Westway Expansion Project

Final Environmental Impact Statement

Responses to Comments

CITY OF HOQUIAM

DEPARTMENT OF ECOLOGY
State of Washington

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Chapter 1
Overview

This *Responses to Comments* report presents comments received during the comment period on the Draft EIS for the Westway Expansion Project and the responses to those comments.

Chapter 1 describes the Draft EIS comment period and noticing, the availability of the Draft EIS, and the public hearings for the Draft EIS. Chapter 1 also describes how comments were received, the type and number of comments received, and the process for reviewing and responding to comments.

1.1 Draft EIS Comment Period

The Draft EIS was released on August 31, 2015. Comments were accepted on the Draft EIS from August 31, 2015, to November 30, 2015. This included an initial 60-day comment period and a subsequent 30-day extension. Notice of availability of the Draft EIS and notification of public hearings, comment period, and comment period extension were advertised as follows.

- Legal notices for the release of the Draft EIS, comment period, and public hearing were published in the *Washington State Register* (201504472 and 201504475) on August 31, 2015.
- Email notices were sent to the individuals, tribes, agencies, and organizations listed in Draft EIS Chapter 8, *Distribution List*, and repeated below under Section 1.2, *Availability of the Draft EIS*.
- A Notice of Availability was published on August 27, 2015, in the Montesano *The Vidette*.
- A news release was issued on August 31, 2015.
- Notice of the public hearings and comment period was published in the following papers: Centralia *The Chronicle* and Aberdeen *The Daily World* on September 26 and October 3; Montesano *The Vidette* on September 24 and October 1.
- Notice of the 30-day extension of the comment period was published in *The Vidette* on October 22, 2015. In addition, notice was provided on October 19, 2015 via the project LISTSERV, SEPA Register, stakeholder emails, and the Washington State Department of Ecology website.

1.2 Availability of the Draft EIS

The Draft EIS was available in electronic format on the Washington State Department of Ecology website at http://www.ecy.wa.gov/geographic/graysharbor/terminals.html.

Printed copies of the Draft EIS available for public review at the following locations.

- Aberdeen Timberland Regional Library
- Hoquiam Timberland Regional Library
- Centralia Timberland Regional Library
- Olympia Timberland Regional Library

- Lacey Timberland Regional Library
- McCleary Timberland Library
- Ocean Shores Public Library
- Washington State Department of Ecology Offices in Lacey
- Hoquiam City Hall, Hoquiam

Notice of the Draft EIS with a link to the document was sent to the following agencies and organizations:

19th District—Representatives
19th District—Senator
24th District—Representatives
24th District—Senator
32nd District—Representative
36th District—Representatives
36th District—Senator
38th District—Senator
46th District—Representatives
Aberdeen, City Council
Aberdeen, Community Development Department
Anacortes, City Council
Association of Washington Businesses
Bellingham, City Council
Capitol Land Trust
Centralia Stream Team
Centralia, City Manager
Chehalis Basin Partnership
Confederated Tribes of the Chehalis Reservation
Chehalis Land Trust
Chehalis River Council
Chehalis, Community Development Department
Citizens for a Clean Harbor
Clark County, Fire and Rescue
Climate Solutions
Coalition of Coastal Fisheries
Coeur d'Alene Tribe
Coastal Dungeness Crab Advisory Board
Columbia River Gorge Commission
Columbia River Inter-Tribal Fish Commission
Columbia Riverkeeper
Cosmopolis
Ecology SEPA Register
Elma, City Council
Forest Ethics
Friends of Grays Harbor
Friends of San Juans
Friends of the Columbia Gorge
Grays Harbor Audubon
Grays Harbor Chamber of Commerce
Grays Harbor Council of Governments
Grays Harbor County Division of Emergency Management *and* Grays Harbor Local Emergency Planning Committee
Grays Harbor County, Planning Division
Grays Harbor Economic Development Council
Grays Harbor Marine Resources Committee
Grays Harbor National Wildlife Refuge
Grays Harbor, Office of County Commissioners
Greater Grays Harbor, Inc.
Hood River, City Council
Hoquiam, City Council
Hoquiam Development Association
Imperium Terminal Services
Jefferson County, Board of Commissioners

Lewis County Emergency Management, Local Emergency Planning Committee

McCleary, City of

Montesano, City Council

Montesano, Community Development Department

National Park Service

Nature Conservancy

NOAA National Marine Fisheries Service

North Pacific Coast Marine Resources Committee

Northwest Indian Fisheries Commission

Oakville, City Hall

Ocean Shores, City Council

Ocean Shores, Planning Department

Olympia, City Council

Olympia, Port Commission

Olympic Coast National Marine Sanctuary

Olympic Region Clean Air Agency (ORCAA)

Port of Grays Harbor

Quinault Indian Nation

RE Sources for Sustainable Communities

Ridgefield, City of

Safe Energy Leadership Alliance

Seattle, City Council

Shoalwater Bay Tribe

Sierra Club

Spokane Lands Council

Spokane Riverkeeper

Spokane Tribe

Spokane, City Council

Surfrider Association

U.S. Army Corps of Engineers

U.S. Fish and Wildlife Service

U.S. Coast Guard Sector Columbia River

Vancouver, City Council

Vancouver, City Manager

Washington Coastal Marine Advisory Council

Washington Department of Archaeology and Historic Preservation (DAHP)

Washington Department of Fish and Wildlife (WDFW)

Washington Department of Natural Resources (DNR)

Washington Emergency Management Division (WEMD)

Washington Energy Facility Site Evaluation Council (EFSEC)

Washington Environmental Council

Washington Public Ports Association

Washington State Council of Firefighters

Washington State Department of Transportation (WSDOT)

Washington Utilities and Transportation Commission (UTC)

Washougal, City of

Westport, City of

Westway Terminal Company LLC

Willapa Grays Harbor Oyster Growers Association

Yakama Nation

1.3 Public Hearings

Two public hearings were held during the comment period.

- October 1, 2015 (1 to 4.30 p.m. and 5:30 to 9 p.m.), at Satsop Business Park in Elma.
- October 8, 2015 (1 to 4.30 p.m. and 5:30 to 9 p.m.), at D&R Theatre in Aberdeen.

The hearings included an open house with informational materials (fact sheets and display boards). Representatives from the Washington State Department of Ecology and consultant staff were

available to answer questions. Open public testimony opportunities were provided from during two sessions: the first from 1:30 to 4:30 p.m. and the second from 5:30 p.m. until the last speaker had commented. A brief presentation provided a description of the proposed action prior to the start of each of the two public testimony sessions. Comment forms were available in the open house at tables where commenters could write in comments and drop into comment boxes. Two court reporters were also available in private areas to record public testimony.

Table 1-1 shows the estimated number of individuals in attendance and the number of comments received at the public hearings.

Table 1-1. Estimated Number of Attendees and Comments Received at Public Hearings

	Elma Hearing (October 1)	Aberdeen Hearing (October 8)	Total
Attendees	120	399	519
Comments received[a]	147	990	1137

[a] Includes oral testimonies, written statements, and form letters/cards.

1.4 Comments on the Draft EIS

Comments on the Draft EIS were accepted during the comment period through the following methods.

- Oral testimony at the public hearings.
- Written statements submitted at public hearings, by mail, or by email to Ecology.
- Statements entered into or uploaded to the online comment form.

1.4.1 Comment Submittals Received by Method

Table 1-2 presents the number of submissions received by the method submitted.

Table 1-2. Submission by Method

Method	Number of Submissions
Online comment form	633
Mail and email	96
Public hearing—in writing	93
Public hearing—oral testimony	271
Form letters	96,475
TOTAL	97,568[a]

[a] Total reflects some duplication not included in the number of submissions presented in Table 1-3, including statements read aloud during oral testimony that were also submitted in writing and form letters that were submitted by multiple methods.

1.4.2 Comment Submittals Received by Commenter Type

Table 1-3 presents the number of submissions received by commenter type.

Table 1-3. Submissions by Commenter Type

Commenter Type	Number of Submissions
Federal agencies	5
State agencies	7
Local agencies	11
Organizations	71
Tribes	9
General public	902
Form letters	96,475
TOTAL	97,480

1.5 Review of and Responses to Comments

All submitted materials were reviewed and considered in the development of this Final EIS. During this review, issues or questions raised by many commenters were identified. These common themes and responses to these themes (master responses) are presented in Chapter 2, *Common Themes and Master Responses.* Unique comments are identified, organized by commenting entity, and responded to in Chapter 3, *Agencies,* Chapter 4, *Tribes,* Chapter 5, *Organizations,* Chapter 6, *General Public*.

Chapter 7, *Form Letters,* presents form letter comments and response to those comments, including individual comments that were submitted on form letters and responses to those comments.

Responses to individual comments rely on the master responses when appropriate.

Additional materials (e.g., studies, reports, news clippings, related communications) presented in support of unique comments are listed in Chapter 8, *Attachments*.

Chapter 2
Comment Themes and Master Responses

This chapter includes responses to key themes raised in comments on the Draft EIS. The responses address overarching issues about the purpose, scope, and approach used in the analysis of impacts, development of mitigation measures, and determination of potentially significant adverse impacts. Specific comments raised by the agencies, tribes, organizations, and the public are individually addressed in Chapters 3 through 7.

The responses refer to the Draft EIS unless information has been revised, in which case the Final EIS is specified.

The following master responses are presented in this chapter.

- Purpose and Focus of the EIS
- Geographic Scope of the EIS
- Connected or Similar Actions
- Project Objectives and Alternatives
- Crude Oil Extraction, Transport, and Combustion
- Baseline and No-Action Alternative
- Vessel Traffic Baseline and Projections
- Mitigation Framework
- Seismic Risk and Design Requirements
- Earthquake Probabilities
- Environmental Health and Safety Analysis
- Risk Assessment Methods
- Oil Spill Modeling Methods
- Emergency Response and Planning Gaps Evaluation
- Liability and Responsibility for Incidents
- Cumulative Impact Analysis
- Economics, Social Policy, and Cost-Benefit Analyses

2.1 Purpose and Focus of the EIS

2.1.1 Comment

Many commenters expressed opposition or support for the proposed action either specifically or generally and stated that the co-lead agencies should either approve or deny the proposed action for the reasons stated in individual comments. Commenters also raised specific issues that they felt should be addressed in the EIS.

2.1.2 Response

Review under the State Environmental Policy Act (SEPA) is required when a governmental action as defined in the Washington Administrative Code (WAC) 197-11-704 is required by a state or local agency. Because implementation of the Westway Terminal Expansion Project (proposed action) would require state and local permits, the proposed action is subject to SEPA review.

There are two agencies designated as co-leads responsible for the SEPA review, the City of Hoquiam and the Washington State Department of Ecology (Ecology). The co-lead agencies issued a determination of significance on April 10, 2014, providing notice of the intent to develop an EIS for the proposed action.

A third-party contractor was hired to prepare the EIS. The cost of the analysis, document preparation, and public outreach activities are paid for by the applicant; however, the City of Hoquiam administers the contract and the City and Ecology oversee and direct the contractor's work and the development of the Draft and Final EIS. The applicant reviewed and commented on the Draft EIS at the same time as the public.

The environmental review process under SEPA is designed to work with other regulations to provide a comprehensive review of a proposal. SEPA review is intended to ensure that environmental values are considered during decision-making by state and local agencies. WAC 197-11-444 lists the elements of the environment that may be analyzed in an EIS. These include the natural environment (earth, air, water, plants and animals, energy, and natural resources) and the built environment (environmental health, land and shoreline use, transportation, public services, and utilities). The rule requires that elements of the environment that are evaluated in the EIS should be narrowed to just those that may be significantly affected by the proposed action and alternatives. Elements of the environment that are not significantly affected need not be discussed (WAC 197-11-440)(6)(a). These elements and related topics of interest are considered to be outside the scope of this EIS.

The SEPA EIS process provides opportunities for public input during scoping and public review and comment on the Draft EIS. Information collected during the SEPA review process, including information provided by the public, organizations, tribes, and other agencies, helps to inform the analysis of environmental impacts and to develop the Draft and Final EISs.

The Final EIS is then used by agency decision-makers, applicants, and the public to understand the potential environmental impacts associated with the proposal, the mitigation measures that could be implemented to reduce those impacts, and, ultimately, whether the proposal would result in significant unavoidable adverse impacts.

The purpose of the EIS is to provide information for decision-makers to consider; the purpose is not to recommend that a proposed action be approved or denied. Although SEPA gives agencies the authority to condition or deny permits based on the agency's adopted SEPA policies and environmental impacts identified in a SEPA document consistent with WAC 197-11-660, decisions related to an underlying action, such as a decision to permit the proposed action, are addressed through procedures specific to the permitting agency. Therefore, while comments that express favor or opposition to the proposed action are acknowledged, expressly addressing these types of comments is outside the scope of the EIS.

Refer to the Master Response for Geographic Scope of the EIS for more information about the scope of the EIS. Refer to the Master Response for Mitigation Framework for more information about the use of SEPA substantive authority to condition or deny a permit. Refer to the Master Response for Connected or Similar Actions for more information about how other actions were evaluated for considered in this EIS,

2.2 Geographic Scope of the EIS

2.2.1 Comment

In general, commenters indicated that the Draft EIS should expand the study area and analyze in detail the impacts associated with transportation from the source of the crude oil to its final point of delivery.

2.2.2 Response

Numerous provisions in the SEPA Rules clarify and emphasize that the purpose of the EIS process is to (a) identify and address the significant impacts of the proposed action and (b) either avoid or minimize discussions of insignificant impacts. The following excerpt of the rules provides relevant examples.

- The purpose of an EIS is to provide an impartial discussion of "significant environmental impacts" (197-11-400(2)).
- Discussion of insignificant impacts is not required; if included, such discussion shall[1] be brief and limited to summarizing impacts or noting why more study is not warranted (197-11-402(3)).
- The description of the existing environment and the nature of the environmental impacts shall be limited to the affected environment (197-11-402).
- For purposes of deciding what an EIS must cover, affecting refers to "having probable, significant adverse environmental impacts" (197-11-712).
- Probable means likely or reasonably likely to occur as in a reasonable probability. Probable is used to distinguish likely impacts from those that merely have a possibility of occurring but are remote or speculative (197-11-782).

[1] The SEPA Rules use of the term "shall" to mean that it is a "mandatory" provision (197-11-700(3) (a)).

Consistent with this guidance, as noted in Draft EIS Chapter 3, Section 3.0, *Introduction*, the study area for the analysis of impacts is tailored specifically to each resource area; however, in general, the study area includes resources with the potential to be affected in three areas:

- At the project site.
- Along the Puget Sound & Pacific Railroad (PS&P) rail line between the project site and Centralia, Washington, where the PS&P rail line connects to the national main line railroad system.
- In and around Grays Harbor out to 3 nautical miles from the mouth of the harbor.[2]

This study area is the focus of the analyses of potential impacts associated with construction and routine operations presented in Chapter 3, *Affected Environment, Impacts, and Mitigation*, and risk-related impacts presented in Chapter 4, *Environmental Health and Safety*. Beyond this area, the Draft EIS qualitatively discusses the potential for any offsite impacts associated with rail and vessel transport to and from the project site from the likely source of the crude oil to its final destination, as presented in Chapter 5, *Extended Rail and Vessel Transport*. The reasons for taking this approach are described below.

Routes

As noted in Draft EIS Section 3.0, *Introduction*, all rail and vessel traffic traveling to and from the project site must travel from Centralia to 3 nautical miles from the mouth of Grays Harbor. In other words, there is complete certainty that rail and vessel traffic associated with the proposed action would travel along these corridors. As described in Final EIS Chapter 5, Section 5.4.2.1, *Mainline Routes, Traffic, and Commodities*, routes are less certain in the extended study area. While current BNSF rail operations in Washington State point to loaded unit trains traveling westbound from Spokane to Vancouver, Washington, on the Columbia River Gorge route, and empty trains traveling eastbound on the Stevens Pass and the Columbia River Gorge routes, BNSF has not specified a route. Rail corridors beyond Washington State would depend on the source of the crude oil, which is assumed the Williston Basin, as described in Final EIS Chapter 5. Chapter 5 considers the northern route from Williston Basin through western North Dakota and Montana, but trains could travel on the more southerly routes through these areas. Vessels travelling to and from the waters outside 3 nautical miles of the mouth of Grays Harbor would likely travel either north or south along the West Coast to U.S. ports. Although vessels could also travel to international ports, this is unlikely for economic reasons; refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Traffic Volume

Within the study area, rail and vessel traffic related to the proposed action—approximately 1.25 rail trips per day and 0.7 vessel trip per day at maximum throughput operations—would represent a substantial increase compared to both existing conditions and the no-action alternative. In the extended study area, rail and vessel trips generated by the proposed action would be minimal compared to existing and projected (where available) traffic volumes.

[2] As discussed in the Master Response for Crude Oil Extraction, Transport, and Combustion, greenhouse gas emissions are an exception and are addressed in a broader study area for the reasons described in that master response.

As shown in Table 2-1, rail trips under the proposed action (approximately 1.25 per day) represents a substantial percentage (40%) of baseline[3] rail traffic in the study area.

Table 2-1. Proposed Action Rail Trips as a Percentage of Existing and Projected Rail Trips—Study Area

Route	Proposed Action Trips per Day	Projected 2017 and 2037 Trips per day without Proposed Action	Proposed Action Trips as a Percentage Increase
PS&P Rail Line	1.25	3.1	40.3%

As shown in Table 2-2, trips related to the proposed action represent between 1.3 and 8.9% of 2015 traffic estimates along the assumed routes; along the assume routes for loaded trains, proposed action trips represent between 1.3 and 3.2% of 2015 estimates. Proposed action trips represent between 0.7 and 4.8% of 2035 projections along the assumed routes; along the assumed routes for loaded trains, proposed action trips represent between 0.7 and 1.9% of 2035 estimates.

Table 2-2. Proposed Action Rail Trips as a Percentage of Existing and Projected Rail Trips—Extended Study Area (Washington State)

Route Segment	Subdivision	Proposed Action Trips Per Day	Estimated 2015 Trips Per Day[a]	Proposed Action Trips as a Percentage	Projected 2035 Trips per Day[b]	Proposed Action Trips as a Percentage
Idaho/ Washington State Line-Spokane	Spokane	1.25	70	1.8%	125	1.0%
Spokane-Pasco	Lakeside	1.25	39	3.2%	66	1.9%
Pasco-Vancouver	Fallbridge	0.625	34	1.8%	56	1.1%
Vancouver-Centralia[c]	Seattle	0.625	50	1.3%	85	0.7%
Centralia-Auburn[d]	Seattle	0.625	50	1.3%	85	0.7%
Auburn-Yakima[d]	Stampede	0.625	7	8.9%	13	4.8%
Yakima-Pasco[d]	Yakima Valley	0.625	7	8.9%	13	4.8%

[a] Extrapolated to 2015.
[b] Numbers do not include crude oil unit trains or rail traffic related to coal export terminal proposals in Washington State.
[c] Assumed loaded trains only
[d] Assumed empty trains only
Source: Washington State Department of Transportation. 2014. *Washington State Freight Mobility Plan*. October. Available: http://www.wsdot.wa.gov/freight/freightmobilityplan.htm.

As shown in Table 2-3, tank vessels trips (0.7 per day) under the proposed action represent a substantial percentage (55 to 70%) of large commercial vessel traffic in the study area as projected

[3] No increase in rail traffic is projected in the study area under the no-action alternative in 2017 and 2037.

for 2017 and 2037. Table 2-4 presents proposed action trips as a percentage of large commercial vessel[4] trips in 2015 to and from selected West Coast destinations in the extended study area where proposed action vessel trips may occur. As shown in the table, proposed action vessel trips would represent the following percentage of 2015 large commercial vessel traffic in major West Coast destinations: 4.5% of Puget Sound traffic, 4.0% of San Francisco Bay area traffic, and 3.2% of Los Angeles area traffic.[5]

Table 2-3. Proposed Action Vessel Trips as a Percentage of Projected Large Commercial Trips—Study Area

Route	Proposed Action Trips Per Day	Projected 2017 Trips	Proposed Action Trips as a Percentage	Projected 2037 Trips	Proposed Action Trips as a Percentage
Grays Harbor Navigation Channel	0.7	0.9	70%	1.2	55%

Table 2-4. Proposed Action Vessel Trips (238 trips per year) as a Percentage of Existing Large Commercial Vessel Trips Calling at Major West Coast Port Areas

Selected West Coast Destinations	Estimated Annual Trips (2015)[a]	Proposed Action Trips as a Percentage
Washington		
Puget Sound	5,196	4.5%
California		
San Francisco Bay Area Ports[b]	5,936	4.0%
Los Angeles–Long Beach Ports[c]	7,376	3.2%

[a] Based on number of calls of vessels over 1,000 gross tons; a call is assumed to equal two trips (one inbound and one outbound).
[b] Includes major ports accessed via the San Francisco Bay.
[c] Ports of Los Angeles and Long Beach are adjacent to each other.
Source: U.S. Maritime Administration 2015 (California ports); Washington State Department of Ecology 2016b (Puget Sound).

For these reasons, Chapter 5 acknowledges the types of potential impacts associated with routine rail and vessel traffic in qualitative terms. As noted in the draft and final version of Chapter 5, the routine impacts are likely to be similar in nature to those described in Chapter 3.

Baseline Risk

For risk, an additional consideration applies to the decision to address impacts qualitatively in the extended study area. While the proposed action would introduce the transport of crude oil by rail and vessel to the study area, crude oil and a broad range of other flammable and toxic materials are already transported by unit train and tank vessel in the extended study area. Likewise, the potential consequences associated with an incident involving a crude oil unit train or tank vessel would be new to the study area, whereas these potential consequences already exist in the extended study

[4] Based on vessels of more than 1,000 gross tons.
[5] The Ports of Los Angeles and Long Beach, which are adjacent to each other.

area. Existing risks in the extended study area also include those associated with the transportation of a wide variety of flammable and toxic materials.

Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative. As clarified in Final EIS Chapter 5, *Extended Rail and Vessel Transport,* and Chapter 6, *Cumulative Impacts,* these impacts would be similar to those described in Section 4.7, *Impacts on Resources*.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns in the extended study area. These efforts would also help to reduce any risks related to the proposed action.

2.3 Connected or Similar Actions

2.3.1 Comment

Commenters indicated that the Draft EIS should evaluate the potential impacts associated with other proposals that would result in increased levels of rail and vessel traffic in Washington State.

2.3.2 Response

In determining the scope of a SEPA EIS, an agency must consider the proposed action and determine if there are any connected actions[6] and similar actions[7] to be evaluated in the EIS (SEPA Rules at 197-11-792). Unlike connected actions, which are expected to be analyzed in the same SEPA document, the inclusion of similar actions is optional; i.e., "Agencies may wish to analyze similar actions in a single document" (197-11-060(3) (c)).

Because the proposed action is neither part of a larger proposal or dependent on the implementation of any other new projects in order to proceed, it has independent utility. The proposed action is solely dependent on the approval of the site-specific permits and requirements identified in the Draft EIS. The proposed action does not require any offsite rail line improvements to receive the crude oil by rail or any offsite port improvements to load crude oil for transport to refineries. The proposed action is not dependent on new sources of crude or increased well drilling. Therefore, no connected actions require evaluation in the Draft EIS.

The cumulative impacts analysis in Draft EIS Chapter 6, *Cumulative Impacts*, includes two proposed projects in the study area, each with the potential to be considered similar actions under SEPA: the Grays Harbor Rail Terminal Expansion Project and the REG (formerly Imperium Terminal Services)

[6] Connected actions are proposals or parts of proposals that are closely related (197-11-060(3) and 197-11-305(1)) and should be evaluated in the same environmental document. Proposals or parts of proposals are closely related if either (1) they cannot or will not proceed unless the other proposals (or parts of proposals) are implemented simultaneously with them; or (2) are interdependent parts of a larger proposal and depend on the larger proposal as their justification or for their implementation.

[7] Similar actions are those actions that, when viewed with other reasonably foreseeable actions, have common aspects that provide a basis for evaluating their environmental consequences together, such as common timing, types of impacts, alternatives, or geography (197-11-060(3)(c)(1).

Expansion Project. Because the three projects are located near each other and would use the same transportation corridors in the study area, their potential cumulative impacts are addressed in Chapter 6. For more information about analyzing impacts in the extended study area, refer to the Master Response for Geographic Scope of the EIS.

2.4 Project Objective and Alternatives

2.4.1 Comment

Commenters indicated that the objective of the proposed action does not serve as the appropriate basis for selecting alternatives and that the EIS should articulate the purpose and need for the proposed action.

2.4.2 Response

Final EIS Chapter 2, *Proposed Action and Alternatives*, has been revised to more clearly highlight the objective of the proposed action, including the purpose and need to which the proposal is responding consistent with WAC 197-11-44-(4). As stated in the Draft EIS *Summary* and described in the Final EIS Chapter 2, *Proposed Action and Alternatives*, the proposed action objective is to expand the existing bulk liquid storage terminal to receive crude oil by train, store the crude oil, and load crude oil onto tank vessels at the Terminal 1 dock for shipping to refineries on the West Coast and potentially abroad.

For a private project on a specific site, under SEPA, the lead agency is required to evaluate only the no-action alternative plus other reasonable alternatives for achieving the proposal's objective on the same site (WAC 197-11-440(5) (d)). Reasonable alternatives are thereby limited to those that (1) can be feasibly attained or approximate a proposal's objective but at a lower environmental cost or decreased level of environmental degradation; (2) can be implemented on the same site as proposed; and (3) when the agency with jurisdiction can control the private project's impacts by means of required mitigation measures (197-11-786). Consequently, alternatives that involve components beyond the applicant's site controls (e.g., delivery pipeline to the project site, an offsite alternative) are not reasonable alternatives to the proposed action. No reasonable alternatives to the proposed action with lower environmental costs were identified. Therefore, the Draft EIS analysis considers the no-action alternative and the proposed action.

2.5 Crude Oil Extraction, Transport, and Combustion

2.5.1 Comment

Commenters indicated that the Draft EIS lacked analysis to support a conclusion that the proposed action would not cause an increase in crude oil extraction and combustion, and that in the absence of such analysis the Draft EIS should assess greenhouse gas emissions from extraction and combustion of the proposed throughput as additive emissions. Commenters also questioned whether lifting the ban on the export of crude oil would result in shipments of crude oil to foreign markets.

2.5.2 Response

As described in Draft EIS Chapter 2, *Proposed Action and Alternatives*, crude oil would arrive at the proposed facility by unit train. The oil is expected to originate as Bakken oil from the Williston Basin in North Dakota,[8] but could be diluted bitumen derived from oil sands in Alberta, Canada. The crude oil would be unloaded and transferred to onsite storage tanks to be loaded to tank vessels for transport to refineries.

A crude oil market analysis (Final EIS Appendix Q, *Crude Oil Market Analysis*) evaluated the potential destinations of the oil. It considered the lifting of the Energy Policy and Conservation Act of 1975 that banned the export of crude oil from the United States (December 2015) and the potential for the proposed action to affect crude oil production in the Williston Basin and Alberta oil sands. The results of this analysis are summarized in Final EIS Chapter 5, Section 5.3, *What are the likely sources and destinations of crude oil?*

For Bakken crude oil, the capacity to move crude oil out of the Williston Basin via rail, pipelines, and trucks, referred to as *takeaway capacity*, is well above current production levels. Moreover, additional takeaway capacity has been planned for the coming years. Because takeaway capacity is not constrained out of Williston Basin, additional takeaway capacity provided by the proposed action would not induce production of Bakken crude oil. For Canadian crude, oil production growth may be more constrained by takeaway capacity than Bakken growth. Therefore, the proposed action would have a slightly greater likelihood of increasing Canadian oil production. However, transloading of diluted bitumen at the proposed facility would depend on several factors. If the proposed facility is transshipping Bakken crude oil, capacity may be insufficient to handle Canadian crude oil. Moreover, to handle the heavy, viscous diluted bitumen, additional investment in storage tanks and other equipment would be required. Lastly, rail transport to the West Coast would need to be more economically favorable than rail transport to the Gulf Coast.

Despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States (December 2015), the likely destination for crude oil from the project site remains West Coast refineries in Puget Sound and California. As described in Appendix Q and Section 5.3, the oil pricing, freight costs, vessel size, and transportation costs of exporting to likely foreign markets make shipment to West Coast ports more favorable.

Because the proposed action would not be likely to affect oil production, greenhouse gas emissions related to extraction activities of crude oil are not quantified in the EIS.

Final EIS Chapter 3, Section 3.2.5.2, *Proposed Action*, and Chapter 6, Section 6.5.1.2, *Air*, *Cumulative Impacts*, reflect the additional greenhouse gas emission estimates related to rail and vessel transport beyond the state—from the likely source (Williston Basin) to the furthest likely destination (Port of Long Beach, California). As noted in the Final EIS, it is anticipated that much of this crude oil transloaded via the proposed action and cumulative projects would replace crude oil that was previously transported to these refineries by other means. To the extent that the crude oil would replace oil shipped from other sources, transport emissions would not be entirely additive. The Final EIS presents net greenhouse gas emission estimates from offsite transportation, based on rail and vessel transport emissions from source to final destination, as described above, offset by vessel transport emissions between Valdez, Alaska, and Long Beach, California.

[8] The Williston Basin rail terminals are primarily in North Dakota but extend into Montana, South Dakota, and Saskatchewan, Canada.

2.6 Baseline and No-Action Alternative

2.6.1 Comment

Commenters indicated that the Draft EIS should compare the impacts of the proposed action to the existing condition and not to the no-action alternative. Commenters stated that it is inappropriate to assume the no-action alternative would include development of another project at the project site because it is not reasonable to conclude that potential impacts could be the same even if the proposed action is not approved. Commenters also indicated that the EIS should consider the potential for impacts over the lifetime of the proposed action.

2.6.2 Response

The baseline for the analysis in the Draft EIS considers both existing conditions (i.e., affected environment) and the no-action alternative, except for impacts that were evaluated quantitatively. This is particularly relevant for transportation- and risk- related impacts, which can evolve over time because of reasonably foreseeable increased growth, planned infrastructure changes, and phased regulatory requirements for improved transportation efficiency and safety. For these resource areas, the no-action alternative provides a more realistic baseline and serves to indicate how environmental conditions are likely to change in the absence of the proposed action.

Final EIS Chapter 3, Section 3.0, *Introduction*, clarifies that the analysis considers the potential for impacts over the lifetime of the proposed facilities. For impacts that are evaluated quantitatively, the analysis considers the potential for impacts in 2017— the anticipated first year of operation—and 2037 to account for future growth and development. The impacts identified for 2037 would exist throughout the lifetime of the proposed action. This approach provides context to decision-makers about how the impacts of operations would evolve over a reasonably foreseeable period.

Draft EIS Chapter 3, Sections 3.15, *Rail Traffic*, 3.16, *Vehicle Traffic and Safety*, and 3.17, *Vessel Traffic*, provide detailed explanations of how the no-action baseline was developed to account for increased growth, increased efficiency, and improved management and infrastructure planning for transportation-related impacts over time. These assumptions serve as the basis for the analysis of risks presented in Chapter 4, *Environmental Health and Safety*. In many cases, the potential for increased impacts are also comparable to the existing condition, which is presented in the *Affected Environment* sections of Sections 3.15, 3.16, and 3.17, and in Sections 4.4.1, 4.5.1, and 4.6.1, *What are existing risks*?. For more information about how the baseline for the evaluation of impacts on vessel traffic was developed, see Master Response for Vessel Traffic Baseline and Projections.

The analysis of the no-action alternative does not assume that a future development similar to the proposed action would occur at the project site but rather that over the 20-year period, another project *could* be developed. Depending on the nature of the proposed activities, some of the impacts could be similar. However, the statement in each resource section of Draft EIS Chapter 3 that introduces the impacts related to the no-action alternative—which refers to the possibility that another project could be developed at the project site over the 20-year period—has led to misinterpretation of the baseline used in the Draft EIS analysis and has, therefore, been removed in the Final EIS.

2.7 Vessel Traffic Baseline and Projections

2.7.1 Comment

Commenters questioned the basis for determining the baseline (no-action) vessel traffic volumes used in the Draft EIS for the analysis of impacts related to vessel traffic. In some cases, commenters indicated that the baseline for comparison was overstated and resulted in underestimating the potential impacts; in other cases, commenters indicated that the baseline was understated and resulted in overestimating impacts.

2.7.2 Response

The large commercial vessel traffic volumes projected for the no-action alternative use as a basis historical data for the most recent 5-year period available at the time of the analysis (2008–2012). Although vessel traffic levels were higher prior to this 5-year period, the type and size of the vessels, drafts, commodities, and origins and destinations were highly variably and not as comparable to existing and projected traffic in the harbor. For example, from 1999 through 2006, no tanker and tank barge traffic occurred in Grays Harbor.[9] The 5-year period used in the Draft EIS accounts for year-to-year variability and represents current vessel traffic at the port. Future vessel traffic was determined by applying moderate compound annual growth rates to vessel trips associated with the present commodity volumes shipped from the port as described in Draft EIS Chapter 3, Section 3.17.3.2, *Impact Analysis*.

2.8 Mitigation Framework

2.8.1 Comment

Commenters raised many issues related to mitigation, including general concerns about how it was developed and how the measures would be enforced. Commenters raised concerns that, in many cases, there is not a clear mechanism for implementing or enforcing the proposed mitigation and that implementation may not eliminate the impact. Commenters further stated the applicant should be made responsible for addressing the indirect impacts of the proposed action, particularly those associated with rail operations (e.g., increased safety risks and vehicle congestion and delay).

2.8.2 Response

As noted in Draft EIS, Chapter 3, Section 3.0.5, *How was mitigation identified*? mitigation measures are considered when applicable regulations, permit conditions, and required plans did not adequately reduce potentially significant impacts. The specific regulations, permits, or plans are identified in each resource section of Final Chapter 3, *Affected Environment, Impacts, and Mitigation*,

[9] Washington State Department of Ecology. 1999 to 2006. *Vessel Entries and Transits for Washington Waters 1999–2006.* Spill Prevention, Preparedness and Response Program. Available: https://fortress.wa.gov/ecy/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Spills&DocumentTypeName=Publication.

and in Chapter 4, Section 4.2, *Applicable Regulations*. Additional information is provided in Final EIS Appendix B, *Applicable Regulations.*

As described in the Draft EIS and Final EIS, mitigation measures include voluntary measures and design features, applicant mitigation, and other measures to be considered.

- **Voluntary measures and design features.** Voluntary measures and design features would be voluntarily implemented by the applicant and are not otherwise required by law. These voluntary measures and design features are considered elements of the proposed action.
- **Applicant measures.** Applicant measures are proposed to reduce potentially significant impacts remaining after regulatory compliance and voluntary commitments are considered. These measures are not required by inclusion in the EIS but could be incorporated into permit decisions informed by this EIS. SEPA requires that mitigation measures be reasonable and capable of being accomplished (Revised Code of Washington [RCW] 43.21C.060). Mitigation measures would be enforceable through a permit specific to the applicant's proposal.

  Under SEPA, agencies responsible for taking government action on a proposal, such as the proposed action, have the authority to require mitigation to address potentially significant impacts if the following criteria are met (WAC 197-11-660).

  1. Any governmental action on public or private proposals that are not exempt may be conditioned or denied under SEPA to mitigate the environmental impact subject to the following limitations:
     a. Mitigation measures or denials shall be based on policies, plans, rules, or regulations formally designated by the agency (or appropriate legislative body, in the case of local government) as a basis for the exercise of substantive authority and in effect when the DNS or DEIS is issued.
     b. Mitigation measures shall be related to specific, adverse environmental impacts clearly identified in an environmental document on the proposal and shall be stated in writing by the decision maker. The decision maker shall cite the agency SEPA policy that is the basis of any condition or denial under this chapter (for proposals of applicants). After its decision, each agency shall make available to the public a document that states the decision. The document shall state the mitigation measures, if any, that will be implemented as part of the decision, including any monitoring of environmental impacts. Such a document may be the license itself, or may be combined with other agency documents, or may reference relevant portions of environmental documents.
     c. Mitigation measures shall be reasonable and capable of being accomplished.
     d. Responsibility for implementing mitigation measures may be imposed upon an applicant only to the extent attributable to the identified adverse impacts of its proposal. Voluntary additional mitigation may occur.
     e. Before requiring mitigation measures, agencies shall consider whether local, state, or federal requirements and enforcement would mitigate an identified significant impact.

  An applicant must be reasonably able to implement required mitigation. An applicant cannot be required to act beyond its legal authority or jurisdiction. For example, the applicant has no ability to make railroad improvements or set operational standards for trains which are the responsibility of PS&P under federal regulations.

  Other measures to be considered. Other actions implemented by parties other than the applicant could further reduce potentially significant impacts associated with the proposed action. These measures are outside the control or authority of the applicant. In some cases, other

measures may be part of ongoing efforts to address existing problems (unrelated to the proposed action) or related to existing requirements or regulations that protect public resources and safety. The recommended actions would not be enforceable through a permit specific to the applicant's proposal. The Draft EIS identifies these measures to disclose additional actions or processes that could address potentially significant impacts associated with the proposed action. These types of actions can help decision-makers and planners to establish priorities for actions within their authority and jurisdiction to implement.

The mitigation presented in the Final EIS has been developed within the limits of this regulatory framework. In general and to the extent practicable, measures have been revised to provide greater specificity (e.g., timing of initiation and completion) with the intent of improving the effectiveness of the measures. As appropriate, measures have been revised to clarify parties who should participate in their execution and, to the extent possible, those who would be responsible for each measure.

Any agency issuing a permit decision related to the proposed action must provide in writing the reasons for either conditioning or denying the permit consistent with its own policies (WAC 187-11-660, RCW 42.21C.060). If the proposal is approved and a permit is issued, the deciding agency can condition the permit and identify specific measures deemed necessary to minimize potentially significant impacts within the limitations of SEPA substantive authority. These measures would become legal requirements that must be met by the applicant and would be enforceable by the conditions of a permit. If the deciding agency so chooses, monitoring and reporting requirements can also be imposed on the applicant to provide proof of compliance with the requirements. Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis,* includes a proposed mitigation measure specifying monitoring and reporting requirements. These reports would be part of the public record. The City of Hoquiam will be the first agency to take action on the proposal through consideration of the application for a shoreline substantial development permit.

2.9 Seismic Risk and Design Requirements

2.9.1 Comment

Commenters indicated that the current Washington State Department of Natural Resources Tsunami Inundation Map for the study area does not incorporate the latest information regarding tsunami risks and should not be relied on for assessing hazards related to tsunamis. Commenters also indicated that the Draft EIS does not adequately address risks related to earthquakes, tsunamis, and liquefaction.

2.9.2 Response

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. To inform the risk of tsunamis at the project site, a site-specific tsunami model was completed and an assessment of tsunami risks specific to the project site was completed as presented in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis.* As noted, although the potential for earthquakes

and earthquake-related impacts would remain the same compared to the no-action alternative, there is an increase in the potential for environmental damages from spilled oil.

As described in Section 3.1.5.2, prior to construction, the applicant would be required to undergo City of Hoquiam and City of Aberdeen Critical Areas Reviews for geologically hazardous areas and to obtain building permits from the two cities. During the application process, detailed reports would be prepared, including a critical areas review and a geotechnical report. Sufficient detail would be developed to establish project design elements that would withstand applicable earthquake magnitudes and associated liquefaction consistent with current building codes and design standards.

Current building codes and applicable design standards do not address site-specific tsunami risks. For this reason, the tsunami impact modeling and analysis (Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis*) was conducted to evaluate tsunami risks at the project site. The models evaluated tsunami risks using the latest tsunami analysis method that includes a more recent full-margin rupture model for Cascadia Subduction Zone (CSZ) earthquakes than the state's tsunami hazard maps.[10] The tsunami analysis used an earthquake source model and hydrodynamic modeling method described in the Oregon Department of Geology and Mineral Industries' Special Paper 43 (Witter et al. 2011).[11] The analysis assumed a large rupture of the CSZ, which is about 30% larger than the most likely CSZ rupture scenario. This correlates to an estimated inundation depth of 21 to 33 feet at various locations at the project site. Moreover, the analysis included specific wave and debris forces calculated based on guidance from the Federal Emergency Management Agency's *Guidelines for Design of Structures for Vertical Evacuation from Tsunamis.*[12] The guidance for refuge facilities is intended to be protective of human life during a tsunami and as such provides as much certainty as possible that the proposed facilities would withstand potential tsunami and debris forces without allowing spillage of crude oil to the environment.

Draft EIS Chapter 3, Section 3.1.7.1, *Applicant Mitigation*, proposes applicant mitigation measures to further reduce potential impacts of earthquakes and to address site-specific tsunami risks based on the tsunami impact modeling and analysis.

Draft EIS Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* acknowledges that a large-scale tsunami would likely cause unavoidable and significant adverse environmental effects at or near the site if the facility was not constructed to withstand it. Final EIS Section 3.1.8 clarifies that implementation of the design and construction measures described in Section 3.1.71 would minimize these risks by designing the storage tanks to withstand expected forces and provide full containment of contents during and after seismic and tsunami events. The potential for the release of oil to the environment from the oil transfer and collection system, unloading rail cars on site, and onloading vessels at dock would remain.

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[10] Since the publication of the state's hazard mapping in 2000, recent tsunami events and advancements in the understanding and methods applied to tsunami modeling have provided for refinement of these estimates.

[11] Witter, R. C., Y. Zhang, K. Wang, G. R. Priest, C. Goldfinger, L. L. Stimely, J. T. English, and P. A. Ferro. 2011. Special Paper 43. Simulating Tsunami Inundation at Bandon, Coos County, Oregon, Using Hypothetical Cascadia and Alaska Earthquake Scenarios.

[12] Federal Emergency Management Agency. 2012. *Guidelines for Design of Structures for Vertical Evacuation from Tsunamis.* National Earthquake Hazard Reduction Program. 2nd Edition. FEMA P-646. April.

Earthquake risk assessment and design are iterative and ongoing processes during which varying levels of investigation and analysis are performed to identify and address the potential impacts associated with a project commensurate with its stage in development. Implementation of measures identified during investigations specific to the proposed action and any others identified during subsequent investigations would be required to adequately reduce the risks of the proposed action.

2.10 Earthquake Probabilities

2.10.1 Comment

Commenters indicated that the probabilities of strong earthquakes reported in the Draft EIS do not match other available information regarding probabilities of strong earthquakes.

2.10.2 Response

Draft EIS Table 3.1-2 reports the probabilities of strong earthquakes occurring at the project site within a 50-year period and within 31 miles (50 kilometers). It is based on 2009 U.S. Geological Survey information. More current information has been incorporated into 2014 U.S. Geological Survey maps (Petersen et al. 2014),[13] including information on turbidite event history (Goldfinger et al. 2012).[14] Estimates of large earthquake (9.0 M_W or greater) probabilities in Petersen et al. (2014) still fall within the range reported in Table 3.1-2 and are valid based on the most up-to-date information.

Lower-intensity earthquakes may cause damage to storage tanks at the project site. However, in accordance with the International Building Code and Petroleum Institute 650, the Maximum Credible Earthquake (MCE) will be used for design based on code requirements. For the Draft EIS, the MCE is defined as the CSZ L1 Mw 9.0. This would reduce impacts from all magnitudes of earthquakes 9.0 Mw or smaller. The Draft EIS considers the impacts related to a large and intense earthquake, and smaller events are considered by inclusion

2.11 Environmental Health and Safety Analysis

2.11.1 Comment

Commenters indicated that different approaches should have been used to analyze risks and that the risk of incidents, including spills, fires, or explosions should have been identified for specific resources along rail and vessel transportation routes. Commenters also stated that a broader range of scenarios that included the worst-case outcome from onsite (terminal) operations and rail and vessel transport should have been addressed.

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[13] Petersen, M. D. and 16 others. 2014. Documentation for the update of the United States national seismic hazard maps. U.S. Geological Survey Open-File Report 2014-1091.

[14] Goldfinger, C., Nelson, C.H., Morey, A.E., Johnson, J.E., Patton, J.R., Karabanov, E., Gutiérrez-Pastor, J., Eriksson, A.T., Gràcia, E., Dunhill, G., Enkin, R.J., Dallimore, A., and Vallier, T., 2012, Turbidite event history—Methods and implications for Holocene paleoseismicity of the Cascadia subduction zone: U.S. Geological Survey Professional Paper 1661–F, 170 p. (Available at http://pubs.usgs.gov/pp/pp1661f/).

2.11.2 Response

Draft EIS Chapter 4, *Environmental Health and Safety*, notes that spills of oil related to the proposed action could occur on land or in water, at any time of day or night, and in any weather condition. It is impossible to know exactly when and where a spill would occur and how much oil would be spilled. Therefore, the risk analysis in the Draft EIS focuses on determining the likelihood and possible spill volumes associated with a representative set of potential spill scenarios related to the proposed action. This approach is consistent with federal and state oil spill planning by identifying potential risks and requiring planning for worst-case spills. By providing this risk information, planners and emergency responders gain a broader understanding of the variety of outcomes and the types of risks that could occur, can identify mitigation measures and response planning and preparedness resources.

As part of the required facility prevention and oil spill contingency plan, which is subject to approval by Ecology, additional detail related to operations and engineering designs would be required from the applicant. Design and planning requirements for facilities, vessel operators, and railroads are described in Chapter 4.

The details about the analysis and results of the risk assessment are presented in Appendix M, *Risk Assessment Technical Report*. The consequences associated with a subset of the spill scenarios were modeled and the detailed results are presented in Appendix N, *Oil Spill Modeling*. Both the risk assessment and oil spill modeling were completed by a third-party contractor in coordination with the co-lead agencies to support evaluation of the proposed action under SEPA.

Selection of the spill scenarios analyzed in Appendix M and presented in Chapter 4 was informed by regulatory reporting requirements and activities specific to the proposed action to identify a range of possible outcomes. The scenarios considered various sizes of potential spills based on the activity (such as transport or transferring oil) and size of tank, rail cars, and vessels. Spill scenarios are characterized by the amount of material spilled. The potential impacts are dependent on the amount spilled, location, and other conditions present at the time of the incident.

The selected scenarios cover the spectrum of release sizes, from smaller (and typically more frequent) spills associated with onsite unloading of rail cars and loading of vessels that may result from mechanical failures or human errors, to the potential for more significant spills from storage tanks, rail cars, or vessels while in transit. The onsite (terminal) spill scenarios represent the types of incidents that could occur specific to the proposed action based on available site-specific data, secondary containment requirements, and the physical separation of the site from the public and the natural environment. Worst-case transportation releases (very large rail and vessel spills) are also considered. Both loaded and unloaded rail and vessel movements are evaluated, although only the loaded movements can result in oil spills (beyond small residual heels in the transport containers). The Draft EIS focuses on the loaded movements when reporting the frequencies of a release.

Scenarios were chosen using expert opinion on locations where spills typically could occur, such as during fuel transfers, or where worst-case spills could occur, such as a vessel incident at the entrance to Grays Harbor. The quantity of oil spilled for these scenarios was based on the definition of worst-case spill for an onshore facility, a vessel, and for rail transport (WAC 173-182-030 and 480-62-300). For an onshore facility, the worst-case spill would involve the entire volume of the largest aboveground storage tank (approximately 8.4 million gallons or 200,000 barrels of crude oil for the proposed action). The spill scenario during vessel loading was estimated taking into account the proposed transfer rate to the vessel multiplied by approximately 1 minute and 25 seconds to

account for the maximum shutdown response time. For rail transport, the worst-case spill on the PS&P rail line would involve approximately 17.75 rail cars. For a vessel, the worst-case spill would involve the vessel's entire cargo and fuel. The largest tankers would be Panamax class with the capacity to hold up to 15.1 million gallons (360,000 barrels). An additional 420,000 gallons (10,000 barrels) was added to represent the fuel onboard the vessel.

While the general approach in the Draft EIS is similar to more detailed risk assessments noted in many of the comments, the approach does not predict when or where an incident would occur, nor does it predict the resulting consequences. As such it is not a quantitative or probabilistic risk assessment. By extension, the Draft EIS does not evaluate in detail the site conditions or predict the specific consequences that would affect individual resource areas or populations along rail and vessels transportation corridors. Therefore, Section 4.7, *Impacts on Resources*, describes the general types of impacts that could occur because of an incident. Final EIS Section 4.7 has been revised to emphasize that many sensitive resources could be adversely affected in the event of an oil spill, fire, or explosion, including potential adverse impacts on human health, social welfare, and the livelihoods of those affected.

Refer to the Master Response for Risk Assessment Methods for more information on the specific methods used in the analysis of risks (Appendix M, *Risk Assessment Technical Report*) and oil spill modeling (Appendix N, *Oil Spill Modeling*).

2.12 Risk Assessment Methods

2.12.1 Comment

Commenters indicated that the methods used in the risk assessment were flawed and resulted in understating the risks associated with the proposed action. More specifically, commenters stated the underlying methods, data sources, and assumptions should account for the existing rail infrastructure, environmental conditions (i.e., weather, soil conditions, and water flow), and other sources of data and that the risk figures were confusing. Additionally, commenters indicated that risks associated with terminal (onsite) activities and rail and vessel transport should be added together to provide a more complete picture of risks and that the EIS should provide information to compare the risk assessment with other studies evaluating the risks of rail transport around the country.

2.12.2 Response

The detailed methods and assumptions used in the risk assessment are described in Draft EIS Appendix M, *Risk Assessment Technical Report*. As noted in Appendix M, the approach to the risk assessment was to determine an appropriate rate for an incident (i.e., likelihood an incident would occur) and to determine the chance of a release (i.e., likelihood that a release would occur because of the incident) relevant to the selected spill scenarios. These values were then applied to the proposed action to calculate the overall chance per year that each spill scenario would occur.

More specifically, the results of the risk assessment are presented in Draft EIS Chapter 4, *Environmental Health and Safety,* in terms of the expected number of years between incidents to provide an idea of how often spills of different sizes might happen. For example, a spill of up to 2,100 gallons could occur during vessel loading at the facility once every 8 years. The results were

also presented on a per-year basis in Appendix M. For example, the same spill of up to 2,100 gallons could occur at the facility 0.12 time per year. The annual results from Appendix M can be multiplied by any number of years to determine the overall chance of an incident occurring over a longer period, such as the lifetime of the proposed action. For example, over a 50-year period, the same spill of up to 2,100 gallons could occur six times.

This was not a quantitative risk assessment nor a probabilistic risk assessment. The various factors considered in determining the appropriate accident and release rates were not weighted except where they are explicitly captured in available data—such as the track class for rail operations or the type of waterway for vessel operations. This approach was used because there are not sufficient sources of historic incident or failure data within the study area, and is a common approach in risk assessments where broader data sets are applied to specific sites and operating conditions.

As noted in Draft EIS Appendix M, this approach was individually tailored to the primary elements of the proposed action: the applicant's onsite (terminal) operations and transportation undertaken by rail and vessel operators moving the crude oil to and from the project site. The data sources used to develop the incident and failure rates for each element were selected as being most representative of conditions applicable to terminal (onsite) activities, rail transport, and vessel transport relevant to the study area and proposed action.

Predicted failure rates for the identified onsite scenarios were based on a number of past studies that analyzed historical data along with guidance published by the United Kingdom's Health and Safety Executive for use in risk assessments. This latter source is based on a definitive compilation and analysis of numerous databases and past studies from various countries and is not limited to United Kingdom data. (See Appendix M, Section 3.2, *Approach and Data* for details.) The selected sources consider all causes of failure, including construction defects, natural hazards, human error, and material failures. Considering the intent of the risk assessment to inform decision makers and planners, as opposed to final technical designs, these sources were considered appropriate for the Draft EIS.

Both rail derailments or collisions and vessel transit incidents (groundings, collisions, and allisions) were analyzed using a combination of recent data, proposed operations, and local conditions (e.g., speed limits and rail car design). Because Washington State gathers information on accidents but not the associated train miles needed to calculate accident rates, nationwide data available from the Federal Railroad Administration was applied to the calculation of rail accidents. (See Appendix M, Section 4.2 *Approach and Data* for details.) As noted in Appendix M, the Federal Railroad Administration data covered 2011 through 2014 and included more recent derailments and circumstances relevant to crude oil by rail transport. Accordingly, the model used to assess accident rates allows for current accident data to be applied and for different configurations of tank cars (such as thicker walls, jackets, fitting protection, and other factors that will be on the new designs required under the May 2015 final rule) to be taken into account. This model was used to evaluate different numbers of cars derailing and spilling and it did not rely on outdated sources of data. The data used for vessel accidents was based on a review of data from the U.S. Coast Guard, various ports, shipping companies, and from data gathered for other studies, along with analyses of those data. The selected data were from Glosten Associates[15](Appendix M, Section 5.2, *Approach and*

[15] Glosten Associates. 2014. *Vessel Traffic and Risk Assessment Study for Puget Sound.*

Data). Natural hazard-induced accidents are built into the various transportation accident rates because all accidents above the current reporting thresholds are included, regardless of cause.

As noted by many commenters, the graphical presentation of risks in the Draft EIS was confusing and open for interpretation. The figures have been removed and Final EIS Chapter 4, *Environmental Health and Safety*, has been revised to describe each spill scenario terms of the range of spill sizes, the specific activities involved, and potential causal events. The risks across these operations are not combined in the Draft EIS because of differing regulatory and design requirements described in Chapter 4, because the cause of an incident involving the facility or rail or vessel transport would likely be different, and because the proposed facility, rail line, and vessel transport corridor are physically separated.

It should also be noted that the results presented in the Draft EIS are not directly comparable with studies that evaluate risks outside this area (e.g., the BNSF main line). This is mainly because detailed risk analysis presented in the Draft EIS is specific to the PS&P rail line. There are substantial differences between the study area (PS&P rail line) and the extended study area (e.g., BNSF main line) with respect to rail transport conditions. The scale of the nationwide rail system is more than a 1,000 times the length of the 59-mile-long segment of the PS&P rail line in the study area and different classes of rail travel at different speeds and under different regulatory requirements. Many more trains travel each day on the main lines. For these reasons, the likelihood of an incident occurring in the study area is lower than the likelihood of an incident occurring on the entire mainline rail system.

Refer to the Master Response for Oil Spill Modeling Methods for more information about the purpose for, assumptions and methods used in, and the limitations of the oil spills modeling.

2.13 Oil Spill Modeling Methods

2.13.1 Comment

Commenters indicated that the General National Oceanic and Atmospheric Administration (NOAA) Oil Modeling Environment (GNOME) modeling platform and Hydraulic Engineering Center–River Analysis System (HEC-RAS) models used to characterize oil spills in Draft EIS Appendix N, *Oil Spill Modeling*, have significant limitations that should be better explained. Commenters recommended other scenarios, inputs, and methods for modeling oil spills.

2.13.2 Response

The general approach to the analysis of impacts presented in Draft EIS Chapter 4, *Environmental Health and Safety*, focuses on assessing the potential risks associated with a set of release scenarios rather than attempting to predict the precise location of a potential spill. This approach was selected to provide decision-makers and planners with a range of possible spill scenarios that could occur related to terminal (onsite) operations and rail and vessel transportation. As discussed in Appendix N, *Oil Spill Modeling*, a subset of the release scenarios was selected for oil spill modeling consistent with applicable contingency planning requirements as follows.

- Two release scenarios associated with **terminal operations** were modeled using GNOME, including an incident during vessel loading and an incident resulting in the release of the contents of an entire storage tank.
- One release scenario associated with **vessel transport** was modeled using GNOME involving an incident resulting in the loss of an entire vessel.
- Three release scenarios associated with **rail transport** were modeled using HEC-RAS involving incidents resulting in the release of one, three, and five rail cars.

In addition to the spill sizes being informed by existing regulations,[16] the analysis adhered to planning requirements to show spill trajectories in 24- and 48-hour increments (WAC 173-182-405). Consistent with these standards, the oil spill modeling effort assumes that no efforts to respond or mitigate a release are made.

GNOME was selected to complete the oil spill trajectory analyses because it is a commonly accepted industry standard for contingency planning, scenario analysis, and oil spill response used by NOAA, the U.S. Coast Guard, and Washington State Department of Ecology (Ecology). GNOME is designed to give responders and contingency planners a perspective on where an oil spill may travel and forecasts how rapidly the oil weathers (the oil's fate in the environment).

Appendix N also presents information comparing oil properties after 48 hours in the environment for three different types of oils using Automated Data Inquiry for Oil Spills (ADIOS). The ADIOS program was used to further refine the analysis of oil fate by providing more detailed estimates about the change in the spilled oil's properties (such as viscosity and density) and behavior (such as the rate of evaporation and dispersion) over time. ADIOS is also a NOAA program that can be used to supplement a GNOME analysis. The analysis in Appendix N combines specific data from GNOME and ADIOS to provide a more complete picture of the spilled oil's fate.

Oil spill modeling requires consideration of wind, tide, and other site-specific environmental factors that influence the trajectory of oil after a spill. GNOME uses Location Files that contain this type of information about the area being modeled. Each Location File contains generalized information about the tides, currents, and shorelines in the region it covers. For most parameters (e.g., currents), averages of historical data are used in the Location Files. Although actual conditions may vary from historical averages at any particular time, the use of the Grays Harbor Location File was considered the most reasonable approach to representing conditions in the study area.

Although GNOME is a widely accepted model, important limitations have been noted in Appendix N and are summarized below. It is important to acknowledge these considerations to understand the limitations of the oil spill modeling output and to remember that the purpose of the modeling exercise is not to predict the precise location or extent of a spill but rather to provide information to decision-makers and planners about the range of possible outcomes.

- GNOME currently does not consider specifically Bakken crude oil or diluted bitumen. Therefore, medium crude oil was used as a proxy based on discussions with NOAA experts.

[16] Refer to the Master Response for Environmental Health and Safety for more information.

- GNOME does not predict how long different types of oils would persist in the environment. For this reason, the ADIOS analysis was completed to provide a more complete picture of the fate of spilled oil over time.
- GNOME considers estimate of river flow conditions for the Chehalis River based on estimated flow data for rivers of a similar size in the absence of reliable discharge data for the Chehalis River.
- The Location File for Grays Harbor only extends approximately 10 miles north or south of the Grays Harbor entrance and does not include Rennie Island. Most of the environmental conditions associated with Rennie Island are included in the model. In order to predict how oil would travel along the coastline, Attachment A of Appendix N, *Oil Spill Modeling Methods*, discusses two previous large spills that occurred off the Washington State coastline to illustrate the directions that oil can migrate offshore depending on seasonal conditions. These discussions are presented as examples and not predictions of the impacts of potential future oil spills. To provide an idea of the fate of oil spilled along the Chehalis River, the HEC-RAS model was used.

As noted above, the Location File for Grays Harbor contains representative information about environmental conditions in the study area and includes options for high, medium, and low river flow rates. Wind conditions are the only parameter entered manually. Wind speeds and directions were selected after discussion with NOAA and Ecology representatives and were based on a review of 18 years of historical wind data (collected at Hoquiam/Bowerman Airport) to identify average or typical wind speeds and directions during the summer (July) and winter (January). Although a catastrophic accident resulting in a spill could be more likely to occur during periods of extreme weather conditions, including winds with higher than average wind speeds, the wind speeds chosen for the GNOME trajectories were average seasonal wind speeds.

As noted in Appendix N, strong winds can control the GNOME oil spill trajectory and "push" the oil into one area without consideration of other conditions such as tides and currents. By selecting moderate winds representative of average conditions, it was possible to achieve a balanced perspective of the different factors influencing oil movement in Grays Harbor.

To provide information about the potential for movement of spilled oil along the Chehalis River, HEC-RAS was used. It is a one-dimensional hydraulic model that is the benchmark for predicting and reviewing river hydraulics. The model is specific to modeling water and not intended to predict or estimate fate and transport of oil. It has been applied in the technical analysis to predict the expected river volume and flow velocity (e.g., speed of the current) for a range of flows: low, moderate, and high. The low-flow rate was developed by reviewing the 61-year flow gauge record at U.S. Geological Survey Gage 12031000 Chehalis River at Porter, Washington. The 2-year and 100-year flow events are based on the hydrology that has been developed for the Chehalis Basin flood control project.

HEC-RAS is used for two purposes. First, the volume of water present during each flow event was compared to the volume of oil spilled in each scenario. The sum of these two volumes was compared to the available capacity in the river channel to determine if the spill could exceed the river channel capacity. Second, the river velocity at each flow event was calculated to determine the minimum travel time from the spill location to Grays Harbor. As noted in the Appendix N, the model does not have the capacity to determine the fate of the oil while in the river and therefore, creates a reasonable approximation of the volume of oil transported to Grays Harbor.

To address in part the limitations discussed above, Chapter 4, Section 4.4.3, *What mitigation measures would reduce impacts related to terminal operations at the project site?* includes a proposed mitigation measure for the applicant to collect data on tides, currents, wave heights, wind, air and water temperature and barometric pressure at the facility, at Oakville, Washington, on the Chehalis River, and at the entrance to Grays Harbor. In addition, the applicant would purchase and stage a current measuring device that includes direction and velocity at the facility dock. The data would be used to improve the GNOME Location File for Grays Harbor. The data would assist in developing trajectories for the GNOME and TAP oil spill models. The data provided would be sufficient so that the models could have the following capabilities.

- Predict how wind, currents, and other processes might move and spread oil spilled on the water.
- Depict a relative distribution of spilled oil movement in Grays Harbor from the harbor entrance to a point to upstream in the Chehalis River near Oakville, Washington.
- Predict a spill trajectory based on a worst-case spill scenario from spills at the terminal, from vessels transiting to and from the terminal, and from derailments along the PS&P rail line.

2.14 Emergency Response and Planning Gaps Evaluation

2.14.1 Comment

Commenters indicated that the Draft EIS should include a more comprehensive evaluation of emergency response capabilities to respond to potential incidents involving the release of crude oil. Commenters requested that the Final EIS be revised to reflect details about comprehensive updates to emergency response plans (e.g., individual rail plans, Northwest Area Contingency Plan, and individual geographic response plans).

2.14.2 Response

Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, provides a discussion of the overall framework to prevent, plan for, and respond to an oil spill, fire, or explosion. As noted in Section 4.2.3, *What framework prepares for responses to an incident?* the framework for responding to an incident is a well-established and coordinated system formalized at the national, regional, state, and facility level. Depending on the size of the release, the location, and specific circumstances of the incident, the response efforts and parties involved can vary. However, local and state fire, police, or emergency responders are likely to be the first responders to an incident, regardless of the location.

It is expected that first responders from the local jurisdictions or the railroad emergency response team would assume the same posture for a crude oil or other hazardous material spill on the rail—defensive and protective. The local responders would do what is necessary to evaluate and report on the situation, keep themselves and the public safe, and monitor response and cleanup operations for compliance with local ordinances and permits. Depending on the severity of the incident, when considering impacts on public health and the environment, the U.S. Environmental Protection Agency, U.S. Coast Guard, and Ecology may take a more aggressive role in the initial response operations to ensure that the responsible party is taking appropriate and timely action to mitigate damages to the environment.

As noted in Section 4.2.3, most of the fire departments in the study area do not have specifically designated hazardous materials teams. This information is based on discussions with local emergency service responders. Final EIS Chapter 4 has been revised to clarify existing local response capabilities and potential impacts associated with the demand for these services under the no-action alternative and the proposed action.

To address, in part, the lack of hazardous materials response capabilities at the local level, Draft EIS Sections 4.4.3, 4.5.3, and 4.6.3, include proposed mitigation measures for the applicant to ensure that response equipment is located at key points in the study area and to establish formalized notification protocols at the local level in the case of an incident. To further address these gaps, additional proposed mitigation measures are included in the Final EIS. These measures include providing additional firefighting equipment, spill response and recovery equipment, and other tools, and annual emergency response training opportunities to local jurisdictions. Additionally, the Final EIS proposes a mitigation measure for the applicant to gather data to improve modeling capabilities, which would in turn help to inform response actions in the event of an incident.

Draft EIS Chapter 4 also addresses the existing planning framework that facilitates a coordinated emergency response for facility, rail, and vessel incidents, including as it relates to the proposed action. As noted in Section 4.2.2, *What framework prepares for an incident?* formalized planning is required by federal and state regulations and requires participation by a diverse group of stakeholders.

Broader planning documents include the Northwest Area Contingency Plan, geographic response plans, local emergency plans, and the applicant contingency planning requirements. Each plan is written for a specific area (e.g., the Chehalis River or Grays Harbor) and includes tactical response strategies tailored to a particular shore or waterway at risk of injury from oil. At the broader regional level, these plans help coordinate response efforts by the responsible party and federal and state agencies. Although these plans contain information that would inform emergency preparedness and response planning in the event of an incident associated with the proposed action, review of and comment on these plans is not within the scope of the EIS. As noted in Draft EIS Chapter 3, Section 3.0, *Introduction*, the Draft EIS does consider the effectiveness of existing regulations, plans, and available resources, in the analysis of impacts. And as discussed in Section 4.2, *Applicable Regulations*, the response framework would consider the specific conditions at the time of an incident to inform the best procedure for containing and responding to an oil spill.

Beyond the facility planning required of the applicant, Chapter 4 identifies other measures that would ensure broader prevention, preparedness, and response planning among the appropriate stakeholders and that would ensure updates to any plans applicable to reducing risks related to the proposed action contain appropriate applicant information and participation. To the extent possible, within the regulatory framework for developing mitigation as described in the Master Response for Mitigation Framework, measures addressing the need for more coordinated and focused planning include the role of the applicants as appropriate.

Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances of an incident, there remains a need for improved emergency response capabilities within the study area and the potential for significant environmental impacts.

2.15 Liability and Responsibility for Incidents

2.15.1 Comment

Commenters requested that the Final EIS clarify the limits of liability for oil spills under federal and state regulations; what types of damages responsible parties would be liable for in the event of a spill; requirements for financial assurance or proof of the financial capability of operators to pay damages resulting from a spill; and how cleanup costs would be paid if the responsible party is unable to cover the full cost.

2.15.2 Response

Liability is established through federal and state regulations as discussed in Draft EIS, Chapter 4, Sections 4.4, 4.5, and 4.6 and in detail below. These regulations establish levels of financial responsibility for cleaning up the spilled oil. Additionally, federal and state law provide for recovery of natural resources damages, which extends beyond the immediate costs of clean up and may include the costs to restore and replace the resource, compensation for lost uses of the resource and trustee assessment costs. Revisions related to updated requirements related to the demonstration of financial responsibility have been incorporated into Chapter 4 of the Final EIS.

2.15.2.1 Liability and Levels of Financial Responsibility

In general, the polluter is responsible for costs and damages associated with oil spills, which in the case of the proposed action would be the applicant for incidents at the project site, the rail operator for incidents that occurred during rail transport, or vessel operators for incidents occurring during vessel transport.

Terminal (Onsite) Operations

Washington State law requires owners or operators of facilities to provide evidence of financial ability to clean up and pay for damages that might occur during a reasonable worst-case spill of oil into the navigable waters of the state. A proposed mitigation measures has been included in Section 4.4.3.2, *Applicant Mitigation*, to conduct a study to identify an appropriate level of financial responsibility for the potential costs for response and cleanup of oil spills, natural resource damages, and costs to state and affected counties and cities for their response actions. The study would be conducted consistent with RCW 88.40 and 90.56 as well as the decision in *Quinault Indian Nation v. Imperium Terminal Servs*, 190 Wn. App. 696 (2015). Proof of financial responsibility will be included as documentation in the applicant's contingency plan. This and other mitigation measures would be enforceable through any permits or other approvals issued for the proposed action. The federal government has established limits on the financial responsibility. Washington State places no limits on liability of recovery of cleanup costs and natural damages beyond the federal limit (Table 2-5).

Table 2-5. Federal and State Level of Financial Responsibility for Spill Removal Costs

Reference	Applicability	Level of Financial Responsibility
Onshore facilities		
Title 33 CFR §138.230(c)	Onshore facilities	$633,850,000 (maximum)
RCW 88.40	Onshore facilities	Washington State has not yet established a level of financial responsibility
Tank vessels (double hull only)		
Title 33 CFR §138.230(a)(1)(ii)	For a tank vessel greater than 3,000 gross tons	The greater of $2,200 per gross ton or $18,796,800 (maximum)
Title 33 CFR §138.230(a)(1)(iv)	For a tank vessel less than or equal to 3,000 gross tons, other than a single-hull tank vessel	The greater of $2,200 per gross ton or $4,699,200 (maximum)
RCW 88.40	For all tank ships and tank barges equal to or greater than 300 gross tons	$1 billion (minimum)
RCW 88.40	Tank barges less than 300 gross tons	Greater of $2 million or $3,000 per barrel for persistent oil (minimum)
Rail operators		
RCW 81.04.560 WAC 480-62-300	Rail operators that transport crude oil in Washington	Sufficient amount to cleanup a reasonable worst case spill of oil based on a minimum cost of $16,800 per barrel multiplied by the percentage of the largest train load of crude oil, as measured in barrels, moved by that company in the previous calendar year as described by: [(maximum operating speed/65)^2 = reasonable worst case percent]

[a] Washington state liability amounts that are noted for vessels are minimum requirements although in the event of an oil spill from a vessel or facility the law allows for unlimited liability. Washington does not have its own certification program for financial responsibility, but rather relies on federal and other states' programs to certify vessels for financial responsibility.

Source: http://www.ecy.wa.gov/programs/spills/preparedness/FinancialResponsibility.html

Rail Transport

Response and cleanup of spills from rail cars that threaten the navigable waters or adjoining shorelines are the responsibility of the owner or operator (also referred to as the *shipper*) of the rail cars carrying the crude oil (RCW 88.40, Transport of Petroleum Products—Financial Responsibility). RCW 81.04.560 requires railroad companies to provide financial assurance of their ability to pay damages in the event of a spill or accident involving crude oil transportation in Washington State. The Washington Utilities and Transportation Commission administers this requirement and recently approved regulations (TR-151079, effective on March 11, 2016) that require rail operators transporting crude oil in Washington State to include a statement in an annual

report that they carry sufficient insurance to cover any losses resulting from a reasonable worst case spill (revised WAC 480-62-300).[17]

If the spill from a train car does not reach or threaten navigable waters, the federal Resource Conservation and Recovery Act (42 United States Code [U.S.C.] 6901) as well as the Federal Comprehensive Environmental Response, Compensation, and Liability Act (42 U.S.C. 9607), and the Natural Resource Damage Act (43 CFR Part 11) provide mechanisms for the State to obtain compensation from the responsible party for cleanup and environmental restoration, and liability provisions for criminal and civil penalties.

Washington State places no limits on liability of polluters to third parties, allowing recovery of cleanup costs and natural resource damages beyond the federal limit (Table 2-5).

Vessel Transport

Washington State law requires the operators of tankers and tank barges transporting hazardous substances to provide evidence of financial responsibility. Under RCW 88.40.020, Evidence of Financial Responsibility, tank vessels that transport oil in bulk as cargo must demonstrate financial responsibility to pay at least 1 billion dollars. With a few limited exceptions, federal law requires vessel operators (all types of vessels) to have a Certificate of Financial Responsibility for vessels over 300 gross tons using the navigable waters of the United States (33 CFR 138.15). Washington State places no limits on liability of third parties, allowing the state to recover cleanup costs and natural resource damages beyond the federal limit (Table 2-5).

Federal and State Framework Establishing Liability

As noted above, federal and state regulations establish the liability for financial responsibility and the processes for covering costs of clean up and natural resources damages as discussed below.

Federal Regulations

Federal legislation related to liability for oil spills with the potential to reach waters of the United States is contained in the Oil Pollution Act of 1990 (33 U.S.C. 2701-2761).

Oil Pollution Act Section 1002(b)(2) (33 U.S.C. §2702) identifies the costs that spillers are liable for. Covered removal costs and damages are as follows.

1. Removal costs: all removal costs incurred by the U.S., a state, or an Indian tribe; any removal costs incurred consistent with the National Contingency Plan (40 CFR 300).
2. Damages:
    a. Damages for injury to, destruction of, loss of, or loss of use of, natural resources, including the reasonable costs of assessing the damage, which shall be recoverable by a U.S. trustee, a state trustee, an Indian tribe trustee, or a foreign trustee.
    b. Damages for injury to, or economic losses resulting from destruction of, real or personal property.

[17] Revised WAC and rulemaking timeline available: http://www.utc.wa.gov/docs/Pages/RailSafetyRulemaking151079.aspx>).

c. Damages for loss of subsistence use of natural resources, which shall be recoverable by any claimant who so uses natural resources which have been injured, destroyed, or lost.

d. Damages equal to the net loss of taxes, royalties, rents, fees, or net profit shares due to the injury, destruction, or loss of real property, personal property, or natural resources, which shall be recoverable by the U.S., a state, or a political subdivision.

e. Damages equal to the loss of profits or impairment of earning capacity due to the injury, destruction, or loss of real property, personal property, or natural resources.

f. Damages for net costs of providing increased or additional public services during or after removal activities, including protection from fire, safety, or health hazards, caused by a discharge of oil, which shall be recoverable by a state, or a political subdivision of a state.

When the responsible party is not identified or cannot pay, the federal government must step in and cover the costs of an oil spill cleanup and damages using the Oil Spill Liability Trust Fund, as authorized by the Oil Pollution Act. The National Pollution Funds Center administers the fund that can be used to pay for federal and state costs for oil removal when a discharge occurs or for reimbursements related to third-party claims for uncompensated removal costs and damages when a responsible party does not pay.

Claims to the Oil Spill Liability Trust Fund are payable only from the fund, and payments are limited by the available balance. For any single discharge incident, the fund is authorized to pay no more than $1 billion, of which no more than $500 million may be paid for natural resource damages (NPFC 2015: 2).

The Natural Resource Damage Assessment is the legal process that federal agencies, tribes, and states use to assess the impacts of oil spills on natural resources to determine the extent of the natural resources damages and the type and amount of restoration required. This includes restoring the public's lost use of the affected natural resource. In Washington the process for determining damages from an oil spill is defined in the Oil Spill Natural Resources Damage Rule (WAC 173-183).

State Regulations

Washington State law (RCW 88.40 and 81.04.560) requires the party responsible for a spill of oil or hazardous substances to state waters to pay for the following costs.

- Their own costs to cleanup and remove oil spills.
- Damages to persons or property, including natural resources.
- Reimbursement to the state for necessary expenses for investigating, containing, removing, or treating oil related to an incident.

The responsible party may also be required to pay a penalty for violation of state law or rule.

If a spiller is unable to fully pay for cleanup costs and damages to public resources, the State would file a request to recover cleanup and damage costs from the federal fund described above. The State requires industry to describe their damage claims process in the oil spill contingency plans.

2.16 Cumulative Impact Analysis

2.16.1 Comment

Commenters indicated that the Draft EIS should evaluate cumulative impacts on all resources considered in Chapters 3 and 7 and in the context of all crude oil projects in the state.

2.16.2 Response

Chapter 6, *Cumulative Impacts*, presents the analysis of the incremental addition of impacts from the proposed action to impacts from past, present, and reasonably foreseeable future actions—including the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project. In general, the scope of the cumulative impacts analysis is limited to those resources on which the proposed action could have significant impacts in combination with other past, present, and reasonably foreseeable and similar future actions, based on the analyses in Chapter 3, *Affected Environment, Impacts, and Mitigation*, and Chapter 4, *Environmental Health and Safety*. Consequently, the resources analyzed for cumulative impacts in Chapter 6 include air, noise and vibration, tribal resources, rail traffic, vehicle traffic and safety, vessel traffic, environmental health and safety.

The Draft EIS identifies the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project as reasonably foreseeable future actions; therefore, these projects along with the proposed action are considered cumulative projects for the analysis in Chapter 6. As noted in Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, the proposed action could result in an incremental increase in the chance of an incident above existing and no-action risk levels in the extended study area, individually and cumulatively. However, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions or the no-action alternative, Because the potential adverse environmental impacts related to rail and vessel transport in the extended study area under existing and no-action conditions are not expected to change as the result of the proposed action, the Draft EIS considers the potential impacts in qualitative terms and acknowledges the potential for impacts to be similar to those that could occur related to the proposed action as described in Chapter 4, Section 4.7, *Impacts on Resources*.

Project-specific impacts of the REG Expansion Project are presented in the Draft EIS for that project; project-specific impacts of the Grays Harbor Terminal Expansion Project or any other future project proposed at that site would be assessed as appropriate under that proposed action's SEPA review process.

2.17 Economics, Social Policy, and Cost-Benefit Analyses

2.17.1 Comment

Commenters indicated that the scope of the analysis for the resources in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, was too narrow and should be expanded. Commenters said

the economic analysis should be more detailed and include potential costs to individuals that could be affected by the proposed action. Commenters indicated that the potential for social policy impacts should also be more detailed and include an assessment of human health impacts. Commenters asked for the cost-benefit analysis to be expanded beyond Hoquiam. Commenters indicated that all elements addressed in Chapter 7 should be expanded to address impacts related to the increased risk of oil spills, fires, and explosions.

2.17.2 Response

SEPA Rules (WAC 197-11-444) do not require that an EIS analyze the economic or social policy impacts of an action. The rules (WAC 197-11-448) state,

> SEPA contemplates that the general welfare, social, economic, and other requirements and essential considerations of state policy will be taken into account in weighing and balancing alternatives and in making final decisions. However, the environmental impact statement is not required to evaluate and document all of the possible effects and considerations of a decision or to contain the balancing judgments that must ultimately be made by the decision makers. Rather, an environmental impact statement analyzes *environmental* impacts and must be used by agency decision makers, along with other relevant considerations or documents, in making final decisions on a proposal.

Additionally, the rules (WAC 197-11-450) state that a cost-benefit analysis is not required. However, the Hoquiam Municipal Code (HMC 11.10) states,

> "the following additional elements are part of the environment for the purpose of EIS content, but do not add to the criteria for threshold determinations or perform any other function or purpose. (1) Economy; (2) Social policy analysis; (3) Cost-benefit analysis."

In other words, this information is provided for informational purposes. Based on this regulatory requirement, the Draft EIS addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action and the no-action alternative as directed by the co-lead agencies. Therefore, Chapter 7 focuses on the following issues specific to the proposed action alone.

- Section 7.1, *Economics,* provides the regional (state- and countywide) economic context for the proposed action and identifies the employment, income (including benefits), and economic output that would be generated in the region by the proposed action during construction and routine operation.
- Section 7.2, *Social Policy,* considers elements of community and social structure that could be affected by the proposed action, including community cohesion, community welfare, and population growth, and identifies potential disproportionate impacts on minority and low-income communities within the study area.
- Section 7.3, *Cost-Benefit Analysis*, provides an analysis of the costs and benefits of the proposed action, relevant to the City of Hoquiam. Specifically, it considers the costs and benefits that would affect the residents of Hoquiam and the city at large as well as resources in Aberdeen to the extent that job creation in Aberdeen would affect the residents of Hoquiam. Impacts are expressed in monetary terms where feasible and are otherwise presented qualitatively. The cost-benefit analysis is based on the analysis of impacts presented in Chapter 3, *Affected Environment, Impacts, and Mitigation*. Impacts of the proposed action related to increased safety risks (e.g., storage tank failure, train derailments, vessel collisions) are also considered, based on the analysis in Chapter 4, *Environmental Health and Safety* as discussed below.

The general approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill. Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns*, reflects additional information on the economic and social costs of oil spills. This includes information on derailments and other accidents involving trains carrying crude oil and information on a crude oil spill during marine transport. However, because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 7.3.4.2, describes the range of impacts that could be expected in general terms.

Chapter 3
Agencies

This chapter presents responses to agency comments on the Draft EIS.

3.1 Federal Agencies

The federal agencies listed in Table 3-1 submitted comments on the Draft EIS. These comments and responses to those comments are presented after the table. Master responses were developed to address commonly raised comments and are presented in Chapter 2, *Comment Themes and Master Responses*.

The responses refer to the Draft EIS unless information has been revised, in which case the Final EIS is specified.

Table 3-1. Comment Letters Submitted by Federal Agencies

Number	Agency (Name)
FA-1	Bureau of Indian Affairs, David Redhorse
FA-2	United States Department of Agriculture, Forest Service Columbia River Gorge National Scenic Area, Lynn Burditt
FA-3	United States Department of Commerce, National Oceanic and Atmospheric Administration, Olympic Coast National Marine Sanctuary, Carol Bernthal
FA-4	United States Department of Interior, Fish and Wildlife Service, Washington Fish and Wildlife Office, Eric V. Rickerson
FA-5	United States Department of Interior, National Park Service, Pacific West Region, Palmer Jenkins

FA1, Bureau of Indian Affairs, David Redhorse

Comment FA1-1

Proposed increase in vessel traffic substantially impacts Indian treaty fishing rights. Tribes with treaty rights are adverse to any actions that affects treaty rights. No solution is offered (except to stop fishing activities).

Response FA1-1

Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, describes potential impacts on tribal resources and proposes mitigation measures to address these impacts. Implementation of these measures could reduce but would not completely eliminate the potential for impacts on tribal resources.

FA2, U.S. Department of Agriculture, Forest Service Columbia River Gorge National Scenic Area, Lynn Burditt

Comment FA2-1

United States Department of Agriculture
Forest Service
Columbia River Gorge National Scenic Area

902 Wasco Avenue Suite 200
Hood River, OR 97031
541-308-1700
FAX: 541-386-1916

File Code: 1950
Date: November 30, 2015

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

To Whom It May Concern,

The USDA Forest Service, Columbia River Gorge National Scenic Area, appreciates the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Westway and Imperium Terminal Expansion Projects.

In May of 2014 we provided comments during the scoping period for this environmental impact statement process. Our comments focused on the transport of crude oil by rail through the Columbia River Gorge National Scenic Area that would be associated with the Westway and Imperium Projects. We requested that the DEIS fully evaluate the potential for direct, indirect, and cumulative effects to the environment, fire risk, and public safety along this section of rail line. We also requested that you address the fact that the Westway and Imperium Projects are among several other proposed oil distribution projects currently undergoing environmental review, all of which would contribute cumulatively to a substantial increase in rail transport of hazardous crude oil through the Columbia River Gorge. The DEIS addresses some of these concerns, but the analysis is not sufficient to fully inform a decision maker about the project's potential impacts to the Columbia River Gorge.

The primary study area for the DEIS covers the area on and near the project site in Hoquiam, Washington; resources along the PS&P rail line from Centralia, Washington, to the project site; and resources in and around Grays Harbor. The DEIS concludes that “A large oil spill, fire, or explosion would likely cause unavoidable and significant adverse environmental impacts. The likelihood of a large spill or related fire or explosion is relatively low; however, the potential for significant consequences to the environment and human health if such an incident were to occur is high.” (DEIS at S-19).

Chapter 5 of the DEIS does include an impact analysis of the potential effects of rail transport of crude oil in the rail traffic extended study area. This extended study area covers the BNSF Railway

main line system in Washington State, including the Columbia River Gorge route, which traverses the Columbia River Gorge National Scenic Area (CRGNSA) along the north shore of the Columbia River. The impact analysis generally concludes the "potential impacts along the BNSF main line are likely similar to those that would occur along the PS&P rail line and the magnitude of impacts would be roughly proportional to the incremental increase in traffic under the proposed action." (DRIS at 5-2). On this basis, the impacts analysis for the extended rail study area explicitly excludes impacts to resources, and focuses on rail traffic only. The impacts analysis for the extended rail study area does not consider scenic, natural, cultural, or recreational resources, or any other conditions unique to the Columbia River Gorge. Examples of these resources and conditions include salmon species listed under the federal Endangered Species Act (bull trout, chinook, chum, coho, sockeye and steelhead), endemic plant species, the area's deep tribal and cultural history, and the high levels of public recreation concentrated along the Columbia River shoreline. Washington State Route 14, which runs adjacent to the BNSF rail line throughout most of the Gorge, is the primary access route to and from many Gorge communities, for both residents and emergency responders. While we greatly appreciate the fact that the DEIS includes the extended rail study area, the risks and impacts to Gorge-specific resources and conditions are not adequately addressed in the impacts analysis.

The DEIS states that increased rail traffic in the extended rail study area could result in increased emissions from more diesel trains; increased noise at grade crossings and along the route; increased vehicle delay at grade crossings, including disruption to emergency vehicle response times; and increased risk of a derailment, spill, or fire/explosion involving rail cars. The analysis compares project-related increases in rail traffic to 2035 projections in the Washington State Rail Plan, and concludes, "Rail traffic related to the proposed action would account for a small percentage of BNSF rail traffic in Washington State: approximately 2% of the expected 2035 capacity estimated by the Washington State Department of Transportation for the main line along the Interstate 5 corridor and approximately 3% along the Columbia River Gorge" (DEIS at S-26).

The Washington State Rail Plan indicates that rail volumes in 2035 are expected to be more than double those in 2010, and this forecast does not take into account the several other current proposals for new or expanded oil or coal distribution terminals. Assessing the project-related increase in rail traffic expressed as a percent of projected rail capacity in 2035 does not adequately reflect either the effects of the Westway and Imperium projects on current rail traffic, or how the proposed action would affect the current condition in terms of the increased risks to resources and public safety associated with rail transport of crude oil. Based on information in the DEIS that the Westway and Imperium projects would result in up to 458 unit train trips per year, of which one half would be loaded trains most likely travelling to the facility through the Columbia River Gorge rail route, there would be a quantitative increase over current conditions of approximately 229 loaded unit trains travelling this route, with an equivalent increase in risks to resources and public safety. The DEIS states that there are approximately 998 loaded unit oil trains currently moving through Washington State each year, and that most loaded trains use the Columbia River Gorge route. These numbers indicate a much larger impact on rail traffic and associated risks in the Gorge than the DEIS suggests.

In summary, while the Westway and Imperium DEIS does include an analysis of the effects of increased rail traffic in an extended area beyond the immediate project area, the analysis presented in the DEIS does not adequately represent or fully address the project's potential impacts to the Columbia River Gorge. We request you ensure the FEIS appropriately considers these effects and the likely cumulative potential associated with the various projects that would be impacting this travelway.

Sincerely,

Lynn Burditt
Area Manager

Response FA2-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts, described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

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FA3, U.S. Department of Commerce, National Oceanic and Atmospheric Administration, Olympic Coast National Marine Sanctuary, Carol Bernthal

Comment FA3-1

UNITED STATES DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
OFFICE OF NATIONAL MARINE SANCTUARIES
Olympic Coast National Marine Sanctuary
115 East Railroad Avenue, Suite 301
Port Angeles, WA 98362-2925

November 30, 2015

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

Re: Comments on Westway and Imperium facilities DEISs

This letter provides comments on the draft environment impact statements (DEISs) for the proposed Westway and the Imperium Bulk Expansion Projects in Grays Harbor. We appreciate the seriousness with which the Washington Department of Ecology and the City of Hoquiam are addressing these controversial projects. The shifting trade patterns related to the shipment of crude oil in the United States and Canada and its implications for public and environmental safety is a concern for all of us.

Olympic Coast National Marine Sanctuary (OCNMS or sanctuary) was designated in 1994 as one of our nations marine protected areas, spanning 3,189 square miles of marine waters off the western Olympic Peninsula. The sanctuary is home to many species of marine mammals and seabirds, diverse populations of kelp and intertidal algae, productive commercial and recreational fisheries and thriving invertebrate communities. Along this coast are hundreds of islands where many of the largest seabird breeding colonies in the region thrive under the federal protection provided by the Washington Islands National Wildlife Refuges. The mainland shore adjacent to the sanctuary is owned by Native Americans (the Makah, Ozette, Quileute, Hoh, and Quinault Reservations) or Olympic National Park. South of the Quinault Reservation, the shoreline is designated as the Washington State Seashore Conservation Area. The Grays Harbor estuary hosts concentrations of wildlife and is a seasonally important feeding or foraging area for wildlife. The estuary is a critical nursery and foraging area for juvenile salmonids and Dungeness crab. Commercial aquaculture and wild capture fisheries are a large part of regional economy. The various natural and cultural resource conservation designations along this coast substantiate the ecological importance of this special place. In addition, the economies of outer coast communities are strongly reliant on the abundance of natural resources to support commercial fisheries.

Although the Westway and Imperium projects are not within the sanctuary, products spilled in Grays Harbor could flush from the estuary and be carried into sanctuary waters and onto adjacent shorelines. In addition, each of these projects anticipates a significant increase in petroleum product transport through Grays Harbor and along the outer Washington coast, which increases the risk for petroleum spills in open ocean areas. Our primary concern with the proposed projects, as it relates to our mandate to protect sanctuary resources, is the increased risk of petroleum product spills into estuary and marine waters, and the private and public capacity to respond effectively in the event of a spill with potential to affect the sanctuary.

Response FA3-1

As noted in the comment and discussed in Draft EIS Chapter 4, Section 4.6, *Environmental Health Risks—Vessel Transport*, and Appendix N, *Oil Spill Modeling*, there is the potential for spilled oil to travel outside the harbor and move up or down the coast depending on conditions present at the time of the spill. Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from offsite rail and vessel transport in the extended study area, from the likely source of crude oil to the like destinations. The Olympic Coast National Marine Sanctuary is within the extended study area identified in Section 5.1, *What is the extended study area for rail and vessel transport?*

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts, described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment FA3-2

In our May 27, 2014 letter on the scoping for this project we provided recommendations and requested a strong focus on "Oil spill prevention, preparedness, response" and "Vessel Traffic". While our review of the DEISs focused primarily on these topics, we have also commented on the cost-benefit analysis. Based on this review, we have two specific recommendations for improving your analysis that we would like to see in both Final Environmental Impact Statements.

SOCIOECONOMIC IMPACTS

Chapter 7, "Economics, Social Policy, and Cost-Benefit Analysis", focuses primarily on resources under the purview of the City of Hoquiam that could be affected by the proposed action alone. By limiting the analysis in this way we believe the DEIS underestimates costs associated from the project from impacts and risks that are documented in Chapter 3, "Affected Environment, Impacts, and Mitigation" and Chapter 4, "Environmental Health and Safety". There are costs associated with these risks that are not accounted for in your analysis. These costs represent a negative externality, which if not accounted for could result in Washington Stale and the City of Hoquiam having to make difficult permitting decisions without a true picture of the cost and benefits. We recommend that the FEIS include the costs associated with the impacts from Chapter 3 and the risks from Chapter 4, to provide a more accurate and complete assessment of the costs and benefits.

Response FA3-2

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of

associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment FA3-3

RISK OF OIL SPILLS

We appreciate the challenges associated with evaluating the increased risk of an oil spills that come with an increase in oil transport traffic. While the scenario in Chapter 4, "Environmental Health and Safety", that evaluates the potential release of 15.1 million gallons (360,000 barrels) of crude oil and vessel fuel from a vessel at the entrance to Grays Harbor would have the largest impact, all of the scenarios would have the potential of harming sanctuary resources. This fact is not clear from your modelled scenarios. Your analysis stops after 48 hours and before you would start seeing significant shoreline impacts. By stopping the model after 48 hours, potential impacts are underrepresented.

The winds used in the scenarios are based on winds from Hoquiam/Bowerman Airport (8-10 mph). These averages appear to be significantly lower than winds typical for the coast of Washington. More accurate estimates could be determined by reviewing data from NOAA National Data Buoy Center Stations WPTW1-9441102-Westport, and Station 46041-Cape Elizabeth. In addition, when evaluating risk it would be more useful to consider worst case scenarios. When it comes to wind speed and sea conditions it is more likely that an incident would occur during a period of degraded versus average conditions.

One only needs to look to the real life incident of the 1988 Nestucca oil spill to understand how an oil spill at the entrance to Grays Harbor could impact the Washington Coast. That real-life spill, which you note in Attachment A-Appendix N released 90,972 gallons (2,166 barrels) of diesel oil (0.6% the volume of your scenario), impacted an estimated 95 miles of shoreline. We recommend that in the FEIS you broaden your Oil Spill Modelling to include a more realistic range of wind speeds and to extend out the modeling for a longer period of time showing where the spilled oil would land on the coast.

We appreciate the opportunity to provide comments on these proposed projects.

Sincerely,

Carol Bernthal
Sanctuary Superindendent

Response FA3-3

Draft EIS Appendix N, *Oil Spill Modeling*, explains the methods, inputs, and assumptions used in the oil spill modeling. As noted in Appendix N, the modeled scenarios were based in part on regulatory requirements defining worst-case releases and were modeled over 24- and 48-hour increments to match Washington State planning standards for oil spill response trajectory analysis and equipment (WAC 173-182-405). To improve the ability to respond to an oil spill in Grays Harbor, Final EIS Chapter 4, Final EIS Chapter 4 reflects additional mitigation measures proposed to address gaps in emergency preparedness planning and response capabilities. These measures include the provision

of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

Refer to the Master Response for Oil Spill Modeling Methods for more information regarding the purpose, approach, assumptions, scenarios, and inputs for oil spill modeling, including the limitations and applicability of the modeling results.

FA4, U.S. Department of Interior, Fish and Wildlife Service, Washington Fish and Wildlife Office, Eric V. Rickerson

Comment FA4-1

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington Fish and Wildlife Office
510 Desmond Dr. SE, Suite 102
Lacey, Washington 98503

In Reply Refer To: 01EWFW00-2014-CPA-0020

Westway and Imperium Projects EISs
c/o ICF International
Attn: D. Butorac; B. Shay
710 Second Avenue, Suite 550
Seattle, Washington 98104Dear Ms. Butorac and Mr. Shay:

On August 31, 2015, the Washington State Department of Ecology (Ecology) and City of Hoquiam, Washington (City) announced the release of two Draft Environmental Impact Statements (EISs) addressing redevelopment proposals at the Port of Grays Harbor (Port) in Grays Harbor County, Washington. The Westway Terminal Company LLC (Westway) and Imperium Terminal Services (Imperium) projects each propose to expand their existing bulk liquid storage and distribution facilities located at Terminal 1 on the Port. Westway currently receives and distributes methanol, and Imperium currently receives and distributes biodiesel, petroleum diesel, vegetable oil, and methanol. Both Applicants, Westway and Imperium, propose to construct and operate new bulk liquid storage tanks, new and modified rail spurs, rail-unloading equipment, pumps, pipelines, and tank vessel-loading equipment, with the specific intent of receiving, storing, and transloading unrefined crude oil. Ecology and the City, acting as the Washington State Environmental Policy Act (SEPA) co-leads, have requested any comments for the Draft EISs, discipline reports, and technical appendices by October 29, 2015.

The U.S. Fish and Wildlife Service (Service) has responsibility for managing or co-managing a variety of federal trust resources, including sensitive species which are listed under the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.)(ESA), their habitats and designated critical habitat, federal wildlife refuges, and other fish and wildlife trust resources. Within the study area, including the lower Chehalis River valley and Grays Harbor, these trust resources include the following: 1) Coastal/Puget Sound bull trout (Salvelinus confluentus, threatened), 2) marbled murrulet

(Brachyramphus marmoratu, threatened), 3) western snowy plover (Charadrius alexandrines nivosus, threatened), 4) streaked horn lark (Eremophila alperstris strigata, threatened); 5) designated critical habitat for the bull trout, western snowy plover, and streaked horned lark; 6) the Grays Harbor National Wildlife Refuge (NWR), located at Bowerman Basin directly adjacent to the Port and Grays Harbor navigation channel; 7) shorebird, waterfowl, and migratory bird populations; and, 8) jointly managed Tribal, commercial, and recreational fisheries (fin fish and shellfish). In these portions of Washington State, the Service's roles and responsibilities are administered by the Washington Fish and Wildlife Office (WFWO) located in Lacey, Washington, and the Grays Harbor NWR, headquartered at the Nisqually NWR Complex in Thurston County, Washington.

The Service is also committed to implementing the goals, objectives, and policy principles outlined in our Native American Policy (U.S. Department of the Interior 1994) and Secretarial Order 3206 (U.S. Department of the Interior and U.S. Department of Commerce, 1997). The Service shares in the federal government's responsibility for accomplishing greater recognition and protection of treaty-protected resources and rights.

The Service's WFWO and Grays Harbor NWR have previously provided SEPA scoping comments to Ecology and the City addressing redevelopment proposals at the Port. On May 23, 2014, detailed scoping comments were offered for the Westway and Imperium proposals (FWS Ref. No. 01EWFW00-2014-CPA-0020). On October 30, 2014, detailed scoping comments were offered for a third, similar proposal pending at Terminal 3 on the Port (U.S. Development Group LLC/Grays Harbor Rail Terminal LLC; FWS Ref. No. 01EWFW00-2015-CPA-0001).

The current Westway proposal includes the following (Ecology, City of Hoquiam 2015a, p. S-3):

- Maximum on-site crude oil storage - 42 million gallons (or 1 million barrels).
- Maximum annual throughput - approximately 752 million gallons (or 18 million barrels).
- At maximum throughput, an average of approximately 1.25 crude-by-rail (CBR) unit trains per day (a maximum of approximately 458 unit trains per year).
- At maximum throughput, an average of approximately 1 tank vessel trip every other day (a maximum of approximately 238 tank vessel trips per year).
- The Imperium proposal includes the following (Ecology, City of Hoquiam 2015b, p. S-3):
- Maximum on-site storage - approximately 30 million gallons (or 720,000 barrels).
- Maximum annual throughput - approximately 1.26 billion gallons (or 30 million barrels).
- At maximum throughput, an average of approximately 2.0 CBR unit trains per day (a maximum of approximately 730 unit trains per year).
- At maximum throughput, an average of approximately 1 tank vessel trip per day (a maximum of approximately 400 tank vessel trips per year).

Thank you for the opportunity to review and offer comments for the Draft EISs, and for holding the related recent public meetings and hearings in Elma and Aberdeen, Washington. This letter transmits the Service's comments and concerns regarding the current Westway and Imperium proposals, the Draft EISs, and the unavoidable and significant adverse impacts which have been acknowledged by the SEPA co-leads.

The Service continues to have significant concerns regarding the foreseeable impacts of those actions. The Service believes that the current Westway and Imperium proposals would have

significant adverse impacts to both fish and wildlife and tribal trust resources. Content included in the Draft EISs, discipline reports, and technical appendices strongly suggests that these proposals would have unavoidable and significant adverse impacts, as defined under SEPA, to Tribal Resources, Environmental Health and Safety, Air, and Water. These resources and impacts are discussed in greater detail below.

Response FA4-1

The commenter's specific concerns are addressed individually in the responses below.

Comment FA4-2

Tribal Resources: The SEPA co-leads have acknowledged unavoidable and significant adverse impacts to tribal resources, including exclusion from and/or reduced access to tribal fishing areas. The Draft EISs assess and describe cumulative impacts, including cumulative impacts to vessel traffic and tribal resources. "At maximum throughput, operation of the cumulative projects would add 758 vessel trips . . . along the navigation channel . . . for a total of 1,180 vessel trips, or an average of three per day. This increased traffic, and increased occupancy of the Terminal 1 dock, could disrupt tribal fishing in the navigation channel . . . and adjacent to Terminal 1" (Ecology, City of Hoquiam 2015a, 2015b, p. S-28). To address vessel traffic interactions with tribal fishing access and cumulative impacts to tribal fishing access, the SEPA co-leads and Applicants propose to implement coordination protocols and procedures in the form of docking schedules, announced arrivals and departures, and additional unspecified measures.

The Quinault Indian Nation (QIN) recently wrote and requested that the Service assist in reviewing redevelopment proposals at the Port. The QIN has indicated to us that ". . . impacts to treaty rights cannot be fully mitigated" (QIN 2015). The Service agrees that the QIN's conclusions and significant concerns are warranted.

Response FA4-2

Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, concludes the following with respect to potential for impacts on tribal fishing in Grays Harbor: " . . . vessels related to the proposed action would travel through usual and accustomed fishing areas in Grays Harbor. Under current and future conditions, increased vessel traffic could restrict access to tribal fishing areas in the navigation channel and adjacent to Terminal 1. This conflict is most likely to occur for fishing related to harvest of salmon, steelhead, and sturgeon. Because other factors besides vessel operations affect fishing opportunities, such as the number of fishers, fish distribution, timing, and duration of fish windows, the extent to which vessel operations related to the proposed action would affect tribal fishing is difficult to quantify. No mitigation measures would completely eliminate the possibility of impacts on fishing resources resulting from vessel operations related to the proposed action."

Comment FA4-3

Environmental Health and Safety: The Draft EISs assess and describe a number of spill scenarios, including "small", "medium", and "large" spills that might potentially occur on-site and along the transport corridors. Summarizing their conclusions for on-site spill potential, the SEPA co-leads have indicated that small spills during rail and vessel loading/unloading are likely; the potential for medium-sized spills, involving 10,000 to 50,000 gallons, is considered an intermediate risk; and,

large spills are considered unlikely. Small and medium-sized spills involving vessel loading are likely to reach water, and to have moderately-severe or severe impacts. Large on-site spills are likely to reach water and would have severe impacts.

Regarding rail transport spill potential, the co-leads have indicated that small and medium-sized spills are likely (less than 30,000 gallons), and the potential that these spills would reach water is considered an intermediate risk; large spills, involving 90,000 to 900,000 gallons, are described as unlikely, but are likely to reach water and would have severe impacts. Regarding vessel transport spill potential, the co-leads have indicated that large spills are unlikely, but are certain to reach water and would have severe impacts.

The Draft EISs provide a reasonable, generic characterization of spill potential, both on-site and along the transport corridors. The Service agrees with the findings of the SEPA co-leads, that some spill scenarios, resulting impacts, and damages are likely to occur over the functional lives of the proposed facilities (e.g., 20 to 50 years, or more). The Service agrees that large or very large spills are less likely, but resulting impacts and damages would be severe.

We conclude that the current Westway and Imperium proposals are likely to result in spills. Resulting adverse impacts to fish and wildlife and tribal trust resources are reasonably certain to occur. Some of these spills and adverse impacts could result in "take" under the ESA [Sections 3(19) and 9(a)(1)] and/or adversely affect designated critical habitat.

Response FA4-3

Draft EIS Chapter 4, *Environmental Health and Safety*, acknowledges the potential for a spill of crude oil to occur related to the proposed action. As noted in Section 4.7, *Impacts on Resources*, depending on the extent and location of the spill, there is the potential for significant adverse environmental impacts. In the event of "take," as defined in Section 9 of the Endangered Species Act, the responsible party would be required to comply with the applicable regulations pursuant to the act. As part of the incident command system, federal and state agencies would be involved in the response and cleanup actions.

Comment FA4-4

Air and Water: Available information strongly suggests that these proposals have unavoidable and significant adverse impacts to air and water. The Westway and Imperium proposals would increase toxic air pollutant emissions from both stationary and mobile sources, including diesel particulate matter. These emissions and particulates deposit on surfaces and are typically washed into surface runoff and receiving waters.

Response FA4-4

No information was provide to support this comment. Draft EIS Chapter 3, Section 3.2, *Air*, and 3.3, *Water*, describe potential impacts on air and water resources, respectively. Based on the analysis in Section 3.3, construction and routine operation of the proposed action would have not significant and unavoidable adverse impacts on water. Final EIS Section 3.2 reflects revised emissions estimates based on information provided by PS&P in its comments on the Draft EIS regarding rail operations Based on the revised analysis, construction and routine operation of the proposed action would have no significant and unavoidable adverse impacts on air.

Comment FA4-5

Greenhouse gas emissions contribute to observed trends toward increasing global average sea temperatures and ocean acidification. These trends are a threat to marine food webs, sensitive marine and coastal resources, and Tribal, commercial, and recreational fisheries.

According to the SEPA co-leads, "cumulative greenhouse gas emissions for operations and transportation [i.e., exclusive of refining and combustion] would be approximately 103,753 metric tons per year", and ". . . greenhouse gas emissions from the cumulative projects [would] contribute to climate change at the global level" (Ecology, City of Hoquiam 2015a, 2015b, p. S-27). "Using [the U.S. Environmental Protection Agency's] average heat content of crude oil . . . and a more conservative emissions factor . . . .the maximum amount of CO2 emissions from end use of products shipped through the proposed facility in a given year is 7,796,882 metric tons of CO2 per year" (Ecology, City of Hoquiam 2015a, p. 3.2-20), and ". . . is 13,067,400 metric tons of CO2 per year" (Ecology, City of Hoquiam 2015b, p. 3.2-21).

Response FA4-5

Comment acknowledged.

Comment FA4-6

We conclude that the current Westway and Imperium proposals are likely to have unavoidable and significant adverse impacts to air, water, and sediment quality. The proposals would emit, directly, indirectly, and cumulatively, large quantities of greenhouse gases and toxic air pollutants. These emissions would threaten the quality and function of fish and wildlife habitats along the lower Chehalis River valley, in Grays Harbor, and beyond. Foreseeable adverse impacts to environmental health and safety, air, and water are likely to result in damage to both fish and wildlife and tribal trust resources.

Response FA4-6

Refer to Response to Comments FA4-3 and FA4-4. Final EIS Chapter 6, *Cumulative Impacts*, also reflects revised emissions from the cumulative projects based on rail operation information from PS&P.

Comment FA4-7

The Service is aware that communities and a concerned public throughout the study area voiced concerns regarding transport safety, security, spill readiness, spill response, and inherent vulnerability along the transportation corridors to and from the Port (Public Meetings and Hearings, Elma and Aberdeen, Washington; October 1 and 8, 2015). We share many of these concerns, and would emphasize the following:

Terminal 1 is located on artificial fills and constructed in-water and over-water structures. There is moderate to severe earthquake potential at the site, and indications that ground movement and/or liquefaction would cause moderate to severe damage to structures, including storage tanks and pipelines. In the event of an offshore earthquake, the site could also be inundated by tsunami waves. Comments - The Service believes that the size of the proposed containment walls is not sufficient to effectively counter the risk of storage tank and pipeline failure at this vulnerable location. The

Service doubts that there is any effective and feasible mitigation that would adequately address vulnerability to earthquakes and tsunami waves.

Response FA4-7

No information was provided to support this comment. As addressed in Draft EIS Chapter 3, Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, all proposed facilities would be required to meet all applicable building standards. Geotechnical engineering and structural design would be required to account for potential geologic hazards, including earthquakes and earthquake-related events such as tsunami and liquefaction. The Master Response for Seismic Risk and Design Requirements describes these requirements, the permitting processes they are tied to, and the applicant mitigation identified to further reduce these potential impacts. The measures include standards to design the proposed facilities to withstand potential tsunami and debris forces without allowing spillage of crude oil to the environment, based on a site-specific tsunami impact modeling and analysis conducted for the proposed action.

Comment FA4-8

- According to the SEPA co-leads and Applicants, no modifications are needed or proposed for the PS&P rail network that would carry CBR unit trains between Centralia and Hoquiam, a distance of approximately 60 miles. The Draft EISs do acknowledge the potential for earthquakes, landslides, liquefaction, and subsidence. Comments - Recent instances of PS&P rail derailments indicate that the existing rail network is vulnerable. Proposals bringing CBR to the Port, including but not limited to the current Westway and Imperium proposals, would present an inherently higher cumulative risk over time of significant hazardous material releases to the terrestrial and aquatic environments. These risks would be particularly significant wherever the rail network traverses over or through wetlands and waters associated with the lower Chehalis, Satsop, Wynochee, Wishkah, and Hoquiam Rivers, including the lower Chehalis River tidal surge plain. The current proposals are reasonably certain to result in adverse impacts and damage to sensitive freshwater, brackish, and/or marine ecosystems. These ecosystems are uniquely diverse, productive, and biologically valuable. Some of these adverse impacts could result in "take" under the ESA [Sections 3(19) and 9(a)(1)] and/or adversely affect designated critical habitat.

Response FA4-8

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant. In the event of "take," as defined in Section 9 of the Endangered Species Act, the responsible party would be required to comply with the applicable

regulations pursuant to the act. As part of the incident command system, federal and state agencies would be involved.

Comment FA4-9

The Grays Harbor navigation channel runs the length of the Grays Harbor NWR at close proximity, lies directly south of Damon Point and the Oyhut Wildlife Recreation Area, and traverses more than 12 linear miles of subtidal estuarine and marine habitat. Comments - The Service continues to have significant concerns regarding proximity of the current Westway and Imperium proposals to the Grays Harbor NWR. The refuge provides habitats for a wide variety of terrestrial and aquatic species, including species listed under the ESA, and supports large numbers of shorebirds and waterfowl. The whole of Grays Harbor is designated as a site of "hemispheric significance" in the Pacific flyway (USFWS 2014), and supports both migratory and resident shorebirds, waterfowl, passerines, and birds of prey. Vast averages of biologically productive and important sand and mud flat, saltmarsh, shallow shoals, sand islands, and spits surround the Port and Grays Harbor navigation channel. The Service believes, and would argue that these are Aquatic Resources of National Importance, per the resource-based threshold factors implementing Section 404(q) of the Clean Water Act (EPA 2011).

Response FA4-9

Draft EIS Chapter 3, Sections 3.4, *Plants*, 3.5, *Animals*, and 3.10, *Recreation*, acknowledge the importance of Grays Harbor Wildlife National Wildlife Refuge for wildlife, ecosystem function and values, and recreational importance. Draft EIS, Chapter 2, *Proposed Action and Alternatives,* notes there is no in-water work requiring evaluation of the proposal pursuant to Section 404 of the Clean Water Act, Section 10 of the Rivers and Harbors Act of 1989, or Section 103 of the Marine Protection, Research and Sanctuaries Act.

Comment FA4-10

The Service also believes that the current proposals would have unavoidable impacts to the visual character of the surroundings, and the refuge user experience.

Response FA4-10

No information is provided to support this statement. Based on the analysis presented in Draft EIS Chapter 3, Section 3. 9, *Aesthetics, Light, and Glare*, construction and routine operation of the proposed action would have no significant impacts on aesthetics, light, or glare.

Comment FA4-11

To address increased on-site and transport spill, fire, or explosion potential, the SEPA co-leads and Applicants propose a number of measures. These measures include structural and procedural spill controls; contingency planning; required personnel training and certification; bonding and financial responsibility requirements tied to emergency response and cleanup; rail car requirements and specifications; manifests classifying and characterizing crude oil properties; tug escorts for tank vessels; coordinated preparation of a formal vessel management system and related procedures; training and certification for tank vessel operators and first responders; and, incident communications. Comments - The SEPA co-leads and Applicants have demonstrated a serious

commitment to ensuring that the proposed bulk liquid storage and distribution facilities operate according to high performance standards. However, the Service believes that the proposed measures are unlikely to succeed in preventing all significant adverse impacts. Over the functional lives of the proposed facilities (e.g., 20 to 50 years, or more), the Service believes that these operations will result in significant spills and adverse impacts. These spills are likely to damage both fish and wildlife and tribal trust resources.

Response FA4-11

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including fish and wildlife and tribal resources.

Comment FA4-12

The SEPA co-leads have acknowledged potential impacts on plants, animals, and their habitats, including those that would result from increased vessel traffic (e.g., wake stranding of salmonids; erosion of sediments, shorelines, and low-lying intertidal vegetation). The Draft EIS acknowledges that vessels pose a risk of introducing nonnative and invasive species, and that ballast water exchange practices and requirements do not fully mitigate those risks.

Response FA4-12

Draft EIS Chapter 3, Section 3.3, *Water*, Section 3.4, *Plants*, and Section 3.5, *Animals*, describe potential ballast water impacts and the regulatory requirements to reduce these impacts. Section 3.4.7.1, *Applicant Mitigation*, and Section 3.5.7.1, *Applicant Mitigation*, propose mitigation measures to further reduce potential impacts.

Comment FA4-13

The SEPA co-leads and Applicants have offered to, "... voluntarily cease vessel-loading operations... 2 weeks each year ... to reduce the potential for impacts on natural resources during the Grays Harbor Shorebird Festival" (Ecology, City of Hoquiam 2015a, 2015b, p. S-10). Comments - The Service continues to have significant concerns regarding the impacts of the current proposals, including foreseeable direct and indirect impacts and damages to fish and wildlife and tribal trust resources. The Service doubts that a two-week pause on vessel-loading would meaningfully or significantly mitigate potential impacts and damages. Any measure intended to significantly mitigate, avoid, or minimize impacts in this way would more likely need to extend over a period of several weeks and/or months (e.g., around the peaks of spring and fall avian migration; around the peak of juvenile salmonid outmigration).

Response FA4-13

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related oil spills that could affect migratory birds in the area during that period, the Final EIS reflects revisions to clarify that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification.

Mitigation measures to reduce and minimize impacts on natural resources that could result from an oil spill during operations at the project site are proposed in Draft EIS Chapter 4, Section 4.4.3, *What mitigation measures would reduce impacts related to terminal operations at the project site?*

Comment FA4-14

According to the SEPA co-leads, "cost-benefit impacts were analyzed in accordance with the Hoquiam Municipal Code . . . No additional cost benefit analysis was conducted . . . The proposed action[s] would result in some economic and financial benefits to the City of Hoquiam, as well as some costs" (Ecology, City of Hoquiam 2015a, 2015b, p. S-32). The cost-benefit analyses included in the Draft EISs fail to acknowledge or consider significant impacts, damages, and costs. These omissions are a concern to the Service.

Grays Harbor and its major tributaries support large and important fisheries, both fin fish and shellfish. These fisheries are important (socially, economically, and culturally) to the citizens of Grays Harbor, the State of Washington, and to the QIN and Confederated Tribes of the Chehalis Reservation. These fisheries support traditional industries that are vital to the economy of the region and the State, including fishing, crabbing, tourism, shellfish culturing, boat building, and marine support services.

The Service believes that failure to account for externalities, including social and environmental impacts and damages, results in findings that are skewed and incomplete. Decision-makers, and the general public, should not be presented with a distorted image of true costs and benefits. There is a strong emerging State and regional consensus that CBR proposals pose unacceptable risks, and that associated costs and damages may exceed the economic benefits that accrue to local communities and the State. The SEPA co-leads should broaden their consideration of social and environmental factors where possible, and should monetize and provide to the public a thorough and comprehensive accounting of all the foreseeable impacts, costs, and damages that are likely to result from the current proposals.

Response FA4-14

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment FA4-15

In Summary, the Service believes that the current Westway and Imperium proposals would have unavoidable and significant adverse impacts, and would damage both fish and wildlife and tribal trust resources. Therefore, the Service cannot and does not offer its support for the current Westway and Imperium proposals.

Thank you for the opportunity to review and offer comments for the Draft EISs. If these comments are unclear, if the SEPA co-leads have related questions, or would like to further discuss these proposals and/or the SEPA process, please contact Ryan McReynolds (WFWO, Consultation and Conservation Planning Division; Email: ryan_mcreynolds@fws.gov).

Sincerely,

Martha L. Fensen for
Eric V. Rickerson, State Supervisor
Washington Fish and Wildlife Office

cc:
City of Hoquiam, WA (B. Shay)
Ecology, Lacey, WA (D. Butorac)
Ecology, Lacey, WA (S. Toteff)
Port of Grays Harbor, Aberdeen, WA (M. Horton)
FWS, Nisqually NWRC, WA (G. Nakai)
Quinault Indian Nation, Taholah, WA (D. Bingaman)
NMFS, Lacey, WA (J. Fisher)
WDFW, Montesano, WA (A. Spoon)
WDFW, Montesano, WA (S. Kalinowski)

Sources Cited

Quinault Indian Nation (QIN). 2015 (October 2, 2015). Letter to Eric Rickerson, Manager, Washington Fish and Wildlife Office, Re: Crude-by-rail storage and transport facilities in Grays Harbor. 2pp.

Washington State Department of Ecology and the City of Hoquiam, Washington (Ecology, City of Hoquiam. 2015a. Westway Expansion Project, Draft Environmental Impact Statement, Volumes I-III. August 2015.

Washington State Department of Ecology and the City of Hoquiam, Washington (Ecology, City of Hoquiam. 2015b. Imperium Terminal Services Expansion Project, Draft Environmental Impact Statement, Volumes I-III. August 2015.

U.S. Department of the Interior. 1994 (June 28, 1994). The Native American Policy of the U.S. Fish and Wildlife Service. 9pp.

U.S. Department of the Interior and U.S. Department of Commerce. 1997 (June 5, 1997). Secretarial Order 3206. 14pp.

U.S. Environmental Protection Agency (EPA). 2011. Clean Water Act Section 404(q) Dispute Resolution Process. 2pp. (Accessed May 5, 2014). Available On-Line @ http://water.epa.gov/type/wetlands/outreach/upload/404q.pdf.

U.S. Fish and Wildlife Service (USFWS). 2014. Grays Harbor National Wildlife Refuge and Black River Unit of Nisqually National Wildlife Refuge, Draft Comprehensive Conservation Plan and Environmental Assessment, Chapter 1 (Introduction). 33pp.

Response FA4-15

Comment acknowledged.

FA5, U.S. Department of Interior, National Park Service, Pacific West Region, Palmer Jenkins

Comment FA5-1

United States Department of the Interior
NATIONAL PARK SERVICE
Pacific West Region
909 151 Avenue, Suite 500
Seattle, WA 98104

IN REPLY REFER TO:
l.A.2. (PWRO-NR)

November 5, 2015

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

To Co-Lead Agency Representatives:

The National Park Service (NPS) appreciates the opportunity to provide comments on the Draft Environmental Impact Statements (DEIS) for the Westway and Imperium Terminal Services Expansion Projects proposed in Grays Harbor, Washington. The facilities are proposing to expand operations to accommodate receipt of crude oil by train and subsequent shipment by marine vessels to refineries on the West Coast and, potentially, abroad. Given the concerns identified in our May 19, 2014, letter that provided scoping comments, our review of the DEISs focused on potential impacts on areas managed or administered by the NPS. These areas include Glacier National Park in Montana; sections of the Lewis and Clark National Historic Trail, Oregon National Historic Trail, and Ice Age Floods National Geologic trail along the Columbia River in Oregon and Washington; Fort Vancouver National Historic Site in Vancouver, Washington; Lewis and Clark National Historical Park near Astoria, Oregon; Olympic National Park in northwest Washington; San Juan Island National Historical Park on San Juan Island, Washington; and Ebey's Landing National Historical Reserve on Whidbey Island, Washington.

Based on the information provided for the DEISs, marine vessels traveling south from Grays Harbor should be 25-50 nautical miles from shore, so it is highly unlikely the projects could impact Lewis and Clark National Historical Park. However, there is still a potential for train or marine vessel traffic, or oil spills, to affect the other areas described in our scoping letter. Therefore, we were disappointed that while the DEISs include comprehensive analyses of impacts at the terminal site and the rail line from Centralia to Grays Harbor (i.e., the study area), there is minimal discussion of potential impacts associated with trains traveling from the central United States to Centralia and with marine shipping outside of Grays Harbor (i.e., the extended study area). Given that the purpose of completing an EIS under Washington's State Environmental Policy Act is to inform local and state agencies, decision-makers, and the public about potential project impacts, we recommend the final EISs provide a more robust analysis of impacts in the extended study area. The final EISs should also include a map showing areas managed or administered by the NPS, as well as other areas of natural, cultural, historical significance, that could be affected by the projects.

Response FA5-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts, described in Section 4.7, *Impacts on Resources*, would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

The maps requested for areas of natural, cultural, and historical significance are included in geographic response plans (GRPs) developed for specific areas as part of the Northwest Area Contingency Plan. The plan intent and use is discussed in Draft EIS Chapter 4.2, *Applicable Regulations.* These maps are located at www.rrt10nwac.com/GRP/Default.aspx.

Comment FA5-2

Section 6.5.1.2 discusses greenhouse gas (GHG) emissions associated with the projects. According to the DEISs, the Westway, Imperium, and Grays Harbor Rail Terminal projects cumulatively would result in a 0.11 percent increase over 2011 levels in statewide rail, marine vessel, and industrial source GHG emissions, including a 7.8 percent increase in rail emissions. Appendix 2 of

Washington's 2010 Climate Change Comprehensive Plan states "maintaining emissions at current levels means we are not on track to meet the state's statutory GHG reduction limit for 2020, and must continue to look for additional opportunities to increase energy efficiency, promote renewable energy, and otherwise reduce our GHG emissions." Requiring the Westway, Imperium, and Grays Harbor Rail Terminal projects to offset all project GHG emissions would support the goals of the state's 2010 Plan.

Response FA5-2

Refer to Chapter 3, Section 3.2.71, *Applicant Mitigation*, for proposed mitigation measures for air quality and greenhouse gas impacts.

Comment FA5-3

Sections 6.5.7 (Westway) and 6.5.8 (Imperium) discuss potential cumulative impacts from rail and marine vessel transport in the extended study area. The DEISs imply Westway and Imperium have no responsibility for impacts, including accidents or oil spills, that occur beyond the terminal site or the Centralia to Grays Harbor rail line. In fact, because the increased rail and marine traffic would be a direct result of the Westway and Imperium projects, the companies should play a major role in ensuring that all stakeholders are invited to participate in accident and spill response preparedness and planning. The NPS is concerned about potential consequences for visitor and employee safety, and adverse effects on natural, cultural, and historic resources, in parks and affiliated areas. This is of particular interest at Glacier National Park and Fort Vancouver National Historic Site because the rail line runs through both parks. We recommend the DEISs include a strategy for engaging stakeholders in response planning.

Please contact Tonnie Cumming at 360-816-6201 or Tonnie_Cummings@nps.gov for further information or if you have any questions regarding our comments.

Sincerely,

Palmer Jenkins
Deputy Regional Director, Pacific West Region

FNP:tcummings:101615: 360-816-6201:westway and imperium deis letter 10 16 2015.docx.

Response FA5-3

Draft EIS Chapter 4, Section 4.2.1, *What framework prevents incidents from happening?* describes the formalized planning framework in place to address risks related to oil spills, fires, or explosions from the terminal operations, rail transport, or vessel transport. The responsible party may vary during the transport of crude oil. This section describes the requirements for planning and preventive equipment and design. Section 4.2.2, *What framework prepares for an incident?* describes federal and state regulations to prepare for an incident, the integration of plans, and drill and exercise requirements. The Department of Interior is part of the Regional Response Team 10 responsible for developing the Northwest Area Contingency Plan.

3.2 State Agencies

The state agencies listed in Table 3-2 submitted comments on the Draft EIS. These comments and responses to those comments are presented after the table. Master responses were developed to address commonly raised comments and are presented in Chapter 2, *Comment Themes and Master Responses*.

The responses refer to the Draft EIS unless information has been revised, in which case the Final EIS is specified.

Table 3-1. Comment Letters Submitted by State Agencies

Number	Agency
SA-1	Washington State Department of Archaeology and Historic Preservation, Lance Wollwage
SA-2	Washington State Department of Health, Maryanne Guichard
SA-3	Washington Department of Fish and Wildlife, Michele Culver
SA-4	Washington State Department of Natural Resources, Megan Duffy
SA-5	Washington State Department of Transportation, Megan White
SA-6	Washington State Parks and Recreation Commission, Randy Kline
SA-7	Washington Utilities and Transportation Commission, Steve King

SA1, Washington State Department of Archaeology and Historic Preservation, Lance Wollwage

Comment SA1-1

DAHP
Protect the Past, Shape the Future
Allyson Brooks Ph.D., Director
State Historic Preservation Officer

September 3, 2015

Mr. Brian Shay
City Administrator
City of Hoquiam
609 8th Street
Hoquiam, WA 98550

Ms. Diane Butorac
Regional Planner
Southwest Regional Office
Department of Ecology

In future correspondence please refer to:

Log: 031913-07-ECY

Property: WESTWAY TERMINAL TANK FARM EXPANSION PROJECT

Re: Adverse Impact

Dear Mr. Shay and Ms. Butorac:

We have reviewed the draft Environmental Impact Statement (DEIS) prepared the City of Hoquiam and Washington State Department of Ecology for the Westway / Imperium rail terminal project(s). As detailed in the Cultural Resources Technical report attached to the DEIS, the project will impact intertidal sediments across a large part of the project area. We disagree with your consultant's assertion that these deposits have a low probability to hold significant archaeological materials.

Intertidal deposits in the project area are known to hold widespread and dense concentrations of significant archaeological artifacts and features. Moreover, WSDOT's recent trenching of graving dock sites in Grays Harbor established that intact intertidal archaeological sites exist in the area at "heavily disturbed" locations beneath deep industrial fills.

Also, WSDOT's experience in Seattle at the rescue pit for "Bertha" the Tunnel Boring Machine (TBM) demonstrates the limits of coring as an archaeological sampling tool. At the TBM site archaeologists examined a great many cores yet failed to discern a massive intertidal archaeological site, which was later uncovered during mechanical excavation of the pit. In short, cores are useful for identifying major deposits and gross stratigraphy, but do not provide a sample that reliably captures archaeological data. In this case, your cores have identified intertidal deposits with a high likelihood of holding archaeological materials, but do not speak to the actual presence of any such remains.

Knowing now that intertidal deposits exist and will be impacted by the Westway / Imperium project, the DAHP would normally request additional testing—e.g., trenching—to sample specifically for archaeological materials. However, we do recognize that reaching such sites is very difficult and may disrupt construction plans and activities. In cases like this where there is a likelihood that significant archaeological resources exist but cannot be accessed for survey, testing and recovery, the Department of Archaeology and Historic Preservation assumes the loss of such resources and requires mitigation. We look forward to the development of a Memorandum of Understanding that incorporates your proposed archaeological monitoring of excavations that reach intertidal deposits, and addresses the mitigation of cultural resources for the project.

Response SA1-1

The Draft EIS acknowledges that the shores of Grays Harbor were important habitation and resource gathering areas, with habitations and fishing facilities being the most likely to leave a robust archaeological trace. Draft EIS Appendix J, *Cultural Resources Technical Report*, reports that the potential for encountering archaeological sites is based on the depth of proposed action-related ground-disturbing activities that would result in the excavation of sediments relative to the depth of anthropogenic fill. As indicated in Appendix J, although buried intertidal sediments are present at the project site, only one of the proposed action-related ground-disturbing activities would extend below the depth of anthropogenic fill—the driving of piles—and this activity would not result in the excavation of sediments and has associated access-related limitations. The conclusion was based on subsurface information obtained at the REG (formerly Imperium Terminal Services) site via both geoarchaeological cores and mechanically excavated trenches and at the project site via geoarchaeological cores. In recognition of the limitations associated with exclusively using

geoarchaeological cores at the project site, Draft EIS Chapter 3, Section 3.11.7.1, *Applicant Mitigation*, identifies a measure for monitoring of ground-disturbing activities that extend to depths greater than 15 feet below the current ground surface by a qualified professional archaeologist. This depth was selected because it is the point at which the interface between anthropogenic fill and intertidal sediments becomes ambiguous. However, except for pile driving, which would not result in the excavation of sediments and therefore monitoring would be of little benefit, ground-disturbing activities for the proposed action are not anticipated to extend to this depth. Based on this information, Appendix J, *Cultural Resources Technical Report*, states that the proposed action has limited potential for encountering as-yet undocumented archaeological sites.

SA2, Washington State Department of Health, Maryanne Guichard

Comment SA2-1

STATE OF WASHINGTON
DEPARTMENT OF HEALTH
DIVISION OF ENVIRONMENTAL PUBLIC HEALTH
PO Box 47280
Olympia, Washington 98504-7820
(370) 236-3000 TTY Relay Service: (800) 833-6388

November 23, 2015

The City of Hoquiam
The Washington State Department of Ecology
Westway and Imperium Expansion Projects EISs
c/o ICF International
710 Second Avenue, Suite 550
Seattle, Washington 98104

Re: Comments on the Westway and Imperium Draft Environmental Impact Statements (EISs)

Thank you for the opportunity to comment on the draft Environmental Impact Statements (EISs) for the Westway and Imperium projects. As the state health department, we are interested in the impacts these projects will have on the health and well-being of people in Washington State. We recognize Grays Harbor County has one of the highest unemployment rates in the state and that the economic impacts of the projects could be beneficial in the case of increased employment at the facilities or detrimental in the case of a spill that impacted fishing and shellfish harvesting. We also recognize that the noise, traffic, air pollution, and the risks of spills or explosions would negatively impact health. We support the mitigation measures in the draft EIS that will reduce negative impacts on public health including anti-idling policies at the facilities, coordinating with communities to reduce the impacts of noise, and improving safety at rail crossings. Despite these mitigations, we have some recommendations on how to more fully address issues that impact health in the EIS:

- Air quality monitors should be sited so that it measures the highest potential exposure level, and data should be reported more frequently than annually in order to adequately respond to high exposure events.

- Impacts of noise on schools should be minimized. Education is a key determinant of health and can be adversely impacted by the noise generated by trains.
- Health impacts of spills, derailments, and explosions should be more adequately addressed in the EIS. For example, death is not considered as a potential impact of a derailment or explosion.

Response SA2-1

Refer to responses to specific comments below related to air quality monitoring and reporting (SA2-2), minimization of noise impacts on schools (SA2-3), and analysis of health impacts of spills, derailments, fires, or explosions (SA2-4).

Comment SA2-2

Air Quality

We agree that diesel particulate matter (DPM) emissions should be monitored. Diesel exhaust is a human carcinogen and is projected to be emitted during construction and routine operation at the project sites. Siting of DPM monitors was not discussed in the draft EIS. We recommend that DPM monitors be sited in locations that would capture the highest possible concentrations (accounting for meteorological conditions detailed in the draft EIS, Appendix D) and reflect maximum exposures to community members, especially sensitive individuals. In addition, annual reporting of DPM emissions does not allow for a quick response to high exposure events. We recommend a shorter time frame for reporting and reviewing of DPM emissions (e.g., monthly) in order to more quickly respond to high DPM events and adjust operations to better protect the surrounding community.

Response SA2-2

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P.

These changes result in lower diesel particulate matter emission rates and result in a lower cancer risk. The incremental increase in cancer risk from air quality impacts would be less than 10 in 1 million for any offsite receptor. This level of increased risk is not considered significant. Because this risk is lower, the need for air quality monitoring near the project site is no longer warranted; therefore, this proposed mitigation measure has been removed from Final EIS Section 3.2.7.1, *Applicant Mitigation*. Refer to the Master Response for Mitigation Framework.

Comment SA2-3

School Noise

Education is a key social determinant of health. A review article [Footnote 1: Shield, B., and Dockrell, J. (2003). The Effects of Noise on Children at School: A Review, Building Acoustics, 10(2), 97-116] on the effects of noise on children at school concluded that noise negatively impacts children's performance at school, particularly reading scores. Aberdeen, Elma, and especially Hoquiam already have below average reading scores compared to the rest of the state [Footnote 2: Office of Superintendent of Public Instruction, Washington State. Washington State Report Card]. Grays

Harbor County's high school graduation rate is 76 percent, slightly below the state average [Footnote 2: Office of Superintendent of Public Instruction, Washington State. Graduation and Dropout Statistics Annual Report, April 2015. Appendix B] of 77 percent and even further below the national average of 81 percent. The World Health Organization and the American National Standards Institute (ANSI) recommend a background average noise maximum of 35 dBA for an hour.

In Grays Harbor County alone, the cities of Hoquiam, Aberdeen, Cosmopolis, Montesano, Satsop, and Elma have schools within 1,500 feet of a railroad that would be impacted by this proposal. Using GIS and publically available data [Footnote 4: Office of Superintendent of Public Instruction Data Gateway, accessed November 2015], we found that schools across Washington that were within 1,500 feet of a railroad had 6 percent more students who did not meet standards on English Language Arts. Noise could also have unintended policy impacts on schools. To site a school in Washington State, ambient noise must have an hourly average at or below 55 dBA and not exceed a hourly maximum of 75 dBA, WAC 246-366-030. In addition to the health and performance issues noted above, we are concerned that there is a potential for the rail traffic to increase noise levels sufficiently that certain schools may not meet the noise requirements if they wanted to remodel. This would have a significant impact on the community and could disrupt a child's education. We suggest you assess the impacts of noise on education and school siting along the train route.

Response SA2-3

Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*, presents an analysis of noise impacts, including noise from trains related to the proposed action. The analysis uses the Federal Railroad Administration adopted noise assessment methods developed by the Federal Transit Administration. Per these methods, noise exposure values are reported as hourly equivalent sound level (L_{eq}) for Category 1 and 3 land uses, including schools, and day-night average sound level (L_{dn}) for residential land uses (Category 2). Daytime loudest-hour noise levels (in terms of L_{eq}) were not analyzed because the loudest hour at grade crossings and wayside locations, generally characterized by a single train passby, would be unchanged from existing conditions.

The focus of the noise analysis is on L_{dn} for locations where people sleep. Noise-sensitive land uses are identified within approximately 500 feet of the PS&P rail line for wayside noise and within 1,000 feet of grade crossings for train horn noise. No schools in the study area are within these distances.

Because freight rail traffic does not run on a schedule, the analysis assumes rail events related to the proposed action would be evenly distributed over a 24-hour day. No moderate or severe impacts on sensitive receptors were identified for train wayside noise. The analysis identifies moderate and severe noise impacts at residential receptors adjacent to grade crossings from the increase in horn noise events related to the proposed action over a 24-hour day. No moderate or severe impacts are predicted at schools.

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport in the extended study area qualitatively.

Comment SA2-4

Public Health Risks of Explosions, Spills, and Derailments

We do not believe that the health risks from potential fires, derailments, or explosion are adequately addressed. For example, in the spill scenarios, the risk to the environment is displayed on a scale from low to severe, but the risks to human health are not estimated. At the bottom of table S-3, you list potential impacts to human health from spills and explosions. The list fails to mention:

- Death
- Injury
- Mental Health
- Contaminants in Fish

Although they are rare, deaths and injuries from explosions, spills, and derailments of freight trains in the United States and North America have occurred in recent years and pose a low probability but high impact risk. There is also no mention of mental health, which would likely be the most prevalent public health impact following an explosion, spill, or derailment. Neria et a., 2008 [Footnote 5: Neria Y, Nandi A, and Galea S. Post-Traumatic Stress Disorder following disasters: A systematic review. Psychological medicine. April 2008; 38 (4):467-480] assesses post-traumatic stress disorder (PTSD) following technological disasters. In 65 studies of 40 technological disasters, they found that the prevalence of PTSD was between 15-75 percent in the first month after the disaster. This rate often dropped off sharply in the year following the event; however, in some instances rates stayed high for as long as a decade.

There is a wide range of chemicals of concern for human health that could be released by a spill and exist or accumulate in fish and shellfish in Grays Harbor. Despite efforts to control the consumption of contaminated fish after a spill, it is likely that some individuals would continue to fish, harvest, and consume fish and shellfish from Grays Harbor and increase their exposure to toxic substances. Although it would be difficult to forecast health impacts without knowing what was spilled, how much, or where, there is potential for harm to human health.

Response SA2-4

The approach to the risk analysis involves assessing the chance of various release scenarios related to terminal (onsite) operations and rail and vessel transport to and from the project site, rather than predicting when and where a spill would be most likely to occur. Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts on resources. The Final EIS section has been revised to more fully describe human health impacts that could occur as a result of an oil spill, fire, or explosion, including consumption of contaminated material. For more information on the risk analysis approach, refer to the Master Response for Environmental Health and Safety Analysis.

Comment SA2-5

We recommend that the impacts to schools along the Puget Sound and Pacific Railroad and other impacted railroad lines in Washington be assessed and attempts made to mitigate those impacts through noise reduction strategies.

Response SA2-5

Refer to Response to Comment SA2-3.

Comment SA2-6

We further recommend that air quality monitors be sited to measure maximum potential exposure levels and that monitoring data be reported more frequently than annually.

Response SA2-6

Refer to Response to Comment SA2-2.

Comment SA2-7

In regards to public health impacts of derailments, spills, and explosions, we recommend that the scope of the health impacts be reassessed along with potential mitigation measures.

If you have questions about these comments or need technical assistance from the state health department during the Environmental Impact scoping process, please contact Rad Cunningham at (370) 236-3359 or by email at Rad.Cunningham@doh.wa.gov.

Sincerely,

Maryanne Guichard
Assistant Secretary

Response SA2-7

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to describe potential human health impacts that could occur as the result of an oil spill, fire, or explosion. The framework for preventing and responding to an oil spill, fire or explosion is discussed in Section 4.2, *Applicable Regulations*; additional mitigation measures to reduce the potential for impacts are proposed in Sections 4.4.3, 4.5.3, and 4.6.3. These measures, which are aimed at minimizing the frequency and extent of a potential spill, could reduce the potential for adverse impacts on human health. However, no mitigation measures would completely eliminate the possibility of a spill, fire, or explosion, nor would they completely eliminate the adverse consequences of a spill, fire, or explosion. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

SA3, Washington Department of Fish and Wildlife, Michele Culver

Comment SA3-1

State of Washington
Department of Fish and Wildlife
Mailing Address:
48 Devonshire Rd

Montesano, WA 98563
(360) 249-4628
TTY (800) 833-6388

November 20, 2015

Imperium and Westway DEIS c/o ICF International
710 Second Avenue, Suite 550
Seattle, Washington 98104

RE: Imperium and Westway Draft Environmental Impact Statement Comments

The Washington Department of Fish and Wildlife (WDFW) is mandated to preserve, protect, and perpetuate the fish and wildlife resources and their habitats on behalf of the state's citizens, and is responsible for maintaining the economic well-being of the fishing industry and promoting outdoor recreation. In light of our responsibilities, we submit the following comments on the scope of the environmental reviews for the Imperium and Westway proposals.

While WDFW is concerned about the broader ecosystem effects associated with all of the areas identified for discussion in the Environmental Impact Statement (EIS), we are focusing these comments on the potential threats to fish, wildlife, their habitats, and in some cases, the commercial and recreational fisheries and coastal communities dependent upon the health of those resources, resulting from these proposals.

WDFW understands that these are separate proposals, which will have separate EIS documents; however, as the proposals have common elements, such as the addition of bulk liquid storage tanks for crude oil (and, in the Imperium Renewables proposal, for other hazardous materials), expansion of rail facilities, and new pipelines, our comments are relevant to both proposals. The project area of potential effect should be analyzed at three scales: the project site, the project vicinity, and the broader project shipping prism. In addition, impacts to natural resources from the increase in rail transportation associated with the delivery of crude oil to the distribution terminal also must be addressed. The proposed projects will significantly increase the amount of oil transiting Grays Harbor and the surrounding areas by trains (1,188 new train movements per year), pipelines, vessels/barges (428 new vessel/barge movements per year).

Response SA3-1

Draft EIS Chapter 3, Section 3.0.4, *What areas and activities were analyzed?* provides a description of the areas and activities analyzed in Chapter 3, *Affected Environment, Impacts, and Mitigation*, which includes consideration of the project site and surrounding vicinity and rail and vessel transportation corridors. The impacts on natural resources associated with the risk of crude oil spills, fires, and explosions are addressed in Chapter 4, Section 4.7, *Impacts on Resources*. Final EIS Section 4.7 more fully describes some of the potential impacts.

Comment SA3-2

While WDFW recognizes that there are existing storage tanks, pipelines, and rail facilities bordering the Harbor now that pose potential threats to marine life, we are concerned about the greater risks associated with the dramatic expansion of this infrastructure, the increase in the amount of product

being handled, and the additional rail activity that will occur in the area bordering the estuary and throughout the western Washington region.

Response SA3-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents an analysis of potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil) under the proposed action. Chapter 4 focuses on determining the likelihood and possible release volumes associated with a representative set of potential release scenarios related to the proposed action to provide decision-makers and planners with an understanding of the types of risks of concerns and to help identify targeted mitigation measures. Refer to Master Response for Environmental Health and Safety Analysis. For additional information about the analysis of impacts in the extended study area, refer to the Master Response for the Geographic Scope of the EIS.

Comment SA3-3

Scope of Impacts

The study area has been limited to the mouth of Grays Harbor. Given that outgoing oil laden vessel traffic will move north and south along Washington coastline, an obvious risk is still present beyond the mouth of the harbor and should be addressed by these DEISs. Northwest Area Contingency Plan (NWACP) Geographic Response Plans (GRP) including; Outer Washington coastline, Straits of Juan de Fuca, San Juan Islands, Admiralty Inlet, North Central, Central, and North Puget Sound can be utilized for additional information on these areas.

Response SA3-3

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from vessel transport—less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*. Final EIS Chapter 5 reflects additional information characterizing potential risks related to vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Comment SA3-4

Although the analysis of potential risk of oil spills is estimated to increase by an order of magnitude the total risk is still characterized as low. The confidence limits around this point estimates are not reported, but presumably will range above and below the reported value. Experience has shown that the complete recovery of the environment from major oil spills takes on the order of decades. For example 26 years after the Exxon Valdez oil spill several impacted resources have not completely recovered to pre-spill levels.

Response SA3-4

Many uncertainties contribute to both the actual risks and the analysis of those risks, particularly, as noted in the comment, related to quantitative risk assessments. However, as discussed in Master

Response for Environmental Health and Safety Analysis, the Draft EIS relies on a semi-quantitative scenario-based approach and does not include a quantitative or probabilistic risk assessment. Therefore, the risk assessment methods do not consider confidence intervals to account for the inherent uncertainties in predicting risk. Rather, the Draft EIS provides context for understanding how best to interpret and apply the results of the study. More specifically, Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*, explain that the results of the risk assessment are more meaningful when compared to each other, as opposed to considering them as predicting absolute frequencies of potential impacts. Section 4.7, *Impacts on Resources*, describes the general types of impacts on resources that would be expected as a result of an oil spill; the section has been revised to acknowledge the potential for more lasting impacts as the result of a spill.

Comment SA3-5

Although the DEISs are developed separately for the Westway and Imperium projects, the cumulative increase of the projects should be considered.

Response SA3-5

Draft EIS Chapter 6, *Cumulative Impacts*, addresses the potential impacts of the proposed action when considered in combination with all other past, present, and reasonably foreseeable future projects. The REG (formerly Imperium Terminal Services) Expansion Project and Grays Harbor Rail Terminal Project are considered reasonably foreseeable projects and are analyzed in Chapter 6.

Comment SA3-6

The DEISs may give an overly optimistic view of how well spill containment and cleanup measures can protect the potentially impacted environments. The GRPs developed in the NWACP are very helpful for protecting certain sensitive areas or serving as collection points for spilled product. The development of the GRPs is a huge advance in preparing for spills and will allow for faster and more organized response. None-the-less current spill response technology has limitations for current speed and other factors that make complete protection of the vast majority of sensitive resource from impact by a large oil spill unlikely.

Response SA3-6

Draft EIS Chapter 4, *Environmental Health and Safety*, Sections 4.4, 4.5, and 4.6, describe the geographic response plans applicable to the study area. As further noted in these sections, no measures can completely eliminate the possibility of a spill, fire, or explosion or completely eliminate the adverse consequences of a spill, fire, or explosion. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment SA3-7

Most of the GRPs involve protective booming near the entrance to small inlets, creeks or rivers where particularly sensitive resources occur. Much of the open water and extensive intertidal mud flat areas cannot be simply boomed off. To illustrate the risks consider a large release from a ship

collision near the mouth of the harbor. A spill of this type could not be entirely contained around the ship due to the high current velocities in the area. Depending on conditions, a spill in this area would either be drawn out the mouth of the bay and then move north or south along the coast, or be driven farther into the bay where large areas of sensitive resources cannot be fully protected by booms or other available spill response technology.

Response SA3-7

Draft EIS Appendix N, *Oil Spill Modeling*, illustrates the potential movement of oil within Grays Harbor for a subset of the scenarios addressed in the risk assessment. As noted in the comment and shown by the modeling, depending on the specific conditions of the incident, it is possible for oil to reach the shoreline or to move farther up or down the coast. The purpose of this information is to inform decision-makers and planners about the types of risks of concern and to help identify targeted mitigation measures. The geographic response plans and Northwest Area Contingency Plan identify strategies other than booming (e.g., use of culvert blocks and underflow dams) to combat the spread of spilled oil in Grays Harbor. Final EIS Chapter 4, Section 4.6.3, *What mitigation measures would reduce impacts related to vessel transport?* proposes additional measures that would address potential impacts related to vessel transport. However, as noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment SA3-8

Alternative spill response technologies that are used for the treatment of oil in open water such as dispersants and in situ burning would also be problematic for oil spill operations within Grays Harbor. The use of dispersants would not be advised because of the shallow nature of the bay providing only limited volume to reduce the toxic concentrations of dispersed oil. Similarly in situ burning could be limited by the proximity of human populations that could be subjected to the reduced air quality from the smoke produced by these operations. Consequently, large tracts of sensitive intertidal habitats such as, eelgrass beds, mud flats, and marshes would likely be contaminated despite the full activation of all GRPs and other spill response measures. The limits of spill response technology are acknowledged in the DEISs which state that "no mitigation measures would completely eliminate the adverse consequence of an incident."

Response SA3-8

Draft EIS Chapter 4, Section 4.2.2.2, *Northwest Area Contingency Plan*, describes the planning framework in place for Washington State and discusses the factors considered when planning and implementing a response effort. The Regional Response Team is responsible for the Northwest Area Contingency Plan development that includes the consideration of dispersants or *in situ* burning.

Comment SA3-9

Based on the DEISs, the risk of a spill may be underestimated. On Page 4.6-4 of the Westway and Imperium DEISs it states "Because of the increased number of vessel trips to and from the project site, the proposed action would result in the potential for more frequent spills of bulk liquids relative to the no-action alternative, although the orders of magnitude are very similar.

Response SA3-9

Final EIS Chapter 4, Section 4.6.2.1, *Oil Spills*, has been revised to delete the statement that the orders of magnitude are similar.

Comment SA3-10

The likelihood of very large releases would remain low." "Low" is a subjective term. The more pertinent factor is that there is an order of magnitude (ten times) of increase in risk, and for some other spill scenarios, the risks is increased by almost 40 times.

By presenting the results of the risk analysis for the terminal for the rail transport and vessel transport of petroleum products separately the total risk is obscured. As oil will generally arrive by rail, be stored and handled at the terminal and transported away with vessel. The risk of a rail incident, terminal incident and vessel incident all make a contribution to the total risk of a spill from development of these projects. The total risks, including associated increased vessel and rail traffic, should be addressed by the EISs.

Response SA3-10

Final EIS Chapter 4, *Environmental Health and Safety,* has been revised to combine risks associated with the proposed terminal (onsite) operations and rail and vessel transport. Because the mechanisms for an incident associated with terminal operations and rail and vessel transport are physically separated, associated with different responsible parties, and have different response and mitigation strategies, risks across these operations are not combined in the Draft EIS. Although there would be an increase in risks when considering the combination of risks associated with terminal, rail, and vessel operations, the circumstances contributing to each risk scenario are unique and directly relate to the potential consequences of the incident.

Comment SA3-11

The estimated risk of the various spill scenarios considered in the DEISs may be overly conservative. Considering that the Nestucca Spill of 231,000 gallons (5,500 barrels) of heavy fuel oil resulting from a collision occurred less than 30 years ago, it seems terribly optimistic that that the risk of a vessel collision resulting in a spill of up to 105,000 gallons (2,500 barrels) is only 1/2,100 years.

One possible source of conservatism of the estimates is the use of Table 14 (Appendix M); failure Rates from Glosten and Associates 2014 [*footnote 1: Glosten Associates. 2014. Gateway Pacific Terminal (GPT), Vessel Traffic and Risk Assessment Study, November 4*.]. These values use Cherry Point area data. Oil tankers transiting to or from Cherry Point have the benefit of navigational advisories from the Cooperative Vessel Traffic System and the use of escort tugs for much of the journey.

Presumably this lowers the risk of a spill for these vessels. The vessels entering or departing Grays Harbor do not currently have these safety measures available and it is unclear if they would be required for vessels serving the Imperium Renewables or Westway facilities. The current method may then underestimate the risk of oil spills from vessel operation.

Response SA3-11

As noted in Draft EIS Appendix N, *Oil Spill Modeling,* the release scenarios include spill volumes up to the amount specified, meaning that the chances of any release scenario occurring includes the possibility of a smaller-sized spill from the specified event. Incidents occurring during vessel transit are skewed to the larger, less likely spill sizes because the magnitude of the incident must be sufficiently great so that the forces involved penetrate the hull of the vessel. In those cases, the releases sizes are more likely to be relatively larger and less likely given the loss of integrity of at least one compartment. Final EIS Chapter 4, Section 4.4.2.1, *Oil Spills,* has been revised to note that the risk of a small to medium oil spill (up to 2,100 gallons [50 barrels]) would be more likely to occur during vessel loading and could happen approximately 4.7 times between 2017 and 2037. Final EIS Chapter 4, Section 4.6.2.1, *Oil Spills,* has been revised to show the chance of any spill during vessel transport is 25% over the same period. Refer the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment SA3-12

Additionally, the risk analysis does not include the risk of contributing disasters such as severe storm, earthquakes and/or tsunamis. For example, recent reports (Schulz, 2015) [*footnote 2: Schulz, K. July 20, 2014. The Really Big One; An earthquake will destroy a sizable portion of the coastal Northwest. The question is when. The New Yorker*.] indicate that the Cascadia Subduction zone is overdue for a major (9.0 Richter scale) earthquake with an estimated one-third chance of it occurring in the next 50 years. Obviously the earthquake could do damage to the facility and rail lines, but the ensuing tsunami could severely damage a ship moored to the facility, the facility itself, train tracks, and rail cars in the vicinity. Any, or all, of which could cause a large oil spill.

Response SA3-12

As noted in Draft EIS Appendix M, *Risk Assessment Technical Report,* Section 3.2, *Approach and Data*, the risk assessment evaluates the likelihood that different spill scenarios could occur regardless of the cause. The selected sources consider applicable causes of failure, including construction defects, natural hazards, human error, and material failures. The likelihood of a tsunami occurring within the study area is addressed more specifically in Draft EIS Chapter 3, Section 3.1, *Earth*.

Considering that the intent of the risk assessment is to inform decision-makers and planners, as opposed to final technical designs, these sources and the approach to the risk assessment are considered appropriate for the Draft EIS. Refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment SA3-13

An additional matter concerning these risk estimates is a possible mistake on page 4.4-5 of the Imperium Renewables DEISs. It is reported that the risk of a medium pipeline or storage tank spill scenario drops from 1/714 years for the no action alternative to 1/ 1,100 with the project in place.

Similarly, a large spill from storage tank failure scenario is reported as decreasing from 1/14,000 years for the no action alternative to 1/22,000 with implementation of the project.

Response SA3-13

The comment is specific to the Imperium Terminal Services Expansion Project Draft EIS. Comments on that proposal would be addressed in in response to comments as part of the Final EIS for that project. With respect to Westway, the risks of the proposed action are slightly greater than those under the no-action as shown in Chapter 4, Section 4.4.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to terminal operations at the project site?* The increase in risk between the no-action alternative and the proposed action is not greater because the increase in risk was calculated for the incremental increase in storage tanks. The risk associated with the no-action alternative is for four existing tanks and the risk associated with the proposed action would be for the five additional tanks only.

Comment SA3-14

For the Westway DEIS, it is unclear why the risk of a small rail transport spill decreases from 1/85 years with the no action alternative to 1/100 after the project is implemented.

Response SA3-14

Under the no-action alternative, the risks were assessed for Westway's receipt of methanol on manifest freight trains. As noted in Chapter 2, *Proposed Action and Alternatives*, Westway currently receives methanol by train. This process typically results in one to two trips onto and off the project site each day, to deliver and remove an average of 10 rail cars. Under the proposed action, the risks were assessed related to the movement of crude oil unit trains. Although the number of rail cars carrying crude oil per train (120) are greater than the number of rail cars carrying methanol per train (10), the number of trains under the no-action alternative (an average of 3 trips per day) is greater than the number of trains associated with the proposed action (an average of 1.25 trips per day). Considering all the factors evaluated in the risk assessment, the likelihood of a small to moderate release associated with existing conditions is slightly greater than the incremental increase in risk associated with the proposed action. For these reasons, the largest release scenario is not applicable to the existing conditions.

Comment SA3-15

Put another way, even if we acknowledge that catastrophic spills happen very rarely, as stated in the proposal, it should be expected that some oil will certainly be released into the environment as a result of these projects. If we accept the calculations (Appendix M, Fig 2) we can see that a release of 2100 gallons could be expected to occur at the Westway/Imperium loading dock - to water, and thus outside of containment; approximately every 2.6 years. Although this would be considered a minor incident according to the DEIS, it should be noted this volume of oil to water has the potential to cause significant negative effects within Grays Harbor. In addition, this same table suggests that an additional release of ~10,000 gallons would be expected to occur each ~43 years - a volume of oil that could certainly cause significant long-term impacts to the area. Cumulatively, then, this modeling exercise is suggesting that a volume of ~45,000 gallons of oil will be spilled to water by these facilities each ~43 years for a yearly average of ~1,000 gallons/year.

Response SA3-15

As noted in the response to Comment SA3-11, the release scenarios include spill volumes up to the amount specified, meaning that the chances of any release scenario occurring includes the possibility of a smaller-sized spill from the specified event. Nonetheless, Draft EIS Chapter 4, *Environmental Health and Safety,* acknowledges that the risks associated with the proposed action cannot be completely eliminated and that depending on the specific circumstances of the incident, there is a potential for significant environmental impacts.. As noted in Chapter 6, *Cumulative Impacts,* each facility operates independently. The chance of an incident involving the release of up to 10,000 gallons (238 barrels) during vessel loading would increase to once every 43 years under the cumulative scenario.

Comment SA3-16

The applicant's model indicates that a spill of ~30,000 gallons would be expected to occur along the PS&P rail line every ~10 years and it is likely that significant environmental impacts would occur from such a spill. Given the number of stream crossings and wetlands present along this line, it is also likely that a spill of this size would spread to the Chehalis River and potentially Grays Harbor.

Response SA3-16

As described in Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*, the medium rail transport spill scenario (referred to in the Final EIS as the one rail car spill scenario) resulting in a spill of up to 30,000 gallons—could occur once in 36 years with current rail cars; with rail car improvements, this would extend to once in 43 years. Along the PS&P rail line in the study area, a spill could affect a sensitive area or habitat of concern. Table 4.5-1 lists sensitive habitat areas and identifies the approximate length of exposure and its relative portion of the total route along the PS&P rail line. This percentage can be applied to the estimated chances of a release to determine the possibility that a specific release might occur in a particular area. Resources, including waterways that could be affected, are described in Section 4.7, *Impacts on Resources*.

Comment SA3-17

The applicant's calculations (Table 15) indicates that they would expect a spill of ~105,000 gallons of crude oil to occur due to a vessel collision within Grays Harbor each ~45 years. It should be noted, however, that this volume appears to be based on oil spilled from the tanker not the other vessel involved and it seems likely that there could also be a fuel release from the second vessel as well. In addition, given that a release risk of 1:5 is presumed (i.e. crude is released only once in each five collisions) for the tank vessels (Table 13), and the size of these vessels, it would seem likely that petroleum releases from the second vessels in these collisions (likely to be single-hulled cargo or fishing vessels) would occur at a more frequent rate than indicated in the table for crude. WDFW staff is not expert in this type of spill risk analysis, but given the concerns expressed above it would be prudent to have an independent third party with expertise in these matters review the risk analysis presented in these DEISs.

Response SA3-17

The risk assessment presented in Draft EIS Appendix M, *Risk Assessment Technical Report,* was completed by a third-party contractor with direction from the co-lead agencies to provide

information to evaluate the proposed action consistent with the requirements of SEPA. The release scenarios evaluated in Appendix M and modeled in Appendix N, *Oil Spill Modeling,* were developed in coordination with the co-lead agencies and are consistent with applicable regulatory requirements. Refer to the Master Response for Environmental Health and Safety Analysis.

Comment SA3-18

Potential Impacts to the Marine Environments

WDFW has serious concerns about the potential impacts to marine life, which could occur during the transport of crude oil or other hazardous products via rail, shipping vessel, or pipeline, or at the bulk liquid storage facility adjacent to Grays Harbor.

The Westway Expansion Project would involve the construction of five new storage tanks on the site to the south of Westway's existing bulk storage tanks. The new tanks would each have a total storage capacity of 200,000 barrels (8.4 million gallons) for a project total storage capacity of 1 million barrels (42 million gallons). The annual maximum throughput would be 17.8 million barrels (749.9 million gallons) per year. Up to nine storage tanks would be constructed on the site to the north/northwest of Imperium's existing bulk storage tanks. The new tanks would each have a capacity of 80,000 barrels (3.36 million gallons) for a project total storage capacity of up to 720,000 barrels (30.2 million gallons). The annual maximum throughput for the entire Imperium facility, including the expansion, would be 30 million barrels (l.26 billion gallons) per year.

The proposed increase in storage and associated systems for this project will significantly increase the risk of an accidental oil release. In addition, the increased volume of storage being proposed is likely to also increase the potential impact associated with any given release. Oil storage facilities can fail for a variety of reasons, including industrial accidents, unusual weather conditions such as severe storms and flooding, and other natural disasters such as earthquakes and tsunamis-all of which pose a high risk.

Grays Harbor is an area particularly sensitive to the adverse effects of oil spills. Salt marshes and sheltered tidal flats are found throughout the harbor and are vital to salmon, birds, and marine mammals. Grays Harbor is also an area vital to migrating shorebirds, supporting upwards of one million birds during their spring migration.

Response SA3-18

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including salt marshes and tidal flats and the associated species.

Comment SA3-19

If there were to be a spill, the volume of the product being considered for this project would likely lead to a catastrophic loss of habitat, and the potentially affected area could be much larger than just the Grays Harbor vicinity. Depending on the location and timing of the incident, the area affected by an oil spill could extend throughout the Grays Harbor estuary, its tributaries, and to offshore waters where the spill could reach a broad expanse the Washington coast and beyond. As an illustration of this, the Nestucca Barge incident (1998) released ~213,000 gallons of oil near the entrance of Grays Harbor. While the majority of the oil washed ashore near Ocean Shores, beaches as far away as Oregon and Vancouver Island, British Columbia were impacted. The habitats within Grays Harbor and the nearshore areas are particularly sensitive to oil spill impacts, notoriously difficult to clean of oil, and are likely to suffer years of degraded function following a spill event.

Such an incident would cause irreparable harm to the marine fish, shellfish, wildlife, and greater ecosystem for decades. The estuary is important nursery and foraging area for juvenile salmonids including stocks of coastal cutthroat trout; winter and summer steelhead; fall, spring, and summer Chinook; fall chum and coho salmon. Herring spawning areas occur in eelgrass beds at several locations within the estuary, and Grays Harbor is also nursery ground for sixgill and sevengill sharks.

Response SA3-19

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment SA3-20

The DEISs include estimates for the probability of occurrence of a wide range of different spill types and sizes. Some smaller spills could occur every five years and when the Imperium Renewables and Westway projects are both implemented small spills could be even more frequent. The cumulative effect of even smaller but presumably more frequent spills needs to be incorporated. Recent work by Incardona et al [Footnote 3: Incardona, J.P., Carls, M.G., Holland, L., Linbo, T.L., Baldwin, D.H., Myers, M.S., Peck, K.A., Tagal, M., Rice, S.D., and Scholz, N.L. 2015. Very low embryonic crude oil exposures cause lasting cardiac defects in herring and salmon. Scientific Reports, 5:13499.] indicates that very low levels of hydrocarbon pollution have impacts on the cardiac development of juvenile salmonids and herring which may have led to population level survival impacts on herring and pink salmon following the Exxon Valdez oil spill. Frequent small spills in Grays Harbor and the Chehalis River system could present a hazard to spawning hearing and salmonids utilizing the habitat.

Response SA3-20

Final EIS Chapter 4, *Environmental Health and Safety*; Chapter 6, *Cumulative Impacts*; and Appendix M, *Risk Assessment Technical Report*, have been revised to clarify that each release scenario includes a volume up to the specified amount. For example, as noted in Draft EIS Chapter 4, Section 4.4, *Environmental Health Risks—Terminal (Onsite)*, a small spill during vessel loading could occur once every 8 years under the proposed action. This scenario addresses the release of up to 2,100 gallons, which also includes the potential for smaller releases. Final EIS Chapter 6 has been revised to clarify that, under cumulative conditions, a release of up to 2,100 gallons could occur every 3 years, which also includes the potential for smaller releases. As noted, the potential for environmental impacts would depend on the specific circumstances of the event. Draft EIS Chapter 4, Section 4.7.1.2, *Plants*, addresses potential impacts of oil on plants, including sensitive areas and habitats. Section 4.7.1.3. *Animals*, identifies potential impacts on animals, including impacts from oil on the water surface, in the water column, and along shorelines and other sensitive habitats. Final EIS Section 4.7 reflects additional information about the potential impacts on resources, including plants, fish and shellfish.

Comment SA3-21

The nearshore Pacific Ocean waters are designated as critical habitat for species listed under the Endangered Species Act (ESA), such as the leatherback sea turtle, green sturgeon, and Eulachon, and as Essential Fish Habitat for West Coast salmon (including ESA listed stocks), groundfish, forage fish, and coastal pelagic sharks. The adjacent nearshore waters are important areas for thresher sharks and juvenile and adult rockfish, including species that are under rebuilding plans, such as canary and yelloweye rockfish; these species are long-lived and slow-growing with low productivity and their populations take decades to recover to healthy levels.

With regard to shellfish, the estuary is a major nursery area for juvenile Dungeness crab, which contributes significantly to the adult population along the outer coast. Portions of the estuary are under active commercial oyster culture. While much of tidelands and oysters are privately owned, commercial oyster beds provide much the same habitat benefits to native fish and shellfish as do natural beds. Eastern soft-shell clams, horse clams, Manila clams and cockles are found at various locations throughout the estuary.

Response SA3-21

Draft EIS Chapter 3, Section 3.5.4.3, *Grays Harbor*, describes the aquatic species and habitats in Grays Harbor and Pacific nearshore areas listed in the first paragraph of the comment except thresher shark and critical habitat for the green sturgeon and leatherback sea turtle. Final EIS Section 3.5.4.3 reflects the inclusion of critical habitat for the green sturgeon and leatherback sea turtle. The EIS does not address thresher shark because it is not a special-status species and does not have essential fish habitat in the study area.

Section 3.5.4.3 also addresses juvenile Dungeness crab and its highly productive habitat, oysters and clams and their farming, and other invertebrates.

Comment SA3-22

Relative to wildlife, a wide variety of birds and marine mammals also frequent the Grays Harbor area, its tributaries, nearshore ecosystems, and offshore waters. Grays Harbor is an important

foraging and resting area for migratory shorebirds and waterfowl. Waterfowl concentrations occur from fall through spring, especially in North Bay. Grays Harbor is a shorebird site of global significance, supporting up to one million birds during the spring migration, as well as large numbers of fall-migrating and wintering shorebirds. Red Knots are shorebirds that overwinter in Mexico and breed in the Arctic; Willapa Bay and Grays Harbor constitute two of only three estuaries used by the Pacific Flyway subspecies between wintering and breeding grounds. The Oyhut/Damon Point area is one of only three nesting areas in Washington for the federally threatened Snowy plover. Bald eagles and great blue herons nest throughout the region and forage in the Bay, and Peregrine falcons breed in Grays Harbor and occur in all seasons.

Response SA3-22

The Draft EIS provides information on the importance of Grays Harbor for migrating birds. Chapter 3, Section 3.5, *Animals,* describes the terrestrial and aquatic bird environments in the Grays Harbor study area and mentions a number of birds that use habitats in the study area, including the red knot, bald eagle, peregrine falcon, snowy plover, and great blue heron. A list of all federal and state-listed birds in the study area is found in Appendix F, *Special-Status Species*, which was based on the most recent listings by the U.S. Fish and Wildlife Service under the federal Endangered Species Act and Washington Department of Fish and Wildlife under the Washington State Priority Habitats and Species Program. The Draft EIS acknowledges the importance of Grays Harbor for birds as a stopover and staging area during bird migration along the Pacific Flyway (Section 3.5) and discusses the Grays Harbor National Wildlife Refuge (multiple locations in Section 3.5) and Grays Harbor's status as a hemispheric reserve of international significance as designated by the Western Hemisphere Shorebird Reserve Network (Section 3.5). In addition, the Draft EIS mentions mudflats and sand islands, describes the five Washington State Department of Natural Resources Marine Protected Areas in Grays Harbor, and includes typical bird species that may use these protected areas (Section 3.5). The Draft EIS describes the Chehalis River Surge Plain Natural Area and includes a list of several bird species that use the preserve (Section 3.5). Further, the six Audubon Society-designated Important Bird Areas of Grays Harbor have been added to Final EIS Section 3.5 to note their significance in addition to the other important areas of Grays Harbor that are listed and described above and in the Draft EIS.

Comment SA3-23

The DEISs do not identify the high importance and sensitivity of the Grays Harbor area during the spring shorebird migration. It is significant and commendable that the applicant has proposed ceasing all vessel loadings for a two-week period around the Grays Harbor Shorebird Festival (Item 3.5, pg.S-39). This would help but it does not reduce all the risk.

First, this time period represents only a small portion of the time during which this vulnerable species is traveling through this area - and that it is not entirely predictable. The annual spring shorebird migration through Grays Harbor occurs throughout the months of April and May each year and their associated fall migration takes place during the months of July through October. Although the dates for the Shore Bird Festival are static, the actual peak in the movement of shorebirds through Grays Harbor is subject to natural variation that is not always predictable. In some years, the closure may not coincide with the peak in bird abundance.

Second, this proposed mitigation implies that shorebirds are the only birds at risk during migrations. In a manner similar to the shorebirds, very large waterfowl migrations also seasonally

move through this area - with spring migrations occurring in the months of March and April and the fall migration occurring between September and November. Significant overwintering waterfowl concentrations occur November and April.

Third, the applicant seems to be implying that these wildlife species are only at risk from the direct impact of a spill. The biological purpose of these species stopping within Grays Harbor during their migration is their desperate need to feed. Some of these migratory species have traveled extremely long distance and lost a high percentage of their body weight when they stop at Grays Harbor. They rely on the harbors abundant forage to build up their reserves of energy for the continuation of north or southward migration. This means that even a spill a couple of months before the migration peak could harm the birds if it negatively impacted the infauna of invertebrates that serve as the shorebirds food. Without the ability to obtain enough caloric energy to continue the migration, birds might die or be delayed in arrival on their nesting grounds with negative impacts on reproductive success. Oil spills that might occur outside of the proposed two week period is still likely to result in very high mortality rates to these migration species by way of negatively impacting the habitat and prey species upon which they depend.

Finally, the potential impact to migratory birds described in these DEISs has been apparently limited to only large spills related to vessel loading. It should be noted that due to the biological concentrations of these species, these risks could potentially apply to any of the described spill scenarios (small, medium, or large) in this document. We would recommend that additional measures to prevent spills during late winter and early spring that could have an impact on bird migrations through Grays Harbor be considered.

Response SA3-23

Draft EIS Chapter 3, Section 3.5, *Animals*, identifies the high importance and sensitivity of the Grays Harbor area during the spring bird migration. Additionally, Chapter 4, Section 4.7.1.3, *Animals*, acknowledges that the Grays Harbor estuary is located along the Pacific Flyway, a migratory flight corridor between Alaska and South America. It is one of four major staging areas for migrating shorebirds in North America, with shorebirds congregating in the mudflats to feed and rest during spring and fall migrations. Approximately 24 species of shorebirds use the Grays Harbor National Wildlife Refuge during migrations, which begin in late April and continue through mid-May.

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS reflects revisions to clarify that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification. Potential impacts on resources in the event of a spill, fire, or explosion are addressed in Chapter 4, Section 4.7 *Impacts on Resources*. Final EIS Section 4.7 has been revised to indicate that the mechanisms for potential adverse impacts also include secondary impacts on shorebirds from loss of food sources. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Comment SA3-24

The DEISs note that the increased vessel traffic would increase the chance of vessels striking marine mammals in the navigation channel but does not indicate what measures, if any, might be taken to mitigate this. It states that the greatest potential for vessel strikes would be in the shipping lanes, which are located outside of state waters because large mammals, such as whales, typically migrate and forage in deeper waters and are not likely to enter the harbor. However, some species of whales, such as gray whales migrate along the coast and past the mouth of Grays Harbor twice a year. Gray Whales feed relatively close to shore. The Harbor is home to thousands of harbor seals and California Sea Lions from mid-spring through early fall, and is one of the largest seal pupping areas in the state. Pupping occurs throughout the bay with concentrations around Sand Island and in North Bay. Impacts in the shipping lanes outside of state waters are still impacts with a direct nexus to these projects.

Response SA3-24

Final EIS Chapter 3, Section 3.5, *Animals*, reflects additional information on gray whales, humpback whales, and killer whales and clarifies whale use of Grays Harbor, including frequent use by the gray whale. Potential impacts of vessel collisions with all marine mammals, including whales, are analyzed in Draft EIS Chapter 3, Section 3.5, *Animals,* in all parts of the study area, including Grays Harbor. Even though the occurrence of many of the whale species listed in Section 3.5 would be rare in the study area, the impacts from vessel strikes apply to all such whale species. Whales and other marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a higher risk from vessel strikes. Final EIS Section 3.5.5.2, *Proposed Action*, *Operations*, has been revised to reflect the higher risk for these species. The National Oceanic and Atmospheric Administration's (NOAA) National Marine Fisheries Service's 2014 Pacific Marine Mammal Stock Assessment indicates that the number of reported marine mammal collisions with vessels makes up a very small percentage of the populations of many marine mammals along the West Coast.[1] For example, the gray whale population is estimated to be around 20,125 whales and the reported number of vessel strikes over a 5-year period was 9.8 whales (or two whales per year). Based on this information, the annual number of gray whales that collide with a vessel along the Pacific Coast is approximately 0.009% of the gray whale population. Looking at the same numbers for the humpback whale, the annual number of humpback whale collisions with vessels along the Pacific Coast is approximately 0.059% of the entire population. This information suggests that the risk of vessel collisions on these whale populations from the incremental increase in vessel traffic is very low and any impact on populations would not be significant.

Comment SA3-25

Sea otters are not mentioned at all in the main body of either DEISs and are simply listed in Appendix F. Sea Otters are fairly rare in the immediate vicinity of Grays Harbor but there is a recovering population living on north of Point Grenville, with a significant proportion of this population is found around Destruction Island. It is possible that a large spill in the Grays Harbor area could be transported by wind and currents to the north coast area where sea otters would be impacted. Sea otters are particularly susceptible to oil injury due to their reliance on dense fur and

[1] Carretta, J. V. and 15 others. 2015. *U.S. Pacific Marine Mammal Stock Assessments: 2014.* National Oceanic and Atmospheric Administration Technical Memorandum NMFS. Doi:10.7289/V5/TM-SWFSC-549.

not blubber for thermal protection; once the pelt of sea otters is oiled, it loses most of its thermally protective qualities and the animal would likely succumb to hypothermia.

This potential threat to sea otters should be further evaluated in the DEISs perhaps by hypothetical trajectory modeling to see the risk of the various spill scenarios considered to the sea otter population. This is particularly true in light of the Region 10 Regional Response Team Wildlife Task Force's recent finding that there is a significant gap between the personnel and equipment identified in the Northwest Area Contingency Plan (NWACP) for oiled sea otter response and what actually is available on short notice.

Response SA3-25

Sea otters are listed in Draft EIS Appendix F, *Special-Status Species*, and impacts on all animals are covered in Draft EIS Chapter 3, Section 3.5, *Animals,* and Chapter 4, Section 4.7, *Impacts on Resources* (for oil spills).

Sea otters in the study area are rare. The Point Grenville and Destruction Island populations are not described in Section 3.5 because these areas are outside of the study area for the analysis of risks. Refer to the Master Response for Geographic Scope of the EIS for an explanation of how the extent of the study area was determined for different impacts associated with the proposed action.

Comment SA3-26

Southern Resident Orcas periodically utilize the offshore waters near Grays Harbor and the Columbia River entrance particularly in the winter and early spring where they prey on salmon and other fish. Orcas suffered high rates of mortality following the Exxon Valdez oil spill; the same would likely happen here if a similar size spill occurred while they are present. ESA listed Southern Resident Orcas rely heavily on Chinook salmon for prey, and an oil spill in Grays Harbor would eliminate a large portion of these preferred prey items from the area.

Response SA3-26

Final EIS Chapter 3, Section 3.5, *Animals*, reflects additional information on killer whale presence in the study area. Potential impacts on marine animals resulting from a spill in Grays Harbor are described in Draft EIS Chapter 4, Section 4.7.1.3, *Animals.*

Comment SA3-27

Potential Impacts to the Upland and Freshwater Environments

Each of the proposed projects will significantly increase the number of train transits through the area. These additional trains would transit tracks from Centralia to Aberdeen passing adjacent to, or crossing, numerous salmon bearing waters including the Chehalis, Black, Satsop, Wynoochee and Wishkah Rivers as well as numerous other fish bearing creeks and streams. There are 20 rail crossings of documented salmon spawning streams in Grays Harbor County alone. Loss of oil into these water could have a significant impact on resident and anadromous fish runs. Additionally, there are no effective oil spill containment and collection procedures identified for these waterways. The uncontrolled release of even one tank car could cause oil impacts for many miles downstream.

Response SA3-27

Because the analysis of environmental health and safety impacts does not predict the likelihood of a certain spill scenario affecting a particular sensitive resource, such as a specific river crossing, the required spill containment and collection procedures unique to any one resource are not evaluated. Draft Chapter 4, Section 4.7.1, *What would be the environmental impacts of a spill?*, addresses the types of impacts that could occur if oil spills, fires, or explosions affected water, plants, or animals. Section 4.7.1.1, *Water*, states that spills into adjacent surface waters or onto the ground could contaminate inland waters, associated wetlands, and underlying groundwater. The spilled material could expose aquatic and terrestrial plants and animals, aquatic habitats, shorelines, sediments, and humans to contamination. The type, duration, and extent of water resource impacts caused by releases of these potential contaminants depends on numerous factors.

Draft EIS Chapter 4, Section 4.2.2, *What framework prepares for an incident?* describes the formalized planning framework in place to address risks related to oil spills, fires, and explosions. Final EIS Section 4.2.2 has been revised to note that railroad operators would be required to develop spill contingency plans consistent with state requirements.

Comment SA3-28

About ten years ago, grain cars derailed on the Wynoochee Bridge, spilling grain onto pasture lands adjacent to the Wynoochee River. Had this been oil instead of grain, the river would have delivered this oil to the Chehalis and the surge plain immediately below it. This surge plain is protected by the Washington Department of Natural Resources (WDNR) as a natural area, and is one of the largest preserved natural surge plain habitats on the west coast. Spilled oil would be impossible to remove from this critical habitat. In 2014, there were three derailments over the course of less than three weeks-including one that involved more cars immediately adjacent to the Chehalis River in Aberdeen and another near the Wynoochee River. These recent incidents further reduce our confidence in the safety of this form of oil delivery to Grays Harbor.

Response SA3-28

As noted in Draft EIS Appendix M, *Risk Assessment Technical Report,* Section 4.2.2, *Accident Rates,* the determination of a chance of derailment or collision (i.e., accident rates) is based on data from the Federal Railroad Administration through October 2014. Train accident rates were collected from all operations on Class 2 track nationwide, both for mainline operations and for all track including main lines, industry tracks, yards, and sidings. The same data were collected specific to the PS&P rail line and summarized in Appendix M, Section 4.2.2, *Accident Rates*. As discussed in the Master Response for Risk Assessment Methods, the selected sources consider all causes of failure, including construction defects, natural hazards, human error, and material failures.

Comment SA3-29

Increased rail traffic also leads to potential increased train and wildlife interaction, including mortality from collisions. There are likely to be some hotspots for wildlife mortality along the rail and these are likely to correspond to adjacent habitats, migration/travel corridors, and/or human caused funneling of habitat. The loss of lactating females and adult nesting birds often results in secondary mortality to dependent offspring, which should be considered.

Response SA3-29

Final EIS Chapter 3, Section 3.5.5.2 *Proposed Action*, *Operations*, reflects additional information to address the habitat corridors along the existing rail corridor where there could be a higher risk of wildlife interaction with trains and mortality. The Final EIS recognizes the potential secondary impacts on dependent offspring. This additional information does not change the conclusions of the Draft EIS.

Comment SA3-30

The DEIS fails to fully account for the cumulative effects of additional rail traffic to wildlife (Chapter 3, page 22). Without considering the increased risk of accidental hazardous chemical release, the primary effects of increasing rail traffic include additional wildlife-train collision mortalities and, a greater barrier effect to the movement of species across the railgrade. The degree of barrier effect or probability of collision is species dependent. The negative effect will depend on total traffic volume, speed, and landscape effects. Since the proposed action is to increase rail traffic volume, the DEIS is wrong to conclude that increased rail traffic is not likely to affect species populations or fitness.

Response SA3-30

Final EIS Chapter 3, Section 3.5.5.2, *Proposed Action*, *Operations,* addresses additional wildlife mortality from potential collisions with trains as a result of increased rail traffic under the proposed action. As described in this section, the Final EIS concludes that the addition of approximately one train trip per day from the proposed action to an existing and operating rail line, where wildlife species along the rail line are likely habituated to disturbances associated with train movements, would not measurably alter species population or fitness. Consequently, the proposed action is not expected to have significant impacts in combination with other past, present, and reasonably foreseeable and similar future actions.

Comment SA3-31

As example, trains produce noise, often at high frequency or intensity, although typically of short duration at any one location. Noise level and duration have been correlated with decreased avian density and may affect wildlife behavior (Waterman et al., 2002) [*footnote 4: Waterman, E., I. Tulp, R. Reijnen, K. Krijgsveld and C. Braak 2002. Disturbance of meadow birds by railway noise in the Netherlands. Geluid 1:2-3*]. Increased rail traffic should result in greater noise.

Response SA3-31

Draft EIS Chapter 3, Section 3.5.5.2, *Proposed Action, Operations, Rail, Noise*, describes potential impacts of noise from additional rail traffic under the proposed action on animals. Given that the context is an existing and operating rail line, that noise from passing trains and horns would be short-term, that the distance from the rail line that Federal Railroad Administration wildlife noise disturbance thresholds would be reached are estimated to be small (50 feet of the rail line for wayside noise and between 100 and 200 feet from grade crossings for horn noise), and that the species along the rail line are already habituated to noise levels associated with rail operations and are generally mobile, impacts would likely not be significant and would not affect species populations or fitness.

Comment SA3-32

The best mitigation option for preventing collisions and reducing barrier effects are wildlife crossing structures. The benefit of any such structures would depend on their size, location, and design. Simple structures for amphibians and small mammals may include the excavation of rock ballast between pairs of railway sleepers, providing a shallow depression below the tracks for animal use (Pelletier et al., 2006) [*footnote 5: Pelletier, S.K., L Carlson, D. Nein and R.D. Roy. 2006 Railroad crossing structures for spotted turtles: Massachusetts Bay Transportation Authority - Greenbush rail line wildlife crossing demonstration project. In C.L. Irwin, P. Garett and K.P. McDermott (eds). Proceedings of the 2005 International Conference on Ecology and Transportation, pp. 414-425. Center for Transportation and the Environment, North Carolina State University, Raleigh. NC.*].

Response SA3-32

Wildlife connectivity along the rail line is already compromised because the corridor is existing infrastructure with existing rail traffic. The rail line also travels adjacent to developed areas (e.g., agricultural lands and municipalities) and along and immediately adjacent to U.S. Highway 12 and Monte Elma Road for substantial distances in the study area, and in some areas between these two transportation corridors. These developed areas and other transportation corridors also contribute to the already compromised wildlife connectivity in the study area.

Given baseline conditions, increased rail traffic (approximately one unit train trip per day) under the proposed action would not cause a significant impact on wildlife connectivity and fragmentation.

Refer to the Master Response for Mitigation Framework for additional explanation about how mitigation is proposed in the Draft EIS.

Comment SA3-33

Potential Impacts to Recreational and Commercial

Grays Harbor and adjacent ocean waters are home to many healthy marine fish and shellfish stocks, which are harvested in Washington's recreational and commercial fisheries, and upon which our coastal communities depend, including Dungeness crab, Pacific halibut, Pacific whiting, salmon, lingcod, sablefish, nearshore flatfish and rockfish species, forage fish-including anchovy, sardines, and mackerel- and oysters and razor clams. The average ex-vessel revenue for Washington's coastal commercial fisheries for the past five years exceeds $109 million, and commercial oyster growing operations in the harbor contribute significantly to the State's economy as well. It is imperative that the potential impacts to recreational and commercial fisheries resulting from a catastrophic event, such as an oil spill, and secondary effects like those from airborne pollutants from train diesel engines, disruption to commercial and recreational fishing opportunities from increased vessel traffic, and the subsequent effects on the economies of the local communities and broader state be analyzed and considered in this decision-making process.

Response SA3-33

As noted previously, the approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors,

Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment SA3-34

Recommendations

The Department of Ecology and the City of Hoquiam must assess the proposed action's significant indirect and cumulative effects fish, wildlife, and their habitats and the subsequent effects on recreational and commercial fisheries and commercial aquaculture facilities. The very real and significant risks that increased transport, storage, and shipping operations resulting from the proposal would present to vulnerable coastal and marine life need to be addressed.

WDFW recognizes that there are existing facilities nearby that pose potential threats to marine life now, the risks of a spill event significantly increase with the construction of the proposed new facility. Recovery from the devastating impacts associated with a spill on fish and wildlife resources will take decades and the economies of our coastal communities will undoubtedly suffer long term impacts that will have negative consequences on the fabric of the communities.

Response SA3-34

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, describes direct and indirect impacts of construction and routine operation of the proposed action on fish, wildlife, and fishing in the study area. The risks of oil spills, fires, or explosions related to the proposed action are addressed in Draft EIS Chapter 4, *Environmental Health and Safety*. The risks in the extended study area are addressed in Chapter 5, *Extended Rail and Vessel Transport*. Risks in the study area and extended study area under cumulative conditions are described in Chapter 6, *Cumulative Impacts*. For information about the risk analysis approach, Refer to the Master Response for the Environmental Health and Safety Analysis. For information about the risk analysis in the extended study area, refer to the Master Response for the Geographic Scope of the EIS.

Comment SA3-35

In general, WDFW recommends:

- State and federal entities with regulatory authority consider the relative proximity to vulnerable and irreplaceable fish and wildlife resources and their habitats when considering project approval and the siting determinations.

Response SA3-35

Refer to responses to detailed comments on fish and wildlife resources above. The Draft EIS evaluates the proposed site under SEPA requirements. These requirements do not include making a siting determination.

Comment SA3-36

- Creation of new jobs must be balanced with placing existing jobs and businesses at risk, particularly those current jobs that rely on healthy marine ecosystems. A thorough analysis of the existing jobs and their reliance on a healthy and vibrant ecological environment must be completed to understand the risks and consequences of a spill.

Response SA3-36

Refer to Response to Comment SA3-33.

Comment SA3-37

- While outside the scope of these two particular proposals, we recommend against siting any bulk fluid storage and transloading/shipping operation at Terminal 3. A decision to site crude-by-rail facilities on land immediately adjacent to the U.S. Fish and Wildlife Service's Wildlife refuge poses an unacceptable risk to this critical habitat.

Response SA3-37

Comment acknowledged.

Comment SA3-38

More specifically, to address the concerns we have identified, WDFW strongly recommends:

1. A series of status determination studies for key fish and wildlife populations in Grays Harbor and nearshore Pacific Ocean waters to establish a baseline prior to the construction of the proposed facility. The key populations would include forage fish, such as anchovy, herring, and smelt; nearshore and juvenile rockfish; nearshore flatfish; seabirds and shorebirds.
2. As a mitigation measure, should this project move forward, we recommend adequate funding be provided to WDFW for ongoing annual monitoring studies for the populations listed in item #1.

Response SA3-38

Information about the species that are known to or have the potential to occur in the study area is presented in EIS Chapter 3, Section 3.5, *Animals,* and in Appendix F, *Special-Status Species.* Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to include additional information about the potential impacts on sensitive species in the event of an oil spill, fire, or explosion. As noted in Draft EIS, the potential impacts on wildlife from construction and routine operations would be addressed through compliance with required best management practices and proposed mitigation measures. Potential impacts associated with an oil spill, fire, or explosion could be significant. The level of baseline information has been deemed sufficient for the purposes of supporting the conclusions presented in the Final EIS.

Additionally, Draft EIS Chapter 4, Section 4.4.3.1, *Applicant Mitigation,* proposes a mitigation measure that states that prior to beginning operations, the applicant will conduct a study to identify natural resources damages from an oil spill (among other things) and to determine the financial responsibility of such damages should an oil spill occur. Refer to the Master Response for Mitigation

Framework for an explanation of how the proposed mitigation measures were considered for inclusion in the Draft EIS.

Comment SA3-39

3. The Department of Ecology and the City of Hoquiam should host a series of inter¬agency discussions that include WDFW, the Quinault Indian Nation, and the Chehalis Tribe, to properly coordinate with these other entities with substantial interest before continuing to advance proposals that would bring additional bulk fluid storage and transloading/shipping operations to Grays Harbor. A focus should be placed on the areas of port safety, spill prevention measures, stand-by resources for spill containment, and contingency planning.

Response SA3-39

Comment acknowledged.

Comment SA3-40

4. Vessel Transportation Impact Analysis (VITA) be conducted relative to these specific proposals. This analysis should include evaluation of the items listed below, and should provide recommended solutions and mitigation measures to minimize any risks identified.
    a. The risk associated with the proposal's traffic (including the number and size of ships) increase relative to existing conditions, and the cumulative effects combined with existing conditions.
    b. The risk associated with traffic increase relative to existing navigation safety throughout the navigation channels associated with the Salish Sea (Strait of Juan de Fuca, Puget Sound, Georgia Basin, etc.), in Grays Harbor, and along the Washington coast.
    c. The risk associated with the combined Imperium and Westway Terminal traffic increase relative to potential increases of petroleum shipments from terminals with the Salish Sea (Strait of Juan de Fuca, Puget Sound, Georgia Basin, etc.)
    d. The capability of current tugs to control disabled vessel movements under the most adverse prevailing weather conditions in the area and respond to incidents in the harbor, outside the harbor entrance, and within a safe distance of the Washington shoreline, given that there is no ocean capable rescue tug stationed in Westport.
    e. The emergency tug availability from Neah Bay and Columbia River, include availability during severe weather or bar closures.
    f. How vessels will be managed offshore if the bars associated with Grays Harbor or the Columbia River are closed.
    g. The risks of incidents and measures to mitigate the risk for potential groundings, collision/allisions/loss of propulsion or oil spill while underway within the harbor and along the outer coast.

Response SA3-40

The *Vessel Traffic Impact Analysis for Imperium and Westway* was prepared by WorleyParsons (2014)[2] for the proposed action and REG (formerly Imperium Terminal Services) Expansion Project. The Draft EIS relies, in part, on this document as a source of information about vessel traffic in the study area, including characteristics of Grays Harbor and the navigation channel; vessel types, uses, and destinations; vessel traffic; and traffic management.

The Draft EIS presents an analysis of the potential direct, indirect, and cumulative impacts of the proposed action. The EIS includes an evaluation of the items identified by the commenter which are within the scope of study.

Draft EIS Chapter 4, Section 4.6, *Environmental Health Risks—Vessel Transport*, provides an assessment of risk related to vessel transport under the proposed action. Chapter 6, *Cumulative Impacts*, presents a discussion of risk related to the cumulative projects. See Master Response for Risk Assessment Methods for more information. Regarding impacts from increased vessel traffic generally and crude oil transport specifically in the Salish Sea and Washington Coast, refer to Master Responses for Geographic Scope of the EIS.

Final EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels*, reflects revisions to clarify the capabilities of the tugs stationed at Grays Harbor. One is a Z-drive tug and has comparable capabilities—horsepower, maneuverability, and fire monitor—to the emergency response towing vessel stationed at Neah Bay. For information about how vessel movements are managed in Grays Harbor and, in the event of bar closure, near Grays Harbor, refer to Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*. Also, Chapter 4, Section 4.6, *Environmental Health Risks—Vessel Transport*, presents an analysis of potential impacts from increased risk of vessel collisions, groundings, and allisions and related consequences (e.g., release of crude oil) under the proposed action. This section proposes mitigation measures to reduce the likelihood of a vessel incident.

Comment SA3-41

5. The EIS should include, at a minimum, the following analysis:
    a. Short- and long-term impacts of oil spills on the sensitive marine habitats and wildlife resources found within the project area, focusing on: State and Federally listed threatened and endangered species; resident and migratory birds and marine mammals; salt marshes, tidal flats, and other sensitive shallow water habitats; other WDFW listed Priority Habitat and Species (PHS); the marine fish and shellfish species important to recreational and/or commercial fisheries and commercial aquaculture activities. This should also include the analysis of the potential impacts of very low levels of hydrocarbon pollution from chronic small spills.
    b. An economic analysis of the current status of and potential impacts to recreational and commercial fisheries resulting from the direct or indirect effects of this project.
    c. Impacts to recreational and commercial fisheries resulting from additional shipping traffic during peak salmon runs, the possibility of shipping conflicts fishing gears, and the potential for displacement of fish away from normal fishing grounds due to increased shipping.

[2] WorleyParsons. 2014. *Vessel Traffic Impact Analysis for Imperium and Westway.* April 21.

d. The effects that increased barge and ocean going vessel traffic would have on fish, birds, and marine mammals. For example, gray whales are particularly susceptible to ship strikes, and the burrowing shrimp on which they feed are both susceptible to mortality form oil toxicity and would become vectors for delivery of sub-lethal doses of toxic compounds in oil to whales, green sturgeon, and other shrimp predators.

e. WDFW has documented bald eagles and great blue herons nest in the bay approximately one mile from the proposed site. Potential effects of construction noise should be addressed it is to occur during times that overlap with breeding season, and the impacts associated with the increased barge and vessel traffic will be passing by these nests within relative close proximity to the colonies should be analyzed.

f. The risks associated with potential train derailments, and resulting oil spills, to freshwater ecosystems along the rail corridors and the likely impacts to the associated aquatic organisms; evaluations should keep in mind the specific physical characteristics associated with individual products being transported along the rail lines.

g. The EIS include an analysis of the potential cumulative effects resulting from airborne pollutants from diesel engines form increased rail activity on the terrestrial and marine environment, including fish and wildlife.

Response SA3-41

The commenters topics are addressed below in the order provided.

a. Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, addresses the types of impacts that could occur if oil spills or fires affected water, plants, or animals, or aesthetic, recreational, cultural, or tribal resources. Section 4.7.1.2, *Plants*, addresses the potential impacts of oil on plants, including sensitive areas and habitats. Sensitive areas considered in the Draft EIS include the Grays Harbor Shoreline, Chehalis River Surge Plain Natural Area, and Grays Harbor National Wildlife Refuge/Bowerman Basin. Section 4.7.1.3. *Animals*, identifies potential impact on terrestrial and marine animals, including impacts from oil on the water surface, in the water column, and along shorelines, intertidal habitat, and other sensitive habitats. The potential impacts described would also apply to special-status species. Potential impacts on plants and animals resulting from increase in leaks and spills of petro-chemicals used in routine rail operations that could occur due to the increased frequency of rail traffic and associated maintenance, are described in Chapter 3, Section 3.4.5.2, *Proposed Action*, and Section 3.5.5.2, *Proposed Action*, respectively.

b. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

c. Draft EIS Chapter 3, Section 3.10, *Recreation,* Section 3.12, *Tribal Resources*, and Section 3.17, *Vessel Traffic*, address potential impacts on recreational, tribal, and nontribal commercial fishing, respectively, that could result from the construction and routine operation of the proposed action, including the potential impacts cited by the commenter.

d. Potential impacts on animals, including fish, birds, and marine mammals, resulting from routine vessel traffic related to the proposed action are described in Draft EIS Chapter 3, Section 3.5, *Animals*. Refer to Response to Comment SA3-24 for a description of updates in

the Final EIS with respect to the analysis of potential impacts on marine mammals from vessel traffic.

e. Potential impacts on animals resulting from noise associated with the construction and routine operation of the proposed action are described in Draft EIS Chapter 3, Section 3.5.5.2, *Proposed Action*.

f. The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods..

g. Refer to the Master Response for Cumulative Impact Analysis for an explanation of the resources considered for cumulative impacts in the Draft EIS.

Comment SA3-42

6. The project proponent(s) monitor train/wildlife collisions and create appropriate wildlife crossing structures to avoid collisions when and where hotspots for mortality are identified.

Response SA3-42

Refer to Response to Comment SA3-32 on wildlife connectivity and barrier effects along the rail line. Mitigation would not be warranted for this level of impact.

Comment SA3-43

7. Within the Special-Status Species section on page 3.5-6, include three federally listed special status species that are missing from this list: Coastal Cutthroat trout (Fco), River Lamprey (Fco), and Pacific Lamprey (Fco). Also, within the Forage Fish section on page 3.5-12, it should updated to include the Pacific Herring, which is also a special status species, being listed as both a Federal Species of Concern and as a State Candidate species.

Response SA3-43

The full list of special-status species in the study area is found in Draft EIS Appendix F, *Species-Status Species*, where coastal cutthroat trout, river lamprey, pacific lamprey, and Pacific herring are listed. Final EIS Chapter 3, Section 3.5.4, *What animals are in the study area?* has been revised to provide a reference to the appendix. Pacific herring is mentioned in text and Table 3.5-3 of Chapter 3, Section 3.5, *Animals*.

Comment SA3-44

8. The study area should be expanded to include the WA coastline along the routes expected to be traveled by the cumulative tanker traffic anticipated (see NWACP, GRP's; Outer WA coastline, Straits of Juan de Fuca, San Juan Islands, Admirality Inlet, North Central, Central, and North Puget Sound for additional information).

Thank you for the opportunity to review and offer comments on the Westway Expansion Project and the Imperium Renewables Proposal. We hope that Ecology and the City of Hoquiam are willing to engage WDFW and other entities potentially impacted by this proposal. As you know, Grays Harbor is the fourth largest estuary in the nation and it deserves our best effort to protect it for future generations and the natural resources that it supports.

If you have questions regarding our comments and/or recommendations, please feel free to contact me at (360) 249-1211 or Michele.Culver@dfw.wa.gov.

Sincerely,

Michele K. Culver
Regional Director

Cc: Jim Unsworth
Margen Carlson
Jeff Davis
Dave Kloempken
Amy Spoon

Response SA3-44

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

SA4, Washington State Department of Natural Resources, Megan Duffy

Comment SA4-1

Washington State Department of Natural Resources
Peter Goldmark - Commissioner of Public Lands
Caring for your natural resources . . . now and forever

November 24, 2015

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

Subject: Westway & Imperium Terminal Service Expansion Projects

To whom it may concern:

The Washington State Department of Natural Resources (DNR) appreciates the opportunity to comment on the Draft Environmental Impact Statements (EISs) for the proposed expansion of the Westway Terminal Company and Imperium Renewables bulk storage facilities at the Port of Grays Harbor. DNR is the proprietary manager of over 3 million acres of state trust lands comprised of forest, range, commercial, and agricultural lands, and 2.6 million acres of state-owned aquatic lands. The agency is committed to sustainable management of state resources, relying on sound science and a transparent environmental review process to make informed decisions that benefit the public interest.

The proposed expansion of Westway Terminal Company and Imperium Renewables bulk liquid storage facilities adjacent to Terminal 1 at the Port of Grays Harbor would support receipt, storage, and shipment of petroleum products, including Bakken crude oil. Proposed on-site construction activities include (1) installing above ground storage tanks to support cumulative storage capacity of approximately 100 million gallons; (2) improving rail infrastructure within the facilities; (3) installing marine vapor combustion units; (4) building a network of pipelines to transport bulk liquids to and from rail cars, storage tanks, and tank vessels. No in-water work is proposed for either facility. Off-site activities include rail transportation of crude oil to the facilities from Bakken formation in North Dakota and by vessel from the facilities to refineries in Puget Sound and California. Cumulatively, the expanded facilities could support a throughput of up to 47.9 million barrels of crude oil, generating up to 638 additional vessel trips within Grays Harbor and 1188 rail trips throughout Washington State.

Upland areas associated with the proposed construction activities are located on property owned by the Port of Grays Harbor. The footprint of the marine terminal is located on state-owned bedlands, but management authority has been delegated to the Port of Grays Harbor under a Port Management Agreement (PMA) per RCW 79.105.420. The Port maintains authority over operational management activities and infrastructure development within the PMA; however, the State retains underlying fee-simple ownership of all state-owned aquatic lands subject to the PMA. The Port must manage state-owned aquatic lands within the PMA in a manner that is consistent with the aquatic

land policies of RCW 79.105-79.140, and Washington Administrative Code 332-30. The State retains ownership and management authority over state-owned aquatic lands adjacent to the PMA.

DNR's comments primarily focus on the potential impacts of oil spills, explosions, and fire associated with transport of crude oil by rail and marine vessels. A large scale spill and/or explosion would result in significant and unavoidable damages to state-owned resources and could undermine DNR's ability to sustainably manage public lands. The Draft EISs disclose that although the risk of a large-scale spill and/or explosion is low, mitigation measures cannot eliminate the risks of such an incident. DNR requests the FEISs comprehensively analyze all (1) reasonable and technically feasible design and operational measures to maximize spill prevention; (2) personnel and equipment response capabilities in the event of a worse-case spill scenario; and (3) potential damages to natural resources. This information is critical to understanding the true scope of the risks to Washington state residents and environmental resources presented by the proposed expansion of storage and handling of crude oil within Grays Harbor and associated oil transport throughout the region.

Although DNR does not retain management authority within the proposed footprint of the expanded terminals, the agency respectfully submits the following comments as the manager of (l) adjacent state-owned aquatic lands within Grays Harbor and (2) state-owned uplands and aquatic lands that are located within and adjacent to the transportation corridors identified to support movement of bulk liquids throughout Washington. This letter provides comments and recommendations that build upon those previously submitted by DNR during the EIS scoping process [May 26, 2014].

Should you have any questions regarding this letter, please do not hesitate to contact Megan Duffy at (360) 902-1034.

Sincerely,

Megan Duffy
Deputy Supervisor for Aquatics & Geology

Attachment (1)

Response SA4-1

Draft EIS Chapter 4, Section 4.2.1, *What framework prevents incidents from happening?* describes the formalized planning framework in place to address risks related to oil spills, fires, or explosions from the terminal operations, rail transport, or vessel transport. The responsible party may vary during the transport of crude oil. This section describes the requirements for planning and preventive equipment and design. Section 4.2.2, *What framework prepares for an incident?* describes federal and state regulations to prepare for an incident, the integration of plans, and drill and exercise requirements.

Final EIS Section 4.2.2 has been revised to indicate that railroad operators would now be required to develop spill contingency plans consistent with state requirements and a mitigation measure is proposed for a contingency plan to be submitted to Ecology until the new state rule is in effect. Final EIS Section 4.2.3, *What framework provides responses to an incident?* has also been updated to better reflect existing response capabilities and resources in the study area, including information identifying existing gaps from the Marine and Rail Oil Transport Study (Ecology 2015). Final EIS

Section 4.7, *Impacts on Resources,* has been updated to better reflect how the proposed action could affect emergency service responses.

Final EIS Chapter 4 reflects additional mitigation measures proposed to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

Chapter 4 also identifies other proposed measures to ensure that broader prevention, preparedness, and response planning involves the appropriate stakeholders and that updates to any plans applicable to reducing risks related to the proposed action contain appropriate applicant information and participation. To the extent possible, as outlined in the Master Response for Mitigation Framework, measures that address the need for more coordinated and focused planning clarify the role of the applicant as appropriate.

Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7 describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation. For more information about the analysis of potential impacts in the extended study area, refer to the Master Response for the Geographic Scope of the EIS for additional information.

Comment SA4-2

Attachment
Westway & Imperium Terminal Services Expansion Project DRAFT EIS

The Department of Natural Resources (DNR) submits the following comments on the DRAFT Environmental Impact Statements for the Westway and Imperium marine export terminal expansion projects. Comments consider local, regional, and statewide impacts of the proposed facilities. All comments are intended to apply to both facilities unless otherwise specified.

Response SA4-2

Refer to the Master Response for the Geographic Scope of the EIS.

Comment SA4-3

On-site & Local Transport

<u>Grays Harbor Shellfish Resources (Chapter 3.5.5 and Chapter 4.7.1.3)</u>

The Draft EIS does not substantively consider the regional importance of or potential impacts to the aquaculture industry within Grays Harbor. Grays Harbor County supports approximately 2,288 acres of oyster and clam aquaculture. Collectively, this represents about 8 percent of shellfish aquaculture in Washington state and generated an economic impact of nearly $12 million in 2010 (Pacific Shellfish Institute 2013). DNR leases more than 440 acres of state-owned aquatic lands for oyster aquaculture that generates revenue for resource management and enhancement of and public access to aquatic lands. The Final EIS should clearly analyze the range of possible spill scenarios (e.g., size of release, potential response times, and weather conditions) that would involve

contamination and closure of both commercial and recreational shellfish areas. The analysis should evaluate spill response measures that would minimize exposure potential for valuable shellfish resources in the event of a release of crude oil. Estimates of potential clean-up costs, temporary and permanent resource damages, and ecosystem recovery times should be disclosed. The Final EIS should also identify under what scenarios a release of crude oil could theoretically reach Willipa Bay, the State's most productive shellfish growing area.

Response SA4-3

The analysis of risks presented in Draft EIS Chapter 4 is based on assessing the risks related to a set of spill scenarios as discussed the Master Response for Environmental Health and Safety Analysis. Appendix M, *Risk Assessment Technical Report,* and Appendix N, *Oil Spill Modeling*, do not predict precise oil spill sizes or locations where spills might occur. This approach provides decision-makers and planners with a range of potential outcomes related to the proposed action to help them understand potential risks and propose targeted mitigation measures. By extension, the Draft EIS does not predict the consequences that would affect individual resource areas or populations along rail and vessels transportation corridors with any one release scenario. Rather, Final EIS Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident were to occur and reflects additional information about potential impacts on shellfish, including the potential for prolonged recovery. Refer to the Master Response for Oil Spill Modeling Methods for additional information about the approach to, input assumptions for, and limitations of the oil spill modeling.

Comment SA4-4

<u>Tsunami Loads and Tsunami Risk (Chapter 3.1.7 & Appendix C)</u>

The Draft EIS does not consider the full range of potential tsunamis debris that could harm the structural integrity of the proposed storage tanks or laden rail cars. Failure to account for larger sized tsunami debris items could result in inadequate design specifications and increase the risk of a catastrophic oil spill in Grays Harbor. The applicant proposes to assess the technical feasibility of constructing the proposed facilities to withstand a CSZ L1 tsunami event. The calculations of theoretical tsunami loads in the Tsunami Impact Modeling and Analysis are based on “lumber or wood log-oriented longitudinally as debris.” FEMA 646 lists a number of potential debris items to be used in this estimate. The Draft EIS selected the small debris item with no explanation of the suitability of that selection. The size, and therefore draft, of debris entering the site from outside of the project area depends in part on depth of inundation necessary to float debris over the upland berm. There is no explicit calculation of the size (draft) of debris that can float over the berm and therefore what would be the most appropriate object to consider. Although less of an issue for objects within the perimeter of the berm, it would also be appropriate to discuss what the maximum potential floating debris that is already within the project area. The Final EIS should modify the Tsunami Impact Modeling and Analysis to account for the full range of potential tsunamis debris. It should also specifically evaluate the technical and financial feasibility of meeting the identified design specifications.

The Draft EIS analyzes the risk associated with inundation of the storage tanks and rail loading and unloading facility during a tsunami event. However, the Draft EIS does not provide analysis of potential impacts to dock and vessel operations. The Final EIS should analyze the potential impacts associated with a large scale tsunami on tank vessel loading and offloading or transiting the harbor.

Should a tsunami warning be issued, what actions would be taken to avoid spills associated with oil transfers or laden tank vessels at the dock? What actions would be taken to avoid inundation or collisions of vessels docking at the facility due to a tsunami? Under what scenario could vessels leave the harbor or take other actions to reduce risks within the harbor?

Response SA4-4

Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis,* calculates debris forces based on guidance from the Federal Emergency Management Agency,[3] which was developed for structures that would provide vertical refuge for evacuees above the level of tsunami inundation. Factors used in this document were derived from laboratory simulations of impenetrable vertical walls. Tsunami-borne debris may not accumulate around a circular tank the same way it would against a vertical structure. Stiffness between debris and vertical structures would differ from stiffness between debris and circular tanks, and impact and damming forces would likely differ for the proposed facility and evacuation facilities. Uncertainties also exist regarding the size and type of debris that would float over the berm surrounding the site. However, these uncertainties are accounted for in the tsunami analysis by applying a safety factor of 1.3, as described in Appendix C.

As described in Draft EIS Chapter 3, Section 3.1.7.1, *Applicant Mitigation*, the applicant will ensure that a tsunami evacuation and emergency management plan for the facility is prepared prior to beginning operations. The local communities have safety plans in place for tsunami evacuation. The applicant's facility safety plan will align and coordinate with the City of Hoquiam's evacuation plan for safety consistency.

Refer to the Master Response for Seismic Risk and Design Requirements for more information.

Comment SA4-5

<u>Escort Tugs & Vessel Traffic Management (Chapter 3.17.5 & 4.6.3)</u>

The Draft EIS states that "at least one escort tug must accompany a laden tanker or tank barge carrying oil between Hoquiam River and Grays Harbor entrance, and two tugs (one escort tug and one assist tug) must assist the vessel during mooring procedures." Although DNR supports the mandatory requirement for tug escorts for laden vessels to reduce risk of a vessel collision or allision within Grays Harbor, the Draft EIS states that a third tug escort may be used under certain weather conditions. The Final EIS should discuss under what weather conditions and operational scenarios a third escort is warranted. It should also discuss how this would impact escort tug capacity within Grays Harbor during these conditions.

Response SA4-5

Chapter 3, Section 3.17.5.2, *Proposed Action*, notes that state-licensed pilots may require a third tug to assist with docking or undocking maneuvers of large commercial vessel when environmental conditions warrant (such as high winds); the decision to use a third tug is made by the pilots. Final EIS Section 3.17.5.2 reflects additional information to further quantify tug needs in Grays Harbor over the planning period with the proposed action and to support the determination that tug capacity would be sufficient to assist and escort the projected commercial vessel traffic.

[3] Federal Emergency Management Agency. 2008. *Guidelines for Design of Structures for Vertical Evacuation from Tsunamis*. FEMA-P646. Washington, D.C.

Comment SA4-6

The Draft EIS states that an emergency response towing vessel is available at Neah Bay to assist with vessels off the coast and in Puget Sound. Although available to respond to incidents in or near Grays Harbor, the vessel has a 12 to 18 hour response time depending on weather conditions. DNR requests that the Final EIS analyze the various scenarios under which the emergency response vessel would be summoned to assist with tank vessels operating in or near Grays Harbor. What capabilities does the emergency towing vessel provide that cannot be performed by the Z-tugs currently stationed at the Port of Grays Harbor? Understanding the potential need for the Neah Bay emergency vessel is important to evaluating whether maintaining an emergency towing vessel at Grays Harbor is warranted to minimize the hazards involved with the proposed terminal expansion.

The Draft EIS states that Z-drive tugs are capable of leaving Grays Harbor to assist disabled or damaged vessels. The Final EIS should discuss under what scenarios Z-drive tugs are available to leave the harbor to assist with emergencies. It should also discuss the availability of Z-drive tugs to support offshore rescue operations assuming normal operational requirements within the harbor entrance. Understanding the regional capacity to respond to infrequent emergencies outside the harbor should not be overlooked in considering escort tug capacity within the harbor -especially given that the nearest emergency vessel is a minimum of twelve hours away.

Response SA4-6

Draft EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels, Tug Services*, specifically states that the tugs working in Grays Harbor are able to assist a disabled or damaged vessel outside of the harbor, at sea. The decision about how to support a vessel in distress is, above all, a safety decision that must be made by the U.S. Coast Guard, the vessel master, and the state pilot if aboard the vessel.

Comment SA4-7

The Draft EIS identifies a series of potential mitigation measures to have the Grays Harbor Safety Committee work with the USCG to research the need for vessel traffic service; one-way channel transit along the inner harbor for laden vessels; designated anchorage areas; and requiring all tank vessels and barges to take a Grays Harbor pilot while transiting Grays Harbor. These mitigation measures “under consideration” represent important uncertainties in terms of vessel transit and safety that need to be addressed prior to initiating operations. DNR recommends the Final EIS include research and findings related to these measures and that the results be used to inform the formal vessel management system would be required to be active prior to initiating crude oil exports. At a minimum these measures should be moved from “Other measures to be considered” to “applicant mitigation.”

Response SA4-7

Vessel transit and safety is regulated by the U.S. Coast Guard. The standards of care developed by the Grays Harbor Safety Committee provide best practices but do not replace regulatory requirements. The Draft EIS identifies three categories of mitigation that would help minimize potentially significant impacts: voluntary measures and design features, applicant measures, and other measures. As discussed in the Master Response for Mitigation Framework, the first two categories propose measures that could be required of the applicant and would be enforceable by a permit. The third category, other measures, are identified in the Draft EIS even if they are outside the control of

the applicant and no specific regulatory process may be in place to require implementation. These measures are still important to identify because they help decision-makers and planners prioritize actions within their authority and jurisdiction to implement.

As noted in the comment, these other measures are primarily associated with minimizing the impacts associated with rail or vessel transport to and from the project site and in some cases would require extensive coordination across local, state, and federal agencies, as well as other stakeholders, including the Grays Harbor Safety Committee. To the extent possible, the role of the applicant has been clarified in the Final EIS with respect to these other measures consistent with the regulatory framework described in detail in the Master Response for Mitigation Framework.

Comment SA4-8

Rail Infrastructure (Chapter 4.5.2 & Appendix M)

The Draft EIS states that there were four train derailments on the PS&P line between Grays Harbor and Centralia in 2014. Table 6 in the Risk Assessment Technical Report presents a 4-year average for accident rates on the PS&P mainline that is over 18 times higher than the national average for Class 2 mainline track. The PS&P mainline parallels the Chehalis River and the Chehalis River Surge Plain Natural Area, two sensitive habitats managed by DNR. A derailment of and subsequent release from laden tank cars poses a serious threat to these resources.

Response SA4-8

Draft EIS Appendix M, Section 4.2.2, *Accident Rates*, explains the data sources and rationale for determining the accident rates used in the risk assessment. As noted in Section 4.2.2, a chance of derailment or collision is based on accident rates derived from Federal Railroad Administration data finalized through October 2014. Train accident rates were collected from all operations on Class 2 track nationwide, both for mainline operations and for all track including main lines, industry tracks, yards, and sidings. The same data were collected specific to the PS&P rail line. Although PS&P accidents rates through 2014 are roughly ten times the national average, at 2.2E-5 per train mile, with the changes made by PS&P since the accidents in April and May 2014, and assuming the improvements that PS&P has planned prior to implementation of the proposed actions, a long-term rate of 1E-5 per train mile was applied in this analysis. This is still higher than the national average for accidents. Refer the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment SA4-9

The Draft EIS does not adequately describe what infrastructure maintenance and/or repairs have been completed and/or scheduled to reduce the risk of accidents prior to transporting crude oil along this corridor.

Section 4.5.2.1 states that federal regulations for high-hazard flammable trains (49 CFR 171-180) require operating speeds to not exceed 40 mph and emphasizes that the PS&P line is limited to 25 mph or less. However, all four of the local trains that derailed in 2014 were traveling at speeds between 5-10 mph - well below the maximum speed limit. The Final EIS should include a comprehensive analysis of the high risk sections of the PS&P mainline, recently completed and planned infrastructure improvements, and opportunities and constraints for additional improvements that could increase mainline safety. Without a clarification of how these

improvements decrease the likelihood of a derailment, the statistical references assuming a reduction in accident risk from 15.95 to 10 accidents per million train miles appear speculative and may misrepresent the true risk as indicated by recent incidents along the PS&P line.

Response SA4-9

As noted in the Master Response for Baseline and No-Action Alternative, the Draft EIS considers the potential for reasonably foreseeable changes that would occur unrelated to the proposed action, including planned infrastructure improvements on the PS&P rail line and regulatory requirements for improved rail tank car design. The specific assumptions relevant to the rail traffic and safety analyses are described in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, and Appendix M, *Risk Assessment Technical Report*. As noted, the risk assessment evaluates the likelihood of certain incidents occurring and considers all causes of failure, including construction defects, natural hazards, human error, and material failures.

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment SA4-10

<u>Crude-by-Rail Spill Response Planning (Chapter 4.5)</u>

DNR applauds the expansion of facility contingency planning requirements (RCW 90.56.210) to include railroads as enacted in Laws of 2014, Chapter 273. The law directs the Department of Ecology to adopt rules establishing contingency plan requirements for the railroads transporting bulk oil in Washington. However, this effort has not been completed and the applicant states that federal oil spill response plans will be used to meet the state requirement prior to rule adoption. Interim federal oil spill response plan requirements (49 CFR 130) are outdated and do not adequately protect Washington state natural resources. Rules do not require equipment and personnel to be contracted at sufficient levels to support immediate and effective spill response in the event of a train-related spill. This places an unrealistic reliance on already over-taxed and potentially undertrained local first responders.

Response SA4-10

As noted in the revisions to Final EIS Chapter 4, Section 4.2, *Applicable Regulations*, a new rule, WAC 173-186, Oil Spill Contingency Plan—Railroad, has been finalized that establishes railroad oil spill contingency plan requirements, drill and equipment verifications that would be required of PS&P prior to operations. The mitigation measure presented in Draft EIS Chapter 4, *Environmental Health*

and Safety, recommending that contingency planning by PS&P be completed will remain in place into the rule takes effect.

Comment SA4-11

The Draft EIS provides insufficient details on the existing capabilities and training of local first responders. This information is critical to understanding the regional level of emergency preparedness to deal with significant spills of Bakken crude oil. The Final EIS should outline minimum contracted equipment and personnel resources required to ensure rapid and effective spill response capabilities, where they will be stationed, and their response times to various spill scenarios along the rail transportation corridor as part of the proposed interim contingency planning requirements until permanent state rules are adopted. Spill response contractors are only available for immediate response if a contract is executed prior to a spill.

Response SA4-11

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Final EIS Chapter 4, Sections 4.4.3, 4.5.3, and 4.6.3, include applicant measures to ensure the appropriate response equipment is available within acceptable timeframes. Additionally, as noted the previous response, proposed mitigation includes a recommendation that PS&P complete contingency planning before the applicant begins operations. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment SA4-12

<u>Crude-by-Rail Financial Responsibility and Advance Notice of Transfers (Chapter 4.5)</u>

The Draft EIS identifies as a mitigation measure to be considered that "Ecology should urge the legislature to amend current laws, including RCW 90.56, RCW 88.40, and RCW 88.46 to require contingency plans, advance notice of transfers, and certificates of financial responsibility from railroads transporting oil, including PS&P." This is not an applicant-driven mitigation measure.

Response SA4-12

This measure is not a proposed mitigation measure for the applicant. The recommendation has been removed in the Final EIS because it has been addressed through rulemaking.

Comment SA4-13

DNR supports the requirement for advance notice of transfers and certificates of financial responsibility; however, the measure requires no commitment by the project proponent and does nothing to ensure a responsible party has the financial resources that provide for recovery of the full costs of cleanup and natural resources damages. The Draft EIS also leaves considerable ambiguity

around the responsible party: is the owner of the oil, the shipper, or the railroad ultimately responsible for environmental damages? DNR requests this is clarified in the Final EIS.

Response SA4-13

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment SA4-14

<u>On-Site Spill Containment and Response (Chapter 4.4 and 4.7)</u>

The Draft EIS proposes applicant mitigation to conduct an independent engineering analysis and feasibility study for pre-booming oil transfers. The results of this study should be disclosed in the Final EIS. This information is needed to understand feasible oil spill prevention and containment alternatives and to assess the true risks involved in operating a crude oil export facility at Terminal 1.

If pre-booming is not feasible, to what extent are on-site spill containment and response capabilities compromised? How effective are the proposed alternative measures compared to pre-booming? How far could the released oil travel in the small, medium, and large spill scenarios before alterative response and containment measures could be deployed? Wha is the potential impact to aquatic resources in each of these scenarios?

Response SA4-14

The mitigation measure proposing the independent engineering analysis and feasibility study, described in Draft EIS Chapter 4, Section 4.4.3.1, *Applicant Mitigation*, would be submitted prior to the first oil transfer operation. If the analysis and feasibility study finds no measures are feasible to allow for prebooming, WAC 173-180 identifies alternative requirements that must be met. Chapter 4 discusses spill scenarios and risks from facility operations, including vessel loading, and the potential impacts on resources in the event of a spill.

Comment SA4-15

The Draft EIS states that drains on the dock will be blocked prior to oil transfers. What is the storage capacity of containment features on the dock to prevent releases from reaching the water? How does this capacity relate to projected oil transfer rates?

Response SA4-15

Draft EIS Chapter 4, Section 4.4.2.1, *Oil Spills, Prevention*, describes design standards and personnel training and certification related to preventing oil spills at the proposed facility. The mitigation measure referred to by the commenter, presented in Draft EIS Chapter 4, Section 4.4.3.1, *Applicant Mitigation*, is a best practice intended to prevent small spills during transfers, which the Draft EIS notes may occur more frequently. Blocking the drains is not intended to act as permanent containment to meet regulatory requirements but serves as a preventive measure.

Comment SA4-16

The Draft EIS discusses the potential for a large-scale spill that would result in the total release of the contents of one storage tank (approximately 80,000 barrels at Imperium; 200,000 barrels at Westway) from material failure, containment failure, or seismic or tsunami event.

Although the documents disclose adverse environmental impacts would be significant and unavoidable, it does not provide a complete assessment of the ecosystem damage, clean-up timeframes and costs, regional economic losses, or timeframes for ecosystem recovery. The Final EIS should provide additional details on potential population level impacts to sensitive species and percentage of nearshore habitat types impacted by oil based on the various small, medium, and large scale spill scenarios. This information is important to understanding regional economic impacts and the level of ecosystem resilience in the event of a large spill.

Response SA4-16

Final EIS Chapter 4, *Environmental Health and Safety*, addresses potential impacts from various spill scenarios. As discussed in the Master Response for Environmental Health and Safety Analysis, because the approach used in the risk assessment did not predict the specific consequences that would affect individual resource areas or populations along rail and vessels transportation corridors, Draft EIS Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident occurs. Final EIS Section 4.7 has been revised to acknowledge the potential for prolonged recovery after a spill. Final EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, reflects additional information about the range of impacts, including societal costs that could occur in the event of an incident.

Comment SA4-17

DNR also requests additional discussion of the impacts of a worse-case scenario. Currently, the large spill scenario assumes the full release of the entire contents of one storage tank. Cumulatively, the two projects propose 14 storage tanks and in the event of major natural disaster—albeit this has a low probability of occurrence—it seems plausible that infrastructure damages could result in release of the contents of more than one tank. Given that storage tank containment at the facilities is required to hold the contents of the largest tank, any additional failures would be released directly into the environment.

Response SA4-17

All the release scenarios considered in the risk assessment were developed in accordance with applicable regulatory requirements and based on project-specific information. To that end, worst-case release volumes were considered consistent with WAC 173-182-030 and WAC 480-62-300 as discussed in the Master Response for Environmental Health and Safety Analysis.

Comment SA4-18

The Draft EIS provides limited information about potential vessel refueling at the site. If vessels are going to be fueled within Grays Harbor, the Final EIS should discuss fueling operations and measures to both avoid and respond to potential spills.

Response SA4-18

Final EIS Chapter 2, *Proposed Action and Alternatives*, clarifies that proposed operations would not include vessel bunkering (refueling) at the project site. Final EIS Chapter 4, Section 4.6, *Environmental Health Risk—Vessel*, and Chapter 5, *Extended Rail and Vessel Transport*, reflect additional information about federal and state regulations related to bunkering operations.

Comment SA4-19

Berthing Capacity & Oil Transfer Rates (Chapters 4 and 6)

The draft EIS states that vessel transfers are anticipated to take between 24 and 48 hours depending on tank vessel size, but does not specify proposed transfer rates in barrels per unit measurement of time. The final EIS should disclose potential transfer rates and elaborate on how these figures were utilized to inform (1) the potential spill scenarios evaluated in the Environmental Health Risks analysis, and (2) the berthing capacity analysis for Terminal 1.

Response SA4-19

As identified in the applicant's Notice of Construction Application (Trinity Consultants 2015),[4] loading rates could vary between 10,000 and 20,000 barrels per hour. Based on these loading rates, a tank barge with a 150,000-barrel capacity would require between 7.5 and 15 hours to load; a tanker with a 360,000-barrel capacity would require between 18 and 36 hours to load. Assumptions for berth occupancy times for tank barges and tankers, 24 and 48 hours, respectively, account for docking, preloading activities (e.g., Declaration of Security, Declaration of Inspection, possible U.S. Coast Guard inspections, oil spill prevention measures, vessel inspection by surveyor) loading of product, gauging of vessel holds by surveyor, and preparation for departure (e.g., hose retraction, taking on of stores). Additionally, the tanker estimate accounts for time that may be needed to wait for an ideal tide for transit. Predicted release rates for the scenarios evaluated in Appendix M, *Risk Assessment Technical Report*, were based on a number of past studies that analyzed historical data along with guidance for use in risk assessments as described in Chapter 3, Section 3.2, *Approach and Data*, of the appendix.

Comment SA4-20

The draft Cumulative Impacts analysis states that industry best practices for bulk liquid terminals assume 90 percent berth availability, equating to the capacity of Terminal 1 to receive vessels 328 days per year. Assuming 100 percent of vessel calls associated with the proposed expansion (projected maximum of 319 calls) are completed by tank barges, cumulative berthing occupancy would reach 363 days per year- exceeding projected capacity by 35 days. The draft EIS states that if some proportion of vessel calls were completed by tankers - as opposed to tank barges - berth occupancy could be as low as 318 days per year. The assumptions and calculations supporting the capacity analysis are not clearly documented. The final EIS should identify what combination(s) of vessel types are necessary to ensure berth capacity is not exceeded. Although tankers have increased storage capacity, they also require longer transfer periods and have increased constraints with respect to navigation windows within the harbor.

[4] Trinity Consultants. 2015. Westway Terminal Company LLC Crude by Rail Project for Hoquiam Terminal—Westway's Response to ORCAA's December 5, 2014 Preliminary Required Revisions for NOC Application. June 23.

Response SA4-20

Final EIS Chapter 6, Section 6.5.6, *Vessel Traffic,* reflects the addition of a footnote explaining the calculations for berth occupancy assuming that all vessels are tankers. The analysis of berth capacity is based on the assumptions described in Draft EIS Section 3.17, *Vessel Traffic*, and Appendix M, *Risk Assessment Technical Report*; the Draft EIS does not specify exact combinations of vessel types to ensure berth capacity is not exceeded.

Comment SA4-21

Under what scenarios could additional deep water berth capacity be required to support the proposed maximum throughput of bulk liquids? If the proposed terminal expansion could contribute to a long-term need for additional berth capacity, the potential impacts of additional infrastructure should be considered.

Response SA4-21

The proposed action does not include the construction of additional vessel berths.

Comment SA4-22

<u>Proposed Bulk Liquids (Chapter 4.3)</u>

The document states that both Bakken crude and diluted bitumen oil will be received at the proposed facilities. Will mixing of fuels will be conducted on-site in order to meet order specifications? Mixing can alter physical and chemical properties of oil and complicate effective spill response if not communicated properly. Contingency planning standards for coal tar sands are still being developed.

How would the long-term projections for crude oil throughput - and associated rail and vessel transit—change if the U.S. lifted the ban on crude oil exports?

Response SA4-22

The proposed action would include receiving and unloading crude oil by rail, storing on site, and loading to vessel for transport. Proposed operations do not include blending or manufacturing. As described in Final EIS Appendix Q, *Crude Oil Market Analysis*, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States in December 2015, the likely destination for crude oil transshipped through the proposed facility remains West Coast refineries in Puget Sound and California. Refer to Appendix Q and the Master Response for Crude Oil Extraction, Transport, and Combustion for more information.

Comment SA4-23

<u>Propeller Wash and Vessel Wake (Chapter 3.3, 3.5 and 3.17)</u>

The Draft EIS does not provide sufficient details to support the claim that only small, incremental impacts to water quality, fish species, and benthic habitats are expected from the proposed increase in vessel trips. The proposed action would approximately double the number of vessel trips within the harbor. The Final EIS should model potential vessel wave energy levels generated by different

types of ships at representative speeds. How do the energy levels generated by a representative cargo ship compare to an average tank vessel?

Response SA4-23

A 2003 wave modeling study conducted by Pacific International Engineering[5] (for the Port of Grays Harbor and coastal communities of southwest Washington) to address Washington Department of Natural Resources concerns about potential wave impacts on state-owned aquatic lands caused by the navigation channel in Grays Harbor concluded that, "energy from wind-generated waves generated in Grays Harbor and vessel-generated waves are shown to be insignificant in relation to the contribution from oceanic waves." The study focused on the Washington Department of Natural Resources Natural Preserve Whitcomb Flat, which is a sandflat that is mostly submerged during high tide and exposed during low tides; it is directly adjacent to the navigation channel and is the nearest unprotected erodible feature to the navigation channel. The study concluded that waves from vessels (a variety of large commercial vessels traveling at 15 knots were modeled) made an insignificant contribution to all waves and that natural waves (storm waves and swell from ocean) were the driving force that affected the movement and erosion of the sandflat. Although large, deep-draft vessels have been shown to result in increased vessel wake, based on the results of this study, it is not possible to separate the potential impacts attributable to a vessel from those caused by natural processes.

Comment SA4-24

How could this change in wave energy within the harbor potentially impact salmonid nearshore migration and Pacific herring spawning along Damon Point and South Bay? What vessel mitigation measures (e.g., speed limited and tidal restrictions) could be proposed to minimize the threat of fish standings and shoreline erosion?

Response SA4-24

Pacific herring spawning locations along the South Bay shoreline are, at a minimum, 2.85 miles from the navigation channel, and the conclusions of the 2003 wave modeling study[6] indicate that vessel wakes would be immeasurable at these locations, compared to natural waves in Grays Harbor. Another spawning site is more than 1 mile north of the navigation channel along the Westport Airport, but Whitcomb Flats is located between the navigation channel and the spawning site. A third spawning site is more than 0.5 mile from the navigation channel in the Westport Marina, but the site is largely protected by an existing breakwater. A fourth spawning site is located in South Bay approximately 1.65 miles south of the navigation channel, but again, Whitcomb Flats lies between the site and the channel. One spawning site is found on the north side of Damon Point (nearly 2 miles north of navigation channel), but it is completely protected from any vessel wakes because Damon Point is entirely between the spawning site and the navigation channel. Thus, no herring spawning sites are subject to measurable vessel wakes or any associated effects.

[5] Pacific International Engineering. 2003. *Dynamics of Whitcomb Flats.* Grays Harbor. July 10. Prepared for Port of Grays Harbor in Coordination with the Coastal Communities of Southwest Washington.

[6] Pacific International Engineering. 2003. *Dynamics of Whitcomb Flats.* Grays Harbor. July 10. Prepared for Port of Grays Harbor in Coordination with the Coastal Communities of Southwest Washington.

Comment SA4-25

The Final EIS should identify the specific tides levels at which various types of ships are expected to generate propeller wash that could disturb benthic habitats and degrade water quality. What is the minimum under keel clearance required to avoid and minimize potential impacts? Does the applicant propose to avoid transit of certain size and draft ships below certain tide levels to avoid these impacts? If not, with what frequency do we expect these impacts to occur? Would these impacts be confined to certain areas of the shipping channel and/or berthing areas? How are these impacts different if the channel is not deepened to the anticipated 2017 Project Depths?

Response SA4-25

Tankers related to the proposed action would be restricted to travel in the navigation channel and tank barges and tugs would be expected to travel in the navigation channel. As stated in Draft EIS Chapter 3, Section 3.3, *Water*, the area of the channel near Terminal 1 and the Cow Point Turning Basin already have high baseline turbidity levels; any resuspension of sediments from vessel movements or propeller wash in this area of existing high turbidity levels is likely to have little or no additional impact on the benthic communities living in these turbid environments. Similarly, because temporary resuspension of sediments in the navigation channel occurs on a regular basis, it is unlikely that vessel traffic associated with the proposed action would cause any perceptible impacts on the benthic communities present, which are already adapted to living with the disturbance in the navigation channel.

Comment SA4-26

<u>Dredging (Chapter 3.17)</u>

The Draft EIS discuss 2014 controlling depths, congressionally authorized 2014 project depths, and 2017 project depths for the Grays Harbor shipping channel. The 2017 project depths were the subject of a USACE General Investigation Feasibility Study in 2014 at the request of the Port of Grays Harbor. The Final EIS should clarify the connection between the 2017 projects depths and the proposed terminal expansion projects. If these actions are connected, then the impacts associated with dredging needed to achieve the 2017 project depths should be fully disclosed within the environmental analysis.

Response SA4-26

The proposed action is not a part of the Grays Harbor Navigation Improvement Project nor is it dependent on the implementation of this project in order to proceed; therefore, the projects are not considered connected actions. See the Master Response for Connected or Similar Actions for more information.

Comment SA4-27

<u>Water Quality (Chapter 3.3.4 & 3.5.5)</u>

The Imperium Expansion EIS discusses how stormwater is managed according to where within the project site rainfalls occurs. A portion of the stormwater discharges to the Port's MS4 system that is also covered under the Industrial Stormwater General Permit (ISGP). The stormwater BMPs in place are general in nature (e.g., an oil/water separator). If the facility is not able to meet ISGP

benchmarks additional stormwater treatment will be required. DNR recommends that the Final EIS discuss alternatives to construct a stormwater treatment BMP alongside the facility prior to construction rather than potentially waiting until after benchmarks have been exceeded and adverse impacts have occurred.

Response SA4-27

This comment is specific to the REG (formerly Imperium Terminal Services) Expansion Project and would be addressed in response to comments as part of the Final EIS for that project.

Comment SA4-28

The Draft EIS identifies the Fry Creek diversion channel as a fish bearing stream that supports Coho salmon, winter steelhead, and fall Chinook salmon. The Draft EIS does not discuss potential impacts to salmonids in Fry Creek other than with respect to noise result from pile driving. The Final EIS should discuss potential water quality impacts to Fry Creek as a result storm water runoff and potential releases of hazardous materials. The discussion of groundwater suggests that groundwater could be a mechanism for transporting contamination to Fry Creek.

Response SA4-28

Draft EIS Chapter 3, Section 3.3, *Water*, addresses potential contamination of surface waters and groundwater from construction activities. As stated in Section 3.3.5.2, *Proposed Action*, the potential for these water resource impacts would be reduced the site-specific stormwater pollution prevention plan for construction that includes BMPs for material handling and construction waste management. Final Section 3.5, *Animals*, clarifies that these measures would reduce impacts on aquatic habitat via groundwater as well as surface water.

Comment SA4-29

<u>Artificial Lighting (Chapter 3.5.5 & 3.9.5)</u>

Chapter 3.9.5 states that proposed night loading at Terminal 1 would require additional overwater lighting for an estimated 200 nights per year. The Final EIS should provide details on the type, location, and intensity of lighting and discuss potential impacts on the adjacent aquatic environment, including changes in species behavior, abundance, and predator-prey relationships. Mitigation measures should be proposed to minimize illumination of the aquatic environment.

Response SA4-29

As described in Draft EIS Chapter 3, Section 3.9.5, *Artificial Lighting*, additional lighting may be required at the dock for the hose tower and dock safety unit (a component of the marine vapor combustion unit) during vessel loading. Specific details on facility lighting would be determined during final project design and permitting; however, it is anticipated that lighting would be minimized due to costs and to adhere to code requirements and standards for a safe working environment. Moreover, lighting would likely be directed downward at the facility, as under existing conditions, and not to the water surface where it could affect the aquatic environment. Because the project site and Port of Grays Harbor are currently well lit and because new lighting would be kept to a minimum and directed at the facility, the potential impacts of the additive increase in lighting

for nighttime operations up to 119 nights per year on fish behavior and predator-prey relationships is not considered significant.

Comment SA4-30

Shorebirds (Chapter 4.7.1.3)

The Grays Harbor estuary is designated as a Western hemisphere Shorebird Reserve Network Site in recognition of the area's internationally-significant shorebird habitat. The Draft EIS proposes as mitigation to halt crude oil-vessel loading during two weeks of the peak spring shorebird migration. The Final EIS should discuss potential impacts to shorebird foraging in nearshore habitats as a result of increased vessel operations (e.g., noise and vessel wakes) outside of this window. Also, what are the population level impacts to shorebirds if a spill was to occur on either side of this two week window?

Response SA4-30

Draft EIS Chapter 3, Section 3.5, *Animals,* addresses the potential for impacts on animals in and around Grays Harbor associated with increased vessel traffic. As noted in Section 3.5, the increase of one additional tank vessel trip every other day would result in a small increase in activity compared to the no-action alternative. As noted in the discussion of impacts, increased noise and impacts from increase vessel wake would be minimal.

Draft EIS Chapter 4, *Environmental Health and Safety,* states that the analysis focuses on the relative risks for a set of release scenarios that could occur as the result of terminal operations and rail and vessel transport associated with the proposed action. Appendix M, *Risk Assessment Technical Report*, Appendix N, *Oil Spill Modeling*, do not predict precise spill sizes or locations where spills might occur. This approach provides decision-makers and planners with a range of potential outcomes related to the proposed action to help them understand potential risks and propose targeted mitigation measures. By extension, the Draft EIS does not predict the consequences that would affect individual resource areas or populations along rail and vessel transportation corridors with any one release scenario. Therefore, the Final EIS does not include a detailed evaluation of response capabilities or natural resource damages for any one potential outcome. Rather, as discussed in the Master Response for Environmental Health and Safety Analysis, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident occurs, including natural resource impacts.

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds as well as other species in the area, the Final EIS reflects revisions to clarify that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification.

Comment SA4-31

Regional Oil Transport

Rail Transit on BNSF Mainlines (Chapter 5.5.2)

Increasing crude oil transport from the Bakken formation in North Dakota to Centralia along the BNSF mainline in Washington state adjacent, over, and through state-owned lands poses a significant risk to DNR managed trust resources and state-owned aquatic lands. A number of recent crude-by-rail incidents throughout the United States highlight the risks associated with derailments, spills and explosions. The Draft EIS does not disclose the potential increased risk of (1) explosion and resulting wildfire from additional train traffic through adjacent forest and grasslands; and (2) potential oil spills into waters of the state. The Draft EIS states that risk of incident involving a major spill, fire, explosion or derailment is low based on the small increase in overall rail traffic due to the proposed action; however, this statement ignores the fact that crude-by-rail represents a higher environmental risk than cargo trains.

The Final EIS should clearly disclose the incremental growth in cumulative crude-by-rail transport within Washington State if the proposed projects are approved. It should analyze what types of sensitive resources are adjacent to the BNSF mainlines -especially along routes traversed by laden tank cars - and identify mitigation measures to reduce potential risk of incidents. It should also conduct a risk analysis outlining accident history along the BNSF mainlines, potential areas of increased risk along the track (e.g., landslide hazard areas), and maintenance needs similar to the analysis completed for the transport along the PS&P line between Centralia and Grays Harbor. Various spill scenarios should be analyzed to evaluate the range of potential adverse impacts to natural resources, including DNR managed trust resources and state-owned aquatic lands. Prior to the adoption of state regulations for contingency planning requirements pursuant to the Laws of 2014, Chapter 273, interim contingency planning requirements and minimum mitigation measures should be identified. DNR also requests additional information be disclosed about the current and projected levels of spill response capabilities- including trained personnel and equipment- along the routes proposed for crude oil transport throughout Washington State.

<u>Puget Sound Vessel Transit (Chapter 5.5.3 and 6.5.6)</u>

Increasing oil laden tank vessel transit within the Strait of Juan de Fuca and Puget Sound represents a significant risk to state-owned aquatic lands. It is unclear what percentage of vessels originating from the proposed facilities would transit to Puget Sound refineries. The Draft EIS states that the Westway and Imperium proposals could represent eight percent of overall tank vessel traffic in Puget Sound. What percentage of existing tank vessels calls involve transport of crude oil? The Final EIS should clarify the incremental increase in cumulative oil-by-vessel trips expected if the proposed projects are approved. The cumulative impacts analysis should also be expanded to analyze the projected growth, associated risks, and potential mitigation of vessel traffic in Puget Sound.

Response SA4-31

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about

the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

SA5, Washington State Department of Transportation, Megan White

Comment SA5-1

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Lynn Peterson Secretary of Transportation

October 20, 2015

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

RE: Westway Expansion and Imperium Terminal Services Expansion Projects Draft Environmental Impact Statement (EIS) Comments

Dear Co-Leads:

Thank you for providing the Washington State Department of Transportation (WSOOT) with the opportunity to comment on the Draft Environmental Impact Statements (EISs) for the Westway and Imperium Expansion Projects.

In general, our comments highlight that highway operational impacts along US 12 within the City of Aberdeen and along SR 507 in the City of Centralia are not adequately addressed in the documents. We also noticed a need to update information regarding planned and completed rail capacity enhancements. Please see our specific comments attached.

We look forward to working with Ecology and the City of Hoquiam, the SEPA co-lead agencies, in addressing our comments in the Final EISs. Please contact me at (360) 705-7480 if you have any questions or would like to discuss any of these comments.

Sincerely,

Megan White, P.E., Director
Environmental Services Office

MW:eg

Attachment: WSDOT comments

Chapter & Section, Page: Chapter 3.16.3.2, pg 3.16-5 Reviewer: Ahmer Nizam Comment: In the section titled 'Vehicle Queuing' - It is not clear if the evaluation accounted for RR traffic signal interconnection at appropriate intersections. Perhaps none of the adjacent intersections have signal Interconnections? Please clarify.

Response SA5-1

Traffic signal timing data were obtained for US 12/Tyler Street and US 12/Chehalis Street to conduct the vehicle traffic analysis. Both traffic signals operate without interconnection to the adjacent rail line.

Comment SA5-2

Chapter & Section, Page: Chapter 3.16.7.1, pg 3.16-27 Reviewer: Ahmer Nizam Comment: The first sentence under the first bullet in the section on 'Applicant Mitigation' should mention the need to work with the City of Centralia (in addition to the other-entities listed) to address vehicle delay etc.

Response SA5-2

The proposed mitigation measure does not include working with the City of Centralia because it is specifically intended to address vehicle delay between the project site and Poynor Yard.

Comment SA5-3

Chapter & Section, Page: Chapter 3.16.7.2, pg 3.16-28 Reviewer: Ahmer Nizam Comment: 3rd bullet—Please consider replacing the word 'warranted' with something like “recommended by the railroad and jurisdictional authorities”.

Response SA5-3

The installation of railroad crossing treatments follows guidance in the Federal Highway Administration *Railroad-Highway Grade Crossing Handbook*,[7] which uses the word *warrant* to describe the evaluation process of potential treatments. However, Final EIS Chapter 3, Section 3.16.7.2, *Other Measures to Be Considered*, has been revised per the commenter’s suggestion to better clarify the process.

[7] Federal Highway Administration. 2007. *Railroad-Highway Grade Crossing Handbook*. August. Available: http://safety.fhwa.dot.gov/xings/com_roaduser/07010/.

Comment SA5-4

Chapter & Section, Page: Chapter 3.16.8, pg 3.16-29 Reviewer: Ahmer Nizam Comment: 3rd bullet on RR infrastructure improvements—Does the statement 'Vehicle delay could be reduced by adding new railroad infrastructure on the PS&P rail line.' include addressing current speed restrictions?

Response SA5-4

The Draft EIS does not assess revising current speed restrictions as a potential strategy to reduce vehicle delay.

Comment SA5-5

Chapter & Section, Page: Chapter 3.16 Reviewer: Southwest Region Traffic Comment: The potential safety issues with traffic volumes in the PM peak need to be more fully evaluated due to the length of the unit trains and their operating speed in Centralia on SR 507.

Response SA5-5

As shown in Draft EIS Table 3.16-6, the SR 507 rail crossings (at Tower Street and Pearl Street) during the PM peak hour would operate at level of service (LOS) F under the no-action alternative and continue to operate at LOS F under the proposed action. Table 3.16-7 shows that the average vehicle queue lengths at the SR 507 rail crossings would increase by one to two vehicles (20 to 40 feet) as a result of a proposed action train pass-by during the PM peak, so the potential impact of long vehicle queues during PM peak on vehicle safety due to the proposed action would be small. This is because PS&P already moves long grain and auto trains across the Tower Street and Pearl Street crossings.

Comment SA5-6

Chapter & Section, Page: Chapter 5.5.1.1, pg 5-25 Reviewer: Jason Beloso Comment: 1st paragraph under Planned Capacity Enhancements: Request clarification of referenced projects in context to capacity enhancements. While there are certainly freight rail benefits, WSDOT Rail Division projects are being implemented with the premise of improving reliability and on time performance for passenger rail. Also, the amount and location of capacity enhancement projects (entire BNSF main line vs. adjacent to study area), including project implementation status (many of the projects have moved beyond the environmental review process) should be clarified or corrected.

Chapter & Section, Page: Chapter 5.5.1.1, pg 5-25 Reviewer: Chris Herman Comment: 2nd paragraph under Planned Capacity Enhancements: Blakeslee Junction project - This project, previously documented in the 2008 Marine Cargo Forecast, was designed to make modest improvements to the existing rail infrastructure at Blakeslee Junction (Centralia) in order to allow for the addition of an extra lane of traffic in each direction on I-5. These improvements are completed and no current plans exist to make any additional rail improvements as a part of this project.

Response SA5-6

The planned capacity enhancements discussed in Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and resulting impacts on BNSF main lines in Washington State, Planned Capacity

Enhancements, are based on the Washington State Rail Plan.[8] Final EIS Section 5.4.2, *Rail*, has been revised to indicate that although these projects are designed to improve reliability and on-time performance for passenger rail, they would have benefits for freight rail traffic as well. The section also reflects updates to the status of the projects and removal of those that have been completed.

Comment SA5-7

Chapter & Section, Page: Appendix L, pg L-17 Reviewer: Olympic Region Traffic Comment: Eastbound right turners (into the mall) would be expected to back up on US 12. Where is the analysis that shows expected queue on US 12? What about Level Of Service? What is the mitigation for this?

Response SA5-7

As stated in Draft EIS Appendix L, *Vehicle Traffic Analysis*, page L1-17, queuing was analyzed at for westbound and eastbound vehicles on US Route 12 turning into the Olympic Gateway Plaza at Tyler Street, Chehalis Street, and Newell Street. Table L-8 shows the available and estimated queue length at these locations. As noted, queue lengths under the proposed action compared to those anticipated under the no-action alternative (Tables L4 and L-5) show relatively small increases (a few vehicles). Therefore, the Draft EIS does not evaluate level of service for US Route 12 and no additional mitigation is proposed.

SA6, Washington State Parks and Recreation Commission, Randy Kline

Comment SA6-1

Don Hoch
Director

State of Washington
Washington State Parks and Recreation Commission
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VIA EMAIL

November 16, 2015

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

[8] Washington State Department of Transportation. 2014. *Washington State Rail Plan, Integrated Freight and Passenger Rail Plan*, 2013-2015. Rail Division. March.

Re: Comments on the Draft Environmental Impact Statements (EISs) for the Westway Expansion Project and the Imperium Terminal Services Expansion Project

Dear Project Manager,

Thank you for the opportunity to provide Draft Environmental Impact Statement (EIS) comments for the proposed Westway and Imperium expansion projects. The Washington State Parks and Recreation Commission (Commission) manages a diverse system of over 100 parks located throughout the state. Growth in population and the popularity of outdoor recreation have increased pressure on the agency to provide more recreational opportunities while continuing to preserve the unique natural and cultural resources under its management. The Commission is concerned that the proposed project and associated rail traffic may have the potential to negatively impact State Park users.

State Parks appreciates that the co-lead agencies have included "Recreation" as an area for analysis in the EIS. To adequately determine potential impacts, State Parks requests that each State Park located within 1000 feet from the Puget Sound & Pacific Railroad railway line should be evaluated for the following potential impacts to recreation:

- The potential impact of noise due to increased frequency of railroad operations on the day-use, overnight recreating public camping in tents, trailers or RVs, and park employees in close proximity to the rail spur and BNSF railway;
- The potential for vibration from increased train traffic to impact cultural and historic park resources;
- Consideration of the timing of rail operations that may run through or are in close proximity to camping parks to align with State Parks quiet hour restrictions which are from 10:00 pm to 6:30 am;
- Consideration of sharing and making readily available rail transport schedules so that state park visitors in close proximity to rail traffic can be apprised of dates when heavy rail traffic is anticipated.

Thank you for the opportunity to provide comment. If you have any questions I can be reached at 360.902.8632 or randy.kline@parks.wa.gov.

Sincerely,

Randy Kline, Environmental Program Manager

CC via email: File

Randy Kline, Environmental Program Manager
Washington State Parks and Recreation Commission
1111 Israel Road SW, Tumwater, WA 98501
Phone: 360.902.8632
randy.kline@parks.wa.gov
www.parks.state.wa.us

Response SA6-1

Draft EIS Chapter 3, Section 3.10, *Recreation*, describes recreational uses and areas in the study area, including parks and natural areas, fishing, bird watching, and whale watching. The study area for recreation consists of recreational uses and areas near the project site that could be affected by construction and routine operation at the project site and areas that could be affected during routine rail transport along the PS&P rail line and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor. Draft EIS Table 3.10-2 identifies state parks along the PS&P rail line. The closest state park to the PS&P rail line is Lake Sylvia State Park, located north of Montesano. This state park is approximately 1 mile from the PS&P rail line at its closest point. Therefore, no state parks within 1,000 feet of the PS&P rail line have been identified. For a description of the of rail transport along mainline routes beyond Centralia and vessel transport along commercial vessel routes off the Washington coast, refer to Chapter 5, *Extended Rail and Vessel Transport*.

SA7, Washington Utilities and Transportation Commission, Steve King

Comment SA7-1

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November 30, 2015

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

Diane Butorac, Regional Planner
Southwest Regional Office
Department of Ecology
P.O. Box 47775
Olympia, Washington 98504-7775

Sent via Email and First Class Mail

Subject: Commission Comments on Westway and Imperium Draft Environmental Impact Statements

Dear Ms. Butorac and ICF International:

The Utilities and Transportation Commission (commission) appreciates the opportunity to comment on the Draft Environmental Impact Statements (DEISs or Draft Statements) for the proposed Westway and Imperium projects in Grays Harbor County, Washington. The projects would

significantly expand the storage capacity for crude oil at adjacent facilities at the Port of Grays Harbor, and increase transportation of volatile Bakken crude oil by rail from the Midwestern United States to Grays Harbor. Oil would be shipped to the facility by Puget Sound and Pacific Railroad (PS&P).

The commission has responsibility under state law for regulating the safety of more than 2,800 public railroad crossings in Washington State and private crossings located on rail routes that carry crude oil tanker cars. Among other things, the commission inspects the surface conditions of railroad crossings and establishes clearances over and beside railroad tracks. The commission also reviews railroads' intent to increase train speeds, construct new crossings and alter or close existing crossings. The commission partners with the U.S. Department of Transportation Federal Railroad Administration (FRA) and employs staff who perform inspections in hazardous materials, signal and train control, track conditions, operating practices, and motive power and equipment in support of FRA's regulatory and inspection program.

Bridges

The commission has concerns about the load capacity of bridges on the PS&P line between Centralia and the project sites. These concerns are shared by many members of the public, as evidenced by the comments made in response to the initial proposal for both Westway and Imperium. The Draft Statements of both the Westway and Imperium project proposals provide very brief and general descriptions of the 52 bridges on this line (see pages 3.15-10), and equally brief reference to a future maintenance project to upgrade three steel bridges (see pages 3.15-13). This lack of detail is insufficient to determine whether the infrastructure can safely accommodate the increased loads envisioned in the proposed projects.

The FRA regulates bridge safety standards under 49 Code of Federal Regulations (CFR) Part 237. The CFR requires each track owner to have a “bridge management program” in place (Subpart B - 237.31) with specific criteria, including an accurate inventory of bridges, [Footnote 1: The inventory must include a unique identifier for each bridge, its location, configuration, type of construction, number of spans, and span lengths.] information about safe load capacity, and specific program for bridge inspections (237.33). Each bridge management program must include scheduling inspections by a qualified inspector once per calendar year for each bridge in railroad service (237.101). In addition, each track owner is required to keep bridge inspection records (237.109).

Recommendations:

- Require PS&P to:
  - Make inventory and inspection records available to the public process for all 52 bridges.
  - Demonstrate that a qualified inspector has verified that all 52 bridges have the load capacity to safely handle a unit train of 120 loaded tank cars.
  - Describe its bridge inspection program that includes annual inspections by a qualified inspector.
  - Describe in detail which bridges are scheduled for upgrade, the nature of the upgrade and approximate start date and completion date.

Response SA7-1

These actions have been added to Final EIS, Chapter 4, Section 4.5.3.3, *Other Measures to be Considered*.

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment SA7-2

Private Crossing Safety

The Draft Statements do not adequately address safety at private railroad crossings between Centralia and the project sites. While both Draft Statements state that they analyzed private crossings using the FRA general accident prediction formula (see page L-5), in fact the various lists of the 81 crossings identified between Centralia and the project sites include only a handful of private crossings. Many private crossings between Centralia and the Port of Grays Harbor that appear on the FRA crossing inventory do not appear anywhere in the Draft Statements.

House Bill 1449, which became effective July l, 2015, gave the commission limited authority over private crossings on crude oil transportation routes. The commission is currently promulgating rules establishing minimum standards for signs at all private grade crossings on crude oil routes and a process for ordering additional signage or other safety measures at private crossings with restricted sight distances or other safety deficiencies.

Recommendations:

- Require PS&P to provide an accurate list of all private crossings along the route between Centralia and the Port of Grays Harbor.
- Require PS&P to be required to comply with the new rules before transporting crude oil over the Centralia to Port of Grays Harbor route.

Response SA7-2

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety,* analyzes public and select private crossings throughout the study area. As discussed in Appendix L, *Vehicle Traffic Analysis,* the impacts on most public crossings would be low. Impacts on private crossings would be lower still because traffic volumes are normally substantially lower at private crossings. Section 3.16 analyzes select private crossings that were identified by Washington State Department of Transportation as potential areas of concern due to higher traffic volumes than are typical for private crossings (i.e., the entrance to the port area). Subsequent to release of the Draft EIS, the Washington Utilities and

Transportation Commission amended and adopted rules establishing safety standards at private crossings (WAC 480-62-270). These rules became effective March 11, 2016. Final EIS Table 3.15-1, Laws and Regulations for Rail Traffic, has been revised to refer to the requirements of the new rules. Final EIS Appendix B, *Laws and Regulations*, Section B.2.33, *Washington Utilities and Transportation Commission*, has also been revised with a more comprehensive description of the new rules. It is assumed that PS&P will comply with the new rules, similar to compliance with other applicable rules and regulations, and Section 3.16.7.2, *Other Measures to be Considered,* has not been revised.

Comment SA7-3

Public Crossing Safety

The Westway (see pages 3.16-27, 3.16-28 and L-5) and Imperium (see 3.16-27, 3.16-29 and LS) Draft Statements both purport to address public rail crossing safety, but as discussed below fail to address 17 public crossings identified by the commission as "at-risk crossings." The Draft Statements must address more fully how the companies intend to address safety at these crossings.

The Draft Statements state on page L-5 that the companies have analyzed public grade crossings using the FRA GradeDEC.Net modelling software. This is an accident prediction software sponsored by the FRA that is used nationwide by railroad safety specialists; including the commission. However, the GradeDEC.Net model has its limitations and is useful as only one tool of many.

First, the underlying data used by the model comes from the FRA's crossing inventory and cannot be changed in the computer modeling. If data element in the FRA inventory is incorrect, which happens frequently, it cannot be changed in the model, and the only option is to recalculate the results using the general accident prediction formula. The general accident prediction formula is a complex, manual calculation using a myriad of data elements. The chance for misinterpretation or error is high.

Second, the GradeDEC.Net model captures only the most basic of data elements and produces a very basic result. For instance, the model captures such things as accident history, train and traffic volumes, level of protection, and number of roadway lanes, but does not capture other site specific characteristics such as the angle of the crossing, train and vehicle speeds, and sight distances.

The use of the GradeDEC.Net (and manual calculation using the general accident prediction formula when necessary) has produced some good, but very basic and very preliminary results in the Draft Statements. However, the Draft Statements err in assuming that these results are determinative in deciding whether additional safety devices are necessary at the 81 grade crossings between Centralia and the project sites.

The Draft Statements state on page 3.16-27:

> *The Railroad-Highway Grade Crossing Handbook- Revised Second Edition* (Federal Highway Administration 2007) indicates that active devices with automatic gates should be considered when certain criteria are met. One criterion is if the expected accident frequency, as calculated by the U.S. Department of Transportation Accident Prediction formula, exceeds 0.075. As shown in Appendix L, *Vehicle Traffic Analysis,* no grade crossings would exceed this frequency using the formula. Therefore, using this threshold, no crossings under the no-action alternative would require consideration of automatic gates.

While this statement about this one criterion is true, this particular criterion is just *one of 19* to be considered when determining whether active warning devices are necessary at a particular

crossing. Other criteria (e.g., inadequate sight distance in at least one quadrant, a crossing angle of less than 60 percent, and the presence of a highway intersection less than 75 feet from the crossing) are not discussed.

Based on the USDOT Federal Highway Administration (FHWA) publication *Guidance on Traffic Control Devices at Highway-Rail Grade Crossings,* published November 2002, the commission has identified 17 crossings that require further study and field analysis before any crude oil is transported over this line.

These 17 are crossings with a combination of passive protection and flashing lights only (i.e., they have no gates). Some of these crossings are listed in both the Westway and Imperium Draft Statements (see page L-11, Table L-6, identified as "Grade Crossing Infrastructure Projects Planned but Not Funded - No-Action Alternative (2017 and 2037)." [Footnote 2: Two crossings, Tower Street and Pearl Street, should be removed from Table L-6. These crossings were recently upgraded as part of WSDOT's Section 130 program.]

The 17 crossings are:

	USDOT #	COUNTY	ROAD	ANGLE <60%		# OF TRACKS	LIMITED	PROTECTION
1	092577M	Thurston	Moon Rd SW		X	2	X	Passive. No lights. No stop or yield signs.
2	092583R	Grays Harbor	Blockhouse Rd			1	X	Passive with stop signs.
3	092595K	Grays Harbor	Elma-Gate Rd W	0-29		2	X	Passive with stop signs.
4	096510U	Grays Harbor	Dunlap Rd	30-59	X	1	X	Passive with stop signs.
5	096515D	Grays Harbor	Blockhouse Rd N	30-59		1	X	Passive with stop signs.
6	096518Y	Grays Harbor	Blockhouse Rd N	30-59		1	X	Passive with stop signs.
7	096525J	Grays Harbor	N 2nd St			2	X	Passive with stop signs.
8	096638P	Grays Harbor	N 10th St			1	X	Passive with stop signs.
9	096641X	Grays Harbor	N 17th St-Baily			1	X	Passive with stop signs.
10	096642E	Grays Harbor	Calder Rd			1	X	Passive with stop signs.
11	096649C	Grays Harbor	Hewitt Street		X	1	X	Passive with stop signs.
12	096657U	Grays Harbor	Glenn Rd		X	1	X	Passive with stop signs.
13	096659H	Grays Harbor	Beacon Rd	30-59		1	X	Lights only.

14	096677F	Grays Harbor	County Farm Rd			1	X	Passive with stop signs.
15	096678M	Grays Harbor	Devonshire Rd	30-59		1	X	Lights only.
16	096679U	Grays Harbor	Heikkinen Road			1	X	Passive with stop signs.
17	096682C	Grays Harbor	Central Park Dr			1	X	Lights only.

The Westway DEIS at page 3.16-28 and the Imperium DEIS at 3.16-29 describe "Other Measures to be Considered" to mitigate hazards at railroad crossings on the line. Bullet #3 for both reads:

To reduce the risk of an accident at grade crossings, PS&P should install flashers, gates, and/or cantilevers at crossings where warranted to improve vehicle and rail safety conditions. Begin to install these upgrades before initiating oil train traffic.

In our view, this measure is insufficiently precise and should be clarified.

Recommendation:

- Move this measure in both Draft Statements to Section 3.16.7. 1, Applicant Mitigation, and changed to the following:
  - To mitigate the risk of an accident at the 17 grade crossings identified by the commission as at-risk crossings, PS&P will conduct on-site diagnostic reviews with commission staff and representatives of the affected road authority (city or county). PS&P will implement the recommendation s of the diagnostic team, which may include installation of flashers, gates, and/or cantilevers, and other crossing safety upgrades on a timeline recommended by the diagnostic team. Some grade crossing upgrades and installations may be required prior to PS&P initiating oil train traffic and the applicant(s) will be solely responsible for funding these projects.

Response SA7-3

The intent of the analysis in the Draft EIS is to provide information about the relative change in risks related to the proposed action. Consistent with this approach, general consideration was given to the 17 intersections listed in the comment. As noted, while the Federal Railroad Administration's GradeDec.Net model has some limitations, it was deemed sufficient for the purposes of this analysis. Draft EIS Appendix L, *Vehicle Traffic Analysis,* page L-5, describes the GradeDec.Net model used to evaluate potential proposed action-related changes to safety at selected grade crossings. Model inputs were adjusted to use more accurate vehicle traffic data, where available, from the Washington State Department of Transportation or local jurisdictions and to include the increased rail traffic anticipated as a result of the proposed action. The Draft EIS determines that impacts on vehicle safety due to the increase in rail traffic under the proposed action would be minimal.

Final EIS Appendix L, *Vehicle Traffic Analysis,* Table L-6 has been revised to eliminate Tower Street and Pearl Street in the analysis.

Comment SA7-4

Emergency Notification Signs (ENS)

The Westway (at pages 3.16-28, S-46, S-63) and Imperium (at pages 3.16-29, S-47, S-65) Draft Statements address ENS issues within the sections titled "Applicant Mitigation" and "What are the applicant measures that would address these impacts." Both Draft Statements state:

> To address potential vehicle safety impacts each of the public at-grade crossings on the rail line, the applicant will work with PS&P to provide permanent signs that prominently display both a toll-free telephone number and a unique grade-crossing identification number in compliance with Federal Highway Administration regulations (23 Code of Federal Regulations 655). The toll-free number would enable drivers to promptly report any accidents, malfunctioning warning devices, stalled vehicles, or other dangerous conditions. The signs will be in place prior to the beginning of operations involving transport of crude oil.

This language is unnecessary. These measures are already mandated by federal regulation, which required PS&P to install such signage by Sept. 1, 2015. If the railroad has not yet installed the required signage, the commission will address this as a compliance issue before any oil is transported on this line.

Recommendations:

- Do not include language related to these signs in the final EIS.

Stop and Yield Signs

The Westway (at page 3.16-28) and Imperium (at 3.16-29) Draft Statements both address Stop and Yield signs within the section titled "Other Measures to Be Considered." The Draft Statements state:

> To reduce the risk of an accident on the PS&P line, PS&P should work with local jurisdiction including WSDOT and the Washington Utilities and Transportation Commission to ensure all of the public grade crossings meet Manual on Uniform Traffic Control Devices (23 U.S.C. 109(d) guidance to include a yield or stop sign on every cross-buck post.

The commission will assist PS&P in assessing its public crossings for Manual on Uniform Traffic Control Devices (MUTCD) compliance and in installing Yield signs at appropriate crossings. Installation of a Stop sign at a crossing currently protected only by cross bucks requires an engineering study at PS&P's expense (MUTCD 8B.04 Standard 05). Commission staff fully expects to be invited by PS&P to participate in a corridor study of every grade crossing on the line to make determinations on MUTCD compliance as well as any other safety related issue.

Response SA7-4

Final EIS Chapter 3, Section 3.16.7.1, *Applicant Mitigation*, has been revised to remove the mitigation measure related to emergency notification signs. Final EIS Chapter 3, Section 3.16.4.2, *Vehicle Safety*, has been revised to add PS&P's protocols related to emergency notification signs.

Comment SA7-5

Track Issues

The Westway (at page 3.15-11) and Imperium (at page 3.15-11) Draft Statements both address track issues within the section titled "Federal Railroad Administration Class of Track and Speeds," bullet number four. Both state:

For about 1,000 feet at a point about 4 miles west of Montesano, the speed limit is 10 mph. The track is on the bank of the Chehalis River. The soil condition is such that maintenance to the tolerance required for 25 mph speed limit is difficult.

The integrity of the track, ballast, sub-ballast and subgrade are critical to the safe transportation of the train over the rail line. The commission is very concerned that PS&P experienced three derailments on this line in 2014 due in large part to poor soil conditions.

Recommendation:

- Require PS&P to address the underlying soil issues before it transports volatile Bakken crude oil, regardless of the speed at which the trains travel. Any derailment involving crude oil is potentially disastrous in terms of human injury or death, and extensive property and environmental damage.

Response SA7-5

As above, Draft EIS Section 3.15.4.5, *Ongoing Maintenance and Inspections*, Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Refer to the Master Response for Mitigation Framework for more information about the development and enforcement of mitigation under SEPA.

Comment SA7-6

Blocked Crossings

The commission has significant concerns about blocked crossings from the cumulative effect of both the Westway and Imperium proposals. The Draft Statements indicate that PS&P will be blocking public crossings at both the Centralia interchange location and in the city of Aberdeen. Recent court decisions have determined that state rules addressing blocked crossings, such as the commission rule at Washington Administrative Code (WAC) 480-62-220, [Footnote 3: The Commission rule would prohibit blocking a public crossing for more than 10 minutes and define a blocked crossing as a crossing where a train sits without moving for 10 minutes or more.] are preempted by federal law and therefore unenforceable.

Blocked crossings pose both an inconvenience to the public and a safety hazard as motorists and pedestrians make unsafe moves to avoid becoming trapped by a stationary train. Where trains blocking the crossing include tank cars containing volatile crude oil, the safety concerns are heightened due to the higher risk of damage or injury in the event of an accident, collision, or terrorist act. The commission has no jurisdiction over blocked public grade crossings, but commission staff will continue to work actively with railroads when blocked crossings are reported.

Response SA7-6

Draft EIS Chapter 6, Sections 6.5.4, *Rail Traffic,* 6.5.5, *Vehicle Traffic and Safety,* and 6.5.7, *Environmental Health and Safety* discuss the cumulative impacts of the proposed action, REG

(formerly Imperium Terminal Services) Expansion Project, and Grays Harbor Rail Terminal Project on rail traffic, vehicle traffic and safety, and environmental health and safety.

Comment SA7-7

Switching Operations

The Draft Statements address switching operations on pages 3.15-23 and 3.15-24. According to the Imperium DEIS, it appears that PS&P is planning switching operations that will occupy public crossings longer than other feasible switching movements. Its DEIS states that although other switching movements may block the crossings for a shorter period, they are not the "most time-efficient and cost-efficient."

Choosing to inconvenience businesses and citizens and create unnecessary safety problems related to blocked public crossings because it is more "time-efficient and cost-efficient" to the railroad is not acceptable.

The Westway Draft Statement raises similar concerns. Under its proposal, 120-car trains will be brought into the city of Aberdeen to a small PS&P yard. Because the Westway facility can only receive 20 cars at a time, PS&P will conduct a switching operation at the yard that breaks the train into six 20-car trains. This means significant longer times for switching operations, which will block crossings for excessively long periods of time both east and west of the yard, during which time no vehicles will be able to cross the tracks.

The Westway (at page 3.16-27) and Imperium (at page 3.16.28) Draft Statements address mitigation of these problems under the sections entitled "Applicant Mitigation." The Draft Statements propose mitigation by tasking various entities, including the cities of Hoquiam and Aberdeen, Port of Grays Harbor, Grays Harbor Council of Governments, and PS&P, with addressing solutions to the vehicle delay that the proposed switching operations will cause.

While the commission has no jurisdiction over public crossings within Aberdeen city limits, it does have experience and expertise in switching operations in other locations across the state. Compared to switching operations elsewhere in Washington, the commission finds the proposal here to be ill conceived, poorly designed, and unworkable. It is unfair and unsafe to businesses and patron s in the Olympic Gateway Plaza as well as the general public and affected businesses west of Poynor Yard.

The applicants are required to ensure acceptable mitigation measures are in place prior to beginning project operations. The Westway (at page S-34) and Imperium (at page S-35) Draft Statements describe under the heading "Vehicle Traffic and Safety" the crossing blocking problem at the Olympic Gateway Plaza and Port areas of Aberdeen as "unavoidable and significant adverse impacts." They go on to say that mitigation plans and infrastructure improvements would reduce the impacts but not completely eliminate them. The commission strongly disagrees. Every other railroad company in Washington has figured out how to conduct its switching operations without blocking public crossings. While such solutions are likely to be more expensive than the companies would like, it should be the responsibility of the applicants, the port, and PS&P to solve this problem to the satisfaction of the city of Aberdeen, its businesses, and its citizens before any oil moves to the project sites.

Recommendation:

- Require the applicants, the Port, and PS&P to solve this problem to the satisfaction of the city of Aberdeen, its businesses, and its citizens before any oil moves to the project sites.

Response SA7-7

Draft EIS Section 3.16, *Vehicle Traffic and Safety*, provides a discussion of the potential vehicle delay impacts at Olympic Gateway Plaza. As noted in PS&P's comments on the Draft EIS and in revisions to Final EIS Section 3.15, *Rail Traffic*, there are various ways that trains may be assembled and tested prior to departure that could result in greater or lesser impacts specific to the proposed action. The analysis in the Draft EIS is based on the best available information and provides a representative estimate of blocked crossing times based on those assumptions. Section 3.16.7.1, *Applicant Measures*, requires the applicant to work with PS&P and other stakeholders to minimize the impacts of rail operations related to the proposed action in the Olympic Gateway Plaza area and between Poynor Yard and the project site. As suggested, this could include changes in operating procedures implemented by PS&P. The stakeholders identified in that process include local public agencies with responsibility to represent the best interest of the local community.

Additionally, Draft EIS Section 3.16.7.2, *Other Measures to be Considered,* recommends continued coordination between stakeholders to improve existing congestion and delay, access, and safety issues along US 12 and at the Olympic Gateway Plaza. The Grays Harbor Council of Governments in partnership with the Port of Grays Harbor and the City of Aberdeen initiated the East Aberdeen Mobility Project in late 2013 with funding from the federal Surface Transportation Program. This project analyzed options for easing congestion and improving safety along US 12, and facilitating access to businesses in and around Olympic Gateway Plaza. The final report[9] recommends conceptual design alternative C, Chehalis Street Overcrossing, as the highest-rank design concept based on public feedback. This roadway design concept incorporates a two-lane roadway bridge with bike lanes and a sidewalk over US 12 and the PS&P rail line. The north bridge approach is located near Chehalis Street and the south bridge approach touches down inside Olympic Gateway Plaza.

Refer to Master Responses for Mitigation Framework for more information about the development and enforcement of mitigation under SEPA.

Comment SA7-8

Financial Responsibility

In reviewing the two DEISs, one of the more glaring omissions is the ability of the parties involved to pay for any costs associated with an accident, spill, or explosion. There is no federal requirement detailing financial responsibility outside of limited liability insurance ranging from $50 million to 250 million and railroad companies are not required to report or verify how much insurance they carry. Absent a dedicated clean-up fund established by the railroad, any damage from a spill or accident would likely be borne by the state. There needs to be dedicated funds available to pay for the damage resulting from an oil spill and the cost of clean-up.

[9] Grays Harbor Council of Governments. 2015. *East Aberdeen Mobility Project. Preferred Alternative Selection.* April. Prepared by David Evans and Associates, Inc. Available: http://www.ghcog.org/Transportation/EastAberdeenMobility2014/East%20Aberdeen%20Alt%20Study_Final%20-%20Report%20and%20Cover%20minus%20Appendix.pdf. Accessed: May 3, 2016.

Currently, Class I railroads submit to the commission annual reports that contain the state portion of reports they file annually with the Surface Transportation Board (STB). The STB has authority to collect financial data, limited by statute to that necessary for the economic oversight of the regulated industry. Class II and III railroads do not have the same accounting or reporting requirements, but do file annual reports with the UTC. Neither the federal or state reports state address whether PS&P has the financial means to address a spill or accident involving a volatile product like Bakken crude oil.

Recommendation:

- Require PS&P to show financial responsibility in the event of a worst case spill or accident.

Thank you for the opportunity to comment on the Draft Statements for the proposed Westway and Imperium projects in Grays Harbor County. Please contact Jason Lewis, Transportation Policy Advisor, at 360-664-1206 or jlewis@ute.wa.gov for additional information.

Sincerely,

Steven V. King
Executive Director and Secretary

Response SA7-8

RCW 81.04.560 requires railroad companies to provide financial assurance of their ability to pay damages in the event of a spill or accident involving crude oil transportation in Washington State. The Washington Utilities and Transportation Commission administers this requirement and recently approved regulations that require rail operators transporting crude oil in Washington to provide annual information sufficient to demonstrate the railroad company's ability to pay the cost to clean up a reasonable worst-case spill of oil (WAC 480-62-300).[10] Final EIS Appendix B, *Laws and Regulations*, Section B.2.33, *Washington Utilities and Transportation Commission*, has been revised to show the requirements of the new rules. Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

[10] Washington Utilities and Transportation Commission. 2016. *Rail Safety Rulemaking.* Docket TR-151079. March 11. Available: http://www.utc.wa.gov/docs/Pages/RailSafetyRulemaking151079.aspx. Accessed: May 3, 2016.

3.3 Regional and Local Agencies

The regional and local agencies listed in Table 3-3 submitted comments on the Draft EIS. These comments and responses to those comments are presented after the table. Master responses were developed to address commonly raised comments and are presented in Chapter 2, *Comment Themes and Master Responses*.

The responses refer to the Draft EIS unless information has been revised, in which case the Final EIS is specified.

Table 3-3. Comment Letters Submitted by Regional and Local Agencies

Number	Agency
RLA-1	Aberdeen Fire Department, Tom Hubbard
RLA-2	Board of Thurston County Commissioners, Sandra Romero
RLA-3	City of Ocean Shores, Crystal Dingler
RLA-4	City of Olympia, Stephen Buxbaum
RLA-5	City of Washougal, David Scott
RLA-6	Grays Harbor County Water District #2, Reg Hearn
RLA-7	Jefferson County Board of Commissioners, Tami Pokorny
RLA-8	Marysville Fire District, Martin McFalls
RLA-9	Port of Grays Harbor, Gary G. Nelson
RLA-10	Port of Olympia, George Barner, Jr.
RLA-11	Skamania County Fire District #4, Timothy Young

RLA1, Aberdeen Fire Department, Tom Hubbard

Comment RLA1-1

City of Aberdeen Fire Department
Tom Hubbard, Fire Chief
Rich Malizia, Assistant Chief

October 14, 2015

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

To Whom It May Concern,

The purpose of this letter is to provide comment on the Draft Environmental Impact Statements for the proposed Westway and Imperium Expansion Projects in Grays Harbor County, and specifically the City of Aberdeen.

The Aberdeen Fire Department would like to provide input on four areas addressed within the EIS documents.

1. Response and mitigation of spills,
2. Response and mitigation of fire or explosions associated with crude oil or Methanol,
3. Emergency vehicle access to areas impacted by the PSAP rail line with specific reference to the East Aberdeen Gateway Mall area, the commercial area adjacent to the Poyner Switching Yard, and the commercial occupancies within the boundaries of the Port of Grays Harbor, and
4. Marine terminal shore side firefighting response capabilities.

Agency Background

The Aberdeen Fire Department is rated a Class 5 fire protection organization by the Washington State Survey and Ratings bureau. The department has a minimum daily staffing of eight personnel operating out of two stations, one located at 700 W. Market St. and the South Aberdeen Station located at 700 W. Curtis St. Operationally, the department consists of 33 line personnel, 1 Fire Chief, and 1 Assistant Chief who also serves as the Fire Marshal.

The department provides Advanced Life Support Emergency Medical response and transport (90% of total call volume) and fire suppression and light rescue (10% of total call volume). In 2014 the department responded to 4,593 emergency medical calls and 453 fire service calls. Our operational response to a fire or HAZMAT incident includes 1 Command Unit with 1 Battalion Chief, 1 Ladder Truck with 2 personnel, 1 Fire Engine with 3 personnel, and 1 ambulance with 2 personnel. On escalating incidents the Fire Chief and Assistant Chief respond as well as the call back of off duty personnel using predetermined alarm escalations. Aberdeen Fire Department personnel are trained to the HAZMAT Operations level.

Response RLA1-1

Final EIS Chapter 4, Section 4.4.1.3, *Response*, reflects the addition of information describing the location, staffing, and response capabilities of the Aberdeen Fire Department. The section also reflects the addition of information related to the Hoquiam Fire Department and other local responders.

Comment RLA1-2

1. Response and Mitigation of Spills

The Aberdeen Fire Department has limited spill response materials at its disposal. We are not equipped to effectively mitigate spills above fuel volumes found in typical passenger vehicles.

According to the Westway Expansion Project, Volume 1, Chapter 4, pages 4.5-7 to 4.5-8, the following actions are to be taken in the event of a product spill:

Typical actions for responding to a spill from a crude oil train derailment (if there is no fire) are as fallows. Similar actions would be taken for all products proposed to be transported.

- *Implement emergency response plan required under federal law. This includes notifications and initial actions for incidents.*
- *Protect public health and safety.*

- *Contact railroad emergency contact.*
- *Contact shipper (owner of the oil) using the shipping papers, railroad emergency contact, or CHEMTREC.*
- *Conduct hazard assessment and risk evaluation*
- *Conduct continuous air monitoring, as appropriate.*
- *Confine the spill.*
- *Apply foam for vapor suppression, if available.*
- *Isolate or evacuate based on recommendations in the product-based emergency response guide (for example, Guide No. 128 for petroleum crude oil recommends initial downwind evacuation for at least 1,000 feet). For first responders from the local jurisdictions or the railroad emergency response team, the posture for an oil or hazardous material spill on the rail is the same-defensive and protective. For local responders will do what is necessary to evaluate and report on the situation, keep themselves and the public safe, and monitor response and cleanup operations for compliance with local ordinances and permits. (Westway Expansion Project Volume 1 Chapter 4, p. 4.5-7 to 4.5-8)*

Referencing the above actions, the fire department is able to make notifications to initiate the Geographic Response Plan including notification of the appropriate local, county and state agencies as well as initiate contact with the railroad. We will also initiate the actions contained within Guide 128 of the Emergency Response Guidebook with regards to product identification and provide for life safety by following the recommended evacuation distances.

We do not have the equipment or resources necessary to confine a large spill or apply Class B or Alcohol Resistant Aqueous Film Forming Foam (AR-AFFF) for vapor suppression. The Aberdeen Fire Department's AR-AFFF capability will be discussed in the next section of this document.

Response RLA1-2

Final EIS Section 4.5.2.1, *Oil Spills,* reflects the addition of information on response actions. See responses to detailed comments below regarding Aberdeen Fire Department capabilities to respond to a large spill resulting from a derailment.

Comment RLA1-3

2. Response and mitigation of fire or explosions associated with crude oil and Methanol

As the Fire Chief of the Aberdeen Fire Department I am tasked with planning and preparing for the safety of the citizens of Aberdeen. A fire involving a railcar carrying either crude oil or Methanol would require a coordinated response from multiple agencies including local, state, and federal response organizations. Chapter 4, Environmental Health and Safety, Section 4.5.2.2-Fires or Explosions, p. 4.5.11 of the Draft EIS states the following:

"PHMSA provides guidance for a fire or explosion from a train carrying crude oil (Pipeline and Hazardous Materials Safety Administration 2014), which states that, 'in the event of an incident that may involve the release of thousands of gallons of product and ignition of tank cars of crude oil in a unit train, most emergency response organizations will not have the available resources, capabilities, or trained personnel to safely and effectively extinguish afire or contain a spill of this magnitude (e.g., sufficient firefighting foam concentrate, appliances, ***equipment****, water supplies). Response to unit train derailments of crude oil will require specialized outside resources that may not arrive at the scene for hours; therefore it is critical that*

responders coordinate their activities with the involved railroad and initiate requests for specialized resources as soon as possible."

According to the US Department of Transportation's Commodity Preparedness and Incident Management Reference Sheet (PHMSA Petroleum Crude Oil Reference 09/2014), a single tank car containing 30,000 gallons of crude oil involved in a spill with fire would require a minimum of 216 gallons of 3% Class B foam for the INITIAL 15 minutes of operations. They add that reapplication of foam will be necessary to maintain an adequate foam blanket. That quantity of Class B foam is well beyond the current capability of the Aberdeen Fire Department to carry or apply effectively. With regards to Methanol, as previously stated the Aberdeen Fire Department does not have AR-AFFF capability. A mutual aid response agreement with the Hoquiam Fire Department does provide access to a flatbed truck (HFD 7319) that carries four (4) 265 gallon AR-AFFF foam totes and a 300 gallon Purple K dry extinguisher. This apparatus does not have pumping capability and must be paired with a fire engine to pump and provide the foam. This resource is not staffed on a daily basis by the Hoquiam Fire Department and its response and deployment timeframe has not been tested within the City of Aberdeen under emergent conditions.

Response RLA1-3

Final EIS Section 4.5.2.2, *Fires or Explosions,* reflects the addition of information on response actions. Final EIS Sections 4.4.3 and 4.4.3 reflect two additional applicant mitigation measures. The first measure proposes that the applicant will ensure that the City of Hoquiam Fire Department has adequate fire-fighting equipment to respond to incidents at the project site. The second measure proposes that the applicant provide training related to fire or explosions on the facility site for fire department personnel from both jurisdictions (Hoquiam and Aberdeen). In addition, the applicant has voluntarily committed to supplying three totes of foam at the project site. This voluntary measure has been added to Final EIS Section 4.4.3.1, *Voluntary Measures and Design Features*.

The mitigation measures in Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* propose that the applicant ensure there is prepositioned spill containment, cleanup equipment, and trained personnel to respond to a rail incident. In addition, mitigation is proposed for the applicant, along with PS&P, to engage local fire districts in a public safety drill at least once every 2 years and to test one geographic response plan strategy (for oil spills) annually. Other proposed mitigation measures support enhancement of current first-responder capabilities, including a meeting between local emergency management officials and PS&P to identify training needs for local responders who will respond to an emergency on the PS&P rail line. The Grays Harbor Local Emergency Planning Committee and its emergency response plan are important resources already in place that can be leveraged to improve local responder effectiveness and capabilities in response to an incident related to the proposed action.

Comment RLA1-4

3. Emergency Vehicle Access

The impact to emergency vehicle access to the areas of the Gateway Mall in East Aberdeen, the commercial area adjacent to the Poyner Switching Yard, and the commercial occupancies at the Port of Grays Harbor that are isolated when a train occupies the tracks are well documented in the Draft EIS. The process of making up trains headed East, according to the Draft EIS, would block all access to the Gateway Mall for a significant amount of time. The Draft EIS in Chapter 3 - Affected

Environment, Impacts, and Mitigation, p. 3 .16-25 reports two existing alternate access points for the Gateway Mall area.

"As described previously in the vehicle delay discussion, vehicle delay would be most substantial in Centralia and Aberdeen. Therefore, emergency response in Centralia and Aberdeen would experience the most delay from blocked grade crossings under the proposed action.

Vehicle delays in the Olympic Gateway Plaza area are substantial because the seven grade crossings at the plaza provide the only vehicular emergency access to and from the plaza area and Morrison Riverfront Park, immediately east of the plaza. Emergency response vehicles would experience more frequent and longer delays to access the Olympic Gateway Plaza area under the proposed action because there is no alternate roadway access to the plaza area. However, there are two existing alternate options to access the Olympic Gateway Plaza area when trains block grade crossings.

- A paved recreational path approximately 1 mile long and 8 feet wide extends from Morrison Riverfront Park immediately east of the Olympic Gateway Plaza to Junction City Road to the east, the grade crossing east of the Fleet Street entrance to the Olympic Gateway Plaza area. The path parallels the Chehalis River and the PS&P rail line.
- A paved trail approximately 750 feet long extends from the Aberdeen Hotel parking lot (located between East Heron Street [US 12 eastbound] and the PS&P rail line) to the west side of Walmart The trail passes underneath the PS&P rail line Wishkah River bridge. This underpass is approximately 11 feet wide and 8.5 feet high.

These paths could provide alternate emergency vehicle access to the Olympic Gateway Plaza area and Morrison Riverfront Park when a train blocks all emergency vehicular access to the plaza area. (Chapter 3 - Affected Environment, Impacts, and Mitigation, p. 3.16-25)

In reference to the paved recreational path that extends 1 mile along Morrison River Front Park; it is designed for foot traffic only and is accessible from Sargent Blvd which is the access road to Junction City. The pathway will not accommodate emergency response vehicles. Approximately 1/4 mile from the Sargent Blvd. access point the trail consists of a 7 1/2 foot wide by approximately 200 foot long metal grated pedestrian bridge that connects the two sections of paved pathway.

In reference to the paved trail and underpass that extends under the PSAP rail line that is accessed from the Aberdeen Hotel Parking lot, it is a temporary solution at best. Only our Command Unit, which does not have firefighting or medical patient transport capability, can access this site. It is important to note access this property is the private property of the hotel. We cannot access this underpass with either an ambulance or fire engine. As of today, 10/14/15 at11 AM, this access point was blocked by a large debris pile generated from the ongoing remodel of the hotel. An easement and improvement of this access point would need to be negotiated with the land owner for this to be considered a viable temporary solution.

Response RLA1-4

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, has been updated to clarify the PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas. The Final EIS reflects the addition of a proposed mitigation measure to improve the timeliness of emergency response to properties south of the rail line in the Port area.

Comment RLA1-5

Chapter 3 -Affected Environment, Impacts, and Mitigation, Section 3.16.7.1, Applicant Mitigation, p. 3.16.28, states the applicant "will ensure that an emergency response vehicle with an 8-foot clearance is available and staged at the City of Aberdeen Fire Department". This concept has not been discussed in detail with the Aberdeen Fire Department. From an operational perspective, choosing which apparatus to respond with based on possible railway grade crossing closures is not practical with our current staffing and response model. The capabilities of the 8 foot clearance emergency response vehicle are not defined in the EIS. We are assuming the intent for this vehicle would be to access the low clearance access points at the Gateway Mall and the Wishkah River Bridge (intersection of River and F St.) for medical responses. Not addressed is the inability of our agency to provide fire suppression to the areas isolated when the railway grade crossings are blocked. The crossings include the Gateway Mall, Poyner Yard and the commercial properties south of the rail line in Aberdeen and the Port of Grays Harbor. The Draft EIS indicates that foam equipped fire engines would be provided to the Cities of Elma and Hoquiam and that the Washington State Department of Ecology should be tasked with providing agencies with grants for fire apparatus. The Aberdeen Fire Department is responsible for providing initial fire response for railway incidents on the east side of the Port of Grays Harbor, the Poyner Switching Yard, and the rail line through East Aberdeen. Guide #128 of the ERG indicates the initial evacuation distance for fires in railcars (Crude Oil or Methanol) is 1/2 mile. The rail line is within 1/2 mile of the city's densely populated downtown core, residential neighborhoods, and the occupancies of the Gate Way Mall.

It is my recommendation, based on the preceding factors listed, that the Aberdeen Fire Department's fire suppression capabilities be evaluated and augmented to effectively mitigate flammable liquid rail car fires. Included in this recommendation is the request that specialized flammable liquid response training, such as that offered at the Security and Emergency Response Training Center in Pueblo, CO be made available to the members of the Aberdeen Fire Department.

Response RLA1-5

Final EIS Chapter 4.4.1.3, *Response,* includes the information on initial response actions. Final EIS Chapter 3, Section 3.16.7.1, *Applicant Mitigation*, reflects the removal of the mitigation measure to provide the Aberdeen Fire Department with an emergency vehicle with an 8-foot clearance. Refer to Response to Comment RLA1-4.

Final EIS Chapter 4, Section 4.4.3.1, *Applicant Mitigation*, reflects the addition of a mitigation measure proposing that the applicant ensure that the City of Hoquiam have adequate fire-fighting equipment to respond to an incident at the project site. A second added measure proposes that the applicant provide training related to fire or explosions on site for fire department personnel from both jurisdictions (Hoquiam and Aberdeen). A third proposed mitigation measure is to develop a GIS layer that identifies critical facilities near the facility and along the PS&P rail line to improve local emergency planning and response.

Draft EIS Chapter 4, Section 4.5.3.2, *Applicant Mitigation*, proposes measure that the applicant will not accept crude oil by rail until PS&P meets with local emergency management officials to identify training needs for local responders who will respond to an emergency on the PS&P rail line. This effort would include development and execution of a training program to these responders to increase level of awareness and understanding of the hazards associated with an oil train incident.

The training, to be offered at least annually, would include identification of notification protocols, use of personal protective equipment, and equipment deployment procedures.

Comment RLA1-6

4. Marine terminal shore side firefighting response capabilities.

Contained within the Draft EIS are the impacts that increased production or storage of crude oil and Methanol would have on the marine transportation of the products. Strictly from a Hazards Analysis and Capability assessment viewpoint, neither the Aberdeen nor Hoquiam Fire Departments are equipped or trained to mitigate a ship fire involving flammable liquids. We do not have access to a fire boat nor do we have the expertise or personnel to adequately and safely manage these labor intensive and technical incidents.

In closing, thank you for taking the time to review the comments I have provided in response to the Draft EIS. If you have further questions please do not hesitate to contact me directly.

Respectfully,

Tom Hubbard
Fire Chief

Response RLA1-6

Final EIS Chapter 4.6.2.2, *Fires or Explosions,* added the information on the capabilities for initial response actions by the Aberdeen and Hoquiam Fire Departments for a ship fire. Waterside fire-fighting capabilities require coordination among the assets of Grays Harbor County, the U.S. Coast Guard, and private interests. Final EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels, Large Commercial Vessel Operations, Tug Services*, has been updated to reflect fire-fighting capabilities of the Z-drive tug stationed in Grays Harbor.

RLA2, Board of Thurston County Commissioners, Sandra Romero

Comment RLA2-1

Thurston County
Washington
Since 1882

County Commissioners

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Sandra Romero
District Two
Bud Blake
District Three

Board of County Commissioners

Westway and Imperium Terminal Services Expansion Projects EISs

c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

SUBJECT: Draft Environmental Impact Statements (EIS) for Westway and Imperium Expansion Projects

To Whom It May Concern;

Thank you for the opportunity to comment on the Draft Environmental Impact Statements (DEIS) for the proposed Westway and Imperium Terminal Crude Oil Storage and Handling Expansion Projects in the Port of Grays Harbor in Southwest Washington.

As a County Commissioner, I represent the citizens of Thurston County who are both directly and indirectly impacted by rail traffic and the growing risk of oil leaks, spills, fires, and explosions in our community.

The draft DEISs for these projects indicate that there have been accidents on the spur rail line that runs through south Thurston County. According to the DEISs, necessary repairs will be made sometime in the future, but there are no specifics about maintenance, or the funding sources for such repairs. This is not acceptable to the safety of Thurston County residents.

Increased oil and coal trains already snarl traffic; delaying emergency vehicles, truck freight, and commuters at at-grade crossings. Adding poorly maintained rail lines to the equation adds catastrophic risks from oil train derailment, explosion and fire to my list of concerns. I urge you to ensure the final EISs analyze how my community, and others along the railways and waterways, would be impacted by these proposals. Thank you again for the opportunity to comment.

Sincerely,

Sandra Romero
Commissioner, District 2

Response RLA2-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

RLA3, City of Ocean Shores, Crystal Dingler

Comment RLA3-1

The Ocean Shores' City Council passed a resolution on November 23, 2015 (attached) authorizing me to submit this response on behalf of our City government and citizens. Ocean Shores was not mentioned in this DEIS. We have miles of beaches and shoreline both in the Harbor and on the ocean without any viable local response mechanism in place. Nearly 6,000 people live on this 8 mile long, 2 mile wide peninsula at the mouth of Grays Harbor, and 50,000 may visit on a weekend, helping maintain our economy healthy. Thousands come to dig razor clams, view Snowy Owls, and enjoy the beach. 2014 B & O Tax showed gross revenues of over $91 million, supporting hundreds of local jobs. A single oil spill would devastate our environment, way of life, and livelihood. We request that no permits be issued to Westway and Imperium on these projects.

Response RLA3-1

Refer to the Master Response for Purpose and Focus of the EIS. Responses to specific issues are below. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Comment RLA3-2

If shipping crude oil through Grays Harbor is further considered, we have many questions and concerns.

1. Small spills. How would frequent small oil spills while loading or unloading crude oil be prevented or mitigated? Such spills would severely and adversely affect our beaches, birds, marine life, and economy.

Response RLA3-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment RLA3-3

2. Increased shipping traffic and ship size. The DEIS Summary p. S-16 states that vessel traffic would increase by about one vessel per day. The Draft EIS Vessel Traffic Fact Sheet states that, "The Westway project would add up to 238 additional vessel trips (one-way travel) per year. The Imperium project would result in up to 400 vessel trips a year." Which is correct? How will such an increase in vessels be managed? Will vessels be milling around outside the bar waiting to be allowed into the Harbor? Can unwieldy fully-loaded vessels exiting the Harbor avoid collisions with them?

Response RLA3-3

As described in Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, the proposed action would result in up to 238 tank vessel trips per year, which is equivalent to 0.7 vessel trip per day, on average. Chapter 6, *Cumulative Impacts*, considers the impacts of increased vessel trips related to the cumulative projects, including the REG (formerly Imperium Terminal Services) Expansion Project. Section 3.17.4.4, *Vessel Traffic Management*, describes vessel traffic management authorities and practices in Grays Harbor. Final EIS Section 3.17.4.4 reflects additional information related to the role of the pilots in preserving a safe vessel traffic system. Draft EIS Section 3.17.7.1, *Applicant Mitigation*, proposes mitigation measures to reduce the risk of a potential vessel incident.

Comment RLA3-4

The barge Nestucca dumped as much as 231,000 gallons of crude oil into the Pacific Ocean off Ocean Shores (Pullman Daily News 11/2/89). Oil hit beaches from Coos Bay to Cape Flattery. Panamax class oil ships could carry 17 million gallons. The Exxon Valdez 1979 oil spill was 11 million gallons. How would 17 million gallons of oil be cleaned off the beaches? What would it do when the crude sank? How would this disaster be paid for? How would the blow to our City's economy be mitigated?

3. Large oil spill planning and preparedness. The 1989 Nestucca spill resulted in ~2400 dead and dying birds on our Ocean Shores beaches, with an estimated 56,000 dead birds overall. In the Nestucca spill, our Convention Center was turned into a bird cleaning station for thousands of birds. Few survived. How will treatment of birds, marine life and animals be dealt with? Who will pay? How will the loss of business, perhaps for years, be mitigated? Will the applicants help us prepare, purchase equipment and supplies, store them, and train our potential volunteers (and keep those materials and people at a readiness level that is meaningful) to save our miles of beaches and bay-front tidelands? As mitigation, at least a round-the-clock oil spill response unit should be placed in Ocean Shores.

Response RLA3-4

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Final EIS Chapter 4, *Environmental Health and Safety,* and Chapter 5, *Extended Rail and Vessel Transport,* reflect additional information about the existing emergency response framework available to respond to oil spills in the study area and extended study area. Final EIS Chapter 4 also proposes additional mitigation measures to help address the risks of oil spills, fires, and explosions related to the proposed action.

Comment RLA3-5

4. Earthquake and tsunami threats. How will the design of the storage and loading facilities be done to avoid oil spill damage caused by earthquakes and tsunamis? Can the lack of required tsunami planning in such construction be overruled by the State?

Response RLA3-5

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment RLA3-6

5. Critical coastal areas. In a spill, environmentally critical areas will be addressed first. In our view, the entire coast, associated wetlands and estuaries are environmentally critical. Will some areas wallow in crude oil while others are addressed? Will large commercial oyster interests take priority over the recreational razor clam beds we share with Quinault Nation commercial interests? 6. Further study. The DEIS states several times that large spill mitigation is impossible. That should preclude the issuing of permits altogether. If it does not, the potential for spill impacts and mitigation must be further studied and scoped, and oil spill mitigation responses factored in.

Response RLA3-6

The response to any oil spill is unique and will be managed using federal and state regulations and guidance. Plans are developed at the federal, regional, state and local levels to assist in responding to oil spills. Draft EIS Chapter 4, Section 4.2.2.2, *Northwest Area Contingency Plan*, describes the planning framework in place for Washington State and discusses the factors considered when planning and implementing a response effort, including the development of geographic response plans. Geographic response plans are part of Northwest Area Contingency Plan. Each plan is written for a specific area (e.g., the Chehalis River or Grays Harbor) and includes tactical response strategies tailored to a particular shore or waterway at risk of injury from oil. Geographic response plans have two main objectives: to identify sensitive resources at risk of injury from oil spills and to direct response actions related to sensitive resource protection during the initial hours of a response. These plans help coordinate response efforts by the responsible party and federal and state agencies. Strategies in the plan are deployed by responders after the immediate concern of controlling and containing the source of a spill has been addressed. Geographic response plans contain maps and descriptions of natural, cultural, and economic resources and identify strategies to reduce harm to those resources. They also prioritize which response strategies should be implemented based on the location of the spill.

Draft EIS Chapter 4 considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

RLA4, City of Olympia, Stephen Buxbaum

Comment RLA4-1

City of Olympia | Capital of Washington State
P.O. Box 1967, Olympia, WA 98507-1967
olympiawa.gov

November 30, 2015

Westway and Imperium Terminal Services Expansion Projects
c/o ICF International
710 Second Avenue, Suite 550
Seattle, Washington 98104

Subject: Draft Environmental Impact Statements (EIS) Scoping for Westway and Imperium Expansion Projects

To Whom It May Concern:

We are responding to the draft Environmental Impact Statements (EISs) prepared in consideration of the proposed Westway Terminal Company LLC and Imperium Terminal Services application to expand existing bulk liquid storage terminals located at the Port of Grays Harbor Terminal 1.

The City of Olympia has previously opposed development and expansion of oil by rail transfer by unanimous resolution of the City Council [November 25, 2014, Resolution #M-1812]. We believe it is important to reiterate our serious concern over the projects proposed for Grays Harbor County.

The draft EIS should more carefully and fully qualify and quantify the devastating impact that expanded facilities will have on the communities, regional economy and environment of Washington State. Consideration of facilities in Grays Harbor need to be viewed in a broader context given the number and the extend to which oil and coal export facilities are being proposed for coastal Washington and Oregon.

Our concerns include:

Projected derailments on shared track that serves the entire region is not clearly or completely quantified and qualified. movement of empty trains, which some studies show as being more at risk of derailment than full, is of serious concern given how interconnected the state's rail system is. Derailment of even one train containing petroleum could potentially create chaos on our rail system for months or years.

Response RLA4-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment RLA4-2

Environmental concerns continue to be understated in terms in the consequences of global warming. Ocean acidification, loss of marine habitat, sea level rise, changes to weather patterns and cycles - these and other issues must be directly considered when it comes to the transfer and expansion of high volumes of oil to Pacific Rim Nations. The consequences of filling our atmosphere from cargo transferred through our public ports must be fully considered.

Additional concerns pertain to potential for treaty right violations and inadequate local regulatory and emergency response systems and protocols.

We implore you to fully consider the devastating consequences of expanding transport of products that are responsible for global warming. Thank you for your consideration.

Sincerely,

Stephen H. Buxbaum
Mayor

Nathaniel Jones
Mayor Pro Tem

cc: Olympia City Council

Response RLA4-2

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, acknowledges that greenhouse gas emissions from the cumulative projects would contribute to global greenhouse gas emissions, which contribute to climate change. The section also describes the projected impacts of climate change in the Pacific Northwest.

Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, describes potential impacts of the proposed action on tribal resources.

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for information on emergency response systems and protocols.

RLA5, City of Washougal, David Scott

Comment RLA5-1

COMMENTS on the Draft Environmental Impact Statements for Westway and Imperium Expansion Projects

1. Reference: General Comment

Comment:

Washington State, in this case the Department of Ecology, has a responsibility under its SEPA regulations to evaluate proposed actions to determine the extent of a potential impact to citizens of the state and to apply reasonable mitigation actions to reduce risk to insignificant levels before the proposed action is approved.

The greatest potential risk to public safety presented by the proposed actions involves a unit train accident/derailment in a populated area with a release of crude oil, resulting in a major explosion/fire. Such an event would quickly overwhelm the abilities of local first responders and could require mass evacuation of local residents. The loss of human life is a real possibility. These risks are not just theoretical – these scenarios have occurred throughout the nation.

A significant impact to public health presented by the proposed actions involves a unit train accident/derailment in a populated area with a release of crude oil, resulting in contamination of groundwater supplies for municipal drinking water wells serving urban populations. Such an event would totally compromise the drinking water supply for a municipality, resulting in a significant impact to the public health of a community.

The geographic "study area" specified in the DEISs is limited to a very small portion of the unit train transportation route. Ecology has evaluated the public safety and health risks of a unit train accident within the study area and has included mitigation actions to protect the local citizens.

The far greater threat to Washington citizens is related to crude oil-by-rail transport through the state before the trains reach the study area; i.e., the "extended study area". Unit train speed limits, for example, are significantly higher in the extended study area. The threat to citizens who live in the extended study area is also significantly increased by the sheer volume of crude oil transported through their communities on a daily basis. Crude oil unit trains other than those associated with the proposed action include existing traffic that transits through these communities along the Columbia River Gorge. Additional proposed projects within the region (e.g., Tesoro-Savage and NuStar facilities at the Port of Vancouver and a refinery at the Port of Longview) would overshadow the unit train traffic along the Columbia River Gorge attributable to the proposed Westway and Imperium expansion projects. Nevertheless, the proposed Westway and Imperium expansion projects have an additive effect and further stress the abilities of local communities to respond to a rail incident and add to the overall risk of the local citizens.

Ecology has not done an adequate job of analyzing cumulative impacts of the proposed actions within the extended study area and has dismissed the need for any mitigation actions to protect the citizens. This level of analysis within the extended study area, and specifically for the City of Washougal, is substandard and unacceptable. Many of the following specific comments offered by the City of Washougal are based on this theme.

Recommendation:

Ecology should conduct the risk analysis related to crude oil-by-rail transport throughout the extended study area in Washington State in the same manner as it analyzed risks within the study area. This would include a thorough analysis of cumulative impacts within the extended study area, as required by the SEPA regulations. Ecology should specify appropriate and realistic mitigation measures for transport of crude oil-by-rail in the extended area.

Additional recommendations related to this comment are detailed in the other specific comments offered by the City of Washougal.

Response RLA5-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment RLA5-2

2. Reference: DEIS Chapter 3.15

Comment:

The study area for rail traffic includes the Puget Sound & Pacific Rail line from Hoquiam to its junction with the BNSF main line in Centralia. It does not include the portion of the BNSF main line that passes through the City of Washougal. The impact analysis is based on risk factors for the study area, not risk factors associated with the trains that pass through Washougal. The “extended study area”, as defined in the DEISs, includes the BNSF main line from Centralia, Washington to the Bakken formation in North Dakota.

The extended study area within the State of Washington, which includes the City of Washougal, should receive the same level of analysis as the study area so that the state and local governments, including Washougal, can understand the potential impacts to their jurisdictions.

Recommendation:

Expand the rail traffic study area to include the City of Washougal. Perform a public safety risk analysis that considers risk factors that are specific to Washougal, including the potential for a derailment, the consequences of such an event and the City's vulnerability.

Response RLA5-2

Refer to Response to Comment RLA5-1.

Comment RLA5-3

3. Reference: DEIS Chapter 3.15 and Chapter 5.4.3

Comment:

The proposed projects would receive crude oil in unit trains of up to 120 rail tank cars. These trains would pass through the City of Washougal in route to their destination in Hoquiam. The combined projects could add 11.4 additional loaded unit trains per week.

According to BNSF, 18 unit trains loaded with crude oil on average passed through Washougal each week in 2014 (Ch.5.4.3, page 18, Figure 5-7). The combined number of trains passing through the City now rise to an average of 29.4 per week or 1,528 per year. This is an increase of approximately 63 percent. This does not include the additional rail traffic that would be generated by proposed major crude oil facilities in the Vancouver area (e.g., Tesoro-Savage and NuStar) and the cumulative impacts of all oil-by-rail traffic.

Recommendation:

Expand the rail traffic analysis to include crude oil unit trains that pass through the City of Washougal. The analysis should also include the cumulative impact of existing and anticipated future unit trains over the design life of each proposed expansion project as a risk factor.

Response RLA5-3

Refer to Response to Comment RLA5-1.

Comment RLA5-4

4. Reference: DEIS Chapter 3.15.4.2 and DEIS Chapter 5.4.3.2

Comment:

Federal Railroad Administration (FRA) regulations limit the maximum train speed at 25 mph for the unit trains that pass through the study area. These same unit trains are allowed to travel at speeds up to 40 mph (Ch. 5.4.3.2, page 11) when transiting though Washougal, a city with numerous grade-level crossings. This increased speed is a significant factor in the analysis of the likelihood of a major train derailment.

Recommendation:

Perform a risk analysis of unit train rail traffic transiting through the City of Washougal. The analysis should include a 40 mph train speed as a risk factor.

Response RLA5-4

Refer to Response to Comment RLA5-1.

Comment RLA5-5

5. Reference: DEIS Chapter 4.1

Comment:

The study area for Environmental Health and Safety impacts associated with unit train rail transport includes the Puget Sound & Pacific Rail Line from Hoquiam to its junction with the BNSF main line in Centralia. It does not include the portion of the BNSF main line that passes through the City of Washougal. The impact analysis is based on risk factors for the study area, not risk factors associated with the trains that pass through Washougal.

Recommendation:

Expand the Environmental Health and Safety study area to include the City of Washougal.

Response RLA5-5

Refer to Response to Comment RLA5-1.

Comment RLA5-6

6. Reference: DEIS Chapter 3.16

Comment:

The impact on emergency vehicle access and response at grade level crossings was analyzed within the study area. The analysis identified areas where emergency vehicle access and response would be substantially impacted. An emergency vehicle impact analysis was not done for the City of Washougal.

Recommendation:

Expand the analysis of rail traffic impact on emergency vehicle access and response to include the City of Washougal.

Response RLA5-6

Refer to Response to Comment RLA5-1.

Comment RLA5-7

7. Reference: DEIS Chapter 5.5.1.1

Comment:

The DEISs note that the risk of a derailment, oil spill, or incident involving rail cars is expected to increase with the increase in rail traffic in the extended study area. This level of risk increase, however, was not described or quantified in any way.

Recommendation:

The increased risks to Washougal should be analyzed and quantified so that residents and government agencies can better understand the public safety and health impacts of the proposed projects.

Response RLA5-7

Refer to Response to Comment RLA5-1.

Comment RLA5-8

8. Reference: DEIS Chapter 5.6

Comment:

The DEISs state that rail accidents have a low likelihood in the extended study area, apparently in consideration of the "low" number of trains per day that would support the proposed expansion projects. The proposed projects have a maximum of 1,188 trains per year, or 142,560 oil tanker cars per year (average 120 cars per train) passing through Washougal. This is 23,760 trains or 2,851,200 tanker cars over the 20-year project period. The assumption of a low likelihood of a rail accident in the extended study area is not supported by the information in the DEISs.

Section 5.6 also states that "a risk of a major spill, fire, explosion, or derailment in the extended study area exists but has a low likelihood based on the small increase in overall rail and vessel traffic due to the proposed actions. Therefore, no mitigation is proposed in the extended study area". SEPA regulations clearly state that although the likelihood of an event may be small, the consequence of that event can be sufficient to categorize the risk of that event as "significant". The decision that "no mitigation is proposed in the extended study area" is without basis and cannot be supported by the DEIS.

Recommendation:

The SEPA analyses should consider the likelihood of rail accidents in the extended study area by specific locations and particularly in or near population centers, such as the City of Washougal. Calculations should include the likelihood of rail accidents in these areas over the design life of the proposed expansion projects (assumed to be 20 years).

Categorize the overall risk of a rail transport accident in and around the City of Washougal using the same quantitative methods of risk calculations that were used for the study area. Apply mitigation actions to the transport of oil-by-rail through Washougal, based on the actual risks posed. The actual risks are a function of likelihood and consequence of an accident involving a crude oil unit train.

Response RLA5-8

Refer to Response to Comment RLA5-1.

Comment RLA5-9

9. Reference: DEIS Chapter 5.7

Comment:

The DEISs state the potential for significant adverse impacts is high in the extended study area. They state that the likelihood of a large spill, fire or explosion is low, "the potential for significant adverse

impacts on the environment and human health in the case of such an incident is high". The magnitude of these impacts, however, is not further described or quantified.

Recommendation:

The analysis should assess and describe and quantify these potential high impacts to locations within the extended study area over the design life of the proposed expansion projects. A quantitative analysis of risk to public safety and health is of particular importance to population centers, including the City of Washougal. A detailed analysis of local conditions (e.g., number of miles, train speeds, number of at-grade crossings, etc.) is necessary to conduct a defensible quantitative statement of risks and impacts to public safety.

Response RLA5-9

Refer to Response to Comment RLA5-1.

Comment RLA5-10

10. Reference: DEIS Chapter 5.6 and Chapter 5.7

Comment:

The DEISs state that no mitigation measures are proposed for the extended study area, apparently because none would completely eliminate adverse consequences of large spills, fires or explosions. This is despite the description of many mitigation measures for the study area (see DEIS Section 4.5.3), where they also could not completely eliminate adverse consequences.

Recommendation:

The analysis should describe specific mitigation measures for Washougal, including first-responder capabilities and assets, and their effectiveness in mitigating the potential high impacts to public safety, and mitigation to the impact to groundwater supplying Washougal's drinking water wells.

Response RLA5-10

Refer to Response to Comment RLA5-1.

Comment RLA5-11

11. Reference: DEIS Chapter 6.4.2

Comment:

The plans and elements reviewed for the cumulative impacts were limited to those related to the study area. The cumulative impacts do not address plans for the extended study area, which would include, among others, foreseeable actions for new oil terminals, storage and transfer facilities and a refinery proposed in or near Vancouver, Washington. These are not addressed in Section 6.5.8 and will all increase the cumulative impacts in the extended study area.

Recommendation:

The discussion of cumulative impacts should address the reasonably foreseeable actions in the expanded study area. Specially, a discussion and quantitative assessment of cumulative impacts of

reasonably foreseeable actions related to public safety and health near and within the cities of Vancouver and Washougal should be provided.

12. Reference: DEIS Chapter 6.5.8.1

Response RLA5-11

Refer to Response to Comment RLA5-1.

Comment RLA5-12

Comment:

The DEISs describe that the cumulative impacts could result in increased risks of a derailment, oil spill or other incidents involving rail cars in the extended study area. The likelihood and consequences of this increased risk are not described, nor are the increased risks quantified.

Recommendation:

The analysis should assess and describe the likelihood and magnitude of these increased risks to Washougal. The same process for quantifying cumulative impacts within the study area should be used to quantify the cumulative impacts of increased rail traffic within the City of Washougal.

Response RLA5-12

Refer to Response to Comment RLA5-1.

Comment RLA5-13

13. Reference: DEIS Appendix M

Comment:

The risk assessment in Appendix M includes only the terminal and the study area (PS&P rail line and Grays Harbor Navigation Channel). The extended study area is not included, which excludes Washougal from the analysis.

Recommendation:

The risk assessment scope should be expanded to include the City of Washougal.

Response RLA5-13

Refer to Response to Comment RLA5-1.

Comment RLA5-14

14. Reference: DEIS Appendix M

Comment:

The risk assessment used the train speeds in the study area, which is a maximum of 25 mph. It notes that, in general, “slower speeds result in fewer cars derailed” (Appendix M, page 4-4). The DEISs did not describe the rail conditions and train speeds that may occur in areas outside the study area (e.g., Washougal), which may be greater than 25 mph.

Recommendation:

The risk assessment scope should be expanded to include the rail conditions and maximum train speeds near and within the City of Washougal.

Response RLA5-14

Refer to Response to Comment RLA5-1.

Comment RLA5-15

15. Reference: DEIS Chapter 4.1 and Chapter 4.5.2

Comment:

The Environmental Health and Safety Rail Transport analysis identified several accident scenarios ranging in size from small to large. The study makes an assumption that large accidents involving up to 30 tank cars with the potential for fire and explosions are less likely to occur than smaller accidents. Statistics show that the vast majority of accidental releases are relatively small and do not involve fires or explosions. The analysis used to determine the likelihood of a rail accident, its size and potential for fire and explosions was based on historical data for the rail study area (PS&P rail line), not the BNSF rail line that runs through Washougal. As pointed out in comment 3, the maximum train speed within the rail study area is 25 mph. The maximum train speed for the BNSF rail line that passes through Washougal is 40 mph. As stated in Ch.4.5.1, page 3, "The length of the train and train speed are critical factors in predicting the severity of a derailment. In general, the greater the mass and speed, the greater the force and potential impacts". A mile long unit train of crude oil derailing at 40 mph is much more likely to result in a large accident involving many, leaking, burning, exploding tank cars.

Recommendation:

Expand the Environmental Health and Safety study area to include the City of Washougal. The rail transport risk analysis should include historical data for rail traffic passing through Washougal and should also include the higher train speeds as a significant risk factor.

Response RLA5-15

Refer to Response to Comment RLA5-1.

Comment RLA5-16

16. Reference: DEIS Chapter 4.5.2.1

Comment:

This section of the Environmental Health and Safety Rail Transport analysis states: "The risk of an oil spill from train operations typically relates to the risk of derailment. A derailment does not mean a spill will happen; a train can derail with no spill resulting. A leak could occur during transport of the rail car but the spill quantity at a single point along the rail would likely be small because the leak could occur over several miles of track. Because of the increased number of rail trips to and from the project site, the proposed action would result in the potential for more frequent spills of bulk liquids relative to the no-action alternative, although the orders of magnitude are very similar. The likelihood of very large releases would remain low. As noted previously, it is not possible to

predict the timing or magnitude of an incident; therefore, the following spill scenarios were considered to provide an understanding of risks under the proposed action."

The analysis determined the likelihood of a rail accident that results in a spill could range from once every 105 years for a small spill (1 tank car involving up to 1,000 gals); to once every 74,000 years for a large worst-case scenario (30 tank cars involving up to 900,000 gals). It is important to note that this analysis was limited to maximum train speeds of 25 mph and historical data for the rail transport study area (PS&P rail line). It did not analyze the likelihood of a spill and potential fire or explosion for the BNSF main line that passes through the City of Washougal with a maximum train speed of 40 mph.

Recommendation:

Expand the Environmental Health and Safety study area to include the City of Washougal. The rail transport risk analysis should include historical data for rail traffic passing through Washougal and should also include the higher train speed as a significant risk factor.

Response RLA5-16

Refer to Response to Comment RLA5-1.

Comment RLA5-17

17. Reference: DEIS Chapter 4.5.2.2

Comment:

This section of the Environmental Health and Safety Rail Transport analysis states: "Although fires or explosions can result from spills resulting from events like collisions and derailments, long-term historical data show that most spills do not result in fires or explosions. A fire or explosion would be less likely to occur than a spill. While there have been multiple recent derailments of trains on main lines that resulted in fires or explosions, the chance of an extreme derailment is very limited in the study area because of the slow speeds on the PS&P rail line, which are slower than typical mainline speeds. In general, large derailments from high-speed trains lead to releases from multiple rail cars. The energy involved in high-speed derailments and the resulting scatter of rail cars yield the greatest chance of a fire that affects other rail cars and possibly result in an explosion." This statement reinforces the recommendations made regarding train speed in other comments.

Recommendation:

Expand the Environmental Health and Safety study area to include the City of Washougal. The rail transport risk analysis should include historical data for rail traffic passing through Washougal and should also include the higher train speed as a significant risk factor.

Response RLA5-17

Refer to Response to Comment RLA5-1.

Comment RLA5-18

18. Reference: DEIS Chapter 4.5.2.1

Comment:

This section of the Environmental Health and Safety Rail Transport analysis looks at oil spill emergency response. It states: "The federal oil spill response plan (49 CFR 130) currently applicable to rail operators with oil shipments of a capacity of 3,500 to 42,000 gallons per car does not require equipment to be contracted and available for an immediate response to an oil spill incident. In August 2014, PHMSA issued an advanced notice of proposed rulemaking seeking comment on potential revisions to its regulation to require operators of high-hazard flammable trains to prepare comprehensive oil spill response plans (79 FR 45080). The comprehensive plans would require better coordination, identification of personnel, equipment, and training for responses to spills, and submission of the plan to the Federal Railroad Administration".

Recommendation:

Include an additional mitigation measure that would require railroads that operate high-hazard flammable unit trains to: 1.) Prepare comprehensive oil spill response plans and provide annual training on the plan to affected local, state and federal response agencies. 2.) Cache appropriate firefighting emergency response equipment and make it available to local emergency responders for immediate response to an oil spill emergency.

Response RLA5-18

As noted in the revisions to Final EIS Chapter 4, Section 4.2, *Applicable Regulations*, a new rule, WAC 173-186, Oil Spill Contingency Plan—Railroad, has been finalized that establishes railroad oil spill contingency plan requirements, drill and equipment verifications that would be required of PS&P prior to operations. The mitigation measure presented in Draft EIS Chapter 4, *Environmental Health and Safety*, recommending that contingency planning by PS&P be completed will remain in place into the rule takes effect. Additionally, Final EIS Chapter 4 has been revised to include additional mitigation measure to address emergency response gaps. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

Comment RLA5-19

19. Reference: DEIS Chapter 4.5.3

Comment:

This section of the Environmental Health and Safety Rail Transport analysis identifies a variety mitigation measures involving emergency planning, training and equipment that would help reduce impacts related to rail transport. It also includes an assessment of local emergency response capabilities. Unfortunately the assessment and mitigation measures are limited to the rail transport study area along the PS&P rail line. It does not assess local emergency response capabilities for the City of Washougal or identify mitigation measures that could help close any gaps the assessment might reveal.

Recommendation:

Conduct a comprehensive emergency response capabilities gap analysis for the City of Washougal. The analysis should focus on the threat presented by crude oil unit trains. The analysis should consider the consequences of a worst case scenario (i.e., burning oil spill involving up to 30 rail tank cars) and make recommendations for mitigating measures that would help close any gaps that the analysis might reveal. Nevertheless, it is important to note that Chapter.4.5.4, page 16 states: "no

mitigation measures would completely eliminate the possibility of a large spill or explosion, nor would they completely eliminate the adverse consequences of a large spill or explosion".

Response RLA5-19

Refer to Response to Comment RLA5-1.

Comment RLA5-20

20. Reference: DEIS Chapter 4.7.2.1

Comment:

This section of the Environmental Health and Safety Rail Transport analysis states:

"Fires or explosions of crude oil are most likely to occur during transport when higher speeds provide enough energy to generate a spark. Recent incidents involving rail transport provide information about the potential impacts on human health related to incidents involving fires and in some cases, explosions… Many of these incidents involved trains traveling at speeds greater than speeds allowed on the PS&P rail line (25 miles per hour)".

This statement reinforces the recommendations made in other comments regarding train speed.

Recommendation:

Expand the Environmental Health and Safety study area to include the City of Washougal. The rail transport risk analysis should include historical data for rail traffic passing through Washougal and should also include the higher train speed as a significant risk factor.

Response RLA5-20

Refer to Response to Comment RLA5-1.

Comment RLA5-21

21. Reference: DEIS Chapter 4.7.2.2

Comment:

This section of the Environmental Health and Safety Rail Transport analysis is focused on the public health impact of a fire or explosion resulting from a unit train oil spill. Section 4.7.2.2 states: "For a fire or explosion, evacuations could be used to protect nearby residents. Emergency responders would determine if evacuations are needed". This is the only reference to the direct human health consequences of a fire or explosion. The analysis also considers the indirect human health consequence of air pollutants that would result from a fire.

Recommendation:

The Environmental Health and Safety Rail Transport analysis should include a more comprehensive study of all possible impacts and emergency response mitigation measures that could be implemented to help reduce the human health consequences of a large spill, fire or explosion in an urban area. The analysis study area should also be expanded to include the City of Washougal.

Response RLA5-21

Refer to Response to Comment RLA5-1.

Comment RLA5-22

22. Reference: DEIS Chapter 5.7

Comment:

This section of the analysis asks a very important question: "Would the proposed action have unavoidable and significant adverse impacts on rail and vessel transport in the extended area?"

The answer given states: "As discussed in Chapter 4, Environmental Health and Safety, large oil spills, fires, or explosions would likely include unavoidable and significant adverse environmental impacts. Although the likelihood of a large spill, fire, or explosion is low, the potential for significant adverse impacts on the environment and human health in the case of such an incident is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. Examples of these impacts are described in Section 4.7, *Impacts on Resources*. Existing regulatory requirements for the prevention, preparedness, and response to a large spill, fire, or explosion and mitigation measures to reduce impacts are detailed in Chapter 4. However, no mitigation measures would completely eliminate the possibility of a large spill, fire, or explosion from rail cars carrying crude oil or hazardous materials nor would they completely eliminate the adverse consequences of a large spill, fire, or explosion.

Unfortunately the analysis referenced above is based on the Rail Transport study area (PS&P rail line). It does not include the BNSF rail line that passes through the City of Washougal.

Recommendation:

Expand the study area for the Environmental Health and Safety rail transport analysis, to include the City of Washougal. The analysis should include historical data for rail traffic passing through the City of Washougal and should also include the higher train speed as a significant risk factor.

23. Reference: DEIS Chapter 3.3.4.5, 4.5.2.1 and 4.7.1.1

Response RLA5-22

Refer to Response to Comment RLA5-1.

Comment RLA5-23

Comment:

Chapter 3.3.4.5 addresses impacts to groundwater, but does not include impacts in the extended study area, specifically in the City of Washougal. Chapter 4.5.2.1 addresses the risk of an oil spill on Environmental Health, but does not include impacts in the extended study area, specifically in the City of Washougal. Chapter 4.7.1.1 addresses impacts on resources, specifically the impacts of an oil spill on groundwater, but does not include impacts in the extended study area, specifically in the City of Washougal. The City of Washougal's West-side wellfield, which consists of four wells and supplies two-thirds of Washougal's domestic drinking water supply, is located immediately adjacent to the BNSF rail line. Impacts from an oil spill along the BNSF line adjacent to the West-side wellfield have not been addressed.

Recommendation:

Expand the study area for Chapters 3.3.4.5, 4.5.2.1 and 4.7.1.1 to address impacts from an oil spill on the BNSF line adjacent to the City of Washougal's West-side wellfield. Impacts should be thoroughly evaluated and adequately analyzed and mitigation provided.

End of Comments

Response RLA5-23

Refer to Response to Comment RLA5-1.

RLA6, Grays Harbor County Water District #2, Reg Hearn

Comment RLA6-1

The rail line that will transport the crude passes within the water district's aquifer recharge area. The District would like specifics as to how a spill in that region would be handled. The District is surprised that we have not been contacted regarding this EIS.

Response RLA6-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. Section 4.7.1.1, *Water*, describes the potential impacts on groundwater as a result of an oil spill and acknowledges that the "highest risk of groundwater contamination from spilled crude oil would be along the PS&P rail line, which runs through several areas underlain by largely unconfined surficial aquifers."

The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including potential impacts on groundwater.

RLA7, Jefferson County Board of Commissioners, Tami Pokorny

Comment RLA7-1

November 23, 2015

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

Dear Interested Parties:

The purpose of this letter is to comment on the Draft Environmental Impact Statements [*footnote: http://www.ecy.wa.gov/geographic/graysharbor/terminals.html*] (dEISs) for terminal expansion projects proposed by Westway Terminal Company LLC (Westway) and Imperium Terminal Services

LLC (Imperium). We have concerns surrounding these projects and the harm that they may cause to the people and resources of Jefferson County and Washington State, both directly and indirectly. Comments that we submitted during the scoping process are attached for your reference.

The unavoidable and adverse significant impacts identified by the dEISs, in combination with the large number of recent crude-by-rail spills and the natural and human-caused disasters affecting bulk storage of oil, convince us that the proposed facilities present unacceptable risks to human health and safety, the ecological integrity of Grays Harbor, and to young people of today and generations to follow. The proposed projects will exacerbate climate change, ocean acidification and other worsening environmental conditions linked to human-caused C02 emissions - some of which have already impacted the shellfish industry and are risking jobs and resources within Jefferson County. [*footnote: http://www.ibtimes.com/co2-emissions-threaten-seafood-ocean-acidificati on-spreads-along-us-coastlines-1824158*]

The proposed projects will degrade the quality of day-to-day life for local people-for instance due to lost access to fishing areas and longer vehicle waits at railroad crossings-and the terminal projects will return relatively few local jobs. Instead, they will function to open the spigots wider for Bakken oil as well as Canadian tar sands oil destined for combustion in Asia. The proposed Grays Harbor projects, and the more than 20 other new oil, gas and coal terminals and pipelines proposed in the Pacific Northwest since 2012 [*footnote: http://www.sightline.org/research_item/northwest-fossil-fuel-exports-2*], point our region in the wrong direction -towards unmitigable degradation of our atmosphere, ocean, biosphere and climate.

Response RLA7-1

Comment acknowledged.

Comment RLA7-2

The new installations would create new ties between the Port of Grays Harbor and the fossil fuel industry just as renewable energy technologies gain ground elsewhere. [*footnote: http://www.huffingtonpost.com/adnan-z-amin/whatever-happens-in-pa ris_b_8523098. html*]

Grays Harbor estuary plays an important role in the lifecycles of iconic Northwest species such as Dungeness crab and salmon. Both are very important to Jefferson County's economy and to sustaining a way of life that is cherished by local residents as well as frequent visitors to coastal communities from places like Port Townsend, Sequim and Port Angeles.

Grays Harbor and the coast nearby provide habitat for numerous ESA-listed species. These include Southern Resident Killer Whales [*footnote: http://www.nwfsc.noaa.gov/research/divisions/cb/ecosystem/marinemammal/satellite_tagging/blog 2015.cfm*], marbled murrelets, snowy plovers, and streaked homed larks. Hundreds of thousands of shorebirds rely on marsh habitat in Grays Harbor during the annual spring migration. Increased numbers of vessel transits and increased vessel density in combination with the risks associated with challenging seas, weather and visibility place these animals at greater risk. Just one major oil spill could have dire consequences. Short of that, collisions with marine mammals will likely become more frequent. Releases of invasive species contained in ballast water or from vessels supporting biofouling organisms will become more serious. There will be more vessel noise, wakes and related impacts and consequences. We are convinced that unavoidable and adverse significant impacts to animals would indeed occur.

Response RLA7-2

Draft EIS Chapter 3, Section 3.5, *Animals*, addresses potential impacts on animals from construction and routine operation of the proposed action, including those described by the commenter. Impacts are not considered significant.

Comment RLA7-3

Anchoring in Grays Harbor is particularly challenging due to shifting current and sediments and periods of low visibility. In the EISs, please identify potential sites for a designated anchorage with specific requirements for tank vessels as described in 33 CFR 109.07 (Westway - 4.6.3.2) and describe how risks of grounding, dragging or losing anchor and collision at these sites will be minimized. Please also describe impacts to treaty rights, plants and animals due to shading and other impacts from anchoring activities in new location(s) and how these will also be¬ mitigated.

Response RLA7-3

Refer to Draft EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels, Anchorage Areas*, for anchorage information and management discussion.

Comment RLA7-4

According to the dEIS (Westway 3.5),

Ballast water discharge and vessels supporting biofouling organisms could transfer a variety of materials into Grays Harbor that could harm aquatic ecosystems. Primary among these contaminants are invasive marine plants and animals, bacteria, and pathogens that could displace native populations and harm aquatic life. Should an introduced species become a successful invader in a new environment, it can cause a range of ecological impacts. These include competing with native species and altering environmental conditions (e.g., increased water clarity due to mass filter feeding), altering food web and the overall ecosystem and displacing native species, reducing native biodiversity and even causing local extinctions...These aquatic system impacts can also lead to economic and public health impacts.

Simply monitoring for these impacts, as recommended and described in the EIS, is insufficient to protect ESA-listed species and their habitats. Some invading species could be impossible to eradicate and their impacts extremely difficult to mitigate.

Response RLA7-4

Potential ballast water impacts on the aquatic environment are addressed in Draft EIS Chapter 3, Section 3.4, *Plants*, and Section 3.5, *Animals*. Existing federal and state regulations address ballast water management. The Washington State ballast discharge regulations (RCW 77.120.040 and WAC 220-150) include reporting, monitoring, and sampling requirements of ballast water; all vessels must submit nonindigenous species ballast water monitoring data. Washington Department of Fish and Wildlife may also board and inspect vessels under WAC 220-150-033 without advance notice to provide technical assistance, assess compliance, and enforce the requirements of Washington State ballast water management program laws and regulations. Penalties and enforcement of not complying with the regulations are covered in WAC 220-150-080. To further minimize the risk of ballast water on vegetation communities and animals, proposed mitigation is included in Sections 3.4 and 3.5 for the applicant to develop and implement a monitoring plan in consultation with

Washington Department of Fish and Wildlife prior to the start of proposed operations. Refer to the Master Response for Mitigation Framework for an explanation of how mitigation measures were identified in the EIS.

Comment RLA7-5

The DEISs also provide no mitigation for vessel strikes or impacts of vessel noise on marine mammals. The statement for that "large whales...are not likely to enter the harbor" is incorrect. Gray whales are widely known to feed in shallow waters and are frequently seen inside of Grays Harbor. The conclusion that "there would be no unavoidable and significant adverse impacts" to plants and animals is untrue and should be corrected.

Response RLA7-5

Final EIS Chapter 3, Section 3.5, *Animals*, reflects additional information to address whale use of Grays Harbor, including frequent use by the gray whale. The vessel impact mechanisms described in Section 3.5 remain the same, but marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a higher risk from vessel strikes. Final EIS Section 3.5.5.2, *Proposed Action, Operations*, has been revised to reflect the higher risk for these species. However, the likelihood of vessel strikes and the potential for population-level impacts would remain low; therefore, potential impacts are not considered significant. As described in Draft Section 3.5.5.2, potential vessel noise impacts on marine animals also would not be significant. Therefore, mitigation is not proposed for these impacts.

Comment RLA7-6

The vast majority of railway accidents involve derailment.[*footnote: http://www.scientificamerican.com/report/train-tragedies-and-transformations*] The Puget Sound & Pacific Railroad connecting Chehalis with the Port of Grays Harbor has suffered for lack of maintenance and its historical accident rate is ten times the national average (Imperium - Chapter 4). The EIS anticipates that the implementation of additional rail improvements designed to support the proposed projects will still allow for an accident rate that is higher than the national average. One reason is that,

> For about 1,000 feet at a point about 4 miles west of Montesano, the speed limit is 10 mph. The track is on the bank of the Chehalis River. The soil condition is such that maintenance to the tolerance required for 25 mph speed limit is difficult. (Westway 3.15-11)

Please provide additional information about the history of maintenance, repairs and vulnerabilities of this section of track and more specific information about the soil condition, how it might vary and why maintenance to achieve 25 mph is difficult. Please quantify the increase in risk of an accident in this location if the proposed action, in addition to the Imperium and U.S. Rail projects, are implemented. If an accident occurs in this stretch, who and what would be affected by a spill or explosion in addition to the Chehalis River? Is relocating the track a viable option for improving safety here? What other options may exist?

Response RLA7-6

Consideration of relocating the railroad is outside the scope of this EIS. Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection

requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

The risk analysis considers different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety,* a spill could occur at any location along the rail or vessel routes. Scenarios were based on operations (and, in some cases, locations) where spills could occur more frequently or could result in a worst-case spill. The potential impacts from a spill would vary based on weather, tides, location and other factors. As noted in Section 4.5.2.1, *Oil Spills*, the risk of an incident along a specified length of railroad is proportional to that segment's length relative to the length of the PS&P rail line in the study area as the PS&P was analyzed for the full length, not individual segments. For example, the risk of an incident involving the release equivalent to one rail car (30,000 gallons [714 barrels]) anywhere along the 59-mile-long study area is once every 36 years. Because the 1,000-foot long segment identified in the comment is a small fraction of the study area, the chance of such an incident occurring in that location would a small fraction of the predicted frequency for the whole PS&P. This would be equal to once in 11,000 years for the proposed action and once in 3,300 years for the cumulative scenario. Even if the segment is viewed as more risky than an average stretch of track, the short length limits the overall risk exposure to a small fraction of the overall risk.

Section 4.2.2, *What framework prepares for an incident?* and Section 4.2.3, *What framework provides responses to an incident?* describe the regulations and guidance that govern how officials would respond to an oil spill, including information about response strategies developed in the Grays Harbor and Chehalis River Geographic Response Plans. The geographic response plans provide information on resources that could be affected by a spill at specific locations and on response strategies.

Comment RLA7-7

Around the world, crude oil storage terminals are vulnerable to natural disasters and disasters caused by human error. An online industry report from Control Global [*footnote: http://www.controlglobal.com/articles/2014/prevent-tank-farm-overfill-hazards*] from 2014 states,

It's safe to say that thousands of filling, emptying and transferring operations go on each month in these tank farms- maybe even every day. The overwhelming majority are done safely, but some result in overfills, which have led in a few cases to major incidents. Data compiled by a reputable operator in the United States estimated that an overfill occurred once in every 3,300 filling operations. [*footnote: "Atmospheric Storage Tanks," Risk Engineering Position Paper 01, Marsh Ltd*.]

Looking over the past couple of decades, we have some notable tank overfill incidents: Laem Chabang, Thailand, in 1999 (seven dead); Buncefield, UK, in 2005 (43 injured), and the Catano oil refinery in Bayamon, Puerto Rico, (three injured). All these involved spectacular explosions and fires with extensive damage to the facility.

Since 2012, it appears from the report that an updated standard (API 2350) is being adopted widely. This standard includes a risk assessment that "shall be used by the owner and operator to categorize risks associated with potential tank overfills". Please incorporate information about the updated API 2350 and this risk assessment into the EISs. Please also include a description of overfill incidents since 2012 that have occurred despite implementation of API 2350, if any. Can conclusions be drawn as to whether or not adoption of the new standard reduces the frequency and severity of incidents caused by overfills?

Response RLA7-7

While the recently published 4th edition of API 2350 is not a law or regulation, it is the accepted industry standard for safe practices related to preventing overtopping risks for aboveground storage tanks and the applicant will be following this guidance. Tank design requirements and prevention measures are discussed in Chapter 4, Section 4.2, *Applicable Regulations*. Final EIS Chapter 2, *Proposed Action and Alternatives*, reflects the addition of text to acknowledge that the proposed rail unloading facilities would include automated monitoring, which would be designed to shut down the offload pumps if the destination tank reaches a predetermined height, limiting the potential for overtopping risks consistent with the recommendations of API 2350, 4th edition. The applicant will also conduct a risk evaluation (assessment) following the format in API 2350, Appendix E, during the engineering design phase. Additionally, as noted in Master Response for Risk Assessment Methods, the risk assessment approach does not include an analysis of any single causal event. The approach is to consider the risks of the selected release scenarios presented in Appendix M and in Chapter 4 regardless of the causal event.

Comment RLA7-8

Another, perhaps more serious risk to tank farms is lightning. A study [*footnote: http://www.lightningsafety.com/nlsi_lls/Causes-of-Failures-in-Bulk-Storage.pdf*] from the UK states,

It is estimated that lightning accounts for 61% of all accidents in storage and processing activities, where natural events are identified as the root cause of the incidents. In North America, 16 out of 20 accidents involving petroleum products storage tanks were as a result a/ lightning strikes...there have been 150 tank fires in a 52-year period as a result of lightning. The Westway and Imperium dEISs each mention the word "lightning" once within a citation in the References listed in Chapter 8.1 of the Risk and Technical Reports (Appendix M). The word also comes up in two scoping comments. In the final EISs, please assess the risks posed by lightning within the Port of Grays Harbor and also to the unit trains and tank vessels within the extended study area.

Response RLA7-8

Draft EIS Chapter 4, Section 4.4, *Environmental Health Risks—Terminal (Onsite)*, describes the risk and potential for storage failure. Appendix M, *Risk Assessment Technical Report*, describes the data sources for the assumptions used to conduct the risk assessment for storage tank failure. Because storage tank failure could result from multiple factors, the analysis does not assume any one cause of tank failure. The tank failure rate for the analysis is based on studies that analyze historical data of previous storage tank releases caused by a variety of factors, including weather-related factors. Refer to Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Multiple design and operating codes, standards, and recommended practices help protect aboveground storage tanks from lightning: the American Petroleum Institute 650—Aboveground Storage Tanks; National Fire Protection Association 780—Standard for Installation of Lightning Protection Systems; American Petroleum Institute Recommended Practice 2003—Protection Against Ignitions Arising Out of Static, Lightning, and Stray Currents; and American Petroleum Institute Recommended Practice 545—Lightning Protection for Above Ground Storage Tanks. Grounding and lightning protection minimize risks during unloading and loading and operating procedures limit operations under certain conditions.

Comment RLA7-9

Natural Hazard-Triggered Technological Accidents (Natech) are recognized internationally as a unique class of incidents "that manifests itself when the natural and technological worlds collide." These accidents are initiated by a natural disaster, such as an earthquake, that leads to the release of hazardous materials. [*footnote: http://enatech.jrc.ec.europa.eu*] Europe's Joint Research Centre summarizes the particular challenges inherent in events of this magnitude and complexity:

One of the main problems of Natech accidents is the simultaneous occurrence of a natural disaster and a technological accident, both of which require simultaneous response efforts in a situation in which lifelines needed for disaster mitigation are likely to be unavailable, as they may have been downed by the natural disaster. In addition, hazardous-materials releases may be triggered from single or multiple sources in one installation or at the same time from several hazardous installations in the natural disaster's impact area, requiring emergency-management resources occupied with responding to the natural disaster to be diverted Moreover, the ongoing climate change predicted to result in an increase of hydro¬ meteorological events may in turn increase the likelihood of [Natech] accidents.

Natechs include the Indian Ocean Tsunami of 2004, the 2005 Katrina Storm Surge and the 2011 Great East Japan Earthquake and Tsunami and others. The 2011 Tohoku tsunami in Japan damaged 418 oil storage tanks and moved 157 of them. Sloshing of contents during the earthquake also caused oil to flow out over the tanks' floating roofs. [*footnote: http://www.earthquakespectra.org/doi/abs/10.1193/050713EQS120M?journalCode=eqsa*] Major tank farm incidents have involved "floating roofs becoming dislodged and jamming, with a resulting fire being attributed to sparks from the damaged roof being shaken violently." [*footnote: http://www.lightningsafety .com/nlsi_lls/Causes-of-Failures-in-Bulk-Storage*]

The director of the Pacific Northwest Seismic Center recently estimated that there is a 10-15 percent chance for a magnitude 9.0 earth quake over the next 50 [*footnote: http://wwww.seattletimes.com/seattle-news/science/the-really-big-one-get-ready-now-quake-experts-advise*] years. This equates to a 1 in 300 chance each year. The dEISs cite USGS figures from 2009 – a likelihood of 6-8 percent. The most recent seismic event near the project area was a magnitude 2.5 quake which occurred beneath Grays Harbor on November 13, 2015. [*footnote: http://pnsn.org/earthquakes/recent*]

Response RLA7-9

Draft EIS Chapter 3, Section 3.1.2, *What laws and regulations apply to earth resources and conditions?* and Section 3.1.3.1, *Information Sources*, outline the requirements that inform the design, review, and permitting of the proposed action. Refer to the Master Responses for Seismic Risk and Design Requirements and Earthquake Probabilities.

Comment RLA7-10

On a similar note, the dEISs give a figure for sea level rise of 24 inches by the end of the century, but Washington Sea Grant, for one, now provides probabilistic forecasts of sea level rise. [*footnote: https://wsg.washington.edu/about-wsg/staff/ian-miller/*] These include a range of possible sea level rise magnitudes and the calculated risks of each. This form of information is likely of greater utility for communities and managers than a single forecasted figure.

Response RLA7-10

Mean higher high water (MHHW) is reported as 10.11 feet on the mean lower low water (MLLW) vertical datum and 8.47 feet on the NAVD88 vertical datum at Aberdeen, Washington (Station 9441187).[1] Final EIS Chapter 6, Section 6.5.1.2*, Cumulative Impacts*, reflects addition of the following description: *The expected sea level change in the project area by 2050 could be as great as 48 cm (1.57 feet) (National Research Council 2012). Adding 1.57 feet to the current mean sea level tide predictions, the expected high water from tides occurring in year 2050 would be 4.51 feet + 1.57 feet = 6.1 feet above mean sea level (projected). Accounting for this increase in sea level, the project site, which has an average elevation of approximately 11 feet above mean sea level, will remain approximately 5 feet higher than the projected high tide level of 6.1 feet above mean sea level, in 2050.*

Comment RLA7-11

In our letter last May, we requested that the EIS determine what additional infrastructure, plans, procedures and equipment should exist to minimize damage to the environment from a tsunami. In the final EISs, please include a discussion of Natechs involving bulk oil storage and transfer facilities that were affected by tsunamis and other natural disasters - including earthquakes, floods, subsidence, or liquefaction. Please also discuss lessons learned as they may apply to Grays Harbor and storage the of Bakken and tar sands oils specifically. We also request that the final EIS address risks associated with climate change driven sea level rise over the next 50 years in combination with the increasing risk of extreme storm events.

Response RLA7-11

Draft EIS Chapter 3, Section 3.1, *Earth*, addresses risks related to geologic conditions in the study area, including earthquakes and related hazards such as tsunamis and liquefaction. To inform the risk of tsunamis at the project site, an updated tsunami model was completed and an updated assessment of tsunami risks specific to the project site is presented in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis.* Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how building codes, engineering design standards, and applicant mitigation would reduce impacts of earthquakes and related hazards.

Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, clarifies predictions of sea level change in the study area and potential for flooding at the project site. With sea level in the study area predicted to rise 1.57 feet by 2050, the project site will remain approximately 5 feet higher than the projected high tide. As such, it would not be subject to flooding during extreme storm events.

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[1] National Oceanic and Atmospheric Administration. 2016. *Tides & Currents Benchmark Datasheet for Station 9441187*. Available: http://tidesandcurrents.noaa.gov/benchmarks.html?id=9441187. Accessed: April 25, 2016.

Comment RLA7-12

The EISs correctly indicate that the most likely debris to impact the proposed storage tanks would be woody material like logs. However, past Natechs have also seen empty tanks colliding with fuller ones, vehicles colliding with tanks, empty tanks floating off of their foundations and drifting hundreds of meters away or colliding with and broaching containment dikes. In the final EIS, please discuss the possibility that, during a natural disaster, trains, tanks, vessels and vehicles (as well as logs or lumber) may impact and potentially rupture tanks containing oil or generate sparks that cause fires or explosions.

Response RLA7-12

Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis,* calculates debris forces based on guidance from the Federal Emergency Management Agency,[2] which was developed for structures that would provide vertical refuge for evacuees above the level of tsunami inundation. Factors used in this document were derived from laboratory simulations of impenetrable vertical walls. Tsunami-borne debris may not accumulate around a circular tank the same way it would against a vertical structure. Stiffness between debris and vertical structures would differ from stiffness between debris and circular tanks, and impact and damming forces would likely differ for the proposed facilities and evacuation facilities. Uncertainties also exist regarding the size and type of debris that would float over the berm surrounding the site. However, these uncertainties are accounted for in the tsunami analysis by applying a factor of safety of 1.3, as described in Appendix C.

Draft EIS Chapter 4, *Environmental Health and Safety*, acknowledges that incidents involving the release of crude oil could result in fires and explosions. The Draft EIS does not assume any single cause of such an incident but considers the potential for an event to occur as the result of any cause, including from natural disasters.

Comment RLA7-13

The waters of the California current connect Jefferson County with Grays Harbor. Many species travel along our shores and thrive in the wide diversity of intact habitats that comprise the Washington Coast, including those found within Olympic National Park, the Olympic Coast National Marine Sanctuary, several National Wildlife Refuges and the reservations of Coast Treaty Tribes. People have thrived here over decades and generations in communities built, in large measure, around an exceptionally productive marine environment that has long supported fishing, shellfish, crabbing, tourism and other local businesses.

In closing, thank you for this opportunity to comment on these proposals and the contents of the dEISs. We appreciate your time incorporating our comments into the final documents. Please email Environmental Specialist Tami Pokorny with any questions you may have at tpokorny@co.je:fferson.wa.us.

Sincerely,

David Sullivan, Chairman

Phil Johnson, Member

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[2] Federal Emergency Management Agency. 2008. *Guidelines for Design of Structures for Vertical Evacuation from Tsunamis.* FEMA-P646. Washington, D.C.

Kathleen Kler, Member

Cc: Governor Jay Inslee Co - Lead Agencies City of Hoquiam Administrator Brian Shay Department of Ecology Director Maia Bellon Department of Ecology SW Regional Direct Sally Toteff

Encls.

Response RLA7-13

Comment acknowledged.

RLA8, Marysville Fire District, Martin McFalls

Comment RLA8-1

November 18, 2015

Marysville Fire District 1094 Cedar Ave Marysville, WA 98270 Phone: (360) 363-8500 Fax: (360) 659-1382

Honorable Members of the Washington Congressional Delegation:

The Honorable Patty Murray, United States Senate

The Honorable Maria Cantwell, United States Senate

The Honorable Rick Larsen, U.S. House of Representatives serving the State of Washington

The Honorable Suzan DelBene, U.S. House of Representatives serving the State of Washington

The Honorable Jaime Herrera Beutler, U.S. House of Representatives serving the State of Washington

The Honorable Dan Newhouse, U.S. House of Representatives serving the State of Washington

The Honorable Cathy McMorris Rodgers, U.S. House of Representatives serving the State of Washington

The Honorable Derek Kilmer, U.S. House of Representatives serving the State of Washington

The Honorable Jim McDermott, U.S. House of Representatives serving the State of Washington

The Honorable David Reichert, U.S. House of Representatives serving the State of Washington

The Honorable Adam Smith, U.S. House of Representatives serving the State of Washington

The Honorable Denny Heck, U.S. House of Representatives serving the State of Washington

Shoshanna Lew, Deputy Assistant Secretary for Transportation Policy, Office of the Under Secretary for Transportation Policy, U.S. Department of Transportation

Dear Honorable Congressional Leadership and Washington Delegation,

As Fire Chief representing the Marysville Fire District Board of Directors, our first priority to the 78,000 citizens we serve is to see that their safety, quality of life and livelihood are sustained.

Proposed projects to develop oil export facilities that will significantly increase freight traffic on BNSF rail lines in our region will have adverse impacts on our communities and our aging transportation systems.

Negative impacts to our community include increased traffic congestion, higher risk of accidents, reduced levels of service, decreased ability to provide effective emergency response times, impacts on local commerce, and possible interference with local truck freight delivery systems also affecting the local economy.

While we are certainly supportive of job growth, the potential jobs from building and operating oil export facilities counties away from us brings no economic benefit for communities such as ours that would be left to deal with the negative impacts.

However, if the inevitable is to happen and we can assume increased future rail activity, we request that you authorize dollars to mitigate the adverse effects of rail traffic in general on safety, traffic flow and community quality of life. Furthermore, we request:

- BNSF be required to identify road improvement plans for grading, widening or otherwise provide crossings at intersections that would be impacted by rail traffic increases.
- Require the railroad to mitigate its impacts by funding the design and construction of these upgrades.
- Require the railroad to mitigate its impacts by funding related training costs of emergency personnel.
- Address grade separation issues.

On behalf of our citizens, we look forward to working with you as you consider this critical request.

Sincerely,

Martin McFalls, Fire Chief Marysville Fire District

Michael Stevens Board Chair, MFD

David DeMarco Chair, SCFPD #12

Gary Bontrager Vice Chair, MFD

Marilyn Sheldon Board Member, MFD

Rob Toyer Board Member, MFD

Donna Wright Board Member, MFD

Response RLA8-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts on local emergency service providers, described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action. Additionally, as noted in the revisions to Final EIS Chapter 4, Section 4.2, *Applicable Regulations*, a new rule, WAC 173-186, Oil Spill Contingency Plan—Railroad, has been finalized that establishes railroad oil spill contingency plan requirements, drill and equipment verifications that would be required of PS&P prior to operations. The mitigation measure presented in Draft EIS Chapter 4, *Environmental Health and Safety*, recommending that contingency planning by PS&P be completed will remain in place into the rule takes effect. Final EIS Chapter 4 has also been revised to include additional mitigation measure to address emergency response gaps. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

RLA9, Port of Grays Harbor, Gary G. Nelson

Comment RLA9-1

November 20, 2015

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

Re: Draft EIS Comments

To Whom It May Concern,

After reviewing the potential impacts and mitigation measures outlined in the Draft Environmental Impact Statements for the Westway and Imperium Terminal Services expansion projects, the Port of Grays Harbor respectfully submits the following comments for the outlined topics:

<u>3.12 Tribal Resources</u>

The DEIS states that potential unavoidable and significant adverse impacts were identified due to increased vessel traffic related to the projects that could increase the potential for conflict with fishing areas and access to fishing areas compared to the no-action alternative. The Port respectfully disagrees with this assessment, citing both historic vessel calls and the fact that the some of the DEIS's proposed mitigation measures are out of the control of the project proponents and the Port,

with neither having the authority to regulate commercial traffic in the Chehalis Navigational Channel.

Response RLA9-1

Vessels related to the proposed action would travel through usual and accustomed fishing areas in Grays Harbor. Draft EIS Chapter 3, Section 3.12.8, *Would the proposed action have unavoidable and significant adverse impacts on tribal resources?* concludes that under current and future conditions, this vessel traffic could restrict access to tribal fishing areas in the navigation channel and adjacent to Terminal 1. It acknowledges that because other factors besides vessel operations affect fishing opportunities—such as the number of fishers, fish distribution, timing, and duration of fish windows—the extent to which this vessel traffic would affect tribal fishing is difficult to quantify and that no mitigation measures would eliminate the possibility of impacts.

Although vessel traffic levels were higher prior to the 5-year period analyzed in Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, no tanker and tank barge traffic occurred in Gray Harbor from 1999 through 2006.[3] When looking at traffic volumes, it is important to consider the type and size of the vessel, draft, commodities, and origins and destinations in the port. The 5-year period (2008–2012) was selected to represent a period when traffic levels with vessels carrying liquid bulk commodities began to increase in Grays Harbor.

Comment RLA9-2

Jurisdiction over the safety and control of movement of vessels in the waters of Grays Harbor is with the Captain of the Port, 13th District, U. S. Coast Guard, Portland, Oregon. In addition, the District Engineer, Seattle District, Corps of Engineers, U.S. Army has jurisdiction over certain navigation aids and controls.

Procedures are already in place to announce vessel traffic arrivals and departures. It is the Grays Harbor Pilots standard practice to announce vessel arrivals on VHF Channels 13 and 16 via "Security" calls after boarding an inbound vessel on Grays Harbor Bar Range, in the vicinity of Buoy "GH". They announce their departures on VHF Channels 13 and 16 via "Security" calls after boarding an outbound vessel at the terminal and around the time of last line. These "Security" calls are made each time a pilot moves a vessel, including when departing anchor and shifting berths.

Response RLA9-2

Draft EIS Section 3.17.4.4, *Vessel Traffic Management*, describes the roles of the U. S. Coast Guard in establishing and enforcing navigational rules and vessel safety and of the U.S. Army Corps of Engineers in working with the Coast Guard to determine the navigation channel's physical characteristics. Final EIS Section 3.17.4.4 reflects the addition of the information provided by the commenter regarding standard practice for Grays Harbor Pilots announcing vessel traffic arrivals and departures on VHF Channels 13 and 16.

[3] Washington State Department of Ecology. 1999 to 2006. *Vessel Entries And Transits for Washington Waters 1999–2006. Spill Prevention, Preparedness and Response Program.* Available: https://fortress.wa.gov/ecy/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Spills&DocumentTypeName=Publication.

Comment RLA9-3

While every effort will be made notify tribal members of the vessel schedule and vessel movements, the Port cannot commit to adjusting the vessel schedule for fishing after already having a limited window to move vessels due to tides and weather.

Response RLA9-3

The mitigation measures propose that the applicant initiate a process between stakeholders and Quinault Indian Nation officials to discuss and propose additional mitigation measures to mitigate impacts on access to tribal treaty fishing areas as a result of vessels related to the proposed action still applies.

Comment RLA9-4

3.16 Rail and Vehicle Traffic:

Mitigation measures identified regarding Rail and vehicle traffic safety are also an area of concern as they are likely outside the control of the project proponent. As you know, the PSAP is a federally regulated utility and suggesting the project proponent can influence operating schedules and traffic delays are outside the purview and intent of the DEIS.

That being said, the Port of Grays Harbor does own and control the rail and Port Industrial Road within the Port's boundaries. The Port will work with the project proponents to ensure impacts to both existing tenants and vehicle traffic are kept to a minimum.

Response RLA9-4

Comment acknowledged.

Comment RLA9-5

3.17 Vessel Traffic:

The number of vessels expected from these projects, even in conjunction with existing vessel traffic, is still well below the numbers that used to call the Port and the other privately owned docks on Grays Harbor in the 1970's and 1980's.

Response RLA9-5

Refer to the discussion of historical vessel traffic in Section 3.17, *Vessel Traffic*.

Comment RLA9-6

The implementation of a formal Vessel Management System would be a costly and unnecessary burden to the maritime industry for the minimal amount of improved safety. Because there are only two pilots and vessel movements are done on high tides, ensuring vessel traffic is limited while a laden vessel is in the channel is routine for the duty pilot and should be left as a function of the Grays Harbor Pilots. An automatic identification system (AIS) antenna is already in place at Westport and is regularly monitored by the Merchant Exchange of Puget Sound, Merchant Exchange of Portland, PMSA and the Columbia River Steamship Association, amongst others. The Port of Grays Harbor Pilots and other stakeholders are committed to working with the U.S. Coast Guard, tug operators and

vessel agents via the Grays Harbor Safety Committee to draft specific procedures for escorting, tethering, and emergency maneuvering to control all vessels.

We thank you for the opportunity to comment on the DEIS. We would be happy to further discuss any of the mitigation measures as they relate to the Port of Grays Harbor should you have any questions or need additional information.

Regards,

Gary G. Nelson, Executive Director
Port of Grays Harbor

Cc: Sally Toteff
Southwest Washington Regional Director
Department of Ecology
PO Box 47775
Olympia, WA 98504-7775
stot461@ecy.wa.gov

Brian Shay
City Administrator
City of Hoquiam
609 8th Street
Hoquiam, WA 98550
bshay@cityofhoquiam.com

Response RLA9-6

Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*, describes vessel traffic management authorities and practices in Grays Harbor. Final EIS Section 3.17.4.4 reflects the addition of information related to the automatic identification system (AIS) antenna at Westport. The mitigation measure proposed in Section 3.17.7.1, *Applicant Mitigation*, to develop a vessel traffic management system is intended to improve situational awareness of vessel traffic in a consistent manner to reduce the risk of a vessel incident. The proposed mitigation measure would include the ability to schedule, track, and monitor vessel movements in the harbor and off the entrance to the harbor.

RLA10, Port of Olympia, George Barner, Jr.

Comment RLA10-1

My name is George L. Barner, Jr. from Olympia, Washington. And I'm here representing the citizens of Thurston County who have expressed to me the concerns they have with the proposed movement of crude oil trains through southern—the southwestern part of Thurston County. The proposed route comes out of Lewis County and Centralia and proceeds west along the Chehalis River.

And I've had conversations with members of the Chehalis Indian Tribe Tribal Council about their concern because we've already had a train derailment last year on the Genessee and Wyoming short line that runs from Lewis County through Thurston County along the Chehalis River toward Grays

Harbor. That train was carrying wheat, which is not threatening, but the same line is proposed to be used by the folks in the oil business who want to move crude oil through Lewis County into Thurston County and into Grays Harbor. It appears that this line is vulnerable to train derailments, and they're going to have to spend multimillions of dollars to upgrade this line to be able to handle oil trains if the Department of Ecology allows the establishment of terminals on the coast of Grays Harbor. So I'm here to register my concern.

In 2013, the Port of Olympia, with my fellow commissioner then seated as a commissioner, Sue Gunn and I passed a resolution against oil trains coming to Grays Harbor through Thurston County along this rail line. I'm concerned about the potential threat to the Chehalis River fisheries as well as the members of the Chehalis Confederated Tribes because of the threat to their lifestyle, their fisheries, and their tribe.

I think it's shortsighted for the Port of Grays Harbor to want to site three terminals in Grays Harbor to be able to handle this crude oil which precludes the opportunity for the Grays Harbor Port to be using this substandard rail line to be able to ship crude oil out of Grays Harbor Port.

Commissioner Gunn and I made a very reasonable request, and we asked the Port of Grays Harbor to consider—to reconsider their decision to be shipping crude oil out of the Grays Harbor Port because it seemed to me to be a very shortsighted decision to allow the citizens of Thurston County to be subjected to the potential hazard of—possibility of the potential for train derailments moving that product through the area of Thurston County where that rail line runs, and then it comes into Grays Harbor.

We were just simply asking them to reconsider their decision because it seemed to me that it was a very short, short-term decision to allow them to run oil train tanker cars through our county which threatened the citizens of Southwestern Thurston County in the area where that rail line is positioned to be able to be used by the Genessee and Wyoming Rail Line to allow trains to be threatening the habitat, the fisheries, the Chehalis Tribe tribal members, and the citizens of Southwest Thurston County who would be exposed to the risk of derailment by the use of the Genessee and Wyoming line to be—to be allowed to be used for the transport of crude oil coming out of Thurston County going into Grays Harbor and ignoring the fact that that community and the region didn't even get the benefits of the refining activities that would be important to be able to have employment from that crude oil being refined and thereby providing job-related amenities to be benefiting from that rail line.

It seems to me that there's too much of a threat to the citizens, the fisheries, the confederated tribe population, and the members of the general public who live along that rail line that would be threatened by the transport of oil. It just doesn't make sense to me that we would be allowing citizens, fisheries of the Chehalis River to be put at great risk if there was a derailment, and it just didn't make sense to me that that was a wise decision.

So my fellow commissioner, then Commissioner Gunn, and myself didn't agree with the posture of Grays Harbor to be used for that purpose, and we hope that they would be able to reconsider their decision to transport oil potentially creating the possibility of a risk by derailment because it's just too much of a threat to the citizens of Thurston County, Grays Harbor County, and the Chehalis Confederated Tribe to see that kind of threat be placed on the citizens of the Chehalis Tribe and the fisheries of Thurston and Grays Harbor County.

Response RLA10-1

Refer to the Master Response for the Purpose and Focus of the EIS.

RLA11, Skamania County Fire District #4, Timothy Young

Comment RLA11-1

The following comments are in response to Westway Terminal Company LLC and Imperium Terminal Services proposed expansion of existing bulk liquid storage terminals located at the Port of Grays Harbor Terminal 1: Skamania County Fire District #4 provides Fire Protection and Emergency Medical Services in a 45 square mile area at the west end of Skamania County. There are approximately 7 miles of BNSF Railway Company tracks in the District from the Clark - Skamania County line in the west to Smith-Cripe Rd in the east. Concerned over the potential impact of a Bakken Crude Oil Train fire on the residents of Skamania County Fire District #4, the District Board of Commissioners passed a resolution (attached) at the July 9 meeting requesting Senators Murray and Cantwell and Representative Herrera Beutler work immediately with The Pipeline and Hazardous Materials & Safety Administration, National Transportation Safety Board and the Federal Railroad Administration to stop Bakken Oil Train traffic through the District, Skamania County and the Columbia River Gorge at large. The resolution also calls for the concurrent development of Federal Legislation requiring that railroads, as a condition of transporting Bakken Crude Oil through the Columbia River Gorge, establish and demonstrate the capability to provide required Hazardous Materials Response including Fire Suppression of Bakken Crude Oil fires in the Columbia River Gorge. BNSF has historically operated a minimum of two Bakken Oil Trains per day through the District. Each train consists of an average of 100 cars. Each car contains 30,000 gallons of Bakken Crude Oil, with Bakken Crude Oil identified as a highly flammable hazard. The District and surrounding agencies do not possess sufficient resources including manpower, Class B Foam and water supply to extinguish Bakken Crude Oil fires resulting from accident or derailment with the exception of the smallest fires. The non-intervention tactic of allowing Bakken Crude Oil fires to burn out on their own presents a clear Fire and Life Safety danger to the residents of the District. This is compounded by the fact that approximately 75% (5 miles) of the BNSF tracks in the District are inaccessible by fire apparatus. Given the region's susceptibility to high winds, this exposes the District, Skamania County and the Columbia River Gorge at large to substantial wildland fire risk. It is contrary to the public interest to expand oil terminals with accompanying increases in oil train traffic until such time as the railroads establish and demonstrate the capability to provide required Hazardous Materials Response including Fire Suppression of Bakken Crude Oil fires in the Columbia River Gorge. Respectfully, Timothy W. Young Chairman Board of Commissioners Skamania County Fire District #4 10042 Washougal River Rd Washougal, WA 98671 Cell: 201-247-3361

Response RLA11-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Chapter 4
Tribes

The tribes listed in Table 4-1 submitted comments on the Draft EIS. These comments and responses to those comments are presented after the table. Master responses were developed to address commonly raised comments and are presented in Chapter 2, *Comment Themes and Master Responses*.

The responses refer to the Draft EIS unless information has been revised, in which case the Final EIS is specified.

Table 4-1. Comment Letters Submitted by Tribes

Number	Tribe
T-1	Columbia River Inter-Tribal Fish Commission, Babtist P. Lumley
T-2	Confederated Tribes and Bands of the Yakama Nation, Phil Rigdon
T-3	Confederated Tribes of the Warm Springs Reservation, Elmer Ward
T-4	Quileute Tribal Council, Naomi Jacobson
T-5	Quinault Indian Nation, Fawn R. Sharp
T-6	Quinault Indian Nation, President Sharp
T-7	Quinault Indian Nation, Tyson Johnston
T-8	Quinault Indian Nation, Kristen Boyles (EarthJustice)
T-9	Shoalwater Bay Indian Tribe, Douglas Davis

T1, Columbia River Inter-Tribal Fish Commission, Babtist P. Lumley

Comment T1-1

November 30, 2015

Via U.S. Mail and Online

Westway and Imperium Expansion Projects EISs
c/o ICF International
710 Second Street, Suite 550
Seattle, WA 98104
https://public.commentworks.com/cwx/westwayimperiumcommentform

RE: Draft Environmental Impact Statements for the Projects: Westway and Imperium (Renewable Energy Group) Expansion Projects

To Whom It May Concern:

Thank you for this opportunity to provide comments on the Draft Environmental Impact Statements (DEISs) for the Westway and Imperium Expansion Projects. These comments are provided at the

direction and on behalf of the Yakama, Warm Springs, Umatilla and Nez Perce tribes which formed the Columbia River Inter-Tribal Fish Commission (CRITFC) in 1977. CRITFC and its member tribes have been alarmed at the massive influx of fossil fuels being transported by rail through the Columbia River Gorge. These trains directly affect the lives of tribal people living, working, and exercising their treaty rights along the Columbia River. Similarly, we appreciate and support the Quinault Indian Nation's extensive and thorough comments filed November 24, 2015. We believe that while the Westway and Imperium projects are ultimately situated in Grays Harbor, Washington, with all full trains transiting the rail through the Gorge, the Columbia River tribes share many of the Quinault Indian Nation's concerns, therefore we incorporate by reference all comments of the Quinault Nation and add the following information.

Both DEIS documents analyze the project affects close to the terminus sites in Grays Harbor, and the PS&P rail from Centralia, while lightly acknowledging the rail transit in other parts of the state as the "extended" area. The DEIS notes that the PS&P line is "certain" and infers that all other transport is uncertain. We are certain that the only feasible transport route for full trains to Centralia will be the BNSF rail on the north side of the Columbia River Gorge. For a myriad of reasons, this is unacceptable and will result in unmitigatable impacts and risks to tribal treaty resources.

There are currently several projects in the region accepting crude-by-rail (CBR) shipments, and at least a dozen projects proposed and awaiting permits. Current CBR traffic in the Columbia River Gorge is estimated to be around twenty to twenty-four full unit trains per week. With each additional project, and each additional CBR train, the risks to the resources grows by a magnitude.

If all of the projects currently proposed are approved, the Columbia River Gorge, a regional jewel providing unique scenic, cultural, and recreational value, will be a fossil fuel rail pipeline funneling over 100 CBR trains per week. Ecology must analyze and weigh these effects when considering whether to approve these projects.

The risk of a train derailment and spill increases exponentially with each added CBR train. Rail capacity in the Gorge is currently very high, and adding more trains means more chances of catastrophic failure from derailments, train collisions, oil spill, and fire. From McNary dam at river mile 292 to Longview, Washington (river mile 67), the rail lines on both sides of the Columbia River run perilously close to the river, buffered only by cliff, rock, and/or highway. The image of the BNSF rail line [left] [Photo reviewed but not reproduced.] is a good example of how the rail lines the river. There is very little room for error on the part of the train, and often, very little room for first responders to access the site. In fact, it is likely that most accident sites along the Gorge will either be inaccessible to first responders or will be too far from any necessary equipment to contain a fire or oil spill such that impacts to aquatic and terrestrial resources will be inescapable. An oil spill, of either Bakken crude or Canadian bitumen, would be disastrous to the river's water quality and fish life. A short summary report of potential effects to aquatic resources (and reference list) was created by CRITFC and is attached. These risks are too great for Ecology to ignore.

Furthermore, much of the rail lines and bridges in the Gorge are aging and in desperate need of replacement and/or upgrading. In fact, many of the rail bridges, such as in the image [left], are nearly a century old. [Photo reviewed but not reproduced.] Such infrastructure upgrades are necessary and very expensive. The inadequacies of these systems paired with inadequate safety standards for rail tank cars creates unacceptable risks to the tribes and their resources. Current Department of Transportation (DOT) rules allow for substandard tank cars (DOT-111) to be used to carry crude, but even the newer, more "safe" tank cars (CPC-1232) and other enhanced safety

measures being considered under the U.S. DOT Tank Car Safety Rule are not protective enough. During 2015, there were six derailments of CBR trains with the CPC-1232 tank cars. The Columbia River tribes and the Quinault Indian Nation recently appealed the DOT rules. A copy of that appeal is attached.

As noted in the DEIS and other documents and reports issued by the State of Washington, rail traffic has increased dramatically with the introduction of CBR trains in late 2012. Many routes, including the Gorge, are nearing capacity and will be requiring expansion. Expanding rail would require, in many cases, infill into waterways, as well as creating more impediments to tribal treaty fishing access. In all of the images, including this image [left], tribal fishers had fishing nets just below the rail grade. [Photo reviewed but not reproduced.] At all of these sites, tribal fishers had to cross the rail line at great risk to their personal safety. In short, we do not want more rail traffic, and we certainly don't need risky rail traffic such as CBR, coal, or other hazardous fossil fuels.

As the DEIS notes, more trains on the rails means increased diesel emissions, which will add to the air pollution in the Columbia River Gorge. Currently, the Gorge experiences several days of stagnation during the winter and smoke during the July – September fire seasons. More emissions will add to this particulate load and continue to degrade resources in the Gorge area.

The Columbia River Gorge Commission and many cities and towns in the region have passed resolutions opposing these types of projects because the risks posed by these projects is too great a burden for these communities to bear, especially in light of the relatively little benefit to their economies or the region's economy. Copies of resolutions adopted by Portland, Oregon and Vancouver, Washington are attached.

The piecemeal approach to permitting all of these proposals is frustrating to those who will bear the burdens and risks the most. Ecology must thoroughly and comprehensively evaluate all aspects of the Westway and Imperium projects in conjunction with other projects proposed for the region. To not do so would be short-sighted.

Thank you for your time and consideration. If you have further concerns or questions, please contact me or my staff, Julie Carter, at 503-238-0667.

Sincerely,

Babtist P. Lumley

Executive Director

[Attachments]

Response T1-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the

proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

T2, Confederated Tribes and Bands of the Yakama Nation, Phil Rigdon

Comment T2-1

Brian Shay, City Administrator, City of Hoquiam City of Hoquiam 609 8th Street Hoquiam, WA 98550

Sally Toteff, Director Director, Southwest Regional Office Washington State Department of Ecology 300 Desmound Drive SE Lacey, WA 98503

Re: Yakama Nation Comments on Westway/lmperium Expansion Draft EIS

Dear Ms. Barnes:

The Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) received a letter from the City of Hoquiam and the Washington State Department of Ecology in regards to the proposed Westway and lmperium Expansion Projects. The proposed projects are within the Ceded Lands, and the Usual and Accustomed places of the Yakama Nation.

The Yakama Nation reserved rights in its treaty with the United States signed in 1855 and ratified by Congress in 1859 (12 Stat 951). The Treaty set forth that Yakama Nation shall retain certain rights and resources upon these lands and, therefore, it is with the assistance and backing of the United States Federal Government that Yakama Nation claims authority to protect traditional resources. You must seek consultation with the Yakama Nation's sovereign government before undertaking any action that might adversely impact the Yakamas ' territories and the rights reserved to the Yakamas on those lands.

Comments on Westway/lmperium Expansion Draft EIS

3.12 Tribal Resources

The Yakama Nation does not believe the Tribal Resources have been adequately addressed and the study area correctly defined. The area of potential effect (APE) needs to be expanded to include the point of origin, the route of transport, and the end location. You mention the “tribal resources that could be affected during routine rail transport..” in 3.12.1. The study area needs to include the length

of track that goes through the heart of Yakama traditional territory. There is a significant portion in which full loads will travel along the Columbia River. This area is not included the APE and should be as it includes many known culturally sensitive sites located along rail routes and within close proximity.

Response T2-1

Refer to the Master Response for Geographic Scope of the EIS for an explanation of how the extent of the study area was determined for different impacts associated with the proposed action.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment T2-2

4.3 Risk Considerations

This portion of the Draft EIS does not include the Columbia River, where a large portion of the transport route lies within the State of Washington. Full loads of crude oil will be transported along an area with ESA listed species and large culturally sensitive areas. Flow patterns or models for the Columbia River have not been established to forecast effects a possible oil spill.

Response T2-2

Refer to Response to Comment T2-1.

Comment T2-3

4.7 Impacts on Resources

Without properly identifying the study area and APE of the proposed project, a proper impact on resources study cannot be completed. The Yakama Nation has a treaty with the U. S. government, in

which resources are retained and guaranteed to the tribe. Any action that threatens these resources would have further complications other than to the environment.

Response T2-3

The EIS does not make a determination of significance related to tribal resources or treaty rights. The risks in the extended study area are addressed qualitatively for the reasons discussed in the Master Response for the Geographic Scope of the EIS. If an incident has the potential to or does affect tribal resources, the responsible party would be required to address impacts on tribal resources in compliance with all applicable local, state, and federal laws and regulations consistent with the regulations discussed in the Master Response for Liability and Responsibility for Incidents. Nonetheless, as noted in Final EIS Chapter 5, Section 5.6, *Would the proposed action have unavoidable and significant adverse impacts on rail and vessel transport in the extended study area?* implementation of the proposed action could increase the chance of an incident in the extended study area. Similar to existing conditions and the no-action alternative, these risks cannot be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts, including those that could affect tribal resources.

Comment T2-4

6.1 Cumulative Impacts

Without properly identifying the study area and APE of the proposed project, a proper cumulative impacts study cannot be completed. The transport and use of fossils oil would have significant greenhouse gas emissions, thus contributing to and exacerbating climate change. Increased traffic to other portions of the track and impacts from similar projects within the region have not been taken into account and need to be included in this study. Deaths from tribal members on the reservation and accessing fishing sites would be increased from additional train traffic.

Currently, we believe the current draft needs to expand the study area to include, the point of origin, transport route and end terminals, as well as the Columbia River, to ensure proper protection of and determine potential effects to resources. It is the policy of the Yakama Nation to preserve, protect, and perpetuate all significant natural and cultural resources. Only the Yakama Nation can determine what is significant to our Tribe.

If you have any questions or comments please feel free to contact Brady Kent at (509) 865-5121.

Sincerely,

Phil Rigdon, Superintendent Yakama Nation Department of Natural Resources

Response T2-4

Refer to Response to Comment T2-1 regarding how impacts in the extended study area were addressed in the Draft EIS. Final EIS Chapter 6, Section 6.5.1.2, *Air, Cumulative Impacts*, reflects the greenhouse gas emission estimates from rail and vessel transport related to the cumulative projects from the likely source to the furthest likely destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for more information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

T3, Confederated Tribes of the Warm Springs Reservation, Elmer Ward

Comment T3-1

November 30, 2015

Westway and Imperium Terminal Services Expansion Projects EISs c/o ICF International

710 Second Ave., Suite 550

Seattle, WA 98104

Re: Westway and Imperium Draft EISs

Dear Sirs,

The Confederated Tribes of the Warm Springs Reservation (CTWS) opposes the transport of fossil fuels and other potentially hazardous materials by train or vessels, or the storage of large quantities of such materials, in areas that could adversely affect its treaty protected rights and resources. The following comments articulate our concerns which underlie our opposition to the Westway and Imperium Terminal Services expansion. Plainly, there are unacceptable impacts to federally protected anadromous species. The CTWS reserved the right to harvest fish in the Treaty With the Tribes of Middle Oregon, signed June 25, 1855, (12 Stat. 963).

> Provided, also, that the exclusive right of taking fish in the streams running through and bordering said reservation is hereby secured to said Indians; and at all other usual and accustomed stations, in common with citizens of the United States, and of erecting suitable houses for curing the same; also the privilege of hunting, gathering roots and berries, and pasturing their stock on unclaimed lands, in common with citizens, is secured to them.

Actions which militate against the ability of the CTWS to exercise its right to engage in fisheries harvests are disfavored by the CTWS. Development actions which have the effect of disrupting the habitat of anadromous species or that interfere with the passage of such species to and from the Pacific Ocean are objectionable.

The federal courts have determined that a reserved treaty right to engage in a fisheries harvest includes the right to ensure that the habitats essential to the survival of the fish upon which the ability of treaty tribes to exercise their reserved Treaty rights depend are protected. In Kittitas Reclamation District v. Sunnyside Valley Irrigation District, 763 F.2d 1032 (9th Cir. 1985), the court ruled in favor of protection of fishery habitat in a case involving ". . . the collision of two interests: the Yakama Nation's interest in preservation of their fishing rights, and the Eastern Washington farmers' interest in preservation of water needed for crops in dry spring and summer." Kittitas, slip op. at 2. In Kittitas, a court-appointed water master had asked the district court for guidance when it became clear that diverting water for agricultural purposes would leave important salmon egg nests in spawning areas exposed, thus destroying those nests. The Ninth Circuit upheld the district court's directive to the water master to release more water to protect fish. It rejected the argument that the court had no jurisdiction to protect treaty-fishing rights. The right to take fish necessarily includes a right to the existence of a habitat, which will sustain such fish.

In U.S. v. Washington, 506 F. Supp. 187 at 203 (1980), the court stated:

. . . There can be no doubt that one of the paramount purposes of the treaties in question was to preserve to the tribes the right to continue fishing as an economic and cultural way of life. It is equally beyond doubt that the existence of an environmentally acceptable habitat is essential to the survival of the fish, without which the expressly, or -- reserved right to take fish would be meaningless and valueless. Thus, it is necessary to recognize an implied environmental right in order to fulfill the purposes of the fishing clause.

Response T3-1

Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, describes tribal resources in the study area. Section 3.12.2, *What laws, regulations, and treaty rights apply to tribal resources?* describes the laws, regulations, court orders, and treaties that apply to tribal resources, including treaty-reserved fishing rights, in the study area. The treaties and federal court cases referenced in the comment are included in this section and were considered as part of the regulatory framework for the Draft EIS analysis. Additional information is included in Draft EIS Appendix B, *Laws and Regulations*.

Section 3.12.4, *What tribal resources are in the study area?* acknowledges the treaty-reserved fishing, gathering, and hunting rights of the Quinault Indian Nation and the importance of access to traditional fishing and gathering areas. As described in that section, Quinault Indian Nation has treaty-reserved rights for salmon, halibut, lingcod, rockfish sablefish, sardines, and shellfish; a federal ruling in 1994 (*United States v. Washington, 873 F. Supp. 1422*) concluded that the Quinault Indian Nation's treaty-reserved rights extend to shellfish, for which they are entitled to 50% harvestable catch on most Washington State beaches. In addition to fisheries, the Draft EIS acknowledges Grays Harbor as a traditional gathering area for the Quinault Indian Nation where sweetgrass, cattail, other grasses, and willow are collected for weaving.

Section 3.12.5.2, *Proposed Action*, acknowledges that vessel activity related to routine operation of the proposed action could affect the ability of the Quinault Indian Nation to access tribal fisheries in Grays Harbor and to thereby meet their seasonal quotas. The EIS does not make a determination of significance related to tribal resources or treaty rights.

Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted in Chapter 4, mitigation would not eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant including those that could affect tribal resources. Final EIS Chapter 4, Section 4.7.1.7, *Tribal Resources*, reflects additional information on the potential impacts on tribal resources from an oil spill.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Comment T3-2

These expansions will directly result in water contamination. Oil train spills hit record levels in 2014. In 2013 more oil spilled from trains into rivers, lakes, and marine waters than in the previous forty years combined. Such a spill would have an immediate, catastrophic impact upon anadromous fish species in both their adult and juvenile stages. We cannot foresee how such a circumstance could be readily reversed or ameliorated.

Response T3-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident along the PS&P rail line. As noted in Chapter 4, the mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, including impacts on fish.

Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Comment T3-3

There is safety risk attached to transportation of oil by rail cars. Oil train fires, explosions and derailments. At least 10 crude oil trains have exploded recently in North America, including in July 2013 when an oil train accident in the province of Quebec killed 47 people. Between June 2011 and December 2013 a freight train derailed on average every 3.5 days in the Northwest region. There is no safe way to move oil by train: The tank cars that split open and burst into flames in Illinois in March 2015 were retrofitted to meet a higher safety standard than federal law requires according to railroad officials. The oil cars that derailed in West Virginia in February 2015, leaking oil into the Kanahwa River and burning down a house, were the newer 1232 cars that were supposed to be safer than the older DOT-111 models blamed for previous accidents. The rail traffic in the Gorge, quite near many tribal fishing sites, would put tribal fishermen, exercising their treaty rights, at risk.

Response T3-3

Final EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, reflect additional information about risks in the extended study area related to existing conditions, the no-action alternative, and the proposed action, individually and cumulatively. As noted, the proposed action could increase the likelihood of an oil spill, fire, or explosion in the extended study area. The potential consequences of such events are anticipated to be similar to those that could occur under existing conditions and the no-action alternative and generally similar to the types of impacts

described in Chapter 4, Section 4.7, *Impacts on Resources*. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, such an event could result in significant environmental impacts.

Comment T3-4

There is a concern regarding air pollution including diesel particulates and volatile organic compounds. There would be an enhanced level of diesel particulate pollution shown to increase the risk of cancer, asthma and other respiratory ailments.

Response T3-4

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, describe potential air impacts related to emissions from construction, onsite operations, and offsite transport related to the proposed action and cumulative projects, respectively, including an analysis of cancer risk from emissions of diesel particulate matter. The Final EIS sections have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment T3-5

There will be an increased cost to local governments in bolstering their respective levels of emergency preparedness and in responding to disasters occurring in the Columbia Gorge as a result of the transportation of oil tank cars along the Columbia River.

The proposed expansion puts at risk the public health safety and welfare of the members of the Confederated Tribes of the Warm Springs. Water contamination, oil tank car explosions, air pollution, the increased burden upon local governments due to the necessity of emergency preparedness, the adverse effects upon climate change and the proximity of oil tank cars to tribal fishermen are concerns which are not justified by the benefits which would be realized by a select few private interests. The Northwest is rapidly moving away from fossil fuels and towards renewable sources which meet the region's needs while responding to climate change.

Response T3-5

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport in the extended study area qualitatively.

T4, Quileute Tribal Council, Naomi Jacobson

Comment T4-1

Quileute Tribal Council La Push, Washington 98350-0279

Telephone (360) 374-6163 FAX (360) 374-6311

Received: November 24 ,2015

November 19, 2015

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

Re: Westway and lmperium expansion projects Draft EISs; rail terminals for petroleum in Grays Harbor

To the Project leads:

The Port of Grays Harbor is not just an industrial port, not just a shipping terminal. It lies within a major estuary, home to a complex ecosystem supporting fish and shellfish, part of our food chain--and supportive of the many other businesses that depend on the health of this ecosystem: commercial fisheries, tourism, and their satellite operations as just some examples. There are also homes and businesses adjacent to the rail lines and port facilities. This location is ill advised as an expansion facility for petrochemical transport for a number of reasons, but here are some:

- Because of the richness of the fisheries in the Grays Harbor area (and the whole Washington coast, which many commercially important species use in their migration);
- because of the number of economies dependent on them;
- because of the risk to drinking water;
- because of the cost and time involved in cleanup of material that is hazardous in nature--even though oil and gas are exempted from this category as a matter of law; and
- because of the public safety concerns in handling such a large volume of volatile and combustible material.

It is of concern whether a spill could be contained sufficiently to only impact the immediate area. Any major industry involved in the handling of petroleum knows spills happen despite the best precautions. Rail cars leave tracks, containment drums leak-the opportunity for “events” is ongoing and spills will occur. We are operating with aging infrastructure. The present protections and plans regarding derailment, spill, or prompt and effective cleanup, are insufficient to avoid huge safety concerns (e.g., fire) or economic loss (from contaminants) in such event, and ensuing irreparable harm to people's livelihoods. A huge risk is being placed on the local populace. For the above reasons, we do not support the Westway and lmperium Expansion Projects in Grays Harbor.

Quileute Tribe comments on Westway and lmperium expansion projects Page 2

Sincerely,

Naomi Jacobs, Chairwoman Quileute Tribal Council

Cc: U.S. Senator Patty Murray U.S. Senator Maria Cantwell U.S. Representative Derek Kilmer WA State Representative Steve Tharinger WA State Representative Kevin Van de Wege WA State Senator Jim Hargrove Hon. Fawn Sharp, President, Quinault Indian Nation Hon. Maria Lopez, Chairwoman, Hoh Tribal Business Committee Marine Resource Committees: North Pacific Coast, Grays Harbor County, Pacific County

Response T4-1

Refer to the Master Response for the Purpose and Focus of the EIS. For information about fisheries and the species found within the study area, refer to Chapter 3, Section 3.5, *Animals*. For information specific to tribal and commercial fisheries, refer to Section 3.12, *Tribal Resources*, and Section 3.17, *Vessel Traffic*. For a discussion of the social and economic costs of oil spills, refer to Chapter 7, Section 7.3, *Cost-Benefit Analysis*. For information about potential environmental impacts from oil spills, fires, and explosions, including risks to drinking water and human health effects, refer to Chapter 4, Section 4.7, *Impacts on Resources*.

T5, Quinault Indian Nation, Fawn R. Sharp

Comment T5-1

Comments include an uploaded cover letter and memo from the Quinault Indian Nation. Forty-five additional documents are referenced in the attached memo as supporting information provided on CDs, which were mailed to Ecology Director Maia Bellon, Hoquiam City Administrator Brian Shay, and Sally Toteff by U.S. Mail on November 30, 2015.

Quinault Indian Nation

PO Box 189 Taholah, Washington 98587

Telephone (360) 276-8211

November 30, 2015

Maia Bellon, Director

Washington State Department of Ecology

P.O. Box 47600

Olympia, WA 98504-7600

Brian Shay, City Administrator

City of Hoquiam

609 8th Street,

Hoquiam, WA 98550

Via Email and U.S. Mail

Re: Westway and Imperium Oil Terminal Projects

Dear Director Bellon and Mr. Shay:

The Quinault Indian Nation requests you deny the substantial development permits applied for by Westway Terminal Co. LLC and Imperium Terminal Services for two crude-by-rail terminal projects proposed in Grays Harbor based on unacceptable risks to and impacts on Washington's public trust resources.

The Grays Harbor ecosystem provides extraordinary ecological benefits and services to Washington's citizens, including members of the Quinault Indian Nation. Your agencies may and should rely on the Public Trust Doctrine to protect these ecological benefits and services now, and for future generations. Your agencies must also invoke the Public Trust Doctrine to address the direct and cumulative impacts of global climate change. Attached please find the Quinault Indian Nation's memorandum on use of the Public Trust Doctrine as a basis to deny permits to the proposed Westway and Imperium crude-by-rail oil terminal projects. This letter and memorandum have also been transmitted online to become part of the DEIS comment file.

As you know, 2015 has been an exceptionally difficult year with closures and postponements on salmon and razor clam fisheries throughout the Grays Harbor region. These closures are having a severe impact on tribal, commercial and recreational fishing interests. The Quinault Nation's recent closure of the coho fishery was absolutely necessary, but occurs at great cost. These closures also have secondary affects, sapping the vitality of the Grays Harbor local economy. Global climate change has already begun to directly impact the Quinault Indian Reservation. On March 26, 2014, the Quinault Indian Nation declared a state of emergency due to a breach in the Taholah seawall that caused flooding and destruction of residential and commercial properties. On January 5, 2015 we again declared an emergency as torrential rains caused flooding, landslides, culvert failures and road closures around the Reservation, including closure of the main highway to Taholah.

We believe these extreme sea level events and intensified storm systems to be a direct result of global climate change, a long-term crisis of the first order that cannot be ignored. While we may not understand the full extent to which climate change has contributed to the 2015 drought, we do take heed that this year has been described as a “dress rehearsal” for climate change. As we are obliged to do as a government of and for our people, we look to the future, and are beginning to take action. As one example, the Quinault Nation has launched the development and funding of a master plan to relocate the lower portion of Taholah to ensure the safety of the 25% of the village population at risk of losing their homes and businesses to sea level rise and extreme flood events.

As you can see, climate change is already causing significant problems on Washington's western coast. I offer this information in order to make two points.

First, it is absolutely essential that Washington's governments take action to slow and reverse the damage that climate change holds for the future. To do this, we must reduce and eventually eliminate the use of fossil fuels. It is imperative that Washington reject the proposition that its railways, ports and navigable waters are available as conduits to transport the very carbon-based products that, when combusted, will contribute to the degradation of our resources. Yes, we are but one state among many that has the potential to facilitate transfer. But we must do what we can. In so doing, we will provide leadership and example to other states and communities confronting similar proposals to act as carbon conduits.

Second, we must preserve the resilience of our coastal resources so that today's citizens and future generations may continue to use them. This means avoiding unnecessary damage and risk of damage that is posed by oil terminals in Grays Harbor.

The enclosed memorandum and attachments document the public trust value of Grays Harbor and its aquatic resources. The memorandum also discusses how the Washington laws that you administer encompass and promote the Public Trust Doctrine. Your agencies are responsible for making decisions about shoreline uses that in turn impact navigable waters, fisheries, migrating and resident birds and other aquatic resources, as well as the commerce and recreation dependent on

those resources. As such, you have an obligation as public trustee to reject the Westway and Imperium oil terminals proposals.

Thank you for your consideration.

Yours very truly,

Fawn R. Sharp, President

Quinault Indian Nation

cc: Sally Toteff, Regional Director, SWRO

Diane Butorac, Regional Planner, Southwest Region

Gordon White, Program Manager, Shorelands and Environmental Assistance

Tom Laurie, Tribal Liaison

Tom Young, AAG

Jack Durney, Mayor

Steve Johnson, City Attorney

Response T5-1

Comment acknowledged. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Comment T5-2

The Public Trust Doctrine and the Westway and Imperium Oil Terminal Proposal DEISs

Prepared by Rachael Paschal Osborn, Attorney at Law

November 25, 2015

1. Introduction.

The Westway Terminal Company LLC (Westway) and Imperium Renewables, Inc. (Imperium) oil terminal proposals (Proposals) pose a wide range of impacts and risks to Grays Harbor. *[Footnote: Renewable Energy Group, Inc. headquartered in Ames, Iowa acquired Imperium Renewables, Inc. in August 2015, including its 100-million gallon biodiesel refinery and terminal operations at the Port of Grays Harbor.]* This memo discusses the State of Washington's duty and authority to address these problems Proposals through application of the Public Trust Doctrine.

The Public Trust Doctrine is an ancient law that protects public interests in navigation, commerce and fisheries relating to shorelines and navigable water bodies. It is used regularly, including by Washington courts, to protect modern public values in these resources, including recreation and environmental quality. The Public Trust Doctrine is linked with the Shoreline Management Act (SMA), and as such must be considered and utilized by the agencies that implement SMA provisions. Importantly, the Public Trust Doctrine operates as a shield to regulatory takings claims when agencies deny permits for shoreline development.

The Public Trust Doctrine can also operate to deny the Proposals based on their contribution to greenhouse gas emissions that in turn are causing climate change impacts to Grays Harbor's traditional public trust resources. These impacts including sea level rise, ocean acidification, coastal flooding and erosion, and the consequent loss of fisheries and wildlife habitat.

Grays Harbor serves as a commercial and recreational fishing resource as well as providing unique and important wildlife habitat. It deserves and requires protection under the Public Trust Doctrine. The Westway and Imperium oil terminal Proposals will harm public trust resources and should therefore be denied.

2. Origins of the Public Trust: The Washington Constitution and Common Law.

The Public Trust Doctrine has existed in Washington since statehood in 1889. In 1987, the Washington Supreme Court explicitly recognized that the Public Trust Doctrine applies to Washington's navigable waters. *[Footnote: Caminiti v. Boyle, 107 Wn.2d 662 (1987).]* The "doctrine reserves a public property interest, the jus publicum, in tidelands and the waters flowing over them, despite the sale of these lands into private ownership." The state cannot give away or abdicate this public property interest. *[Footnote: Esplanade Properties LLC v. City of Seattle, 307 F.3d 978 (2002).]* Further, private parties may not make use of public trust resources in a way that substantially impairs the public's interest in those resources. *[Footnote: Esplanade Properties LLC v. City of Seattle, 307 F.3d 978 (2002).]* The Public Trust Doctrine imposes a duty on state governments and their agencies to protect specific public resources. *[Footnote: See Section 3.A below.]*

In Washington, the Public Trust Doctrine protects multiple public uses of navigable waters.

> Historically, the trust developed out of the public's need for access to navigable waters and shorelands, and thus the trust encompassed the right of navigation and fishery. . . . Recognizing modern science's ability to identify the public need, state courts have extended the doctrine beyond . . . navigational and commercial fishing rights to include 'incidental rights of fishing, boating, swimming, water skiing, and other related recreational purposes . . . *[Footnote: Orion Corp. (citations and footnotes omitted).]*

The Public Trust Doctrine also functions to protect wildlife and habitat. In Washington, the courts have utilized the Public Trust Doctrine to prevent tidelands development in Padilla Bay in Skagit County, and found that a San Juan County ban on jet skis was consistent with the public trust duty to protect wildlife in the waters of the San Juan Islands. *[Footnote: In other states, wildlife has also been a focus of public trust protections. In a case involving proposed fill of tidelands in the Tomales Bay estuary in northern California, the Court held that "one of the most important public uses of the tidelands—a use encompassed within the tidelands trust—is the preservation of those lands in their natural state, so that they may serve as ecological units for scientific study, as open space, and as environments which provide food and habitat for birds and marine life, and which favorably affect the scenery and climate of the area." Marks v. Whitney, 491 P.2d 374, 380 (1970). When Virginia sought damages for an oil spill cleanup in Chesapeake Bay, a federal court held that "[u]nder the Public Trust Doctrine, the State of Virginia and the United States have the right and duty to protect and preserve the public's interest in natural wildlife resources. Such right does not derive from ownership of the resources but from a duty owing to the people." In re Steuart Transportation Co., 495 F.Supp. 38 (U.S.D.C. E. VA, 1980). The California courts utilized the public trust to prevent impairment of Mono Lake because of its importance as a stop on the Pacific Flyway for millions of migratory birds. National Audubon Soc'y v. Superior Court, 658 P.2d 709 (CA 1983).]*

The Public Trust Doctrine is an evolving legal tool and Washington courts have expanded its scope and application over time to meet changing public needs.

Washington's Public Trust Doctrine is "partially encapsulated" in the Washington State Constitution. *[Footnote: Rettkowski, 122 Wn.2d 219 (1993); Caminiti, at 669, citing Wilbour v. Gallagher, 77 Wn.2d 306, 316 (1969); Utter, Robert F. and H.D. Spitzer, The Washington State Constitution: A Reference Guide, at pp. 212-17 (2002).]* Article XVII, Section 1, asserts public ownership over all navigable waters of the state, including harbors, rivers and lakes. *[Footnote: WA Const. Art. XVII, Sec. 1. The Public Trust Doctrine derives also from the Equal Footing Doctrine, which vested ownership and sovereign authority over navigable waterways at the time Washington entered the union of the United States. Orion Corp., 109 Wn.2d at 639.]* This public ownership is the source of the public right to utilize navigable waters, including bedlands, tidelands, shorelands, and navigable inland waterways *[Footnote: Wilbour v. Gallagher; Caminiti v. Boyle.]* Grays Harbor and the Chehalis River, along with Washington's outer Pacific coast, are navigable waterways and protected for the public under Washington's Constitution.

3. Statutory Foundations of Washington's Public Trust Doctrine.

"The heart of the Public Trust Doctrine . . . is that it imposes limits and obligations on governments." Prof. Charles Wilkinson, The Public Trust Doctrine in Public Land Law, 14 U.C. Davis L. Rev 269, 284 (1980)

A. The Department of Ecology has direct duties to protect public trust resources.

The Shoreline Management Act (SMA) encompasses the Public Trust Doctrine. Through the SMA, and other statutes, particularly the Department of Ecology's enabling statute *[Footnote: In enacting the Department of Ecology's enabling statute, RCW Ch. 43.21A, the State Legislature has adopted a policy that mirrors the state's public trust duty to protect the public interest in natural resources. "[I]t is a fundamental and inalienable right of the people of the state of Washington to live in a healthful and pleasant environment and to benefit from the proper development and use of its natural resources." Acknowledging inevitable growth in population and industrial and economic activities, it is the policy of the state to "plan, coordinate, restore and regulate the utilization of our natural resources in a manner that will protect and conserve our clean air, our pure and abundant waters, and the natural beauty of the state." RCW 43.21A.010. "In recognition of the responsibility of state government to carry out the[se], policies", the State Legislature created the Department of Ecology and designated it as the agency authorized and obligated to implement water, air, and other environmental programs, including the Shoreline Management Act. RCW 43.21A.020]* and the State Environmental Policy Act (SEPA) and associated resources.

[Footnote: The State Environmental Policy Act, or SEPA, also codifies public trust principles, including that "each person has a fundamental and inalienable right to a healthful environment . . ." RCW 43.21C.020(3). See also RCW 43.21C.020(2). To fulfill this right, the State Legislature has imposed on all agencies of the state, including Ecology, a duty to use all means to:

a. *Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;*
b. *Assure for all people of Washington safe, healthful, productive, and aesthetically and culturally pleasing surroundings;*
c. *Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;*
d. *Preserve important historic, cultural, and natural aspects of our national heritage;*
e. *Maintain, wherever possible, an environment which supports diversity and variety of individual choice;*
f. *Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and*

g. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.]

Pursuant to these policies, Ecology possesses substantive authority to deny project permits based on significant adverse environmental impacts that cannot reasonably be mitigated. WAC 197-11-660(f). SEPA, in its policies and substantive authority, provides a mechanism by which Ecology fulfills public trust duties to protect the common interests of the public in Washington's navigable waters Statutory language is replete with provisions that embody and reflect public trust principles. A Washington Court recently held that Ecology's enabling statute, while not establishing a statutory duty, does provide evidence of the State Legislature's view of the people's rights retained under the State Constitution. *[Footnote: Foster v. Wash. Dep't of Ecology, King Co. Sup. Ct. Cause No. 14.2.25295-1 SEA, Order Affirming the Dept. of Ecology's Denial of Petition for Rule Making at pp. 8-9, citing Washington State Constitution, Article 1, Sec. 30.]* SEPA policies provide similar evidence of the retained rights of Washington's citizens to have a healthful environment.

Washington courts have fully addressed the relationship between the Public Trust Doctrine and the SMA. *[Footnote: As discussed in Section 3.B(c) below, the courts have rejected delegation of public trust duties to Ecology via water resources permitting statutes. These cases did not address Ecology's public trust duties under the SMA.]* The courts do not lightly invoke the Public Trust Doctrine, but will do so when threats to public resources are clear. Courts have expressly used the Public Trust Doctrine to reject development permits, or support local legislation, to eliminate threats to Lake Chelan, Padilla Bay, Elliott Bay, the waters surrounding the San Juan Islands, and Eagle Harbor.

Importantly, as discussed more fully below, Washington courts have utilized the Public Trust Doctrine to reject constitutional "takings" claims arising out of denial of substantial development permits under the SMA.

B. The Shoreline Management Act manifests public trust duties to protect Grays Harbor resources.

a. The SMA reflects public trust principles.

The Court in *Caminiti v. Boyle* expressly adopted the public trust into Washington law, acknowledging that the doctrine had applied to Washington's shores and tidelands since no later than statehood. *[Footnote: Caminiti, 107 Wn.2d at 669.] Caminiti* involved the state Aquatic Lands Act, but several subsequent court decisions have examined the relationship between the Shoreline Management Act, RCW Ch. 90.58 (SMA), and the Public Trust Doctrine, including *Orion Corp. v. State*, *Weden v. San Juan County*, *Esplanade Properties v. Seattle*, and *Samson v. Bainbridge Island*. These cases are discussed below.

As the Courts have noted, the SMA's policies enunciate explicit public trust principles: "This policy contemplates protecting against adverse effects to the public health, the land and its vegetation and wildlife, and the waters of the state and their aquatic life, while protecting generally public rights of navigation and corollary rights incidental thereto." *[Footnote: RCW 90.58.020.]*

The SMA's findings direct Ecology and local government to follow a hierarchy of uses for state shorelines that promote environmental protection:

1) Recognize and protect the statewide interest over local interest;

2) Preserve the natural character of the shoreline;

3) Result in long term over short term benefit;

4) Protect the resources and ecology of the shoreline;
5) Increase public access to publicly owned areas of the shorelines;
6) Increase recreational opportunities for the public in the shoreline;
7) Provide for any other element as defined in RCW 90.58.100 deemed appropriate or necessary.

While SMA policy acknowledges the value of shoreline-dependent development, including ports, these uses operate within the envelope of a preference hierarchy that emphasizes protection of the natural character, ecology and public use of shorelines. *[Footnote: Undefined.]* These statutory preferences reflect protected trust uses, i.e., public rights of navigation, fishing, boating, recreational purposes, and environmental quality.

And, this statutory hierarchy of preferences is where Washington courts have located the symmetry between the Shoreline Act and public trust principles. The Orion Court recognized that the SMA established a regulatory scheme, then observed that

> …trust principles are reflected in the SMA's underlying policy, which contemplates 'protecting against adverse effects to the public health, the land and its vegetation and wildlife, and the waters of the state and their aquatic life, while protecting generally public rights of navigation and corollary rights incidental thereto. [*Footnote: Orion Corp., at FN 11, citing Portage Bay-Roanoke Park Comm'ty Coun. v. Shorelines Hearings Bd., 92 Wn.2d 1, 4 (1979) (quoting RCW 90.58.020).]*

In *Esplanade Properties*, the Ninth Circuit explained:

> The doctrine is also reflected in Washington's Shoreline Management Act ("SMA"), adopted in 1971. Following a long history of tideland privatization, "the Washington legislature found that the SMA was necessary because 'unrestricted construction on the privately owned or public owned shorelines ... is not in the best public interest. *[Footnote: 307 F.3d at 985-86 (citations omitted).]*

b. Ecology and Hoquiam have an obligation to implement the Shoreline Management Act in a manner that promotes and does not destroy or impair the public trust.

The State Legislature is the trustee of Washington's public trust resources, and the Department of Ecology (Ecology) and City of Hoquiam (City), as agents of the state with the power to implement the Shoreline Management Act and to otherwise regulate trust resources, are therefore encumbered by public trust obligations. *[Footnote: Foster, supra; see also Blumm & Wood, The Public Trust Doctrine in Environmental and Natural Resources Law at pp.5-6 (Carolina Press, 2d ed. 2015), citing, Ctr. For Biological Diversity v. FPL Group Inc., 83 Cal.Rprt.3d 588 (2008).]* This is a substantial duty, because the decisions made by Ecology and the City relating to the Westway and Imperium oil terminal proposals will potentially impact every recognized public trust use of Grays Harbor resources. These uses include the Harbor's navigability, its use for recreation, the viability of habitat necessary for fisheries, shellfisheries, and wildlife (including migratory birds), and water quality *[Footnote: "The public trust is a dual concept of sovereign right and responsibility. . . . The trust, in the Court's simplest terms, 'requires the government of the State to preserve such waters for the use of the public.'" In re Waiahole Ditch, 9 P.3d 409, 447, 448 (2000), citing* Illinois Central Railroad v. Illinois, *146 U.S. 387, 453 (1892). "Thus, the public trust is more than an affirmation of state power to use public property for public purposes. It is an affirmation of the duty of the state to protect the people's common heritage of streams, lakes, marshlands and tidelands, surrendering that right of protection only in rare cases when the abandonment of that right is consistent with the purposes of the trust." National Audubon Soc'y v. Superior Court, 658 P.2d at 723-24.]*

The essence of Ecology and the City's trust duties derive from the judicially recognized interplay between the Public Trust Doctrine and the Shoreline Management Act. Just as Ecology has a duty to follow statutory law, it must also make its decisions in view of and consistent with constitutional and common law parameters. Ecology recognizes this, stating on its "shoreline management" webpage that "[p]rotection of the trust is a duty of the State, and the Shoreline Management Act is one of the primary means by which that duty is carried out. The doctrine requires a careful evaluation of the public interest served by any action proposed." *[Footnote: Dept. of Ecology, The Public Trust Doctrine, website at www.ecy.wa.gov/programs/sea/sma/laws_rules/public_trust.html.]* The City of Hoquiam also recognizes these public interests in its Shoreline Management code. *[Footnote: City of Hoquiam Municipal Code, Ch. 11.04.020, at http://cityofhoquiam.com/code/Hoquiam11/Hoquiam1104.html#11.04.]*

The Public Trust Doctrine, as a constitutional requirement enforced primarily by the judiciary, must be a consideration in the agency decision process. Washington courts have found that Article XVII, Section 1 of the State Constitution requires the state, through its administrative agencies, to protect trust resources under their administrative jurisdiction. "The state has a constitutional obligation to protect the public's interest in natural resources held in trust for the common benefit of the people of the state." *[Footnote: Foster, supra, at pp. 7-8, citing Wash. Geoduck Harvest Assn. v. Wash. Dept. of Natural Resources, 124 Wn.App. 441, 447-48 (2004).]*

With respect to Hoquiam's public trust duties, it follows that, as an entity implementing the Shoreline Management Act, the City's decisions will affect public trust resources. While a plurality of the Washington Supreme Court rejected a local duty to protect public trust resources *[Footnote: Biggers v. City of Bainbridge Island, 162 Wn.2d 683 (2006)],* the Shoreline Act's express and de facto delegation of public trust duties to Hoquiam requires that the City act in a manner that does not impair public trust resources. Washington courts have scrutinized and upheld local legislation as consistent with the Public Trust Doctrine, including San Juan County's ban on personal watercraft and the City of Bainbridge Island ban on private docks. *[Footnote: Weden v. San Juan County, 135 Wn.2d 678 (1998); Samson v. City of Bainbridge Island, 149 Wn.App. 33 (Div. 2 2009).]*

Ecology's duty to consider and apply the public trust is not supplanted by statutes.

While there is symmetry between the Shoreline Act and the Public Trust Doctrine, and both reinforce principles of natural resource protection, the doctrine is not superfluous. As courts have recognized, "The doctrine itself is reflected in the SMA, but is not superseded by it . . . "

Further, cases involving the state's water right permitting statutes are not relevant to Shoreline Act decisions. In three water rights appeals, Washington courts have declined to apply the Public Trust Doctrine, stating that the doctrine does not serve as an independent source of authority to make regulatory decisions relating to water resources. *[Footnote: Rettkowski, 122 Wn.2d at 232; R.D. Merrill v. PCHB, 137 Wn.2d 118, 134 (1999); Postema v. PCHB, 141 Wn.2d 68 (2000).]* All three cases involved enforcement and permitting of water rights, and must be read in context.

In making these decisions, there is no credible argument that courts were repudiating or overturning decisions applying the Public Trust Doctrine in the context of shoreline or aquatic lands management. In executing its duties and decisions under the SMA, Ecology is obligated to act in conformity with public trust duties. "[T]he public trust is more than an affirmation of state power to use public property for public purposes. It is an affirmation of the duty of the state to protect the people's common heritage of streams, lakes, marshlands and tidelands. . . . " *[Footnote: Nat'l Audubon Society v. Superior Court, 658 P.2d 709 (1983).]*

When addressing a conflict between public trust uses, courts choose to protect larger public interests.

When confronted with conflicts between public trust uses, Washington courts focus on protection of public and environmental values. Here, access to and use of Grays Harbor by oil barges and vessels derives from the Public Trust Doctrine, i.e., the public right to navigate on and make commercial use of navigable waters. When confronted with a conflict between multiple public trust uses, Washington courts have chosen in favor of protection of larger public interests.

Washington cases offer two explicit examples. In Weden v. San Juan County, the Washington Supreme Court found that a local ban on operation of motorized personal watercraft in the waters surrounding the San Juan Islands did not conflict with and was consistent with the Public Trust Doctrine, stating that "it would be an odd use of the Public Trust Doctrine to sanction an activity that actually harms and damages the waters and wildlife of this state." *[Footnote: Weden v. San Juan County, supra.]* In Samson v. City of Bainbridge, the Court of Appeals found that the city's ban on private docks promoted public trust interests in navigation and recreational use of the harbor.*[Footnote: Samson v. City of Bainbridge, supra.]*

Navigation interests, i.e., boating and private docks, were alleged as uses requiring public trust protection in these cases. The courts found that where there was a conflict, interests in navigation did not "trump" the larger public need for environmental protection. Thus, although the Public Trust Doctrine protects the right to navigate on navigable waters, it does endorse a right to navigate at the cost of other public trust values.

c. The Public Trust Doctrine operates to shield agency action to deny permits for activities that will injure public trust resources.

One important element of the Public Trust Doctrine is the shield it provides when agencies take action to protect trust resources. Should the Department of Ecology and City of Hoquiam deny permits to the Westway and Imperium oil terminals on the basis of harm to trust resources, the Public Trust Doctrine is available as a defense to subsequent Fifth Amendment takings or other constitutional claims.

In *Orion Corp. v. State and Esplanade Properties v. Seattle*, Washington courts held that the public trust attached to the subject tidelands at statehood. Therefore, developers who sought SMA substantial development permits in order to dredge and build residential properties on those tidelands "never had the right" to do so and could not prevail in their takings claims against the state and local agencies that denied the permits. *[Footnote: Orion Corp., supra; Esplanade Properties, supra.]*

About 60% of Washington's tidelands have been sold into private ownership, but this fact did not trouble the courts. In other words, that other developers and the state itself have engaged in past actions that harm trust resources does not undermine or eliminate the state's power and duty to protect such resources in the present and future. With respect to the developer's takings claims, the Orion court held:

> Because title in and sovereignty over Washington's tidelands and shorelands vested in the state upon admission into the Union, the Public Trust Doctrine applies to Orion's Padilla Bay tidelands. . . . [P]rior to the adoption of the SMA, Orion's property was burdened by the Public Trust Doctrine. . . . Therefore, Orion had no right to make any use of its property that would substantially impair the public rights of navigation and fishing, as well as incidental rights and purposes recognized previously by this court. . . . Orion never had the right to dredge and fill its

> tidelands, either for a residential community or farmlands. Since a "property right must exist before it can be taken," neither the SMA nor the SCSMMP effected a taking by prohibiting Orion's dredge and fill project. *[Footnote: Orion Corp., 109 Wn.2d at 639 (citations omitted).]*

Esplanade Properties relied on *Orion*, and went further in finding that Washington's Public Trust Doctrine is a viable defense in a claim of regulatory takings under the Fifth Amendment of the U.S. Constitution. Specifically, the Court found that Washington's Public Trust Doctrine, as a "background principle of state property law" restricting certain uses of property, shielded the state from a federal regulatory takings claim. *[Footnote: 307 F.3d at 986-87, citing Lucas v. South Carolina Coastal Council, 112 S.Ct. 2886 (1992). See also In Re Waiahole Ditch, 9 P.3d at 494-95 (surveying cases regarding intersections between the Public Trust Doctrine and regulatory takings claims).]*

The need to protect public trust resources of Grays Harbor provides Ecology and Hoquiam with a valid and powerful defense to any claim of an entitlement to transport oil.

4. Grays Harbor is a critically important public trust resource.

Grays Harbor is a uniquely rich and ecologically diverse waterbody, because of both physical and biological attributes. As such, it is a public trust resource that merits the highest order of protection by the State of Washington and City of Hoquiam.

Gray Harbor Geography. Grays Harbor is a type of estuarine bay called a "ria," a partially inundated unglaciated river valley that includes a wide areal expanse and a narrow mouth. As such it is closely connected with the several rivers that empty into it, including the Chehalis, Humptulips, Wiskhah, Johns, Elk and Hoquiam Rivers. All of these rivers are subject to tidal influence, contributing to the important mix of salt and freshwater that supports a highly diverse and productive ecosystem. *[Footnote: Resource Dimensions at p. 12.]*

Also connected to Grays Harbor is the extraordinary Chehalis River Surge Plain, a 3,000-acre tidally influenced wetland area comprising an unusual mixed salt and freshwater ecosystem. *[Footnote: See DEIS at p. 3.3-15 et seq.]* Designated as a Natural Area Preserve by the Washington Department of Natural Resources *[Footnote: Wash. Dept. of Natural Resources, http://www.dnr.wa.gov/chehalis-river-surge-plain-natural-area-preserve],* this area contains the largest and best quality tidal surge plain wetland in the state, including sloughs that shelter young salmon and other fish. *[Footnote: Fletcher, Sandell, and McAninch, Lower Chehalis River and Surge Plain Fish Use Assessment (WFC, May 2015) at http://wildfishconservancy.org/projects/lower-chehalis-river-and-surge-plain-fish-use-assessment/WFC.lowerchehalisriverfishuseassessmentreport5.2015.final1.pdf.]* The surge plain supports both a variety of birds and fish and important vegetation communities.

Several rivers discharge into Grays Harbor draining both the Olympia Mountains to the northwest, and the Cascade Mountains to the west, bringing a substantial amount of sediment into Grays Harbor. As a result, much of the Harbor (excluding its navigation channel) is quite shallow, only 20 feet deep in most of its 900 square mile areal extent. *[Footnote: Army Corps of Engineers, Record of Decision, Grays Harbor Navigation Channel (9-3-14). To maintain a commercial navigation channel of 36' depth, the Army Corps of Engineers must dredge upwards of 1 million cubic yards of sediment each year.]* This shallow profile supports many important plant and wildlife communities, discussed below.

The Grays Harbor Estuary. Grays Harbor Estuary is one of a handful on the Pacific coast of North America, and is key component of the Pacific Flyway. *[Footnote: The Pacific Flyway is a major north-south migration corridor for shorebirds and waterfowl extending from Alaska to Patagonia. The*

Flyway is composed of many key areas – usually noted for water resources – including at least two that have been the subject of public trust protections – Padilla Bay in Washington and Mono Lake in California.] More than 500,000 shorebirds, comprising at least 24 species, stage at Grays Harbor on their 15,000-mile round trip spring and autumn migrations between breeding grounds in the Arctic, and wintering grounds in Central and South America.

The Estuary includes several federal, state and local wildlife protection areas. The Grays Harbor National Wildlife Refuge (NWR) was established by Congress in 1988. *[Footnote: U.S. Fish & Wildlife Service, http://www.fws.gov/refuge/grays_harbor/.]* The NWR is nearing the end of a multi-year planning process to emphasize estuary protection and restoration (particularly using Integrated Pest Management methods to remove noxious plants), and to promote public access and education about the significance of the Grays Harbor Estuary. *[Footnote: U.S. Fish & Wildlife Service, Grays Harbor-Black River Unit Plan, http://www.fws.gov/pacific/planning/main/docs/WA/GraysHar_BlackRiv/GHBRPlanningUpdate3web.pdf.] In 1996, Grays Harbor Estuary was designated as a Hemispheric Reserve by the Western Hemisphere Shorebird Reserve Network, [Footnote: Western Hemisphere Shorebird Reserve Network, http://www.whsrn.org/western-hemisphere-shorebird-reserve-network and http://www.whsrn.org/site-profile/grays-harbor-estuary],* acknowledging it as a site of international significance.

Grays Harbor is also part of the Washington Department of Fish & Wildlife (WDFW) management area known as the Johns River Wildlife Area*. [Footnote: WA Dept. of Fish & Wildlife, http://wdfw.wa.gov/lands/wildlife_areas/johns_river/ and map: http://wdfw.wa.gov/webmaps/gohunt/wildlife_area_pdf/WLA_10128.pdf.]* Within and adjacent to Grays Harbor, WDFW manages seven wildlife units that preserve natural areas and prevent development on thousands of acres, in order to protect habitat for hundreds of species of birds, mammals, reptiles and amphibians, as well as provide public access to the shorelines and waters of Grays Harbor. These units protect special habitats at the land-water interface, including wetlands, salt marshes, dunes, and shorelines.

Grays Harbor County's Grays Harbor Estuary Management Plan calls for coordination among the confusing array of agencies and jurisdictions that have authority over the land and waters of Grays Harbor. *[Footnote: Grays Harbor County, http://www.co.grays-harbor.wa.us/info/pub_svcs/EstuaryPlan.htm (visited 11-25-15).]* The essence of the Plan is to allow a balance between development and resource protection, with an overarching goal to prevent significant degradation of the natural resources of the estuary.

Nonprofit organizations are also acquiring Grays Harbor habitats for protection. Grays Harbor Audubon has acquired the North Bay Wetland Preserve at the mouth of the Humptulips River and associated estuary. *[Footnote: Grays Harbor Audubon Society, North Bay Wetlands Preserve, at http://www.ghas.org/nwaca.php (visited 11-24-15).]* The Trust for Public Land is in the process of acquiring 9 acres in downtown Aberdeen to create a public waterfront park. *[Footnote: KBKW Newstalk, "Aberdeen could purchase waterfront park with help of Public Land Trust," (n.d.), at http://kbkw.com/aberdeen-could-purchase-waterfront-park-with-help-from-public-land-trust/ (visited 11-24-15).]*

Tourism and Local Economic Value of Grays Harbor. Grays Harbor is an important recreational resource. Birdwatching at the Grays Harbor Estuary is celebrated and advertised by the Aberdeen-Hoquiam visitor center as a major tourist and visitor attraction. *[Footnote: Grays Harbor Tourism,*

"Birdwatching" at http://visitgraysharbor.com/activities/birdwatching/.] Hoquiam hosts the annual Grays Harbor Shorebird Festival *[Footnote: Grays Harbor Shorebird & Nature Festival website, at http://www.shorebirdfestival.com/]*, held in late April or early May, which celebrates the stop-over of hundreds of thousands of shorebirds and attracts tens of thousands of visitors from throughout the country.

A 2015 survey of Washington coastal recreation reports that 36% of trips to the Washington coastline in the preceding 12 months were to the Grays Harbor area, where visitors undertook a variety of activities including beachgoing, sightseeing, and wildlife viewing. *[Footnote: Point 97 and Surfrider Foundation, Washington Coastal Recreation Survey at 17 (May 2015) at publicfiles.surfrider.org/P97SurfriderWACoastalRecreationReport.pdf. See also Map Appendix at 31 (PDF p. 86).]* Visitors spent an average of $113 per person per trip. *[Footnote: Id.]*

Non-Treaty Commercial Fishing. Fishing is a traditional Grays Harbor industry. Grays Harbor is the number one seafood landing source in Washington State, including the largest fish landing port in Westport, and the largest cold storage facility for seafood in the state. *[Footnote: Port of Grays Harbor website, http://www.portofgraysharbor.com/about/index.php.]* Multiple studies of the economic impact of its commercial fishing have concluded that fishing is a significant contributor to the Grays Harbor economy. *[Footnote: Resource Dimensions, Economic Impacts of Crude Oil Transport on the Grays Harbor Economy (Aug. 2015).]* Commercial fishing out of Westport Marina (including the fishing fleet, fish processing, and cold storage) generated 2,050 jobs in 2013, and $200 million in business revenue.*[Footnote: Port of Grays Harbor, http://www.portofgraysharbor.com/about/Economic-Impact-Report.php. This does not include the landed value of the fish catch. Id. at p. 30.]* Fishing vessels include purse seiners, trollers, trawlers, and crabbers. Westport Marina is a hub of charter fishing industry in Washington state, and recreational fishing added another 245 jobs and $24.5 million in business revenue. *[Footnote: Id.]* Combined, these jobs and revenues comprise the largest sector of both for the four Port of Grays Harbor terminals.

Of course, in order to serve as a commercial fishing resource, Grays Harbor must provide habitat for fish. Chinook, coho, chum and steelhead are present at various life stages throughout the extent of Grays Harbor, and are likely present year-round. Grays Harbor provides abundant, high quality habitat for salmon, sturgeon and crab, and is likely utilized by salmon originating from rivers that are tributary to Grays Harbor as well as outside the local ecosystem. *[Footnote: Sandell, et al., Grays Harbor Estuary Salmonid Conservation and Restoration Plan (WFC May 2015) at http://www.chehalisleadentity.org/wp-content/uploads/WFC-2015-Grays-Harbor-Estuary-conservation-plan.final_.pdf.]*

Tribal Treaty Fishing & Gathering Resources. Grays Harbor falls within the Quinault Indian Nation's (QIN) federally-protect treaty fishing and gathering area, where Quinault tribal members have fished and gathered since time immemorial, and as such is a critically important tribal treaty resource. *[Footnote: The Quinault Indian Nation is signatory to the Treaty of Olympia, signed by Quinault ancestors on July 1, 1855, and ratified by the U.S. Congress in 1859.]* QIN members use inner Grays Harbor to fish for salmon, crab, and white sturgeon. QIN members also collect weaving materials and gather traditional plants such as sweetgrass and cattail stems, and other resources including plants that serve as medicines. Coastal resources outside Grays Harbor include salmon, razor claims, and crab, along with ocean fisheries including but not limited to halibut, lingcod, sablefish, rockfish, and sardines. *[Footnote: See generally, Letter, QIN to Maia Bellon, Dept of Ecology, Re QIN Fishing Resources in Grays Harbor area (5-20-15); Resource Dimensions, Economic Impacts of*

Crude Oil Transport on the Quinault Indian Nation and the Local Economy at ES-3 to ES-7 (April 2015).]

5. The Westway and Imperium oil terminal proposals will harm public trust interests in Grays Harbor.

Construction and operation of the Westway and Imperium oil terminals would cause major, negative impacts on the public trust resources of Grays Harbor. *[Footnote: For full information about the potential adverse impacts of the proposed oil terminals on Grays Harbor resources, including the many impacts not adequately addressed in the Westway and Imperium DEISs, please see the Quinault Indian Nation's comments on the Draft Environmental Impact Statements, submitted on Nov. 24, 2015.]* Rail and vessel transport will limit public and tribal access to fisheries. *[Footnote: DEIS, "Rail & Vessel Transport" (ES, pp. S-15 to S-16, S-19), project significant, unavoidable adverse impacts to tribal access to crab fisheries and general interference with salmon fisheries.]* At its most dramatic, the projects could cause oil spills, fires, explosions.*[Footnote: DEIS, ES (pp. S-19 et seq.), Chapter 4 (Environmental Health & Safety), Chapter 5 (Extended Rail and Vessel Transport) and 2014 State Marine and Rail Oil Transportation Study.]* Oil spills, depending on size, location and conditions, could injure every biological resource within Grays Harbor, including especially the numerous vulnerable habitats that support salmon fisheries, migratory bird populations, and other wildlife. Oils spills would also affect commercial and recreational use of the navigable waters of Grays Harbor, including marine-related businesses such as beach resorts, marinas, fishing guides and tour companies, and the secondary tourism economy that benefits from substantial public recreational use of Grays Harbor. *[Footnote: See generally, Resource Dimensions, supra; QIN Scoping Comments for Westway & Imperium Terminals (5-27-14).]*

Response T5-2

The EIS looks at the potential environmental impacts of the proposed action on the environment, including public resources. The potential impacts associated with routine operations of the proposed action are addressed in Chapter 3, *Affected Environment, Impacts, and Mitigation*. Potential impacts on fish and wildlife are addressed in Section 3.5, *Animals*. Potential impacts on tribal resources are addressed in Section 3.12, *Tribal Resources*. The risks related to oil spills, fires, and explosions are addressed in Chapter 4, *Environmental Health and Safety*, with the potential environmental impacts addressed in Section 4.7, *Impacts on Resources*. Chapter 6, *Cumulative Impacts*, considers the cumulative impacts on these resources and Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses the economic and social impacts of the proposed action alone, including a discussion of the costs and benefits of the proposed action. Refer to the Master Response for the Purpose and Focus of the EIS.

Comment T5-3

6. Climate change impacts on Grays Harbor resources demand denial of the project permits.

Introduction.

The Public Trust Doctrine serves as a basis of authority for Ecology to deny the projects based on climate change impacts to Grays Harbor trust resources. Courts have just begun to grapple with the application of the Public Trust Doctrine to protect trust resources from the impacts of climate change, and there is not a lot of judicial authority on this subject. However, as recently recognized in a court decision issued by the King County (WA) Superior Court, there is no question that

greenhouse gas emissions are causing climate change, and climate change is causing adverse impacts coastal resources such as Grays Harbor.

> [C]urrent science makes clear that global warming is impacting the acidification of the oceans to alarming and dangerous levels, thus endangering the bounty of our navigable waters. . . . The navigable waters and the atmosphere are intertwined and to argue a separation of the two, or to argue that GHG emissions do not affect navigable waters is nonsensical. Therefore, the Public Trust Doctrine mandates that the State act through its designated agency to protect what it holds in trust. The Department of Ecology is the agency authorized both to recommend changes in [] standards and to establish limits that are responsible. *[Footnote: Foster, supra, at p. 8.]*

As in Foster, the Department of Ecology is the agency authorized to implement the Shoreline Management Act and the public trust resources that the SMA is designed to protect. Along with its statutory authorities, the Public Trust Doctrine provides Ecology with the basis to address the cumulative, long-term scope of damage caused by crude-by-rail oil terminals.

The DEIS chapter on Cumulative Impacts and Air discusses greenhouse gas (GHG) emissions and climate change impacts associated with the oil terminal projects. *[Footnote: DEIS, Chapter 6, Cumulative Impacts, Air, Section, pp. 6-10 to 6-18. This section also includes discussion of impacts associated with the proposed Grays Harbor Rail oil terminal project. For response to the inadequacy of the DEIS discussion of cumulative impacts, please see the Quinault Indian Nation's comments on the Westway and Imperium Draft Environmental Impact Statements, submitted on Nov. 24, 2015.]* This section notes that GHG emissions are small (0.23% of Washington's 2050 statutory reduction of GHG emissions) and the amount of oil that would be transported through the Port of Grays Harbor constitutes only 1.2% of U.S. daily crude oil supply. The DEIS describes the impacts of the projects' GHG emissions relative to baseline as speculative. *[Footnote: DEIS at p. 6-13.]* The conclusion does not recognize the projects' GHG emissions as a significant and adverse impact, and therefore does not propose any mitigation measures relating to GHG emissions and contributions to climate change.

The trouble with cumulative impacts is that they are cumulative. The percentage of impact associated with the Westway and Imperium Proposals is similar to the percentage impact associated with any oil transport project. When compared with the diffuse and global scale of petroleum exploitation, all projects look small. The DEIS is inadequate in its failure to recognize the Westway and Imperium Proposals as a gateway to future carbon emissions that will contribute irreversibly to atmospheric carbon concentrations, and thence to global climate change. Climate change is already causing specific and substantial adverse impacts to Grays Harbor and its public trust resources.

Impacts of climate change on Grays Harbor resources.

Climate change is having and will continue to have a major impact on Grays Harbor and associated coastal resources. *[Footnote: Sandell, Todd, et al., Climate Change in the Chehalis River and Grays Harbor Estuary (WFC 2013) at http://wildfishconservancy.org/projects/grays-harbor-juvenile-salmon-fish-community-study/WFC.ClimateChangeintheChehalisRiverandGraysHarborEstuary2012final.pdf and "Workshop offers look at Grays Harbor of the future" (Daily World, 4-10-14) at http://thedailyworld.com/news/local/workshop-offers-look-grays-harbor-future.]* As described below, the impacts of climate change on coastal resources include increases in sea level rise, saltwater intrusion into freshwater resources (surface and ground), extreme weather events and coastal flooding and erosion, and ocean acidification. *[Footnote: Sandell, supra; Huppert, D., et al., Impacts of Climate Change on the Coasts of Washington State, Ch. 8 in the Washington Climate Change*

Impacts and Adaptation Report (CSES 2009) at http://cses.washington.edu/db/pdf/wacciach8coasts651.pdf; WA Dept. of Ecology, Oceans and Coastlines, Ch. 6 (2012) at https://fortress.wa.gov/ecy/publications/publications/1201004h.pdf.] In addition, changes in precipitation amounts and timing, and loss of glaciers is affecting and will continue to affect the rivers that flow into and nourish Grays Harbor and its fish and wildlife habitat.

Sea Level Rise. As recognized in the DEIS, sea level rise on the Washington coast is expected to increase by 10 to 143 centimeters by 2100. *[Footnote: Sea-Level Rise for the Coasts of California, Oregon and Washington: Past, Present and Future, Report in Brief (NAS 2012) at http://www.ecy.wa.gov/climatechange/docs/ipa_slr_nrcbrief.pdf and Full Report at http://dels.nas.edu/Report/Level-Rise-Coasts/13389?bname=besr.]* In a new study of the effects of sea level rise on tidal marshes in eleven estuaries in the Pacific Northwest, including Grays Harbor, the U.S. Geological Survey cited Grays Harbor as one of the more resilient tidal estuaries, but even so, concluded that it will convert to high marsh, dramatically converting and limiting diverse estuarine habitat, by 2110. *[Footnote: USGS, Thorne, K. and B. Dugger, Marshes to Mudflats: Climate Change Effects along a Latitudinal Gradient in the Pacific Northwest (2015) at https://nccwsc.usgs.gov/display-project/4f8c64d2e4b0546c0c397b46/5006e99ee4b0abf7ce733f58.]* The Department of Ecology is directing shoreline planners to prepare for sea level rise in development of shoreline master programs. *[Footnote: Dept. of Ecology, Shoreline Master Plan Handbook, Appendix A, "Addressing Sea Level Rise in Shoreline Master Programs," (7-1-10) at http://www.ecy.wa.gov/programs/sea/shorelines/smp/handbook/appendixA.pdf.]* DEIS Fig. 6-4 illustrates the impacts of a 3-foot increase in sea level, optimistically pointing out that the Westway and Imperium terminals will not be underwater, but failing to note that large sections of the Cities of Hoquiam and Aberdeen will be inundated.

Saltwater Intrusion. "Changes in climate and sea level will drive changes to the coastal groundwater system that will impact both human populations and coastal ecosystems. Increases in sea-level will raise the fresh water table in many coastal regions . . . Impacts to humans may include an increase in the potential for basement or septic system failure. Sea-level rise can also contaminate groundwater supplies due to landward and upward movement of sea-water in coastal aquifers" *[Footnote: U.S. Geologic Survey, Sea-level rise hazards and decision support: Coastal Groundwater Systems, at http://wh.er.usgs.gov/slr/coastalgroundwater.html; see also Dept. of Ecology, Rising Sea Level, at http://www.ecy.wa.gov/climatechange/risingsealevel_more.htm.]*, thus causing saltwater intrusion.

Extreme Weather, Coastal Flooding, and Erosion. Grays Harbor County is Washington's second most vulnerable to coastal flooding, and ranks first for the number of homes at risk due to enhanced coastal flooding. *[Footnote: Climate Central, Sea level rise and coastal flood exposure: Summary for Grays Harbor County, WA (2014) at http://ssrf.climatecentral.org.s3-website-us-east-1.amazonaws.com/Buffer2/states/WA/downloads/pdf_reports/County/WA_Grays_Harbor_County-report.pdf.]* There have been several severe storms of note in the Grays Harbor area in the past few years, including the January 5, 2015 rainstorm that dropped 7 inches of precipitation on Hoquiam in 24 hours, flooding urban areas and causing massive mudslides. *[Footnote: The Daily World, "Flooding, Landslides Hit the Harbor" (1-5-15) at http://thedailyworld.com/news/local/flooding-landslides-hit-harbors; The News Tribute, "Rain Event Hits Grays Harbor County" (n.d.) at http://www.thenewstribune.com/news/local/article25852570.html.]* Nonetheless, scientists do not yet have sufficient trend data to say definitely that extreme weather events on the Pacific Northwest coast are increasing in frequency, and are attributable to climate change. *[Footnote: The Daily World, "Flooding, Landslides Hit the Harbor" (1-5-15) at http://thedailyworld.com/news/local/flooding-landslides-hit-harbors; The News Tribute, "Rain Event Hits Grays Harbor County" (n.d.) at*

http://www.thenewstribune.com/news/local/article25852570.html.] What is known is that a combination of very high ("king") tides, storm surges, and heavy precipitation can cause substantial flood and slide damage. Sea level rise will magnify the effects of storm surges and high tides on coastal environments. *[Footnote: Dalrymple, Robert A., Sea-Level Rise for the Coasts of California, Oregon and Washington: Past, Present and Future, Powerpoint Presentation (NRC 6-20-12) at http://www.ecy.wa.gov/climatechange/docs/ipa_slr_nrcpresentation.pdf.]* Inland marshes and wetlands, such as those found in Grays Harbor can ameliorate coastal flooding impacts, but sea level rise is predicted to eliminate this resilience. Erosion has been a longstanding problem at the South Jetty/Half Moon Bay area near Westport and the entrance to Grays Harbor. *[Footnote: WA Dept. of Ecology, Westport South Jetty shoreline changes, webpage at http://www.ecy.wa.gov/programs/sea/coast/erosion/westport.html.]*

Ocean Acidification. Ocean acidification or OA is a long-term progressive change in ocean water chemistry due to the uptake of CO2 from the atmosphere. It is changing seawater carbonate chemistry, with substantial negative biological impacts on coastal marine organisms. Coastal areas with large freshwater inputs, such as Grays Harbor, are particularly vulnerable to these changes. Shellfish in particular are at risk of exceeding tolerances for ocean pH. *[Footnote: NANOOS, et al, Ocean Acidification in the Pacific Northwest (May 2014); Washington State Blue Ribbon Panel on Ocean Acidification, "From Knowledge to Action," (Nov. 2012); see also extensive materials set forth at Wash. Dept of Ecology website on "Ocean Acidification and Washington State" at http://www.ecy.wa.gov/water/marine/oceanacidification.html (visited 11-25-15).]*

Precipitation Changes and Glacial Loss. One well-known harbinger of climate change is the changes in precipitation that will occur as a result of a warming atmosphere. Scientists project that the amount of precip falling will not change much for Washington's coast range, but that it will fall as rain, rather than snow. This will radically change the timing of run-off of rivers and their suitability as habitat for salmon and other aquatic species. *[Footnote: Mote, P.A., et al., National Climate Assessment, Pacific Northwest Region (2014).]* Similarly, the loss of glacial mass in Olympic National Park is a striking indicator of how global change is causing very local impacts. *[Footnote: See National Park Service, infra.]*

B. Greenhouse gas emissions are a direct cause of climate change and its consequent harm to Grays Harbor (and the rest of Washington State).

Climate change is a direct consequence of atmospheric warming caused by greenhouse gas emissions, most notably carbon dioxide or CO2*. [Footnote: The Department of Ecology has recognized the substantial damage that GHG emissions are working on Washington's natural resources. See WA Dept. of Ecology, Washington Greenhouse Gas Emission Reduction Limits (Dec. 2014), at pp. 11-14, at https://fortress.wa.gov/ecy/publications/documents/1401006.pdf. The DEIS provides a brief discussion of the relationship between GHG emissions and climate change. DEIS, Chapter 6, Cumulative Impacts, Air, Greenhouse Gas Emissions, pp. 6-14 to 6-17.]* In 2013, CO2 accounted for about 82% of all U.S. greenhouse gas emissions from human activities. The main human activity that emits CO2 is the combustion of fossil fuels (coal, natural gas, and oil) for energy and transportation. The combustion of fossil fuels such as gasoline and diesel to transport people and goods is the second largest source of CO2 emissions, accounting for about 31% of total U.S. CO2 emissions and 26% of total U.S. greenhouse gas emissions in 2013. *[Footnote: U.S. Environmental Protection Agency, Overview of Greenhouse Gas emissions, http://www3.epa.gov/climatechange/ghgemissions/gases/co2.html (visited 11-23-15).] CO2*

comprises 57% of global greenhouse gas emissions. [Footnote: Id. (http://www3.epa.gov/climatechange/ghgemissions/global.html) citing IPCC 2007.]

Atmospheric warming (caused by CO2 concentrations) is, in turn, the major cause of the melting polar ice cap, as well as the glacial melt experienced locally in Washington State and on the Olympic Peninsula. *[Footnote: Vinas, M. and C. Rasmussen, Warming Seas and Melting Ice Sheets (NASA, 8-26-15) at http://climate.nasa.gov/news/2328/. A 2009 inventory of Olympic National Park glaciers found a reduction in the number of glaciers from 266 to 184 during the period 1982 to 2009, a 34% loss in glacial surface area from the period 1970 to 2009, and a decrease in ice volume of at least 15% between 1987 and 2009. See National Park Service, Glaciers & Climate Change, Olympic National Park, http://www.nps.gov/olym/learn/nature/glaciers.htm.]* Melting glaciers and ice sheets are and will continue as the major contributors to sea level rise, followed by increases in ocean mass as water temperatures increase. *[Footnote: Vinas & Rasmussen, supra; Sea-Level Rise for the Coasts of California, Oregon and Washington: Past, Present and Future, Report in Brief (NRC 2012) at http://www.ecy.wa.gov/climatechange/docs/ipa_slr_nrcbrief.pdf.]*

GHG emissions remain largely uncontrolled in the United States, with CO2 atmospheric concentrations still on the rise. *[Footnote: CO2NOW provides a monthly update of global CO2 atmospheric concentrations as measured at Mauna Loa, Hawaii, along with other pertinent information. See CO2NOW at http://co2now.org/.]* Climate scientists urge that radical reductions in GHG emissions are needed, perhaps even near-zero emissions, in order to stabilize the planet's climate. Washington explicitly recognizes the need to control GHG emissions and has set targets for future reductions. *[Footnote: RCW Ch. 70.235. See Foster, supra.]*

Each step in moving and consuming crude oil, from initial mining to final combustion, causes release of greenhouse gases. With respect to the Westway and Imperium oil terminal Proposals, the extraction of Bakken crude (through "flaring") and Tarsands bitumen (requiring massive amounts of energy for heating and dilution). *[Footnote: Geology.com, http://geology.com/articles/bakken-formation.shtml and U.S. Dept. of Interior, 2012 Oil Shale & Tar Sands Programmatic EIS at http://ostseis.anl.gov/guide/tarsands/ (both visited 11-23-150]*. Transport to Grays Harbor by diesel-powered train, transport by diesel and bunker fuel-powered vessel to distant ports, refining into end products, and combustion of end products for transportation, power generation and industrial purposes, will contribute greenhouse gases to the global environment. *[Footnote: The DEIS analyzes project-related GHG emissions related at Section 6.5, pp. 6-10 to 6-14, and combines analysis of the Westway and Imperium Proposals with the Grays Harbor Rail Terminal Proposal.]*

Thus, the Westway and Imperium oil terminals projects, if built, will be a part of a great cycle of activity that is global in scope, but will visit very local destruction on the resources of Grays Harbor as well as the rest of Washington State. These consequences are not hypothetical. The science is clear that CO2, derived from burning fossil fuels, is the largest fraction of greenhouse gases contributing to climate change. Climate change is changing coastal and estuarine environments. The science is also clear that climate change is causing and will continue to cause harm to Grays Harbor, the Pacific coastline in the area of Grays Harbor, and the Chehalis River.

A. Ecology should exercise its public trust authority to deny the permits for oil terminals based on climate change impacts.

Through its enabling statute, SEPA and the Shoreline Management Act, the State of Washington, through the Department of Ecology, possesses both the authority and the duty to recognize the full scope of climate change impacts on Grays Harbor public trust resources caused by the oil

production-to-combustion cycle and that will be represented by the proposed Westway and Imperium Proposals.

Ecology is duty-bound to deny the projects, because permitting them will cause an impairment of public trust resources. The Public Trust Doctrine provides the flexibility to not just consider, but also to substantively address the full scope of the issues and concerns associated with the Westway and Imperium Proposals, including:

- The totality of GHG emissions in Washington, and globally that are affecting Grays Harbor and its resources.
- The multiplicity of present and reasonably forseeable proposed projects that would contribute GHG emissions, climate change and ultimate harm Grays Harbor, including ***all*** oil terminals, coal terminals, highway projects that promote automobile combustion, and etc.
- The duty as co-tenant and joint manager with the Quinault Indian Nation to not waste shared public trust resources, i.e., Grays Harbor fisheries.
- The intergenerational impacts to trust resources that will have devastating effects on future generations if not halted.
- The specific impact of climate change on resources that are traditionally protected by the Public Trust Doctrine, including navigation, commerce and especially fisheries and wildlife resources.
- The specific impact of climate change on corollary resources that have not been traditionally called out by the Washington courts, when applying the Public Trust Doctrine, but which public necessity requires protection. These include coastal stability, glacial stability, marine water quality (i.e., acidity, domoic acid), freshwater quality (i.e., temperature), and so forth.

The scope of the State's public trust authority and duties clearly extend to the affected waters and associated resources of Grays Harbor. In addition to its statutory authority, Washington's Public Trust Doctrine protects navigable waterways, as well as the fisheries, wildlife and water quality within those waterways. Moreover, the scope of Washington's public trust application is not fixed and may expand according to public need. [Footnote: Orion Corp., supra; Weden, supra.]

While the Washington judiciary has just begun to link the Public Trust Doctrine with the cumulative impacts associated with climate change, the doctrine's qualities of protecting public interests (including intergenerational interests) make it a particularly useful tool where statutory authorities may be limited.

7. Conclusion.

Grays Harbor, for the many reasons described herein, merits the highest order of protection by the State of Washington and City of Hoquiam. The Harbor's biological, commercial and recreational resources are a part of the common heritage of Washington's citizens, and have value far beyond simple economics. Washington must protect Grays Harbor for today's citizens, and tomorrow's. The Department of Ecology and City of Hoquiam should acknowledge and invoke their duties and authorities as representatives of the public trustee to deny the Westway and Imperium oil terminal Proposals.

Response T5-3

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport in Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. The Final EIS reflects greenhouse gas emission estimates from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Based on the Crude Oil Market Analysis (Final EIS Appendix Q), the proposed action is not expected to induce crude oil production at the source and crude oil handled under the proposed action is not expected to be exported. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, acknowledges that greenhouse gas emissions from the cumulative projects would contribute to global greenhouse gas emissions, which contribute to climate change, and describes the projected impacts of climate change in the Pacific Northwest. The Final EIS section reflects the addition of saltwater intrusion to the list of impacts.

T6, Quinault Indian Nation, President Sharp

Comment T6-1

On behalf of the Quinault Indian Nation, we thank you for providing this opportunity to provide this testimony. Grays Harbor is the gateway of the Olympic Peninsula. It offers to people of Washington and our visitors to incredible recreational and economic opportunity. It boasts beautiful beaches, one of the most significant bird sanctuaries on the West Coast, a vibrant fishing and crabbing industry, and the best razor clams you can find.

It is where the Quinault people have lived since time in memorial. It sustains our traditional culture of fishing, hunting, and gathering. Allowing millions of gallons of Bakken crude oil to be transferred across these lands and waters is a horrific mistake.

After many years, Grays Harbor's recovery from the changes in the timber industry and consequent loss of local jobs and more than ever we depend on pristine beauty of this region as driver of the economy.

We have learned from the experience of the WasDOT2 project that these big ticket projects don't create local jobs. Experienced workers with seniority are brought in from elsewhere for the very few highly specialized jobs that are needed.

The boom and bust oil industry is not the kind of economy we need here in Washington state or on the harbor. The oil industry promised jobs and tax revenue for Grays Harbor. These are false promises. The few jobs they promise will put hundreds of local jobs, businesses, and lives at risk.

Quinault is the largest employer in the harbor. We understand how critical local jobs and continue to be committed to working with the local government to capitalize on our natural resources.

Earlier this year the Quinault Indian Nation commissioned an in-depth economic analysis of the impacts of these crude by rail projects. This study confirmed in 2013 Quinault fishing and business activities contributed to the local economy with more than $84 million in business revenue, 32

million in local purchases, 907.7 direct and indirect local jobs. And we'll continue to offer a pristine economy.

Thank you.

Response T6-1

Comment acknowledged.

T7, Quinault Indian Nation, Tyson Johnston

Comment T7-1

My name is Tyson Johnston, I'm the vice president of the Quinault Nation. I'm here speaking on behalf of my tribe.

Grays Harbor is the gateway to the Olympic Peninsula. It offers the people of Washington and our visitors incredible recreational and economic opportunities, the most beautiful beaches, one of the most significant bird flyways and sanctuaries on the West Coast, a vibrant fishing and crabbing industry, and the best razor clams that you can find.

It's where the Quinault people have lived since time in the (inaudible). It sustains our traditional culture of hunting, fishing and gathering. The oil industry promises jobs and tax revenues to Grays Harbor, but the few jobs they promise will put hundreds of local jobs, businesses, and longstanding ways of it at risk.

This crude oil improvement is not on impinging on culture but also the fishing-based culture of the harbor, as well as the tourism that so many of us depend on for jobs.

Millions of gallons of crude oil crossing our communities and waters will kill our hopes for economic recovery, decimating the downtown and destroying real estate values.

The loss to our quality of life must not be sacrificed for the false hope of a few jobs, because most of those jobs will go to people who are transferred in from other areas.

Quinault is the largest employer in the harbor. We understand how critical local jobs are and have been and continue to partner with our local governments to capitalize on our local resources to create a more vibrant economy.

We believe Grays Harbor as the gateway to the Olympic Peninsula has more to offer than becoming an industrial oil zone.

Both of the Draft Environmental Impact Statements for Westway and Imperium have concluded that these projects would result in harmful impacts to tribal resources, increased air pollution from more diesel trains and boats, increased noise and increased vehicle delay at railroad crossings large enough to interrupt emergency vehicle response times.

These impacts cannot be fully mitigated. They've also found that these risks of oil spills during rail transports at the terminal site and during marine vessel transport through Grays Harbor cannot be fully mitigated. And if a spill occurred, the environmental impact would be significant.

Also, these projects will increase rail and marine vessel traffic and would increase the risk of derailment, collision, spill, fire, or explosion.

The nation calls on the City of Hoquiam to deny these permits because these risks are unacceptable. Thank you.

Response T7-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

T8, Quinault Indian Nation, Kristen Boyles (EarthJustice)

Comment T8-1

Attached are the Quinault Indian Nation's comments on the DEIS for the Westway and Imperium Crude-By-Rail Terminals. Also attached are Exhibits 1 through 4 (Expert Reports) and the list of all exhibits submitted (Exhibit 1-69). Hard copies of the Comments, Exhibits 1 through 4 (Expert Reports) and Index to Exhibits, and a CD containing Exhibits 1-69 were delivered to your office this afternoon (November 24, 2015).

November 24, 2015

Via Web Portal and Hand-Delivery
Westway and Imperium Terminal Services Expansion Projects EISs c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104
https://public.commentworks.com/cwx/westwayimperiumcommentform/

Re: Quinault Indian Nation Comments on Draft Environmental Impact Statements for the Westway and Imperium (now Renewable Energy Group) Crude-By-Rail Terminals

Greetings:

On August 31, 2015, the City of Hoquiam and Washington Department of Ecology issued two similar draft Environmental Impact Statements prepared under the State Environmental Policy Act ("SEPA") for the proposed Westway and Imperium (now Renewable Energy Group) crude-by-rail terminals. The Quinault Indian Nation has reviewed these documents and supporting materials and submits the following comments. Exhibits to this comment letter are submitted on a separate CD. These comments expressly incorporate and attach expert reports prepared by Nuka Research and Planning Group (Exh. 1), Fred Millar, Ph.D. (Exh. 2), Resource Dimensions (Exh. 3), and Joseph Wartman, Ph.D. (Exh. 4).

1.0 SUMMARY

- The DEISs conclude these projects would cause significant and harmful impacts to tribal resources that cannot be mitigated.
- The DEISs determine that multiple aspects of these projects would cause significant and harmful environmental and public health impacts that cannot be fully mitigated. These impacts include increased air pollution from more diesel trains and ships, increased noise, and increased vehicle delay at railroad crossings large enough to disrupt emergency vehicle response times.

- The DEISs finds that these projects create serious and harmful risks of oil spills, collisions, derailments, fires, and explosions that would cause significant and unavoidable environmental damage.

Response T8-1

Master responses in Chapter 2, *Comment Themes and Master Responses,* of this Final EIS address the issues below and are referred to in subsequent Responses to Comments.

- Geographic Scope of the EIS
- Baseline and No-Action Alternative
- Mitigation Framework
- Environmental Health and Safety Analysis
- Risk Assessment Methods
- Oil Spill Modeling Methods
- Emergency Response and Planning Gaps Evaluation
- Liability and Responsibility for Incidents
- Cumulative Impact Analysis
- Crude Oil Extraction, Transport, and Combustion
- Project Objective and Alternatives
- Vessel Traffic Baseline and Projections
- Earthquake Probabilities
- Seismic Risk and Design Requirements
- Applicability of Measures to Westway Alone
- Purpose and Focus of the EIS
- Economics, Social Policy, and Cost-Benefit Analyses

The Final EIS *Summary* describes the potentially significant impacts that could not be completely eliminated with the implementation of the proposed mitigation measures. These include impacts on noise, tribal resources, vehicle traffic, and environmental health and safety.

Where appropriate, responses to the following summary points (T8-2 through T8-12) refer the reader to a master response or more complete responses to comments in the body of this letter.

Exhibits 1 through 4 (Expert Reports) are included and responded to below. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Comment T8-2

- The expected frequency of any type of oil spill (2,100 gallons or more) harming the marine environment is a one spill every 2.2 years. These projects would cause 40-fold increase in oil spill risk in Grays Harbor as compared to current conditions. The DEISs' analysis and presentation is needlessly complicated and designed to minimize the perception of risks.

Response T8-2

As discussed in the Master Response for Environmental Health and Safety Analysis and based on the risk assessment in Draft EIS Appendix M, *Risk Assessment Technical Report*, the analysis of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, evaluates the likelihood of different spill sizes associated with terminal (onsite) operations, rail transportation, and vessel transportation separately. The risks across these operations are not combined in the Draft EIS because of differing regulatory and design requirements described in Chapter 4, because the cause of an incident involving the facility or rail or vessel transport would likely be different, and because the proposed facility, rail line, and vessel transport corridor are physically separated.

Comment T8-3

- SEPA compels the DEISs to contain thorough information and discussion, to be based on sufficient information to support their conclusions; to obtain and include reasonably available unknown information; to disclose gaps in analysis and scientific uncertainty in order to allow a reasoned decision. The DEISs fail to comply with these requirements.
- The DEISs fail to review and analyze the complete impacts of these proposed projects. The DEISs' analysis (1) fails to consider increased rail impacts and risks across the state; (2) fails to consider increased vessel impacts along the Pacific coast; (3) fails to consider a reasonable range of alternatives; (4) fails to review the projects' full lifetime; (5) fails to use the appropriate no-action baseline; and (6) fails to present logical, consistent, and supported information. On these failures alone, the DEISs violate SEPA and would not withstand judicial review.

Response T8-3

Refer to responses to the following comments below:

- Rail impacts and risk across the state: T8-21, 25, 44, 59
- Increased vessel impacts along the Pacific Coast: T8-22
- Reasonable alternatives: T8-18
- Project lifetime: T8-19 and T8-24
- No-action baseline: T8-19

Comment T8-4

- The DEISs play math games with the reader to make significant risks and harms appear less likely. The DEISs do this by: (1) incorrectly treating the no-action alterative as similar to the proposed projects; (2) reviewing impacts for only 20 years, as opposed to the lifetime of the projects; (3) not fully reviewing all cumulative impacts; (4) limiting the scope of review; (4) using different calculations for amount of oil per train and marine vessel; (5) underestimating the number of annual vessel trips; and (6) not providing the public with a clear understanding of the increase in risk due to these projects.

Response T8-4

For general information on the topics identified in this comment, refer to the responses as indicated below. More detailed responses are presented where these issues are raised in subsequent comments.

1. Refer to Response to Comment T8-19.
2. Refer to Response to Comment T8-24.
3. Refer to the Master Response for Cumulative Impact Analysis.
4. Refer to Response to Comment T8-21 and T8-22.

4 (second listing). Refer to Comment T8-57.

5. Refer to Response to Comment T8-64.
6. Refer to the Master Response for Risk Assessment Methods for more information about interpreting the results of the risk assessment presented in the Draft EIS.

Comment T8-5

- The DEISs fail to fully review impacts of increased rail traffic, fail to use most recent and applicable data on oil train accidents, rely on admittedly inadequate federal regulations and unknown future supposed rail improvements, and present unclear and confusing information on predicted accidents on the PS&P line.

Response T8-5

For information about the scope of the analysis of rail-related impacts, refer to the Master Response for the Geographic Scope of the EIS.

For information about the sources of data and the analysis of the risks of rail transport, refer to the Master Response for Risk Assessment Methods.

For information about the analysis of emergency preparedness planning and response gaps, refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment T8-6

- Maps of oil spill trajectories are uninformative, and risks represented by sliding scale graphics do not provide useful information.
- The DEISs fail to use sufficient evidence or provide thorough review of types of crude oil to be transported, the source and destination of the crude oil, and impacts on public waters, plants, fish and wildlife.

Response T8-6

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Refer to the following responses to comments on these topics.

- Types of crude oil and crude oil sources and destinations: T8-14, 45, and 67
- Impacts on water: T8-68 through 72
- Impacts on plants: T8-73 through 78
- Impacts on fish and wildlife: T8-79 through 96

Comment T8-7

- The DEISs do not adequately address air pollution impacts or impacts from increased rail traffic (including delays and noise).

Response T8-7

Refer to the following responses to comments on these topics.

- Air quality impacts: T8-73 and T8-100 through T8-104
- Vehicle delay impacts: T8-32
- Noise impacts: T8-99

Comment T8-8

- The DEISs fail to fully address seismic risks, particularly for moderate earthquakes and tsunamis in general.

Response T8-8

Refer to Responses to Comments T8-105 through T8-111.

Comment T8-9

The DEISs fail to accurately and adequately review and consider economic impacts.

Response T8-9

Refer to Responses to Comments T8-215 through T8-264.

Comment T8-10

- The DEISs' greenhouse gas analysis is incomplete and fails to include a full carbon life-cycle analysis. For the emissions reviewed, the DEISs attempt to downplay their significance.

Response T8-10

Refer to Response to Comment T8-113.

Comment T8-11

- The DEISs inappropriately rely on inadequate regulatory standards and future promises to discount rail safety risks.

Response T8-11

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment T8-12

These projects would violate civil rights and other laws because of the disproportionate impacts that are acknowledged to be unavoidable.

Response T8-12

Refer to the responses to comments related to impacts on minority and low-income populations: T8-114 through 119.

Comment T8-13

The DEISs must be revised to address their fundamental deficiencies. Correction of the DEISs' flaws will lead to even firmer conclusions that these projects present significant, adverse environmental and public health harms and risks that cannot be mitigated. SEPA itself grants the authority to say no. Ecology and the City of Hoquiam should use that authority, as well as separate authority from other applicable statutes and regulations, to reject these oil shipping terminals.

Response T8-13

Refer to Final EIS Chapter 1, *Introduction*, for a summary of revisions in the Final EIS.

Comment T8-14

2.0 WESTWAY TERMINAL COMPANY AND IMPERIUM TERMINAL SERVICES

2.1 ON-SITE PROJECT DESCRIPTIONS

Westway and Imperium would transfer oil received by rail into onsite storage tanks. Westway intends to build five storage tanks that would each hold 8.4 million gallons of oil. Westway DEIS at 1-1. *[Footnote: Because the Westway and Imperium DEISs are identical in many respects, these comments apply to both, and citations to the DEISs are applicable to both documents unless noted.]* Westway's facility would have the capacity to hold 42 million gallons of oil at any time. Westway DEIS at 1-1. Imperium would add nine storage tanks that could each hold 3.36 million gallons of oil. Imperium DEIS at 1-1. The expansion would result in a total yearly throughput capacity of 806.4 million gallons for Westway and 1.26 billion gallons for Imperium. Westway DEIS at 2-8; Imperium DEIS at 2-11. The daily crude oil throughput for the Westway and Imperium facilities would be, respectively, 48,918 barrels and 82,192 barrels. Westway DEIS at 6-14; Imperium DEIS at 6-14.

In addition to the Westway and Imperium projects, a third crude-by-rail facility is proposed for Grays Harbor. US Development Group ("USD") and its subsidiary, Grays Harbor Rail Terminal, have applied for the same type of facility as Westway and Imperium, one that would receive crude oil by rail, store it in large tanks, and ship it out by vessel. The USD project would move an average of 45,000 barrels through its facility each day. Westway DEIS at 6-14; Imperium DEIS at 6-14. That oil would arrive by 365 additional train trips into and out of Grays Harbor each year and approximately 120 vessel trips. Westway DEIS at 6-5; Imperium DEIS at 6-5. The USD project would mean an additional unit train every day, on average, and more than two vessel trips each week. Westway

DEIS at 6-6; Imperium DEIS at 6-6. *[Footnote: As discussed further below, it is not clear how the DEISs arrived at these numbers and if they are accurate.]*

2.2 SOURCES OF CRUDE OIL

Westway and Imperium propose to begin accepting, storing, and shipping at least two different types of crude oil, each of which present tremendous, though different, environmental and human health threats. Both companies anticipate that the crude oil they would handle would originate in the Bakken formation in the Intermountain Region and central United States. Westway DEIS at 2-9; Imperium DEIS at 2-12. Bakken crude is a low sulfur crude oil that is referred to as "light, sweet." Westway DEIS at 3.14-9; Imperium DEIS at 3.14-11. Compared to other crude oils, it has a higher vapor pressure, higher degree of volatility, higher degree of ignitability, and a higher degree of flammability. Id. In other words, Bakken crude is highly flammable and prone to explosion. Imperium DEIS App'x M at 4-3 to-4.

In addition to Bakken crude, the projects also discuss accepting diluted bitumen (or "dilbit") oil from the tar sands of Alberta, Canada. Westway DEIS at 2-9; Imperium DEIS at 2-12. Unlike Bakken crude, dilbit is a heavy, dark, and viscous oil. Westway DEIS at 3.14-9; Imperium DEIS at 3.14-11. To decrease viscosity to allow transportation, dilbit is diluted with lighted hydrocarbons. When spilled, dilbit behaves very differently from other oils because it is heavy but also contains lighter diluents. Westway DEIS at 4.3-3; Imperium DEIS at 4.3-3. Initially, dilbit would float on the water, but its lighter components would eventually evaporate, allowing the remaining dilbit to sink below the surface, making it very difficult to remove. Id. Oil such as dilbit that is imported from Canada is not subject to the U.S. crude oil export ban and may be shipped to ports around the world. Westway DEIS at 5-1; Imperium DEIS at 5-1.

Response T8-14

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods.

Comment T8-15

2.3 RAIL TRANSPORTATION

The crude oil would be moved to the Westway and Imperium terminals by way of unit trains, which are trains consisting of approximately 120 cars loaded with crude oil. *[Footnote: The DEIS fails to deal with the issue of varying tank car capacity. One barrel of oil = 42 U.S. gallons. For "light" crude oil, such as that from the Bakken, the Association of American Railroads has stated that the ideal rail tank car capacity is 30,000 to 32,000 gallons (or 714-761 barrels). In prior correspondence with regulators, Westway has used the figure of 714 barrels of crude per tank car, while Imperium estimates an average of 743 barrels per tank car. The Shell refinery in Anacortes used 720 barrels per tank car in its calculations. Ecology and Hoquiam should demand that the companies use a consistent tank car capacity number, not just one that serves individual calculations.]* Westway DEIS at 2-9; Imperium

DEIS at 2-13. Westway anticipates converting its site into a crude oil depot would result in a maximum of 458 unit train trips each year, for an average of 1.25 trips every day. Westway DEIS at 2-9. Imperium's crude oil business would result in an additional 730 unit train trips each year, for a total of two trips on average each day. Imperium DEIS at 2-13. The train trips would originate in either the central United States, for Bakken crude, or in Alberta, Canada, for tar sands crude. Westway DEIS at 2-9; Imperium DEIS at 2-13. The crude would then travel to Centralia, Washington along the main rail lines, and then along the PS&P rail line to the Port of Grays Harbor. Id.

Response T8-15

As described in Draft EIS Chapter 4, Section 4.5.1, *Environmental Health Risks—Rail Transport*, the Draft EIS analyzed 714 barrels per tank car. The proposed action and the REG (formerly Imperium Terminal Services) Expansion Project are separate actions and therefore would have variable numbers of tank cars per unit train, size of tank cars, and number of trips per day. These variations allow for a more accurate representation of expected rail traffic instead of using an average of the two actions.

Comment T8-16

2.4 MARINE TRANSPORTATION

Westway and Imperium would transfer crude oil from their sites by ocean-going vessel to other locations in the United States and abroad. Within the United States, Westway and Imperium would transfer oil mainly to refineries in Puget Sound and northern California, but they could transfer Canadian tar sands crude abroad. Westway DEIS at 2-9; Imperium DEIS at 2-13. The type of vessel would vary, but the largest vessels that would call at the sites are Panamax class tankers that hold up to 14.7 million gallons each. Westway DEIS at 2-10; Imperium DEIS at 2-13. Both expect to use tank barges, which hold up to 6.3 million gallons per barge. Westway estimates a maximum of 238 vessel trips each year, Westway DEIS at 2-10, and Imperium estimates a maximum of 400 vessel trips each year, Imperium DEIS at 2-13.

Response T8-16

Comment acknowledged.

Comment T8-17

3.0 STATE ENVIRONMENTAL POLICY ACT

The State Environmental Policy Act ("SEPA'') is Washington's core environmental policy and review statute. Like its federal counterpart, the National Environmental Policy Act ("NEPA"), SEPA broadly serves two purposes: first, to ensure that government decision-makers are fully apprised of the environmental consequences of their actions and, second, to encourage public participation in the consideration of environmental impacts. Norway Hill Preservation and Prot. Ass'n v. King Co, 87 Wn.2d 267,279 (1976). For decades, SEPA has served these purposes effectively, requiring full environmental reviews for projects with significant environmental impacts.

In adopting SEPA, the Washington legislature declared the protection of the environment to be a core state priority. RCW 43.21C.010. SEPA declares that "[t]he legislature recognizes that each person has a fundamental and inalienable right to a healthful environment and that each person has

a responsibility to contribute to the preservation and enhancement of the environment." RCW 43.21C.020(3). This policy statement, which is stronger than a similar statement in the federal counterpart of NEPA, "indicates in the strongest possible terms the basic importance of environmental concerns to the people of the state." Leschi v. Highway Comm'n, 84 Wn.2d 271, 279-80 (1974).

Response T8-17

Comment acknowledged.

Comment T8-18

4.0 REASONABLE ALTERNATIVES

SEPA requires that an EIS contain a detailed discussion of alternatives to the proposed action. RCW 43.21C.030(c)(iii). SEPA's regulations provide that an EIS must consider as alternatives those "actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation." WAC § 197-11-440(5)(b). The discussion of alternatives in an EIS need not be exhaustive, but the EIS must present sufficient information for a reasoned choice among alternatives. Toandos Peninsula Ass'n v. Jefferson Cy., 32 Wash. App. 473,483 (1982).

4.1 FAILURE TO REVIEW ANY REASONABLE ALTERNATIVES

The DEISs simply fail to comply with SEPA in their consideration of reasonable alternatives. For both projects, the DEISs analyze only two options: the company's proposal and a no-action alternative. Westway DEIS at S-2 to -3; Imperium DEIS at S-2 to -3. An EIS for a private project on a specific site must consider a "no action alternative plus other reasonable alternatives for achieving the proposal's objective on the same site." WAC§ 197-11-440(5)(d); Weyerhaeuser, 124 Wn.2d at 39. Additional reasonable alternatives, including other terminal designs, must be analyzed in a supplemental draft environmental impact statement in order to comply with SEPA.

4.2 PUBLIC PROJECT OF THE PORT

The DEIS adopts the private purpose of the project applicants with no consideration of the public use of the Port of Grays Harbor property, including any public need for the projects. Whether an EIS must include consideration of offsite alternatives depends on whether the project is public or private, for a public project EIS must also include a discussion of offsite alternatives to the proposal. *Weyerhaeuser*, 124 Wn.2d at 39.

Westway and Imperium are private companies, but the Port of Grays Harbor, a public entity, did not engage in any SEPA analysis prior to entering into the leases for these proposed projects. By virtue of land ownership, ports and cities have power to determine appropriate uses of public property and to require tenants to mitigate their environmental impacts. As courts have stressed, the "fundamental idea of SEPA" is to "prevent government agencies from approving projects and plans before the environmental impacts of doing so are understood." *Int'l Longshore & Warehouse Union, Local 19 v. City of Seattle*, 176 Wn. App. 512, 522 (2013) (emphasis added). Here, the DEIS defines alternatives so narrowly as to merely accept the applicant's private agenda, without any consideration of other uses of the Port's property and without considering alternative locations for these facilities.

Response T8-18

Refer to the Master Response for Project Objective and Alternatives for an explanation of the alternatives considered in the Draft EIS.

Regarding the location of the proposed action at a public port, the Port of Grays Harbor vetted the decision to lease its land to the applicant through a separate process that occurred prior to this SEPA evaluation. The Draft EIS evaluates the probable significant adverse environmental impacts of the proposed action, not whether the public has a need for the proposed action. Moreover, the proposed action is a private project because it was initiated by an entity other than a governmental agency. See WAC 197-11-780.

Comment T8-19

4.3 NO ACTION ALTERNATIVE

The DEIS for Westway incorrectly defines the no-action alternative. For Westway, the DEIS notes:

> . . . unrelated to the proposed application, the applicant anticipates an increase in throughput of methanol over the 20-year analysis period. For the purposes of this analysis and based on the applicant's understanding of market conditions, an additional estimated throughput of up to 12 million gallons of methanol per year would arrive by vessel, would be unloaded and stored on site, and would be loaded into barges or rail cars for offsite transport in a manner similar to existing conditions. Offsite transport is estimated to add approximately one tanker in, 10 tank barges out, and 364 rail cars (accommodated as part of existing freight trains) per year.

Westway DEIS at 2-12. That is not the present no-action alternative, which is to act as a baseline for comparison.

At other places in the DEIS, the definition of the no-action alternative is also incorrect and based on unsupported assumptions about future events. "Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in impacts similar to those described for the proposed action." Westway DEIS at 3.12-16.

Response T8-19

As noted in Final EIS Chapter 3, Section 3.0, *Introduction*, the EIS analyzes the impacts that could occur over the lifetime of the proposed facilities. Potential impacts were quantitatively evaluated in 2017—the anticipated first year of operation—and 2037 to account for future growth and development. This approach provides context to decision-makers about how the impacts of operations would evolve over a reasonably foreseeable period. This is particularly relevant for transportation- and risk-related impacts that can evolve over time because of reasonably foreseeable increased growth, planned infrastructure changes, and phased regulatory requirements for improved transportation efficiency and safety. Based on information provided by the applicant, reasonably foreseeable future growth of existing methanol operations over the analysis period unrelated to the proposed action was included under the no-action alternative. For additional information, refer to the Master Response for Baseline and No-Action Alternative.

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, acknowledges that it is possible that another project could occur at the project site if the proposed action is not implemented and

that, depending on the nature of that project, some of the impacts could be similar to those under the proposed action. However, because this statement has led to misinterpretation of the baseline used in the Draft EIS analysis, it has been removed in the Final EIS.

Comment T8-20

The DEIS also states, without citation, that "[u]nder the no-action alternative, large commercial vessel trips are projected to increase between 2017 and 2037 due to increased trade of commodities." *See also* Imperium DEIS at p. 3.11-11, 3.12-15, 3.13-4; Westway DEIS at 3.11-11, 3.12-16, 3.13-4.

These statements are completely unsubstantiated and clearly designed to imply that any development or unknown future growth would have similar impacts to the proposed crude-by-rail terminals, undermining the DEIS's credibility.

Response T8-20

Draft EIS Chapter 3, Section 3.17.3.2, *Impact Analysis*, provides the rates used to arrive at the projected increase in large commercial vessel trips (for the channel capacity analysis). The moderate compound annual growth rates (CAGR) applied to present commodity volumes to reflect future commodity volumes and associated vessel trips were obtained from *The Pacific Northwest Marine Cargo Forecast Update and Rail Capacity Assessment Final Report* [1] prepared for the Pacific Northwest Rail Coalition. This report was commissioned by the Washington Public Ports Association (WPPA) and cosponsored by the Washington State Department of Transportation. These same rates were used and extended to 2037 (the original forecast was to 2030) by the U.S. Army Corps of Engineers.[2] The average commodity volume per vessel type was derived using 2012 commodity volumes and vessel numbers.[3] This ratio was then used as an adjustment to forecast further vessel numbers for each type of commodity. Tanker vessel numbers were forecast using the chemical CAGR rate (this forecast did not include a petroleum growth rate as the forecast did not include the proposed action and vegetable oil or biodiesel growth rate was assumed to be zero) of 6.8% and related ratio. Cargo (manufactured equipment and autos) vessel numbers were forecast using the manufactured equipment growth rate of 3.9% and related ratio, and so forth.[4]

Refer to the Master Response for Vessel Traffic Baseline and Projections for more information about how the baseline for the analysis of vessel traffic impacts was developed.

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[1] BST Associates and MainLine Management. 2011. *Pacific Northwest Marine Cargo Forecast Update and Rail Capacity Assessment*. Final Report. December. Prepared for Pacific Northwest Rail Coalition. Commissioned by the Washington Public Ports Association and cosponsored by the Washington State Department of Transportation.

[2] U.S. Army Corp of Engineers. 2014a. *Draft Supplemental Environmental Impact Statement for the Grays Harbor, Washington Navigation Improvement Project General Investigation Feasibility Study.* Appendix A, *Economic Analysis.* Seattle Corps District. January.

[3] U.S. Army Corps of Engineers2014b. Waterborne Commerce Statistics Center. Available: http://www.navigationdatacenter.us/wcsc/wcsc.htm. Accessed: December 6, 2014.

[4] U.S. Fish and Wildlife Service. 2014. *Grays Harbor Navigation Improvement Project, Grays Harbor, Washington Fish and Wildlife Coordination Act Report*. Appendix A. Table 9, Port of Grays Harbor Commodity Moderate Growth Projections. Lacey, WA. Prepared for the U.S. Army Corps of Engineers, Seattle District, Seattle, WA, and Port of Grays Harbor, Aberdeen and Hoquiam, WA.

Comment T8-21

5.0 SCOPE OF REVIEW

SEPA requires an environmental impact statement ("EIS") for any action that has a "probable significant, adverse environmental impact." RCW 43.21C.031(1). Significance means a reasonable likelihood of more than a moderate adverse impact on environmental quality." WAC 197-11-794.

"A proposal's effects include direct and indirect impacts caused by the proposal. Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as precedent for future actions." WAC 197-11-060(4)(d). The scope of impacts includes direct, indirect, and cumulative impacts. WAC 197-11-792. ''The range of impacts to be analyzed in an EIS (direct, indirect, and cumulative impacts, WAC 197-11-792) may be wider than the impacts for which mitigation measures are required of applicants." WAC 197-ll-060(4)(e). The environmental impact statement must address "reasonable alternatives" to the proposed action, including a "no-action" alternative, WAC 197-11-440(5). It is implicit in SEPA that an "agency cannot close its eyes to the ultimate probable environmental consequences of its current action." *Cheney v. City of Mountlake Terrace*, 87 Wn.2d 338, 344 (1976).

Importantly, the regulations specifically direct that an "agency shall not limit its consideration of a proposal's impacts only to those aspects within its jurisdiction, including local or state boundaries." WAC 197-11-060(4)(b). Indeed, SEPA constitutes a ringing affirmation of the connectedness of Washington with the rest of the planet. It speaks of "humankind" and "human beings" rather than just citizens of this state. RCW 43.21C.010. SEPA explicitly calls on responsible agencies to "recognize the world-wide and long-range character of environmental problems" and take steps to cooperate in "anticipating and preventing a decline in the quality of the world environment." RCW 43.21C.030(f); *Eastlake Comm. Coun. v. Roanoke Assoc.*, 82 Wn.2d 475, 487 (1973) (observing "unusually vigorous statement of legislature purpose ...to consider the total environmental and ecological factors to their fullest in deciding major matters") (emphasis added). Those regulations also recognize that environmental impacts do not end at the state's borders, and explicitly require consideration of the impacts of projects outside of the state's jurisdiction. WAC 197-11-060(c); *Cathcart-Maltby-Clearview Comm. Council v. Snohomish Cty*., 96 Wn.2d 201,209 (1981) (SEPA "also mandates that extra-jurisdictional effects be addressed and mitigated, when possible.").

Washington's courts and hearings bodies are only starting to grapple with these important issues, but the conclusions so far are consistent: indirect impacts of fossil fuel transportation projects, including transportation of the fossil fuels to and from proposed terminals, must be considered in the SEPA process. For example, in *Quinault Indian Nation v. Hoquiam*, 2013 WL 6062377 (Nov. 12, 2013), the Shorelines Hearings Board vacated mitigated determinations of non-significance ("MDNSs") for these two crude oil terminals for failing to adequately consider the cumulative and indirect impacts of rail and vessel traffic.

5.1 SCOPE OF RAIL ANALYSIS

Precedent from other ongoing SEPA processes for fossil fuel transportation projects with a rail component supports a broad scope for these DEISs. Ecology and other co-lead agencies have been clear that the scope of the EISs will include indirect impacts, some of which may appear distant from the projects themselves. For example, in announcing the scope of the EIS for the Gateway Pacific Terminal (coal export) near Bellingham, Ecology confirmed that the EIS would look at-in addition to the obvious onsite impacts like wetlands fill, habitat loss, and pollution-impacts of increased rail and

marine vessel traffic throughout the state and even beyond. *[Footnote: Available at http://www.ecy.wa.gov/geographic/gatewaypacific/gpt-faq.pdf. Transportation of coal for the project will be studied "to the point where the extraction of natural resources originates," albeit with less detail than within the state of Washington.]* The same is true for the proposed oil shipping terminal in Vancouver. *[Footnote: Energy Facility Site Evaluation Council, Scope of Draft EIS for Tesoro Savage Terminal (April 2, 2014) available at http://www.efsec.wa.gov/Tesoro%20Savage/20140403FinalSepaScope.pdf.]*

Here, however, the DEISs analyze the impacts of rail traffic and rail transportation only along the PS&P line from Centralia to Hoquiam. DEIS at S-4-5. This truncated analysis excludes issues on the BNSF mainline from the drill sites across the state of Washington, through many communities that will be impacted by these projects.

Response T8-21

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Comment T8-22

5.2 MARINE SCOPE

The scope of review for marine impacts is similarly truncated. The Imperium DEIS at p. S-4 to -5 states that only "[r]esources in and around Grays Harbor that could be affected by vessel transport" are generally analyzed. "Similarly, all vessel trips generated by the proposed action would travel through Grays Harbor along the Grays Harbor Navigation Channel between Terminal 1 and the Pacific Ocean. Therefore, these known corridors are the focus of the impact analysis related to rail and vessel transport." *Id*. This limited scope of review for marine impacts omits impacts to the Pacific coast and along the route taken by barges and tankers transporting oil.

Response T8-22

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from vessel transport—less than one trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Comment T8-23

5.3 CUMULATIVE IMPACTS

SEPA requires consideration of cumulative effects. WAC 197-110060(4)(e); WAC 197-11-330(3)(c) ("Several marginal impacts when considered together may result in a significant adverse impact."); *White v. Kitsap Cnty*., SHB No. 09-019 at 17 (2009) (cumulative impacts of a proposed action together with the impacts of pending and future actions should be considered when making a threshold determination). In Quinault Indian Nation v. Hoquiam, the SHB overturned MDNSs for these two crude-by-rail facilities explicitly because they failed to consider the cumulative effects of increased rail and marine vessel traffic from each other, and a third crude-by-rail project. Quinault, SHB No. 13-012c, Order on Summary Judgment (Dec. 9, 2013) at 18 ("agencies are required to consider the effects of a proposal's probable impacts combined with the cumulative impacts from other proposals").

First, addressing cumulative impacts in a separate section (Chapter 6 for both DEISs) is both confusing and at times misleading to the reader. Constant reference to prior discussions requires a back-and-forth between sections. Under SEPA, "environmental impact statements shall be readable reports, which allow the reader to understand the most significant and vital information concerning the proposed action, alternatives, and impacts." WAC 197-11-425.

Second, for the reasons discussed directly above, the cumulative impacts section fails to address many applicable cumulative impacts because the scope of review is too small. This is especially notable with respect to rail transportation, as none of the cumulative impacts of increased oil and coal unit train rail traffic along the BNSF main line is addressed. There are twelve crude-by-rail projects in Washington and Oregon that are either already built or at some stage of the permitting or construction process that will collectively add an additional twenty-four trains a day to already-congested rail lines. This is in addition to two major coal terminals that would add an additional thirty-six trains per day to the mix. The DEISs must fix this glaring error.

Response T8-23

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport in the extended study area qualitatively. Refer to the Master Response for Cumulative Impact Analysis for a description of the scope of the cumulative analysis.

Comment T8-24

Moreover, the DEISs chose a life of project length of 20 years, but did not explain this choice. WAC 197-11-060(4)(c) requires that "[i]mpacts shall include those that are likely to arise or exist over the lifetime of a proposal or, depending on the particular proposal, longer." 50 years seems a more reasonable lifespan for these major infrastructure projects. The DEIS must be supplemented with an explanation for the chosen review period.

Response T8-24

The Draft EIS analyzes impacts anticipated to occur over the lifetime of the proposed facility. Potential impacts were quantitatively evaluated in 2017—the anticipated first year of operation—and 2037 to account for future growth and development. This approach provides context to decision-makers about how the impacts of operations would evolve over a reasonably foreseeable period. This is particularly relevant for transportation-related impacts that can evolve over time because of unrelated increased growth, increased efficiency, and improved management and

infrastructure planning. This has been clarified in the Final EIS. Refer to the Master Response for Baseline and No-Action Alternative.

Comment T8-25

5.4 FAILURE TO ADDRESS CONSEQUENCES

Throughout the review, the DEISs fail to address the consequences of the risks and dangers discussed, both to the natural environment, to the people living and working in the region, to other users of impacted resources, or to economic concerns. For example, the DEISs dedicate a mere page to superficially acknowledging cumulative impacts to natural resources in the event of an oil spill. They do not address or analyze the recovery time of affected aquatic species (plant or animal), nor do they address or analyze the long-term impacts on natural resources and their respective habitats that are likely in the event of a spill. The Quinault Indian Nation provided extensive information on this, none of which was included or acknowledged.

Response T8-25

The risk analysis in the study area considers different spill scenarios related to the propose action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, a spill could occur at any location. Scenarios are based on assumptions about terminal, rail, and vessel operations (refer to the Master Response for the Risk Assessment Methods) and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Section 4.7 also acknowledges resources that could be adversely affected by an oil spill, fire, or explosion in the study area and has been revised to acknowledge the potential for more lasting impacts as the result of a spill. The geographic response plans, as referenced in Final EIS Chapter 4, Section 4.2, *Applicable Regulations*, provide additional information on sensitive resources that could be affected by a spill at specific locations in the study area. The plans also identify appropriate response strategies. Nonetheless, mitigation would not eliminate the possibility of an incident. Depending on the specific circumstances of an incident, the environmental impacts could be significant.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Comment T8-26

6.0 MITIGATION

Many affected environments sections mention possible impacts that are either not addressed in mitigation measures or not mitigated by suggested mitigation measures and are also not included in significant and unavoidable impacts without explanation. For example, both DEISs mention the possibility of ballast water discharge introducing invasive species, yet the mitigation measure for

this significant threat to the aquatic environment is monitoring. Westway and Imperium DEISs at p. 3.4-16. Monitoring is not mitigation - if monitoring activities found an invasive species that was already introduced it could have devastating effects on fisheries.

Response T8-26

Potential ballast water impacts on the aquatic environment are addressed in Draft EIS Chapter 3, Section 3.4, *Plants*, and Section 3.5, *Animals*. Existing federal and state regulations address ballast water management. The Washington State ballast discharge regulations (RCW 77.120.040 and WAC 220-150) include reporting, monitoring, and sampling requirements of ballast water; all vessels must submit nonindigenous species ballast water monitoring data. Washington Department of Fish and Wildlife may also board and inspect vessels under WAC 220-150-033 without advance notice to provide technical assistance, assess compliance, and enforce the requirements of Washington State ballast water management program laws and regulations. Penalties and enforcement of not complying with the regulations are covered in WAC 220-150-080. To further minimize the risk of ballast water on vegetation communities and animals, proposed mitigation is included in Sections 3.4 and 3.5 for the applicant to develop and implement a monitoring plan in consultation with Washington Department of Fish and Wildlife prior to the start of proposed operations. Refer to the Master Response for Mitigation Framework for an explanation of how mitigation measures were identified in the EIS.

Comment T8-27

7.0 ADEQUACY OF DEIS ENVIRONMENTAL REVIEW

An EIS must evaluate the likely impacts related to the project. WAC 197-11-060(4). Decision makers must provide a "detailed statement" of environmental impacts. RCW 43.21C.030(2)(c). SEPA requires full disclosure and "detailed" consideration of all affected environmental values. At its heart, SPEA is an "environmental full disclosure law." Norway Hill Preservation and Protection *Association v. King Cnty. Council*, 87 Wn.2d 267 (1976). The Norway Hill court also highlighted the legislature's intent that "environmental values be given full consideration in government decision making," and its decision to implement this policy through the procedural provisions of SEPA which "specify the nature and extent of the information that must be provided, and which require its consideration, before a decision is made." *Id*. at 277-78.

Environmental reviews under SEPA must identify significant impacts on the natural and built environment. WAC 197-11-440(6)(e). Such reviews must use sufficient information and disclose areas where information is speculative or unknown. WAC 197-11-080(1), (2). Where there is scientific uncertainty, Washington courts have required agencies to disclose responsible opposing views and resolve differences. These requirements feed into the ultimate standard of review for EISs, that, adequacy is based on a rule of reason, *Cheney v. Mountlake Terrace*, 87 Wn.2d 338, 344 (1976), and courts require reasonably thorough information disclosure and discussion, good data and analysis to support conclusions, and sufficient information to make a reasoned decision. *Klickitat County Citizens Against Imported Waste v. Klickitat County*, 122 Wn.2d 619,633 (1993). Sufficiency of the data is also assessed under the "rule of reason," which requires a "'reasonably thorough discussion of the significant aspects of the probable environmental consequences' of the agency's decision." *Weyerhaeuser v. Pierce Cnty*., 124 Wn.2d 26, 38 (1994) (citations omitted).

In making the similar assessment under NEPA, federal courts require agencies to take a "hard look" at environmental impacts. More specifically, for review of the NEPA claims, the Court must "ensure

that an agency has taken the requisite hard look at the environmental consequences of its proposed action, carefully reviewing the record to ascertain whether the agency decision is founded on a reasoned evaluation of the relevant factors." *Te-Moak Tribe v. Interior*, 608 F.3d 592, 599 (9th Cir. 2010) (quoting *Greenpeace Action v. Franklin*, 14 F.3d 1324, 1332 (9th Cir. 1992) (internal quotation marks and citations omitted)). This review must be "searching and careful." Ocean Advocates v. U.S. Army Corps of Engineers, 402 F.3d 846, 858 (9th Cir. 2005). It also is guided by a ''rule of reason" that asks ''whether an EIS contains a reasonably thorough discussion of the significant aspects of the probable environmental consequences.'' *Churchill County v. Norton*, 276 F.3d 1060, 1071 (9th Cir. 2001), amended by, 282 F.3d 1055 (9th Cir. 2002).

Washington Courts have employed the "hard look" doctrine directly or in other cases have required full disclosure and consideration of environmental values. See Pub. Util. Dist. No.1 of *Clark Cnty. v. Pollution Control Hearings Bd*., 137 Wash. App. 150, 158, 151 P.3d 1067, 1070 (2007); *Toward Responsible Dev. v. City of Black Diamond*, 179 Wash. App. 1012 review denied, 180 Wash. 2d 1017, 327 P.3d 54 (2014) (unpublished opinion) ("Courts review an EIS as a whole and examine all of the various components of[the] agency's environmental analysis . . . to determine, on the whole, whether the agency has conducted the required 'hard look."'); see also Coalition for a Sustainable 520 v. U.S. Department of Transportation, 881 F. Supp. 2d 1243, 1259 (W.D. Wash. 2012) (holding implicitly that "hard look" under NEPA sufficient for SEPA review). Where "hard look" is not discussed or employed directly, courts have required a "reasonably thorough discussion" of environmental impacts. See *Toward Responsible Dev. v. City of Black Diamond*, 179 Wash. App. (20 14); *PT Air Watchers v. State, Dep't of Ecology*, 179 Wash. 2d 919, 927, 319 P.3d 23, 27 (2014)(citing Norway Hill, 87 Wn.2d at 275) (requiring "full disclosure and consideration of environmental values").

As discussed in the sections below, the DEISs fail to provide the necessary hard look and reasonably thorough discussion of environmental impacts throughout their many pages. This is an overarching failure.

Response T8-27

Responses to specific concerns are addressed in the following Responses to Comments.

Comment T8-28

8.0 TREATY IMPACTS

The Quinault Indian Nation is a signatory to the Treaty of Olympia (1856) in which it reserved a right to take fish at its "usual and accustomed fishing grounds and stations" and the privilege of gathering, among other rights, in exchange for ceding lands it historically roamed freely.

Treaty rights are not granted to tribes, but rather are "grants of rights from them-a reservation of those not granted." *United States v. Winans*, 198 U.S. 371, 380-81 (1905). Treaties take precedence over conflicting state laws by reason of the Supremacy Clause of U.S. Constitution. Art. VI, Sect. 2; *Worcester v. Georgia*, 31 U.S. 515, 531 (1832). Treaties then are the supreme law of the land: "The right to resort to the fishing places in controversy was a part of larger rights possessed by the Indians, upon the existence of which there was not a shadow of impediment, and which were not much less necessary to the existence of the Indians than the atmosphere they breathed." Winans, 198 U.S. at 381 (1905) (emphasis added). The treaty-reserved right to take fish at usual and accustomed places is a property right protected by the Fifth Amendment. See, e.g., *Menominee Tribe*

of Indians v. United States, 391 U.S. 404, 411 (1968); *Muckleshoot v. Hall*, 698 F. Supp. 1504 (W.D. Wash. 1988).

In a landmark court case known as the "Boldt decision," a federal court confirmed that Indian tribes have a right to half the harvestable fish in state waters and established the tribes as co-managers of the fisheries resource with the *State of Washington. United States v. Washington*, 384 F. Supp. 312 (W.D. Wash. 1974). The Boldt decision affirmed that the Quinault usual and accustomed fishing areas include "Grays Harbor and those streams which empty into Grays Harbor." *Id*. at 374. In *United States v. Washington*, 873 F. Supp. 1442 (1994), a federal district court concluded that treaty rights include shellfish and that tribes are entitled to 50% of the harvestable shellfish on most Washington State beaches.

The Chehalis and the Humptulips Rivers and the Grays Harbor estuary provide the freshwater and marine habitat that supports chinook, chum, and coho salmon and steelhead of critical importance to the Quinault Nation's Treaty-protected terminal river fisheries within Grays Harbor. Grays Harbor nourishes other species of fish important to the Nation's Treaty protected fisheries such as White Sturgeon and Dungeness crab, an economically vital fishery on the Washington coast.

The Quinault have lived near and depended on Grays Harbor for generations. They have been called the Canoe people because of the importance of the ocean, bays, estuaries, and rivers to every aspect of tribal life. See generally Jacqueline M. Strom, Land of the Quinault (1990). Quinault fishers catch salmon, sturgeon, steelhead, halibut, cod, crab, oysters, razor clams, and many other species in Grays Harbor.

Fish and shellfish are a source of social, economic and cultural values. Many tribal fishers derive their entire economic livelihood from fishing and shellfishing. Salmon has particular historic significance as a vital cultural and economic resource of the Quinault people.

Salmon represent a means for employment in fishing, guiding and processing jobs. Often fish are used in trade between tribal members for other foods or goods. Salmon and razor clams are communally served at social and community events, such as ceremonies and funerals. Often, salmon and other fish and shellfish are shared with family members, elders and others in the community that do not, or can no longer, fish. Resource Dimensions, Exhibit 3, at 56.

Fishing is also a way to educate younger generations in life lessons, both as a means to pass on traditional knowledge and to perpetuate ceremonial values. There are also spiritual values inherent in fishing, such as thanksgiving for the ability to utilize the resources. Stewardship and protection of natural resources for future generations, including fish and shellfish resources, are central to the Quinault people's identity. This necessarily includes preserving ideal habitats for all species. Id.

Quinault weavers have gathered materials from the Grays Harbor area for many generations. Sweetgrass, cattail, and other grasses and willow gathered from the Bowerman Basin are used by the Quinault as a material in the traditional weaving of baskets and mats and for ceremonial purposes. Weaving is as integral to contemporary Quinault culture as it was in the past. Bowerman Basin, located in Grays Harbor to the north of the proposed Westway and Imperium projects, is one of the two major areas remaining in Washington with large sweetgrass populations. Sweetgrass is a key component, and participant, in the highly complex estuarine ecosystem processes. Its loss due to a potential oil spill would significantly harm juvenile salmonid and bird habitats, and estuary function, which would have huge negative implications for the Quinault. *Id*.

Response T8-28

Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, describes tribal resources in the study area, including resources important to the Quinault Indian Nation and the Confederated Tribes of the Chehalis Reservation. It defines tribal resources as the collective rights and access to traditional areas and times for gathering resources associated with a tribe's sovereignty or formal treaty rights. The information contained in this section was derived from several sources identified in Section 3.12.3.1, *Information Sources*, including communication with the Confederated Tribes of the Chehalis Reservation, Quinault Indian Nation, tribal fishing committees, EarthJustice, and the 2015 economic study on the impacts of oil transport on the Quinault Indian Nation prepared by Resource Dimensions.

Chapter 3, Section 3.12.2, *What laws, regulations, and treaty rights apply to tribal resources?*, describes the laws, regulations, court orders, and treaties that apply to tribal resources, including treaty-reserved fishing rights, in the study area. The treaties and federal court cases referenced in the comment are included in this section and were considered as part of the regulatory framework for the Draft EIS analysis.

Section 3.12.4, *What tribal resources are in the study area?*, describes the Quinault Indian Nation and the Confederated Tribes of the Chehalis Reservation, their historical use of the study area, and current use of resources in the study area including plants or fish used for commercial, subsistence, and ceremonial purposes. This section acknowledges the treaty-reserved fishing, gathering, and hunting rights of the Quinault Indian Nation and the importance of access to traditional fishing and gathering areas to the tribe. As described in the section, Quinault Indian Tribe have treaty-reserved rights for salmon, halibut, lingcod, rockfish sablefish, sardines, and shellfish; a federal ruling in 1994 (*United States v. Washington,873 F. Supp. 1422*) concluded that the Quinault Indian Nation's treaty-reserved rights extend to shellfish, for which they are entitled 50% harvestable catch on most Washington State beaches. In addition to fisheries, the EIS acknowledges Grays Harbor as a traditional gathering area for the Quinault Indian Nation where sweetgrass, cattail, other grasses, and willow are collected for weaving.

Final EIS Chapter 4, Section 4.7.1.7, *Tribal Resources*, reflects additional information on the potential impacts on tribal resources from an oil spill. Further information on resources, including fish, plants and animals, that could be affected by an oil spill are described in detail in Chapter 3.

Comment T8-29

8.1 IMPACTS ON FEDERALLY-GUARANTEED TREATY FISHING AND GATHERING RIGHTS FROM INCREASED RAIL AND VESSEL TRAFFIC AS WELL AS INCREASED OIL SPILL RISK.

The DEISs for Westway and Imperium both conclude that "increased vessel traffic related to the proposed action in Grays Harbor could increase the potential for conflict with fishing areas and access to fishing areas for the Quinault Indian Nation," Westway DEIS at S-42, and that these impacts were unavoidable and significant. *Id*. (Section 3.12). Yet even this finding of significant and unavoidable impact is too conservative, as the DEIS fails to address protection of Chehalis River and Grays Harbor estuarine habitat, instead addressing only impacts to in-river and mouth-of-river-fishing. Westway DEIS at 3.12.4.3.

Response T8-29

Draft EIS Chapter 3, Section 3.12.5.2, *Proposed Action*, acknowledges that vessel activity related to routine operation of the proposed action could affect the ability of the Quinault Indian Nation to access tribal fisheries in Grays Harbor and to thereby meet their seasonal quotas. The Draft EIS does not make a determination of significance related to tribal resources or treaty rights. Section 3.12.8, *Would the proposed action have unavoidable and significant adverse impacts on tribal resources?*, states that because factors besides vessel operations affect fishing opportunities, such as the number of fishers, fish distribution, timing, and duration of fish windows, the extent to which vessel operations related to the proposed action would affect tribal fishing is difficult to quantify. However, as stated in the section, no mitigation measures would completely eliminate the possibility of impacts on fishing resources resulting from vessel operations related to the proposed action.

Draft EIS Section 3.12.4.5, *Grays Harbor*, describes the fisheries within the Grays Harbor estuary, and Section 3.12.5.2 describes the potential impacts from construction and routine operation of the proposed action on tribal fisheries, including within the Grays Harbor estuary. The section acknowledges the potential for small spills to have an impact on water quality and aquatic habitat in Grays Harbor and along the Chehalis River. Additional discussion on the impacts on Grays Harbor estuary habitat and the Chehalis River is provided in Section 3.3, *Water*, and Section 3.4, *Plants*. As noted in these sections, construction and operation activities would be required to comply with water quality pollution controls and other regulations and therefore would not be expected to result in any unavoidable and significant adverse impacts on Grays Harbor.

Impacts associated with oil spills, preventative measures and mitigation are described in Chapter 4, *Environmental Health and Safety*.

Comment T8-30

Statements throughout the DEIS support the conclusion that increased traffic caused by the expansion will disrupt tribal fishing. See Westway DEIS at 3.17.5.2: “one of the prime commercial fishing areas is located in the navigation channel east of the Hoquiam River. Access to this area would be restricted during vessel loading and tank vessel transits”; at 3.17.43 ''There can be as many as 400 or more commercial, tribal and recreational vessels in the harbor during peak fishing times . . . ”; at 3.17.43 “All vessels fishing in the navigation channel may have to move gillnets out of the way or risk damage or loss”; at 3.17.43 “The marina [Westport Marina] is known as Washington State's fish landing port . . .”.

The DEISs inappropriately minimize these impacts by assuming fishers can adjust their fishing efforts to other areas in Grays Harbor and the Chehalis River. This assumption discounts the explanations of treaty fishing in the Chehalis that were provided to the Department of Ecology by letter from the Quinault Indian Nation on May 20, 2015, explaining the unique fishing techniques employed by Chehalis fishers. It appears this information was ignored.

As explained, Quinault fishers utilize gillnet fishing techniques to harvest the salmon and white sturgeon resources in the Chehalis Basin. Sizes of gillnets within Quinault-managed fisheries can range from a length of 10 to 1,200 feet and carry depths from 2 to 75 feet. The depths of different nets can be specific to the depth and condition of the fishing area for which the net is intended. Different stretches of river channel have different depths and underwater obstructions resting on the river bottom (i.e. rocks, stumps, trees, etc.) that can damage nets. Therefore, some nets are only designed and built for specific areas and cannot be fished in other locations. Fishers cannot simply

move their nets to avoid interference with oil vessels because the nets would not be suited to other locations.

Response T8-30

The Draft EIS does not make a determination of significance or nonsignificance related to tribal resources or treaty rights. Final EIS Chapter 3, Section 3.12.4.4, *Grays Harbor*, has been revised to clarify differences in net design and size. Section 3.12.5.2, *Proposed Action, Operation*, *Vessel*, has been revised to explain that tribal fishers would need to retrieve gear and either wait for the vessel to transit the area or delay deploying gear until the vessel has transited the area. This section was also revised to clarify that the amount of time to retrieve a net is variable depending on the amount of fish and debris in the net.

Comment T8-31

Similarly, the DEISs fail to address or analyze impacts to fishers who retrieve nets and gear to avoid interference with vessels. As explained in the Quinault Indian Nation's letter to the Department of Ecology dated May 20, 2015, a 600-foot drift-net that does not carry any fish or debris can be retrieved from the water in less than 5 minutes - at the quickest. In contrast, upwards of 300 salmon can be caught in an average length drift-net at any one time - with hydraulic machinery, instances like these can take upwards of two hours to clear fish and completely retrieve the net from the water. Retrieval times can easily double when fishers are pulling nets by hand. The active fishing vessel operator's abilities to respond to unanticipated conditions or unanticipated commercial vessel movements is extremely limited compared to other vessels operating in Grays Harbor, even given the aforementioned careful attention a vessel operator takes while fishing. Although Quinault drift fishers retrieve their deployed nets from the water as expeditiously as possible in order to avoid any accidents or damage to fishing gear, a lost fishing opportunity inevitably occurs.

The DEISs make the erroneous assumption that Quinault fishers all come from the Reservation to fish in Grays Harbor and the Chehalis and will therefore not be delayed by train crossings. As explained in the Quinault Indian Nation's letter to the Department of Ecology of May 20, 2015, the fleet of Quinault vessels that fish the Chehalis, Areas 2A, 2A-l and 2D either access the area from the Quinault moorage location near the QMart in the Lower Wishkah River just north of the highway and railway bridges entering Aberdeen, or from various boat ramps located along the Grays Harbor fishing areas that can handle the various sizes of vessels utilized. Authorized buying agents will purchase and transfer fish at boat launches including the 28th Street boat launch located in Hoquiam, the Pakonen boat launch located across from the mouth of the Wishkah River, the Cosi Boat Launch located in Cosmopolis or the boat launch at Friends Landing near Montesano. During the peak salmon run entry periods, Quinault fishers can make anywhere from two to six trips in a 24-hour period to land catches.

Response T8-31

Draft EIS Chapter 3, Section 3.12.5.2, *Proposed Action, Operations, Rail*, addresses impacts of rail traffic on access by tribal members to the Quinault fishing sites. Except for the Friends Landing launch, all other launches referenced by the commenter can be accessed by multiple roadways or do not require crossing the rail line. Final EIS Section 3.12, *Tribal Resources*, has been revised to add Friends Landing launch to the list of sites that require use of a PS&P rail line grade crossing. As discussed in Draft EIS Section 3.16, *Vehicle Traffic and Safety*, for the majority of the rail line,

including the rail crossing to Friends Landing launch, the increase in blockages would not result in a substantial decline in the level of service. Although the potential for individual tribal member to encounter a train at any PS&P rail line grade crossing would increase to four times per day on average, compared to three times per day under the no-action alternative, the likelihood and duration of an individual experiencing a delay would be similar to the no-action alternative.

Comment T8-32

Further, such delays could interrupt and impede any individual or firm conducting business activity proximate to the proposed train route. For example, Treaty commercial fishers needing to access their fishing areas, or bring their catch to a processor, may be prevented from fishing or from being able to sell their catch prior to spoilage. Quinault's natural resources enforcement staff could be adversely affected if the 28th Street boat launch is blocked by rail or rail-related traffic. Resource Dimensions, Exh. 3 at 8. A derailment could potentially delay fishers from reaching their fishing areas, and with no net in the water no revenue is generated. This could cause fishers to miss the most productive fishing times (slack tides, per interviewees). Additionally, in terms of transporting catch for sale, delays at crossings would increase the time the catch is remaining exposed to the elements in crates, potentially affecting whether the catch is purchased by the processor, and the value of the catch. Id. at 102.

The importance of river and marine habitat for fish and wildlife is discussed further in the Fish and Wildlife section of these comments below, as well as in the Direct Testimony of James E. Jorgensen, Exh. 5, and Testimony of Ervin Joseph Schumacker, Exh. 6, both submitted in prior proceedings about these projects before the Shorelines Hearings Board. Additionally, the Resource Dimensions report at Exhibit 3 goes into great depth about the importance of fish and shellfish to Quinault fishers-economically, culturally, and spiritually. Treaty resources, including fish and plants, supported by the Pacific Ocean, the Pacific coast, Grays Harbor, and its rivers and tributaries are inextricable from the Quinault people's traditional and modern ways of life. The social, cultural and economic values provided by Treaty resources have been cherished and handed-down through the generations. Today, the importance of these resources, and their guarantee by Treaty, remains of utmost importance to the Quinault people, as “The Quinault people are acutely aware of these special gifts and thank the Creator for his offerings,” (James and Chubby, 2002). Resource Dimensions, Exh. 3 at 55.

Response T8-32

Final EIS Chapter 4, Section 4.7.1.7, *Tribal Resources*, clarifies potential impacts on tribal resources in the event of an incident related to the proposed action, including exclusion of tribal members from gathering traditional plant material or fishing traditional areas during the incident response, the consumption of contaminated shellfish and fish following an oil spill, and extended fishery closures or restrictions to protect tribal members and the general public (i.e., fish sold to the public) from consumption of contaminated shellfish and fish.

Comment T8-33

The proposed mitigation measures (Imperium DEIS at 3.12.7.1) are wholly inadequate, as they simply call for coordination and possible adjustment of schedules to minimize conflict with fishing schedules. These proposed mitigation measures ignore the legal supremacy of treaty rights or the practical implications to limiting treaty harvest and impacting treaty rights. Even the DEISs

acknowledge that "[n]o mitigation measures would completely eliminate the possibility of impacts to fishing resources because of vessel operations related to the proposed action." Imperium DEIS at 3.12.8.

Response T8-33

Comment acknowledged.

Comment T8-34

8.2 IMPACTS ON HISTORIC AND CULTURAL RESOURCES ONSITE AND ALONG RAIL LINE.

As succinctly explained by the Washington Department of Archaeology and Historic Preservation in its DEIS comment letter dated September 3, 2015, its experts "disagree with your consultant's assertion that these deposits have a low probability to hold significant archaeological materials." The Quinault Indian Nation submitted several references to support the high likelihood that Grays Harbor is a site containing archeological and/or cultural resources. See, letter to Department of Ecology from Quinault Indian Nation, May 20, 2015, and Exhibits G through P attached thereto.

Response T8-34

The Draft EIS acknowledges that the shores of Grays Harbor were important habitation and resource gathering areas, with habitations and fishing facilities being the most likely to leave a robust archaeological trace. Appendix J, *Cultural Resources Technical Report*, reports that the potential for encountering archaeological sites is based on the depth of proposed action-related ground-disturbing activities that would result in the excavation of sediments relative to the depth of anthropogenic fill.

As indicated in Appendix J, although buried intertidal sediments are present at the project site, only one of the proposed action-related ground-disturbing activities would extend below the depth of anthropogenic fill—the driving of piles—and this activity would not result in the excavation of sediments and has associated access-related limitations. The conclusion is based on subsurface information obtained at the REG (formerly Imperium Terminal Services) site via both geoarchaeological cores and mechanically excavated trenches and at the project site via geoarchaeological cores.

In recognition of the limitations associated with exclusively using geoarchaeological cores at the project site, Chapter 3, Section 3.11.7.1, *Applicant Mitigation*, identifies a measure for monitoring of ground-disturbing activities that extend to depths greater than 15 feet below the current ground surface by a qualified professional archaeologist. This depth was selected because it is the point at which the interface between anthropogenic fill and intertidal sediments becomes ambiguous. However, except for pile driving, which would not result in the excavation of sediments and therefore monitoring would be of little benefit, ground-disturbing activities for the proposed action are not anticipated to extend to this depth. Based on this information, Appendix J states that the proposed action has limited potential for encountering as-yet undocumented archaeological sites.

Comment T8-35

8.3 IMPACTS TO TRIBAL RESOURCES

By signing the Treaty of Olympia, the Quinault Indian Nation reserved not only fishing and gathering rights, but also the right to hunt on open and unclaimed lands. While the proposed DEISs address the tribal resource of fisheries there is no mention of treaty hunting rights or analysis of impacts on tribal treaty hunting rights. Building or increasing the use of rails can hinder the movement of wildlife, particularly deer and elk. The increase of rail traffic from the proposed projects will cause stress and contribute to increased mortality rates in wildlife populations. Decreased wildlife movement will result in lower immigration rates that will lead to more habitat fragmentation and result in lower wildlife populations. The proposed rail line was not analyzed for impacts to wildlife connectivity, a critical element to supporting tribal treaty hunting rights. While the most popular species Quinault members rely on to provide food for tribal families are deer and elk, migratory waterfowl also play an important sustenance and cultural role.

Response T8-35

Final EIS Chapter 3, Section 3.12.4.3, *PS&P Rail Line*, has been revised to acknowledge the importance of wildlife and particularly deer, elk, and waterfowl to tribal treaty hunting. Section 3.12.5.2 *Proposed Action*, has been expanded to include the following conclusions with respect to wildlife impacts from increase traffic along the PS&P rail line. Wildlife connectivity along the rail line is already affected under existing conditions. Moreover, the rail line travels adjacent to developed areas and along and immediately adjacent to US 12 and Monte Elma Road for significant distances in the study area, and in some areas between these two transportation corridors. These developed areas and other transportation corridors contribute to the already compromised wildlife connectivity and fragmentation in the study area.

Given baseline conditions, increased rail traffic (1.25 unit train trip per day) under the proposed action would not have a significant impact on wildlife connectivity and fragmentation.

Comment T8-36

The DEISs fail to mention that treaty fishing and gathering access would be limited during clean-up of damaged infrastructure in the event of a spill, explosion or fire, which could persist for a significant period of time.

The DEISs fail to mention or address the spiritual and cultural importance of the treaty rights and resources to the Quinault, or address the impacts to those values in the event of interference in use or destruction of those resources due to an oil spill.

Response T8-36

Final EIS Chapter 4, Section 4.7.1.7, *Oil Spills, Fires, and Explosions*, reflects revisions to address impacts on the tribal resources specific to their cultural, economic and subsistence significance. The revisions address impacts on treaty-reserved access to these resources and potential impacts of an oil spill, fire, or explosion to Quinault fishing seasons and harvest. The revisions acknowledge that such an event could result in immediate exclusion of fishers from the area and potential long-term closure of fisheries—to remove spilled oil and ensure seafood safety—potentially causing lasting impacts on the survival of shellfish and fish, affecting number available for future harvest. Moreover, the revisions acknowledge the impact of a spill, fire, or explosion on the immediate and potential long-term access to accustomed areas for the gathering of plant material and hunting of waterfowl.

Comment T8-37

Additionally:

Inconsistencies in the tribal resources section make it difficult to assess the accuracy of impacts. Specifically, the number of new vessels is discussed with inconsistent language. The fourth paragraph of lmperium's DEIS at p. 3.12-19 states, "Vessels related to the proposed action would transit this portion of the navigation channel eight times per week on average; for comparison, large commercial vessels would transit this portion of the channel approximately eight times per week on average under the no-action alternative." There is no stated difference in number of vessels transiting the channel between the proposed action and the no action alternative.

Imperium DEIS p. 3.12-19 (and elsewhere throughout the document) states "Operation of the proposed action at maximum throughput would result in a maximum 400 tank vessel trips per year through Grays Harbor, compared to 436 large commercial vessel trips per year projected under the no-action alternative." The accompanying footnote states "Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year)." The footnote suggests that the no-action alternative would have 14 vessel trips per year instead of the 436 implied in the paragraph above.

If the main text is accurate, it states that the proposed action would have 400 vessel trips and the no action alternative would have 436 vessel trips; there would be fewer vessel trips under the proposed action. This is disputed by the following sentence, however, which states ''This increase in vessel trips related to the proposed action could have an impact on tribal resources ..." (Imperium DEIS at p. 3.12-19).

> Imperium DEIS at p. 3.1-22 restates the same information slightly differently: "Operation of the proposed action at maximum throughput would add 400 tank vessel trips through the harbor per year to the 436 large commercial vessel trips under the no-action alternative." This language suggests a total of 836 trips.

Response T8-37

The comment is specific to the REG (formerly Imperium Terminal Services) Expansion Project Draft EIS and would be addressed in the responses to comments as part of the Final EIS for that project. With regard to the proposed action, operation at maximum throughput would result in an additional 238 tank vessel trips per year through Grays Harbor, compared to 436 large commercial vessel trips per year projected under the no-action alternative. Refer to Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*.

Comment T8-38

The DEISs incorrectly assume that construction of the proposed action would have no impact on tribal resources (Imperium DEIS at p. 3.12-16, Westway DEIS at p. 3.12-17). The assumption is predicated on successful mitigation measures for noise impacts caused by impact pile drivers. The mitigation measure states "If the accumulated sound exposure level is exceeded at the closest distance, monitoring will be moved to a distance of 210 feet from the pile driving. If on any given day the accumulated sound exposure level threshold is exceeded at that distance, pile driving for that day will be stopped and continued the next day." This statement implies that 210 feet is not the closest distance (because initial monitoring was conducted at the closest distance). So impact pile driving will only cease if accumulated sound exposure levels are exceeded at some farther distance.

Therefore, accumulated sound exposure at the closest distance could continue unmitigated. Imperium DEIS at p. 3.5-20 states "Exposure to high levels of underwater noise can cause changes in behavior [to fish] and result in possible injury (Popper et al. 2006; Popper and Hastings 2009a, 2009b)." Any injury to fish would impact tribal resources. The mitigation measure is also contradicted by the statement that impact pile driving would last 2-3 months (Imperium DEIS at p. 2-15 and Westway DEIS at p. 2-11).

Response T8-38

Draft EIS Chapter 3, Section 3.5.5.2, *Proposed Action, Construction, Noise*, addresses potential impacts on aquatic species from underwater noise and pressure generated during pile driving (both impact hammer and vibratory) at the project site. The closest water body, the Chehalis River, is located approximately 235 feet away from the nearest pile. Underwater noise from terrestrial pile driving (there would be no in-water pile driving) would not exceed the established peak and accumulative noise thresholds for potential to harm fish at this distance. Therefore, there would be no impact on tribal resources related fish impacts from pile driving. Final EIS Section 3.5.5.2 has been revised to clarify that the conclusion of no impact is specific to pile driving. The remainder of the comment related to mitigation is applicable only to the REG (formerly Imperium Terminal Services) project and would be addressed in responses to comments as part of the Final EIS for that proposed action.

Comment T8-39

The DEISs underestimate interactions between tribal fishers and vessels. Imperium DEIS at p. 3.12-16 and Westway DEIS at p. 3.12-18 state "Depending on the specific circumstances of each interaction (e.g., chance of a vessel calling during an open fishing window, distribution of the fish, number of fishers on any given day), it is difficult to predict whether increased occupancy at Terminal 1 would significantly affect the tribe's ability to meet the treaty allocation under their current practices. If a vessel is at berth during the fall fishery, Quinault fishers have the option to fish longer (complete more drifts) or may choose to fish other preferred locations in Grays Harbor (such as other portions of the navigation channel, farther away from the shoreline or father upstream). However, opportunities to relocate during intense fishing periods may be limited if the other areas are occupied by fishers. Implementation of the mitigation described in Section 3.12.7.2, *Applicant Mitigation*, would reduce the potential impacts on treaty tribal fishing."

The Quinault Indian Nation disagrees that this paragraph does not indicate significant impacts to treaty resources.

Response T8-39

Final EIS Chapter 3, Section 3.12.4, *What tribal resources are in the study area*? reflects clarification related to the differences in net design and size and to explain that, because fishing gear design is customized to the fishing location, tribal fishers could not simply relocate to other fishing areas and deploy the same gear. Final EIS Chapter 3, Section 3.12.5.2, *Proposed Action*, reflects clarification related to the potential of transiting and docked vessels to affect the tribe's ability to access treaty resources. Implementation of the mitigation proposed in Section 3.12.7.2, *Applicant Mitigation*, could reduce the potential impacts on treaty tribal fishing, but would not completely eliminate the potential for impacts on tribal resources.

Comment T8-40

Logical errors in preceding paragraphs contribute to these conclusions. For example, Imperium DEIS at p. 3.12-17 states that Terminal 1 would be occupied up to 200 days per year. This assumes that all 400 vessel calls (Imperium DEIS at p. 2-13) *[Footnote: see discussion of vessel call inconsistencies on pg. 22]* will be tank barges that have a 24-hour occupancy period. Some of the vessel calls would be by Panamax class vessels, which have a 48-hour occupancy period. It is possible that Terminal 1 would be occupied by more than 200 days per year *[Footnote: Footnote 12 on pg. 2-13 indicates that 100% tank barges were assumed because with less capacity than Panamax tankers, more trips would be required. It is unclear what the balance is between vessel size, occupancy, and number of trips],* which means that there would be a vessel at the terminal more than 4 days per week.

Response T8-40

This comment is specific to the REG (formerly Imperium Terminal Services) Expansion Project EIS and would be addressed in responses to comments in the Final EIS for that project. Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, describes Terminal 1 berth occupancy related to the proposed action. Based on capacities of the vessels considered in the analysis, 100% tank barges results in the highest level of berth occupancy. At maximum throughput, vessels related to the proposed action would occupy the berth a maximum of 119 days. Added to no-action vessels, the berth would be occupied an estimated 177 days, well below the 328 days of estimated berth availability.

Comment T8-41

Analysis of impacts is based on evenly spaced vessel calls throughout each week and year. There is no evidence that vessel calls would be evenly spaced, and impacts could be substantially higher if Terminal 1 is occupied every day. For the last two years, U.S. crude oil supply was highest in October.*[Footnote: U.S. Energy Information Administration. 2015. U.S. Product Supplied of Crude Oil and Petroleum Products. Accessed September 1, 2015. Available at http://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=PET&s=MTTUPUS1&f=M.]* This indicates that the highest levels of crude oil supply, and therefore oil transport, may coincide with peak salmon fishing seasons (Imperium and Westway DEIS p. 3.12-10).

Response T8-41

As noted in the comment, the type of vessel and distribution of project vessel activity cannot be predicted due to the variability of market conditions. The mean values presented in the Draft EIS analysis provide a reasonable estimate of daily vessel activity considering that the vessels would call at a single dock and be restricted to a single channel. The nationwide data for crude oil and petroleum production referenced in the comment cannot be directly compared to the distribution of tank vessel activity related to the proposed action.

Comment T8-42

Imperium DEIS at p. 3.12-16 to 3 p. 12-17 and Westway DEIS at p. 3.12-18 state that a docked vessel would occupy 20 to 25% of the navigation channel. Again, this assumes the width of a tank barge. A Panamax tanker is 28ft. wider and would occupy more of the channel.

Response T8-42

The percent range of channel width occupied by vessels at berth at Terminal 1 under the proposed action, presented in Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, is based on maximum widths of a typical 550-class tank barge (78 feet) and a Panamax class tanker (approximately 106 feet).

Comment T8-43

8.4 POTENTIAL SIGNFICANT ADVERSE IMPACTS TO TRIBAL RESOURCES CANNOT BE MITIGATED.

Even with the above errors and omissions, the DEISs find significant impacts to tribal treaty resources that cannot be mitigated. Westway DEIS at S-42 ("Increased vessel traffic related to the proposed action in Grays Harbor could increase the potential for conflict with fishing areas for the Quinault Indian Nation compared to the no-action alternative."); *id*. at S-61 (same for cumulative impact analysis). Ecology and Hoquiam should use these findings to deny the requested permits.

Response T8-43

Comment acknowledged.

Comment T8-44

9.0 RAIL TRANSPORTATION

Crude oil is a hazardous material as defined by the U.S. Department of Transportation [Footnote: 49 C.F.R. § 172.101. Hazardous materials are materials that have been determined by the Secretary of Transportation to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce. See 49 C.F.R. § 171.8], and crude has certain properties that make it uniquely dangerous. First, it is a liquid, meaning that it can migrate away from the site of an accident or other release and travel into communities, down waterways, or into groundwater. Crude oil is also generally less flammable than other hazardous liquids (like ethanol and gasoline), meaning that it is more likely to migrate some distance before reaching an ignition source and catching fire. [Footnote: See Exh. 8, BP West Coast Products LLC, "Material Safety Data Sheet – Crude Oil," May 13, 2002. (flash point of 20° – 90° F)].

Response T8-44

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods.

Comment T8-45

Second, unlike other liquids transported by rail, unrefined crude oil contains a wide range of contaminants, including sulfur and arsenic; toxic metals like mercury, nickel, and vanadium; and organic compounds like phenols, ketones, and carboxylic acids. *[Footnote: See Exh. 9, EPA,*

"Screening-Level Hazard Characterization, Crude Oil Category," Mar. 2011.] Hydraulic fracturing, or "fracking" contributes an additional suite of contaminants, including hydrochloric acid and in some cases hydrogen sulfide*. [Footnote: Exh. 10, Abrams, L., "Fracking chemicals may be making oil more dangerous," Aug. 13, 2013.]* Indeed, the Federal Railroad Administration has observed "an increasing number of incidents involving damage to tank cars in crude oil service in the form of severe corrosion of the internal surface of the tank, manway covers, and valves and fittings," and suggested that this involves contaminated oil. *[Footnote: See Exh. 11, Herrmann, T., FRA, Letter to Jack Gerard, American Petroleum Institute, July 29, 2013 at 4.]*

Response T8-45

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods.

Comment T8-46

Domestic crude oil production has been undergoing a major boom in recent years, chiefly because of the increase in fracking, and primarily around the Bakken formation in and around North Dakota. U.S. Energy Information Administration ("EIA") Administrator Adam Sieminski testified in 2013 that:

> Domestic oil production in the United States has increased significantly, and at 7.4 million barrels per day as of April 2013 is now at the highest level since October 1992. Over the five year period through calendar year 2012, domestic oil production increased by 1.5 million barrels per day, or 30%. Most of that growth occurred over the past 3 years. Lower 48 onshore production (total U.S. Lower 48 production minus production from the federal Gulf of Mexico and federal Pacific) rose more than 2 million barrels per day (bbl/d), or 64%, between February 2010 and February 2013, primarily because of a rise in productivity from oil-bearing, low-permeability rocks. *[Footnote: Exh. 12, Hearings Before the Committee on Energy and Natural Resources, U. S. Senate, July 16, 2013 (Statement of EIA Administrator Sieminski at 2).]*

This dramatic increase in production has caused a corresponding boom in crude-by-rail. In May 2013, the Association of American Railroads ("AAR") profiled how crude production and crude-by-rail are undergoing twin booms:

> Historically, most crude oil has been transported via pipelines. However, in places like North Dakota that have seen huge recent increases in crude oil production, the existing crude oil pipeline network lacks the capacity to handle the higher volumes being produced. Pipelines also lack the operational flexibility and geographic reach to serve many potential markets. Railroads, though, have capacity, flexibility, and reach to fill the gap.
>
> Small amounts of crude oil have long been transported by rail, but since 2009 the increase in rail crude oil movements has been enormous. As recently as 2008, U.S. Class I railroads (including the U.S. Class I subsidiaries of Canadian railroads) originated just 9,500 carloads of crude oil. By 2011, carloads originated were up to nearly 66,000, and in 2012 they surged to nearly 234,000. . . . In the first quarter of 2013, Class I railroads originated a record 97,135 carloads of crude oil,

> 20 percent higher than the 81,122 carloads originated in the fourth quarter of 2012 and 166 percent higher than the 36,544 carloads originated in the first quarter of 2012.
>
> Crude oil accounted for 0.8 percent of total Class I carload originations for all of 2012, 1.1 percent in the fourth quarter of 2012, and 1.4 percent in the first quarter of 2013. It was just 0.03 percent in 2008.
>
> Assuming for simplicity, that each rail tank car holds about 30,000 gallons (714 barrels) of crude oil, the 97,135 carloads originated in the first quarter of 2013 equal approximately 762,000 barrels per day moving by rail. As a point of reference, according to EIA data, total U.S. domestic crude oil production was approximately 7.1 million barrels per day, so the rail share is around 11 percent—up from a negligible percentage a few years ago. *[Footnote: Exh. 13, Association of American Railroads, "Moving Crude Petroleum by Rail," May 2013, at 3-5.]*

As also noted by AAR, "[t]he Bakken region has accounted for the vast majority of rail crude oil originations in recent years." *[Footnote: Exh. 14, Association of American Railroads, "U.S. Rail Crude Oil Traffic," June 2015, available at https://www.aar.org/BackgroundPapers/US%20Rail%20Crude%20Oil%20Traffic.pdf.]* According to the North Dakota Pipeline Authority, around 700,000 barrels of crude oil per day were moving out of the area by rail in early 2015, down from a peak of around 800,000 barrels per day in late 2014. *[Footnote: Footnote 17: See North Dakota Pipeline Authority http://northdakotapipelines.com/directors-cut/ Monthly Updates for April 2013-August 2015; Exh. 15, "How oil is transported from North Dakota's Williston Basin," THE GLOBE AND MAIL, Dec. 2, 2013.]* From 2008 to 2014 there has been an increase of nearly 5,100 percent in U.S. Class railroads carrying crude oil (see Figure 1). *[Footnote: Exh. 14, Association of American Railroads, "U.S. Rail Crude Oil Traffic," June 2015, available at https://www.aar.org/BackgroundPapers/US%20Rail%20Crude%20Oil%20Traffic.pdf.]* As shown in the data from AAR *[Footnote: See Exh. 16, Association of American Railroads, "AAR Reports Record Second Quarter Crude-by-Rail Data; Decreased Weekly Rail Traffic," Aug. 29, 2013; Exh. 17, "AAR Reports October and Weekly Rail Traffic Gains, 3Q Crude Oil Up Year Over Year," Nov. 7, 2013]*, crude-by-rail volumes increased rapidly from 2009 into the second quarter of 2013, then dipped for several months as a result of crude pricing that encouraged a shift to pipeline transport. Later in 2013, pricing was again favorable for rail and crude production continues to increase, such that crude-by-rail volumes rebounded. *[Footnote: Fielden, Sandy, RBN Energy, "On the Rails Again? – Bakken Crude Rail Shipments Return to April Highs," http://www.rbnenergy.com/on-the-rails-again-bakken-crude-rail-shipments-returnto-april-highs, Oct. 30, 2013.]* Crude-by-rail volumes experienced another dip around April of 2014, but once more volumes climbed. *[Footnote: See Association of American Railroads, "AAR Reports 2014 First Quarter Crude Oil Carloads, Increased Traffic for May and for the week," June 5, 2014, https://www.aar.org/newsandevents/Press-Releases/Pages/2014-06-05-railtraffic.aspx.]* Since January 2015, crude-by-rail from Bakken has seen a decrease, however experts do not expect this trend to continue and total levels remain high. *[Footnote: See Brian Nearing, "Oil train decline in Albany not permanent, energy consultant says," TIMES UNION (October 16, 2015), available at http://www.timesunion.com/business/article/Oil-train-decline-in-Albany-not-permanent-energy-6573033.php; Exh. 18 North Dakota Pipeline Authority, Monthly Update – August 2015, available at https://ndpipelines.files.wordpress.com/2012/04/ndpa-monthly-update-october-13-2015.pdf.]*

[Figure 1: Railroads Moving More Crude Oil; reviewed but not reproduced.] *[Footnote: Association of American Railroads, Railroads Moving More Crude Oil, https://www.aar.org/Pages/Crude-Oil-Rail-Traffic.aspx.]*

Unit trains are long freight trains composed of at least fifty and sometimes 100 or more cars used to transport single bulk products between two points. Unit trains are unloaded on arrival and returned for another load. Unit trains cut costs (and save time) by eliminating the need for intermediate yarding and switching between origin and destination. These cost savings, combined with the boom in mid-continent production of crude oil have driven a corresponding boom in the construction of rail terminals designed to handle unit trains. According to one industry analysis:

> The number of rail terminals in producing regions loading crude oil onto rail tank cars has increased from a handful at the end of 2011 to 88 and growing today. A further 66 crude oil unloading terminals have been built or are under construction. *[Footnote: Fielden, Sandy, RBN Energy, "Crude Loves Rock'n Rail," http://www.rbnenergy.com/154-terminals-operating-bnsf-the-dominant-railroad, May 12, 2013; see also U.S. Energy Information Administration, "Crude by rail accounts for more than half of East Coast refinery supply in February" (May 5, 2015), available at http://www.eia.gov/todayinenergy/detail.cfm?id=21092; U.S. Energy Information Administration, "Crude-by-rail transportation provides Bakken Shale production access to major markets" (June 10, 2015), available at http://www.eia.gov/todayinenergy/detail.cfm?id=16631.]*

Response T8-46

Comment acknowledged.

Comment T8-47

Predictably, the rise in crude transportation by rail has resulted in soaring numbers of crude oil releases to the environment in the form of both accidents and "non-accident" releases such as leaks. The growing number of reported "incidents" involving crude oil transportation by rail are listed in Table 1. From 1975 to 2012, federal records show, railroads spilled 800,000 gallons of crude oil. *[Footnote: Clifford Krauss and Jad Mouawad, "Accidents Surge as Oil Industry Takes the Train," THE NEW YORK TIMES (Jan. 25, 2015), available at http://www.nytimes.com/2014/01/26/business/energy-environment/accidents-surge-as-oil-industry-takes-the-train.html?_r=0.]* An approximate total of 1.5 million gallons of crude oil was released during only 2009-2015, the result from the 426 incidents that have been reported to the Pipeline and Hazardous Materials Safety Administration ("PHMSA"). *[Footnote: Data derived from PHMSA incident reports, http://www.phmsa.dot.gov/hazmat/library/datastats/incidents.* This data is largely self reported by the railroads and likely underestimates the numbers and magnitude of incidents.] PHMSA records nearly $47 million in damages resulting from these incidents. *[Footnote: Id.]* These incidents do not include the incidents that have occurred across the border in Canada, such as the catastrophic Lac-Mégantic derailment.

Table 1 ***[Footnote: Id.]***

Year	Crude-by-Rail Incidents
2009	1
2010	9
2011	34
2012	88
2013	119
2014	144

2015 (January-June)	31
TOTAL	**426**

Because Bakken crude is unusually flammable, the consequences of spills are particularly severe. On July 6, 2013, in Lac-Megantic, Canada, a train carrying Bakken crude oil derailed and exploded, killing forty-seven people and destroying fifteen acres in the center of the town. *[Footnote: Transportation Safety Board of Canada, "Railway Investigation R13D0054," http://www.bsttsb.gc.ca/eng/enquetes-investigations/rail/2013/R13D0054/R13D0054.asp#sal, Sept. 11, 2013.]* On October 19, 2013, in Edmonton, Canada, a fireball erupted as a Bakken train derailed, burning several homes to the ground. On November 8, 2013, twenty cars of a Bakken unit train derailed in Alabama, burning and sending a fireball 300 feet into the air, also polluting wetlands and a river. On December 30, 2013, a mushroom-shaped fireball erupted in Casselton, North Dakota, followed by heavy plumes of toxic smoke, when twenty-one cars of a Bakken unit train derailed and burned. The town was evacuated, and evacuation was urged for everyone in a five-mile radius. On January 7, 2014, in Plaster Rock, New Brunswick, Canada, 150 people were evacuated from their homes when seventeen cars derailed. On January 20, 2014 in Philadelphia, Pennsylvania, seven cars of a 10l-car train from Chicago derailed on a bridge over the Schuylkill River. Six of the derailed cars were carrying Bakken crude. On February 13, 2014, a 120-car train carrying Canadian crude derailed in western Pennsylvania, spilling oil and smashing into an industrial building. On April 30, 2014, a train carrying crude oil derailed and burst into flames in downtown Lynchburg, Virginia, with some 300 people in the area evacuated, huge flames and black plumes of smoke shooting high into the sky, and reports of several tank cars spilling oil into the nearby James River.

The list of accidents to date in 2015 is startling. Between February 14 and 16, three major crude-by-rail accidents occurred in Canada and the United States, with the last derailment culminating in an enormous fireball that forced the evacuation of a West Virginia town and threatened local drinking water. On March 5, a BNSF oil train with 103 tank cars carrying explosive Bakken crude oil from North Dakota derailed just south of Galena, Illinois. Twenty-one cars derailed and a black-plumed fire continued to burn a day later. On March 7, a Canadian National Railway train carrying Alberta crude oil derailed outside of the tiny town of Gogama in northern Ontario, and five of the thirty-eight cars that came off the tracks fell into the Mattagami River. The accident caused a massive fire and leaked oil into waterways that are used by locals, including a nearby indigenous community, for fishing and drinking. The overall increase in crude-by-rail derailments and spills has resulted in an increase in public awareness and reporting on the issue. *[Footnote: See Ralph Vartabedian, "Why are so many oil trains crashing? Track problems may be to blame," LA TIMES, October 7, 2015, available at http://www.latimes.com/nation/la-na-crudetrain-safety-20151007-story.html; Clifford Krauss and Jad Mouawad, "Accidents Surge as Oil Industry Takes the Train," THE NEW YORK TIMES, January 25, 2015, available at http://www.nytimes.com/2014/01/26/business/energy-environment/accidents-surge-as-oilindustry-takes-the-train.html?_r=0; Ralph Vartabedian, "Crude-oil train wrecks raise questions about safety claims," LA TIMES, March 12, 2015, available at http://www.latimes.com/nation/lana-oil-train-explosions-20150313-story.html; Shane Ferro, "US oil train accidents won't go away any time soon," BUSINESS INSIDER, March 20, 2015, available at http://www.businessinsider.com/crude-oil-train-derailments-2015-3.]*

Response T8-47

Comment acknowledged.

Comment T8-48

Western Washington has not avoided accidents. In June of 2014, an oil train heading to the Tesoro refinery derailed under the Magnolia Bridge in central Seattle. *[Footnote: See http://www.komonews.com/news/local/Oil-train-derails-under-Seattles-Magnolia-Bridge-268442612.html.]* While no oil spilled in that event, given the location of the derailment it would have been a catastrophe if a fire had resulted. Similarly, a train carrying Bakken crude to the BP refinery derailed in Montana, resulting in a significant oil spill but not a fire. *[Footnote: See http://fuelfix.com/blog/2015/07/20/officials-oil-train-didnt-speed-before-montana-derailment/.]* Additional accidents involving trains carrying crude oil to Western Washington are only a matter of time. *[Footnote: Leaks from oil trains have already drawn fines; in March 2105, Washington state regulators recommended BNSF be fined up to $700,000 for failing to properly report more than a dozen hazardous materials spills in recent months despite prior reminders. See http://www.bellinghamherald.com/news/local/article22282506.html.]*

Additional information regarding the costs of these accidents is provided in Exhibit 19, "Analysis of the Potential Costs of Accidents/Spills Related to Crude by Rail." *[Footnote: Exh. 19. This analysis was prepared by The Goodman Group, Ltd, a consulting firm specializing in energy and regulatory economics, on behalf of Oil Change International.]* This analysis demonstrates that the costs of crude-by-rail incidents are often enormous, and that a major unit train incident could cost $1 billion or more for a single event. As explained in Exhibit 19, the Lac-Megantic rail disaster will likely have costs on the order of $500 million to $1 billion, excluding any civil or criminal damages. Damages for a similar incident could have been substantially higher had it occurred in a more populated area. Lac-Megantic is also relevant in that it shows the devastating consequences of an accident involving highly flammable light crude (such as the Bakken crude) in a small town, both in terms of loss of human life and widespread explosion and fire damage to surrounding property.

Exhibit 19 also analyzes the spill of tar sands dilbit from Enbridge's Line 6B in Marshall, Michigan. This rupture in 2010 had costs of approximately $1 billion for Enbridge. The spill volumes at Marshall (840,000 gallons) were within the range of the amount of spill possible (and, in fact, substantially less than the maximum spill) if a crude by rail unit train released much of its cargo. Once again, damages for similar incidents could have also been substantially higher had they occurred in a more populated area. Marshall is also relevant in showing the high potential cost of dilbit spills into water (and rail lines are often highly proximate to water).

Response T8-48

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms.

Comment T8-49

Unfortunately, the pattern of oil train accidents and explosions is unlikely to end soon. On May 8, 2015, the U.S. Department of Transportation published long-awaited new standards for oil tank cars and oil train safety. *[Footnote: PHMSA/DOT, Hazardous Materials: Enhanced Tank Car Standards and*

Operational Controls for High-Hazard Flammable Trains, 80 Fed. Reg. 26644 (May 8, 2015).] These rules, too long in coming, are woefully inadequate. While the new rules establish stronger standards for newly built tank cars, they set weaker standards for retrofitting existing tank cars, and DOT is allowing these hazardous tank cars to continue shipping explosive crude for almost a decade, with even the most dangerous tank cars remaining in service until 2018. *[Footnote: Earthjustice, Analysis of 7 Hidden Dangers in the New Federal Oil Tank Car Rule, available at http://earthjustice.org/sites/default/files/files/7%20Things%20CBR%20Rule%205%2013.pdf; see also Tate, Curtis, Speed rules didn't apply to train in ethanol spill, http://www.mcclatchydc.com/news/nation-world/national/economy/article45226446.html (noting new federal rules don't apply to all trains carrying crude oil).]*

The rules have been challenged in federal circuit court both by some of the Commenting Organizations, as well as industry groups seeking even weaker challenges. See American Petroleum Industry v. United States, Nos. 15-1131, 15-1132, 15-1182, 15-1194, 15-1195, 15-1199 (consolidated) (D.C. Cir.). That case will take at least a year to resolve. And relatedly, a recent report highlighted dangers of oil trains crossing over old and unsafe rail bridges. See Exh. 20, Waterkeeper Alliance, Riverkeeper, and ForestEthics, Deadly Crossing, Neglected Bridges & Exploding Oil Trains (Nov. 2015).

Response T8-49

To address potential safety gaps associated with phased requirements of with the referenced ruling, the applicant has voluntarily committed to the following measure to help reduce risks associated with crude oil transportation by rail.

- To reduce potential risk from tank car punctures and spills identified with use of DOT-111 tank cars for transport of Bakken crude oil, the applicant will not accept crude oil by rail unless the following actions occur.
    - The rail cars meet or exceed the new U.S. Department of Transportation specification 117 design or performance criteria.
    - Existing tank cars are retrofitted in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 FR 26643).

Comment T8-50

9.1 FLAWS IN ANALYSIS OF INCREASED RAIL TRAFFIC AND IMPACTS.

As presented in the expert report of Dr. Fred Millar, attached as Exh. 2, the DEISs contain a variety of errors and flaws that undermine their conclusions. In sum,

- The DEISs fail to adequately consider potential major crude-by-rail derailment hazard events by (1) omitting analysis of shipper or carrier worst case scenarios, (2) failing to use available models to estimate potential consequences, and (3) failing to summarize recent federal reports of ranges of expected crude-by-rail accident consequences.
- The DEISs make only a brief and pro forma acknowledgement of significant risks from crude-by-rail oil spills and fire/explosion events. The DEISs lack any substantive discussion or focus on the consequences to human health and safety of potentially serious crude-by-rail releases, either on the PS&P line or in the extended BNSF rail haul.

Response T8-50

As discussed in the Master Response for Environmental Health and Safety Analysis, the analysis of potential environmental health and safety impacts looks at the relative risks for a set of release scenarios that could occur as the result of terminal operations and rail and vessel transport associated with the proposed action. Appendix M, *Risk Assessment Technical Report,* does not predict precise spill sizes or locations where spills might occur. This approach provides decision-makers and planners with a range of potential outcomes related to the proposed action to help them understand potential risks and propose targeted mitigation measures. By extension, the Draft EIS does not predict the specific consequences that would affect individual resource areas or populations along rail and vessel transportation corridors with any single release scenario. Rather, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident occurs.

All the release scenarios considered in the risk assessment were developed in accordance with applicable regulatory requirements and based on project-specific information. To that end, worst-case release volumes were considered consistent with WAC 173-182-030 and WAC 480-62-300 as discussed in the Master Response for Environmental Health and Safety Analysis.

Additionally, some risks related to the proposed action would remain even with the implementation of the proposed mitigation measures. As noted in Chapter 4, Sections 4.4.4, 4.5.4, and 4.6.4, no mitigation measures would completely eliminate the possibility of a large spill, fire, or explosion, nor would they completely eliminate the adverse consequences of a large spill, fire, or explosion. Refer to the Master Response for Geographic Scope of the EIS for additional information about the analysis of impacts associated with rail transportation along the PS&P railroad and beyond.

Draft EIS Chapter 4, *Environmental Health and Safety*, acknowledges that the analysis presented in Draft EIS Appendix M, and summarized in Section 4.5, *Environmental Health Risks—Rail Transport,* relied on 2014 Federal Railroad Administration data to determine the appropriate accident rates for rail-related incidents. Refer to the Master Response for Risk Assessment Methods for additional information about the specific methods, data sources, and assumptions used in the analysis of risks.

Comment T8-51

- The DEISs significantly underestimate the likelihood of significant human health and safety impacts from crude-by-rail derailments.

Response T8-51

The risk assessment evaluates the likelihood of different spill scenarios occurring rather than predicting specific outcomes that may occur as the result of the proposed action. By extension, the Draft EIS does not predict the specific consequences that would affect individual resource areas or populations along rail and vessel transportation corridors with any single release scenario. Rather, Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident occurs, including the types of impacts that could affect human health. Final EIS Section 4.7 has been revised to more fully describe the potential human health impacts that could occur as the result of an oil spill, fire, or explosion.

Comment T8-52

- The DEISs fail to consider local route and infrastructure conditions.

Response T8-52

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant. Additionally, as described in the Master Response for Environmental Health and Safety Analysis, the impact analysis presented in the Draft EIS focuses on the risks of a set of spill scenarios rather than predicting where a specific incident of a certain type may be more likely.

Comment T8-53

- The DEISs rely on data and models likely to be biased and uses non-relevant data.
- The DEISs improperly default to reliance on existing and future rail safety regulations, without acknowledging current baseline conditions or regulatory gaps and deficiencies.

Response T8-53

As noted in the Master Response for Baseline and No-Action Alternative, the Draft EIS considers the potential for reasonably foreseeable changes that would occur unrelated to the proposed action, including planned infrastructure improvements on the PS&P rail line and regulatory requirements for improved rail tank car design. The specific assumptions relevant to the rail traffic and safety analyses are described in Draft EIS Section 3.15, *Rail Traffic*, and Appendix M, *Risk Assessment Technical Report*. For additional information about how the EIS approached the analysis of emergency preparedness planning and response capabilities, refer the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment T8-54

- The proposed mitigation measures are inadequate. [Footnote: These comments are explained in detail in the attached report of Dr. Fred Millar (Exh. 2). Additional comments with respect to the hazardous rail transportation of crude oil are found in Exh. 21, Millar Comments on DEIR for Valero Benecia CBR Project; Exh. 22, California Attorney General comments on Valero Benecia DEIR; and Exh. 23, Testimony of Fred Millar, filed in RE Sources for Sustainable Communities v. Equilon Enterprises, PL14-0396 (Skagit County Hearing Examiner).]

Response T8-54

Responses to Exhibit 2 are provided in the Responses to Comments T8-165 through T8-214. Exhibits 21, 22, and 23 were received; however, because the comments do not specifically state how comments made on the other projects and cases are applicable to this Draft EIS, individual responses to those exhibits are not provided.

Comment T8-55

Additionally, Table 5 in Appendix M presents numbers as "probabilities" with no explanation. No formula is provided to explain how these numbers were calculated even though rail release events could be described as probability per rail mile or probability per time. The last paragraph in that section (at page 4-6) compares the national average accident rate (2.475 / million miles [Table 6]) to the PS&P rate (22.325 / million miles [Table 6]) and notes that the PS&P rate was approximately ten times the national rate. The DEISs then halve the PS&P rate based on unspecified "improvements." A correct analysis would be to use the observed 22.325 rate since the effect of "improvement" is speculative, analysis should provide a table of values based on the observed rate and a range of speculated rates, and because of that failure the expected accident rate may actually be twice as high as that calculated and discussed in the DEISs and in Table 7 of Appendix M.

Likewise, the first paragraph of section 4.3 describes Table 7 as "frequency of accidents." The "frequency of accidents" may equal number of miles times accident rate, but there is no formula, explanation, or data reference in the text of section 4.3 or in the Table 7 heading. Each Table should be labeled with formulas and data reference and a clear explanation of what the numbers mean. Table 8 presents additive probabilities for all 3 sensitive areas but the sum is incorrect (5% + 3% + 10% = 18%; Table 8 sums as 17%); the length of miles is also summed incorrectly (3 + 2 + 6 = 11; Table 8 sums as 10). If these are rounding errors, Table 8 should include at least 1 significant digit so the summation is clear.

In addition, Table 7 in Appendix M and accompanying text do not present the additive probabilities and expected oil spill frequencies (the probability of expected frequency of a small, medium, or large release from any source). The DEIS must include a consideration of the additive probabilities of a release anywhere since the specific type of spill is less important to consider than how frequently a spill of any size can be expected.

Response T8-55

The probabilities in Draft Appendix M, *Risk Assessment Technical Report,* Table 5: *Representative Probabilities of Different Release Sizes during Rail Transport* are the distribution of conditional release probabilities given an accident on the PS&P line, based on the rail cars expected in 2017 and 2037, as per the footnotes. They are not release frequencies.

Appendix M, Table 8 lists four sensitive habitats along the route and shows the length of route near them. The fourth row is not a sum.

The values in Appendix M, Table 7 and the other tables showing a range of release sizes can simply be added to get the overall chance of a release. However, it is important not to assume that the overall frequency is for a large release, which is why the range of frequencies and associated spill sizes are given.

The noted improvements include both those taken by PS&P after the spate of accidents in 2014 and the planned upgrades to Track Class 2. These planned improvements are described in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*.

For additional information about why risks of different scenarios are not combined, refer to the Master Response for the Risk Assessment Methods.

Comment T8-56

Rail Table 16 also fails to provide an accurate picture of the probability of an accident. The probability of accident I mile in this table are useful for comparison but additive probabilities are absent (the probability of accident I mile in from any size). In addition, the parameter "releases / mile" is not intuitive because the result is extremely small. Because the relevant concern is probability of release the "release / mile" should be multiplied by the number of miles the trains will be traveling. In Table 16_revised the probabilities are multiplied by 100 miles to show the increased likelihood of a spill of any size on any 100 mile stretch. The final row shows the probabilities become noticeably larger and present the true risk in a transparent way.

Response T8-56

The release per mile data in Draft EIS Appendix M, Table 16, were provided so that potential risks associated with a particular segment of interest could be calculated. As noted in the comment, by expanding the length of the segment in question, the risks increase.

Comment T8-57

It is not clear from the DEISs why Westway estimates substantially fewer train trips per oil received than Imperium. Westway estimates 458 yearly unit train trips to transport a throughput of 806.4 million gallons of oil. Westway DEIS at 1-1, 2-9. That means each of Westway's arriving trains would carry 880,349 gallons of oil [806.4 million gallons / (458 train trips / 2)]. Imperium, on the other hand, estimates 730 yearly unit train trips to transport a throughput of 1.26 billion gallons of oil. Imperium DEIS at 1-1, 2-13. That means each of Imperium's arriving trains would carry 863,014 gallons of oil [1.26 billion gallons / (730 train trips / 2)]. This discrepancy of nearly 20,000 gallons per train trip estimate must be explained.

Table 16_revised. Predicted Rail Transport Releases on Per 100 Mile Per Year Basis—Proposed Actions and Cumulative Projects

			Predicted Increase in Releases/Mile					
			Westway 2017	2037	Imperium 2017	2037	Cumula-tive 2017	2037
Event	# Cars		Probability per 100 miles					
Minor collision / derailment		1000 gallons (24 barrels spill	0.01700	0.01600	0.02700	0.02600	0.05800	0.05400
Collision / derailment with release	1	30,000 gallons (714 barrels)	0.04700	0.03900	0.07500	0.06200	0.1600	0.13000
Collision/ derailment with release	3	90,000 gallons (2,143 barrels)	0.00690	0.00460	0.01100	0.00730	0.02300	0.01500
Collision / derailment with release	5	150,000 gallons (3,571 barrels)	0.00035	0.0001	0.00056	0.00024	0.00120	0.00051
Collision / derailment with release	15-30	450,000 to 900,000 gallons (10,710 to 21,420 barrels)	0.00002	0.00001	0.00004	0.00002	0.00008	0.00004
Column probability totals			0.07127	0.05976	0.11350	0.09556	0.24228	0.19955

Response T8-57

Estimates of the number of rail and vessel trips for each applicant were based on the total estimated annual throughput for each proposed action. Additionally, the proposed action includes only the additional increase in throughput associated with the proposed action while the increase in throughput for the REG (formerly Imperium Terminal Services) project is based on the total increase in capacity in consideration of existing and proposed operations.

Comment T8-58

9.2 THE DEISs DETERMINE, EVEN WITH THE FLAWS DISCUSSED ABOVE, THAT THE PROJECTS' INCREASED RAIL TRAFFIC WOULD INCREASE THE RISK OF A DERAILMENT, SPILL, FIRE, OR EXPLOSION.

Even with these serious flaws, the DEISs find that the risk of an oil spill from rail cars cannot be fully mitigated, and if a spill occurred, the environmental damage would be significant. Westway DEIS at S-19 to -22. Additionally, the DEISs determine that the projects' increased rail traffic increases the risk of a derailment, spill, fire, or explosion. *Id*. at S-23. These risks cannot be fully mitigated and if a spill occurred, environmental damage would be significant. *Id.* at S-25. See also Westway DEIS at S-39, S-49, S-51, S-63 (on-site operations, increased rail traffic, and cumulative increased rail traffic increased potential for an incident involving a spill, fire, or explosion, a significant, adverse environmental impact that mitigation cannot address).

Response T8-58

Final EIS Chapter 4, Sections 4.4.4, 4.5.4, and 4.6.4, acknowledge that no mitigation measures would completely eliminate the possibility of a spill, fire, or explosion, nor would they completely eliminate the adverse consequences of a spill, fire, or explosion.

Comment T8-59

9.3 UNEXAMINED IMPACTS ON OTHER RAIL USERS

The Washington State Department of Transportation Freight Rail Plan 2010-2030, Exh. 40, indicates that a number of critical sections of track, including the Columbia Gorge, were at or near capacity in 2008 and predicted further congestion by 2028. Other key chokepoints are identified in the Plan, the Washington State Transportation Commission's Statewide Rail Capacity and System Needs Study, December 2006 (Exh. 25), and the *Heavy Traffic Ahead* study (Exh. 24). Additional critical bottlenecks include the Columbia Gorge and the Spokane-Sandpoint Corridor (known in railroad parlance as "the Funnel," due to the fact that most major east-west rail corridors converge there). This project would contribute to additional congestion, yet the DEISs fail to address traffic beyond the PS&P line.

The DEISs should fully analyze the impacts on northwest shippers if inbound and outbound freight traffic is diverted or eliminated due to the competition with crude oil trains. Unless mitigated with significant capacity additions, the addition of the increases of oil train traffic is likely to present significant adverse impacts on other users of the rail line, including grain and fruit shippers, intermodal users, ports, industries, aircraft manufacturers and passenger rail-all of whom are critically dependent on timely and affordable access to the rail system.

Oil-by-rail traffic is already displacing and harming other economic sectors. Rail costs are a significant factor affecting the lack of competitive status of Washington Ports as compared to others on the west coast due to the prioritization of higher freight rates paid by oil shippers. In March 2015, the Washington Department of Ecology released the *Marine and Rail Oil Transport Study-Preliminary Findings & Recommendations. [Footnote: Exh. 26*.] The report includes a section describing oil-by-rail traffic blocking or slowing other Freight train traffic. The report states:

The addition of crude by rail trains is causing concerns about slowdowns or temporary blockages of other freight trains carrying grains and other perishable food commodities. This is mainly due to a lack of locomotives, freight cars, and other factors, in addition to congestion on the rails. BNSF and UP have stated that the increase in crude by rail trains will not impact other freight train traffic, however, some stakeholders are concerned. Decisions on the use of locomotives and railroad lines are based on commercial market factors. The issue of train capacity affecting transportation of various commodities is not a new one. At some times of year, anhydrous ammonia shipments (for fertilizer used in spring planting) are given priority, for example.

Id. at 41. News outlets from the New York Times to Bloomberg News report on the significant toll of oil-by-rail traffic on other commodities and port business.

The DEISs fail to analyze impacts, mitigation measures, and potential funding relating to the use of passenger rail on these same lines. As Exh. 27 discusses, the Amtrak Cascades Mid-Range Plan (2008), Washington and passenger rail advocates have significant plans for increases of passenger rail capacity, including adding additional high-speed passenger trains on the 1-5 corridor. The DEISs must analyze how existing and expanded passenger rail uses will be impacted if freight traffic increases. *[Footnote: Passenger service that may be affected would include, among others, Sound Transit Sounder Commuter services as well as Amtrak intercity service and Empire Builder service between Seattle and Chicago. The Empire Builder service also utilizes "The Funnel" in Spokane, which is expected to see the greatest increase in freight rail traffic because of the coal shipments.]* The DEISs should also consider existing and prospective public funding for rail capacity to purchase passenger rail service. The public has spent billions of dollars in rail improvements to ensure that passenger rail fits with existing capacity, and it is imperative that the DEISs fully analyze the past and prospective investments to ensure that public funds are not spent for private purposes.

The DEISs must also account for the demand for public investment spurred by this project. Rail infrastructure improvements are anticipated, although it is far from clear how those improvements will be funded. Rail lines and infrastructure will also need to be regularly maintained, and there will be mitigation costs for structures such as overpasses, tunnels, and railroad crossings. The DEISs must also address whether the public will be expected to bear any costs for infrastructure constructed for private benefits. Federal and state governments commonly bear a significant share of the costs of freight rail capacity improvement projects. *[Footnote: See Sightline, January 2013, Who Pays for Freight Rail Upgrades? available at http://daily.sightline.org/2013/01/18/who-pays-for-freight-railway-upgrades/.]* The DEISs should include all needed capacity improvements that will be required to address at least those areas where the planned oil train traffic will exceed the capacity of the existing system.

Response T8-59

The potential for impacts in the extended study area is addressed qualitatively for the reasons discussed in the Master Response for the Geographic Scope. Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, acknowledges that routine operation of the proposed action could result in an

increase in impacts likely to be similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, discusses the capacity points raised by the commenter by presenting information from the Washington State Rail Plan[5] on future rail traffic and use of the main lines. As summarized in Final EIS Chapter 5, Section 5.5.1.1, *Planned Capacity Enhancements*, several rail segments are expected to require operational changes and/or capital improvements to manage anticipated freight rail volumes under the 2035 projection regardless of the proposed action. As noted, BNSF plans to accommodate growing demands for oil and freight transit with capital investments in infrastructure and equipment enhancements. In 2014, BNSF identified almost $500 million of proposed infrastructure improvements on the northern tier of its network—primarily in North Dakota, Montana and Washington—to address capacity needs for handling more crude oil and agricultural products traffic. In 2016, BNSF identified $220 million for capital improvements in Washington.[6] Any potential use of passenger rail on the same lines would further add to any existing or future capacity concerns, already disclosed in the Draft EIS.

Comment T8-60

9.4 INCREASED RAIL TRAFFIC AT CROSSINGS MEANS DELAYS AND HARM TO EMERGENCY RESPONSE.

The increased rail traffic associated with these proposals threatens to delay and frustrate area drivers, as well as cause real harm to emergency services and responses. As explained by Public Health expert Dr. Frank James (Exh. 7), frequent long trains at rail crossings will mean delayed emergency medical service response times, as well as increased risk of accidents, traumatic injury, and death.

The Washington Department of Transportation, in its May 22, 2014 scoping comments "identified 25 state highway intersections and one limited access interchange . . . where operations may be adversely impacted due to delays at nearby highway-railroad grade crossings." In Skagit County, where oil trains are already traversing the county en route to three oil refineries, a draft study is in progress to analyze impacts of trains at crossings. See http://www.goskagit.com/skagit/study-examining-impact-of-more-trains-at-skagit-county-railway/article_95be7d57-d4b9-5472-b 190-5189c02fdc3c.html ("'Trains already cause traffic delays that add up to about an hour every day at intersections in Mount Vernon and Burlington. . . . Vehicle backups at rail crossings can do more than frustrate drivers. Ambulances, fire trucks and police cars on their way to emergencies also have to wait.").

The DEISs find significant, adverse impacts due to traffic delays, including harm to emergency service from those traffic delays. Westway DEIS at S-45 ("Increased rail traffic related to the proposed action could result in substantial increases in vehicle delay at the Olympic Gateway Plaza and between Poynor Yard and the project site compared to the no-action alternative."); *id*.

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[5] Washington State Department of Transportation. 2014. *Washington State Rail Plan: Integrated Freight and Passenger Rail Plan 2013-2035*. Available: http://www.wsdot.wa.gov/NR/rdonlyres/F67D73E5-2F2D-40F2-9795-736131D98106/0/StateRailPlanFinal201403.pdf. Accessed: December 1, 2014.

[6] BNSF Railway Company. 2016. *BNSF Railway plans nearly $220 million capital investment program in Washington state for 2016.* February 16. Seattle, WA. Available: http://www.bnsfmedia.com/go/doc/7090/2787081/BNSF-Railway-plans-nearly-220-million-capital-investment-program-in-Washington-state-for-2016

("Increased rail traffic related to the proposed action could block vehicular access, including emergency service assess, to the Olympic Gateway Plaza and between Poynor Yard and the project site for a substantial period compared to the no-action alternative."). Ecology and Hoquiam should use these findings to deny the requested permits.

Response T8-60

Comment acknowledged.

Comment T8-61

9.5 EMERGENCY SERVICES AND PREPAREDNESS

When a crude oil spill from a rail car occurs, local response assets are generally the first ones on scene. These assets will include those provided by police departments, fire fighters, and emergency managers. Many times however, these response individuals are unaware of the nature of, and the threat posed by, the materials that are being transported through their communities.

SEPA requires consideration of emergencies and accidents, and does not allow their impacts to be ignored simply because they are uncertain to occur in any specific time frame. WAC 197-11-794 ("An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred."). SEPA's significance regulation explicitly calls for consideration of "unique and unknown risks" of projects, and the extent to which they "may affect public health or safety." WAC 197-11-330; *accord San Luis Obispo Mothers for Peace v. Nuclear Regulatory Comm'n*, 449 F.3d 1016, 1031 (9th Cir. 2006) (agency needs to consider threat of terrorist attack in NEPA process).

Here, the DEIS fails to adequately disclose the state of preparedness both on the PS&P line and the mainline across the state. Additionally, the DEIS fails to analyze detailed oil spill response plans to cover all scenarios on and offsite, including ''worst case" spills. Without this analysis, the public and decision-makers are unable to understand the potential risks and costs of this project or make an informed choice about whether the project should proceed.

As an example of the type of report that has focused on Bakken crude oil spills and emergency response, Exhibit 28 was prepared by the Massachusetts Department of Environmental Planning to provide a reference for first responders and emergency planners as the local, state, and federal level, including entities in the private sector. *[Footnote: Exh. 28, Bakken Crude Oil Spills—Response Options and Environmental Impacts, Massachusetts Dep't of Environmental Planning (June 2015).]* The Massachusetts report stresses that "catastrophic accidents and large-scale releases remain a cause for concern," and "it is imperative that first responders receive information and training to properly respond." Id. at E-1.

The DEISs find significant, adverse impacts that cannot be mitigated due to "an incident involving the spill of crude oil ... that would exceed the capacity of the local emergency service response services." Westway DEIS at S-53. Ecology and Hoquiam should not accept this threat to public health and safety.

Response T8-61

Draft EIS Chapter 4, Section 4.2.1, *What framework prevents incidents from happening?* describes the formalized planning framework in place to address risks related to oil spills, fires, or explosions

from the terminal operations, rail transport, or vessel transport. The responsible party may vary during the transport of crude oil. This section describes the requirements for planning and preventive equipment and design. Chapter 4, Section 4.2.2, *What framework prepares for an incident?* describes the formalized planning framework in place to address risks related to oil spills, fires, and explosions.

Final EIS Section 4.2.2 has been revised to indicate that railroad operators would be required to develop spill contingency plans consistent with state requirements and a mitigation measure is proposed for a contingency plan to be submitted to Ecology until state requirements are in place. Final EIS Section 4.2.3, *What framework provides responses to an incident?* has also been updated to better reflect existing response capabilities and resources in the study area. Final EIS Section 4.7, *Impacts on Resources,* has been updated to better reflect how the proposed action could affect emergency service responses.

Final EIS Chapter 4 reflects additional mitigation measures proposed to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional fire-fighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

Chapter 4, *Environmental Health and Safety*, identifies other proposed measures to ensure that broader prevention, preparedness, and response planning involves the appropriate stakeholders and that updates to any plans applicable to reducing risks related to the proposed action contain appropriate applicant information and participation. To the extent possible, as outlined in the Master Response for Mitigation Framework, measures addressing the need for more coordinated and focused planning include the role of the applicants as appropriate.

Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7 describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about how the EIS approaches the analysis of emergency planning and response capabilities for additional information.

For more information about the analysis of potential impacts on the BNSF main line, refer to the Master Response for the Geographic Scope of the EIS.

Comment T8-62

10.1 GRAYS HARBOR MARINE IMPACTS

The DEISs' evaluation of the increased risk of conflicts with existing vessel and barge traffic in Grays Harbor, including the increased risk of catastrophic accidents, is one of the most important aspects of the environmental review.

There has been no comprehensive vessel traffic risk analysis done for Grays Harbor, although one has been repeatedly called for *[Footnote: Exh, 26, Marine and Rail Oil Transportation Study (March 2015) at 21, available at https://fortress.wa.gov/ecy/publications/documents/1508010.pdf.]*, and the analysis in the DEISs do not come close to being such a comprehensive traffic analysis.

Response T8-62

Comment acknowledged.

Comment T8-63

10.2 THE DEIS ANALYSIS OF OIL SPILL RISK AND RESPONSE IS SIGNIFICANTLY FLAWED.

Attached as Exhibit 1 is a technical review of the oil spill risk and response preparedness sections of the DEISs, prepared by Nuka Research and Planning Group. The summary of DEISs' flaws are reproduced below; the flaws, errors, and omissions identified in this report undermine all DEIS findings about significance of impacts and the real risks to people and the environment that these projects present.

- The DEIS documents present both qualitative and quantitative analyses of risk. The qualitative scales characterize oil spill likelihood and impacts on a continuum from "unlikely" to "likely." When the qualitative scales are compared to quantitative data, they appear to misrepresent the results.
    - For example, the qualitative scales represent the likelihood of a 105,000 gallon marine vessel oil spill from the no action alternative as roughly equal to the likelihood of a 1.2 million gallon spill from the Westway expansion. In fact, the likelihood is 2.5 times higher for the 1.2 million gallon spill at Westway. Similar discrepancies exist for the Imperium risk analyses.
    - In the rail car risk assessments, the qualitative sliding scales show only slight differences between risks from the no action to the proposed actions, even though the current risk of a crude oil rail car spill is zero.
    - The DEISs do not distinguish between the broad range of petroleum products that would be transported. The DEISs identify the following products that could be moved via vessel or rail in the proposed projects: Bakken crude oil, bitumen, ethanol, naptha, gasoline, vacuum gas oil, jet fuel, No. 2 fuel oil, No. 6 fuels oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat. The potential consequences of spills from this wide range of products would vary significantly, as would the ability to contain and recover the different types of product.
    - The DEISs characterize the risk of major marine vessel oil spills reaching water as highly "likely" but not absolutely certain. It is implausible that a 1.2 million gallon oil spill from a vessel that hits a dock or jetty would not result in oil reaching water, yet the qualitative scale appears to show that there is some chance that the 1.2 million gallons would not impact the water.
    - The DEISs lack sufficient information about the methods used to evaluate potential environmental impacts from the three large marine vessel oil spills described. The qualitative risk evaluation does not distinguish between potential environmental impacts based on spill size, location, or volume spilled. The Risk Assessment Technical Report does not present a consequence analysis, despite the fact that the Modeling Report (Appendix N) shows that for a 15.1 million gallon marine vessel spill, up to 11.2 million gallons is estimated to reach the shoreline within 24 hours. This is an Exxon Valdez-sized spill volume that would impact the Grays Harbor coastline. The potential consequences of such a catastrophic event are not considered.

- The manner in which oil spill frequency estimates and return rates are presented in the DEISs obscures the basic fact that these projects, if approved, would significantly increase the oil spill risk in Grays Harbor. The quantitative analysis presented in the DEISs estimates that the frequency of large spills from the Westway expansion would increase by 8-fold and at Imperium, spill frequency would increase to 30 times the no-action level. Oil spill frequency would be close to 40 times current levels if both projects proceed, and even higher if the U.S. Development project also moves forward.
- The DEISs discuss and present the project risks in a very compartmentalized manner. Individual probabilities are calculated for spills from rail, terminal, or vessel operations for each project. Cumulative risks are described for specific scenarios for each phase of operations, but these probability estimates are never aggregated. Spill probabilities are also never considered from the perspective of the potentially impacted environment. Based on the information presented in the DEISs, the chance of any size oil spill impacting the marine environment from vessel or terminal operations is 0.44/year. The expected frequency of any type of oil spill (2,100 gallons or more) impacting the marine environment is one spill every 2.2 years. The DEISs do not present this information, and does not consider the potential consequences to the marine environment from one oil spill every 26 months.
- The DEISs for Westway and Imperium cite an identical set of mitigation measures for marine vessel operations, which were presumably developed in tandem with the vision that these mitigation measures would be jointly funded and implemented. It is unclear whether there would be a reduction to mitigation measures if one but not both projects proceed. If the proposed mitigation were reduced, there could be a corresponding increase in the probability or consequences of marine oil spills.
- A simple arithmetic approach is used to estimate potential impacts of rail car incidents to sensitive habitats based on the percentage of the rail corridor that is proximate to sensitive areas. This is not a valid consequence analysis method.
- The modeled oil spill scenarios use medium crude oil as a proxy for a range of project oils, including Bakken crude and diluted bitumen; in reality, the chemical and physical properties of these and other potentially transported oils vary widely. Modeled behavior of medium crude oil may not accurately describe how a diluted bitumen or Bakken crude spill would behave.
- The modeled oil scenario trajectory maps are not informative about the scale of potential impacts, and the trajectory models are not used to evaluate potential consequences of a major marine oil spill. A consequence analysis that considered the spill trajectories against local wildlife, human use, and environmental sensitivities would inform the overall project risks.
- The escort fleet proposed to support the expansions will likely be inadequate to support the cumulative increases in large commercial vessel traffic.
- A vessel management system is proposed as a mitigation measure with no corresponding discussion of how it would be operated or funded.
- The significant increase in potential spill frequencies described in the DEIS should warrant a critical examination of the capacity of oil spill response resources available to respond to a Grays Harbor area spill.

Additionally, section 5.3 in Appendix M assumes no interaction between vessels. The probability of vessel allisions or collisions are estimated independent but this is obviously untrue. If multiple vessels are in Grays Harbor at the same time (or clustered on the open ocean) the probability of collision or allision will increase. This obvious reality does not appear to have been considered. That section also does not employ any data indexing the relative safety of Grays Harbor. Pilots typically describe some ports as more or less difficult to navigate than others but information regarding relative port navigability is not included.

Response T8-63

Responses to each issue are provided in Response to Comments to Exhibit 1, which include responses T8-124 through T8-164.

Comment T8-64

10.2 THE DEISs GREATLY UNDERCOUNT POTENTIAL VESSEL TRAFFIC.

The estimated vessel trip numbers vastly understate the number of vessels these projects would generate. The Imperium DEIS states that it estimated the number of vessel trips based on barges "because it results in the highest number of trips, based on tank barges having smaller capacity than tankers." Imperium DEIS at 2-13 n.12; Westway DEIS at 2-10 n.8 ("The higher number of trips assumes all tank barges. Because tank barges have smaller capacity than the tankers, more trips would be required."). However, it is evident from the vessel trip estimate that the DEIS assumes the largest possible size of tank barges, those holding 6.3 million gallons each. *[Footnote: (1.26 billion gallons total throughput / 6.3 million gallons per trip) * 2 to include empty inbound trips = 400 vessel trips total.]* Imperium DEIS at 2-13; Westway DEIS at 2-10 (doing the same calculation for Westway results in 256 yearly trips, which is actually higher than the estimates in the DEIS). *[Footnote: As with train trip estimates, there is a similarly unexplained discrepancy between the Westway Imperium vessel transit estimates, where Westway estimates substantially fewer trips per oil received. Westway estimates 238 yearly vessel trips to transport a throughput of 806.4 million gallons of oil. Westway DEIS at 1-1, 2-10. That means each of Westway's departing vessels would carry an average of 1.69 million gallons of oil, i.e. 806.4 million gallons / (238 vessel trips / 2). Imperium, on the other hand, estimates 400 yearly vessel trips to transport a throughput of 1.26 billion gallons of oil. Imperium DEIS at 1-1, 2-13. That means each of Imperium's departing vessels would carry an average of 1.58 gallons of oil, i.e. 1.26 billion gallons / (400 train trips / 2). Westway and Imperium must explain why Westway estimates its vessels would carry substantially more than Imperium's, resulting in fewer vessel trips.]*

If the DEISs used smaller barges for their calculations, such as those listed in the DEISs that only hold 1.05 million gallons, the yearly number of vessel trips would balloon to 2400 total trips for Imperium alone. [Footnote: (1.26 billion gallons total throughput / 1.05 million gallons per trip) * 2 to include inbound empty trips = 2400 vessel trips total.] The same calculation for Westway results in 1536 yearly vessel trips for Westway. The combined total would be 3936 trips, a far higher estimate than the 638 contained in the DEISs and illustrating a substantial underestimate; a mix of tank barge sizes-some 6.3 million gallon capacity barges and some with a 1.05 million gallon capacity-would also yield a result higher than the DEISs' estimates.

Additionally, the risk assessment appendix purports to analyze a range of possible vessel types and trip numbers, but it is capped at 238 trips for Westway and 400 for Imperium, as in the body of the DEISs. Westway DEIS App'x Mat 5-1; Imperium DEIS App'x Mat 5-1. The DEISs must correct this discrepancy and, at the very least, explain the rationale behind using the largest tank barges for

estimating vessel trips. This is a crucial step because almost all impact assessments-from spill likelihood to fishing impacts-depends on accurate assessments of the number of vessels arriving and departing the facilities.

Response T8-64

Table 3.17-9 in Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, presents the typical vessels that could be used to transport crude oil from the project site, including tank barges and tankers, and shows how many vessels would be needed to transport the maximum annual throughput of crude oil based on vessel capacity. While any tank vessel could be used to transport crude oil from the project site and would likely be determined by the applicant's customer, those listed in Table 3.17-9 are considered most typical because channel depths would restrict larger vessels and smaller vessels would be less economical.

The Crowley 550-Class tank barge is the most likely tank vessel to call at the project site under current channel conditions (controlling depth of 27 feet MLLW), because it provides the largest capacity with the greatest flexibility for transit windows. It also results in the highest number of transits. The Crowley 650-Class tank barge would be likely for projected channel depths. Therefore, the EIS considered a range of vessel trips based on these two vessel types.

TAs presented in Section 3.17.5.2, *Proposed Action*, the Crowley 550-Class tank barge has a capacity of 6.3 million gallons (150,000 barrels) and would result in 238 trips at maximum throughput (751.8 million gallons or 17.9 million barrels). The Crowley 650-Class tank barge has a capacity of 7.8 million gallons (185,000 barrels) and would result in 192 trips at maximum throughput.

Final EIS Chapter 2, Section 2.1.3.2, *Proposed Operations*, reflects revisions to the description of the tank barge capacity range and proposed number of trips.

Comment T8-65

Moreover, the DEISs fail to address the impacts of associated vessels for these facilities, such as fuel bunkering in Grays Harbor and additional trips for escort tugs, both of which add to the traffic and transportation of petroleum products resulting from the oil terminals. Some of these vessels with shallower drafts may be able to operate beyond channel restrictions which could interfere with gill nets and crabbing in some areas.

Response T8-65

Final EIS Chapter 2, *Proposed Action and Alternatives*, clarifies that proposed operations would not include vessel bunkering (fueling) at the project site. The Harbor Safety Plan for Grays Harbor (Grays Harbor Safety Committee 2014)[7] currently states that no bunkering is done in Grays Harbor, including at docks or anchorages. Final EIS Chapter 4, Section 4.6, *Environmental Health Risk—Vessel*, and Chapter 5, *Extended Rail and Vessel Transport*, reflect additional information about federal and state regulations related to bunkering operations.

[7] Grays Harbor Safety Committee. 2014. *Harbor Safety Plan.* Available; http://www.portofgraysharbor.com/harbor-safety/downloads/archive/Harbor-Safety-Plan_Grays-Harbor.pdf.

The draft of tugs does not limit the tugs to the navigation channel. Therefore, the additional number of trips required by tugs as part of the proposed action was not considered in the channel capacity analysis.

Comment T8-66

10.3 EVEN WITH THESE SERIOUS FLAWS, THE DEISs FIND SIGNIFICANT, ADVERSE ENVIRONMENTAL IMPACTS THAT CANNOT BE MITIGATED.

Even with the above significant errors and omissions, the DEISs find significant adverse impacts from increased marine oil transportation that cannot be mitigated. Westway DEIS at S- 39 ("The risks of larger spills of crude oil from vessel loading could adversely affect sensitive plant and animal species."); *id*. at S-56 ("Increased vessel traffic related to the proposed action would increase the likelihood of an incident involving the spill of crude oil within Grays Harbor compared to the no-action alternative."); *id*. at S-58 ("Increased vessel traffic related to the proposed action would result in increased potential for environmental damage from an incident involving the spill of crude oil compared to the no-action alternative"); *id* at S-63 ("Under cumulative conditions, there could be an increase in the likelihood of incidents involving a spill, fire, or explosion of crude oil compared to the no-action alternative"). Ecology and Hoquiam should use these findings to deny the requested permits.

Response T8-66

Comment acknowledged.

Comment T8-67

11.0 TYPES OF CRUDE OIL

The DEISs fail to fully disclose the various risks and consequences associated with different types of crude oil. This could include either light, sweet crude from the Bakken formation, or the heavy, toxic tar sands bitumen produced in Alberta.

Assessments of crude oil properties indicate the serious pernicious toxic properties of crude oil when released into air, water, and soil and its potential effects on fish, the aquatic environment, and wildlife. Crude oil spills are more difficult to clean-up than refined oil products. Crude oil is heavier and thicker; it lasts longer in the environment, coating vegetation, debris, and wildlife. Crude oil can also get trapped in sediments, rocks, and other debris, which allows the oil to be remobilized into the environment days, weeks, and even decades after a spill incident such as occurred in the cold waters of Prince William Sound, Alaska. An EIS must review the environmental impacts of different types of crude oil that may be shipped by Westway and Imperium and what cleanup problems they could create. Exh. 30, Jeffrey W. Short, Fate and Effect of Oil Spills from the Trans Mountain Expansion Project in Burrard Inlet and the Fraser River Estuary Prepared for Tsleil-Waututh Nation et al. at 10 (May 2015) ("Fate and Effect of Oil Spills") is an in-depth review of the current science on the effects of oil spills in marine and estuary environments. The DEISs should be amended to address this information.

Much of the public's attention has been focused on the unique risks posed by the highly flammable Bakken crudes, which have been the cause of the series of dramatic accidents across the nation in crude-by-rail derailments. However, a spill involving tar sands bitumen, while less likely to result in

fires and explosions, presents its own unique spectrum of risks. Diluted bitumen (including railtbit, synbit and dilsynbit) derived from Alberta tar sands crude is even more difficult to clean up once it is spilled in an aquatic environment, for after the lighter ends evaporate the heavier components can sink. Those risks have been documented by the U.S. Environmental Protection Agency after a pipeline spill in 2010 in Marshall, Michigan of Alberta tar sands crude:

> We have learned from the 2010 Enbridge spill of oil sands crude in Michigan that spills of diluted bitumen (dilbit) may require different response actions or equipment from response actions for conventional oil spills. These spills can also have different impacts than spills of conventional oil. We recommend that these differences be more fully addressed in the Final EIS, especially as they relate to the fate and transport of the oil and the remediation that will be required. . . . We recommend that the Final EIS more clearly acknowledge that in the event of a spill to water, it is possible that large portions of dilbit will sink and that submerged oil significantly changes spill response and impacts. *[Footnote: Exh. 29, EPA Letter of April 22, 2013 on Keystone XL DSEIS at 3-4.]*

These are the kinds of risks that need to be fully considered so that mitigation options can be considered. For example, if response capabilities are not adequate to deal with a bitumen spill, the County could consider prohibiting that source of crude for this project. Despite recent modifications to the contingency plans implemented by Ecology, responders are only required to improve their ability to detect sunken oils for there are no current technologies to recover sunken oil from depth. *[Footnote: Exhs. 45 and 46 are two comprehensive oil spill response studies for San Juan County, Washington, and British Columbia, Canada that illustrate the type of analysis missing in the DEISs.]*

The DEISs fail to address the types of crude oil shipped and their unique properties for health risks, spill clean-up, and climate impacts. The DEISs also fail to disclose the destination of the oil, be it to refineries in Washington and California or for international export.

Response T8-67

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods.

Comment T8-68

12.0 IMPACTS ON WATER QUALITY

The DEISs provide no quantitative analysis of the potential impacts to water quality, and resulting impacts to aquatic species.

Response T8-68

Draft EIS Chapter 3, Section, 3.3, *Water*, addresses water quality and surface waters; Section 3.3.5.2, describes potential impacts on these resources that would result from construction and routine operation of the proposed action. Quantitative information for specific water quality requirements would be addressed through the National Pollutant Discharge Elimination System (NPDES)

construction stormwater general permit and an NPDES industrial stormwater permit process. These permits address potential impacts on water quality for construction and operations. The Clean Water Act NPDES regulatory mechanisms and permits set limits on what can be discharged, prescribe monitoring and reporting, and set provisions to ensure that the discharge from a site does not adversely affect water quality. Potential impacts on aquatic species from construction and operation of the proposed action are discussed in Section 3.5, *Animals.* Potential impacts on aquatic species and aquatic habitat that would result from a large oil spill are described in several subsections of Chapter 4, *Environmental Health and Safety,* including Section 4.7.1.1, *Water,* 4.7.1.2, *Plants*, and 4.7.1.3, *Animals*.

Comment T8-69

12.1 SURFACE WATERS

Grays Harbor currently has several water quality issues for which it is listed as an impaired water under the Clean Water Act Section 303. Both the Chehalis and Grays Harbor have "inadequate controls" on point and nonpoint sources of pollutants. It has been shown in countless studies that aquatic organisms become increasingly vulnerable as they are subjected to multiple stressors in their environment. "Organisms living under conditions close to their environmental tolerance limits appeared to be more vulnerable to additional chemical stress" (Heugens, 2001). Aquatic ecosystems can change abruptly in response to accumulation and interaction of multiple stressors. Biodiversity has been shown to decrease in the face of multiple stressors as well (Vinebrooke, et. al., 2004). The DEISs do not seem to take into account that the aquatic organisms living in Grays Harbor and the Chehalis River may already be living at or around their tolerance limit, and additional stressors could push them over the edge making their habitat unlivable.

The DEISs fail to consider impacts to tribal resources from increased propeller wash. DEISs state,

> "Overall, any water quality impacts caused by propeller wash and vessel wake would likely be short term. Both Terminal 1 and the Cow Point Turning Basin are located in a portion of Grays Harbor that has a high existing baseline for turbidity (U.S. Federal Highway Administration and Washington Department of Transportation 2010:3.1-3-3). Consequently, vessel operations under the proposed action are not expected to increase turbidity levels substantially above existing conditions." Westway and Imperium DEISs at p. 3.4-17.

Existing turbidity does not mean that increases in turbidity from vessel traffic will not cause environmental damages. If anything, existing high turbidity could exacerbate future increases and cause damage to marine animals and plants. Damage to marine plants and animals would affect tribal fishing and gathering activities and impair the Quinault Indian Nation's federally-protected treaty rights.

The Westway DEIS does not address the issue that historical accumulation of dioxin has been found in the sediment surrounding the project site, and admittedly will be released/deposited into the water during construction. There is no analysis of the cumulative impacts from past and future releases from these project sites and the general area on aquatic ecosystems.

Until TMDLs are developed for identified pollutants, and TMDLS are implemented effectively, promises about heightened awareness and diligence of pollutants entering the water from this project are neither reliable nor adequate mitigation.

Response T8-69

The Draft EIS discusses species (aquatic or terrestrial) that are sensitive and vulnerable to stressors in the environment; these are species identified as special-status species in Chapter 3, Section 3.5, *Animals*, and include federal and state-listed candidate, threatened, endangered, proposed, species of concern, and sensitive species. The list of these species in the study area that could be affected by the proposed action is found in Appendix F, *Special-Status Species*. As stated in Section 3.5, special-status species are species that require special efforts to ensure their perpetuation because of their low numbers, sensitivity to habitat alteration, and tendency to form vulnerable aggregations.

Vessels related to the proposed action would be restricted to travel in the navigation channel. As stated in Section 3.3, *Water*, the area of the channel near Terminal 1 and the Cow Point Turning Basin already have high baseline turbidity levels; any resuspension of sediments from vessel movements or propeller wash in this area of existing high turbidity levels is likely to have little or no additional effect on the benthic communities living in these turbid environments.[8] Similarly, because temporary resuspension of sediments in the navigation channel occurs on a regular basis, it is unlikely that vessel traffic associated with the proposed action would cause any perceptible impacts on the benthic communities present, which are already adapted to living with the disturbance in the navigation channel. Therefore, related impacts on tribal resources from increased propeller wash are not likely.

Presence of dioxin is addressed in Section 3.3, which states that inner Grays Harbor is listed as a Category 4a water for dioxin, which means that there currently is a total maximum daily load (TMDL) in place to address dioxin water quality concerns and to keep the water body from attaining Category 5 status (or a 303(d) impaired water). Section 3.3 also identifies dioxin contamination of sediments in the study area immediately downstream of the outfalls of the pulp mills. The Washington State Department of Ecology states that no dioxins are allowed to be discharged into Grays Harbor and that the reduction of dioxin in the harbor and sediments are expected to slowly attenuate over time. In addition, the U.S. Army Corps of Engineers took sediment samples as part of their navigation channel dredging analysis and found that dioxin concentrations are below the current guidelines for Grays Harbor (Section 3.3). Further, the proposed action would require no in-water construction, so there is no potential for dioxin to be released from the sediment. TMDLs are only required for impaired 303(d) waters (Category 5) for the specific pollutant that is impairing the water. Inner Grays Harbor around the project site is not 303(d) impaired (Category 5) by any pollutant (Section 3.3). As stated above, the project site would require an NPDES construction stormwater general permit and an NPDES industrial stormwater permit for operations to address potential impacts on water quality. In addition, the permit would require the facility to develop a stormwater management and pollution prevention plan. The Clean Water Act NPDES regulatory mechanisms and permits set limits on what can be discharged, prescribe monitoring and reporting requirements, and set provisions to ensure that the discharge from a site does not adversely affect water quality.

[8] Washington State Department of Ecology. 2016. Water Quality Improvement Projects: Grays Harbor Area. Available: http://www.ecy.wa.gov/programs/wq/tmdl/ChehalisBasin/GraysHbrTMDL.html. Accessed: March 18, 2017.

Comment T8-70

12.2 WETLANDS

On a national scale, the highest and most biologically significant concentrations of contaminants in NOAA's National Status and Trends Program occur predominantly in urbanized estuaries (Kennish 1994). This is true in Grays Harbor. Estuaries are particularly sensitive ecosystems. The DEISs do not indicate whether BMPs will address the potential damage done to these fragile ecosystems that provide so many valuable functions to aquatic organisms.

Response T8-70

Assuming this comment refers to stormwater permit best management practices (BMPs), Draft EIS Chapter 3, Section 3.3, *Water*, discusses the potential impacts associated with smaller leaks and spills likely to occur during routine operations. As noted in the Draft EIS, BMPs required by applicable permits would minimize the potential for significant impacts during routine operations. The potential for impacts associated with the risks of spills, fires, and explosions are addressed in Final EIS Chapter 4, *Environmental Health and Safety*.

Comment T8-71

12.3 GROUNDWATER

The document identifies numerous groundwater resources within the Chehalis basin and acknowledges the potential for contamination should a spill occur. It does not analyze the potential effects on these groundwater resources should a spill occur.

Response T8-71

Draft EIS Chapter 4, Section 4.7.1.1, *Water*, *Groundwater,* addresses the potential impacts on groundwater from an oil spill. The potential for impacts associated with the risks of spills, fires, and explosions are addressed in Draft EIS Chapter 4, *Environmental Health and Safety*.

Comment T8-72

12.4 WATERFLOW

The DEISs do not address that the Chehalis Basin suffers from serious flood hazards (significant floods occurred in 2007 and 2009) that would jeopardize the rail transport of oil on the PS&P line. There is no analysis of the risk of such events on either the rail lines or the upland facilities and terminal docks proposed to be used for the storage and offloading of crude oil.

Response T8-72

Draft EIS Chapter 3, Section 3.1, *Earth*, and Section 3.3, *Water*, note that the proposed action would not result in any alterations to the topography that would adversely affect or alter floodplain function or capacity. In order for the proposed action to affect flood flows, the proposed action would need to alter the floodplain (e.g., fill placement or excavation in floodplain), which could alter flood flow. However, because no part of the proposed action would alter a floodplain, the proposed action would have no impact on flood flows. The project site is not in a mapped floodplain according to the Federal Emergency Management Agency's (FEMA) 2013 preliminary floodplain mapping

(Section 3.3.4.4, *Floodplains*). The PS&P rail line currently passes through or over FEMA mapped floodplains (Section 3.3.4.4, *Floodplains*); however, it is existing infrastructure.

Flooding is an environmental factor that can contribute to potential impacts from an oil spill incident (Chapter 4, Section 4.3.2, *What environmental factors contribute to potential impacts from an incident?*) Section 4.5.2.1, *Oil Spills,* addresses the movement of spilled oil in the Chehalis River during flood conditions; this information was incorporated into risk assessment in the analysis of the spill scenarios that could occur along the PS&P rail line. Refer to the Master Response for Risk Assessment Methods for additional information about the methods, data sources, and assumptions used in the analysis of risks.

Comment T8-73

13.0 IMPACTS ON PLANTS

The DEISs mention plant impacts from increased exposure to pollutants, but only discuss spills and leaks. Increased exposure to diesel particulates may also harm plant species *[Footnote: Bignal, K., et al. 2008. Effects of air pollution from road transport on growth and physiology of six transplanted bryophyte species. Environmental Pollution. 156(2): 332-40. Jayaratne, E.R., et al. 2010. Ions in motor vehicle exhaust and their dispersion near busy roads. Atmospheric Environment. 44(30): 36440-3650. bryophyte species. Environmental Pollution. 156(2): 332-40. Jayaratne, E.R., et al. 2010. Ions in motor vehicle exhaust and their dispersion near busy roads. Atmospheric Environment. 44(30): 36440-3650],* and there are four special status plants along the rail lines.

Response T8-73

Final EIS Chapter 3, Section 3.4, *Plants*, has been revised to reflect potential for impacts on plants related to emissions. The highest concentration of nitrogen dioxide and nitrogen oxides related to emissions from operation of the proposed action would result from rail-unloading operations at the project site. According to Honour et al. (2009),[9] impacts on vegetation are were documented at nitrogen oxide concentrations ranging from 77 to 98 micrograms per cubic meter (μg/m^3) and nitrogen dioxide concentrations ranging from 57 to 67 μg/m^3; other studies had similar conclusions (Davies et al. 2007, [10] Bignal et al. 2007[11]). Under worst-case conditions (maximum 1-hour concentration), nitrogen dioxide concentrations are estimated to be 114 μg/m^3 from the proposed facility at approximately 30 feet from the rail-loading area; however under annual average conditions the nitrogen dioxide concentrations would be in the range of 33 to 43 μg/m^3 at approximately 30 feet. Therefore, under worst-case conditions, the onsite emission could result in some impacts on vegetative growth and physiology, but these would be short-term and limited to areas near the project site, which include the industrial shoreline, roadways, and developed uses.

Rail transport along the PS&P rail line would emit nitrogen dioxide and nitrogen oxides; however, typical concentrations would be considerably lower (approximately 10 to 15 μg/m^3) than described

[9] Honour S., Bell J., Ashenden T., Cape J., Power SA. 2009. Responses of herbaceous plants to urban air pollution: effects on growth, phenology and leaf surface characteristics. *Environmental Pollution*; Vol. 157. N 4. P. 1279–86.

[10] Davies L., Bates J. W., Bell J. N. B., James P. W., Purvis O. W. 2007. Diversity and sensitivity of epiphytes to oxides of nitrogen in London. *Environmental Pollution*. Vol. 146. N 2. P. 299–310.

[11] Bignal K., Ashmore M., Headley A., Stewart K., Weigert K. 2007. Ecological impacts of air pollution from road transport on local vegetation. *Applied Geochemistry*. Vol. 22. N. 6. P. 1265–71.

for onsite operations (Section 3.2, *Air*) and are not anticipated to result in impacts on plant growth and physiology.

Comment T8-74

The DEISs discuss possible impacts from vessel wakes: "*It is anticipated that the potential for impacts could be roughly proportional to the anticipated increase in vessel traffic*." This indicates potential for erosion in critical habitats such as snowy plover and streaked homed lark habitat in the Oyhut Wildlife Recreation Area and on Damon Point. The possible impacts are not discussed in mitigation measures or as significant and unavoidable impacts. Further, the DEISs mention that impacts should be low because turbidity is already high, without support to back up this dismissal of impacts.

Response T8-74

As stated in Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, transit by deep-draft vessels through the navigation channel is typically planned when tidal elevations are close to high tides and outgoing loaded vessels may wait until the tide is even higher for safety purposes. As described in Section 3.4, *Plants*, this would result in little or no exposure of mud flat and shallower sloped beach areas. Moreover, the majority of the Grays Harbor shoreline is thousands of feet or more from the channel (e.g., the farthest point of the North Bay shoreline is 8 miles from the navigation channel). For these reasons, vessel wakes related to the proposed action were found to have small, incremental impacts on migrating fish, benthic habitats, and shoreline habitat and vessel wave energy levels generated by different types of ships at representative speeds were not modeled.

A 2003 wave modeling study conducted by Pacific International Engineering[12] (for the Port of Grays Harbor and coastal communities of southwest Washington) to address Washington Department of Natural Resources concerns about potential wave impacts on state- owned aquatic lands caused by the navigation channel in Grays Harbor concluded that, "energy from wind-generated waves generated in Grays Harbor and vessel-generated waves are shown to be insignificant in relation to the contribution from oceanic waves." The study focused on the Washington Department of Natural Resources Natural Preserve Whitcomb Flat, which is a sandflat that is mostly submerged during high tide and exposed during low tides; it is directly adjacent to the navigation channel and is the nearest unprotected erodible feature to the navigation channel. The study concluded that waves from vessels (a variety of large commercial vessels traveling at 15 knots were modeled) made an insignificant contribution to all waves and that natural waves (storm waves and swell from ocean) were the driving force that affected the movement and erosion of the sandflat. Therefore, any impact caused by vessel wake would be insignificant in comparison to the existing baseline conditions (natural wave incidence).

Comment T8-75

The DEISs do not address or analyze the risk or potential impacts of invasive species from rail traffic resulting from the proposed projects. Railways are a corridor for invasive species and increased railway activity could increase the distribution and rate of spread of invasive species. This could have an impact on the unique habitats, tribal resource plants, and special-status plants.

[12] Pacific International Engineering. 2003. Dynamics of Whitcomb Flats. Grays Harbor. July 10. Prepared for Port of Grays Harbor in Coordination with the Coastal Communities of Southwest Washington.

Response T8-75

Although it is possible that trains coming from other areas could have been exposed to invasive weed species, the chances of increased spread of weeds is low. Dispersal mechanisms for weeds from rail cars would most likely be from wind or rain carrying weed seeds onto adjacent areas. Given these conditions, it is not likely that weeds would be carried in great quantities or far from the rail line. Additionally, railroads are required to manage vegetation within the right of way, which would help to further reduce the potential for spread. For these reasons, this impact was not considered reasonably likely enough to be addressed in the Draft EIS.

Comment T8-76

The DEISs mention the risk of introducing aquatic invasive species via ballast water and the monitoring measures that will be undertaken; however, there is no analysis of the risk or likely impacts. Ballast water is one of the principal vectors of aquatic invasive species (Carlton, 1999) with invasive species being the second leading cause of extinction and loss of biodiversity in aquatic habitats. (US EPA, 2012). "Should an introduced species become a successful invader in a new environment, it can cause a range of ecological impacts. These include competing with native species and altering environmental conditions (e.g., increased water clarity due to mass filter-feeding), altering food web and the overall ecosystem and displacing native species, reducing native biodiversity and even causing local extinctions." (Ibrahim and el-Naggar 2012). The DEISs should analyze the economic and ecologic impacts of the likely introduction and spread of terrestrial and aquatic invasive species.

Response T8-76

Potential ballast water impacts on the aquatic environment are addressed in Draft EIS Chapter 3, Section 3.4, *Plants*, and Section 3.5, *Animals*. Existing federal and state regulations address ballast water management. The Washington State ballast discharge regulations (RCW 77.120.040 and WAC 220-150) include reporting, monitoring, and sampling requirements of ballast water; all vessels must submit nonindigenous species ballast water monitoring data. Washington Department of Fish and Wildlife may also board and inspect vessels under WAC 220-150-033 without advance notice to provide technical assistance, assess compliance, and enforce the requirements of Washington State ballast water management program laws and regulations. Penalties and enforcement of not complying with the regulations are covered in WAC 220-150-080. To further minimize the risk of ballast water on vegetation communities and animals, proposed mitigation is included in Sections 3.4 and 3.5 for the applicant to develop and implement a monitoring plan in consultation with Washington Department of Fish and Wildlife prior to the start of proposed operations.

Comment T8-77

13.1 WEEDS

There is no indication of where weeds will be deposited when they are removed from the project sites due to construction, or whether BMPs will be followed in order to reduce the risk of spreading invasive species. The Quinault Indian Nation recommends imposing this requirement.

Response T8-77

The applicant would prevent the potential establishment and spread of noxious weeds per Washington State noxious weed regulations (RCW 17.10). This weed law establishes and spells out property owners' responsibilities for preventing and controlling the spread of noxious weeds. If a property owner fails to control noxious weeds, the local weed board can impose civil fines for failure to control weeds. Any weeds removed from the project site would be disposed in accordance with these regulations. No additional measures are proposed.

Comment T8-78

13.2 MITIGATION MEASURES INADEQUATE

Only impacts from invasive species introduction via ballast water are addressed in the mitigation proposed. The DEIS does not, but should, address mitigation for the other additional impacts on plants from the proposed project activities. The mitigation measure to monitor for invasive species via ballast water should also include a protocol to respond to a detection of an invasive species.

Because the spread of invasive species by rail is not addressed in these DEISs, the proposed mitigation fails to take into consideration the adverse impact invasive species has on unique habitat, special-status plants, and tribal treaty resource plants. These adverse impacts are unavoidable and lack mitigation.

Response T8-78

The development of appropriate protocols for responding to invasive species would depend on the various factors; therefore, the mitigation measure proposes to develop a plan to monitor for and report any species to the appropriate authority so that appropriate action may be taken. The monitoring plan would be developed in consultation with Washington Department of Fish and Wildlife.

As noted in Draft EIS, Chapter 3, Section 3.4, *Plants*, the proposed action would not result in a significant impact on plants related to rail transport. Therefore, no mitigation is proposed.

Comment T8-79

14.0 OIL SPILL AND OPERATIONAL IMPACTS ON FISH AND WILDLIFE

These proposed projects will harm biological, marine, and aquatic resources on both public and private lands and waters. The harmful impacts run from the drilling of the oil in the middle of the North American continent, transport through the rail corridor to the Westway and Imperium projects, to the loading and shipping of the oil through the Grays Harbor estuary, past Bowerman Basin National Wildlife Refuge and other protected areas, to the final, and currently unknown, destination, and ultimate burning. These impacted resources include marine and terrestrial mammals, game and non-game resident and migratory bird species, raptors, songbirds, amphibians, reptiles, fish, shellfish, aquatic invertebrates, wetlands, and vegetative communities. Even in the best case scenario, one without a major oil spill, these projects will harm fish and wildlife through traffic, noise, and invasive species impacts. An oil spill would devastate the surrounding area and animal life. The DEISs acknowledge many of these harms but, shockingly, fail to concede their unavoidable and significant nature.

Response T8-79

The Final EIS *Summary* describes the potentially significant impacts that could not be completely eliminated with the implementation of the proposed mitigation measures. These include potentially significant impacts on noise, tribal resources, vehicle traffic, and environmental health and safety. As noted in Chapter 4, Section 4.7, *Impacts on Resources*, depending on the nature of an incident, the consequences could result in significant and unavoidable impacts on the natural resources referenced in the comment.

Comment T8-80

14.1 THE PROJECTS WILL HARM FISH AND WILDLIFE IN GRAYS HARBOR.

Risks to aquatic health in the vibrant Grays Harbor estuary-including potential harm to important Grays Harbor and Chehalis salmon populations-stem from oil spills from bulk carriers, impacts during construction (seafloor disturbance, increased turbidity, noise, lighting), impacts during operation (endemic oil spills, shading from pier and wharf, toxics from terminal's outfall pipes, night lighting, noise), chosen shipping routes and shipping traffic along those routes, and climate change itself.

There are numerous species in the area that would be affected by these proposed projects given their locations. The location on the shoreline of Grays Harbor is home to riverine and estuary fish like salmon along with bull trout, green sturgeon, coastal cutthroat trout, and Pacific eulachon. Grays Harbor itself is designated critical habitat for endangered sturgeon and threatened eulachon, and it is designated as critical habitat for the coastal-Puget Sound bull trout. Grays Harbor is also a nursery ground for sixgill and sevengill sharks. Grays Harbor is also a major nursery for Dungeness crab, oyster culture, soft-shell claims, horse claims, Manila clams, and cockles. The outer area of Grays Harbor is home to forage fish like surf smelt, Pacific herring, and sand lance. Wash. Dep't Natural Res. Scoping Letter at 3.

The Grays Harbor National Wildlife Refuge is also at risk from these proposals. From late April through early May, hundreds of thousands of shorebirds concentrate on the muddy tideflats of Grays Harbor estuary-one of only four major staging areas for shorebirds in North America and one of the largest concentrations of shorebirds on the west coast, south of Alaska. Likewise, the Oyhut/Damon Point area is one of only three nesting areas in Washington for federally threatened Snowy Plover. Washington Department of Fish and Wildlife Comments at 3 ("WDFW Comments Letter''). Grays Harbor is also home to bald eagles, great blue herons, and peregrine falcons. This area is a shorebird site of world significance, with up to one million birds in the area each spring.

Grays Harbor is inhabited and used by many species of marine mammals. Migrating and resident Gray Whales feed in the Grays Harbor. Thousands of harbor seals and California sea lions live and pup in Grays Harbor. Sea otters also live in Grays Harbor and are at risk from these projects.

There are many and various risks from these projects to fish and wildlife in Grays Harbor, from routine operation at the sites, to vessel traffic, including the possibility of spills. Grays Harbor is especially sensitive to spills. Between salt marshes and tidal flats that are vital to salmon, birds, and marine mammals, a spill would be catastrophic. Indeed, the majority of the shoreline habitat in Grays Harbor is the sh*oreline type most severely impacted by an oil spill. National Oceanic and Atmospheric Admin. Office* of National Marine Sanctuaries Scoping Letter at 2 (''NOAA Letter"). Crude oil is extremely toxic to fish and wildlife. Past oil spills have caused documented harm to aquatic fish

and shellfish. Oil spills release polycyclic aromatic hydrocarbons ("PAHs") into surrounding waters. (Oliveira M.B., 2009). PAHs include phenanthrene, anthracene, fluoranthene, pyrene, but, in general, low molecular weight PAHs can be directly toxic to aquatic organisms and harmful to humans, even due to chronic exposure to small amounts of crude oil. See Exh. 6, Schumacker Testimony at 13-15, 18, 19; Exh. 5, Jorgensen Testimony at 29, 32, 34, 35; Aas, 2000; Heintz, et al., 2000. Mastrangelo G. 1996. The metabolites of higher molecular weight PAHs are known carcinogens in humans. Previous studies and reviews of oil spills have documented PAH's rapid build-up in tissues of finfish and shellfish to levels dangerous for human consumption following spills of varying size. Seepage and small leaks over time may cause resident fish and shellfish to suffer chronic exposure to PAHs and allow these chemical compounds to accumulate in animal tissues. Id. Additionally, the use of oil dispersants will increase the exposure of fish to hydrocarbons in crude oil (Ramachandran, et al., 2004), though this was also not addressed in the DEISs.

A study of oil spill risks related to the Kinder Morgan pipeline expansion proposal in Canada concluded that a severe oil spill could kill more than 100,000 sea- and shorebirds. *[Footnote: Exh. 30, Jeffrey W. Short, Fate and Effect of Oil Spills from the Trans Mountain Expansion Project in Burrard Inlet and the Fraser River Estuary Prepared for Tsleil-Waututh Nation et al. at 10 (May 2015) ("Fate and Effect of Oil Spills").]* Different types of oil, of course, have different effects on the environment. Diluted bitumen may partially evaporate, float, and sink, depending on conditions, *id*., whereas Bakken crude typically floats, Westway DEIS at 3.14-8. Either would have devastating effects. For example, the catastrophic spill scenario killing 100,000 birds would cause tremendous direct oiling harm to species and leave the ecosystem entirely unbalanced, having unpredictable but long-lasting consequences. Fate and Effect of Oil Spills at 12.

Response T8-80

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the potential impacts on plants and animals from the release of crude oil and acknowledges that depending on the location, extent, and circumstances of a spill, the species identified in Chapter 3, Sections 3.4, *Plants*, and 3.5, *Animals*, could be adversely affected. These sections of the Final EIS have been updated to clarify the potential impacts on areas and species, including those listed in the comment. These revisions also acknowledge the potential for impacts related to polyaromatic hydrocarbons on fish and shellfish.

Draft EIS Chapter 4, Section 4.2.2.2, *Northwest Area Contingency Plan*, describes the planning framework in place for Washington State and discusses the factors considered when planning and implementing a response effort. The Regional Response Team is responsible for the Northwest Area Contingency Plan development that includes the consideration of dispersants or *in situ* burning.

Comment T8-81

A recent study shows that salmon and herring embryos exposed to even trace levels of crude oil grow into juveniles with abnormal hearts and reduced cardiorespiratory function. *[Footnote: Exh. 38, John P. Incardona, Very low embryonic crude oil exposures cause lasting cardiac defects in salmon and herring at 1, Scientific Reports (2015).]* Even very low embryonic exposure to very low amounts of crude oil, causes permanent structural and functional changes to the fish heart. Exh. 38, Incardona at 7. Cardiorespiratory function is a key determinant of survival and population recruitment, id, meaning that even small amounts of crude oil can pose dramatic risks to these at-risk species.

But even routine operation, without spills, would cause substantial harm to Grays Harbor and its fish and wildlife. For example, increased large vessel traffic will impact Pacific eulachon by harming

larval fish that have recently been confirmed to be present in the waters of the lower Chehalis River. Larval eulachon will inevitably be killed by large propellers associated with tankers and tugs that are part of this proposed project. Similarly, Gray whales are particularly susceptible to ship strikes, Washing Dep't of Fish and Wildlife Scoping Comments at 7, and the burrowing shrimp they feed on are susceptible to toxicity, also passed on to Gray whales, id.

Likewise, Dungeness crabs are hatched as minute, free swimming larvae that must shed their shells (molt) in order to grow. Grays Harbor has key refuges for juvenile crab in eelgrass, oyster shells, woody debris, and piling areas. But during their early years, Dungeness crabs remain extremely vulnerable to environmental stressors. Crab is the most valuable resource harvested on the Washington coast and Grays Harbor is an integral part of that production by acting as a juvenile crab refuge before they go to the open ocean. Exh. 6, Schumacker Testimony at 7, 15, 17, 19; Armstrong, et al, 2003. Without the Grays Harbor juvenile nursery, crab production on the outer coast would suffer significant impacts and recovery could take many years.

Response T8-81

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, addresses subacute and acute impacts of oil on fish. The section has been revised to acknowledge the potential for more lasting impacts on species as the result of a spill. Section 4.7 addresses oil toxicity to aquatic animals that inhabit various elements of the aquatic environment (e.g., water surface, water column, and substrate, intertidal, and shoreline habitats); impacts include the disruption of the estuarine food web and larger organisms feeding on small organisms that are contaminated, including invertebrates.

Draft EIS Chapter 3, Section 3.5, *Animals*, addresses the potential for vessel strikes on marine mammals. Final EIS Section 3.5 more fully addresses whale use of Grays Harbor, including frequent use by the gray whale.

Increased vessel traffic related to the proposed action in the study area could affect larval eulachon in the lower Chehalis River and Grays Harbor; however, based on the small area of impact in proportion to the amount of habitat available and the very low level of resulting mortality compared to the no-action alternative, the proposed action is not likely to have impacts on any eulachon population in the greater Grays Harbor estuary system. The cavitation and propwash zone around large vessel propellers could create conditions that could directly kill or result in injury and/or disorientation sufficient to lead to indirect mortality of any larval fish that pass through this zone. However, the area of impact associated with any given vessel is small in proportion to the amount of habitat available. The area of impact is defined by the cavitation and propwash zone around vessel propellers. This zone is restricted to a small portion of the 350-foot-wide navigation channel and only occurs when vessels are present. Eulachon larvae are dispersed by tides and currents throughout the entire Grays Harbor estuary. The proportion of eulachon larvae likely to be exposed to propeller impact zones from increased vessel traffic is miniscule. This conclusion is illustrated by an analysis conducted by the Oregon liquefied natural gas project on the potential impacts of vessel cooling water intake system impacts on Columbia River eulachon.[13] This analysis estimated that an increase in traffic of 120 liquefied natural gas ships per year would entrain approximately 0.01% of Columbia River volume during the period of larval migration, thereby resulting in an increase in larval eulachon mortality of approximately 0.01%. This is likely to be an overestimate because this

[13] CH2M Hill. 2009. Technical Memorandum: Analysis of ESA-Listed Salmon Entrainnment at Ballast and Colling Water Intakes. Prepared by R. Ellis, Ellis Ecological. April 29.

analysis relied on larval density rates observed downstream of known spawning areas that are not likely to be representative of the entire lower Columbia River.

The Oregon liquefied natural gas study used this very conservative (high) estimate of larval mortality to demonstrate that this level of effect is likely to be insignificant by comparison to documented natural mortality rates for larval fish. McGurk[14] compiled observed larval mortality rates for a variety of marine species from across the globe. The observed larval mortality rates for species with life history and larval habitat use comparable to the eulachon range from 10 to 41% per day. In practice, only a fraction of a percent of larvae survive to reach juvenile age in a typical year, the remainder die primarily from starvation and predation. The Oregon liquefied natural gas study concluded that even if vessel operations resulted in mortality of an unrealistically high 0.01% of larval eulachon in the lower Columbia River, that effect would be insignificant compared to the natural mortality rate. This provides a useful point of comparison for the proposed action. The propeller impact zone associated with a vessel operating in the Grays Harbor Navigation Channel represents a miniscule fraction of the total available habitat in the lower Chehalis River and Grays Harbor at any given moment. Therefore, the proportion of larval eulachon exposed to propeller impact zones on any given day would represent a fraction of a percent of the total number of larvae present. Even if all exposed larvae are killed, the effect would be insignificant compared to natural variability in the daily larval mortality rate. Extending this logic, propeller impact zones from increased vessel traffic would have an effectively unmeasurable impact on the proportion of larval eulachon that survive to juvenile age.

Comment T8-82

The DEISs acknowledge the tremendous risk of harm from invasive species as thousands of cubic meters of ballast water are discharged each visit. Westway DEIS at 3.4-16. The DEISs, however, have only required that the project proponents prepare an invasive species monitoring plan, *id*. at 3.5-31, without indicating what that plan must consist of or how it will reduce harms from invasive species.

Response T8-82

Refer to responses to comments T8-26 and T8-76.

Comment T8-83

The only other mitigation measure to protect Grays Harbor and its animal life is equally ineffective. Westway and Imperium have agreed to cease vessel-loading operations for a two-week period each year during the Grays Harbor Shorebird Festival. Id. at 3.5-21. Shorebirds do not confine their use of Grays Harbor to the Shorebird Festival-they live in and around the area at all times and are always present at high numbers. Rather than a mitigation measure to protect shorebirds, this requirement appears more like one to avoid displeasing birders during the festival. More is needed to be counted as mitigation.

Response T8-83

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds as well as other species in

[14] McGurk. M. D. 1986. Natural mortality of marine pelagic fish eggs and larvae: role of spatial patchiness. *Marine Ecology—Progress Series*. 34: 227-242.

the area, the Final EIS reflects revisions to clarify that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification.

Comment T8-84

Final EIS Chapter 4, Section 4.4.3, *What mitigation measures would reduce impacts related to terminal operations at the project site*? includes additional measures that would help to reduce the potential impacts associated with oil spills and, therefore, minimize the potential risks for affecting wildlife.

Additionally, stormwater is another critical concern, given the toxicity of the material being shipped. The surrounding water bodies are already listed as impaired under the state's § 303(d) list, and under Ninth Circuit precedent, any additional discharge to such impaired waters is prohibited. The provisions in the construction and industrial stormwater general permit are not adequate to the task of controlling toxic runoff from facilities into sensitive and impaired water bodies. This is particularly ominous given the DEISs acknowledgement of a substantial likelihood of spills occurring at the facility.

It goes without saying that a major spill would devastate marine and bird life in Grays Harbor. But that risk, and the risks from routine operations, goes far beyond the species to the people who have fished and gathered in this area since time immemorial. See supra Section 7. The Quinault and others use Grays Harbor to harvest Dungeness crab, Pacific halibut, Pacific whiting, salmon, lingcod, sablefish, nearshore flatfish and rockfish, forage fish, oysters, and razor clams. The Quinault Indian Nation holds treaty rights to 50% of the harvestable fish and shellfish within their treaty area, including Grays Harbor. For the Quinault, that harvest is critical, totaling on average value of $12,688,000. Exh. 6, Testimony of Ervin Joseph Schumacker at 3. The Quinault language has names for many of these species including "komolnil" (surf smelt) and "paagwals" (eulachon). *Id*. Harm to these species and treaty resources can be caused both through natural mortality or toxin accumulations that make the fish unsafe for human consumption. *Id*. Again, the treaty impacts have not been adequately addressed and cannot be adequately mitigated.

Response T8-84

Stormwater impacts are addressed in Draft EIS Chapter 3, Section 3.3, *Water*. The project site's surrounding water bodies are not listed as impaired under 303(d). The water quality information in the Draft EIS is based on the latest Washington State Department of Ecology and U.S. Environmental Protection Agency (EPA) water quality information reported under Clean Water Act Section 303(d). Based on the current U.S. EPA-approved 2012 303(d) assessment of impaired waters in Washington State, no area of inner Grays Harbor around the project site is listed as being impaired (Category 5 water). Washington State Department of Ecology sent the proposed 2014 list of impaired waters in Washington State to EPA in 2015, and approval is still pending. However, a review of the 2014 proposed 303(d) impaired water body listings shows no impaired waters (Category 5) for any part of inner Grays Harbor. Regardless, the project site would still need to comply with the National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharge to avoid discharge of contaminants into surface waters that would result in exceedance of water quality standards. The permit and stormwater system is designed to manage stormwater runoff and

associated contaminants for routine site operations; it is not designed for a catastrophic oil spill. Potential impacts of a large-scale oil spill are addressed in Draft EIS Chapter 4, *Environmental Health and Safety*, which acknowledges the risk and significance of an oil spill on the environment.

Final EIS Chapter 4, Section 4.7.1.7, *Tribal Resources,* reflects the addition of information clarifying that impacts on specific resources in the study area would have consequent impacts on the quality of and access to these resources for tribal economic, subsistence, and ceremonial purposes.

Comment T8-85

14.2 SPECIFIC IMPACTS NOT ADDRESSED

Washington Department of Fish and Wildlife recommended in previous scoping comments that the DEISs should include a series of status determination studies for key fish and wildlife populations in Grays Harbor and nearshore Pacific Ocean waters to establish a baseline prior to the expansion of the facilities. The DEISs failed to meet WDFW's recommendations and there is a need for additional information. The proponent should consult with Washington Department of Fish and Wildlife, USFWS, and the Quinault Indian Nation (a co-manager of fish species along with the state) to formulate a comprehensive analysis to determine the impacts on animals. Accurate mitigation measures cannot be identified without a complete agreed upon analysis.

Response T8-85

Draft EIS Chapter 3, Section 3.5, *Animals,* and Appendix F, *Special-Status Species,* provide information about the species that are known to or have the potential to occur within the study area. Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, reflects additional information about the potential impacts on sensitive species in the event of an oil spill, fire, or explosion. As noted in the Draft EIS, the potential impacts on wildlife from construction and routine operations would be addressed through compliance with required best management practices and proposed mitigation measures. Potential impacts associated with an oil spill, fire, or explosion would be unlikely but could be significant in the event of a large incident. Mitigation measures proposed in Chapter 4 would help to reduce potential impacts on wildlife in the event of an incident. The level of baseline information has been deemed sufficient for the purposes of supporting the conclusions presented in the Final EIS.

Comment T8-86

- Birds

The Migratory Bird Treaty Act (MBTA) is the primary legislation in the United States that was established to protect migratory birds. It prohibits the taking, killing, or possession of migratory birds or parts, nests, eggs of such birds unless permitted by regulation. Take under the MBTA is defined to take, capture, or kill, possess, offer for sale, sell , offer to barter, barter, offer to purchase, purchase, deliver for shipment, ship, export, import cause to be shipped, exported, or imported, deliver for transportation, transport or cause to be transported, carry or cause to be carried, or receive for shipment. The species of birds that are protected under the MBTA all appear in Title 50, Section 10.13 of the Code of Federal Regulations (50 C.F.R. 10.13) and include all avian families in North America.

The proposed action areas occur in Grays Harbor, which supports a wide variety of birds and their habitats. The DEISs proposed actions will occur in ecologically diverse habitats utilized by seabirds

such as alcids, shearwaters and gulls, shorebirds such as herons and sandpipers, and waterfowl such as ducks and geese. Vessel movements on the ocean surface have the potential to affect birds by disturbing or striking individuals and flocks. The increased vessel traffic will lead to both direct and indirect effects of migratory birds. There are several factors including presence and density of bird numbers, types of vessels, speeds, protective measures and time of year that will affect the probability of a ship and seabird collisions occurring in Grays Harbor. None of these impacts were assessed in the DEISs. The vessel strike sections only cover marine mammal strikes but do not mention avian strikes, which could result in a taking under the MBTA.

Take of a migratory bird will likely increase with the increase of vessel traffic in the harbor. Direct collisions with birds could occur in the water or flight with a vessel's rigging, wires, poles or masts. In addition, vessel transits will likely increase the probability of nighttime collisions, especially with common inclement weather such as fog or clouds common in Grays Harbor. There is no mitigation proposed to address these impacts to migratory birds.

The increase of vessel traffic will also lead to an increased presence of artificial light. Research (Black 2005) indicates that lighting on vessels may attract some birds and cause them to become disoriented. As the proposed action will occur in the Pacific Flyway for migratory birds this is a major concern not addressed. The DEISs have not properly analyzed what effects the increased artificial lights will have on migratory birds nor do they propose any mitigation to address these impacts.

The proposed DEISs acknowledge an increase of vessel traffic in Grays Harbor. The increase of vessel traffic will lead to an increase of expended materials that are being transported, including, but not limited to, crude oil. Birds of all sizes such as sea birds, shore birds and waterfowl are known to ingest a wide variety of marine debris that is commonly mistaken for prey. Because vessel traffic will pass by Damon Point, Bowerman Basin National Wildlife Refuge and the Grays Harbor Estuary, all of which are habitats of significance on the Pacific Flyway, the DEISs should have analyzed the likelihood and extent of expended materials impacts on migratory birds. In addition there is no proposed mitigation to address expended materials that might lead to direct take of migratory birds.

Response T8-86

The potential effect of vessel traffic on birds (movement patterns, strikes, ship lighting, and expended material) suggested by the comment is noted. The context in which to consider this potential impact is the use of the existing Grays Harbor navigation channel. As stated in Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, the large commercial vessels already using Grays Harbor include tankers, tank barges, cargo ships, cargo barges, RoRo vessels, and commercial shipping vessels, in addition to smaller fishing and recreation vessels. As stated in Section 3.17, hundreds of large commercial vessels currently transit Grays Harbor every year. As stated in Draft EIS Section 3.9, *Aesthetics, Light, and Glare*, vessel lights are designed to identify the vessel and its location but do not act as floodlights to illuminate the surrounding area. Given baseline conditions and the nature of vessel lighting, increased routine vessel traffic (less than one trip per day) under the proposed action would not have a significant adverse impact on birds.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted,

mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on birds.

Comment T8-87

One federally endangered species not mentioned in the DEISs is the California Brown Pelican (*Pelecanus occidentalis californicus*). Briggs et al. (1983) stated that large numbers can be found roosting during the winter season on sandy islands, protected from predators and winds, in Oregon and Washington. The total metapopulation of California Brown Pelicans has been estimated at 70,000 breeding pairs. (Stinson 2014). California Brown Pelicans disperse north seasonally along the Pacific coast from nesting areas in search of food, with small numbers dispersing as far as southern British Columbia. These birds are found in Washington's coastal waters, mainly from April through November with a peak in late July to early September; their numbers decline in October and November with the onset of stormy weather. Id. Areas of congregation during this season include Grays Harbor. Wahl and Tweit 2000 published a paper that conducted offshore surveys 1972-1998 from the mouth of Grays Harbor and recorded 32,533 California Brown Pelicans. They also found that 97% of the observations were recorded in channel or littoral waters that were less than 65 ft. deep.

The Washington Department of Fish and Wildlife confirmed the Brown Pelican (*Pelecanus occidentalis*) is currently listed as Endangered by the State of Washington. The DEISs fail to acknowledge this. Brown Pelicans present seasonally in Washington and belong to the California subspecies. (Stinson 2014). They nest on islands in the Gulf of California and along the coast of Baja California in Mexico north to Channel Islands National Park in southern California. In Washington, Brown Pelicans gather in communal roosts on sandy islands, exposed shoals, and a few artificial structures in the Columbia River, Grays Harbor, and Willapa Bay estuaries, and rocky islands off the coast of the Olympic Peninsula." *Id*. Stinson noted, "Oil spills and oil pollution remain a potential threat to Brown Pelicans." There is no analysis conducted in the DEISs to assess the potential impacts to the California Brown Pelican or Brown Pelican.

Response T8-87

The brown pelican is covered in the Draft EIS (Appendix F *Special-Status Species*); brown pelicans present seasonally in Washington belong to the California subspecies (*P. o. californicus*). Impacts described in Draft EIS Chapter 3, Section 3.5, *Animals,* and Chapter 4, Section 4.7, *Impacts on Resources,* (for oil spills) apply to the brown pelican, as well as all other birds. The brown pelican is not a federally endangered species as suggested by the commenter; it was delisted in 2009 due to recovery and it is currently a species of concern. Washington Department of Fish and Wildlife has recommended that the brown pelican be removed from Washington's list of endangered species based on their latest status review from October 2015 (because they are not immediately threatened). "*We recommend that the Brown Pelican be removed from Washington's list of endangered species*."[15] On November 6, 2015, Washington Department of Fish and Wildlife formally

[15] Washington Department of Fish and Wildlife. 2015. *Periodic Status Review for the Brown Pelican*. Prepared by Derek W. Stinson. October.

proposed to delist the brown pelican by proposing to amend WAC 232-12-014.[16] The department filed a notice of rule change on May 6, 2016.[17]

Comment T8-88

- Marine Mammals

The DEISs fail to include or address sea otters (*Enhydra lutris*) that are protected under the Marine Mammal Protection Act and Endangered Species Act ("ESA") (listed as threatened in 1997). The primary reason sea otters were listed under the ESA was due to the risk of oil spills in its geographically constricted Range (USFWS 1997). Sea otters occupy most coastal habitats including bays, estuaries and rocky shores that include Grays Harbor. Sea otters were historically and culturally harvested by the Quinault Indian Nation for pelts.

The DEISs have no assessment of the potential impact of oil spills or vessel collisions that might impact sea otter populations. The Exxon Valdez that ran ashore in Prince William Sound Alaska proved to have a drastic impact on sea otter mortality estimated mortalities from 500-5,000. (Garrott, et al., 1993.) The DEISs fail to properly address or analyze the potential impacts to sea otter populations in Grays Harbor.

The DEISs state the greatest likelihood of striking marine mammals is in the shipping lanes but do not acknowledge the presence of Gray Whales, Harbor porpoise, Stellar Sea Lions, CA Sea Lions, Harbor Seals, all of which frequent Grays Harbor. It is incorrect that larger whales do not frequent Grays Harbor; Gray Whales are common, according to the Department of Ecology. See http://www.ecy.wa.gov/programs/sea!coast/animals/gray_whale.html.

Response T8-88

The sea otter is listed as one of the special-status species in Appendix F, *Special-Status Species*, which supports Section 3.5, *Animals*. Based on Washington Department of Fish and Wildlife's sea otter recovery plan, sea otters are rare near Grays Harbor. While they were historically found in waters off Grays Harbor, their current distribution is concentrated almost exclusively on rocky habitat along the Olympic Peninsula Coast and western Strait of Juan de Fuca; these areas are well outside of the study area. However, in the unlikely event a sea otter were to be found in Grays Harbor, the Draft EIS impact analyses cover impacts on the species because the discussion for marine mammal impact mechanisms (noise, vessel collisions, and oils spills) covers all species collectively. Potential large-scale oil spill impacts on animals in the study area (aquatic and terrestrial) are specifically addressed in Chapter 4, Section 4.7, *Impacts on Resources*.

The Draft EIS acknowledge that harbor porpoises, Steller sea lions, California sea lions, and harbor seals are found in the study area, which includes Grays Harbor (Chapter 3, Section 3.5, *Animals,* and Appendix F *Special-Status Species*). Final EIS Chapter 3, Section 3.5, *Animals,* reflects new information to address whale use of Grays Harbor, including frequent use by the gray whale.

The vessel impact mechanisms described in Draft EIS Section 3.5 remain the same, but marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a higher

[16] Washington Department of Fish and Wildlife. 2015. Determination of Nonsignificance. Delisting Brown Pelicans as a State Endangered Species. DNS 15-059. November 6.

[17] Washington Department of Fish and Wildlife. 2016. Rule-Making Order . Brown Pelican Delisting. May 6. Available: http://wdfw.wa.gov/about/regulations/2016/wsr_16-11-023.pdf.

risk from vessel strikes. Final EIS Chapter 3, Section 3.5.5.2 *Proposed Action*, *Operations*, reflects information to address the higher risk for these species. Even though the Draft EIS states that the greatest likelihood of a vessel striking a marine mammal is in the shipping lanes, this impact in the actual study area is not precluded from the analysis because the impact analysis covers the entire study area, which includes Grays Harbor. The description of the affected environment and the impact analysis is for the entire study area, as described in Section 3.5.3.2, *Impact Analysis*. Therefore, the vessel strikes impact section covers all marine mammals in the entire study area, regardless of how rare or common those species may be in the study area.

Comment T8-89

- Fish

The DEISs do not accurately describe the animals found in the study area:

  - The timing of Chinook migration was mischaracterized. Fall-run adults return to the freshwater rivers and streams to spawn and pass through Grays Harbor from mid-August to mid-October, not in September as stated. Spawning of fall Chinook occurs from mid-October into late November. Spring-run adults are likely to pass through Grays Harbor in April (entering the fisheries from April through August) on their return trip to spawn in upper tributaries (from late August to mid-October).
  - Steelhead Trout actually enter the fishery from November to mid-April and spawn from mid-March until the beginning of June, not between January and March as indicated in the DEISs.

Response T8-89

Final EIS Chapter 3, Section 3.5.4.3 *Grays Harbor*, *Aquatic Habitats*, *Fish*, reflects additional information to address the distinction between the presence of Chinook salmon and steelhead in Grays Harbor and the timing of river entry. This new information does not change the analysis or conclusions of the Draft EIS.

Comment T8-90

The DEISs fail to assess the potential affects from photo-enhanced toxicity. Photo-enhanced toxicity occurs when some of the compounds in bitumen dissolve into water and are absorbed by translucent embryos. This mechanism has been shown to negatively affect species such as Pacific herring embryos by burning them. (Short, 2015).

The DEISs fail to acknowledge the potential negative impacts from the project to macroinvertabrates on which salmonids feed upon in fresh and brackish waters. Ort et al., found Mayfly survival reduced upon a 21-day exposure to oil-contaminated sediments. Furthermore they found the persistence effects of freshwater oil spills should be thoroughly investigated when determining the length of time required to assess the extent of environmental injury following a spill.

Response T8-90

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, reflects additional information to address photo-enhanced toxicity as another potential impact from an oil spill. There are a considerable

number of studies and information on the potential impacts of oil on aquatic resources and physiological functions of aquatic species; these studies cannot all be discussed and listed. However, it should be noted that Draft EIS Section 4.7, *Impacts on Resources*, summarized the range of adverse impacts that could occur.

Comment T8-91

The DEISs fail to identify or analyze impacts and mortality resulting from propellers and prop-wash from tankers and tugboats on small fish, larval crab and other treaty resources. Propeller turbulence from tankers and tugboats will inevitably kill small fish and crab larvae within and outside the Harbor. There is no feasible method for excluding small fish and crab larvae from the prop-wash and therefore some will be killed as a direct result of increasing large vessel traffic. Fish killed would likely include out-migrating salmonids a11.d various forage fish including the ESA-listed Pacific eulachon. Exh. 6, Schumacker Testimony, 24.

Response T8-91

Refer to Response to Comment T8-81. The McGurk study[18] compiled mortality data on a variety of fish eggs, larvae, juveniles, and invertebrates; the same rationale that applied to eulachon applies to other species. The proportion of these species in these life forms exposed to propeller impact zones on any given day would represent a fraction of a percent of the total number present.

Comment T8-92

The DEISs address underwater vessel noise by stating that impacts from vessel noise on animals can be severe, then go on to say that impacts will ". . . increase somewhat under the proposed action, as a result of increased vessel trips." There is no evidence in the discussion to justify the use of "somewhat." In fact, the preceding information indicates probable significant impacts, yet vessel noise is not mitigated or mentioned in the significant and unavoidable impacts.

Response T8-92

The Draft EIS states that the impacts from vessel noise on animals could be mild to severe, but the paragraph that the commenter's text is taken from in the Draft EIS goes on to state that, "[t]he effects of increased noise associated with vessel trips would depend on many factors, including vessel type, size of vessel, species of animal, vessel location, and location of animal relative to vessel and the intervening environment" and that the wide range of potential impacts and variable factors "[make] it challenging to broadly characterize impacts of shipping noise on marine mammal species (Ellison et al. 2012 in Joint Working Group on Vessel Strikes and Acoustic Impacts 2012:9)." The word "somewhat" in the sentence referenced by the commenter is not being used to describe the severity of the impact but is being used to indicate that the potential impacts would increase to some extent "as a result of increased vessel trips." The majority of aquatic species that would be exposed to underwater vessel noise have hearing frequencies outside of the frequency generated by tankers. As stated in Chapter 3, Section 3.5, *Animals*, tankers exhibit underwater noise frequencies in the lower end of the shipping noise spectrum (40 Hertz), which is below the lower hearing threshold of most marine animals except for some baleen whales (Figure 3.5-1). As stated in Section

[18] McGurk. M. D. 1986. Natural mortality of marine pelagic fish eggs and larvae: role of spatial patchiness. *Marine Ecology—Progress Series*. 34: 227-242.

3.5, tank barges would produce even less near-surface sound. For these reasons, the potential impacts are not considered significant.

Comment T8-93

14.3 INCREASED SEDIMENTATION

The DEISs identify the potential water quality impacts from increased sedimentation caused by increased vessel traffic, on site construction activities, dredging actives, oil spills, and fire hazards from the proposed actions. Yet the DEISs fail to analyze the effects of increased sedimentation on animals, in particular fish life. Increased sedimentation causes high turbidity and suspended sediment levels, which is associated with negative effects on the spawning, growth, and reproduction of salmonids (Bash et. al., 2001).

The DEISs acknowledge the fact that bioaccumulative toxins are present in sediments near the project site and could be released during dredging activities. The DEISs fail to include the fact that six individual chemical criteria were exceeded at the Grays Harbor Paper Mill in an investigation conducted by the Department of Ecology in 1999 (Norton, 1999). The DEISs fail to analyze how the release of these contaminant could affect animals and treaty-protected resources. For example 4-methylphenol was detected by Ecology but not reported in the DEISs. A report by the USFWS found that when dredging occurs, winds and tides re-suspend sediment throughout the harbor which remain in the food chain and negatively affect salmonids. The applicant must meet WAC 173-204 Sediment Management Standards, these standards are set in place to protect federally listed species. The DEISs should include a full Sediment Evaluation with procedures and tests compliant with WAC 173-204.

Response T8-93

The Draft EIS addresses potential impacts of suspended sediment on water quality, plants, and aquatic animals in Section 3.3 *Water*, Section 3.4 *Plants*, and Section 3.5 *Animals*. The Draft EIS states, "these contaminants could have toxic acute or subacute impacts on aquatic organisms and could affect photosynthesis, oxygen exchange, and the respiration, growth, and reproduction of aquatic species." However, the proposed action would require a National Pollutant Discharge Elimination System (NPDES) construction stormwater general permit and an NPDES industrial stormwater permit to address potential impacts on water quality from construction and operation, respectively. The Clean Water Act NPDES regulatory mechanisms and permits set limits on what can be discharged, prescribe monitoring and reporting, and set provisions to ensure that the discharge from a site does not adversely affect water quality. Impacts on the aquatic environment would be significantly reduced through compliance with these permitting requirements. The applicant would also comply with the sediment management standards and requirements found in WAC 173-204 during construction and operation of the proposed action.

The potential for vessel-induced sedimentation impacts on aquatic organisms is not anticipated to be significant because vessels would be confined to the existing deepwater navigation channel. As stated in Draft EIS Chapter 3, Section 3.3 *Water*, the areas of the terminal and the Cow Point Turning Basin already have existing high baseline turbidity levels. Any resuspension of sediments from vessel movements or propeller wash in this area of existing high turbidity levels is likely to have little or no additional effects on the benthic communities or other aquatic species. Similarly, because temporary resuspension of sediments in the navigation channel occur on a regular basis, it is unlikely that vessel traffic associated with the proposed action would cause any perceptible effects

on the benthic communities and aquatic organisms, which are already adapted to the disturbance in the navigation channel. As such, these potential impacts are not expected to be significant (as defined by SEPA regulations WAC 197-11-794) given the context and existing baseline conditions.

The proposed action does not include dredging of any kind and no-in water work is proposed for any element of the proposed action. The U.S. Army Corps of Engineers conducted extensive sediment sampling for more than 50 compounds (including 4-methylphenol) in 2013 for their proposed navigation channel dredging activities in Grays Harbor[19] and did not find any exceedances of the dredge material management program screening guidelines, with the exception of one chemical in one location in Cow Point Reach—benzyl alcohol; but in subsequent rounds, this chemical was either below the screening level or undetected. The U.S. Army Corps of Engineers states that benzyl alcohol is not a bioaccumulative chemical of concern and does not have a bioaccumulation trigger. Dredging and placement of dredged materials are evaluated by the dredge material management program agencies: the U.S. Army Corps of Engineers, Washington State Department of Ecology, Washington State Department of Natural Resources, and U.S. Environmental Protection Agency.

Comment T8-94

14.4 THE PROJECTS WILL HARM FISH AND WILDLIFE ON THE MARINE ROUTE BEYOND GRAYS HARBOR.

Like Grays Harbor itself, the areas on the marine route are the vibrant homes to many species that would be put at risk from these projects. The nearshore Pacific ocean is critical habitat for species listed under the ESA, including leatherback sea turtle, green sturgeon, and Eulachon. It is essential fish habitat for West Coast salmon, ground fish, forage fish, and coastal pelagic sharks. It is also important for thresher sharks and juvenile and adult rockfish.

Vessels going north out of Grays Harbor would pass Olympic National Park and offshore colonies of nesting seabirds, rocky haul-outs for seals and sea lions, and the Washington Maritime National Wildlife Refuge Complex. It is also home to bull trout, steelhead, and Chinook, chum, coho, sockeye, and pink salmon. That area is also frequented by orcas, and it is designated as critical habitat for the southern distinct population segment of green sturgeon. It is the site of the Olympic Coast National Marine Sanctuary, including hundreds of islands where the largest seabird breeding colonies in the region live under federal protection by the Washington Islands National Wildlife Refuges. NOAA Letter at 1. The coastal area north of Grays Harbor is also part of the Quinault Indian Nation's treaty area and contains the primary harvest for Dungeness crab, razor clams, troll-caught salmon, lingcod, various rockfish species, and many species of intertidal organisms such as anemones and limpets also consumed by Quinault. Schumacker at 8.

As the DEISs acknowledge, many ESA-listed whale species live off the Washington coast near Grays Harbor, including blue, fin, and sei whales, sperm whales, orcas, and humpbacks. Other whale species like the pygmy sperm whale and the common minke also live in the area. Many species of turtles also live near the ocean coast, including leatherbacks, loggerheads, and olive ridleys.

[19] U.S. Army Corps of Engineers. 2014. *Grays Harbor, Washington Navigation Improvement Project General Investigation Feasibility Study FINAL Limited Reevaluation Report*. Appendix C: FINAL Supplemental Environmental Impact Statement. June. Seattle District.

A spill in Grays Harbor could flush out and devastate these areas and wildlife. Effects from the *Nestucca* oil spill affected areas all the way from the Oregon coast to Vancouver Island. WDFW Comments at 2. A repeat would be disastrous as high mortality rates are seen as results of major oil spills, such as the *Exxon Valdez* spill. WDFW Comments at 4. Any oil spill in this area could devastate a number of fisheries and cultural resources. For example, Quinault consider the Pacific razor clam a part of their cultural identity, and they have harvested them for millennia in this area. Large middens of razor clam shells have been uncovered in archaeological excavations on the shores north of Grays Harbor. These clams reside in sandy beaches in the intertidal and subtidal nearshore areas of the coast. Schumacker Testimony at 8. Indeed, recent studies have shown that razor clams may be particularly vulnerable to oil spills. Id. at 8-9.

Response T8-94

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Comment T8-95

14.5 THE PROJECTS WILL HARM FISH AND WILDLIFE ON THE RAIL ROUTE TO THE PROJECTS.

The rail routes from the extraction points in Alberta and North Dakota to the projects are home to numerous species that would be harmed by the increased rail traffic and threat of spills. The Chehalis, Humptulips, Wishkah, Johns, Elk, and Hoquiam rivers provide vital habitat for all life stages of salmonids and other fish; the effects to fish habitat from a crude spill could be irreversible. Local, state, federal, and tribal entities contribute millions of dollars a year to protect and restore declining estuarine and freshwater habitat, yet the cumulative effects over time of these projects could directly compromise these efforts. The rail route crosses streams with habitat for federally threatened bull trout, including the Wishkah River, Satsop River, and Wynoochee River-all of these are designated as critical habitat for the species. Westway DEIS at 3.5-7. The rail route also crosses habitat for state species of concern westslope cutthroat trout. The DEISs acknowledge that there are many other special-status species that live along the PS&P rail line, including northern spotted owls, marbled murrelets, and pocket gophers. Westway DEIS at 3.5-6. The rail route would also likely affect National Parks and the animals living in them, including grizzlies. National Park Service Scoping Comments at 2-3.

Response T8-95

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment T8-96

Oil spilling into waters along the train routes would have a significant impact on resident and anadromous fish runs, potentially devastating them. Additionally, grizzlies and other wildlife are at risk from collisions, and this can lead to secondary mortality when adult animals are become unable to care for their young.

Growing infrastructure also results in the fragmentation of wildlife habitat, which can result in the decline of wildlife populations and ecosystem diversity (Hansen & DeFries 2007). Building or increasing the use of rails can hinder the movement of wildlife and thus ecological process. The increase of rail traffic from the proposed projects will cause stress and contribute to increased mortality rates in wildlife populations. Decreased wildlife movement will result in lower immigration rates that will lead to more habitat fragmentation and support lower wildlife populations which can lead to lower reproduction, lower genetic diversity and even possible local extinction. The proposed rail line was not analyzed for wildlife connectivity. Yet Grays Harbor and the Olympic Peninsula contain recently reintroduced and proposed candidate species Fisher (*Martes pennati*) and contains high quality wolf (*Canis lupus*) habitat (Olympic National Park). Wolves were classified as Endangered in 1973 federally and Endangered in 1980 by the State of Washington under ESA. The current wolf recovery plan in the State of Washington calls for the recovery of wolves in a diverse geographic range including the Western third of the State. The DEISs do not analyze the potential impacts on wildlife connectivity from the proposed rail operation increases and have no proposed mitigation measures to address such impacts.

Response T8-96

The potential for impacts in the extended study area is addressed qualitatively for the reasons discussed in the Master Response for the Geographic Scope. Wildlife collisions with trains in the study area are addressed in Draft EIS Chapter 3, Section 3.5, *Animals*. The section in the Final EIS reflects additional information to address related potential impacts on dependent young. Refer to Response to Comment T8-35.

Comment T8-97

Based on the foregoing errors, inadequacies, and omissions, the Quinault Indian Nation disagrees with the assertion that ''there would be no unavoidable and significant adverse impacts" on fish and wildlife.

Response T8-97

Comment acknowledged.

Comment T8-98

15.0 PUBLIC HEALTH

Ecology and Hoquiam have not prepared a Health Impact Assessment ("HIA") for this project. As the Washington Department of Health explained in reference to a similar crude-by-rail project on the Columbia River:

> A Health Impact Assessment is a tool that communities and decision-makers can use to objectively evaluate the potential health effects of a project before it is built. A Health Impact Assessment includes a process for bringing together public input and project-relevant data to make recommendations that minimize adverse health effects. *[Footnote: Exh. 39, Comments from the Washington Department of Health to EFSEC regarding Scope of the EIS for Tesoro-Savage (Dec. 17, 2013).]*

A Health Impact Assessment can evaluate the significant public health impacts outlined in the Washington Department of Health's SEPA scoping comment letter to EFSEC for the Tesoro-Savage project, which include the impacts of: diesel exhaust; passenger vehicle emissions; greenhouse gas emissions; noise; rail traffic and access to emergency care; spills and drinking water systems and supplies; train derailments; rail traffic and pedestrian safety; rail traffic and recreation; and rail traffic and community wellness impacts. *[Footnote: Id.]*

The DEISs do not present a full public health impact analysis. While the DEISs present some public health information, see, e.g., Imperium DEIS at 3.2.5 (potential impacts on air quality) and at 3.7 (noise and vibrations), impacts are discussed in separate sections which makes it difficult to comprehend the complete public health impacts involved with these projects, as well as the way these impacts interact to affect public health. As another example, while the impacts of delays at rail crossings is discussed, those delays are not linked to public health concerns for emergency responders (although the DEIS does identify significant, adverse impacts to emergency response services, Westway DEIS at S-45). The DEISs must be revised to consider the information presented in a literature review report prepared by the Oregon and Washington chapters of Physicians for Social Responsibility and disclose these impacts to the public. *[Footnote: Exh. 40, Washington Physicians for Social Responsibility and Oregon Physicians for Social Responsibility, Position Statement on Crude Oil Transport and Storage to Governors of Washington and Oregon (May 2015).]* The report highlights the significant body of research demonstrating the significant, negative impacts of oil-by-rail pollution on public health.

Response T8-98

SEPA does not require that a formal health impact assessment be conducted as part of an EIS. The Draft and Final EIS do consider the following impacts related to human health.

- Chapter 3, Section 3.2, *Air*, describes potential impacts on air quality and the potential for increased cancer risk from emissions of diesel particulate matter related to construction and routine operation of the proposed action.
- Chapter 3, Section 3.7, *Noise*, describes potential impacts on sensitive receptors near the project site and transportation corridors from increased noise and vibration related to construction and routine operation of the proposed action.
- Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, describes potential impacts on public safety and emergency vehicle access from increased vehicle delay related to rail traffic from routine operation of the proposed action.
- Chapter 4, Section 4.7.1.7, *Human Health*, describes potential impacts of an oil spill on human health. Final EIS Section 4.7.1.7 has been revised to more fully describe potential impacts.
- Chapter 4, Section 4.7.2.3, *Human Health*, describes potential impacts of a fire or explosion on human health. Final EIS Section 4.7.2.3 has been revised to more fully describe potential impacts.

Comment T8-99

15.1 NOISE

Noise in particular can be an overlooked public health issue. "Excessive noise seriously harms human health and interferes with people's daily activities at school, at work, at home and during leisure time. Noise can disturb sleep, produce cardiovascular and psycho-physiological effects, reduce performance, and provoke annoyance responses and changes in social behavior.' Studies have shown that as environmental noise increases, children's performance on tests of reading ability and memory decreases. Research also shows that noise from road traffic and airplanes can negatively affect cardiovascular health in adults, and may influence blood pressure in children. Studies have also found links between environmental noise exposure and feelings of well-being." *[Footnote: Id. See also Exh. 7, Direct Testimony of Frank James.]*

The DEISs find significant adverse impacts to public health from noise that cannot be mitigated. Westway DEIS at S-40 ("Increased rail traffic related to the proposed action could increase noise levels for residents and other sensitive groups along the PS&P rail line.") *id*. at S- 60 (same for cumulative impact analysis, calling the increase "substantial").

Response T8-99

Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*, presents an analysis of noise impacts including noise from trains related to the proposed action. The analysis uses the Federal Railroad Administration (FRA) adopted noise assessment methods developed by the Federal Transit Administration (FTA). Per these methods, noise-sensitive land uses are identified within approximately 500 feet of the PS&P rail line for wayside noise and within 1,000 feet of grade crossings for train horn noise. No schools in the study area are within these distances.

As noted in Section 3.7.6.2, *Proposed Action*, the loudest hour (measured in Leq) at grade crossings and wayside locations under the proposed action would result from a single train passby, which occurs under existing conditions. This means the maximum hourly noise levels would not change. Because freight rail traffic does not run on a schedule, the analysis assumes rail events related to the proposed action are evenly distributed over a 24-hour day. No moderate or severe impacts on

sensitive receptors were identified for train wayside noise. The analysis identified moderate and severe noise impacts at residential receptors adjacent to grade crossings, due to the increase in horn noise events related to the proposed action over a 24-hour day. No moderate or severe impacts are predicted at schools.

The FRA/FTA criteria are based on a 24-hour average sound level that is weighted for events that occur at night. While the addition of approximately one train pass per day on average under the proposed action would increase the average daily noise level from horn soundings at rail crossings, and in some cases result in the impacts described above, the actual horn noise associated with any given train passage would not increase under the proposed action.

Section 3.7 identifies a proposed mitigation measure for the applicant to support local communities in applying for quiet zones at crossing where severe impacts from increased train horn soundings were identified. Where implemented, quiet zones would eliminate impacts. The Draft EIS acknowledges that where quiet zones were not implemented at these crossings, the potential for severe impacts would remain.

Comment T8-100

15.2 AIR QUALITY

While DEIS section 3.2.5.2 describes air quality impacts that could occur in the study area as a result of construction and routine operation of the proposed action, it omits impacts indirectly caused by the projects, such as the increase in traffic on roads, rails, and by water. The following information is needed to provide a complete picture of the proposals' air quality impacts: (1) emissions from vehicles idling at rail crossings; (2) emissions from backup power generation; and (3) all indirect changes in locomotive activity (e.g. idling of non-project-related locomotives) due to increased rail congestion caused by this project.

Response T8-100

In Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic*, the vehicle traffic analysis demonstrates that increases in vehicle delay for the majority of the PS&P rail line would be minimal compared to existing conditions and the no-action alternative. Therefore, a detailed analysis of increased emissions from vehicle idling was not deemed necessary. Similarly, backup power generators would run infrequently and only in the case of emergency and would not have likely result in substantial emissions. As noted in Section 3.2, *Air*, switch engines associated with the proposed action were included in the emissions calculations. Although there would be increased activity in and around Poynor Yard during the arrival and departure of a train going to or from the project site, PS&P would manage arrivals and departures in this area in coordination with its other customers. Additionally, other trains in the vicinity use the Port's loop track, which has sufficient capacity to accommodate existing rail traffic.

Comment T8-101

On the issue of sensitive receptors (defined as members of the population who are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses), the DEISs list a disturbing number of schools, hospitals, day care centers, convalescent facilities, senior centers, and parks or recreational facilities located near the project site, along the PS&P rail line between Centralia and the project site, and along the shoreline of Grays Harbor.

The DEISs lack data regarding how individuals who live in and around these areas may be specifically affected by anything other than a risk of cancer. For example, asthma is listed as a possible health effect associated with this project. According to the Washington State Department of Health, more than 600,000 people in Washington have asthma and the U.S. Centers for Disease Control and Prevention have identified Washington's asthma prevalence as among the highest in the nation, and steadily increasing. Asthma results in days lost at school and work, high medical costs, loss of income, and other detrimental outcomes. More information is needed regarding the health effects associated with increased ambient concentrations of pollutants to be caused by the projects including but not limited to asthma, respiratory, and cardiac illnesses. This analysis should include evaluation of impacts on communities already burdened by air-related health impacts and/or other identified environmental justice communities.

Response T8-101

Draft EIS Chapter 3, Section 3.2, *Air*, acknowledges that diesel particulate matter is linked to numerous health effects including asthma attacks and worsening of asthma symptoms. The cancer risk analysis of diesel particulate matter was specific to lung cancer and other forms of inhalation cancer. The other issues identified in the Draft EIS, including those listed by the commenter, are acute responses. To date, the U.S. Environmental Protection Agency (EPA) and the Office of Environmental Health Hazard Assessment (OEHHA) have not found sufficient evidence to fully understand the mechanism of exposure and clear dose-response relationships for these acute responses, and have precluded development of recommendations about levels of exposure that would be protective.

The current chronic reference exposure level for diesel particulate matter[20] used in the analysis, 5 $\mu g/m^3$, was developed by EPA and adopted by OEHHA as the level below which no adverse non-cancer health effects are likely to occur from lifetime exposure to diesel particulate matter. This estimate considers persons who may be more sensitive to the effects of diesel particulate matter. Thus, short-term exposure to levels below 5 $\mu g/m^3$ would not pose any adverse health effects. The annual average diesel particulate matter concentration would be much lower than this level; therefore, diesel particulate matter emissions related to the proposed action would have no long-term, non-cancer health effects.

Comment T8-102

A valid SEPA analysis must consider air pollution impacts that specifically accompany transporting oil. Transportation of crude oil long distances creates harmful air emissions from diesel locomotives. These effects will have a significant impact on the ability of air quality control regions through which the trains pass to meet the National Ambient Air Quality Standards-standards which are set to protect public health. As trains journey from North Dakota or Canada to Grays Harbor, they will pass through numerous non-attainment and maintenance areas. The DEISs omit this information because they artificially restricted their scope of review, as discussed above.

[20] U.S. Environmental Protection Agency. 2014. *Diesel Engine Exhaust.* Available: https://cfpub.epa.gov/ncea/iris2/chemicalLanding.cfm?substance_nmbr=642

Response T8-102

Final EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses air quality impacts in the extended study area qualitatively. Refer to the Master Response for the Geographic Scope of the EIS for an explanation of the scope of the analysis in the extended study area.

Comment T8-103

The DEISs also downplay the impacts of criteria air pollutants (Imperium DEIS at p. 3.2- 11 to -12) because they are not modeled to violate the national ambient air quality standards (NAAQS). Public health problems can persist, even without air quality standard violations. The DEISs should particularly review fugitive emissions of VOCs (volatile organic compounds) escaping from tank cars and from the unloading and loading processes. Especially for Bakken crude, VOC emissions at other crude-by-rail facilities have been higher than predicted or modeled.

Response T8-103

Draft EIS Appendix D, *Air Data*, Table 5, reports onsite emissions of criteria and air toxic pollutants, including fugitive emissions during filling and draining and from storage tank valves and flanges. It also reports onsite emissions of these pollutants from annual storage tank cleaning, operation of the marine vapor control system during vessel loading, and onsite rail operations and vessel hoteling.

The Final EIS reflects updated stationary source emission estimates based on the applicant's revised Notice of Construction application to the Olympic Region Clean Air Agency (ORCAA), which reflects requested ORCAA revisions to apply a more conservative crude oil Reid Vapor Pressure based on review of recently published crude oil data.

As noted in Section 3.2, *Air*, prior to operation, the applicant will be required to obtain a permit from ORCAA, which limits the amount of emissions allowed by the applicant to safe levels.

Comment T8-104

The Quinault Indian Nation recommends requiring the installation of monitoring equipment near the proposed facilities to monitor air quality. If levels are found to exceed the standards, actions to reduce the emissions must be required. The Quinault Indian Nation recommends that air quality monitoring data be available in real time in a way that would be reasonable and convenient for a fisher or gatherer, and the public, to access.

Response T8-104

Draft EIS Chapter 3, Section 3.2, *Air*, identifies the impacts to air quality and health risk assessment. The National Ambient Air Quality Standards (NAAQS) have been developed by the U.S. Environmental Protection Agency for widely emitted air pollutants to protect the health of the most susceptible populations. Section 3.2 shows that no violation of the NAAQS would occur during operation of the proposed action. Therefore, no mitigation has been recommended.

Section 3.2 also addresses the potential impacts of emissions of air toxics and identifies that that no air toxic would be above Washington State Department of Ecology's Acceptable Source Impact Level. Because of the concern with diesel emissions, which is primarily from locomotive emissions, and the potential for increased cancer risk, a diesel particulate matter cancer risk assessment was completed for the EIS.

Final EIS Section 3.2 reflects revised assumptions regarding rail operations (types and number of locomotives) based on information received from PS&P. The updated analysis predicts lower emissions than those presented in the Draft EIS; the level of increased risk is not considered significant. Therefore, no mitigation is proposed.

Comment T8-105

16.0 SEISMIC HAZARDS

This is another area where the DEIS, even with flaws in its analysis discussed below, finds the risk of an oil spill cannot be fully mitigated and if a spill occurred, the environmental damage would be significant. Westway DEIS at S-37.

The Cascadia Subduction Zone, where the eastward-moving Juan de Fuca tectonic plate plunges beneath the westward-moving North American plate close to the Oregon coast *[Footnote: Oregon Department of Land Conservation and Development, Oregon Coastal Zone Management Program Tsunami Guide, http://www.oregon.gov/LCD/OCMP/docs/Publications/TsunamiGuide20140108.pdf (April 2014).]*, creates a severe hazard for earthquakes of magnitude 9.0 or even higher. *[Footnote: Goldfinger, Christopher et al., Turbidite Event History—Methods and Implications for Holocene Paleoseismicity of the Cascadia Subduction Zone, U.S. Geological Survey Professional Paper 1661-F, http://pubs.usgs.gov/pp/pp1661f/, (2014).]* Experts estimate the recurrence time for earthquakes in the southern region of the Cascadia Subduction Zone, comprising Northern California and the Oregon coast, at 240 years over a period of 10,000 years. *[Footnote: Id. at 3.]* Because the last event occurred in 1700, experts estimate the likelihood of a severe seismic event within a reasonable 50 year lifetime of the facility at up to 42%. *[Footnote: Id. By the year 2060, within the lifetime of the proposed facilities, the southern portion of the Cascade Subduction Zone will have exceeded 85% of recurrence intervals if no major earthquake has yet occurred.]*

Additionally, since the subduction zone is located offshore, a tsunami of devastating proportions would follow. Experts predict a tsunami similar to the tsunami that inundated Japan's coast immediately following the 2011 Tohoku magnitude 9.0 megathrust earthquake. *[Footnote: Oregon Department of Land Conservation and Development, Oregon Coastal Zone Management Program Tsunami Guide at 5-6.]* The tsunami wave height at Fukushima crested at 49 feet *[Footnote: Charles B. Miller, Notes on Potential Effects of a Subduction Earthquake and Tsunami Sequence on a Jordan Cove LNG Terminal at 9. http://350corvallis.org/wpcontent/uploads/2013/01/LNG-in-Tsunami-Zone_all.pdf.]*, consistent with early modeling studies showing that offshore mega-earthquakes in the Pacific U.S. region can trigger tsunamis with wave heights of 30 to 70 feet. *[Footnote: Dr. Hal Mofjeld, NOAA Center for Tsunami Research. Pacific Marine Environmental Laboratory, http://nctr.pmel.noaa.gov/faq_display.php?kw=1998%20Interview%20with%20Dr.%20Hal%20Mofjeld#9.]* In Tohoku, the wave surged inland to a distance equivalent to 128 feet above sea level, traveled up to 6 miles inland, and killed over 15,000 people. *[Footnote: Becky Oskin, Japan Earthquake and Tsunami of 2011: Facts and Information, http://www.livescience.com/39110-japan-2011-earthquake-tsunami-facts.html.]* This is the context in which Westway and Imperium propose to construct their terminals.

Response T8-105

Draft EIS Chapter 3, Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards*, describes potential impacts related to earthquakes and earthquake-related effects (e.g., liquefaction, tsunamis) and the existing requirements that would reduce these potential impacts. Section 3.1.7.1,

Applicant Mitigation, identifies measures that would further reduce these potential impacts. Refer to the Master Response for Seismic Risk and Design Requirements. Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

Comment T8-106

Adding to this risk, Westway and Imperium's proposals sit on soils (and fill) that are highly susceptible to liquefaction. Liquefaction is a soil behavior phenomenon in which saturated soil softens and loses strength during strong earthquake ground shaking and ultimately flows like a liquid. The Washington State Department of Natural Resources has designated the Port of Grays Harbor and the surrounding area as a zone of high liquefaction hazard. *[Footnote: Earthquake-induced landslide and liquefaction susceptibility and initiation potential maps for tsunami inundation zones in Aberdeen, Hoquiam, and Cosmopolis, Grays Harbor County, Washington, for a M9+ Cascadia subduction zone event, (2013) by S. L. Slaughter et al. Wash. State Dept. of Nat. Res. Invest. 36.].*

Response T8-106

Refer to the Master Response for Seismic Risk and Design Requirements for information about how issues concerning liquefaction were addressed in the Draft EIS.

Comment T8-107

As explained in the accompanying expert report of Dr. Joseph Wartman (Exh. 4), the DEIS "largely focuses on earthquake potential and associated secondary seismic effects including strong ground shaking, soil liquefaction, coseismal tectonic subsidence, and tsunamis" and finds that "over a 50-year period (i.e., the typical design life of an engineered facility), there is a 2% chance that an earthquake will cause ground shaking . . . expected to result in moderate to heavy structural damage to the facility."

> Dr. Wartman points out, however, that the DEISs fail to discuss "the more likely case of moderate shaking . . . which can likewise cause significant structural damage to port facilities (there is about a 10% chance of PGA exceeding 0.3g during a 50-year design life of the facility.) [Footnote: USGS Seismic Hazard Curve Application, http://geohazards.usgs.gov/hazardtool/application.php.] For example, during the 1995 Great Hanshin, Japan earthquake, local ground shaking of PGA = 0.31g caused major damage to the port of Kobe, a modern industrial harbor facility. Included among the many effects at the port of this earthquake were damage to quay walls, breakwaters, pile-supported structures, and industrial equipment such as large cranes." [Footnote: Werner, S. and Dickenson, S. (1996) Hyogo-Ken *Nanbu Earthquake of January 17, 1995: A Post-Earthquake Reconnaissance of Port Facilities, ASCE* Press.*]*

Response T8-107

The Draft EIS considers the impacts related to a large earthquake, and smaller events are considered by inclusion in the larger and more intense seismic events. Refer to the Master Response for Earthquake Probabilities.

Comment T8-108

Dr. Wartman's report addresses earthquake-associated tsunami risks, finding that the DEISs themselves show that the earthen berm proposed as mitigation could be overtopped by tsunami

waves. For landslide hazards, the DEIS considers precipitation-caused landslides, but not landslides accompanying a seismic event. Wartman Report at 3 ("The DEISs do not recognize that even moderate magnitude earthquakes (i.e., Magnitude 5 and above) are capable of simultaneously triggering many coseismic landslides across wide region.") *[Footnote: Keefer (1984) Landslides caused by earthquakes, Bull. of the Geol. Soc. of America.]* Mitigation measures for these risks are either inadequate or inadequately disclosed. "Nevertheless, no mitigation measures are capable of fully mitigating the geologic hazards and associated risks posed to the facilities." Wartman Report at 4.

Dr. Wartman concludes:

> While I also agree that potentially high levels of ground shaking (PGA of 0.7g or greater) may result in heavy damage to the facility, I believe that the more likely case of even lower intensity earthquake motions (PGA = 0.3g or greater) may cause significant damage. In addition to strong ground shaking, secondary earthquake hazards such as soil liquefaction, subsidence, and tsunamis pose significant threats to the facility that may result in release of hazardous materials, among other adverse consequences. Wartman Report at 4.

Response T8-108

The proposed facility would have spill containment that surrounds the area of the storage tanks. This spill containment is not considered a berm for tsunami waves. The natural topography of the site is slightly higher near the shoreline. However, this higher ground is not a constructed berm. An earthen berm is mentioned as a potential improvement to reduce the risk of tsunami at the project site in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis.* However, the adjacent parcels and community do not intend to raise the entire length of shoreline to create a contiguous line of high elevation to reduce the potential of overtopping by tsunami. As standalone mitigation at the project site, this is not a practicable measure.

Comment T8-109

The recent effects of the January 2015 storm are a good example of landslide and slope instability issues that affect Grays Harbor. Storm events are expected to increase in frequency and intensity due to climate change. (Mantua, 2015; Sandell & McAninch, 2013). These hazards should be fully analyzed and mitigation measures provided in order for the DEISs to be complete.

The DEISs use WSDOT data but fail to use DNR's Statewide Landslide database. For a complete environmental analysis, the proponents must implement the Department of Natural resources recommendations (see Comment 000000339-3, Appendix A) and consult with DNR scientists to ensure the correct methodology is implemented for all aspects of the project (operations, construction, rail, and vessel).

Response T8-109

Draft EIS Chapter 3, Section 3.1, *Earth*, evaluates the potential for impacts related to landslides, based on review of the Washington Department of Natural Resources shallow landslide database (Washington Department of Natural Resources 2014b as cited in the Draft EIS) at the project site and the WSDOT Unstable Slope Management Program (Washington State Department of Transportation 2010 as cited in the Draft EIS) along the PS&P rail line. As noted in Section 3.1, the proposed action would not result in any ground disturbance or changes in topography that would increase the potential for landslides. Increased rail traffic to and from the project site has the

potential to increase the risk of exposure to a landslide. As noted in Section 3.1, risks related to rail incidents are addressed in Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*. For more information about how the potential for natural hazards were considered in the risk assessment, refer to the Master Response for Risk Assessment Methods.

Comment T8-110

The rail analysis also contains incorrect data. For example the DEISs attempt to calculate the likelihood that an unstable slope event could hit or derail a train. The DEISs claim "*Specifically, operation of the proposed action at maximum throughput would result in approximately one unit train trip per day, on average, along the PS&P rail line, compared to an average of three train trips per day under the no-action alternative*." Westway DEIS at p. 3.1-21. This is an inaccurate statement. The DEISs do not include the additional train trip per day for a total of four daily train trips that should be analyzed under this action alternative. Therefore, the earthquake and related hazards need to be reassessed and the quantitative methodology needs to be included in the DEISs.

Response T8-110

As noted in Draft EIS Chapter 2, *Proposed Action and Alternatives*, the proposed action is likely to result in approximately 1.25 trips each day to or from the project site. These trips would be in addition to existing baseline traffic, which was determined to be three train trips per day. The analysis is Section 3.1, *Air*, qualitatively asserts that the increase in the potential for rail conflicts involving a landslide would be minimal and proportional to the increase in the number of trains. As further noted in Section 3.1, the increased risk or an incident on the PS&P rail line involving the release of crude oil considered the possibility of landslides.

Comment T8-111

The Westway DEIS claims ''prior to receiving the final building permits, the applicant would need to ensure the geotechnical evaluation considered the most current applicable information and standards." Westway DEIS at p. 3.1-19. The full potential effects of geologic hazards cannot be fully analyzed without the geo-technical report and structural design included in the DEIS.

Response T8-111

Earthquake risk assessment and design are iterative and ongoing processes during which varying levels of investigation and analysis are performed to identify and address the potential impacts associated with a project commensurate with its stage in development. Implementation of measures identified during investigations specific to the proposed action and any others identified during subsequent investigations would be required to adequately reduce the risks of the proposed action. Refer to the Master Response for Seismic Risk and Design Requirements.

Comment T8-112

17.0 ECONOMIC IMPACTS

Issues that generate economic questions include the impacts of dramatic increases in oil train traffic on real estate values and damage to property from diesel emissions, vibration, and noise. There are also serious concerns relating to the impact of such a massive increase in oil rail traffic on other non-oil shippers of freight by rail, including shippers of agricultural products. These same issues may

dramatically affect passenger rail interests. These significant rail traffic increases are likely to create major impacts on communities affected by vehicle traffic problems related to delays at non-grade separated railway crossings, which will affect non-rail freight mobility, access to ports, retailers, tourist centers, and employers. In short, however, due to the truncated scope of review and inadequacies discussed below, the DEISs fail to adequately analyze economic impacts.

Resource Dimensions conducted an independent review of the DEISs "to assess the quality and credibility of the DEIS decision documents." Resource Dimensions, Exhibit 3, at 4. See review at Exhibit 3 for details, but in sum, the major flaws of the DEISs' economic review are:

1. DEISs fail to include a cumulative impact analysis as a component of the economic impact analysis.
2. Limited scope of economic impact analysis creates a misleading picture of total economic impacts.
3. Limited usefulness of the cost-benefit analysis conducted.
4. Failure to employ appropriate methods to determine monetary or quantitative estimates for certain impacts.
5. No attempt to quantify economic impacts or negative externalities of an oil spill.
6. DEISs fail to adequately address impacts of proposed projects on the Quinault's use of treaty resources.
7. Numerous inconsistencies, omissions, and errors.
8. Several erroneous conclusions are drawn about impacts on tribal resources and low income and minority populations.
9. Limited usefulness of discussion of climate change.

Response T8-112

Refer to responses to detailed comments on Exhibit 1, Resource Dimensions, beginning at Comment T8-219.

Comment T8-113

18.0 GREENHOUSE GAS EMISSIONS

The GHG analysis contained in the DEISs is flawed in at least three respects. First, the DEISs failed to consider the rail emissions that will occur between North Dakota and the Washington border. Second, the DEISs fail to give a complete picture and accurate analysis of the lifecycle GHG impacts from extracting and burning the oil related to these projects. And lastly, the DEISs offer no effective mitigation, ignore possible mitigation, and do not acknowledge the resulting unavoidable and significant adverse environmental impacts.

18.1 SEPA STANDARDS FOR GHG EMISSIONS REVIEW

SEPA and its implementing regulations explicitly require consideration of direct and indirect climate impacts. See RCW 43.21C.030(f) (directing agencies to "recognize the world-wide and long-range character of environmental problem); WAC 197-11-444 (listing "climate" among elements of the environment that must be considered in SEPA review). SEPA regulations also explicitly direct that

environmental impacts outside the jurisdiction of the deciding agency should be considered. WAC 197-11-060(c). Crucially, agencies are required to assess both the direct and indirect impacts of the proposal.

In 2008, a governor-appointed working group provided a list of recommendations on how to ensure that climate change is considered in meeting SEPA's directives. *[Footnote: Available at http://www.ecy.wa.gov/climatechange/docs/sepa/20110603_SEPA_GHGinternalguidance.pdf.]* Notably, those recommendations identified the following categories of greenhouse gas ("GHG") emissions to be considered pursuant to SEPA: a) off-site mining of materials purchased for the project; b) transportation of raw materials to the project, and transport of the final product offsite; c) use of products sold by proponent to consumers or industry, including "emissions generated from combustion of fuels manufactured or distributed by the facility." Id. at App. D.

Ecology has issued SEPA Guidance for its own consideration of GHG emissions. *[Footnote: Available at http://www.ecy.wa.gov/climatechange/sepa.htm.]* Accordingly, the Guidance makes clear that SEPA requires climate to be considered in its environmental analysis. Ecology's Guidance proposes that SEPA documents consider whether the proposal will significantly contribute to GHG concentrations, and states that "[i]f the emissions are proximately caused by the project, they should be disclosed regardless of their location." *Id.* at 4. The Guidance proposes that projects qualitatively disclose GHG emissions of at least 10,000 metric tons/year and quantitatively disclose GHG emissions for projects expected to produce an average of 25,000 tons/year of carbon dioxide equivalent.

Ecology has also provided a ''table of tools" that can be used to calculate emissions from projects. *[Footnote: Available at http://www.ecy.wa.gov/climatechange/sepa.htm.]* That Table, in tum, lists various sources of emissions from projects, methods to calculate those emissions, and options to mitigate them. Direct "Scope 1" emissions include trains and boats. *Id.* at 1. Scope 3 emissions include "emissions from the future combustion of fossil fuels," which are defined to include "emissions that will result from the combustion of fossil fuels transported, distributed or imported as a result of the project (e.g., natural gas pipeline)." *Id.* at 2.

18.2 DIRECT GHG EMISSIONS

The DEISs' discussion of climate change is of limited usefulness. The Department of Ecology's Guidance on climate change analysis in SEPA documents includes the following statement: "*For projects with ongoing operations that include transporting products from outside the state, such as a port, a more thorough and perhaps more defensible analysis would include the transportation emissions from the source location outside of Washington to the final destination if either is known and the extent to which either is known*." *[Footnote: DOE. 2011. Guidance for Ecology Including Greenhouse Gas Emissions in SEPA Reviews. Accessed September 1, 2015. Available at http://www.ecy.wa.gov/climatechange/docs/sepa/20110603_SEPA_GHGinternalguidance.pdf.]* The DEISs include a limited discussion of the proposed projects' impact on climate change that certainly does not meet the above criteria for a defensible analysis. Under Ecology's own Guidance, the climate change discussion is not defensible because it does not include analysis of total greenhouse gas emissions from crude oil sources to receiving ports and refineries.

The DEISs only analyzed rail GHG emissions from Spokane to Grays Harbor (rather than the source of the fuel in North Dakota or Alberta). See Westway DEIS at 3.2-19; Imperium DEIS at 3.2-20. SEPA requires an analysis of all GHG emissions, even those that would occur outside Washington State. This is a serious shortcoming since the DEISs acknowledge that rail emissions - even considering

only emissions that would occur in Washington State-would be the biggest direct driver of direct emissions. Westway DEIS at 3.2-18; Imperium DEIS at 3.2-19. The rail emissions that would occur in Washington alone if all three projects go forward are 77,887 metric tons of CO2 per year. Westway DEIS at 6-11; Imperium DEIS at 6-11. That would be a 7.79% increase in state rail emissions. *Id.* Given the distance from North Dakota to the Washington border, total rail emissions likely more than double that amount, but the DEISs have not disclosed that information.

Permitting of these projects is the decision point that could allow these projects and, therefore their direct emissions, whether they occur in Washington, Montana, North Dakota, or somewhere else. C02 is fungible in the atmosphere such that the impacts to Washington State and the rest of the world do not depend on where the emissions occur. For that reason, it is not acceptable to consider emissions from these projects compared to global emissions, while only considering a sliver of the total rail emissions. Westway DEIS at 3.2-19; Imperium DEIS at 3.2-20.

Similarly, the DEISs do not analyze greenhouse gas emissions from ocean transport to refinery, instead stopping the analysis at the edge of Washington's ocean waters. The DEISs fail to review and analyze the entire extent of the proposals' greenhouse gas emissions.

Finally, the DEISs state "*The largest contribution of GHG emissions would result from rail transport and represents an increase of approximately 7.8% in the statewide rail emissions of GHGs. Overall GHG emissions related to operation of the proposed action represent about a 0.11% increase in statewide GHG emissions*." Westway and Imperium DEISs at p. 6-10. The conclusion that a 0.11% statewide increase in GHG emissions is insignificant is unsupported and unsupportable-this is a significant contribution to the State's entire GHG level for only two projects. Also, DEIS summaries state the following: "Greenhouse gas emissions from the cumulative projects contribute to climate change at the global level." Westway and Imperium DEISs at p. S-27. This is a quote from the DEIS, but no significant impacts are discussed in Chapter 6, Cumulative Impacts.

18.3 INDIRECT GHG EMISSIONS

The DEISs must do a full analysis of the lifecycle emissions of these projects. *[Footnote: A lifecycle "well-to-wheel" GHG analysis was performed for the Keystone XL pipeline and could be used as a model. See Exh. 32, Appendix U to Keystone XL EIS, Lifecycle Greenhouse Gas Emissions of Petroleum Products from WCSB Oil Sands Crudes Compared with Reference Crudes, available at http://keystonepipeline-xl.state.gov/documents/organization/221247.pdf.]* While the DEISs state that much of the oil received by rail will replace other domestic oil at U.S. refineries (presumably oil received by marine vessel), Westway DEIS at 6-13; Imperium DEIS at 6-13, the DEISs lack any analysis to support that claim. Absent such support, the DEISs must assess potential increases in GHGs associated with increased production or export of crude oil.

The DEISs fail to provide anything other than speculation as to whether these projects would mean more crude oil would be extracted and burned. In conclusory fashion, the DEISs state that "the cumulative projects would not likely affect the crude oil market." Westway DEIS at 6-14; Imperium DEIS at 6-14. These projects alone would move 1.2% of the U.S. daily crude oil supply. *Id.* That is a far from trivial amount of oil. All markets are made up of smaller individual actors, all of which affect supply and demand. The DEISs' speculation to the contrary ignores basic economic principles. The construction of these projects makes available a new source of oil to West Coast refineries via a new transportation method; these effects and their attendant results on the oil market and possible additive emissions cannot be ignored.

The picture is far more complicated than the DEISs reveal, as these projects and projects like them are indeed expected to result in increased tar sands production, increased fracking of Bakken oil, and increased overall GHG emissions. *[Footnote: See Exh. 33, Oil Change International and Sightline Institute, Tracking Emissions: The Climate Impact of the Proposed Crude-By-Rail Terminals in the Pacific Northwest at 1-2 (Nov. 2015) ("Tracking Emissions Report").]* The DEISs failed to consider the GHG cumulative impacts of other, nearly identical, crude-by-rail projects proposed in the Pacific Northwest (both direct and indirect emissions). The cumulative impact of the U.S. Development project is considered, but not the others, which will cumulatively result in quadruple the current crude-by-rail capacity in the region. Tracking Emissions Report at 8, 13. Pacific Northwest crude-by-rail projects could make tar sands projects commercially viable that otherwise would not be, resulting in increased extraction and burning of that crude. Tracking Emissions Report at 30-32. Crude-by-rail terminals, including Westway's and Imperium's, would also increase capacity to handle Bakken, and therefore, and could enable increased Bakken production. *Id.* At 38. The bottom line is that Pacific Northwest crude-by-rail terminals could mean unlocking new crude resources and would result in 41-168 additive metric tons of CO2 emitted each year. *Id.* at 39.

Moreover, the lifecycle GHG impacts of various sources of crude are not the same. For example, lifecycle emissions of Bakken fracked light oil are likely to be higher than Alaskan or Canadian crude due to methane emissions during the process of obtaining the crude, and significant GHG profile of transporting the crude long distances. *[Footnote: See Exh. 31, Carnegie Endowment, Global Coal-Oil Index (Mar. 2015), available at http://carnegieendowment.org/2015/03/11/know-your-oil-creating-global-oil-climate-index); see also Exh. 34, Schneising et al., Remote sensing of fugitive methane emissions from oil and gas production in North American tight geologic formations, Earth's Future (2014)), available at http://acmg.seas.harvard.edu/publications/aqast/articles/schneising2014.pdf).]* Lifecycle emissions of tar sands oil are well known to be significantly higher than conventional crudes due to the high energy costs required to extract the crude and the way it combusts, and it is not clear if this is taken into consideration in Table 3.2-9. Unless tar sands bitumen is prohibited, the full lifecycle emissions of transporting it by rail to the refinery should be fully disclosed and analyzed. The costs of these additional GHG emissions should also be disclosed using tools like the federal government's "social cost of carbon" metric. *[Footnote: http://www3.epa.gov/climatechange/EPAactivities/economics/scc.html.]*

18.4 THE PROPOSED MITIGATION IS INADEQUATE, AND THESE PROJECTS WOULD RESULT IN UNAVOIDABLE AND SIGNIFICANT ADVERSE ENVIRONMENTAL IMPACTS.

The direct GHG impacts of these projects alone, even with the flaws described above, will be 0.11% increase in statewide emissions. Westway DEIS at 6-11. The DEISs do not propose any mitigation for GHG emissions other than requiring Westway and Imperium to submit vehicles for routine maintenance and to minimize idling. Westway DEIS at 6-17 to -18; Imperium DEIS at 6-17 to -18. The idling mitigation requirement is independently inadequate because it does not provide substantive requirements, only urging that some plan be created, but the combination of these mitigation measures is laughably inadequate in light of the tremendous impacts these projects will have.

All GHGs should be mitigated, and the final EISs must consider various mitigation options beyond the idling and maintenance measures proposed in the DEISs. Idling is only a small fraction of the GHG emissions these projects would directly release. Mitigation options must include: denial of the project outright; prohibition on high-GHG sources like tar sands; and requirement to purchase credits from a legitimate and verified source to offset all net GHG emissions on an annual basis,

including lifecycle well-to-wheel emissions that are proximately caused by the project. These projects would be responsible for a tremendous increase in GHG emissions, and without mitigation, these emissions create unavoidable and significant adverse environmental impacts.

Response T8-113

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport in Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively. The Final EIS reflects greenhouse gas emission estimates from offsite transport from the likely source of crude oil to the furthest likely refinery destination, based on the crude oil market analysis, presented in Final EIS Appendix Q. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for more information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Based on the crude market analysis, the proposed action is not likely to affect oil production; therefore, greenhouse gas emissions related to extraction activities are not quantified in the EIS.

Comment T8-114

19.0 ENVIRONMENTAL JUSTICE

The DEISs show that the Westway and Imperium projects will have a disproportionate impact on people of color and low-income communities. This includes impacts on the Quinault Indian Nation and its members, as well as significant adverse impacts to other communities largely made up of low-income individuals and members of racial and ethnic minority groups. While the DEISs acknowledge many harms to communities surrounding the projects and along the rail-routes, they have failed to address that these harms will be disproportionately borne by those communities, an outcome unacceptable under state and federal law. Likewise, despite these serious impacts to individuals and communities, the DEISs erroneously rely on a finding that there will not be significant adverse impacts, Westway DEIS at 7-25 *[Footnote: As discussed above, this finding is not accurate for a number of impacts.];* but that is not the standard for environmental justice impacts- any impact, whether found to be significant or not, must not be inflicted so as to have a racially disproportionate impact. The disproportionate impacts of these harms is another reason the Westway and Imperium projects should be denied in their entirety. [Photo Cropped from Westway DEIS at 3.9-13; photo reviewed but not reproduced.]

19.1 DISPROPORTIONATE AND ADVERSE IMPACTS ARE ILLEGAL.

A number of laws prohibit disproportionate impacts from falling on communities of color and low-income communities. For example, the 1994 Environmental Justice Executive Order requires federal agencies to ensure that its actions do not have disproportionate impacts on low-income and/or minority populations. Exec. Order No. 12,898, 59 Fed. Reg. 7,629 (Feb. 11, 1994). In Washington State, Ecology has an agreement with EPA to effectuate environmental justice in the state. Environmental Performance Partnership Agreement, Washington State Department of Ecology and U.S. Environmental Protection Agency at 12-15 (rev. July 2015).

Importantly, disproportionate and adverse impacts are also prohibited by Title VI of the Civil Rights Act and EPA's implementing regulations. EPA's regulations prohibit disproportionate impact from

environmental banns. 40 C.F.R. § 7.35. If a disproportionate and adverse impact occurs, EPA may withhold federal funds from the state authorizing the activity, here Ecology. *Id.* at § 7.130(a).

Response T8-114

In accordance with the SEPA Rules (WAC 197-11-402), the Draft EIS focuses on those probable adverse environmental impacts that are significant.

Comment T8-115

19.2 MINORITY AND LOW-INCOME COMMUNITIES LIVE IN THE AREAS THAT WOULD BE AFFECTED.

The DEISs looked at block groups that will be affected by the projects and found that 31 of 57 have minority populations exceeding their counties'. Westway DEIS at 7-15; Imperium DEIS at 7-15. This trend is true immediately surrounding the project areas and along almost the entire length of the rail servicing the projects. Westway DEIS at 7-16; Imperium DEIS at 7-16. The three census block groups and 72% of the block groups along the rail corridor have minority population percentages above their counties. *Id.* The one-mile radius around the projects has a minority population percentage of31%, see Exh. 41, EJScreen ACS Summary Report, but the area immediately surrounding the proposed projects have minority population percentages up to

46%. *See* Exh. 42, EJScreen Blockgroup Data Combined. *[Footnote: The DEISs use language that devalues the communities assessed by the environmental justice and broader analysis, systematically referring to people as "receptors." That term—regardless of its pervasive use—does not give full humanity and respect to the people, families, and communities who will be harmed by these projects. Likewise, the DEISs say that minority and low-income populations "occur" in certain areas, Westway DEIS at 7-16; this is another dehumanizing characterization of individuals and communities—people live in or reside in areas and undertake many other activities.]* As the DEISs found, the "minority and low-income populations in the Census block groups near the project site are much higher'' than for the county as a whole. Westway DEIS at 7-25; Imperium DEIS at 7-25. Similar percentages of minority populations are found along much of the rail corridor. Westway DEIS at 7-16; Imperium DEIS at 7-18.

The county-wide poverty rate in Grays Harbor is 20%, yet that figure is exceeded in the areas that will be most affected by the proposed projects. Westway DEIS at 7-2; Imperium DEIS at 7-2. The DEISs also note that 25 of the 57 census block groups assessed have low-income populations exceeding their county levels. Westway DEIS at 7-15; Imperium DEIS at 7-15. The block groups immediately surrounding the projects have poverty percentages up to 48%. Exh. 42; EJScreen Blockgroup Data Combined.

Response T8-115

Comment acknowledged.

Comment T8-116

The area immediately surrounding the project is already a hotspot for environmental impacts, which will be compounded if these projects are allowed to go forward. For example, the communities surrounding the project sites already are in the 73rd percentile statewide for

particulate matter and 74th percentile for ozone. They are also in the 87th percentile for proximity to major water dischargers and in the 80th percentile for traffic proximity volume. See Exh. 43, EJScreen Report.

19.3 THESE PROJECTS WOULD CAUSE MAJOR AND DISPROPORTIONATE IMPACTS TO COMMUNITIES OF COLOR AND LOW-INCOME COMMUNITIES.

Essentially all of the impacts from these two crude-by-rail projects would fall disproportionately on low-income communities and communities of color. Yet the DEISs proceed from the false starting point that only impacts rising individually to a significant adversity level are of concern. Westway DEIS at S-31; Imperium DEIS at S-31 ("Routine onsite operations are not anticipated to result in significant environmental impacts and would, therefore, not be expected to disproportionately affect minority and low-income populations."); Westway DEIS at 7-25; Imperium DEIS at 7-25 ("However, as noted above, potential impacts from routine onsite operations are not anticipated to result in significant environmental impacts and would therefore, not be expected to significantly adversely affect minority and low-income populations around the project site."). Effects to be avoided, however, include all impacts with disproportionate impacts, and allowing impacts to proceed that fall largely on low-income and minority groups is unacceptable. Ecology and Hoquiam are obligated to prevent exactly these sorts of disproportionate impacts.

Response T8-116

In accordance with the SEPA Rules (WAC 197-11-402), the Draft EIS focuses on those probable adverse environmental impacts that are significant.

Comment T8-117

The DEISs do acknowledge, however, that minority and low-income populations will be disproportionately affected by numerous impacts including noise, air emissions, delay, and increased exposure to risks of spills, fires, and explosions. Westway DEIS at S-32; Imperium DEIS at S-32.

The DEISs acknowledge that there will be harmful air emissions resulting from the Westway and Imperium projects. For example, concentrations of NO2 could exceed the 1-hour NO_2 standard when all three projects are considered. Westway DEIS at 6-7; Imperium DEIS at 6-7. The communities that immediately surround these projects would bear the primary burden of these impacts, and even in the absence of violations of the 1-hour standard, the same communities will endure the routine emissions. The DEISs also acknowledge that portions of residential areas will fall within the 10-per-million risk for cancer area for particulate matter. Westway DEIS at 6-9 to -10; Imperium DEIS at 6-9 to -10. As described above, these neighborhoods surrounding the project site-those that would be significantly and adversely affected by cancer-causing particulate matter-have higher minority population percentages.

[Photo of Cancer risk overlay cropped from Westway DEIS at 6-9; reviewed but not reproduced.]

Response T8-117

Draft EIS Chapter 3, Section 3.2, *Air*, identifies the impacts to air quality and health risk assessment. The National Ambient Air Quality Standards (NAAQS) have been developed by the U.S. Environmental Protection Agency (EPA) for widely emitted air pollutants to protect the health of the

most susceptible populations. Section 3.2 shows that no violation of the NAAQS would occur during operation of the proposed action. Section 3.2 also addresses the potential impacts of volatile compounds, such as benzene, and identifies that that no air toxic is above Washington State Department of Ecology's Acceptable Source Impact Level. Because of the concern with diesel emissions, which is primarily from locomotive emissions, and the potential for increased cancer risk, a diesel particulate matter cancer risk assessment was completed for the study.

The Final EIS air emissions and cancer risk analysis in Chapter 3, Section 3.2.5.2, *Proposed Action*, reflects revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. These changes result in lower diesel particulate matter emission rates and result in a lower cancer risk. The incremental increase in cancer risk from air quality impacts would be less than 10 in 1 million for any off-site receptor. This level of increased risk is not considered significant.

To provide perspective, the most recent EPA National Air Toxic Assessment[21] based on 2012 air emissions has the statewide average air toxic cancer risk at 43 per million and Grays Harbor County at 20 per million. However, EPA excludes diesel particulate matter from cancer risk analysis because there is too much uncertainty about the cancer potency value to assign a numerical value for diesel particulate matter. If diesel particulate matter is responsible for cancer risk similar that found in Puget Sound by the Puget Sound Clean Air Agency and contributes 78% of the additional cancer risk, then a one-in-a-million increase from the proposed action would represent about a 1% increase over current air toxic risk levels.

Comment T8-118

Other impacts from the proposed projects would also have a disproportionate impact on minority and low-income communities. For example, the noise impacts from the increased rail transportation will affect people living near the site, along with the people living along the rail routes. The DEISs acknowledge that 31 of 43 census block groups along the rail route are considered minority and/or low-income populations. Westway DEIS at 7-26 to -27; Imperium DEIS at 7-26 to -27 ("it is possible that minority and low-income populations closest to the rail line could be disproportionately affected by increases in noise depending on the proximity of noise-sensitive receptors (residents) to the line"). The DEISs go on to acknowledge that this will result in disproportionate impacts but do not propose any additional ways to mitigate that harm or discuss how the disproportionate nature of these impacts will be addressed. The same is evident for traffic impacts, which are also expected to have a disproportionate and negative effect on the populations living closest to the project site. Westway DEIS at 7-26 to -27; Imperium DEIS at 7-27 ("These impacts could disproportionately affect minority and low-income populations in communities immediately surrounding the affected areas.").

Response T8-118

Mitigation proposed for impacts related to noise and vehicle delay in Final EIS Chapter 3, Sections 3.7, *Noise and Vibration*, and 3.16, *Vehicle Traffic and Safety*, respectively, would apply to impacts experienced by low-income and minority communities.

[21] U.S. Environmental Protection Agency. 2011. 2011 NATA: Assessment Resulted. Updated in December 2015. Available: https://www.epa.gov/national-air-toxics-assessment/2011-nata-assessment-results.

Comment T8-119

As far as vessel impacts, the DEISs contain two stunning (but accurate) admissions: 1) vessel-related impacts would disproportionately harm low-income and minority people, and 2) would conflict with tribal access to fishing areas, have environmental health and safety impacts, and would occur with some frequency. Westway DEIS at 7-27; Imperium DEIS at 7-27. *[Footnote: The DEISs apparently attempt to downplay these impacts by stating that "While any impacts would disproportionately affect minority and low-income populations, as stated previously, vessel-related impacts are anticipated to be relatively low with two exceptions: the potential for conflicts with tribal access to usual and accustomed fishing areas and the potential for environmental health and safety impacts." Westway DEIS at 7-27; Imperium DEIS at 7-27. But these impacts are tremendous, and, as the DEISs note, significant and unavoidable.]* As the DEISs concede, these routine and expected impacts "would be unavoidable and significant.'' *Id.* This, of course, is impact additional to the threat of catastrophic spills, which could devastate the Quinault Indian Nation's fisheries and way of life or harm the communities surrounding the site. Westway DEIS at 7-26; Imperium DEIS at 7-26 ("Any large releases with the potential to enter the harbor from the project site could also disproportionately affect minority and low-income populations in these areas."). A careful look at the risk assessment shows that these are not idle concerns. See Westway DEIS at 6-53, -55; Imperium DEIS at 6-53, -55 ("The chance of a collision or derailment resulting in a loss equivalent to one rail car is predicted to be once in 11 years…. An extreme grounding resulting in the loss of the entire contents of vessel could occur every 128 years."). As discussed above, the aggregate marine spill risk is 44% each year.

Rather than address these disparate impacts through further mitigation, the DEISs do little more than point to the mitigation already planned as adequate. Westway DEIS at 7-27 to- 28; Imperium DEIS at 7-28. The DEISs discuss appointing community and tribal liaisons, but there is no indication that those liaisons would have the authority to actually minimize or reduce impacts. These projects would violate civil rights and other laws because of these disproportionate impacts that are acknowledged to be unavoidable, and on that basis alone they should be denied.

Response T8-119

Potential impacts of construction and routine operation of the proposed action on tribes are addressed in Chapter 3, Section 3.12, *Tribal Resources*. Potential impacts related to the risk of spills, fires, and explosions are addressed in Chapter 4, *Environmental Health and Safety*.

Comment T8-120

20.0 THE DEIS FINDS SIGNIFICANT IMPACTS THAT CANNOT BE MITIGATED.

20.1 SUBSTANTIVE SEPA REQUIREMENTS

SEPA is more than a purely "procedural" statute that encourages informed and politically accountable decision-making. In enacting SEPA, the state legislature gave decision-makers the affirmative authority to condition or even deny projects where environmental impacts are serious, cannot be mitigated, or collide with local rules or policies. This authority, like all government authority, is not boundless: the denial of a project must be made on the basis of policies adopted by the relevant government body in light of significant adverse impacts that cannot be reasonably mitigated. This authority has been exercised relatively sparingly. Indeed, in some cases, decision-makers are unaware that they even have it, and incorrectly believe that as long as proposals comply

with all applicable development codes, then agencies have no choice but to approve the project. To the contrary, SEPA, in and of itself, contains the power to say no.

In adopting SEPA, the state legislature declared the protection of the environment to be a fundamental state priority. RCW 43.21C.010. SEPA declares that "[t]he legislature recognizes that each person has a fundamental and inalienable right to a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment." RCW 43.21C.020(3). This policy statement, stronger than a similar statement under the National Environmental Policy Act ("NEPA''), "indicates the basic importance of environmental concerns to the people of the state." Leschi v. Highway Comm'n, 84 Wn.2d 271, 279-80 (Wn. 1974). At the heart of SEPA is a requirement to fully analyze the environmental impact of government decisions that have a significant impact on the environment. RCW 43.21C.031(1). Under SEPA, a full environmental impact statement ("EIS") is required for any action that has a significant effect on the quality of the environment. WAC 197-11-330. Significance means a ''reasonable likelihood of more than a moderate adverse impact on environmental quality." WAC 197-11-794.

Under SEPA's governing regulations, a SEPA document must fully evaluate all of the direct, indirect, and cumulative effects of projects. WAC 197-11-060(2)(c). While SEPA itself does not define direct, indirect, and cumulative impacts, NEPA does, and these definitions have been borrowed for use in interpreting SEPA. See *Quinault Indian Nation v. City of Hoquiam*, 2013 WL 6637401 (Shorelines Hearings Board, Dec. 9, 2013) (borrowing NEPA definition of cumulative effects for SEPA analysis of crude-by-rail terminal). Indirect impacts are "caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable." 40 C.P.R. § 1508.8(b). Cumulative impacts include ''the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." 40 C.F.R. § 1508.7; WAC 197-11-060(4)(e) (requiring consideration of cumulative effects in determining whether significance threshold has been crossed); WAC 197-11-330(3)(c) ("Several marginal impacts when considered together may result in a significant adverse impact."). Also important in the context of fossil fuel transportation are impacts with a low likelihood but high consequences, like spills from rail or marine transportation. WAC 197-11-794 ("An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred.''). Importantly, the regulations specifically direct that an "agency shall not limit its consideration of a proposal's impacts only to those aspects within its jurisdiction, including local or state boundaries." WAC 197-11-060(4)(b). *[Footnote: Indeed, SEPA constitutes a ringing affirmation of the connectedness of Washington with the rest of the planet. It speaks of "humankind" and "human beings" rather than just citizens of this state. RCW 43.21C.010. SEPA explicitly calls on responsible agencies to "recognize the worldwide and long-range character of environmental problems" and take steps to cooperate in "anticipating and preventing a decline in the quality of the world environment." RCW 43.21C.030(f); Eastlake Comm. Coun. v. Roanoke Assoc., 82 Wn.2d 475, 487 (1973) (observing "unusually vigorous statement of legislature purpose . . . to consider the total environmental and ecological factors to their fullest in deciding major matters") (emphasis added). Those regulations also recognize that environmental impacts do not end at the state's borders, and explicitly require consideration of the impacts of projects outside of the state's jurisdiction. WAC 197-11-060(c); Cathcart-Maltby-Clearview Comm. Council v. Snohomish Cty., 96 Wn.2d 201, 209 (Wash. 1981) (SEPA "also mandates that extra-jurisdictional effects be addressed and mitigated, when possible.").]*

The requirement to study indirect impacts associated with oil terminals is equally clear under SEPA's federal analogue, NEPA. For example, in *Mid-States Coalition for Progress v. Surface Transp. Bd.*,345 F.3d 520 (8th Cir. 2003), the Eight Circuit Court of Appeals agreed that an EIS for a rail project was required to study the potential increased long-term demand for coal that could arise if the project was built. Similarly, in *Border Plant Working Group v. Department of Energy*, 260 F. Supp. 2d 997 (S.D. Cal. 2003), a court invalidated an EIS for power transmission lines because the decision-maker failed to consider the impacts of the operation of the Mexican power plants linked to the lines. *[Footnote: See also Ocean Advocates v. Corps of Engineers, 402 F.3d 846, 867-68 (9th Cir. 2005) (requiring EIS for dock construction project to consider "increased vessel traffic" that would be proximately caused by project); S. Fork Band Council of W. Shoshone v. DOI, 588 F.3d 718, 725 (9th Cir. 2009) ("The air quality impacts associated with transport and offsite processing of the five million tons of refractory ore are prime examples of indirect effects that NEPA requires to be considered.").]* Recent EISs for controversial projects like the Tongue River Railroad and the Keystone XL evaluate potential market impacts on fossil fuel production and consumption.

Moreover, the purpose of SEPA is not to generate the information for its own sake. Rather, the purpose of SEPA is to inform an underlying substantive decision; e.g., whether or not to grant some underlying permit or authorization to take action that potentially affects the environment. WAC 197-44-400. Accordingly, the information developed under SEPA on indirect and cumulative impacts of fossil fuel projects is intended to inform the ultimate permitting decision.

And on this point, SEPA is explicit. It provides substantive authority for government agencies to condition or even deny proposed actions-even where they meet all other requirements of the law-based on their environmental impacts. RCW 43.21C.060. As one treatise points out, when this premise was challenged by project proponents early in SEPA's history, ''the courts consistently and emphatically responded that even if the action previously had been ministerial, it became *environmentally discretionary* with the enactment of SEPA." Richard Settle, SEPA: A Legal and Policy Analysis (Dec. 2014) at §18.01[2] (emphasis added).

Courts have repeatedly recognized that this denial authority exists, even where projects otherwise comply with all relevant applicable codes. Indeed, the Washington Supreme Court explicitly affirmed that "under the State Environmental Policy Act of 1971 a municipality has the discretion to deny an application for a building permit because of adverse environmental impacts even if the application meets all other requirements and conditions for issuance." *West Main Associates v. Bellevue*, 106 Wn.2d 47, 53 (1986). An appeals court similarly affirmed that "counties therefore have authority under SEPA to condition or deny a land use action based on adverse environmental impacts even where the proposal complies with local zoning and building codes." Donwood v. Spokane County, 90 Wash. App. 389 (1998). Decision-makers have denied permits under this authority in a number of other contexts, many of which are similar to those of proposed crude oil terminals. [Footnote 80:]

The complete text of the applicable language is:

The policies and goals set forth in this chapter are supplementary to those set forth in existing authorizations of all branches of government of this state, including state agencies, municipal and public corporations, and counties. <u>Any governmental action may be conditioned or denied pursuant to this chapter</u>: PROVIDED, That such conditions or denials shall be based upon policies identified by the appropriate governmental authority and incorporated into regulations, plans, or codes which are formally designated by the agency (or appropriate legislative body, in the case of local government) as possible bases for the exercise of authority pursuant to this chapter. Such designation shall occur at the time specified by RCW 43.21C.120. Such action may be conditioned only to mitigate specific adverse

environmental impacts which are identified in the environmental documents prepared under this chapter. These conditions shall be stated in writing by the decision maker. Mitigation measures shall be reasonable and capable of being accomplished. In order to deny a proposal under this chapter, an agency must find that: (1) The proposal would result in significant adverse impacts identified in a final or supplemental environmental impact statement prepared under this chapter; and (2) reasonable mitigation measures are insufficient to mitigate the identified impact. Except for permits and variances issued pursuant to chapter 90.58 RCW, when such a governmental action, not requiring a legislative decision, is conditioned or denied by a nonelected official of a local governmental agency, the decision shall be appealable to the legislative authority of the acting local governmental agency unless that legislative authority formally eliminates such appeals. Such appeals shall be in accordance with procedures established for such appeals by the legislative authority of the acting local governmental agency.

RCW 43.21C.060 (emphasis added); *see also* WAC 197 197-11-030(1) ("The policies and goals set forth in SEPA are supplementary to existing agency authority."). This authority is amplified in Ecology's SEPA regulations, which lay out additional procedures and requirements for conditioning or denial pursuant to SEPA's substantive authority. WAC 197-11-660. For example, in order to deny a proposal under SEPA, an agency must find that "reasonable mitigation measures are insufficient to mitigate the identified impact." WAC 197-11-660(f)(ii).

In other words, communities that are reviewing proposed projects have the discretion to deny those projects, as long as: (a) the denial is based on an appropriate policy that is incorporated into local codes or rules; (b) the community finds that the project would result in significant adverse impacts; and (c) "reasonable mitigation measures" cannot mitigate those impacts. These criteria are likely to be scrutinized closely by the courts when entities use their substantive SEPA authority to deny a project. *[Footnote: Settle, at § 180.01[2] ("Substantive SEPA authority is alive and well but must be exercised in strict compliance with all pertinent requirements, which must be supported by thorough documentation and convincing evidentiary support in the administrative record.").]* Even so, in the case of major fossil fuel infrastructure projects, like the Westway and Imperium oil shipping terminals, these criteria are satisfied.

With respect to the first criterion, Hoquiam has already identified a number of policies to protect the public's health, safety, and welfare that may be used to deny or condition these terminals under SEPA. Hoquiam Municipal Code§ 11.10.220. The adopted policies are sweeping, including a "fundamental and inalienable right to a healthful environment" for all people, a goal of "[a]chiev[ing] a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities," and a commitment to "enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources." See also RCW 43.21C.020 ("The legislature recognizes that each person has a fundamental and inalienable right to a healthful environment."). Hoquiam's substantive SEPA authorities explicitly incorporate its development, health, and safety codes, as well as its comprehensive plan and Shorelines master program. These explicit SEPA authorities include—among many other things—its shoreline management plan and its zoning ordinances.

Importantly, in 2015, Hoquiam amended its city code to explicitly address the public health, safety, and welfare risks of crude oil shipping terminals. Hoquiam first enacted a moratorium on new crude oil storage facilities and then went through its complete code amendment process to adopt new provisions banning crude oil wholesale storage facilities as a "response to safety and environmental concerns raised by the public and Hoquiam City Councilmembers about 'crude-by-rail' operations at the Port of Grays Harbor." Exh. 35, Hearing Examiner Recommendation, Re: Hoquiam City Council

Resolution No. 2015-09, (TA #15-01) at 2 (Aug. 17, 2015). At the public hearing, the Hearing Examiner probed the purpose behind the proposed code amendments:

> The Hearing Examiner then requested that [Hoquiam City Administrator] Mr. Shay clearly articulate the public purpose behind the proposed amendments. Specifically, how would the proposed prohibition of bulk crude oil storage and transfer serve the public's health, safety and welfare? Mr. Shay responded that train derailments and explosions across the nation in recent years underscored the health and safety risks to communities posed by crude-by-rail operations, and that the Council wanted to protect its citizens from such dangers. By preventing new applications for bulk crude oil storage facilities, the City would effectively be precluding the movement of crude oil within the City of Hoquiam. He also indicated that there were legitimate concerns about the environmental damage that might be occasioned by a crude oil spill in Grays Harbor.
>
> The Hearing Examiner questioned Mr. Shay as to whether the safety concerns identified were unique to crude oil storage and handling and could be distinguished from refined or partially refined products that might be stored in bulk. Mr. Shay responded that unrefined crude oil presented a much greater safety concern, principally because of the large-scale movement of crude oil via railroad.

Hearing Examiner Decision at 6.

On Sept. 14, 2015, Hoquiam adopted its zoning code amendments to "substantially advance the public health , safety and welfare of the citizens of the City of Hoquiam ," Hearing Examiner decision at 17, and rescinded the March moratorium as no longer necessary. Exh. 36 (code amendment language); Exh. 37 (moratorium rescission).

As to the second criterion, the DEISs, even with all the flaws and gaps identified above, find a wide range of serious concerns associated with these projects, including the substantial risk of derailments, spills, and explosions from unit trains carrying crude oil, heightened risks of oil spills and accidents from marine shipping of fossil fuels, and contribution of the projects to greenhouse gas pollution. These are significant and cumulative impacts that the community has recognized.

Finally, as to the third criterion, the DEISs themselves find many of the significant adverse impacts incapable of mitigation. See, e.g., Westway DEIS at S-37, S-39, S-40, S-41, S- 45, S-49, S-51, S-53, S-56, S-58, S-60, S-61, S-63. Many of the impacts of these projects-vast increases in train and marine vessel traffic, and attendant increases in local oil spill hazards, for example-are intrinsic to the projects themselves, and it would presumably not be "reasonable" to limit them in a way that doesn't dramatically alter the project itself. Moreover, limitations on local government's ability to directly mitigate some effects means that some potential mitigation measures to promote safety may not be "capable of being accomplished," unless the proponent agrees to them.

Response T8-120

Comment acknowledged.

Comment T8-121

21.0 OTHER REQUIREMENTS

The DEISs should also include an analysis of the likelihood that Westway and Imperium will comply with mitigation measures. For example, there has been substantial concern that these companies will not be able to demonstrate the requisite financial responsibility before operation of these projects commences, pursuant to RCW 88.40.025. There is nothing preventing the companies from making this demonstration before permits are issued, Quinault Indian Nation v. Imperium Terminal

Servs., LLC, No. 45887-0-II, ---Wash. App. ----, 2015 WL 6437694, at *6 (Wash. Ct. App. Oct. 20, 2015), and Ecology and Hoquiam should make that a requirement.

Response T8-121

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment T8-122

Likewise, the Ocean Resources Management Act ("ORMA") exists to protect Washington's ocean coast against impacts like those related to these projects. See RCW 43.143.010; *id.* at .030. Washington courts have yet to apply ORMA to these projects, but an ORMA analysis in the environmental review could aid decisionmakers in ultimate permitting decisions.

22.0 CONCLUSION

For the reasons set forth above, the DEISs are legally and factually inadequate. The DEISs miss key impacts and fail to take a hard look at all the direct, indirect, and cumulative impacts of the proposed project. Even with their flaws, the DEISs find significant adverse impacts and risks to the Quinault Indian Nation's federally-protected treaty rights and to the environment and public health that cannot be mitigated. The adverse treaty resource, environmental, and public health aspects of the projects demonstrate that the projects should be denied. Ecology and the City of Hoquiam should first demand that the DEISs be amended and supplemented to correct their errors and omissions. Ecology and Hoquiam should then use the analysis and findings in revised draft and final EISs to reject these oil shipping terminals under their substantive SEPA authority.

Sincerely,

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Response T8-122

Comment acknowledged.

Comment T8-123

BIBLIOGRAPHY

Aas, E., Baussant T., Balk L., Liewenborg B., Andersen, O.K. 2000. PAH metabolites in bile, cytochrome P4501A and DNA adducts as environmental risk parameters for chronic oil exposure: a laboratory experiment with Atlantic cod. Aquatic Toxicology 51, 241-258. (Exh. 58).

Armstrong, D.A., Rooper, C, and Gunderson, D. August 2003. Estuarine Production of Juvenile Dungeness Crab (Cancer magister) and Contribution to the Oregon-Washington Coastal Fishery. Estuaries Vol. 26, No. 4B, p. 1174-1188. (Exh. 66).

Bash, Jeff, Cara H. Berman, and Susan Bolton . Effects of turbidity and suspended solids on salmonids. University of Washington Water Center for Streamside Studies, 2001. (Exh. 67)

Black, A. March 2005. Light induced seabird mortality on vessels operating in the Southern Ocean: incidents and mitigation measures. Antarctic Science. Volume 17, Issue 1, pp 67-68. (Exh. 68).

Brenkman, Samuel and Corbett, Stephen. Use of Otolith Chemistry and Radiotelemetry to Determine Age-Specific Migratory Patterns of Anadromous Bull Trout in the Hob River, Washington. Transactions of the American Fisheries Society 136:1-11, 2007. (Exh. 69).

Briggs, K. T., W. B. Tyler, D.B. Lewis, P.R. Kelly, and D.A. Croll. 1983. Brown Pelicans in Central and Northern California. J. Field Omithol. 54(4):353-373. (Exh. 51).

Carlton, J.T. 1999. The scale and ecological consequences of biological invasions in the world's oceans. Invasive Species and Biodiversity Management. 0. Sandulund, P. Schei, and A. Viken, eds. Kluwer Academic Publishers. Dordrecht, Netherlands. 195-212.

Garrott, R.A., L.L. Eberhardt and D.M. Bums. 1993. Mortality of Sea otters Prince William Sound following the Exxon Valdex oil spill. Marine Mammal Science 9; 343-359.

Gordon, Deborah et al. 2015. Know Your Oil: Creating a Global Oil-Climate Index. Carnegie Endowment for International Peace. (Exh. 31).

Grays Harbor Geographic Response Plan. Grays Harbor Geographic Response Plan. 26 Oct. 2015. (Exh. 54).

Hansen, A.J., and R. DeFries. 2007. Ecological mechanisms linking protected areas to surrounding lands. Ecological Applications 17; 974-988. (Exh. 55).

Heintz R.A., Rice S.D., Wetheimer A.C., Bradshaw R.F., Thrower, F.P. Joyce J.E., Short J.W. (2000) Delayed effects on growth and marine survival of pink salmon Oncorhynchus gorbuscha after exposure to crude oil during embryonic development. Marine Ecology Progress Series 208: 205-216. (Exh. 46). Westway and Imperium Terminal Services Expansion Projects EISs

Heugens, E.W.H., Hendriks, A.J., Dekker,T., van Straalen, N.M., and Admiraal, W. June 2001. A Review of the Effects ofMultiple Stressors on Aquatic Organisms and Analysis of Uncertainty Factors for Use in Risk Assessment. Critical Reviews in Toxicology, 31(3):247-284. (Exh. 47).

Ibrahim, A.M. and el-Naggar, M.M.A. 2012. Ballast Water Review: Impacts, Treatments and Management. Middle-East Journal of Scientific Research 12 (7): 976-984. (Exh. 48).

Kennish, M.J. Pollution in Estuaries and Coastal Marine Waters. Journal of Coastal Research Special Issue No. 12: Coastal Hazards, pp. 27-49. (Exh. 49).

Kiewit-General. 2014. Fish Handling Monitoring Report Cycle 4 Float-Out. (Exh. 52). Mantua, N, Tohver, I, and Hamlet, A. 2009. “Impacts of Climate Change on Key Aspects of Freshwater Salmon Habitat in Washington State.” (Exh. 50).

Mastrangelo G., Fadda E., Marzia V., 1996, Polycyclic aromatic hydrocarbons and cancer in man. Environmental health perspectives, 104(11), 1166. (Exh. 57).

Oliveira M.B., Oliveira V L., Coutinho J.A., & Queimada A.J., 2009. Thermodynamic modeling ofthe aqueous solubility of PAHs. Industrial & Engineering Chemistry Research, 48(11), 5530- 5536. (Exh. 60).

Ort, Mark P., Susan E. Finger, and John R. Jones. "Toxicity of Crude Oil to the Mayfly, Hexagenia Bilineata (Ephemeroptera: Ephemeridae)." Environmental Pollution 90.1 (1995): 105-10. (Exh. 61).

Ramachandran, S.D., Hodson, P. V., Kahn, C.W., Lee, K., (2004). Oil dispersant increases PAH uptake by fish exposed to crude oil. Ecotoxicology and Environmental Safety 59, 300--308. (Exh. 56).

Resource Dimensions. 2015. The Chehalis Basin: A Comparative Economic Valuation of Ecosystem Services and Contribution Changes. (Exh. 59).

Sandell, T. and A. McAninch. 2013. Grays Harbor Juvenile Fish Use Assessment: 2012 Annual Report. Wild Fish Conservancy. Prepared for Chehalis Basin Henviabitat Work Group. February 10, 2013. (Exh. 64).

Short, J.W. "Fate and Effect of Oil Spills from the Trans Mountain Expansion Project in Burrard Inlet and the Fraser River Estuary." Prepared for Tsleil-Waututh Nation, City of Vancouver, And Living Oceans Society. May 11, 2015. (Exh. 30).

Stinson, D. W. 2014. Draft periodic status review for the Brown Pelican. Washington Department of Fish and Wildlife, Olympia, Washington. (Exh. 63).

Wahl, T.R., Tweit, B., 2000. Seabird abundances off Washington, 1972-1998. Western Birds 31, 69-88.

The Watershed Company. June 2015. Shoreline Restoration Plan for Shorelines in Grays Harbor County. Prepared for Grays Harbor County, Montesano, WA. (Exh. 53).

US EPA. "Invasive Species." Invasive Species., 16 July 2012. http://water.epa.gov/polwaste/vwd/ballastwater/invasive _species_ index.cfm.

Vinebrooke, R.D., Cottingham, K.L., Norberg, J., Scheffer, M., Dodson, S.l., Maberly, S.C. and Sommer, U. 2004. Impacts of multiple stressors on biodiversity and ecosystem functioning: The role of species co-tolerance, Oikos, 104: 451-457. (Exh. 62).

Response T8-123

Referenced bibliography acknowledged.

Comment T8-124

Quinault Indian Nation Comments on Westway and Imperium DEISs

EXHIBIT 1

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MEMORANDUM

TO: Kristen Boyles, Earthjustice

FROM: Elise DeCola and Sierra Fletcher, Nuka Research CC: Tim Robertson, Nuka Research

DATE: November 10,2015

RE: Grays Harbor Crude-by-Rail Terminal Draft Environmental Impact Statement Review for Westway and Imperium Expansion projects

This memo provides a technical review of the Draft Environmental Impact Statements (DEIS) for the Westway and Imperium Expansion projects in Grays Harbor, including cumulative effects from the U.S. Development Group proposal. Nuka Research and Planning Group, LLC (Nuka Research) was asked to prepare this document to support the Quinault Indian Nation, represented by Earthjustice, in reviewing the DEISs' assessment of oil spill risk and response preparedness related to the potential for tank cars and marine vessels to spill oil in marine waters or rail cars to spill into the Chehalis River.

Summary

We focused our review of the DEIS documents on evaluating the oil spill risks from the proposed expansion of rail car and marine vessel activities in Grays Harbor. In reviewing various descriptions of risk analysis and estimates of risk, we found that it was very difficult to discern from the application a clear and comprehensive assessment of the potential for these expansion projects, individually and together, to increase the risk of oil spills.

While the DEIS documents provide enough information to discern that oil spill risks will generally increase if either or both projects move forward, they do not provide a clear synthesis of risk that accounts for both the likelihood and consequences of a spill from the proposed new activities. We noted the following areas where the oil spill risk analysis is incomplete, unclear, or inaccurate:

- The DEIS documents present both qualitative and quantitative analyses of risk. The qualitative scales characterize oil spill likelihood and impacts on a continuum from “unlikely” to “likely.” When the qualitative scales are compared to quantitative data, they appear to misrepresent the results.
- For example, the qualitative scales represent the likelihood of a 105,000 gallon marine vessel oil spill from the no action alternative as roughly equal to the likelihood of a 1.2 million gallon spill from the Westway expansion. In fact, the likelihood is 2.5 times higher for the 1.2 million gallon spill at Westway. Similar discrepancies exist for the Imperium risk analyses.
- In the rail car risk assessments, the qualitative sliding scales show only slight differences between risks from the no action to the proposed actions, even though the current risk of a crude oil rail car spill is zero.

Response T8-124

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment T8-125

- The DEIS does not distinguish between the broad range of petroleum products that would be transported. The DEIS identifies the following products that could be moved via vessel or rail in the proposed projects: Bakken crude oil, bitumen, ethanol, naptha, gasoline, vacuum gas oil, jet fuel, No. 2 fuel oil, No. 6 fuels oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat. The potential consequences of spills from this wide range of products would vary significantly, as would the ability to contain and recover the different types of product.

Response T8-125

This comment identifies commodities proposed by both Westway and REG (formerly Imperium Terminal Services). Comments specific to the REG project would be addressed in responses to comments in the Final EIS for that project. As noted in Draft EIS Chapter 2, *Proposed Action and Alternatives*, the applicant, Westway, is proposing to store and handle crude oil and not the other commodities listed in the comment. The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods.

Comment T8-126

- The DEIS characterizes the risk of major marine vessel oil spills reaching water as highly "likely" but not absolutely certain. It is implausible that a 1.2 million gallon oil spill from a vessel that hits a dock or jetty would not result in oil reaching water, yet the qualitative scale appears to show that there is some chance that the 1.2 million gallons would not impact the water.

Response T8-126

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment T8-127

- The DEIS lacks sufficient information about the methods used to evaluate potential environmental impacts from the three large marine vessel oil spills described. The qualitative risk evaluation does not distinguish between potential environmental impacts based on spill size, location, or volume spilled. The Risk Assessment Technical Report does not present a consequence analysis, despite the fact that the Modeling Report (Appendix N) shows that for a 15.1 million gallon marine vessel spill, up to 11.2 million gallons is estimated to reach the shoreline within 24 hours. This is an Exxon Valdez-sized spill volume that would impact the Grays Harbor coastline. The potential consequences of such a catastrophic event are not considered.

Response T8-127

As discussed in the Master Response for Environmental Health and Safety Analysis, the analysis of potential environmental health and safety impacts looks at the relative risks for a set of release scenarios that could occur as the result of terminal operations and rail and vessel transport associated with the proposed action. The risk assessment in Appendix N, *Oil Spill Modeling*, does not predict precise locations or spill sizes where spills might occur. This approach provides decision-makers and planners with a range of potential outcomes related to the proposed action to help them understand potential risks and propose targeted mitigation measures. By extension, the Draft EIS does not predict the specific consequences that would affect individual resource areas or populations along rail and vessels transportation corridors with any single release scenario. Rather, Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident occurs.

Additionally, as noted in the discussion of consequences in Draft EIS Chapter 4, *Environmental Health and Safety*, and in Appendix N, the release scenarios for vessels were based in part on regulatory requirements for contingency planning to consider worst-case discharges. To that end, oil trajectory modeling assumed an instantaneous release of the entire release volume and that no efforts to respond to or mitigate a release are made. As noted in Section 4.2, *Applicable Regulations*, several regulations are in place, including design standards for vessels intended to reduce the consequences of a spill in the event of an incident. However, rapid, coordinated response is critical to minimizing the consequences of an oil spill. As noted in Sections 4.4, 4.5, and 4.6, which describe the potential for unavoidable and significant adverse environmental impacts for terminal operations, rail transport, and vessel transport, respectively, no mitigation measures would completely eliminate the possibility of a spill or explosion.

Comment T8-128

- The manner in which oil spill frequency estimates and return rates are presented in the DEIS obscures the basic fact that these projects, if approved, would significantly increase the oil spill risk in Grays Harbor. The quantitative analysis presented in the DEIS estimates that the frequency of large spills from the Westway expansion would increase by 8-fold and at Imperium, spill frequency would increase to 30 times the no-action level. Oil spill frequency would be close to 40 times current levels both projects proceed, and even higher if the U.S. Development project also moves forward.
- The DEIS discusses and presents the project risks in a very compartmentalized manner. Individual probabilities are calculated for spills from rail, terminal, or vessel operations for each project. Cumulative risks are described for specific scenarios for each phase of operations, but these probability estimates are never aggregated. Spill probabilities are also never considered from the perspective of the potentially impacted environment. Based on the information presented in the DEIS, the chance of any size oil spill impacting the marine environment from vessel or terminal operations is 0.44/year. The expected frequency of any type of oil spill (2,100 gallons or more) impacting the marine environment is one spill every 2.2 years. The DEIS does not present this information, and does not consider the potential consequences to the marine environment from one oil spill every 26 months.

Response T8-128

As discussed in the Master Response for Environmental Health and Safety and based on the risk assessment in Draft EIS Appendix M, *Risk Assessment Technical Report*, the analysis of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, evaluates the likelihood of different spill sizes associated with terminal (onsite) operations, rail transportation, and vessel transportation separately. The risks across these operations are not combined in the Draft EIS because of differing regulatory and design requirements described in Chapter 4, because the cause of an incident involving the facility or rail or vessel transport would likely be different, and because the proposed facility, rail line, and vessel transport corridor are physically separated. The conclusions asserted in the comment above are not supported by the analysis in Appendix M.

Comment T8-129

- The DEIS for Westway and Imperium cite an identical set of mitigation measures for marine vessel operations, which were presumably developed in tandem with the vision that these mitigation measures would be jointly funded and implemented. It is unclear whether there would be a reduction to mitigation measures if one but not both projects proceed. If the proposed mitigation were reduced, there could be a corresponding increase in the probability or consequences of marine oil spills.

Response T8-129

Although the Westway and REG (formerly Imperium Terminal Services) Draft EISs were developed and published concurrently, they are independent proposals. Therefore, measures identified in the Westway EIS would be required of Westway if a permit is issued. Implementation of applicant measures would be enforceable through permits. The applicant would be responsible for ensuring such measures were implemented per the terms of the permit. The applicant could fund measures through cost-sharing opportunities, such as with REG, through grant opportunities, or other means if desired. Implementation of those measures would be the sole responsibility of Westway, regardless of lost potential for cost sharing.

Comment T8-130

- A simple arithmetic approach is used to estimate potential impacts of rail car incidents to sensitive habitats based on the percentage of the rail corridor that is proximate to sensitive areas. This is not a valid consequence analysis method.

Response T8-130

As discussed in the Master Response for Environmental Health and Safety Analysis, the analysis of potential environmental health and safety impacts looks at the relative risks for a set of release scenarios that could occur as the result of terminal operations and rail and vessel transport associated with the proposed action. The risk assessment in Appendix N, *Oil Spill Modeling*, does not predict precise spill sizes or locations where spills might occur. This approach provides decision-makers and planners with a range of potential outcomes related to the proposed action to help them understand potential risks and propose targeted mitigation measures. By extension, the Draft EIS does not predict the specific consequences that would affect individual resource areas or populations along rail and vessels transportation corridors with any single release scenario. Rather,

Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident occurs.

Comment T8-131

- The modeled oil spill scenarios use medium crude oil as a proxy for a range of project oils, including Bakken crude and diluted bitumen; in reality, the chemical and physical properties of these and other potentially transported oils vary widely. Modeled behavior of medium crude oil may not accurately describe how a diluted bitumen or Bakken crude spill would behave.

Response T8-131

As discussed in the Master Response for Oil Spill Modeling Methods, Draft EIS Appendix N, *Oil Spill Modeling*, acknowledges the limitations of the selected modeling tool to consider Bakken crude oil or diluted bitumen specifically. The model developer, NOAA, was consulted to assist in finding a suitable proxy; medium crude oil was used based on their guidance. To provide additional information about the weathering behavior of these types of oil in the environment, a comparison of behavior of the medium crude oil proxy, Bakken crude oil, and diluted bitumen in the environment was competed using ADIOS and is presented in Appendix N.

Comment T8-132

- The modeled oil scenario trajectory maps are not informative about the scale of potential impacts, and the trajectory models are not used to evaluate potential consequences of a major marine oil spill. A consequence analysis that considered the spill trajectories against local wildlife, human use, and environmental sensitivities would inform the overall project risks.

Response T8-132

As discussed in the Master Response for Environmental Health and Safety Analysis, the analysis of potential environmental health and safety impacts looks at the relative risks for a set of release scenarios that could occur as the result of terminal operations and rail and vessel transport associated with the proposed action. The risk assessment in Appendix N, *Oil Spill Modeling*, does not predict precise spill sizes or locations where spills might occur. This approach provides decision-makers and planners with a range of potential outcomes related to the proposed action to help them understand potential risks and propose targeted mitigation measures. By extension, the Draft EIS does not predict the specific consequences that would affect individual resource areas or populations along rail and vessels transportation corridors with any single release scenario. Rather, Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident occurs, including the potential impacts on wildlife and human health.

Comment T8-133

- The escort fleet proposed to support the expansions will likely be inadequate to support the cumulative increases in large commercial vessel traffic.

Response T8-133

Draft EIS Chapter 6, Section 6.5.6.2, *Cumulative Impacts*, provides an analysis of the capacity of the existing fleet of harbor tugs in Grays Harbor to escort laden tank vessels related to the cumulative

projects. As described in that section, the tank vessels related to the cumulative projects would not exceed the capacity of the existing tugs.

Comment T8-134

- A vessel management system is proposed as a mitigation measure with no corresponding discussion of how it would be operated or funded.

Response T8-134

The vessel management system identified in the referenced mitigation measure could be developed in different ways. How it is operated would depend on what form it takes. The regulatory expertise and responsibilities of the groups identified in the mitigation measure would apply. Final EIS Chapter 3, Section 3.17.7.1, *Applicant Mitigation*, and Chapter 4, Section 4.6.3.1, *Applicant Mitigation*, reflect additional text indicating the funding responsibility of the applicant for this mitigation measure. In addition, the measure has been revised to reflect new Washington State legislation in RCW 88.16.

Comment T8-135

- The significant increase in potential spill frequencies described in the DEIS should warrant a critical examination of the capacity of oil spill response resources available to respond to a Grays Harbor area spill.

Response T8-135

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. As noted, the federal and Washington State rules use an approach that allows equipment to be cascaded into the area within regulatory periods. Equipment is listed by plan holders and response contractors on the Western Response Resource list at www.wrrl.us. This equipment is available for use in a facility, rail, or vessel spill. Final EIS Chapter 4 reflects additional mitigation measures to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment T8-136

DEIS Documents Reviewed

Nuka Research focused our review on the following components of the DEIS, inclusive of cross-referenced studies.

- Westway Expansion Project and Imperium Terminal Services Expansion Project DEISs

- Chapter 2, Proposed Actions and Alternatives
- Chapter 3, Section 3.17: Affected Environment, Vessel Traffic
- Chapter 4, Section 4.6: Environmental Health Risks- Vessel Transport o Chapter 5: Extended Rail and Vessel Transport
- Chapter 6: Cumulative Impacts
- Appendix N: Oil Spill Modeling

- Risk Assessment Technical Report (Appendix M to both DEISs)

Because of the parallel organization of the two DEIS documents, references to section numbers apply to both documents, unless otherwise noted.

Detailed Comments

Oil Spill Risk Analysis Methods and Results

The additional marine vessel and rail car movements associated with the two proposed projects (Westway and Imperium) increases the potential for an oil spill to occur and adversely impact wildlife and their habitat, plant life, and human populations. The DEIS documents present information about oil spill risks, but the methodology for the oil spill risk assessments is not clearly explained, and there are significant gaps in the analysis and results. Because oil spill risk information is presented so unevenly, it is difficult to distill out the fact that the potential for an oil spill to impact Grays Harbor increases significantly if these projects are approved.

Response T8-136

For information about the methods, assumptions, and sources of data used in the risk assessment, refer to the Master Response for Risk Assessment Methods.

Comment T8-137

Qualitative Scales are Misleading (Marine Vessel Risks)

Figures 4.6-1 and 4.6-2 present a qualitative diagram meant to represent the risk components for three different large marine vessel spill scenarios under the no action alternative (4.6-1) and the proposed action (4.6-2). The scale is bounded by “unlikely” and “likely” but does not provide any calibration for understanding this scale. Intuitively, it appears to be a linear scale, but this is never explicitly stated. The use of qualitative tools to interpret risk for a non-technical audience is a reasonable approach, but the sliding scales presented in the DEIS are not a standard method; as practitioners of oil spill risk assessment we have never come across this approach. The qualitative “sliding scale” oversimplifies a complex process, and its relationship to the quantitative risks as estimated in the DEIS is not clear.

Response T8-137

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment T8-138

Likelihood of an Incident

The "unlikely" to "likely" scale appears to be relative, rather than absolute. For example, as shown in the excerpts from Figures 4.6-1 and 4.6-2 (Westway), the location of the red sliding box is in the same location for a 105,000 gallon spill under the no action alternative (Figure 4.6-1) as it is for a 1.2 million gallon spill under the proposed expansion, suggesting that the likelihood of a 1.2 million gallon spill from Westway if the expansion proceeds would be equivalent to the current risk of a 105,000 gallon spill from existing operations. However, the quantitative assessment shows that the return period for the 1.2 million gallon spill under the Westway expansion is 1 in 360 years, while the likelihood of a large spill under no-action is **1 in 920 years. The likelihood of a 1.2 million gallon spill from Westway expansion is 2.5 times higher than the likelihood of a 105.000 gallon spill under no action, yet the two figures show these as essentially equivalent using the qualitative scale.** This is misleading and inaccurate.

The same technique is applied in the Imperium DEIS, with similarly misleading results. The figure to the left shows the side-by-side comparison from the Imperium DEIS Figures 4.6-1 and 4.6-2. Again, the qualitative scale depicts roughly the same value for a 105,000 gallon spill under no action as a 1.2 million gallon spill for the Imperium expansion, even though **the likelihood of a 1.2 million gallon spill from the Imperium expansion is 3 times the likelihood of a 105.000 gallon spill under no action.** Again, this qualitative scale misrepresents the quantitative estimates.

The cumulative impact analysis uses this same approach to show the aggregate risks from Westway and Imperium (shown below). Again, the calibration across the various figures is unclear.

Response T8-138

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment T8-139

Likelihood of Oil Spill Reaching Water

The second Risk column in Figure 4.6-2, "Likelihood of Reaching Water" shows the same value for all three scenarios, which is close to likely but not all the way there (the absence of a numeric scale makes it awkward to try to describe what this figure is attempting to communicate). It is difficult to conceive of how any of these three vessel scenarios- which represent spill sizes ranging from 105,000 gallons to 1.2 million gallons and occur from an underway vessel- would not result in oil reaching the water. The DEIS does not explain why this scale does not depict the likelihood of a major marine vessel spill reaching water as fully likely, since it would be unavoidable.

Potential Environmental Impacts

The third Risk column, "Potential Environmental Impacts," shows the difference in risk from the no action alternative (4.6-1) to the proposed action (4.6-2). The qualitative scale indicates a slight increase in likelihood of an incident occurring (first column) and no change to the potential environmental impact (third column). This does not make sense, because under the no action condition, there would be no change to the products that could spill in Grays Harbor, while the

proposed action would introduce several new types of petroleum oil into the system. Logically, the introduction of large marine vessels moving petroleum oils through Grays Harbor increases the potential for environmental harm, yet the DEIS figures appear to suggest that the potential for adverse environmental impacts from a crude oil tank vessel spill are equivalent to the potential adverse environmental impacts from existing vessel traffic, which include large commercial cargo vessels and tank vessels carrying methanol, but no crude oil-carrying vessels. The accompanying text does not justify the highly improbable notion that the environmental impacts from a crude oil tanker spill would be the same as for a fuel oil spill from existing traffic, even though the spill volume from a tanker would be much higher.

In Figure 4.6-2, the environmental impacts column has the same value for all three scenarios, suggesting that the environmental impacts of a 105,000 gallon spill would the same as from a 1.2 million gallon spill. It also seemingly does not consider which product is spilled. The potential impacts of Bakken crude oil, bitumen, ethanol, naptha, gasoline, vacuum gas oil, jet fuel, No. 2 fuel oil, No. 6 fuels oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat would vary significantly.

The underlying methods for the qualitative evaluation of environmental impacts are not described, and none of the DEIS materials provide an actual consequence analysis to systematically evaluate the potential impacts associated with the three large marine vessel oil spill scenarios presented.

Response T8-139

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment T8-140

Quantitative Oil Spill Risk Analysis Incomplete (Marine Vessel Risks)

Tables 15 and 19 in Appendix M present frequency estimates for potential vessel oil spills under the existing conditions (Table 19) and proposed actions/cumulative projects (Table 15). The relationship between the two tables is not clearly explained, but it appears that Table 15 shows how the predicted oil spills would increase from the baseline (no-action) numbers in Table 19. In this case, the data show a significant increase in the potential for oil spills, but the accompanying text does not clearly state this. The quantitative analysis presents three large spill scenarios, but does not address the potential for small to medium spills, which are by far the most common and are likely to occur if either project is approved. The aggregate probability for spills from Westway and Imperium, along with the US Development project also proposed for Grays Harbor, is not clearly calculated or explained.

Response T8-140

Draft EIS Appendix M, *Risk Assessment Technical Report,* Table 15 presents the risks of a crude oil spill associated with the proposed action, REG (formerly Imperium Terminal Services) Terminal Expansion Project, and the cumulative scenario for three potential vessel-related incidents: collision, allision, and grounding. Table 19 presents the risks associated with existing operations at the project site that would be ongoing under the no-action alternative for the same three potential incident types. The tables are not directly comparable because in the case of Table 15, the risks

incorporate the addition of vessel transport of crude oil related to the proposed action whereas, in Table 19, the risks are associated with existing operations involving methanol transport. As stated in the comment, the potential for oil spills would increase under the proposed action because no crude oil operations occur under existing conditions. Draft EIS Chapter 4, Environmental Health and Safety, presents a full discussion of potential impacts.

As noted in Appendix N, *Oil Spill Modeling,* the release scenarios include spill volumes up to the amount specified, meaning that the chances of any release scenario occurring include the possibility of a smaller spill for the same three incidents. The small to medium spills mentioned in the comment would most likely be associated with vessel loading activities. These are covered in Section 4.4, *Environmental Health Risks—Terminal (Onsite)* and Appendix M, Chapter 3, *Terminal (Onsite) Evaluation*. As noted in Appendix M, the cumulative scenario assumes terminal, rail, and vessel operations associated with concurrent operations of the proposed action, the REG (formerly Imperium Terminal Services) Expansion Project, and the Grays Harbor Rail Terminal Project. The frequency of incidents was summed for the three projects based on their activity levels. Tables 3 and 9 of Appendix M include the assumed vessel traffic volumes that were used in the cumulative risk assessment.

Comment T8-141

Significant Increase in Frequency of Oil Spills

The predicted frequency of a 105,000 gallon spill from a collision from a Westway vessel under current conditions as shown in Table 19 is 0.0011; this increases by 0.008 events/year based on the information in Table 15. **This means the predicted frequency of a large spill from a collision increases 8-fold at Westway** (from 0.0011 to 0.0091). **At Imperium, the predicted frequency Increases by 30-fold** (from 0.00047 to 0.01447).

The estimated frequency of a 15.1 million gallon spill from an allision increases 8-fold for Westway and 28-fold for Imperium. For a 1.2 million gallon grounding scenario, the frequency also increases 8-fold for Westway and 29-fold for Imperium. When the cumulative changes are considered, the frequency of potential spills increases even more substantially, but cannot be calculated from the information in the DEIS because Table 19 does not estimate the cumulative frequency of oil spills under existing conditions.

Overall, the predicted frequency of oil spills in Grays Harbor increases to 8 times the current level if the Westway expansion occurs, 30 times the current level if the Imperium expansion occurs, and even more (roughly 38 times the current level) if both projects proceed. As discussed below, the aggregate probability of an oil spill occurring if the U.S. Development project also proceeds is not clearly presented in the DEIS.

Like other risk estimates in these DEIS documents, these analyses presume that the consequences of current (no-action) spills of non-crude oil products is equivalent to potential future risks of crude oil spills; this is an incorrect assumption.

Response T8-141

As noted in the response to the previous comment, Tables 15 and 19 are not directly comparable to each other because, in the case of Table 15, the risks associated with the proposed action, REG (formerly Imperium Terminal Services) Expansion Project, and the cumulative scenario (including

U.S. Development) adds the vessel transport of crude oil related to the proposed action, whereas, in Table 19, the risks are associated with continuation of existing operations involving methanol transport at the project site and primarily biodiesel-related products at the REG project site under the no-action alternative. U.S. Development's Grays Harbor Rail Terminal Project is not included in Table 19 because it there are no current operations that would be expected to continue under the no-action alternative. Draft EIS Chapter 4, *Environmental Health and Safety*, acknowledges that implementation of the proposed action presents new risks that would not otherwise occur.

Comment T8-142

Small and Medium Spills from Vessels at Terminal not Included with Vessel Spill Risks

Table 6-19 (Cumulative Risks) describes a series of small, medium, and large spills, including 2,100 gallon (small) and 10,000 gallon (medium) transfer spills during vessel loading. Table 2 (Section 3.3) presents probabilities for these smaller events, which are expected to occur at a much higher frequency than larger spills. Presumably, a spill during vessel loading would have the potential to impact the marine environment. However, both the qualitative and quantitative risk estimates only present the probabilities for larger vessel spills. In order to appreciate the cumulative risks to the marine environment, the presentation of results for vessel oil spill risks should also present small and medium-sized spills, which have the potential to occur much more frequently and can have significant environmental impacts, depending upon timing and location.

Response T8-142

As noted in Appendix N, *Oil Spill Modeling*, the release scenarios include spill volumes up to the amount specified, meaning that the chances of any release scenario occurring includes the possibility of a smaller sized spill from the specified event. The small to medium spills mentioned in the comment are most likely to occur during rail unloading or vessel loading activities rather than during vessel transit. These are covered in Appendix M, *Risk Assessment Technical Report,* Chapter 3, *Terminal (Onsite) Evaluation*, and Draft EIS Chapter 4, Section 4.4, *Environmental Health Risks—Terminal (Onsite)*. The reason that incidents occurring during vessel transit are skewed to the larger spill sizes is because the magnitude of the incident must be sufficiently great that the forces involved to penetrate the hull of the vessel. In those cases, the releases sizes are more likely to be relatively larger given the loss of integrity of at least one compartment.

Comment T8-143

Cumulative Oil Spill Risks Not Adequately Expressed

While there are several places in the DEIS documents where cumulative oil spill risks are discussed, the DEIS does not adequately consider the cumulative risks from **all types and sources of oil spills**. There are many examples throughout the DEIS where risks are compartmentalized based on the source of the spill (vessel, rail, terminal), the size of the spill, or the potential spiller (Westway, Imperium, or U.S. Development); yet, the aggregate risk of any type or size of incident occurring from any of these potential sources is never presented.

Aggregate probability of events that are not mutually exclusive can be estimated by summing up the individual probabilities. If, for example, one was interested in understanding the potential for any spill from the terminal or associated vessels to impact the marine environment, the individual probabilities could be added together. The Risk Assessment Technical Report (Appendix M)

provides the following values for cumulative predicted increases in frequency of release (event/year, based on data in Table 2 and Table 15):

- 2,100 gallon vessel loading spill: 0.38
- 10,000 gallon vessel loading release: 0.023
- 50,400 gallon release from pipeline or storage tank due to seismic event: 0.0022
- 8.4 million gallon (Westway) or 3.36 million gallon (Imperium) storage tank failure: 0.00011
- 105,000 gallon spill from vessel collision: 0.022
- 15.1 million gallon spill from vessel allision: 0.0086
- 1.2 million gallon spill from vessel grounding: 0.0078

The additive probability- the chance that any of these types of spills might occur if Westway, Imperium, and U.S. Development projects proceed- is 0.44. **The chance of any size spill impacting the marine environment in a given year is 44%. The expected frequency of any type of oil spill (2.100 gallons or more) impacting the marine environment is one spill every 2.2 years.**

The DEIS does not present this information, and does not consider the potential consequences to the marine environment from one oil spill every 26 months.

Response T8-143

As discussed in the Master Response for Environmental Health and Safety Analysis, the analysis of potential environmental health and safety impacts looks at the relative risks for a set of release scenarios that could occur as the result of terminal operations and rail and vessel transport associated with the proposed action. The risk assessment in Appendix N, *Oil Spill Modeling*, is not intended to predict the most likely outcomes associated with the proposed action. As discussed further in that master response, the approach was selected to provide decision-makers and planners with a range of outcomes related to the proposed action and related rail and vessel transport.

As further discussed in the Master Response for Environmental Health and Safety and based on the risk assessment in Draft EIS Appendix M, *Risk Assessment Technical Report*, the analysis of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, evaluates the likelihood of different spill sizes associated with terminal (onsite) operations, rail transportation, and vessel transportation separately. The risks across these operations are not combined in the Draft EIS because of differing regulatory and design requirements described in Chapter 4, because the cause of an incident involving the facility or rail or vessel transport would likely be different, and because the proposed facility, rail line, and vessel transport corridor are physically separated.

Comment T8-144

Overlapping Mitigation Measures (Marine Vessel Risks)

The DEIS documents for Westway and Imperium both include a list of mitigation measures to reduce the potential for marine vessel incidents to occur and cause oil spills. These measures are repeated in several places throughout the DEIS documents (e.g. Section 3.17.7.1, Section 4.6.3.1) and are identical for both expansion project proposals. Since both projects are proposing the same mitigation measures, it is reasonable to assume that these measures were developed jointly and envision a cooperative approach to funding and implementation. However, it is not clear what

would happen in the event that one or the other, but not both, of these projects was permitted. Would the commitments be reduced if a single operator was required to bear the full costs of implementation? Any changes or reductions to mitigation measures could cause a corresponding increase to the risk or impacts of an oil spill.

Response T8-144

As noted previously, although the Westway and REG (formerly Imperium Terminal Services) Draft EISs were developed and published concurrently, they are independent proposals. Therefore, measures identified in the Westway EIS would be required of Westway if a permit is issued. Implementation of applicant measures would be enforceable through permits. The applicant would be responsible for ensuring such measures were implemented per the terms of the permit. The applicant could fund measures through cost-sharing opportunities, such as with REG, through grant opportunities, or other means if desired. Implementation of those measures would be the sole responsibility of Westway, regardless of lost potential for cost-sharing.

Comment T8-145

Rail Car Oil Spill Risks and Mitigation

Crude by rail is a relatively new risk in Washington. Table 5-1 and Figure 5-2 show that prior to 2012, this risk did not exist. As shown in Table S-5, there are no crude oil by rail terminals currently operating in Grays Harbor, so like tank vessel crude oil spills, crude oil rail car spills in Grays Harbor are an entirely new risk that would be created by these two proposed actions. Section 4.5.1 indicates that current rail traffic consists of grain, auto, and mixed freight trains, a few of which contain methanol, vegetable oil, sodium methylate, biodiesel, and glycerin.

Section 5.7 acknowledges that no mitigation measures can completely eliminate the possibility of a large oil spill, fire or explosion from rail cars carrying crude oil. Therefore, the proposed expansion projects create a new risk (crude oil incident) in Grays Harbor.

Response T8-145

Draft EIS Chapter 4, *Environmental Health and Safety*, acknowledges that the proposed action would introduce new risks associated with the handling, storage, and transport of crude oil in the study area.

Comment T8-146

Qualitative Scales are Misleading

Figure 4.5-1 presents a “sliding scale” risk evaluation for the no action alternative, and Figure 4.5-2 shows the risks from the proposed action. These are similar to the scales used for the vessel oil spill risks, and like those figures, are ambiguous and difficult to interpret.

- The likelihood of an incident for a small spill (1,000 gallons) during rail transport is shown as virtually equivalent on the sliding scales in Figures 4.5-1 and 4.5-2. But the bullet lists that follow these illustrations describe the likelihood of a small spill as once every 170 years under no action, and once every 63-66 years under the proposed action. The illustrations do not clearly depict this 250% increase in likelihood.

- The likelihood of an incident for a medium spill (30,000 gallons) is also shown as equivalent on both Figures 4.5-1 and 4.5-2, but again the numeric estimates provided in the text below the figures show an increase from once in 97 years to once every 23-27 years. This is more than a 350% increase in likelihood, but is not clearly expressed in evaluating the two figures.
- The likelihood of an incident from a large 3-car incident (90,000 barrels) increases from once every 6,300 years to once every 160-270 years. This is a more than 23 times (2300%) increase in likelihood. Again, the two figures do not represent this significant increase from the no action to the proposed action.

Response T8-146

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment T8-147

The Risk Assessment Technical Report cites a rail transportation model from 1996 as the source of frequency data for release sizes from rail car spills; however, this report significantly predates the crude by rail transportation boom in the U.S.; therefore the spill statistics are for all hazardous materials. **The analysis is essentially taking 20-year old data on hazardous materials rail car incidents and using this as a proxy for the current baseline of crude oil tank car rail spills for the no-action alternative.** In fact, those accident rates are not a valid proxy for the no-action frequency of crude oil spills from rail cars, which should be zero.

Response T8-147

The 1996 model referred to in the comment allows for application of current accident rate and consideration of different configurations of tank cars (such as thicker walls, jackets, fitting protection, and other factors that will be on the new designs required under the May 2015 final rule). This model is primarily used for the evaluation of different numbers of cars derailing and spilling, not for a source of 20-year-old data.

Comment T8-148

The accident rate assumptions used to calculate release probabilities from rail cars is 1E-5 per train mile, which is significantly lower than the calculated historical accident rate for PS&P (2.2E- 5), based on the assumed "improvements that PS&P has planned prior to the implementation of the proposed actions." Given that these are assumed and unproven changes, the use of a substantially lower release probability is not justified.

Response T8-148

It is assumed the rates listed in the comment refer to accident rates and not release rates. As noted in Draft EIS Appendix M, *Risk Assessment Technical Report,* Section 4.2.2, *Accident Rates*, although PS&P accidents rates through 2014 are roughly ten times the national average, at 2.2E-5 per train mile, with the changes made by PS&P since the accidents in April and May 2014, and assuming the implementation of improvements that PS&P has planned, a long-term rate of 1E-5 per train mile was applied in this analysis. This is still higher than the national average for accidents.

Comment T8-149

Page 4-8 of the Risk Assessment Technical Report calculates that the likelihood of a derailment occurring near critical marbled murrelet habitat is once in 720 (Westway) or 450 (Imperium) years, by presuming that 5% of rail accidents would impact this habitat, since it represents 5% of the total route. This straight arithmetic calculation presumes that the likelihood of a spill occurring is equal along all stretches of the route is equal, which is not necessarily the case. It also discounts the potential for a spill that occurs at other points along the route to migrate over water or land to impact the critical habitat. This is not a valid approach to evaluating potential consequences to critical habitat.

Response T8-149

As described in the Master Response for Environmental Health and Safety Analysis, the impacts analysis presented in the Draft EIS focuses on the risks of a set of spill scenarios rather than predicting where a specific incident of a certain type may be more likely. The detailed approach explained in Appendix M, *Risk Assessment Technical Report,* evaluates the likelihood of certain incidents occurring, and considers all causes of failure, including construction defects, natural hazards, human error, and material failures.

Comment T8-150

Cumulative Oil Spill Risks Not Adequately Expressed

Aggregate probability of events that are not mutually exclusive can be estimated by summing up the individual probabilities. If, for example, one was interested in understanding the potential for any spill occurring from a rail car, the individual probabilities could be added together. The Risk Assessment Technical Report (Appendix M) estimates the frequency of rail car release in 2017 and 2037 if both projects proceed (event/year, based on data in Table 5, shown below).

Table 5. Representative Probabilities of Different Release Sizes during Rail Transport

Failure Event and Potential Associated Release	No-Action Alternative[a]	2017 Operations[b]	2037 Operations[c]
Partial one rail car spill scenario (1,000 gallons or 23.8 barrels)	0.02	0.08	0.07
One rail car spill scenario (30,000 gallons or 714 barrels)	0.035	0.21	0.17
Three rail car spill scenario (90,000 gallons or 2,14 barrels)	0.00054	0.03	0.02
Five rail car spill scenario (150,000 gallons or 3,570 barrels)	Not evaluated	0.0015	0.00066
30 rail car spill scenario (900,000 gallons or 21,400 barrels)	Not applicable	0.0001	0.0005

a. The release probabilities associated with the no-action alternative assume fewer rail cars of interest per train.
b. 2017 Operations assumes a mix of 50% current jacketed CPC-1232 rail cars (no upgraded CPC-1232s yet, but also no DOT-111s) and 50% new DOT-117s.
c. 2037 Operations assume use of an DOT-117 rail cars.

The additive probability- the chance that any of these types of spills might occur if Westway, Imperium, and U.S. Development projects proceed- is 0.32 for 2017 operations and 0.26 for 2037 operations. Under the no action alternative, the probability is 0.05. **The chance of any size oil spill from rail operations increases from 5% per year to 32% per year (2017 operations).** The return rate for rail car spills (2017 operations) increases from once every 20 years under the no action alternative to once every 3.1 years if the projects proceed.

The DEIS does not present this information, and does not consider the potential consequences to the environment from one oil spill every three years.

Response T8-150

As discussed in the Master Response for Environmental Health and Safety and based on the risk assessment in Draft EIS Appendix M, *Risk Assessment Technical Report*, the analysis of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, evaluates the likelihood of different spill sizes associated with terminal (onsite) operations, rail transportation, and vessel transportation separately. The risks across these operations are not combined in the Draft EIS because of differing regulatory and design requirements described in Chapter 4, because the cause of an incident involving the facility or rail or vessel transport would likely be different, and because the proposed facility, rail line, and vessel transport corridor are physically separated.

Comment T8-151

Oil Spill Modeling Assumptions and Inputs

The modeling assumptions and inputs used to evaluate potential oil spill trajectories and consequences are not adequate to evaluate the potential impacts of a major oil spill to coastal, marine, and riverine environments and resources.

Response T8-151

Refer to the Master Response for Oil Spill Modeling Methods for a discussion of approach, assumptions, and limitations of the oil spill model.

Comment T8-152

Type of Oils Handled

In various places, the DEIS documents identify the following as products that may be transported by the Westway and Imperium expansion projects: Bakken crude oil, bitumen, ethanol, naptha, gasoline, vacuum gas oil, jet fuel, No. 2 fuel oil, No. 6 fuels oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat. These products vary significantly in their physical and chemical properties, but the modeling reports in both DEIS (Appendix N) use medium crude oil as a proxy for Bakken and diluted bitumen. Bakken crude and diluted bitumen are very different products, and medium crude oil is not necessarily a valid proxy for either. Bakken crude is generally characterized as a light sweet crude oil high in light-end hydrocarbons that make it particularly flammable when compared to conventional crude oil. The density of Bakken crude typically ranges from 39.7° to 42.2° API gravity (CRS, 2014). Diluted bitumen blends are heavier, sour crude oils. Densities for diluted bitumen are typically below 20° API gravity (CRS, 2014). Neither of these oils fall into the range for medium crude oils, which are typically characterized as having an API gravity between 27 and 35° (Exxon Mobil, 2015). Medium crude oil is not an appropriate proxy for either Bakken crude or diluted bitumen, and the model outputs do not necessarily reflect the potential fate and effects of a spill of either of these substances.

Response T8-152

This comment identifies commodities proposed by both the applicant and REG (formerly known as Imperium Terminal Services). Comments specific to the REG project would be addressed in responses to comments in the Final EIS for that project. As noted in Draft EIS Chapter 2, *Proposed Action and Alternatives*, the applicant is proposing to store and handle crude oil and not the other commodities listed in the comment.

As discussed in the Master Response for Oil Spill Modeling Methods, Draft EIS Appendix N, *Oil Spill Modeling*, acknowledges the limitations of the selected modeling tool to consider Bakken crude oil or diluted bitumen specifically. To provide additional information about the behavior of these types of oil in the environment, a comparison of behavior of the medium crude oil proxy, Bakken crude oil, and diluted bitumen, in the environment was competed using ADIOS and presented in Draft EIS Appendix N, *Oil Spill Modeling*.

Comment T8-153

Modeled Scenarios

The scenarios modeled in Appendix N represent a 10,000 gallon loading spill at berth, a 2 million gallon (Imperium) and 8.4 million gallon (Westway) storage tank spill, and a 15.1 million gallon spill from a vessel at the entrance from Grays Harbor. These scenarios differ from the spill scenarios presented in the Risk Assessment Technical Report (Appendix M), which describe a catastrophic scenario for Imperium as 3.36 million gallons.

Response T8-153

This comment identifies scenarios specific to REG (formerly known as Imperium Terminal Services). While although that project is still considered in the cumulative risk scenarios, comments specific to the REG project would be addressed in responses to comments in the Final EIS for that project. It should be noted that the comment is correct. Final EIS Appendix M, Table 2 has been revised to correct the typographical error. The volume associated with REG's largest proposed tank should read 3.36 million gallons (80,000 barrels).

Comment T8-154

Duration of Scenarios

Trajectory analyses only model the first 48 hours of each spill. It is common practice to model out to 72 hours, and while the use of a shorter modeling duration is not necessarily invalid, the rationale for this timeframe should be explained.

Response T8-154

In addition to the spill sizes being informed by existing regulations,[22] the analysis also adhered to planning requirements to show spill trajectories in 24- and 48-hour increments (WAC 173-182-405). Consistent with these standards, the oil spill modeling assumes that no efforts to respond or mitigate a release are made.

Comment T8-155

Trajectory maps

The trajectory maps presented in Figures 1 through 6 of the Westway DEIS lack any quantitative scale. For example, the dark red dots that depict beached oil do not ascribe any parameters to the amount of oil represented by each dot. GNOME typically outputs data such that each dot can be interpreted as a standard volume of oil, and this helps with comparing trajectory maps and understanding impacts. When comparing the maps in Figures 1 and 2, which represent a 238 barrel spill, with Figures 3 and 4 (200,000 bbl spill) and Figures 5 and 6 (360,000 bbl spill) and comparing shoreline oiling, the smallest spill (Figures 1 and 2) seems to result in much more extensive shoreline oiling within Grays Harbor than the much larger spill in Figures 3 and 4. The thickness of the dots in Figure 5 and 6 seem to suggest that the shoreline oiling for this largest spill scenario, which impacts the outer coast more than Grays Harbor, is more severe than the other two scenarios, but this is never explained.

[22] The quantity of oil spilled for these scenarios was based upon the definition of worst-case spill in WAC 173-182 (Oil Spill Contingency Plan) for an onshore facility, a vessel, and for rail transport. For an onshore facility, the worst-case spill means the entire volume of the largest aboveground storage tank, which for the proposed action would have a capacity of approximately 8.4 million gallons (200,000 barrels of crude oil). For a vessel, the worst-case spill means a spill of the vessel's entire cargo and fuel. The largest tankers would be Panamax class with the capacity to hold up to 14.7 million gallons (350,000 barrels). An additional 420,000 gallons (10,000 barrels) was added to represent the fuel onboard the vessel. The transfer release was estimated taking into account the proposed transfer rate to the vessel multiplied by approximately 1 minute and 25 seconds to account for the maximum shutdown response time.

Similarly, the use of yellow, green and pink shading to depict light, medium, and heavy oiling does not provide much context for evaluating impacts. The largest extent of continuous heavy oiling (pink) appears in Figure 2, a 238-bbl spill at the Terminal under low flow conditions in winter. The trajectory map in Figure 4, which shows the 200,000-bbl spill at the same location under the same conditions, does not show as much heavy oiling despite the 100-fold increase in spill volume. This is counter-intuitive and is not well explained in the modeling report. The total area of pink in Figures 5 and 6, which depict the 360,000-bbl spill, are smaller than the Grays Harbor spill. While this may be attributable to increased spreading, no such explanation is provided.

Response T8-155

The output of GNOME was converted using GNOME Analyst (a NOAA Application). GNOME Analyst converts the "best guess" splot number and position data into oil density contours. The contours are intended to provide a practical view of how the oil may spread given the spill and environmental factors discussed in Draft EIS Appendix N, *Oil Spill Modeling*. The mass balance results in Table 2 of Appendix N can be used to calculate the amount of oil in gallons or barrels that is estimated by the model (within a range) to remain floating, to be beached, or that could have evaporated or dispersed.

The referenced maps are two-dimensional. They represent snapshots of the spill impacts and densities at only two points in time, at a 24-hour period and at a 48-hour period. The movement of oil prior to or after these snapshot representations shows a different degree of oil impact and oil densities in different locations due to the flow of water in Grays Harbor over time as influenced by tides and currents and the oil spreading as influenced by the wind.

Potential oil spill impacts are discussed in the context of two historical oil spills in Attachment A to Appendix N.

Comment T8-156

Significant Shoreline Impacts

The modeling reports include a mass balance estimate that predicts the percentage of the oil spill that would be floating on the water, evaporated/dispersed, and "beached," or stranded on shorelines where it must be cleaned up. The trajectory analyses for Westway estimate that 24 hours after a 10,000 gallon spill, up to 74.3% of the oil (7,430 gallons) would have reached the shoreline. For a 15.1 million gallon spill, up to 74.5% (11.2 million gallons) is estimated to reach the shoreline by hour 24. For this largest spill, that amounts to a volume of oil the size of the Exxon Valdez oil spill along the Grays Harbor and outer coastline, where it would impact shoreline habitats, birds, and other species.

These analyses emphasize that the window of opportunity to contain and recover oil before it impacts shorelines is incredibly short, which has implications to oil spill response preparedness (discussed below).

Response T8-156

Draft EIS Appendix N, *Oil Spill Modeling*, indicates that the release scenarios were informed by existing regulations and that the analysis adhered to planning requirements to show spill trajectories in 24- and 48-hour increments (WAC 173-182-405). Consistent with these standards,

the oil spill modeling effort assumes that no efforts to respond to or mitigate a release are made. As noted in Chapter 4, Section 4.2, *Applicable Regulations*, several regulations are in place, including design standards for rail cars and vessels intended to reduce the consequences of a spill in the event of an incident. However, rapid, coordinated response is critical to minimizing the consequences of an oil spill.

Comment T8-157

Lack of Consequence Analysis

One of the values in conducting oil spill trajectory analyses is to evaluate the vulnerability of sensitive resources and environmental receptors in the path of a potential spill. While the modeling analyses show potential on-water concentrations and shoreline distribution of oil, it does not evaluate the potential consequences of oil reaching these areas. A consequence analysis typically assigns some weight to oil spill vulnerabilities in order to consider the potential consequences of a worst case oil spill and develop mitigation measures intended to minimize or prevent such adverse impacts.

Response T8-157

As discussed in the Master Response for Environmental Health and Safety Analysis, the analysis of potential environmental health and safety impacts looks at the relative risks for a set of release scenarios that could occur as the result of terminal operations and rail and vessel transport associated with the proposed action. Appendix M, *Risk Assessment Technical Report,* and Appendix N, Oil Spill Modeling, do not predict precise spill sizes or locations where spills might occur. This approach provides decision-makers and planners with a range of potential outcomes related to the proposed action to help them understand potential risks and propose targeted mitigation measures. By extension, the Draft EIS does not predict the specific consequences that would affect individual resource areas or populations along rail and vessels transportation corridors with any single release scenario. Rather, Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident occurs. Refer to Master Response Oil Spill Modeling Methods for additional information about the approach to, input assumptions for, and limitations of the oil spill modeling.

Comment T8-158

Gaps in Vessel Traffic Analyses

Each DEIS discusses vessel traffic risks and impacts within the body of the respective DEIS, in the joint Risk Assessment Technical Report (Appendix M), and in the heavily cited 2014 WorleyParsons report Vessel Traffic Impact Analysis for Westway and Imperium.

Escort Tug Availability and Capacity

Section 3.17 contains a qualitative discussion of escort tug capacity in Grays Harbor. Three harbor tugs are described as available within Grays Harbor, and their capabilities are described in general terms. The Neah Bay tug, located more than 100 miles away, is also discussed though the DEISs' both concede that the 12-18 hour transit time required for the tug to reach Grays Harbor make it an unlikely asset for most emergency response situations.

The DEIS documents state that the three tugs are sufficient to provide escort and docking assistance according to the proposed mitigation measures for each project, which Section 3.17.7.1 describes as at least one escort tug for laden outbound tank vessels traveling between the Hoquiam River and Grays Harbor entrance and two tugs to assist with docking and undocking. The DEIS documents state that the three tugs are adequate to handle the forecasted increase in vessels for both 2017 and 2037 for each project, but does not clearly describe how those three tugs will be able to provide assistance to meet the increased vessel traffic. Additionally, the Vessel Traffic Impact Analysis for Imperium and Westway (WorleyParsons, 2014) states that the tug fleet in Grays Harbor consists of two, not three tugs.

Chapter 6 discusses the cumulative impact to escort tugs to meet the cumulative increase to 1,082 large commercial vessel transits in 2017 and 1,180 in 2037, inclusive of the three proposed projects and baseline commercial vessel traffic. Text on page 6-47 justifies that three tugs are appropriate to meet the cumulative tank vessel calls, which are stated as 395 in 2017 and 406 in 2037. However, two tugs are required for all large commercial vessels, which means that the existing fleet of two or three tugs will actually be required to accommodate escort and docking/mooring for 1,082 vessels per year in 2017 and 1,180 vessels per year in 2037. The requirement for two tugs to assist with docking/mooring means that it will not be possible to dock and undock more than one large vessel at a time. It is not at all clear how two or three tugs would be able to manage the escort requirements for three or more large commercial vessels per day, particularly given that the tide windows limit the opportunity to transit to and from the terminal.

The DEIS documents also lack any further analysis of tug capabilities and limitations relative to the increased vessel traffic from individual and/or cumulative projects. Additional analysis should be provided to demonstrate that the three existing tugs have sufficient capabilities (bollard pull, horsepower, towlines and winches, etc.) to provide assistance to a fully laden Panamax tanker (largest vessel identified in DEIS). Section 3.17.7.1 states that escort tugs "must have an aggregate shaft horsepower equivalent to at least 5% of the deadweight tons of the escorted oil tanker or tank barge." The tractor tug Wynema Spirit has 3,600 horsepower, which would be adequate to handle a vessel up to 72,000 deadweight tons (Port of Grays Harbor, 2013). However, laden Panamax tankers can weigh up to 80,000 deadweight tons, which would exceed the stated policy. The DEIS does not adequately demonstrate that there is sufficient tug capacity resident in Grays Harbor to handle new tanker traffic.

Section 6.5.6.3 of both DEIS documents lists a number of requirements that would be developed relative to escorting, tethering, and maneuvering laden tank vessels if either or both projects move forward. However, the analysis does not evaluate the appropriateness of the three escort tugs resident in Grays Harbor to implement these requirements. The DEIS analysis should take into account the proposed mitigation measures and re-evaluate the number and capability of tugs required to support the cumulative increase to vessel traffic in Grays Harbor.

Response T8-158

Final EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels*, *Tug Services,* clarifies the capabilities of the tugs currently stationed in Grays Harbor.

Final EIS Chapter 3, Section 3.17.5.2, *Proposed Action*, and Chapter 6, Section 6.5.6.2, *Cumulative Impacts*, provide additional information to clarify tug needs in Grays Harbor with the proposed action and cumulative projects, respectively, and to further qualify existing tug capacity to support projected commercial vessel traffic.

Comment T8-159

Vessel Traffic Management

In Sections 3.17.7.1 and 6.5.6.3 of both DEIS documents, the list of mitigation measures include a commitment to "work with the U.S. Coast Guard, Ecology, Port of Grays Harbor, and Grays Harbor Safety Committee to propose, develop, and implement a formal vessel management system...[which] will include the ability to schedule, track, and monitor vessel movements in the harbor and off the entrance to the harbor." The DEIS indicates that this system would be up and running before commencing operations. However, it does not specify how this system would be designed, implemented, or funded. Establishing a vessel management system will include both capital and operating costs- would these be borne and sustained by Westway and Imperium? Would regulatory action be required for the U.S. Coast Guard to establish a vessel management system for Grays Harbor?

Mitigation measures described in these sections also indicate that deep draft vessel traffic will be prohibited within the south channel to Terminal 1 in both directions when a laden tank vessel is transiting within the same channel. There is no analysis provided to demonstrate that this is feasible in the context of roughly 1,100 large commercial vessel transits per year given the tidal draft restrictions.

Response T8-159

The vessel management system identified in the referenced mitigation measure could be developed in different ways. How it is operated would depend on what form it takes. The regulatory expertise and responsibilities of the groups identified in the mitigation measure would apply. Final EIS Chapter 3, Section 3.17.7.1, *Applicant Mitigation*, and Chapter 4, Section 4.6.3.1, *Applicant Mitigation*, have been revised to propose the funding responsibility of the applicant for this mitigation measure. In addition, the measure has been revised to reflect new Washington State legislation in RCW 88.16.

Comment T8-160

Vessel Traffic Projections

Throughout the DEIS, future vessel traffic projections are presented for 2017 and 2037. However, the Vessel Traffic Impact Analysis for Imperium and Westway presents vessel traffic projections for 2030. The reason for this discrepancy is not explained in the DEIS documents.

The vessel traffic increase projections are derived from a number of assumptions about the size and type of vessels that may visit the terminal. The DEIS state that vessel traffic projections are based on barge trips, because these result in the highest number of transits. However, they appear to use a relatively large tank barge to estimate the number of trips (6.3 million gallon capacity). If this was a smaller capacity barge, then the number of trips to transport the annual throughput would be even higher. For example, if the barges were all 1.05 million gallons rather than 6.3, then the number of transits would be roughly 6 times higher than shown in the DEIS.

The historic vessel movement data for Grays Harbor (Table 3.17-6) shows that tankers are used more frequently than tank barges; it is unclear whether this is meant to suggest that the proposed expansion projects would shift to the use of barges rather than tankers. A more explicit projection for the makeup of the vessel fleet that would transport oil from these terminals would inform a better understanding of overall vessel transit risks.

Response T8-160

The Vessel Traffic Impact Analysis for Imperium and Westway, referred to by the commenter, was prepared by WorleyParsons for the applicant and Imperium Terminal Services prior to the development of the Draft EIS. As noted in the revisions to Final EIS Chapter 3, Section 3.0, *Introduction*, the analysis considers the potential for impacts over the lifetime of the proposed facilities. For impacts that are quantitatively evaluated, the analysis considers the potential for impacts in 2017 and in 2037, starting with the anticipated first year of operation and continuing through a representative analysis period. This approach provides context to decision-makers about how the impacts of operations would evolve over a reasonably foreseeable period. This is particularly relevant for transportation- and risk-related impacts, which can evolve over time because of reasonably foreseeable increased growth, planned infrastructure changes, and phased regulatory requirements for improved transportation efficiency and safety.

As stated in Draft EIS Chapter 3, Section 3.17.5.2, *Proposed Actions, Operations*, the Crowley 550-Class tank barge is assumed in the analysis, because it would result in the most vessel trips and would be the vessel most likely used under current channel conditions.

Refer to Master Response for Vessel Traffic Baseline and Projections for more information on the development of the vessel traffic projections used in the Draft EIS.

Comment T8-161

Lack of Consideration for Marine Oil Spill Response Capability and Limitations

The DEIS documents do not address oil spill response planning at all. However, the modeled oil spills presented in Appendix N make it clear that swift response is essential to avoid oil reaching shorelines within the first 24-48 hours of a release.

Without a clear understanding of overall response capacity- what can and cannot be done to contain and recover an oil spill before it impacts wildlife and the environment - it is impossible to evaluate the risks associated with increasing the potential for spills to occur. Effective oil spill contingency planning requires that factors within the control of responders- such as how the resources will be configured, having enough adequately trained responders on-scene, and ensuring a timely response- are understood ahead of time and any gaps filled through acquisition of additional equipment, personnel, or training. The times when weather conditions impede or preclude an on-water response- referred to as a “response gap” - is also a critical component to evaluating the potential consequences of a marine oil spill.

Response T8-161

Draft EIS Chapter 4, Section 4.2.1, *What framework prevents incidents from happening?* describes the formalized planning framework in place to address risks related to oil spills, fires, or explosions from the terminal operations, rail transport, or vessel transport. The responsible party may vary during the transport of crude oil. This section describes the requirements for planning and preventive equipment and design. Section 4.2.2, *What framework prepares for an incident?* describes federal and state regulations to prepare for an incident, the integration of plans, and drill and exercise requirements.

Draft EIS Chapter 4, Section 4.2.2, *What framework prepares for an incident?* describes the formalized planning framework in place to address risks related to oil spills, fires, and explosions. As

noted in this section, the applicant would be required to develop various emergency response plans consistent with federal and state requirements. Final EIS Section 4.4.2.1, *Oil Spills*, and Section 4.4.2.2, *Explosions*, have been revised to include information about the specific plans required of the applicant prior to beginning operations. As required by federal and state laws, these plans will meet all applicable standards as enforced by the appropriate regulatory agency.

Final EIS Section 4.2.3, *What framework provides responses to an incident?* has also been updated to better reflect existing response capabilities and resources in the study area, including information identifying existing gaps from the Marine and Rail Oil Transport Study (Ecology 2015). Final EIS Section 4.7, *Impacts on Resources,* has been updated to better reflect how the proposed action could affect emergency service responses.

Final EIS Chapter 4, Sections 4.4.3, 4.5.3, and 4.6.3 reflect additional mitigation measures to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

Chapter 4 also identifies other proposed measures that can be implemented to ensure broader prevention, preparedness, and response planning involves the appropriate stakeholders and that updates to any plans applicable to reducing risks related to the proposed action contain appropriate applicant information and participation. To the extent possible, measures addressing the need for more coordinated and focused planning include the role of the applicants as appropriate. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about how the Draft EIS approaches the analysis of emergency planning and response capabilities.

Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7 describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment T8-162

Resident Oil Spill Response Capacity

The significant increase in potential spill frequencies described in the DEIS should warrant a critical examination of the capacity of oil spill response resources available to respond to a Grays Harbor area spill. This may include a combination of locally-based resources and those that could be mobilized from other parts of the state. It is a recognized industry best practice to "evaluate the resources currently available to the operation at each tier, including the times for their mobilization and deployment within the theatre of response operations ...This enables gap analyses to be carried out to identify whether the existing resources and their associated logistics are adequate, or whether they require alterations or expansion." (IPIECA, 2013)

Studies conducted for San Juan County, Washington (Nuka Research, 2015) and the Province of British Columbia (Nuka Research, 2013) provide examples of response capacity analyses that model the maximum capacity of a combination of oil spill response resources to actually recover oil under optimal circumstances. Similar approaches have been used to evaluate response systems in Norway (Eckroth et al., 2015). These analyses consider factors such as the type and recovery efficiency of

skimmers, swath width of the boom used, vessel speed, time to mobilize and arrive on scene, primary and secondary storage capacity, and basic oil weathering processes. The outcome of the model is an optimistic estimate of how much oil could be recovered if all systems are able to deploy immediately and operate perfectly. This information can be compared to potential oil outflow estimates. The potential benefits achieved from making modifications to the system can also be quantified.

Applying a response capacity analysis to one or more spill locations along the marine shipping route out of Gray's Harbor would significantly enhance our understanding of the extent to which the available resources could be expected to be used in an effective spill response.

Response T8-162

As discussed in the Master Response for Environmental Health and Safety Analysis, the analysis of potential environmental health and safety impacts looks at the relative risks for a set of release scenarios that could occur as the result of terminal operations and rail and vessel transport associated with the proposed action. Appendix M, *Risk Assessment Technical Report,* and Appendix N, *Oil Spill Modeling*, do not predict precise spill sizes or locations where spills might occur. This approach provides decision-makers and planners with a range of potential outcomes related to the proposed action to help them understand potential risks and propose targeted mitigation measures. Refer to the Master Response for Oil Spill Modeling Methods for additional information about the approach to, input assumptions for, and limitations of the oil spill modeling.

By extension, the Draft EIS does not predict the consequences that would affect individual resource areas or populations along rail and vessels transportation corridors with any single release scenario and therefore, does not include a detailed evaluation of response capabilities for any one potential outcome or jurisdiction. Rather, as discussed in the Master Response for Emergency Response and Planning Gaps Evaluation, Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, provides a discussion of the overall framework in place to prevent, plan for, and respond to an oil spill, fire, or explosion.

As noted in Section 4.2.3, *What framework prepares for responses to an incident?* the framework for responding to an incident is a well-established and coordinated system formalized at the national, regional, state, and facility level. Depending on the size of the release, the location, and specific circumstances of the incident, the response efforts and parties involved can vary. However, local and state fire, police, or emergency responders are likely to be the first responders to an incident, regardless of the location. As noted in Section 4.2.3, within the study area, local first responders do not have the appropriate equipment for initial responses to large fires, explosions, or spills. This information was based on discussions with local emergency service responders. Additional information has been added to Final EIS Sections 4.4, 4.5, and 4.6 to characterize emergency response capabilities of local first responders near the project site, along the PS&P rail line, and around Grays Harbor, respectively.

To address gaps at the local level, Draft EIS Sections 4.4.3, 4.5.3, and 4.6.3, included applicant measures that propose placing response equipment at key points in the study area and establishing formalized notification protocols at the local level in case of an incident. Additional applicant measures have been proposed in the Final EIS based on further coordination with local emergency response officials. These measures include the provision of additional fire-fighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

Comment T8-163

Potential Oil Spill Response Gaps

The concept of an oil spill response gap has been applied with increasing frequency as an analytic tool to evaluate the potential for local environmental conditions to impede or prevent effective deployment of oil spill response equipment and tactics. Response gap analyses inform the oil spill risk assessment, planning, and mitigation process by showing how conditions such as wind, waves, temperature, visibility, and daylight may impact the ability to contain and recover an oil spill at a given location. Response gap analyses have been performed for: the Strait of Juan de Fuca; the Beaufort, Chukchi, and Barents Seas; Prince William Sound, Alaska; and parts of British Columbia (Nuka Research, 2007; 2008; SL Ross, 2011; Nuka Research 2012; 2013; 20014a; 2014b; DNV, 2014).

The DEIS notes that Grays Harbor experiences challenging weather and navigational conditions, including strong and erratic currents, limited visibility due to fog, rain, or darkness, and hazardous, breaking waves. These conditions have the potential to impede or prevent effective marine oil spill response operations for periods of time, creating the potential that an oil spill occurring during such times could have unmitigated impacts.

Conclusion

After reviewing the DEIS documents, it is our opinion as practitioners of oil spill risk assessment, planning, and response that the proposed expansion at Westway and Imperium will result in an increase to the risk of oil spills that would adversely impact Grays Harbor. The proposals would increase the volume of vessel traffic and rail car movements, which logically will increase the potential for an oil spill to occur. The proposed expansion projects also introduce the possibility for new types of petroleum products to move by train and marine vessel through the area, creating new risks that do not currently exist. Potential oil spills from these projects span a range of petroleum products with the potential to have significant adverse impacts to wildlife, habitat, and human health and safety. The DEIS does not adequately analyze or describe the potential risks because it segments risks in a way that does not capture the potential for any type of spill to adversely impact the environment. The DEIS does not present a clear and comprehensive evaluation of oil spill risks, because it understates cumulative oil spill risks and lacks an oil spill consequence analysis.

Response T8-163

As noted previously, and discussed in the Master Response for Environmental Health and Safety and based on the risk assessment in Draft EIS Appendix M, *Risk Assessment Technical Report*, the analysis of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, evaluates the likelihood of different spill sizes associated with terminal (onsite) operations, rail transportation, and vessel transportation separately. The risks across these operations are not combined in the Draft EIS because of differing regulatory and design requirements described in Chapter 4, because the cause of an incident involving the facility or rail or vessel transport would likely be different, and because the proposed facility, rail line, and vessel transport corridor are physically separated.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and

vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Section 4.7 also acknowledges resources that could be adversely affected in the event of an oil spill, fire, or explosion in the study area. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment T8-164

References

Congressional Research Service (CRS). (2014). Crude Oil Properties Relevant to Rail Transport Safety: In Brief. Febrary 18. CRS Report 7-5700/R4340 1. Retrieved from https://www .hsdl.org/?view&did=751 042

Det Norske Veritas (DNV). (2014). Anchoring the future: Challenges and best practice of oil spill response in the Arctic. Report No. 013-162, Rev 1. DNV GL Oil and Gas Risk Management Section.
Nuka Research and Planning Group, LLC. (2007). Response gap estimate for two operating areas in Prince William Sound, Alaska. Report to Prince William Sound Regional Citizens' Advisory Council. Valdez, AK. Retrieved from http://www.pwsrcac.org/w_:content/uploads/filebase/programs/oil_spill_response_operations/oil _spill_response_gap/mechanical_response_gap_estimates.pdf

Eckroth, J.R., M.M. Madsen, and E. Hoell. (2015). Dynamic modeling of oil spill cleanup operations. Proceedings of the Thirty-Eigth AMOP Technical Seminar, Environment Canada, Ottawa, ON, pp. 16-35.

ExxonMobil. (2015). Crude Oil Information by API Gravity. Retrieved from

http://www.exxonmobil.com/crudeoil/about crudes api.aspx

International Association of Oil & Gas Producers (IPIECA). (2013). Oil spill risk assessment and response planning for offshore installations. Final Report to Joint Industry Project. London, UK. Retrieved from http://oilspillresponseproject.org/sites/default/files/uploads/PP%206%20-%200il %20spill %20risk%20assessment.pdf

Nuka Research and Planning Group, LLC. (2008). Non-mechanical response gap estimate for two operating areas of Prince William Sound. Report to Prince William Sound Regional Citizens' Advisory Council. Valdez, AK. Retrieved from http://www.pwsrcac.org/wp-content/uploads/filebase/programs/oil spill response operations/oil spill response gap/2008 non-mechanical response gap estimate.pdf

Nuka Research and Planning Group, LLC. (2012). Analysis of oil spill response capacity for Strait of Juan de Fuca and Cape Flattery, Washington. Report to Makah Tribal Council. Retrieved from http://www.ecy.wa.qov/programs/spills/preparedness/cpls.n/MakahCombinedComments.pdf

Nuka Research and Planning Group, LLC. (2013). West Coast spill response study, Volume 1: Assessment of British Columbia marine oil spill prevention and response regime. Report to the British Columbia Ministry of Environment. Retrieved from http://www.env.qov.bc.ca/mainlwest-coast-spill-response-study/docs/WestCoastSpillResponse_Vol1_InitialAssessment_130717.pdf

Nuka Research and Planning Group, LLC. (2014a). Impact of environmental conditions on vessel incident response in the Aleutian Islands: A response gap analysis. Report to Aleutian Islands Risk Assessment Advisory Panel & Management Team. Retrieved from http://www.aleutianriskassessment.com/files/140205AIRA_ResponseGapAnalvsis_vFlr.pdf

Nuka Research and Planning Group, LLC. (2014b). Estimating an oil spill response gap for the US Arctic Ocean. Contract #El3PC00024. Report to Bureau of Safety and Environmental Enforcement. Retrieved from http://www.nukaresearch.com/files/140910_Arctic_RGA_Report_FNL.pdf

Nuka Research and Planning Group, LLC. (2015). San Juan county oil spill response capacity evaluation. Report to San Juan County. Retrieved from: http://www.nukaresearch.com/images/150630_5JC_Oil_Spill_Evaluation_FINAL_w_APPENDICES.pdf

The Port of Grays Harbor. (2013). Brusco Tug & Barge's Wynema Spirit to enhance safety on Grays Harbor. Aberdeen, Washington. Website. Retrieved from: http://www.portofgraysharbor.com/news/2013/Brusco-Tuq.php

S.L. Ross Environmental Research Limited. (2011). Spill response gap study for the Canadian Beaufort Sea and Canadian Davis Strait. Contract No. 110027. Submitted to National Energy Board. Retrieved from https://docs.neb-one.qc.ca/ll-enq/lllisapi.dll/fetch/2000/90463/621169/700096/702787/A2A6VO_-_SL_Ross_Environmetal_Research_Limited_-_Spill_Response_Gap_Study_for_the_Canadian_Beaufort_Sea_and_the_Canadian_Davis_Strait.pdf?noeid=702903&vernum=-2

Response T8-164

Referenced bibliography acknowledged.

Comment T8-165

EXHIBIT2

Report and Comments on Westway and Imperium Draft Environmental Impact Statements

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I. INTRODUCTION AND BACKGROUND

I am a policy analyst, researcher, educator, and consultant with more than three decades of experience assessing the risks associated with transporting hazardous materials. Over the course of

my career, I have advised governmental legislative and regulatory bodies, national chemical and oil worker and rail unions, insurance companies, fire service associations, citizen organizations, and environmental groups on the unique health and safety hazards of shipping hazardous materials by rail, including crude oil. I have testified before both houses of the United States Congress, have presented as an invited lecturer in twelve countries on chemical facility and chemical transportation accident prevention, and have provided testimony and comments on specific projects involving crude-by-rail risks. I have provided specific analyses of risks associated with transporting crude oil by rail in and around cities across the United States, including Albany, New York; Washington, D.C.; and the San Francisco Bay Area. My CV is attached to this report.

I am familiar with much of the legislative and regulatory efforts in North America following Lac Megantic and several other major crude-by-rail accidents, and I have submitted comments to the U.S. Department of Transportation on their ongoing rulemaking on High Hazard Flammable Trains. I have reviewed Draft Environmental Impact Reports and accompanying documentation in other jurisdictions with similar proposed projects for crude oil railcar unloading facilities. For example, I submitted critical comments on an environmental impact report prepared for a crude-by-rail project at the Valero Benicia refinery in California. I have also provided expert written and oral testimony concerning the hazards and safety concerns of a proposal by Shell Refinery in Anacortes, Washington to build a crude-by-rail facility.

In preparation of this report, I have reviewed the relevant sections on dealing with rail safety issues of the Westway Project Draft Environmental Impact Statement ["the DEIS"] August 2015, including:

- Executive Summary
- Chapter 4, Environmental Health and Safety
- Chapter 5, Extended Rail and Vessel Transport
- Chapter 6, Cumulative Impacts
- Appendix M, Risk Assessment Technical Report - serving for both the Westway and Imperium projects

II. SUMMARY OF DEIS FLAWS

- The DEIS has not Adequately Considered Potential Major CBR Derailment Hazard Events.

The DEIS did not analyze shipper or carrier worst case scenarios, use available public domain models to estimate potential consequences, or summarize recent federal reports of ranges of expected CBR accident consequences. The DEIS makes only a brief and pro forma acknowledgement of significant risks from CBR oil spills and fire/explosion events. Beyond this statement, the DEIS lacks any substantive discussion or focus on the consequences to human health and safety of potentially serious CBR releases, either on the PS&P line or in the extended BNSF rail haul, largely viewing these as "unavoidable and significant adverse impacts" not amenable to mitigation.

Response T8-165

The Master Response for Environmental Health and Safety Analysis addresses the relative risks for a set of release scenarios that could occur as the result of terminal operations and rail and vessel transport associated with the proposed action. The risk assessment in Appendix M, *Risk Assessment Technical Report,* does not predict precise locations or spill sizes where spills might occur. This approach was used to help decision-makers and planners understand the risks of concern to

propose targeted mitigation measures. By extension, the Draft EIS does not predict the specific consequences that would affect individual resource areas or populations along rail and vessels transportation corridors with any single release scenario. Rather, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident were to occur.

All the release scenarios considered in the risk assessment were developed in accordance with applicable regulatory requirements and based on project-specific information. To that end, worst-case release volumes were considered consistent with WAC 173-182-030 and WAC 480-62-300 as discussed in the Master Response for Environmental Health and Safety Analysis.

Additionally, some risks related to the proposed action would remain even with the implementation of the proposed mitigation measures. As noted in Chapter 4, Sections 4.4.4, 4.5.4, and 4.6.4, no mitigation measures would completely eliminate the possibility of a spill, fire, or explosion, nor would they completely eliminate the adverse consequences of a spill, fire, or explosion. Refer to the Master Response for Geographic Scope of the EIS for additional information about the analysis of impacts associated with rail transportation along the PS&P rail line and beyond.

Draft EIS Chapter 4, *Environmental Health and Safety*, acknowledges that the analysis presented in Appendix M and summarized in Section 4.5, *Environmental Health Risks—Rail Transport* , relied on 2014 Federal Railroad Administration data to determine the appropriate accident rates for rail-related incidents. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-166

- The DEIS Significantly Underestimates the Likelihood of Significant Human Health and Safety Impacts from CBR Derailments.

The DEIS relies heavily on an unsubstantiated model of Probabilistic Risk Analysis without considering both the well-known multiple uncertainties in these models. Nor does the DEIS analyze or take into account the unique risks posed by crude oil unit trains.

Response T8-166

Draft EIS Appendix M, *Risk Assessment Technical Report*, explains the methods used in the analysis of risks. As noted in the appendix and discussed in the Master Response for Environmental Health and Safety Analysis, the approach used to analyze risks was based on evaluation of a selected set of scenarios. While the approach used in the Draft EIS is similar to more detailed risk assessments noted in the comment, this approach was not selected with the intent of predicting when or where an incident would occur and the detailed assessment of resulting consequences. As such, it is not a quantitative or probabilistic risk assessment. By extension, the Draft EIS does not predict the specific consequences that would affect individual resource areas or populations along rail and vessels transportation corridors. Rather, Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts that are expected if an incident were to occur. Final EIS Section 4.7 has been revised to more fully describe the potential impacts on human health. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-167

- The DEIS Fails to Consider Local Route and Infrastructure Conditions.

The DEIS explicitly declines to discuss even in some "semi-quantitative" way either the local infrastructure conditions along either rail line studied or any release consequence impacts that might be expected from conditions of the infrastructure in specific localities along the studied rail lines.

The DEIS produces no detailed study of characteristics of and vulnerabilities to specific parts of the routes. The DEIS characterizes risk in the abstract, based on accident rates history for the whole PS&P rail line and by national rail accident history. The DEIS takes no look at specific vulnerabilities for fire and explosion damage in specific segments of either of the studied routes [PS&P and BNSF].

Response T8-167

As noted above, Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Because the analysis is not a quantitative risk assessment, it does not include weightings for different factors except where they are explicitly captured in available data—such as the track class for rail operations or the type of waterway for vessel operations.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment T8-168

- The DEIS Relies on Non-Transparent and Rail Industry Data and Models Likely to be Biased.

In Appendix M, the DEIS relies heavily on rail industry risk models and on a probability study based on industry data by researchers at the University of Illinois Urbana Champagne [Liu et al2014].

Throughout the Appendix M Technical Report, there are repeated instances of its explicit blending of various kinds of data and analyses in unexplained ways, usually with no assumptions provided as to how any weighting of various factors has been made, and with no explicit admission that there is a huge potential for sweeping and unaccountable "engineering judgment" having been exercised, as opposed to relying on defensible research sources and available data in the public domain.

Given the lack of transparency in the DEIS's reports of its probability analysis, it is impossible to discern whether or how the DEIS has weighted some risk factors more heavily than others in assessing the probability of hazardous impact.

Response T8-168

Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*, use the latest data available on relevant accident and failure rates, citing the final values applied. Because the analysis is not a quantitative risk assessment, it does not include weightings for different factors except where they are explicitly captured in available data—such as the track class for rail operations or the type of waterway for vessel operations.

Comment T8-169

- The DEIS Uses Non-relevant Data.

The DEIS is not clear just what ranges of historical data it used to make estimates of rail accident rates. When it cites FRA data, it does not clarify what the historical time range of that data is, either for PS&P lines or for Class 2 track nationwide. Since FRA's historical accident data is often lauded by federal and industry researchers as a uniquely valuable 30- year database, the DEIS may have used FRA rail accident data based on U.S. train operations from years prior to the sudden recent oil shipper/rail carrier introduction of transcontinental unit train CBR operations around 2012.

Response T8-169

Draft EIS Appendix M, Section 4.2.2, *Accident Rates,* states that the determination of the chance of derailment or collision (accident rate) is derived from Federal Railroad Administration data finalized through October 2014. Train accident rates were collected from all operations on Class 2 track nationwide, both for mainline operations and for all track including main lines, industry tracks, yards, and sidings. The same data were collected specific to the PS&P rail line. Although PS&P accidents rates through 2014 are roughly ten times the national average, at 2.2E-5 per train mile, with the changes made by PS&P since the accidents in April and May 2014, and assuming the improvements that PS&P has planned prior to implementation of the proposed actions, a long-term rate of 1E-5 per train mile was applied in this analysis. This is still higher than the national average for accidents.

Comment T8-170

- The DEIS Relies on the Efficacy of Existing and Future Rail Safety Regulations.

The DEIS displays, even in discussing the extended transport risks on BNSF lines, no serious acknowledgment of the kinds of human error and operational failures that might cause CBR disasters along the studied lines. Current regulations on routing, track class, and speed are presumed appropriate, and complacently left un-analyzed: "...the train control system ensures safety by managing rail traffic through signaling systems."

Response T8-170

As noted in Draft EIS Appendix M, Section 3.2, *Approach and Data*, the selected sources consider all causes of failure, including construction defects, natural hazards, human error, and material failures. Considering the intent of the risk assessment is to inform decision makers and planners, as opposed to final technical designs, these sources were considered appropriate for the Draft EIS. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-171

The DEIS fails to describe or analyze the existing baseline status of human health and safety and environmental risks and capabilities along the covered rail lines. And the DEIS should have included both railroads' current baseline information not only on CBR accident worst case scenarios, but also on railroads' [admittedly inadequate] insurance coverage, emergency response plans, and [for both high-risk hazmat and CBR cargoes] route analyses and routing decisions.

The DEIS fails to analyze gaps in regulations at federal, state, and local levels which have historically proven to provide inadequate CBR accident prevention and preparedness protection.

Response T8-171

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion, and has been revised to more fully describe potential impacts on human health.

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information. Refer to the Master Response for the Geographic Scope of the EIS for information about the scope and approach to the analysis of impacts in the extended study area, including the BNSF mainline.

Comment T8-172

The DEIS uncritically relies on presumed safety improvement impacts from assumed future railroad and shipper compliance with the 2015 final federal regulations for oil trains. The DEIS includes no acknowledgement of the significant delays in the deadlines provided for compliance and the lack of relevant CBR experience to underpin confidence that even the incremental operational and tank car changes mandated by the new regulations will yield significant safety gains.

Response T8-172

As noted in the Master Response for Baseline and No-Action Alternative, the Draft EIS considers the potential for reasonably foreseeable changes that would occur unrelated to the proposed action, including planned infrastructure improvements on the PS&P rail line and regulatory requirements for improved rail tank car design. The specific assumptions relevant to the rail traffic and safety analyses are described in Draft EIS Section 3.15, *Rail Traffic*, and Appendix M, *Risk Assessment Technical Report*.

Comment T8-173

- The Mitigation Measured Proposed in the DEIS are Inadequate.

The DEIS proposed mitigation measures are skewed towards emergency response versus prevention, and make no enforceable demands on railroads or shippers to expand their capabilities for preventing and responding to derailment impacts which the DEIS considers "unavoidable and significant adverse impacts."

Regarding rail haul safety issues: the DEIS mitigation measures make no demands on railroads or shippers and rely on anticipated safety improvements based on presumed railroad compliance with future federal regulatory deadlines.

Response T8-173

Draft EIS Chapter 4, Section 4.2.1, *What framework prevents incidents from happening?* states that the existing prevention framework consists primarily of operations implemented by the responsible party (facility, rail, or vessel operators) or design features or standards that are regulated by the appropriate government agency. Final EIS Chapter 4 reflects new consideration of evolving state and federal legislation aimed at improving the safety of crude oil by rail. As noted in Section 4.2.3, *What framework prepares for responses to an incident?* the framework for responding to an incident is well established and coordinated at the national, regional, state, and facility level. Both prevention and emergency response measures require participation and coordination with broader group of stakeholders to be successful.

To the extent feasible within the framework described in the Master Response for Mitigation Framework, the Final EIS has been revised to propose mitigation measures aimed at addressing emergency prevention, preparedness, and response planning gaps. Refer to the Master Response for Mitigation Framework for additional information about special considerations related to the State's authority to set operations or safety standards on the railroad.

Refer to the Master Response for Baseline and No-Action Alternative for additional information on how the Draft EIS considers the potential for reasonably foreseeable changes that would occur unrelated to the proposed action, including planned infrastructure improvements on the PS&P rail line and regulatory requirements for improved rail tank car design. The specific assumptions relevant to the rail traffic and safety analyses are described in Draft EIS Section 3.15, *Rail Traffic*, and Appendix M, *Risk Assessment Technical Report*.

Comment T8-174

III. HEALTH AND SAFETY IMPACTS OF SHIPPING HAZARDOUS CRUDE BY RAIL

My discussion throughout focuses on the current widely used CBR unit train practice in rail operations in which already observed derailment/release events have highlighted the increased risks of long and heavy trains and the potential for multi-car releases and huge fire events and explosions, sometimes lasting days. The respected US DOT Emergency Response Guidebook, in Guide Number 128, has long outlined in brief the hazards of flammable railcars [crude oil and ethanol in separate guides because different fire suppression measures are needed] and directed first responders, if even one flammables rail car is involved in a fire, to evacuate at-risk citizens and to back off one-half mile. *[Footnote: http: 1/phmsa.dot.gov/hazmat/library/erg.]*

The DEIS has not considered the potential major CBR derailment hazard events thoroughly, only briefly listing some of the major CBR derailments that have aroused great concern, and providing a very brief discussion [p. 4.5-10] of possible fire and explosion releases as causing damages that can vary depending on several factors. The DEIS throughout in general dismisses these releases as low-frequency [cf. e.g., Appendix M, p. 6-2].

Response T8-174

For the reasons noted in the Master Response for Geographic Scope of the EIS, no detailed analysis was completed for the area beyond the PS&P rail line. The results presented in the Draft EIS are not directly comparable with studies that evaluate risks outside this area; for example, on the BNSF main line. However, as discussed in the Master Response for Risk Assessment Methods, data sources uses in the risk assessment did consider these types of events.

Final EIS, Chapter 4, *Environmental Health and Safety,* acknowledges that the consequences associated with these events would be potentially significant.

Comment T8-175

The most important root failure of the DEIS is to significantly underestimate the likelihood of significant human health and safety impacts from CBR derailments along the studied routes. For example, the DEIS predicts, with a very non-transparent methodology of dubious validity [see Part II of this report for a critique], that ''the overall additional chance of an accident per mile per year for 2017 conditions is once per 440 years for loaded [CBR] trains and once per 217 years for the combination of loaded and unloaded trains for Westway." [Appendix M, p. 6-2.]

Response T8-175

Final EIS Section 4.7, *Impacts on Resources*, has been revised to more fully describe potential impacts on human health. The approach to the risk assessment was to assess the likelihood of different spill scenarios occurring rather than predicting specific outcomes that may occur as the result of the proposed action. By extension, the Draft EIS does not predict the specific consequences that would affect individual resource areas or populations along rail and vessels transportation corridors with any single release scenario. Rather, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident were to occur, including the types of impacts that could affect human health. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-176

The DEIS Table 5 in Appendix M [p. 4-5], based in a non-transparent way on national accident data and industry modeling and with some attention to recent CBR release history, **shows generically, in CBR derailments, vanishingly small calculated probabilities of different CBR release sizes**, e.g., for the five-rail car collision/derailment down to 0.0015 for 2017 operations and 0.00066 for 2037 operations [with better tank car assumed for 2037]. For the "extreme collision/derailment lead[ing] to release equivalent to 15-30 rail cars," the calculated probability is 0.0001 in 2017 operations and 0.00005 for 2037 operations. [30 railcars could release 900,000 gallons.]

Response T8-176

The commenter is correct that the risk assessment found that large-scale events involving the release of multiple rail cars were generally relatively infrequent. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-177

The DEIS says this means that, based on national accident rate data, for the proposed Westway project, "larger" five-rail car accidental releases are predicted as extremely unlikely, with the improved tank cars in 2037, once every 11,000 years, and ''the most extreme" accidental release would occur only once every 73,000 years in 2017 with the current tank cars and once every 150,000 years in 2037. *[Footnote: Under the proposed actions, the chance of an accident resulting in the various release scenarios ranges from once every 98 (Westway) or 62 (Imperium) years for the smallest release (1,000 gallons) to once every 4,800 (Westway) or 3,000 (Imperium) years for the larger releases (e.g., 150,000 gallons). With the improvements in rail cars, these chances drop to roughly once every 105 (Westway) or 66 (Imperium) years and once every 11,000 (Westway) or 7,000 (Imperium) years, respectively. In addition, a case representative of the most extreme of the recent accidents was modeled. This showed that such an accident might occur within the study area once every 73,000 (Westway) or 46,000 (Imperium) years with the current rail cars, dropping to every 150,000 (Westway) or 93,000 (Imperium) years with the newer rail cars. These are very rough (i.e., higher uncertainty) estimates for the largest spills given the limited data available. [DEIS, Appendix M, p. 4-6}.]*

This conflicts markedly with the estimates of the US DOT regulators in their Draft Regulatory Impact Analysis from May 2014 on High Hazard Flammable Trains [which the DEIS fails to discuss], in which they predict that over the next 20 years, absent significant upgrades in the US regulatory system and rail practices, crude oil and ethanol unit train derailments could be 10 per year, with serious releases occurring as often as once every other year costing $1.2 Billion each, with one giant release event costing up to $6 Billion. And the regulators concluded that even with future implementation of the proposed regulation's new safety measures [designed mainly to reduce not the frequency of CBR derailments but only their severity], the estimated total Societal Cost of $16.7 Billion imposed by accidents with the continued transportation of CBR could be reduced by only a fraction, at most by $2.9 Billion. *[Footnote: US DOT Final Regulatory Impact Analysis, http://www.regulations.gov/#!documentDetail;D=PHMSA-2012-0082-3442. Although we analyze the effects of individual requirements separately, we have taken a system wide approach covering all requirement areas. This approach is designed to mitigate damages of rail accidents involving flammable liquids, though some provisions could also prevent accidents. As a result, this analysis shows that expected damages based on the historical safety record could be $4.1 billion and damages from higher-consequence events could reach $12.6 billion over a 20-year period in the absence of the rule. [DOT Final RIA Executive Summary, pp. 12-13}.]*

Response T8-177

The regulatory impact analysis cited in the comment applies analysis of risks spanning the entire country. For the reasons noted in the Master Response for Geographic Scope of the EIS and Master Response for Risk Assessment Methods, the analysis of risks focuses on the study area that includes the PS&P rail line from Centralia to the project site and Grays Harbor to 3 nautical miles from the

mouth of the harbor. Therefore, the estimates of potential incidents noted in the comment are not directly comparable to the risks presented in the Draft EIS or Appendix M, *Risk Assessment Technical Report*.

Draft EIS, Chapter 4, *Environmental Health and Safety,* also notes that even in consideration of existing and future planned regulatory requirements and the proposed mitigation measures, the possibility of an incident cannot be completely eliminated. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment T8-178

A. The DEIS has also not indicated any Worst Case Scenario ["WCS"l consequences for potential CBR fire and explosion events along the studied rail CBR routes to the unloading facility. in part because the document:

- **Failed to Gather and Analyze** any railroad carrier or oil shipper worst case scenario documents. These are not in the public domain, in part because the railroads have been exempted from the federal laws which would have required them: two post-Bhopal disaster federal Community Right to Know laws and the Comprehensive Emergency Response Plan provision of the Oil Pollution Act of 1990. The WA Fire Chiefs Association has formally asked the CBR railroads for these and other railroad risk documents, as have 29 Minnesota state legislators, the Comptroller of New York State, individual fire chiefs in impacted states, and a handful of new state laws roping CBR railroads within the framework of existing state oil spill prevention regulatory regimes. *[Footnote: [Footnote 4: Some examples of media coverage in North America of various groups' requests for the railroads' own risk information: http://blog.seattlepi.com/seattlepolitics/2015/04/07/seattle-rail-tunnel-unsafe-for-first-responders- in-oil-train-fire/ http:///www.thestar.com/news/gta/2014/11111/rail_carriers_keep_emergency_response_plans secret_from_residents.html http://www.startribune.com/legislators-residents-hold-news-conference-on-oil-train-safety/312198221/.]*

Response T8-178

As discussed in the Master Response for Environmental Health and Safety Analysis, the risk assessment does consider a worst-case spill scenario associated with rail transportation as defined by WAC 480-62-300. As further noted in that master response, the approach to the risk assessment is to consider the chance of different spill scenarios occurring rather than to predict the specific outcomes. By extension, the Draft EIS does not predict the specific impacts on individual resource areas or populations along rail and vessels transportation corridors from any single release scenario. Rather, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident were to occur. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-179

- Failed to Calculate some expected impact consequences for future CBR railcar releases, even using the DEIS' s own outline of representative derailment releases of different sizes, including

one fairly severe one that is approximately 2/3 of the size of the Lac Megantic disaster. The DEIS could have used one of the state-of-the-art hazard assessment software tools available to professionals, e.g., for those compiling annual industry Risk Management Program documents, for Fire Chiefs in pre-planning, and infrequently for consultants to the 4100 Local Emergency Planning Committees doing community hazard assessments. One of these software tools in the public domain is "CAMEO," Computer Assisted Management of Emergency Operations, developed by the US National Oceanic and Atmospheric Administration, which can indicate and vividly map Offsite Consequence Assessment impacts from hazardous events out to some chosen Level of Concern for fire radiation and blast zone damage. *[Footnote: http://www2.epa.gov/cameo.]*

Response T8-179

As noted in the response to the prior comment, the approach to the risk assessment is to consider the chance of different spill scenarios occurring rather than to predict the specific outcomes. By extension, the Draft EIS does not predict the specific impacts on individual resource areas or populations along rail and vessel transportation corridors with any single release scenario. Rather, Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident were to occur.

However, as previously noted, the risk assessment does consider worst-case releases during rail transport consistent with applicable regulatory requirements and as informed by project-specific conditions (e.g., track class and speed limits). Environmental impacts were considered in general. Air modeling would be part of the planning and response actions. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-180

- Did Not Summarize the discussion in the recent federal regulatory reports associated with the US DOT High Hazard Flammable Train ["IDIFT"], which includes crude and ethanol unit trains, Final Rule, May 8, 2015. Those federal reports, especially the May 2014 Draft Regulatory Impact Analysis, provide significant multi-billion dollar Societal Impacts calculations of disaster impacts over 20 years from potential future HHFT derailments. The US DOT assessment methodology involved attempting to extrapolate the fatality and property damage results of the Lac-Megantic disaster to the overall US rail system, using national average rail side population data that could even under estimate damages in major cities. DOT predictions estimated future damages in CBR derailments up to $1.2 Billion each and even to $6 Billion for a major event in some densely populated or environmentally sensitive area. *[Footnote: See note 3 above.]*

Response T8-180

For the reasons noted in the Master Response for Geographic Scope of the EIS, no detailed analysis was completed for the area beyond the PS&P rail line. The results presented in the Draft EIS are not directly comparable with studies that evaluate risks outside this area, such as the one referenced in the comment. As discussed in Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, transportation factors outside this study area contain a different set of conditions that can greatly influence the results limiting the utility of direct comparisons. Information on the social costs of incidents has been added to Final EIS Chapter 7.

Comment T8-181

- Did Not Summarize the estimates of casualties calculated in the recent US Federal Emergency Management Agency's first CBR tabletop exercise in Jersey City, NJ, which provided vivid maps illustrating some fire, explosion and toxic smoke plume impacts in impact zones around the hypothetical CBR derailment site on elevated tracks in a densely populated city. *[Footnote: FEMA's NJ CBR exercise slides 27-28 have overlay maps of CBR derailment consequences in Jersey City:http://www.nj.com/hudson/index.ssf/2015/03/jersey_city_hosts_workshop_with_fema_homeland_secu.html.]*

Response T8-181

Draft EIS, Chapter 4, *Environmental Health and Safety*, includes a discussion of recent rail-related incidents to provide context for types of consequences that have occurred in other parts of the United States. However, as noted in the Master Response for Risk Assessment Methods, the risk assessment addressed risks specific to the PS&P rail line and the results are not directly comparable to studies that evaluate risks outside this area; for example, on the BNSF main line or in different states. Refer to that master response for additional information about how large-scale rail incidents, including those that have recently occurred, have been factored into the risk assessment.

Comment T8-182

IV. CRITIQUE OF THE WESTWAY DEIS'S DISCUSSION OF THE HAZARDOUS IMPACTS OF THIS PROJECT, INCLUDING THE DEIS'S RISK ANALYSIS OF THE PROBABILITIES OF CRUDE BY RAIL ACCIDENTS ALONG THE STUDIED ROUTES

A. The overall approach of the DEIS is seriously flawed.

There are gaps in the DEIS's analyses of both the consequences and the probabilities of Crude By Rail ["CBR"] unit train releases along the studied routes [local PS&P and extended BNSF lines]. The DEIS fails to consider multiple important risk factors, and as a result, the DEIS overlooks potentially significant hazardous impacts. [E.g., Appendix M p. 3-2 declines to consider either seismic or tsunami hazards for onsite storage, asserting these have been taken into account in the design of project storage tanks and does not discuss any related rail haul hazards at all.]

To be supportable, any Final EIS would need to discuss CBR risks more broadly, more carefully and transparently, and with less unsubstantiated assertions of certainty than the current probability assessment in **the DEIS Risk Assessment Technical Report Appendix M** ["Appendix M''']. In particular, the FEIS would have to defend the validity and reliability of relying on any specific accident probabilities assessment methodology, given the enormous variety of risk assessment methods available and the well-known significant uncertainties in using such methods.

Response T8-182

As noted in Draft EIS Appendix M, *Risk Assessment Technical Report,* Section 3.2, *Approach and Data*, the selected sources consider all causes of failure, including construction defects, natural hazards, human error, and material failures. Considering the intent of the risk assessment is to inform decision-makers and planners, as opposed to final technical designs, these sources are considered appropriate for the Draft EIS. As noted in the comment, many uncertainties contribute to both the

actual risks and the analysis of those risks. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-183

B. The DEIS's discussion of risk, which relies heavily on Appendix M, the Risk Assessment Technical Report, dated August 2015, is badly skewed in ways that systematically downplay the disaster release risks of the facility.

- In areas where the DEIS risk discussion could have been more certain, in discussing the potential **consequences** of a release, the report is **determinedly vague:** after abstractly outlining a wide range of potential accidental release scenarios, the potential consequences are hardly described at all, and only as potentially "significant" or potentially "quite severe." The DEIS seems implicitly to have judged that its own assessments that the probabilities of the most serious accidental rail releases are so low that the potential consequences to human health and safety and the environment need not be explored in depth.
- Where the DEIS risk discussion must be much less certain [because of the greater inherent difficulties in accurate analysis], in discussing **the likelihood** of various hypothetical accidental release scenarios leading to varying levels of consequences, **the report mostly adopts a posture of seeming to offer scientific analysis in a probabilistic risk assessment ["PRA"].**
- The DEIS cryptically terms its own methods "semiquantitative" [with no definition or explanation]. It offers only some very brief caveats on how ''the resulting estimates are most meaningful when **compared to each other, as opposed to considering them as predicting absolute frequencies or potential impacts.**" And this vague caveat itself conflates relative and absolute types of assessment: "In all cases, the purpose of the risk assessment is to demonstrate the relative likelihoods of different releases and **to estimate potential impacts, not to make precise estimates** of the chance of various impacts occurring in specific locations." [Appendix M, p. 2-2.]
- But the DEIS then in its Appendix M and throughout proceeds to charge forward- with little to no regard to characterizing its results as relative- to display repeatedly in text and charts its bold, seemingly precise and absolute estimates of [mainly vanishingly low] likelihoods of accidents along the studied rail lines [though admittedly not in any specific locations, even the most vulnerable]. One exception proves the rule, on the DEIS's discussion of the largest release event, where it cautions uncertainty from lack of data. [Appendix M, p. 4-6.]

Response T8-183

Draft EIS Appendix M, *Risk Assessment Technical Report*, explains the methods used in the analysis of risks. As noted in the appendix and discussed in the Master Response for Environmental Health and Safety Analysis, the approach used to analyze risks is based on evaluation of a selected set of scenarios. While the approach used in the Draft EIS is similar to more detailed risk assessments noted in the comment, the approach was not selected with intent of predicting when or where an incident would occur and the detailed assessment of resulting consequences. As such, it is not a quantitative or probabilistic risk assessment. By extension, the Draft EIS does not predict the specific impacts on individual resource areas or populations along rail and vessels transportation corridors. Rather, Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts that are expected if an incident were to occur.

Comment T8-184

C. The DEIS provides no discussion of two key themes which must be part of any serious PRA

- the impactful certainty of multiple uncertainties in the methodologies involved, and
- the extent of scores if not hundreds of assumptions in the analysis which involve engineering judgment.

Both of these elements are well known to practitioners as key factors in impacting the results of a PRA. This DEIS naively evidences no awareness that some of the key data and "engineering judgment" assumptions relied upon in Appendix M may be significantly inadequate or even biased. The DEIS never discusses nor provides any bounds of uncertainty for the various DEIS estimates of risk.

PRA is a very controversial methodology worldwide, with no established body of internationally agreed-upon standards guiding its development and use. Used more in Europe than in the US, it has not been adopted nationally or universally in the US except in some scattered uses. For example, some US Department of Transportation agencies recently adopted a kind of PRA- the brand new "Conditional Probability of Release" methodology developed by Professor Chris Barkan's RailTec team of researchers at the University of Illinois Urbana Champagne with significant railroad financial support -in assessing the predicted safety benefits of some key features of DOT's new High-Hazard Flammable Trains regulation, promulgated in May 2015.

In Europe, some nations [e.g., UK and Denmark] and provinces have begun relying on PRA in assessing the risks of ultra-hazardous industries, particularly in order to find some seemingly rational and scientific way to underlie decisions in land use planning. But the EU Environment Programme officials have conducted a sobering series **of authoritative overall "benchmark studies" and widely distributed reports between 1992 and 2008 assessing the use of PRA within the European Union.** These studies have been pointedly blunt in **revealing the surprisingly large uncertainties in the methodologies and the unexpected orders of magnitude differences in the results of seven prominent methodologies from different nations and consultant groups. The benchmark studies involved all seven in PRA analyses of the potential disaster risks of a single simple ammonia storage facility [unnamed, but reportedly in Thessalonica].**
[Footnote:http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.202.7445&rep=rep1&type=pdf. ASSESSING THE UNCERTAINTIES IN THE PROCESS OF RISK ANALYSIS OF CHEMICAL ESTABLISHMENTS: PART I. Kurt Lauridsen$, Michalis Christou#, Aniello Amendola+, Frank Markert*, Igor Kozine*, Monica Fiori#.]* **The project Final EIS should therefore include full and candid discussions on the uncertainties of the PRA estimates in Appendix M.**

Response T8-184

The comment cites many factors that should be considered in detailed quantitative risk assessments or probabilistic risk assessments. As noted in greater detail in the Master Response for Environmental Health and Safety Analysis, the analysis of risks associated with terminal (onsite), rail, and vessel operations presented in Draft EIS Appendix M, *Risk Assessment Technical Report,* is not a detailed quantitative risk assessment or probabilistic risk assessment. Rather, the analysis focuses on release scenarios and not detailed evaluations of the facilities or operations themselves.

As noted in the comment, many uncertainties contribute to both the actual risks and the analysis of those risks. However, by analyzing a range of release sizes, Draft EIS Chapter 4, *Environmental Health and Safety,* demonstrates that small and medium-sized spills are more likely than large spills, and that some spills, particularly larger events, are unlikely in the study area. The resulting estimates of risks related to the selected release scenarios inform not only the decisions about the proposed action but also the development of proposed mitigation measures.

Comment T8-185

D. The DEIS makes only a brief and pro forma acknowledgement of significant risks from CBR oil spills and fire/explosion events.

"Environmental Health and Safety A large oil spill or related incident involving a fire or explosion would likely result in unavoidable and significant adverse environmental impacts. The likelihood of a large spill or related explosion is low; however, the potential for significant consequences to the environment and human health in the case of a large spill, fire, or explosion is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions."[p. S-35.]

Beyond this statement, the DEIS lacks any substantive discussion or focus on the <u>consequences</u> to human health and safety of potentially serious Crude by Rail [CBR] releases, either on the PS&P line or in the extended BNSF rail haul, largely viewing these as "unavoidable and significant adverse impacts" not amenable to mitigation [pp. S-34, S-35].

Response T8-185

As discussed in the Master Response for Environmental Health and Safety Analysis, because the approach used in the risk assessment does not predict the specific impacts on individual resource areas or populations along rail and vessels transportation corridors, Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident were to occur.

The scope of this detailed analysis addresses rail and vessel transportation risks on the PS&P rail line from Centralia to the project site, and in and around Grays Harbor to 3 nautical miles from the mouth. For the reasons noted in the Master Response for Geographic Scope of the EIS, potential impacts, including risks, are qualitatively addressed for rail and vessel transportation corridors outside this area.

Comment T8-186

The DEIS's Appendix M Risk Assessment Technical Report focuses [p. 1-1] on a detailed examination and "semi-quantitative" [the term is undefined] estimates of he "likelihood of fire or explosion" from the rail spill scenarios addressed in chapters 3, 4, and 5. **Rather than define Risk in the usual way as a product of Probability times Consequence [R = P x C]**, the DEIS's approach [outlined in pp. 4-2 fi] is to focus almost exclusively on **a two-part process of only probability analyses:** to estimate the "<u>chance</u>" of a train accident occurring and the "chance" of a railcar[s] subsequently releasing.

The DEIS [in Chapter 4, p. 4.1-5] suggests that fire and explosion potentials are so remote, and also so variable, that they need not be explored thoroughly, but discussed only generally and with "qualitative" categories only. *[Footnote: I Severe environmental impacts. The spill is likely to result in a large amount of oil entering the environment and extensive damage to the human and natural environment. This would include large uncontained spills requiring extensive emergency response and*

cleanup efforts and a greater potential for the spill circumstances to result in fires or explosions. I Low environmental impacts. The spill could result in a small amount or no oil entering the environment. This would include small spills that would likely be contained and cleaned up relatively easily and would have a low potential for ignition. [p. 4.1-5] [see also 4.5-10]: 4.5.2.2 Fires or Explosions Fire or Explosion Risk A spill could cause a fire or explosion if there is an ignition source and combustible gases are present in a quantity that could ignite. The incident could cause sparking, which could ignite the spill. Explosions are most likely when a spill is ignited and the resulting fire impinges on another tank or rail car. As the material in these adjacent tanks or rail cars heat up, the pressure builds and may eventually burst the container. The extent of the damage depends on the exact configuration of the release and fire compared to the location of the other tanks or rail cars, any fire suppression capabilities, and the timing and nature of response actions. It also depends on the material: Bakken crude oil is more flammable than other heavier crude oils. The flammability of diluted bitumen varies based on the diluent (diluting agent) used. Although .fires or explosions can result from spills resulting from events like collisions and derailments, long-term historical data show that most spills do not result in fires or explosions. A fire or explosion would be less likely to occur than a spill while there have been multiple recent derailments of trains on main lines that resulted in fires or explosions, the chance of an extreme derailment is very limited in the study area because of the slow speeds on the PS&P rail line, which are slower than typical mainline speeds. In general, large derailments from high-speed trains lead to releases from multiple rail cars. The energy involved in high-speed derailments and the resulting scatter of rail cars yield the greatest chance of afire that affects other rail cars and possibly result in an explosion. The risks of fires or explosions at the terminal are presented in Figure 4.5-3. Additional information regarding the risks of fire and explosions during rail transport is provided in Appendix M, Risk Assessment Technical Report.]

The DEIS did produce a range of release scenarios based on a very brief survey off our of the most recent CBR derailments [p. 4-3], but as abstract categories, with no follow-up discussion of the consequences of the hypothetical releases beyond the vaguest generalities and some brief listing of recent serious CBR derailments. The DEIS states that release probability is low, but "the potential environmental consequences would be significant." [p. S-19]. The DEIS displayed no maps of blast zones nor fire radiation zones, and briefly dismissed smoke fumes dismissed as not a serious hazard. The DEIS pays no attention at all to any potential "Rivers of Fire" scenario, nor to any discussion of how the volumes of crude oil cargo released is the key factor which has made the railroads' recent introduction of massive CBR unit trains such a hazard. *[Footnote: "NTSB chair: Size of release more important than Bakken volatility, "KFGO AM 9 17 15 http:/kfgo.com/news/articles/2015/sep/17/ntsb-chair-no-evidence-that-bakken-oil-is-more-volatile-than-other-crude/FARGO (KFGO-AM) -The head of the National Transportation Safety Board says the volatility of Bakken crude is not a significant factor in large explosions or fires caused by tanker train derailments. NTSB Chairman Christopher Hart says the biggest contributor is the amount of oil released in an accident; rather than the volatility of the product. "Our accident investigation experience, from the ones that we have looked at, has not indicated that volatility is a significant issue" Hart said in an interview with KFGO News. "The biggest contributor to a large explosion or fire is how much product is released, rather than the volatility of the product."]* The only published academic report on the damages experienced at Lac-Megantic was based on a liquid flow model that tracked the 1.5 million gallon crude oil flows from the derailment site into the town*. [Footnote: http://railtec.illinois.edu/articles/Files/Conference%20Proceedings/2014/JRC2014-3851.pdf.]* To my knowledge, there have been no reported examples of classic circular fire radiation or blast zone damage photographs or estimates from the CBR derailments experienced so far in North America.

Response T8-186

The analysis presented in Draft EIS Appendix M, *Risk Assessment Technical Report*, and summarized in Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* relies on 2014 Federal Railroad Administration data to determine the appropriate accident rates for rail-related incidents. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks. Based on the approach used for the risk assessment to consider a range of different scenarios, the Draft EIS does not evaluate the specific consequences that could occur for any one scenario.

Comment T8-187

The DEIS throughout simply concludes that fire and explosion risks, while of low probability compared with oil spill probability, could cause potential impacts that are "significant" [Executive Summary, pp. S-19 ff], even "quite severe" [pp. S-26, S-30]. Expected low frequency here offsets potential severity. Although the DEIS suggests that even a small oil spill could escalate into a larger spill due to a fire or explosion by impacting other rail cars [Appendix M. p. 6-2], it dismisses the potentials for this happening on the PS&P line. Even though this line has had rates of accidents significantly "greater than the national average," because future accidents are assumed to happen at low speeds, they are expected to be small ones. No one section of the PS&P line is expected to be accident-prone: "The risk of a single event on an annual basis is the same for any portion of the PS&P rail line." So accident probability results are expressed on a per-mile basis in which a PS&P line community would endure more risk only to the extent that it has more trackside mileage. [Appendix M p. 6-2.]

Response T8-187

Draft EIS, Appendix M, *Risk Assessment Technical Report,* demonstrates that relatively smaller spills along the PS&P rail line are more likely than larger spills involving a large number of rail cars, and that some, particularly large events (e.g., 15 rail cars or more) are very unlikely in the study area. However, as noted in Final EIS Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Comment T8-188

A valid FEIS would have to include calculations of the additional threats posed by new traffic in CBR unit trains on the studied rail lines, above and beyond that of existing chemical tank car traffic. Concerning the latter, the Final EIS should at least discuss the potential knock-on effects on CBR traffic of other cargoes [e.g., sometimes non-CBR flammable or explosive rail cargoes may travel or be stored in close proximity to CBR unit trains on nearby sidings or rail yards].

Response T8-188

As noted in Draft EIS Chapter 4, *Environmental Health and Safety,* the risks associated with the proposed action are new to the study area. Section 4.5, *Environmental Health Risks—Rail Transport*, includes a discussion of the existing risks on the PS&P rail line, which include minimal amounts of hazardous materials. Final EIS Chapter 3, Section 3.15, *Rail Traffic*, reflects revisions to indicate that

PS&P's operating procedures do not include any planned stops between Centralia and the project site. These types of circumstances are more applicable to mainline operations. For the reasons noted in the Master Response for Geographic Scope of the EIS, the analysis of risks focuses on the study area, which includes the PS&P rail line from Centralia to the project site and Grays Harbor to 3 nautical miles from the mouth of the harbor.

Comment T8-189

Similar to the way the DEIS outlined some representative release scenarios for accidental rail release, it should have outlined for the representative scenarios an estimated range of their consequences and societal costs [as federal regulators have done in their 2014 High Hazard Flammable Train regulatory documents] as would be experienced in a representative sample of localities [town, wetlands, etc.] along the studied rail lines. [US DOT and US FEMA have shown two different ways of accomplishing this assessment of consequences, the US DOT method much less location-specific than FEMA's- see discussion below.]

Response T8-189

As discussed in the Master Response for Environmental Health and Safety Analysis, because the approach used in the risk assessment does not predict the specific impacts on individual resource areas or populations along rail and vessels transportation corridors, Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident were to occur. By extension, the potential socioeconomic impacts addressed in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, are addressed more generally. However, Final EIS Chapter 7 has been revised to include additional information about the range of impacts, including societal costs that could occur in the event of an incident.

Comment T8-190

Finally, the DEIS's own Appendix N provides an example of taking CBR accident consequences more seriously, using modeling and GIS depictions of oil spill movements, for potential oil spill only, into two key localities along the routes: Grays Harbor and the Chehalis River. The DEIS's discussion of its methodology here also usefully provided at least explicit recognition of the consequence models' limitations [resulting in inevitable uncertainties]. *[Footnote: From the DEIS: "Oil Spill Modeling Introduction The purpose of this analysis is to provide perspective on the surface movement and behavior of crude oil spilled into the project environment, specifically into Grays Harbor and the Chehalis River. Such perspective will allow planners and decision makers to understand the range of consequences that could occur after a spill and the potential variation in those consequences based on how much oil is spilled the type o(oil spilled the direction of currents at the time of the spill. and the direction and speed of the wind. The resulting modeled trajectories represent possible outcomes, not specific predictions. The information herein illustrates how spilled oil may travel and behave in the marine environment based on the assumptions described below. Spills into Grays Harbor and the Chehalis River were analyzed separately using different modeling tools appropriate for each unique environment. " Movement of Oil in Grays Harbor Methods Trajectory analyses and oil concentration contours for three different release scenarios occurring within Grays Harbor were developed using the General NOAA Oil Modeling Environment (GNOME™) software, Location Files for Grays Harbor, and GNOME Analyst. The GNOME™ User's Manual describes these tools as follows (National Oceanic and Atmospheric Administration 2002: 1, 45). GNOME is a publicly available oil spill trajectory model that simulates oil movement due to winds, currents, tides, and spreading. GNOME was developed by the*

Hazardous Materials Response Division (HAZMAT) of the National Oceanic and Atmospheric Administration Office (NOAA) of Response and Restoration. Location Files load predeveloped location data, such as an area map with shoreline contours and dominant current patterns. GNOME Analyst converts the 'best guess' splots1 displayed in GNOME to oil concentration contours, and the 'minimum regret' splots to a bounding contour. 2 The GNOME trajectory analysis was completed to provide a model of how spilled oil for each release scenario varying by release quantity, location, and set of weather and sea state conditions-would move across the water surface and which surface areas could be affected by spilled oil in the selected timeframes (24 and 48 hours after release). The resulting trajectories are not specific predictions, but models that demonstrate how various climatological conditions influence spill outcomes. They depict the movement of oil on the water's surface (spreading) and shoreline oiling without considering how oil in the environment changes in its physical characteristics and chemical composition over time. Those changes are considered weathering, which includes oil evaporation, oil droplet/fragment dispersion in the water column, oil emulsification, and eventually, biodegradation. All of these changes can affect how much oil remains in the environment and how the remaining oil spreads and moves on the water's surface. Numerous environmental factors that affect oil weathering (e.g., water salinity, the presence of microbes, the extent of sun exposure, and sediment concentrations) cannot be fully considered in the GNOME analysis. In the event of an actual spill, wind speed and direction, sea state, and currents could result in the same quantity of spilled oil moving in a different direction or farther away from the source of the release. GNOME Analyst was used to convert the modeled trajectories into an estimate of relative oil density contours (light, medium, and heavy) for the oil remaining at the surface.3 This output was depicted graphically for the selected scenarios using a geographical information system (GIS) to show the surface location for the modeled oil over the selected timeframes. The properties of the spilled oil were further evaluated using the trajectory mass balance estimates from GNOME and the Automated Data Inquiry for Oil Spills (ADIOS)4 for a comparison of the behavior of different types of crude oils in the environment. The mass balance estimates and ADIOS output predict how long different types of oil are likely to persist (i.e., weather) in the environment and how their properties change over time. Trajectory Model Limitations GNOME was selected to complete the trajectory analyses because it is a National Oceanic and Atmospheric Administration (NOAA) tool familiar to oil spill contingency planners and responders nationwide.5 A Grays Harbor Location File was already developed by NOAA for use with GNOME during development of the Geographic Response Plan (GRP) for Grays Harbor, which facilitated implementation of the trajectory modeling. Although GNOME was determined to be best suited for the purposes of this study, there are limitations (beyond those inherent in selecting specific modeled scenario conditions), as with all models. The GNOME model requires selecting the specific type of oil for the modeled trajectories from a predetermined list of pollutants. Bakken crude oil and diluted bitumen, which are the two most likely types of oil under the proposed action, are not included in this list. Therefore, the GNOME model cannot fully reflect how these types of oils would behave or persist in the environment when spilled. The GNOME mass balance output and ADIOS were used to perform additional analysis to account for this, allowing a comparison of the behavior of different types of oil in the environment. [pp. N-1, N-2].] The DEIS [4.5-6] identifies mileages along the studied rail routes of potentially impacted habitats for wildlife, but not for humans in communities.

Response T8-190

Comment acknowledged.

Comment T8-191

E. Even within its intense focus on detailed presentation of [allegedly very low] probabilities of CBR releases. Appendix M uses vague language and dubious methodologies, which it briefly and cryptically describes as mainly valid if used in a comparative way, but the findings of which it then proceeds to display in a way that gives the appearance of scientifically valid absolute conclusions as to frequencies of potential impacts:

[p. 2-1] **"A semi-quantitative risk assessment [undefined]** was conducted for the proposed actions to develop representative frequencies and potential impacts [this did not happen-ed. note] associated with a set of potential scenarios in the study area." The DEIS provides no discussion, let alone calculation, of uncertainty bounds in this report, nor any admission of the use throughout of engineering judgment in making many- mostly undisclosed- assumptions as to how to utilize the available data, which is as usual unsatisfactory. The European Union Benchmark reports on PRA [mentioned above, and see End Note 1] are all about uncertainty. *[Footnote: Major sources of PRA uncertainties were highlighted in the 2002 EU Benchmark Report: http://citeseerx..ist.psu.edu/viewdoc/download?doi=l 0.1.1.202.7900&rep=rep l&type=pdf Rise-R-1344(EN) Assessment of Uncertainties in Risk Analysis of Chemical Establishments The ASSURANCE project Final summary report Kurt Lauridsen, Igor Kozine, Frank Markert Aniello Amendola, Michalis Christou, Monica Fiori May 2002 • Det Norske Veritas Limited, UK •INERIS, Fr • Health and Safety Executive, Major Hazards Assessment Unit, UK •NCSR DEMOKRIJ'OS Systems Safety and Risk Assessment, GR • TNO, Dept. of Industrial Safety, NL • Universita di Bologna, DICMA, fl' • V1T Automation, FI • The Joint Research Centre, Ispra • Rise National Laboratory, DK Abstract This report summarizes the results obtained in the ASSURANCE project (EU contract number ENV4-CT97-0627). Seven teams have performed risk analyses for the same chemical facility, an ammonia storage. The EC's Joint Research Centre at lspra and Rise National Laboratory coordinated the exercise and led the comparison of results in order to reveal the causes for differences between the partners' results. The results of the project point to an increased awareness of the potential uncertainties in risk analyses and highlight a number of important sources of such uncertainties. In the hazard identification phase it was revealed that the ranking of hazardous scenarios by probabilistic and deterministic approaches could result in completely different conclusions. On the other hand, despite a large difference infrequency assessments of the same hazardous scenarios, there was good consensus on the ranking among the adherents of the probabilistic approach. Breaking down the modelling of both frequency and consequence assessments into suitably small elements and conducting case studies allowed identifying root causes of uncertainty in the final risk assessments. Large differences were found in both the frequency assessments and in the assessment of consequences. The report gives a qualitative assessment of the importance to the final calculated risk of uncertainties in assumptions made, in the data and the calculation methods used. This assessment can serve as a guide to areas where, in particular, caution must be taken when performing risk analyses• . . . 2 General notes on uncertainty in risk analysis Whereas Quantitative Risk Assessment (QRA) aims at the modelling of stochastic uncertainties associated with the occurrence and circumstances of a major accident, the process itself of carrying out a QRA is linked with several uncertainties. For the implementation of the risk assessment procedure a variety of techniques and models must be used, and uncertainties are introduced due to imperfect knowledge and expert judgement. As QRA is used as input in many decisions related to the control of major accident hazards and the need for accuracy in the results increases, the adequate management of these uncertainties gains increased importance. RisfJ-R-1344(EN) 5 An important source of differences in risk analysis is introduced by national philosophies underlying the analyst's effort. In addition, the application of different methods and methodologies will*

contribute to the total uncertainty/variability of the final outcome of a risk analysis. The complexity of establishing a model for the systems derives from the large number of different components, the control equipment used in modern processes and the interactions between all components and equipment, and the human operator. Further, uncertainty is introduced by the physical modelling tools, as they treat, e.g., release and dispersion phenomena, according to the relevant meteorological and environmental conditions. Uncertainty is also connected to dose-consequences relationships. Finally, there is uncertainty resulting from the various judgements of the analysts during a risk analysis. This is an unavoidable part of the process, and depends very much on the background and the operational field of the experts. Other practical constraints (e.g. time and resources) may also result in different degrees of simplifications, which in turn add to the variability of the results. Rise-R-1344(EN) 13 Comparison Overall Scenarios (Outdoors) l,OOE-08 1,00E-07 1,00E-06 l,OOE-05 1,00E-041,00E-03 J,OOE-02 110100 1000 10000100000 N F Partner 3 Partner 1 Partner 2 Partner 5 Partner 4 Partner 7 Figure 4 Discrepancy in societal risk calculations (based on fictitious population data) http :1/aes.asia.edu.tw/Issues/AES20 11/RoyPK20 1l.pdf http://gnedenko-forum.org/Joumal/2008/042008/RA TA_4_2008-13 .pdf 5-page report http://www.hse.gov.uk/landuseplanninglhseriskanalysis.pdf 2004 Final Report.]

Response T8-191

As noted in the comment, many uncertainties contribute to both the actual risks and the analysis of those risks, particularly as related to quantitative risk assessments; however, as discussed in the Master Response for Environmental Health and Safety Analysis, the Draft EIS relies on a semi-quantitative scenarios-based approach and does not include a quantitative or probabilistic risk assessment. Therefore, the risk assessment methods do not consider a margin of error to account for the inherent uncertainties in predicting risk. Rather, the Draft EIS attempts to provide context for understanding how best to interpret and apply the results of the study. More specifically, Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix M, *Risk Assessment Technical Report,* clearly state that the results of the risk assessment are more meaningful when compared to each other, rather than as predictors of the absolute frequencies of potential impacts.

Comment T8-192

F. <u>And the DEIS explicitly declines [p, 2-21 to discuss even in some "semi-quantitative" way either the local infrastructure conditions along either rail line studied [beyond mentioning some unexplained speed limitations at certain spots along the PS&P line] or any release consequence impacts that might be expected from conditions of the infrastructure in specific localities along the studied rail lines, neither the PS&P lines nor the "extended" BNSF lines.</u>

The DEIS takes no hard look, for example, at the varying condition of PS&P tracks, curvature, etc. It subsumes all these differences within the federal track Class 2 designation, even though these broad classifications are known to include a wide range of track conditions and related infrastructure. The DEIS briefly noted the causes of recent local rail line accidents, which outline of course suggests existing infrastructure inadequacies on the PS&P. [4.5-3, 4.5-4] The DEIS does not mention signaling on the PS&P line, nor suggests any federal standard for Class 2 tracks. [4.5-3]

The DEIS produces no detailed study of characteristics of [rail line, terrain, accident history] and vulnerabilities to specific parts [tribes, populations, critical infrastructure, except some animal habitats] of the routes. The DEIS characterizes risk in the abstract, based on accident rates history

for the whole PS&P rail line and by national rail accident history. DEIS takes no look at specific vulnerabilities for fire and explosion damage in specific segments of either of the studied routes [PS&P and BNSF]. The DEIS likewise makes no assessments of various track side localities' likely differing potentials for public warning or effective Emergency Response, including evacuation, Shelter in Place, etc.

The DEIS contains no discussion of the many other potential segment-specific infrastructure risk issues associated with the track structures and roadbed present on either PS&P or the extended BNSF lines, such as dangerous curves, washout potentials, trestles or tunnels, etc. It is well-established that local route conditions can pose serious derailment risks. For example, it is clear that specific route characteristics were centrally important in the Lac-Megantic, Quebec crude oil train derailment and fire on July 2, 2013. Although some have dismissively pigeon-holed the cause of the Lac-Megantic accident as "human error," the disaster was also the result of infrastructure issues involving downhill grades and the presence of curves/switches in the downtown area. Local conditions also influenced the derailment and oil spill in Lynchburg Virginia on April 20, 2014. *[Footnote: Footnote 14: "Va. oil train derailment is latest 'wake-up call': expert", CBS/AP, May 1, 2014, http://www.pennlive.com/midstate/index.ssf/2014/05/oil_tankers_fall_intojames _ri.html ("Grady Cothen, a former Federal Railroad Administration official, said given the recent wet weather in Virginia and the accident's location near a river, it's possible that soft subsoil may have weakened the track, Cothen speculated. '').]*

Finally, the example of the 2005 Graniteville SC chlorine rail car collision disaster highlights the importance of "dark territory" rail risks and the differences in safety associated with different levels of train control, some more robust than others. The DEIS mentions [pp. 5- 11, 5-12] the very different train control systems [Track Warrant Control and Centralized Control] used at specific segments of the BNSF routes, but it tellingly fails to discuss any potential differing impacts on CBR safety. *[Footnote: Footnote 15: As noted before, the DEIS failed to discuss signaling on the PS&P line.]*

1. In assessment of rail risks, this DEIS lack of study of local rail infrastructure conditions and local vulnerabilities collides head-on with what the most sophisticated researchers know about assessing rail risks, including Professor Barkan's RailTec research group at UUIC, on whose research [Liu et al., 20 14] *[Footnote: http://www .ncbi.nlm.nih.gov/pubmed/24929785 J Hazard Mater. 2014 Jul15; 276:442-51. doi: 10.1016/j.jhazmat.2014.05.029. Epub 2014 May 22. Probability analysis of multiple-tank-car release incidents in railway hazardous materials transportation. Liu X, Saat MR, Barkan CP.]* the Appendix M analysis heavily relies. Dr. Barkan's own past work acknowledges the importance of looking at local features when assessing risk. For example, in a 2003 study, Dr. Barkan noted that "[t]he severity of a particular hazardous materials accident" relates to ''the particular circumstances and location of the release." In that same study, Dr. Barkan vividly highlighted the very top risk factors in accident causation on a given stretch of track as including broken rails and welds. *[Footnote: Christopher Barkan et al., Railroad Derailment Factors Affecting Hazardous Materials Transportation Risk, Transportation Research Record 1825, Paper No. 034429 at 67 (2003), available at http://railtec.illinois.edu/cee/pdf/Barkan _et_al_2003.pdf.]*

Response T8-192

As noted above, Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these

regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

The detailed approach explained in Appendix M, *Risk Assessment Technical Report,* and discussed in the Master Response for Risk Assessment Methods, evaluates the likelihood of certain incidents occurring and considers all causes of failure, including construction defects, natural hazards, human error, and material failures.

Comment T8-193

2. And the DEIS ignores such valuable analogous information such as underlay the US FEMA CBR emergency response drill in Jersey City NJ 2015, which featured overlay maps with vivid impact zones maps for fire radiation, blast, and toxic cloud] consequences of a [relatively minor] five-railcar CBR derailment release of 100,000 gallons. FEMA's consultant calculated consequence impact zones from the ensuing fire and explosions, estimating in some instances thousands of casualties and significant damages. *[Footnote: http://www.nj.com/hudson/index.ssf/2015/03/jersey_city_hosts_workshop_with_fema_homeland_secu.html. FEMA's NJ CBR exercise slides 27-28 have overlay maps of CBR derailment consequences in Jersey City. http://www .wsj.com/articles/disaster-plans- for-oil-trains- 1428969241.]*

Response T8-193

Draft EIS, Chapter 4, *Environmental Health and Safety*, includes a discussion of recent rail-related incidents to provide context for types of consequences that have occurred in other parts of the United States. However, as noted in the Master Response for Risk Assessment Methods, the risk assessment addresses risks specific to the PS&P rail line. The results are not directly comparable to studies that evaluate risks outside this area; for example, on the BNSF main line. Refer to that master response for additional information about how large-scale rail incidents, including those that have recently occurred, have been factored into the risk assessment.

Comment T8-194

3. The DEIS cites previous experienced CBR disasters, but ignores the possible specific local consequences of any of the risks it identifies. The draft EIR's hazardous impacts section contains a brief description of the fallout from major crude-by-rail accidents at Lac-Megantic; Lynchburg, Virginia; Aliceville, Alabama; and Casselton, North Dakota. However, it fails to disclose or analyze the reasonably foreseeable local impact of a comparable accident along the studied rail routes. For example, at Lac-Megantic, 63 tank cars derailed, releasing 1.5 million gallons of crude oil, which then ignited, killing 47 people in a tiny town of 4000. The accident occurred at 1:30 AM on a weekend night, with a few dozen people downtown, celebrating two birthday parties in the MusiCafe. Some cities along the studied PS&P and BNSF routes have populations vastly more dense at various times of day. The DEIS does not try to estimate what the

consequences could be if a similar inferno occurred in even a representative sample of these locations, even if the probability is low.

Response T8-194

The analysis of potential environmental health and safety impacts looks at the relative risks for a set of release scenarios that could occur as the result of terminal operations and rail and vessel transport associated with the proposed action. As noted in Appendix M, *Risk Assessment Technical Report*, the release scenarios are informed by regulatory requirements to assess the worst-case discharge for terminal, rail, and vessel operations. This approach provides decision-makers and planners with a range of outcomes that could occur related to the proposed action so they can understand the risks of concern and propose targeted mitigation measures. By extension, the Draft EIS does not predict the specific impacts on individual resource areas or populations along rail and vessels transportation corridors with any single release scenario, including mapping potential outcomes. Rather, Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts that would be expected if an incident were to occur.

Comment T8-195

G. <u>The main rail accident probability analysis relied upon by DEIS [Liu, Saat and Barkan 2014] admits that the available probability literature has systematically neglected [cf. "Liu et al2014", p 449] an adequate study of derailment consequences also cites the paucity of research on multi-car releases such as now seen regularly in North American CBR events.</u> *[Footnote: Liu et al2014 op.cit, p 442: Rail transport of hazardous materials differs from highway transport in several respects. Notably, rail transport involves trains of multiple cars, sometimes over 100 in a single train. Some or all of these may be tank cars transporting hazardous materials. By contrast, highway transport generally involves only a single tank trailer. Unlike highway transport, derailment of a hazardous materials train may result in releases from multiple tank cars. In the event of a large, multiple-car release incident, there is the potential for considerable impact on human health, property, and the environment. Furthermore, such releases may be much more challenging for emergency response than a highway incident because of the large quantities involved. Several recent multiple-tank-car release incidents, such as the derailments in Schellebelle, Belgium in May 2013, Lac-Megantic, Canada in July 2013, Aliceville, Alabama in November 2013, and Casselton, North Dakota in December 2013, underscore the importance of multiple-car release incidents.]*

Response T8-195

As noted in the Master Response for Risk Assessment Methods, the risk assessment uses methods and relies on data sources to consider various factors relevant to influencing risks along the PS&P rail line but, as referred to in the comment, notes limitations and uncertainties related to the analysis. Refer to the master response for additional information about how the risk assessment considers available data and applies relevant factors to the analysis of risks.

Comment T8-196

The DEIS throughout makes no explicit mention of railroads' relatively new business plan of transcontinental operation of crude oil unit trains as key new risk, but does mention speed and length of train as key factors in risk of severity. [p. 4.5-3]

The DEIS does not analyze or take into account the **unique risks that crude oil unit trains pose. CBR unit trains tend to be longer and heavier than traditional shipping trains**. As explained by the United States Department of Transportation, crude oil unit trains:

> *are longer, heavier in total, more challenging to control, and can produce considerably higher buff and draft forces which affect train stability. In addition, these trains can be more challenging to slow down or stop, can be more prone to derailments when put in emergency braking, and the loaded tank cars are stiffer and do not react well to track warp which when combined with high buff/draft forces can increase the risk of derailments. [Footnote: Footnote 20: US Dept. of Transportation, Pipeline and Hazardous Materials Safety Administration, Draft Regulatory Impact Analysis for Hazardous Materials: Enhanced Tank Car Standards and Operational Controls for High-Hazard Flammable Trains; Notice of Proposed Rulemaking, July 2013 ["Draft RIA"] at 24.]*

Multiple professional organizations as well as regulators have recognized the huge differences in risk between transporting crude oil by unit train and traditional manifest train rail shipment, including the Association of American Railroads' August 2013 Circular OT-55N *[Footnote: Footnote 21: AAR requires member railroads to comply on line with OT-55-N: http://www.pdffiller.com/46827111-0T -55pdf-AAR-Circular-No-OT-55-N-Various-Fillable-Forms. Association of American Railroads, Freight Railroads Join U.S. Transportation Secretary Foxx in Announcing Industry Crude By Rail Safety Initiative, Feb. 21, 2014, https://www.aar.org/newsandevents/Press-Releases/Pages/Freight-RailroadsJoin-U-S-Transportation-Secretary-Foxx-in-Announcing-Industry-Crude-By-RailSafety-Initiative.aspx file:II/C:/Users/finillar/Downloads/AAR_Response_2013-10-21-155952%20(1).pdf.]* and the experts in the US National Transportation Safety Board's April2014 Safety Forum. *[Footnote: Footnote 22: US NTSB Safety Forum on Crude Oil and Ethanol Transportation April22-23, 2014 http:l/ntsb.capitolconnection.org/042314/ntsb_archive_flv.htm.]* Various federal safety studies and federal agency directives have also cited unit trains as a key safety concern. In fact, the UIUC RailTec team's prior scholarship suggests that length and other special characteristics of unit trains are important to assessing risk. *[Footnote: From the DEIS Appendix M: Data from the RPI-AAR Railroad Tank Car Safety Research and Test Project also provided information on the probabilities of release for rail cars of different designs and the detailed analysis to determine the chance of different numbers of cars derailing and releasing different quantities of the product carried. Liu eta/. (2014) provides a recent description of this approach and gives some representative results. For Class I railroads, 24% of derailments involved one car, 50% involved five or fewer cars, and the overall average was about nine cars. As a group, the Class I railroads operate largely on Class 4 or 5 track, with the associated higher speeds. The same article provided an example of an analysis of DOT-111 rail cars versus the enhanced CPC-1232 design. For the scenario that was modeled (a specific configuration and track class, with a mixed cargo train involving 10 cars of concern) the average conditional probability of release from a DOT-111 car was 0.266, while for a CPC-1232 the same probability was 0.064. The change in chance of release per car also changes the number of cars releasing and therefore the relative likelihood of the spills of different sizes. This analysis used a combination of these and other data to determine representative distributions of release sizes for the two types of rail cars addressed in the assessment of the proposed actions, given that a derailment or collision has occurred on the PS&P rail line. [p. 4-4].]*

Response T8-196

As noted in Draft EIS Appendix M, *Risk Assessment Technical Report*, the risk assessment considers data sources and factors unique to the transportation of crude oil by rail when evaluating the risks associated with the proposed action. As summarized in Chapter 4, *Environmental Health and Safety,* risk associated with the no-action alternative are based on existing operations, which do not

currently include crude oil transportation. As noted in Chapter 4, implementation of the proposed action would include new risks specifically related to crude oil in the study area. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-197

Finally, since railroads historically pride themselves on developing their own distinctive cultures, including differing safety cultures and operating rules, adequately predicting the probability of accidental release of crude oil along any given rail line would require an assessment of each carrier's particular operations, behavior, and relative risk of flammable unit trains, especially their accident history and potentials.

Response T8-197

Draft EIS Appendix M, Section 4.2.2, *Accident Rates,* states that the determination of a chance of derailment or collision (i.e., accident rates) is derived from Federal Railroad Administration data through October 2014. Train accident rates were collected from all operations on Class 2 track nationwide, both for mainline operations and for all track including main lines, industry tracks, yards, and sidings. The same data were collected specific to the PS&P rail line. As discussed in the Master Response for Risk Assessment Methods, the selected sources consider all causes of failure, including construction defects, natural hazards, human error, and material failures.

Comment T8-198

H. The DEIS relies heavily in in PRA analyses on rail industry sources and methodologies and data that cannot be counted on to be unbiased.

In Appendix M Section 4.2.1, the DEIS relies heavily on rail industry risk models and on a probability study based on industry data by researchers at the University of Illinois Urbana Champagne, Liu, et al., 2014 [4-4]. This study's listing UIUC team's sources of support reveal the how heavily the railroad industry has supported its research: it cites support from American Association of Railroads, BNSF, and CN.

Response T8-198

The primary data source for rail accident rates was the Federal Railroad Administration data finalized through October 2014. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-199

And one clear focus of the Liu, et al., 2014 paper [pp. 447-448] was to compare performance of currently massively failing DOT-Ill tank cars to the rail industry's own recently introduced beefed-up version, the AAR standard 1232. Furthermore, Appendix M reports that the Liu, et al., 2014 paper [pp. 4-3 to 4-5] crucially relied on a much older 1996 “detailed hazardous materials rail transportation model develop [sic] by Arthur D. Little for the [American Association of Railroads [AAR], the Railway Progress Institute and the Chemical Manufacturers Association]”, and on an AAR research project using the model, and used AAR proprietary “up- to-date statistics”, with no further elaboration. *[Footnote: Footnote 24: Arthur D. Little, Inc. 1996. Risk assessment for the transportation*

of hazardous materials by rail. Supplementary report: railroad accident rate and risk reduction option effectiveness analysis and data. 2nd revision. Arthur D. Little, Inc., Boston, Mass.]

Response T8-199

The 1996 model referred to in the comment allows for current accident rate data to be applied and for different configurations of tank cars (such as thicker walls, jackets, fitting protection, and other factors that will be on the new designs required under the May 2015 final rule) to be taken into account. This current information is included in Draft EIS Appendix M, *Risk Assessment Technical Report*. The main reliance on this model is for the evaluation of different numbers of cars derailing and spilling, not for 20-year old source of data.

Comment T8-200

That 1996 model, despite being based, according to Appendix M, on statistics that showed that overall average [p. 4-4] US derailment was about 9 cars, did not include any "representative scenario" larger than "Five rail cars spilled simultaneously." And it obviously could not capture data relevant to the obvious recent history of much larger releases with High Hazard Flammable Trains and CBR unit trains [averaging 100-plus cars] in particular, so the DEIS simply injected another example of engineering judgment [Appendix M, p. 4-4]:

> *Additionally, an extreme case of 450,000 to 900,000 gallons (10,714 to 21,429 barrels) was added, to put such extreme spills in perspective, even though most [but not all, editorial note] recent extreme spills occurred at much higher speeds than would be experienced on the PS&P rail line.*

This new larger DEIS scenario [about 30 cars total oil contents] still did not match the already experienced July 2013 fatal releases at Lac-Megantic, however, which released 1.5 million gallons from many more cars.

Response T8-200

As noted in the response to the previous comment, the 1996 model referred to in the comment considered the following factors: data estimates of accidents involving more derailed cars; consideration of more current (or future required) design characteristics; and more current accident rates (Federal Railroad Administration data from 2011 through 2014). In Draft EIS Appendix M, *Risk Assessment Technical Report*, Table 6 and its associated text explain the basis of the accident rate derivation and notes the analysis considered recent Federal Railroad Administration data (through October 2014).

Comment T8-201

The DEIS outlines clearly enough how **industry data, analyses, and approaches** to risk assessment are key to all the main features of the DEIS work on rail release probabilities and have been used in ways which are not transparent. But the **DEIS is not clear just what ranges of historical data it used [p. 4-S] to make estimates of rail accident rates.**

When it cites FRA data it does not clarify what the historical time range of that data is, either for PS&P lines or for Class 2 track nationwide. Since FRA's historical accident data is often lauded by federal and industry researchers as a uniquely valuable 30-year database, it may well be that the DEIS used FRA rail accident data in large part based on US train operations from prior to the sudden recent introduction of transcontinental unit train CBR operations around 2012, which many

observers would thus conclude are invalid. In fact CBR unit train operations began so recently that some would say that the oft-used rule of researchers' need for at least five years of comparable data does not allow any current firm conclusions on CBR safety.

Response T8-201

Draft EIS Appendix M, Risk *Assessment Technical Report,* Table 6. *Accident Rates* (per million train miles) for Track Class 2 shows that only 2011 to 2014 data were considered, not older data that would be less relevant to the proposed action.

Comment T8-202

I. The DEIS makes invalid uses of data.

A credible probability analysis depends crucially on a complete, arguably relevant dataset. No analysis of the probability of a crude oil release from a unit train can be based on data from non-comparable events or from railroad operations varying from each other across carriers, across time and across regions.

Throughout the Appendix M Technical Report, there are repeated instances of its blending of various kinds of data and analyses in unexplained ways, usually with no assumptions [cf., e.g., p. 2-2 of Appendix M] provided as to how any weighting of various factors has been made, and with no explicit admission that there is a huge potential for sweeping and unaccountable "engineering judgment" having been exercised, as opposed to relying on defensible research sources and available data in the public domain. *[Footnote: From the DEIS Appendix M: E.g., "This analysis used a combination of these and other data to determine representative distributions of release sizes for the two types of cars addressed in the assessment of the proposed actions, given that a derailment or collision has occurred on the PS&P rail line." [4-4] The PS&P rail line in the study area covers 59 miles of Track Class 2 lines. All traffic in the study area moves at 25 miles per hour (mph) or less, as per Track Class 2 standards. Several key bridges and areas have lower speed limits: 10 mph over Devonshire Bridge (Wynoochee River) because of bridge condition and 5 mph over the moveable bridges over the Wishkah and Hoquiam Rivers. For conservatism and to match the official designation, this analysis is based on PS&P historical data as well as data for other Class 2 track operations nationwide. [DEIS, Appendix M, p. 4-1].*

Furthermore, the DEIS [p. 2-2] characterizes only most vaguely its uses of accident data: combining data on future train trips on the studied rail lines plus FRA historical data "coupled with" numerous studies of accidents and releases. The DEIS provides no details on its data-coupling methods or assumptions here.

Response T8-202

Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report,* use the latest data available on rail accident rates from the Federal Railroad Administration. These data include the more recent crude oil train incidents; however, accident rates specific to crude oil trains only are not available. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-203

Where the DEIS does give details of sources of its calculations of risk, in its calculations of online storage tank failure risks, its use of "historical data along with guidance published by the United Kingdom's Health and Safety Executive" [since such information is presumably not available in the US with our more litigious culture] requires the reader to assume that oil storage technology, materials, standards, history, operating procedures and practices, regulatory regimes, corporate safety cultures, maintenance, human error rates, etc., in the UK industry are closely aligned with those in the US -a big ask. *[Footnote: The HSE data itself is a hodge-podge of data sources, some of which the HSE guidance document authors admittedly see as probably invalid, but the guidance document is apparently crucially needed for ongoing immediate use by HSE inspectors for advice in local/and-use decisions involving high-risk facilities.*
The DEIS Appendix M also cites another UK source, a 2014 UK study of onsite oil storage risks which is quite useful, in that it casts doubt on the DEIS reliance on PRA methodologies generally:
REVIEW OF FAILURES, CAUSES & CONSEQUENCES IN THE BULK STORAGE INDUSTRY
W.Atherton and J. W.Ash, Liverpool John Moores University, Faculty of Technology and Environment, School of the Built Environment, The Cherie Booth Building, Byrom Street,
Liverpool L3 3AF, UK
http://www.lightningsafety. com/nisi_lls/Causes-of-Failures-in-Bulk-Storage.pdf
This study cites the huge 2005 UK Buncefield Oils Storage Depot release and explosion to indicate that such disasters will happen and that current UK safety technology is inadequate. It suggests that the statistical approach [which the authors do not challenge head-on] that predicts very low probability needs to be contrasted with a more pessimistic approach informed by recent failures, including Buncefield which they see as "raising many yet unanswered questions": ABSTRACT The cataclysmic events, which occurred at the Buncejield Oils Storage Depot in Hertfordshire on Sunday 11th December 2005, resulted in what is widely regarded as the largest explosion in Europe since the Second World War. This event placed the bulk storage industry in the spotlight, raising many yet unanswered questions. Accidents of this nature involving the catastrophic failure of tanks used for the storage of hazardous liquids are rare, and the risk of such incidents occurring is estimated to be low, somewhere in the region of 5 x 10-6 per tank year (Thyer et al 2002). In contrast to this statistical approach, Michels et al (1988) adopted the view that "a tank will fail somewhere sometime". Causalities of such events vary; the consequences however are ordinarily the same, incurring environmental, financial and infrastructure losses. A review of the various causes of failures aims to highlight the extent of the problems, which have occurred in the bulk storage industry together with the environmental and human impact of such incidents. Through a process of spill modelling the magnitudes of such losses have been identified across a range of scenarios. Recent results have indicated that the losses incurred during less dramatic modes of failure can ultimately be significant. This gives rise to the conclusion that a suitably practicable means of mitigation has to be identified and implemented if the levels of potential risks are to be suitably controlled.]

Response T8-203

As noted in the comment, the failure data were published by a United Kingdom source; however, the study considered multiple data sources from the United Kingdom, other parts of Europe, and the United States. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-204

Given the lack of transparency in the DEIS's reports of its probability analysis, it is impossible to discern whether or how the DEIS has weighted some risk factors more heavily than others in assessing the probability of hazardous impact. The DEIS failed to take into account many factors, described above, that suggest that the proposed crude-by-rail project has significant hazardous impacts. Even among the risk factors it does consider, the DEIS does not discuss or rank which factors are most important, and by how much, in accounting for releases from trains. Diminishing the weight given to the most important risk factors necessarily skews a risk analysis toward underestimating the risks present.

Response T8-204

The risk assessment does not include weightings for different factors except where they are explicitly captured in available data—such as the track class for rail operations or the type of waterway for vessel operations. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-205

J. <u>The DEIS's method of calculating risk is not safety conservative.</u>

Despite all the foregoing omissions and oversights in its analysis, the DEIS complacently asserts [by analogy only here, regarding onsite oil storage risks at the project, in Appendix M, p. 3-4] that its estimates are "likely to overestimate the chance of release" from storage tanks.

There is no reason to think this is the case, and in fact, as detailed above, there are many reasons to think the analysis underestimates the potential public safety risks inherent in the project. The short life of the crude-by-rail industry in North America has already seen a number of serious CBR releases. The DEIS makes no effort to suggest that the probability of release derived from its calculations are either higher or lower than experienced real-world release rates regarding CBR derailments.

Response T8-205

Comment noted.

Comment T8-206

K. <u>The DEIS adopts a posture of over-reliance on the existing frameworks of federal, state and local laws and regulations that presumably will ensure safety in future CBR unit train operations.</u>

Despite salient recent rail disasters that were caused by failures to adhere to federal regulations, e.g., the fatal 2013 Lac-Megantic and 2015 Amtrak rail events in which speed limits were violated, the DEIS displays, even in discussing the extended transport risks on BNSF lines, no serious facing up to the kinds of human error and operational failures that might cause CBR disasters along the studied lines. Regulations on routing track class and speed are presumed appropriate, and "the train control system ensures safety by managing rail traffic through signaling systems." (p. 5-11)

Response T8-206

Although the Draft EIS considers existing regulations, the analysis does not presume that safety would be adequately addressed. Final EIS Chapter 4, Sections 4.4.4, 4.5.4, and 4.6.4, note that no measures can completely eliminate the possibility of a spill, fire, or explosion, nor would they completely eliminate the adverse consequences of a spill, fire, or explosion.

Comment T8-207

2. **Federal gaps:** Regarding prevention of and preparation for rail accidents, the DEIS fails to note in Chapter 4 that the recent High Hazard Flammable Trains regulation, promulgated May 8, 2015, will allow many years for phase-in of new safety standards. The DEIS also fails to note that there is ongoing uncertainty regarding whether and/or when the enacted Positive Train Control regulations will be implemented on time and whether/or when the proposed new federal Oil Spill Contingency Plan regulations will be finalized [4.2-3 ff]. The DEIS also fails to assess the effectiveness of all the federal emergency planning elements it describes as in place [pp. 4.2-4fl]. The DEIS includes no assessment of the impact on health and safety of existing federal protections that have for decades allowed large swaths of railroad secrecy, and thus a significant grant of unaccountability, on their disaster risk policies, decisions, and outcomes- much less any DEIS assessment of the substantial potential future increment of secrecy for railroads' own risk information which FRA is proposing to grant to railroads in Docket FRA-2009-0038. *[Footnote: FRA's Proposed Rule on freight railroad Risk Reduction Programs is at Docket No. FRA- 2009-0038. FRA was directed by Congress, reacting to several serious US rail accidents, in the Rail Safety Improvement Act of2008 to impose on freight railroads operating in the US a modern type of Risk Reduction Program regulatory regime. FRA proposed adding a significant new secrecy regime to protect railroad risk data from disclosure in court. http://www.regulations.gov/#!searchResults;rpp=25;po=0;s=FRA-2009-0038;fp--true;ns=true.]*

Response T8-207

Draft EIS Appendix M, *Risk Assessment Technical Report*, explains how requirements for phasing in rail car design improvements are considered in the risk assessment. Further, as required by SEPA, and noted in the Master Response for Purpose and Focus of the EIS, the Draft EIS addresses the potential impacts associated with the proposed action; it does not evaluate the effectiveness of existing regulations, which is outside the scope of the analysis. However, as allowed by SEPA, the Draft EIS does identify broader measures that could be implemented to generally improve safety in the study area. In some cases, recommended measures may be part of ongoing efforts to address existing problems (unrelated to the proposed action) or may be related to existing requirements or regulations in place to protect public resources and safety in general. Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to reflect consideration of evolving state and federal legislation aimed at improving the safety of crude oil by rail.

Comment T8-208

3. **State gaps:** The DEIS does not discuss any of the post-Lac-Megantic state-level reports [including those from Washington State agencies] on CBR risks and emergency response and planning which have often revealed large gaps in state and local preparation for serious CBR accidents. The DEIS does assert that state-level improvements may be on the way [seep. 4.5-8], but fails to note that the Washington State legislature must have identified some serious gaps in

state capabilities to necessitate passage of ESHB 1449 in 2015 that authorizes the state Ecology Department to adopt rules requiring PS&P railroad to prepare an oil spill contingency plan. *[Footnote: From the DEIS p. 4.5-8: WA State in 2015 passes bill on ER planning for RRs The Washington State [sic] passed ESHB 1449 in 2015, authorizing Ecology to adopt rules to require PS&P to prepare an oil spill contingency plan. The plan would, among other things, demonstrate that PS&P has the capacity to remove oil and minimize any damage to the environment resulting from a worst-case spill. Prior to adoption of rules. The federal oil spill response plans will be used to meet the state requirement.]*

Response T8-208

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment T8-209

4. **Local gaps:** The DEIS **does acknowledge significant deficiencies in local capabilities [p. 4.5-8, pp. 4.5-11- 4.5-12]** to respond to a serious CBR derailment event, but as mentioned earlier seems to regard these as inevitable and unlikely to be strengthened significantly enough to reduce CBR risks. The DEIS states "the onus is on the responsible party to respond with appropriate resources" in case of release, but makes little effort to assess the railroad's capabilities to respond in a timely and effective way, and even notes that federal and state authorities are beefing up regulations to demand more robust railroad plans and capabilities obviously currently assessed as inadequate [p. 4.5-8].

Response T8-209

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment T8-210

L. The DEIS-proposed mitigations are inadequate, skewed towards emergency response vs. prevention, and make no demand on BNSF for beefing up its capabilities for derailment impacts DEIS considers "unavoidable and significant adverse impacts."

Response T8-210

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport in the extended study area qualitatively.

Comment T8-211

M. Rail Haul Safety Issues

The DEIS mitigations show reliance on:

- Voluntary Improvements based on future federal regulatory compliance and future implementation of prevention-oriented measures from DOT's HHFT regulations.
- Four pages of mandatory future measures [5-51ff] - all emergency response-oriented- by applicant and shippers and SP&P railroad. Carrier must submit ER plan with several types of information and must act to improve ER capabilities.

This is certainly a long list of apparently needed safety improvements, perhaps unsurprising for an area that reportedly does not have a single hazmat team along the PS&P routes.

But in order to offer a way to estimate future desired reductions in risk, the DEIS should have assessed the existing baseline status of these human health and safety and environmental risks and capabilities along the covered rail lines. And the DEIS should have included both railroads' current baseline information on not only on CBR accident worst case scenarios, but also on railroads' [admittedly inadequate] insurance coverage, emergency response plans, and CBR risk-reduction routing criteria, routing analyses and routing decisions.

Response T8-211

Draft EIS Chapter 4, *Environmental Health and Safety,* acknowledges that existing risks within the study area do not include those associated with crude oil handling, storage, or transport. Therefore, potential impacts associated with risks of exposure to crude oil, such as could occur from a spill, fire, or explosion are described in Section 4.7, *Impacts on Resources*,

Final EIS Chapter 4 has been updated to reflect consideration of evolving state and federal legislation aimed at improving the safety of crude oil by rail and additional measures have been recommended consistent with the framework identified in the Master Response for Mitigation Framework.

Comment T8-212

Ample academic work by Glickman and other experts has underscored the significant risk-reduction benefits of protective hazmat rail routing, and such work was cited favorably by US DOT regulators as recently as in their 2014 Draft Regulatory Impact Analysis. But the DEIS accepts the BNSF state-

wide routing decisions without any examination of safety implications and with no comparison of potential alternative BNSF routing decisions. *[Footnote: Explosion Response PHMSA provides guidance for a fire or explosion from a train carrying crude oil (Pipeline and Hazardous Materials Safety Administration 2014), which states that, "in the event of an incident that may involve the release of thousands of gallons of product and ignition of tank cars of crude oil in a unit train, most emergency response organizations will not have the available resources, capabilities, or trained personnel to safely and effectively extinguish afire or contain a spill of this magnitude (e.g., sufficient firefighting foam concentrate, appliances, equipment, water supplies). Response to unit train derailments of crude oil will require specialized outside resources that may not arrive at the scene for hours; therefore it is critical that responders coordinate their activities with the involved railroad and initiate requests for specialized resources as soon as possible. " As with oil spills, first responders from the local jurisdictions or the railroad emergency response team would provide an initial investigation. The first responders are expected to enact defensive operations until appropriate and adequate resources are on scene. The on-scene coordinator would contact the company responsible for the product for technical support related to an emergency with the oil or chemical (49 CFR 172.604). Rail carriers provide emergency response resources. These may include air monitoring and environment management capabilities, technical specialists, and contractors to assist in managing the consequences of a crude oil train derailment (49 CFR 130.31). Final rules updating the requirements are pending. Capabilities at the local level differ between fire departments. The local fire departments along the PS&P rail line do not have technical hazardous material teams. Air monitoring capabilities vary based on the equipment and personnel trained. Supporting resources may be available from surrounding jurisdictions. Under Revised Code of Washington (RCW) 43.43.961, the Fire Service Resource Mobilization Plan provides personnel, equipment, and other logistical resources from around the state when a fire or other emergency, like a hazardous material release, exceeds the firefighting and hazardous material capacity of local jurisdictions (Washington State Patrol Office of the State Fire Marshal2014:5). State agencies that share responsibility as primary agencies for a hazardous material response are Ecology and the Washington State Patrol (Washington State Emergency Management Division 2011). If afire or hazardous material response incident escalates beyond the limits of state resources, additional federal assets can be requested for an incident. Typical emergency actions for responding to a crude oil train derailment resulting in an explosion or fire are as described in Section 4.5.2.1, Oil Spills, Oil Spill Response. Similar actions would be taken for all products proposed to be transported. [pp. 4.5-11, 4.5-12.]*

Response T8-212

Based on the reasons addressed in the Master Response for Geographic Scope of the EIS, the analysis presented in Draft Appendix M, *Risk Assessment Technical Report,* focuses on the PS&P rail line from Centralia to the project site. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment T8-213

The DEIS proposed, in short, virtually no new voluntary or mandatory mitigations on the <u>prevention</u> side of the PS&P and extended BNSF rail haul risks that go beyond whatever the new federal regulations have already mandated [for implementation phased in over some years].

Before the FEIS is provided, **Applicant could insist on**, e.g., various new prevention-oriented risk reductions: slower speeds than fed regulations for Class 2 track, shorter trains, time of day planning, cargo volatility regulations, risk-**reduction routing** *[Footnote: On CBR routing issues the DEIS simply*

takes a pass and bows to unregulated and unaccountable BNSF transcontinental CBR route planning, not mentioning any concern regarding the potential ineffectiveness of current minimal and toothless railroad-friendly federal regulations on rail hazmat routing [recently extended to cover HHFTs] to protect either vulnerable cities, sensitive environmental areas or tribal resources along potential CBR routes: Crude Oil Unit Bulk Train Routes: BNSF has not specified a route for crude oil unit trains in Washington State. BNSF has stated that routes will be determined based on operational needs and may vary. Most trains enter and leave Washington State over the BNSF corridor between Sandpoint and Spokane. In some cases, a few trains arrive and/or leave on UP routes from Oregon and California. Currently, BNSF directs westbound loaded unit bulk trains, including crude oil, from Spokane to Vancouver, Washington on the Columbia River Gorge route. In Vancouver, the unit trains are switched to the north-south main line and travel north to Puget Sound and beyond. BNSF directs eastbound empty trains on the Stevens Pass and the Columbia River Gorge... [p. 5-17].], beefed-up signaling systems, shorter times for retrofitting railcars, beefed-up bridges and tunnels, etc.

Response T8-213

Draft EIS Chapter 4, Section 4.2.1, *What framework prevents incidents from happening*? the existing prevention framework consists primarily of operations implemented by the responsible party (facility, rail, or vessel operators) or design features and standards that are regulated by the appropriate government agency. Prevention and emergency response measures require participation and coordination with broader group of stakeholders to be successful. To the extent feasible within the framework described in the Master Response for Mitigation Framework, the Final EIS has been revised to propose mitigation measures aimed at addressing emergency prevention, preparedness, and response planning gaps. Refer to the Master Response for Mitigation Framework for additional information special considerations related to the State's authority to set operations or safety standards on the railroad.

Comment T8-214

Without any analysis, DEIS Appendix M in Section 4.1 dismisses any potential accidents in switching operations, only briefly citing as a rationale the relatively low speeds in those operations. With unit train operations, there will be by design little or no switching along all the routes, but in the case of shipment of smaller quantities of CBR cargoes in manifest trains some switching could occur at various points along the line.

Response T8-214

Draft EIS, Appendix M, *Risk Assessment Technical Report,* acknowledges that accidents could also occur during switching; however, the speeds are typically so low that the chance of a puncture and release is much lower than during transport. If a release were to occur during switching, it would most likely be a relatively slow release from one rail car. Therefore, release scenarios during switching activities are not considered further in this analysis except as otherwise built into the accident rates.

Comment T8-215

Quinault Indian Nation Comments on Westway and Imperium DEISs

EXHIBIT 3

WESTWAY AND IMPERIUM DEIS INDEPENDENT REVIEW

Resource Dimensions

Economics I Community Solutions I Land Use I Natural Resources I Regulatory Support Gig Harbor, Washington I www.ecologicalecon.com

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TABLE OF ACRONYMS

CEQ	Council on Environmental Quality
DEIS	Draft Environmental Impact Statement
DOE	Department of Ecology, Washington State
EO	Executive Order
FOGH	Friends of Grays Harbor
GHRT	Grays Harbor Rail Terminal, LLC
ICF	ICF International
IMPLAN	Impact Analysis for Planning
ITS	Imperium Terminal Services, LLC
NEPA	National Environmental Policy Act
PGH	Port of Grays Harbor
QIN	Quinault Indian Nation
SEPA	Washington State Environmental Policy Act
SOW	Scope of Work
U&A	Usual & Accustomed
WTC	Westway Terminal Company LLC

PROJECT BACKGROUND AND PURPOSE

The Port of Grays Harbor (PGH), on Washington State's Olympic Peninsula, is a shipping hub that facilitates the transportation of a diverse cargo mix to domestic and international ports. Grays Harbor is also an important ecosystem that supports commercial fishing, tourism, and rich tribal

culture. Two PGH tenants are proposing expansion of their existing storage and transport capabilities and a third is proposing construction of a new storage facility at the port.

Westway Terminal Company LLC (WTC) is proposing expansion of its storage capabilities to accept crude oil from the Bakken Oil Field and the Alberta tar sands. *[Footnote: While all three projects could accommodate a variety of bulk liquids, project proponents state that crude oil would be the predominant liquid.]* The proposed project would add five storage tanks with a total capacity of 42 million gallons of crude oil. A maximum of 806.4 million gallons of crude oil would be unloaded from 458 unit trains, stored, and transferred to 238 large ocean-going tank vessels.

Imperium Terminal Services LLC (ITS) also proposes expanding its existing bulk liquid storage terminal. *[Footnote: Renewable Energy Group, Inc. headquartered in Ames, Iowa acquired substantially all ITS assets in August 2015, including its 100-million gallon biodiesel refinery and terminal operations at the Port of Grays Harbor. Renewable Energy Group Closes Acquisition of Imperium Renewables. Available at http://www.businesswire.com/news/home/20150819006255/en/Renewable-Energy-Group-Closes-Acquisition-Imperium-Renewables.]* ITS would add nine storage tanks with a total capacity of 30.2 million gallons of crude oil. A maximum of 1.26 billion gallons would be unloaded from 730 unit trains, stored, and transferred to 400 tank vessels.

Grays Harbor Rail Terminal, LLC (GHRT) is proposing a new bulk liquid storage facility. The new facility would accommodate the receipt of 45,000 barrels per day of crude oil. An average of 365 unit trains would deliver oil. The oil would be loaded onto a maximum of 120 tank vessels per year.

Following completed expansion projects the total throughput for Westway and Imperium would be 2.07 billion gallons of crude oil per year. 1,188 unit trains would be unloaded for transfer to 638 large tank vessels.

INTRODUCTION

In September 2015 the Quinault Indian Nation (QIN) retained Resource Dimensions of Gig Harbor, Washington to conduct an independent external peer review of Draft Environmental Impact Statements (DEISs) published August 31, 2015 for the proposed WTC and ITS projects at the PGH in Hoquiam, Washington.

The sections of the Westway DEIS reviewed by Resource Dimensions were:

- Section 3.12, Tribal Resources (for reference only)
- Chapter 7, Economics, Social Policy, and Cost-Benefit Analysis
- Appendix O, Economic Impact Analysis
- Appendix P, Census Block Group Data

The sections of the Imperium DEIS reviewed by Resource Dimensions were:

- Section 3.12, Tribal Resources (for reference only)
- Chapter 7, Economics, Social Policy, and Cost-Benefit Analysis
- Appendix O, Economic Impact Analysis
- Appendix P, Census Block Group Data

ICF International (ICF) prepared the DEISs for both project proponents. ECONorthwest, an Oregon-based economics consulting firm, prepared the economic impact analysis incorporated as Appendix O in both DEISs in October 2014. This study was a joint effort by the project proponents.

PURPOSE OF INDEPENDENT REVIEW

Generally, the purpose of this independent peer review is to assess the quality and credibility of the DEIS decision documents prepared for the WTC and ITS projects. Specifically, the review addresses the DEISs' accuracy, completeness, consistency, and technical soundness of methods and analyses used to asses economic, social, and cultural impacts. Further, we have addressed environmental impacts to the extent that they have accompanying socio-economic impacts.

In conducting the review of the DEISs the following questions are considered:

5. Are the appropriate methods employed to fully evaluate the extent of economic and social impacts of the proposed projects?
6. Are the reviewed chapters of both DEISs, including the economic impact analysis, internally logical, complete and consistent?
7. Does the analysis of proposed alternatives, in both DEISs, address the impacts of the proposed actions on the local and regional economy specifically for those businesses, fisheries and resulting jobs negatively impacted in the event of a crude oil spill incident?
8. Do the DEISs meet the standard for addressing the potential for project activities to have disproportionately high or adverse human health or environmental effects on minority and/or low-income populations, and Indian tribes in accordance with Executive Order 12898?
9. Do the DEISs adequately address impacts/effects of construction and routine operations on the QIN's utilization of its treaty resources?
10. Do the DEISs appropriately address mitigation measures for potential damage to these treaty resources?

SUMMARY OF INDEPENDENT REVIEW COMMENTS

Table 1 provides a summary outline of comments pertinent to findings of the independent DEIS review. Comments are discussed in order following the summary table.

Table 1. Summary of Independent Review Findings

Issue #	Summary of Review Comments
	Signifiance—High
1.	DEISs fail to include a cumulative impact analysis as a component of the economic impact analysis.
2.	Limited scope of economic impact analysis creates a misleading picture of total economic impacts.
3.	Limited usefulness of the cost benefit analysis conducted.
4.	Failure to employ appropriate methods to determine monetary or quantitative estimates for certain impacts.

5. No attempt to quantify economic impacts or negative externalities of an oil spill.
6. DEISs fail to adequately address impacts of proposed projects on the QIN's use of treaty resources.
7. Numerous inconsistencies, omissions and errors occur throughout both DEIS documents.
8. Limited usefulness of discussion of climate change.
9. Delineation of area with social impacts does not include mention of any Indian tribes present in the area affected by the proposed projects.
10. It is unclear if the proposed mitigation plan will compensate for impacts on environmental resources and/or treaty reserved rights to such resources.
11. The feasibility of the mitigation required to compensate for the impacts on fisheries resources is not demonstrated.

Significance—Medium

12. The cumulative impacts analysis does not consider the value of ecosystem services that have diminished over time.
13. No attempt at quantifying social impacts was made in either DEIS.
14. There are flaws in the reasoning and methods used to analyze impacts to low income and/or minority populations.
15. The cost-benefit analysis is limited to the city of Hoquiam; the city of Aberdeen has similar requirements for cost-benefit analysis in their city code.
16. Impacts to recreation are understated and no attempt to quantify economic impacts is made.
17. There is contradiction between the economic impact analysis and Sections 7.1.4.2 of both DEISs.
18. The cost-benefit analyses presented In the DEISs are of very limited utility for policymaking.

FINDINGS

ANALYTICAL METHODS AND APPROACH

GENERAL COMMENTS

Review of pertinent sections (Economics, Social Policy and Cost-Benefit Analysis) of WTC and ITS DEIS documents reveals the use of identical analytical methods to evaluate the extent of economic and social impac.is of the proposed projects.

Sections 7.1, Economics, of both DEISs present information reported in Appendix O, Economic Impact Analysis. The analytical approach used to conduct the economic impact analysis by the project proponents' consultant (ECONorthwest) is regional economic analysis, carried out using the Impact Analysis for Planning Model (IMPLAN). IMPLAN is commonly used to estimate economic

impacts of a proposed project, event, or a natural or environmental change, or to calculate economic contributions of specific industries. The analytical method and the usefulness and limitations of IMPLAN are reasonably presented**. We find that regional economic impact analysis using the IMPLAN modeling system is a suitable approach to evaluating the extent of economic impacts of the proposed actions.**

Independent review findings are presented below, in the order outlined in Table 1.

REVIEW FINDINGS

Insufficiencies

1. **Failure to include a cumulative impact analysis.** Applicants fail to include a cumulative impact analysis as a component of the economic impact analysis. WAC 197-11-792(2)(c)(iii) states that impacts of the proposed actions may also be cumulative. Further, the Washington State Department of Ecology's (DOE's) Frequently Asked Questions about SEPA page states: "The EIS should look at how the impacts of the proposal will contribute toward the total impact of development in the region over time." *[Footnote: DOE. Frequently Asked Questions about SEPA. Accessed September 30, 2015. Available at: http://www.ecy.wa.gov/programs/sea/sepa/faq.htm.]* We contend that revenue losses due to rail traffic and vessel traffic attributable to both projects should be considered cumulatively as well as individually.

Response T8-215

Responses to the summary points (1 through 18) are addressed in the responses to comments in the body of this letter.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment T8-216

2. **Limited scope of economic impact analysis.** Section 7.1, Economics, includes only positive economic benefits of proposed actions, such as tax revenues and jobs created. This creates a misleading picture of total economic impacts.

Response T8-216

Draft EIS, Section 7.1, *Economics*, provides the regional economic context for the proposed action and identifies the employment, income, and economic output. Draft EIS Section 7.3, *Cost-Benefit Analysis*, provides an analysis of the costs and benefits of the proposed action, relevant to the City of Hoquiam. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment T8-217

There are other economic impacts, discussed below, that should be examined to give decision-makers an accurate understanding of potential impacts of the WTC and ITS projects on local economies.

WAC 197-11-440(6)(a) states that the affected environment, significant impacts, and mitigation measures section of an EIS shall "analyze significant impacts of alternatives including the proposed action."

Other adverse impacts identified by applicants have economic consequences:

- Vessel interruptions to treaty and commercial fishers (WTC pg. 3.12-20; ITS pg. 3.12-19),

Response T8-217

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment T8-218

- Delays and compromised access to the Olympic Gateway Plaza (WTC pg. 3.15-27; ITS pg. 3.15-27),
- Presence of ecosystem services that could be damaged by rail and vessel traffic (WTC pg. 3.3-16; ITS pg. 3.3-16),

Response T8-218

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment T8-219

- Additional training and equipment for first responders (WTC pg. 4.2-8; ITS pg. 4.2-8), and

Response T8-219

Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns*, discusses costs for training or equipment needed to better prepare local responders to handle the increased risk of oil spills or hazardous material releases.

Comment T8-220

- Disrupted recreation activities (WTC pg. 3.10-15; ITS pg. 10-15).

Related to rail and vessel operations, both DEIS documents state that vehicle traffic and safety with regard to access into the Olympic Gateway Plaza and the industrial area near the project sites would substantially worsen, and that the "adverse impacts would likely remain unavoidable and significant" (pages 7-22).

In the subsequent Vessel section, both DEISs state, "increased vessel traffic would disrupt commercial fishing and tribal fishing that occurs along the navigation channel. Transiting vessels related to the proposed action would limit the timing, duration, and physical area that could be fished. Proposed mitigation providing advance notice of incoming vessels related to the proposed action could help reduce potential conflicts, but would still likely result in some disturbances."

While each applicant DEIS identifies such adverse impacts relative to proposed actions, neither addresses the impacts on the local and regional economy, let alone specifically for those businesses, fisheries and resulting jobs positively or negatively impacted in the event of an oil spill.

The economic contributions of commercial fishing, tribal and non-tribal, on the region's economy cannot be understated. We summarize below from recently completed studies.

Response T8-220

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment T8-221

Commercial Fishing

The QIN has registered many concerns about how the proposed action could interfere with treaty fishing activities. The DEISs discuss some of these impacts (see ITS and WTC Section 3.12.5), but do not consider possible economic impacts. Quinault treaty fishing activities represent not only subsistence and cultural values, but an important revenue source for tribal commercial fishers. Quinault fishing activities have the following economic impacts (direct, indirect, and induced) on the Grays Harbor County economy:

- 355.5 jobs,
- $12.3 million in personal income,
- $28.8 million in business revenue, and
- $9.67 million in local purchases. *[Footnote: Resource Dimensions. 2015. Economic Impacts of Crude Oil Transport on the Quinault Indian Nation and the Local Economy. Available at http://earthjustice.org/sites/default/files/files/Letter%20Maia%20Bellon%20at%20Ecology%20re%20Economic%20Report%20Attachment.pdf.]*

Resource Dimensions estimates that at the low end of the scale (minor disruptions in business activities), rail and vessel traffic could cost tribal members 5% of their annual income due to rail delays and 2.9% of their income from disrupted fishing activities.

Non-treaty commercial fishing and aquaculture activities in the county have additional economic impacts (direct, indirect, and induced) on Grays Harbor County's economy:

- 1,099.6 jobs,
- $37 million in personal income,

- $81.5 million in business revenue,
- $37.2 million in local purchases, and
- $4.2 million in tax revenue. *[Footnote: Resource Dimensions. 2015. Economic Impacts of Crude Oil Transport on the Grays Harbor Economy. Available at http://www.fogh.org/pdf/FOGH_Economic_Impacts_Crude_Oil_Transport.pdf.]*

The magnitude of these business activities indicates that economic damages from fisheries disruptions could be substantial. **Additional study is warranted. Analysis of alternatives does not capture potential impacts on the local and regional economy.**

As the applicants state that significant adverse impacts to businesses in Aberdeen and Hoquiam would occur as a result of rail operations, and adverse impacts to commercial and tribal fishers would occur as a result of vessel operations, **Resource Dimensions contends that the applicants have failed to quantify potential revenue losses resulting from the proposed actions. Further, the applicants have failed to fulfill the standard of Hoquiam Municipal Code 11.10.160 to quantify economic impacts.** *[Footnote: Hoquiam City Code. Chapter 11.10 State Environmental Policy Act. Article IV. Environmental Impact Statement (EIS) §11.10.160 Additional elements to be covered in an EIS. "The following additional elements are part of the environment for the purpose of EIS content, but do not add to the criteria for threshold determinations or perform any other function or purpose under this chapter: (1) Economy; (2) Social policy analysis; (3) Cost-benefit analysis. (Ord. 84-23 § 2, 1984)." Current as of Ordinance 14-20, Nov.17, 2014. Available at: http://cityofhoquiam.com/code/Hoquiam11/Hoquiam1110.html#11.10.160.]*

Response T8-221

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment T8-222

Disrupted Business Activities

The DEISs mention in several places that access to the Olympic Gateway Plaza will suffer because of increased rail traffic and associated delays and blockages at crossings in the area. The narrative of Section 3.15 says that crossings to the Olympic Gateway Plaza (without re-routing) would be blocked by about an hour more every day. The feasibility of re-routing is not studied in the DEIS (it is suggested that crossings at the east end of the plaza would be blocked for less time than west end crossings, but analysis of total time lost- some blocked crossing time plus re-route time - is not included).

Using reported numbers (Table 3.15-11), access to the Olympic Gateway Plaza would be blocked by up to 16.1 hours every week. Olympic Gateway Plaza businesses could lose revenue as customers substitute other businesses to avoid delays. Additional losses could be accrued if merchandise delivery is disrupted. A report by the National Cooperative Highway Research Program classifies costs of rail crossing delays (due to accidents) and outlines methods for calculating supply chain and business disruption losses. *[Footnote: National Cooperative Highway Research Program. 2013.*

Comprehensive Costs of Highway-Rail Grade Crossing Crashes. Available at http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_755.pdf.]

Response T8-222

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment T8-223

Lost Ecosystem Services

Chapter 3 provides information on possible environmental damage from the proposed actions. Chapter 7, however, does not estimate possible economic consequences of environmental damage. Substantial costs may be associated with the restoration of or loss of ecosystem services.

The project proponents made no attempt to quantify non-market values for ecosystem services in the economic impact analysis or in the cost-benefit analysis. They should have looked at degraded values of ecosystem services, from the individual projects and from the cumulative impacts of projects.

Another useful analysis the project proponents could have conducted was an ecosystem service valuation. Resource Dimensions conducted an ecosystem service valuation for the Friends of Grays Harbor (FOGH) that evaluated the loss of value provided by lost or damaged ecosystem services in the PGH area due to an oil spill. Such an analysis could inform area residents about how much they might need to pay to replace lost or damaged services provided by nature.

Response T8-223

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment T8-224

Specialized Training and Equipment for First Responders

Grays Harbor County first responders require additional training to safely respond to a rail or vessel accident involving crude oil. According to a recent article, several major cities, including Sacramento, CA, New Orleans, LA, and Milwaukee, WI, have sent firefighters to specialized crude-by-rail training hosted by the Security and Emergency Response Training Center in Pueblo, CO. *[Footnote: Hislop, M. 2015. Oil trains: How American cities are preparing for 'catastrophic derailment'. Available at http://theamericanenergynews.com/energy-news/oil-trains-how-american-cities-are-preparing-for-catastrophicderailment.]* The cost for the Pueblo training course is $1,550 per person, plus travel expenses. *[Footnote: Security and Emergency Response Training Center. 2015. Crude by rail emergency response. Available at http://sertc.org/courses/crude-by-rail-emergency-response-cbr/s.]* It is unlikely that local fire departments could afford that or similar training (Hoquiam laid off four firefighters in 2014 due to budget shortfalls), creating a dangerous situation for citizens and first responders*. [Footnote: Dickson, A. 2014. Budget woes prompt Hoquiam Fire Department layoffs.*

Available at http://thedailyworld.com/news/local/budget-woes-prompt-hoquiam-fire-department-layoffs.] Note, such training does not include additional costs for local, multi-agency crude oil emergency training.

Response T8-224

Costs that may be incurred by the City of Hoquiam for emergency response training are discussed in Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety,* consistent with the approach discussed in the Master Response for Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-225

Additionally, specialized equipment is needed to safely respond to crude-by-rail accidents. The DOE Report on Marine and Rail Oil Transportation estimated that $4.6 million is needed to provide specialized crude-by-rail equipment to Washington fire departments (cost does not include equipment-specific training). *[Footnote: DOE. 2015. 2014 Marine and Rail Oil Transportation Study. Available at https://fortress.wa.gov/ecy/publications/documents/1508010.pdf .]*

The state spent $1.45 million (from a grant) to place crude oil emergency equipment caches across the state and train first responders on use. There is a cache located near Grays Harbor. The caches, however, were tailored to 2006 risks, before existing and proposed increases in crude oil transport. The grant did not provide funding for ongoing training and equipment updates. As a result, first responders have stated that they feel unprepared and untrained to safely respond to a crude-by-rail emergency. *[Footnote: Ibid.]*

Response T8-225

Costs that may be incurred by the City of Hoquiam for emergency response training are discussed in Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety,* consistent with the approach discussed in the Master Response for Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-226

Disrupted Recreation Activities

ITS and WTC Sections 3.10, Recreation, state that recreation impacts are possible, but will likely be low. The DEISs provide a limited analysis of recreation impacts; only direct impacts caused by rail and vessel traffic are considered.

Resource Dimensions estimates that tourism and recreation in Grays Harbor County has the following economic impacts:

- 2,651 jobs,
- $91.1 million in personal income,
- $245.8 million in business revenue,
- $106 million in local purchases, and

- $28 million in state and local taxes. *[Footnote: Resource Dimensions. 2015. Economic Impacts of Crude Oil Transport on the Grays Harbor Economy. Available at http://www.fogh.org/pdf/FOGH_Economic_Impacts_Crude_Oil_Transport.pdf.]*

Given the importance of recreation-based tourism to the region, impacts to the recreation industry should be thoroughly explored.

Response T8-226

The Draft EIS Chapter 3, Section 3.10, *Recreation,* analysis of potential impacts on recreation from the construction and routine operation of the proposed action finds the potential for impacts to be low.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. This includes information on derailments and other accidents involving trains carrying crude oil and information on a crude oil spill during marine transport. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment T8-227

3. **Cost benefit analysis, as conducted, is of limited use.** WAC 197-11-726 states that a "Cost-benefit analysis means a quantified comparison of costs and benefits generally expressed in monetary or numerical terms." Sections 7.3, Cost-Benefit Analysis, for both projects reported the results of cost-benefit analyses. WAC 197-11-450 states that no cost-benefit analysis is not required by SEPA.... For purposes of complying with SEPA, the weighing of the merits and drawbacks of the various [environmentally different] alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations." Yet, a cost-benefit analysis has purportedly conducted. As such, the analysis cannot be misleading and must be done adequately to provide a quantified comparison of costs and benefits associated with project alternatives.

   A cost-benefit analysis is a common tool used by policymakers to evaluate proposed policies and actions. Cost-benefit analysis is at root an attempt to identify and express, in dollars, all of the effects of proposed policies or projects. For example, a particular project can result in positive impacts, or benefits, for some people, and at the same time negative impacts, or costs, for others. Thus, assessing who are the gainers and losers from a project or changed policy- that is, who bears the costs and who reaps the benefits, and to what extent- is the essence of cost-benefit analysis.

   Sections 7.3, Cost-Benefit Analysis, state that the scope of the analysis is limited to potential costs and benefits to the residents of Hoquiam. The proposed projects and their associated operations affect many more populations than only the residents of Hoquiam. While this is the prerogative of the applicants, we contend that the limited scope obviates the usefulness of the discussion in that it

lacks a robust accounting of costs and benefits of either proposed project.

For example, the city of Aberdeen has requirements similar to the city of Hoquiam for analyzing economic and social impacts for projects with significant environmental impacts. *[Footnote: [Footnote 14: City of Aberdeen. 2014. City of Aberdeen, Washington Municipal Code. Available at http://www.aberdeenwa.gov/government/aberdeen-municipal-code/.]* Costs to Aberdeen from rail traffic will likely be substantial. 17,845 vehicles are predicted at the Port Industrial Road crossing in 2017. Just for WTC, predicted delays increase from 14 minutes to 39 minutes daily, or an additional152 hours/year (WTC pg. 3.15-17). If only 1% of crossing users are delayed for the full duration of the blocked crossing, residents would accrue $262,000 to $439,000 per year in delay costs just at one crossing (using delay values from Section 7.3).

The DEISs state that It is often not possible to "ascribe a monetary value to all relevant impacts because some impacts are difficult to quantify, and other impacts, even if they can be quantified, are difficult to express in monetary terms." As the DEIS documents present and discuss impacts that cannot be monetized only on a qualitative basis, and further only consider costs and benefits to Hoquiam residents, we contend that the cost-benefit analyses presented in the DEISs are of very limited utility for policymaking.

With respect to those sections addressing social impacts of both DEISs we find that qualitative social impact analysis is a reasonable evaluative approach in the lack of specific guidance or an industry standard as to how social impacts should be assessed. Yet, it should be noted that no attempt at quantifying social impacts was made in either DEIS.

Response T8-227

Refer to the Master Response Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-228

4. Failure to employ appropriate methods to provide monetary estimates for certain impacts. The City of Hoquiam Scope of Work (SOW) instructs ICF to do the following:

   "To provide monetary estimates for the impacts of the proposed projects, the Contractor will use a benefit transfer method called value transfer, which involves taking values estimated from other studies, or averages of a range of values from other studies, and adapting them to match the new context to which the values will be applied." [Footnote: City of Hoquiam. 2014. Scope of Work Westway and Imperium Renewables Expansion Projects EISs. Available at http://cityofhoquiam.com/wp-content/uploads/2014/06/Westway-and-Imperium-Renewables-Expansion-Projects-EIS-Scope-of-Work.pdf.]

   While the SOW acknowledges that not all impacts can be monetized and therefore must be discussed qualitatively, the DEISs do not use benefit transfer to monetize any impacts. Some of the reasons given for not monetizing impacts are the very issues that the benefit transfer method is designed to accommodate. For example, page 7-39 of the DEISs include a discussion of possible reductions in property values caused by increased rail traffic. Paragraph 2 lists two difficulties in applying quantitative values from previous studies to the proposed action: 1) distances from rail lines in previous studies are less than in the study area and 2), other studies involve a larger increase in rail

traffic. Benefit transfer methods are designed to statistically account for just such differences. Benefit transfer could also be used to monetize potential costs related to environmental health and safety concerns (Section 7.3.4.2). Numerous studies have monetized damages from crude oil spills.

Even where attempts are made to monetize costs (e.g., Section 7.3.4.1 Potential Costs Related to Increased Vehicle Traffic and Safety, ITS and WTC pg. 7-35), the analysis does not include meaningful summaries or cost totals. For example, the DEISs include values for traffic accidents and time lost in traffic. The analysis, however, does not estimate a range of potential costs based on Hoquiam traffic patterns and populations. Instead, both DEIS documents have the following statement:

It is not possible to estimate how much commuting time would increase for these residents because it is not possible to know what specific roads would be taken or what share Hoquiam residents would represent of the vehicles on roads affected by delays during commuting times" (ITS and WTC pg. 7-35}.

A thorough traffic analysis to precisely monetize traffic delay or accident costs is indeed outside the scope of the DEISs. A range of possible costs, however, would be more illustrative than the cost per hour of delayed traffic. For example, the cost of 5% of Hoquiam residents delayed by trains for one hour every week (likely a conservative estimate of potential impacts) would be between $219,000 and $367,000 annually (using costs from ITS pg. 7-35). If 50% of Hoquiam residents are delayed for one hour every week the cost would be between $2.2 million and $3.7 million annually. If 5% of Hoquiam residents are delayed by 15 minutes every day, the annual cost would be between $384,000 and $642,000. If 50% of Hoquiam residents were delayed by 15 minutes every day, the annual cost would be between $3.8 million and $6.4 million.

These numbers demonstrate the magnitude of possible costs for Hoquiam residents and illustrate that totaled ranges are more meaningful comparisons to total benefits (such as tax revenues and wages) presented in Section 7.3.3 (ITS and WTC pg. 7-31).

The failure to appropriately use benefit transfer methods to quantify certain impacts that can be monetized render the DEISs of little value in providing a clear understanding of the magnitude of possible impacts to area residents or for use in policymaking.

Response T8-228

As noted in the comment, the scope of work indicated that the benefit transfer method would be used when sufficient information was available. However, the ability to successfully conduct benefit transfer is dependent on a number of factors, and care must be taken in conducting benefit transfers to avoid errors and bias in the resulting values. To conduct a meaningful benefit-transfer analysis, the potential impacts must characterized at a sufficient level of detail and there must be applicable sources of other studies where similar costs were calculated.

In relation to impacts on property values, studies commonly use hedonic pricing methods to estimate the impact of rail lines (and other potential dis-amenities) on property values. Hedonic pricing studies use data on real estate transactions to isolate the value of environmental attributes of properties by comparing prices of comparable properties with and without these amenities. Hedonic pricing studies are very sensitive to the geographic location where the study takes place. Therefore, if studies evaluating costs in similar geographic areas are not readily available, it can be problematic to use them as a source data for benefit transfers. For example, property owners in one

housing market often value housing characteristics in inherently different ways than property owners in other markets. This sensitivity of hedonic pricing functions to the particular real estate market for which they were estimated greatly complicates the process of using hedonic pricing studies as source data for benefit transfers. Due to the potential for errors from conducting benefit transfers using hedonic pricing studies, the analysis instead presents information on the range of potential impacts on property values from rail lines based on a review of other studies.

In regard to the use of benefit transfer to monetize other health and safety concerns, as noted previously, the approach (refer to Master Response for Environmental Health and Safety Analysis) used in the analysis of risks of spills, fires, and explosions evaluated the potential impacts of different spill scenarios. It is challenging to use benefit transfer in this case because the potential health and safety impacts of the proposed project vary greatly depending on the specific circumstances of each incident. In the absence of being able to use benefit transfer to monetize the specific project impacts, the Final EIS includes information on impacts that have resulted from previous spills involving rail cars and spills in marine environments as presented in Chapter 7, Section 7.3.4.2.

In response to the suggestion that ranges should be given for potential costs of traffic delays, the analysis does provide a range for the total potential costs of traffic delays. These are based on the uncertainties around the traffic delays that would result from the proposed action (as discussed in Section 3.16, *Vehicle Traffic and Safety*) and the uncertainties around the traffic delays that would be experienced by residents of the City of Hoquiam. This distinction is important because of the bounds drawn around the cost-benefit analysis by the SEPA policies of the City of Hoquiam.

For additional information about the requirement for, scope of, and analysis of costs, refer to Master Response for the Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-229

5. Economic impact analysis does not quantify the economic impacts or include quantification of negative externalities associated with a potential oil spill. The risks of hazardous materials releases to the environment from rail, vessel, or onsite operations attributable to the proposed projects are discussed in Chapter 4 of both DEISs. Crude oil spills are one type of hazardous material release that may have significant adverse effects on the environment. Yet, neither DEIS addresses the economic impacts for those businesses, fisheries and resulting jobs impacted positively or negatively in the event of an oil spill. As with previous comments, we find that the failure to address the economic impacts associated with a potential oil spill provides an incomplete picture of possible economic impacts, which prove the DEISs flawed and of little value in policymaking.

   Resource Dimensions quantified potential economic impacts from an oil spill attributable to rail and vessel operations of the proposed projects in separate reports for the QIN *[Footnote: Ibid. P. 8]* and FOGH *[Footnote: Ibid. P. 8]*

   Treaty fisheries-based activities (fishing, processing, and fisheries management) would suffer the following losses:

   - 105.6 to 151.7 jobs,
   - $12.9 to $17.1 million in personal income,
   - $24.2 to $40.7 million in business revenue, and

- $8.1to $12.6 million in local purchases.

Additional losses would affect non-treaty commercial fishers:

- 366.6 to 494.6 jobs,
- $42.8 to $56.3 million in personal income,
- $83.8 to $112.9 million in business revenue,
- $42.3 to 54.8 million in local purchases, and
- $4.4 to $6 million in tax revenue.

Tribal businesses would lose the following:

- 12.5 to 77.7 jobs,
- $1.9 to $11.1 million in personal income,
- $4.8 to $29.8 million in business revenue, and
- $2.3 to $10.9 million in local purchases.

County businesses serving tourists and recreationists would lose an additional:

- 480.2 to 616.8 jobs,
- $55.8 to $72.2 million in personal income,
- $151.2 to $196 million in business revenue,
- $63.9 to $83.6 million in local purchases, and
- $16.5 to $21.8 million in tax revenue.

The DEISs analyze train, tank, and vessel spill risk for minor to major spills. Stated spill risk (for ITS) ranges from once every 5 years (a small vessel loading spill) to once every 6,300 years (a large rail spill). However, stated oil spill risk is inconsistent throughout the documents. Some places state that spill risk will increase (e.g., ITS pg. 5-28, pg. 7-27, and throughout Chapter 4), in other places the DEISs state that the risk of a large oil spill is low, and many other places state that the risk of any oil spill is low (e.g., ITS pgs. 3.5-23, 4.5-16, 6-64, 7-14, 7-23, 7-27, and 7-28).

The statement that the risk of an oil spill is low is contradicted by the graphs in Chapter 4. The following spill scenarios have graph indicators in the likely range:

- Small spill during rail unloading,
- Small vessel loading spill,
- Medium vessel loading spill,
- Small to medium spill during rail transport,
- Large spill from vessel collision, and
- Large spill from vessel allision at the mouth of Grays Harbor.

All of the spills listed above, except a small spill during rail unloading and small to medium spills during rail transport, are likely to reach water.

The stated oil spill risk for large incidents, such as spills from a vessel that would have high environmental and economic damages (such as those listed above), is low (while the graphs show otherwise). The study fails to enumerate, however, that while the risk may be low (if one considers once every 74 years low), the risk is substantially increased under the proposed action. The risk of a large spill from a vessel collision goes from once every 2,100 years to once every 74 years. That means that the risk of a large spill is almost 30 times more likely under the proposed action. The risk of a large spill from vessel grounding goes from once every 7,900 years to once every 270 (although there seems to be an error in the risk bullets on ITS pg. 4.6-5). The risk of a vessel-grounding spill is also almost 30 times more likely.

The risk analysis also fails to acknowledge the cumulative increase in the risk of a large crude oil spill in the study area - a combined risk from the presence of crude oil being transported by rail, stored, and loaded onto vessels. The risk of a spill in any one of those three places would be higher than any individually stated risk.

As an oil spill is a potentially significant impact of the proposed actions of both applicants, we find that the applicants have not fulfilled the standard of WAC 197-11-440(6)(c)(ii).

Response T8-229

As noted previously, the risks are not combined for the reasons discussed in the Master Response for Environmental Health and Safety. For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

As noted previously, the approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment T8-230

6. **The DEISs fail to adequately address impacts of proposed projects on the QIN's use of treaty resources.** Sections 7.2, Social Policy, of both DEISs have been prepared in accordance with Hoquiam Municipal Code §11.10.160, to describe the principal features of the environment that would be affected by the alternatives, including the proposals under consideration, and to describe and discuss significant impacts that will narrow the range or degree of beneficial uses of the environment. *[Footnote: Ibid. P. 9.]* Review of Sections 7.2 focused on determining whether the applicants fulfilled these regulatory obligations with respect to assessing the impacts or adverse effects of construction and routine operations on the QIN's use of its treaty resources.

We find that neither applicant identified impacts or adverse effects relative to construction of the proposed projects on the QIN's treaty resources.

WTC and ITS both identify that onsite operations would "reduce access to fishing areas immediately adjacent to the dock as result of increased frequency of vessels docked at the Terminal1 berth." These fishing areas are known to be used by QIN treaty commercial fishers.

However, both DEISs fail to state that increased rail traffic associated with the proposed operations could interrupt or delay QIN access to fishing areas located east of the mouth of the Chehalis River. These fishing areas are known to the applicants and are described in Sections 3.12.4.3. The potential for economic losses to QIN treaty commercial fishers resulting from interrupted or delays access to fishing areas or fish buyers is described in Resource Dimensions (2015). *[Footnote: Ibid. P. 8.]*

Both DEISs state that "increased vessel traffic would disrupt commercial fishing and tribal fishing that occurs along the navigation channel. Transiting vessels related to the proposed action would limit the timing, duration, and physical area that could be fished. Proposed mitigation providing advance notice of incoming vessels related to the proposed action could help reduce potential conflicts, but would still likely result in some disturbances" (ITS and WTC pg. 7-22).

We find this to be a reasonable statement; however, as described previously **contend that the applicants should have made an effort to quantify the economic losses anticipated as a result of these disruptions.**

Both DEISs state that if because of onsite operations ". . . crude oil entered the environment, environmental degradation could occur that could adversely affect humans and the natural environment" (ITS and WTC pg. 7-23). Further, they state, "no mitigation measures would eliminate the possibility of a large spill or explosion, nor would they eliminate the adverse consequences of a large spill or explosion. Additionally, the perception of increased risks and concerns over the potential for environmental damage may also cause some individuals concern they would otherwise not have related to these risks."

We contend that these statements are reasonable; however they are blanket statements that do not address impacts or effects of the abilities of QIN members to utilize their treaty resources. **Nor have the applicants quantified the potential economic losses to QIN fishers that could result from these events.**

Regarding rail operations, both DEISs state that, "depending on the location of the [oil spill] incident and the specifics of the outcome....such an event could result in extensive environmental damage" (ITS and WTC pg. 7-24). Further they state, "no mitigation measures would eliminate the possibly of a large spill, fire, or explosion, nor would they eliminate the adverse consequences of a large spill, fire, or explosion."

As with the discussion of onsite operations, **the applicants do not quantify the potential economic losses to QIN fishers that could result from a large spill, fire or explosion due to rail operations.**

With regard to vessel operations, both DEISs state, "increased tank vessel traffic along the navigation channel under the proposed action would result in some conflict with commercial fishing, tribal fishing and recreational vessels" (ITS and WTC pg. 7-25}. **Note that the applicants do not quantify the potential economic losses to QIN fishers that could result from these conflicts.**

Further, both DEISs state, "Increased vessel traffic related to the proposed action could also affect local communities as the result of increased risks of incidents (i.e. vessel collision} and associated spill compared to the no-action alternative....Depending on the location of the incident and specifics of the outcome. . . . such an event could result in extensive environmental damage" (ITS and WTC pg. 7-25). The DEISs again note that, "no mitigation measures would eliminate the possibility of a large spill, fire or explosion."

The applicants do not quantify the potential economic losses to Treaty commercial and subsistence fishers or grass gatherers and weavers that could result from a large spill, fire or explosion resulting from increased vessel traffic.

In the Minority and Low-Income Populations subsection, the applicants acknowledge that "any event that might adversely affect fisheries or natural resources within [Grays Harbor] would cause impacts on tribal resources; namely the Quinault Indian Nation's Usual & Accustomed Fishing Rights and the Chehalis Tribe recreational shellfish area" (ITS and WTC pg. 7-26}. However, such impacts are not described in detail in the context of areas proximate to onsite operations. As previously stated it is known that QIN fishers frequently fish the waters near Terminal!.

With respect to the effects of rail operations on minority and low-income populations and Indian tribes, both DEISs state that depending on the location of a release of hazardous materials into the environment, there is the potential for minority and low-income populations to be adversely affected. **However, specific impacts to QIN members or treaty resources are not described.** Further, the specific census block groups that may be affected are not identified.

Finally, with respect to the effects of vessel operations on minority and low-income populations and Indian tribes, both DEISs state that there is "potential for conflicts with tribal access to usual and accustomed fishing areas....The potential adverse impacts on tribal resources related to access to usual and accustomed fishing areas, would be unavoidable and significant" (ITS and WTC pg. 7- 27).

In the case of vessel collisions or the release of hazardous materials, the DEISs note that significant environmental impacts could occur, and that "depending on the specific location of the event, there is the potential for low-income populations to be disproportionately affected'' (ITS and WTC pg. 7-27}. However, as noted previously, **the applicants do not quantify the potential economic losses to QIN fishers or weavers that could result from a large spill, fire or explosion resulting from increased vessel traffic or hazardous materials releases into the environment.** Further, the specific census block groups of low-income populations that may be affected from these events are not identified.

Response T8-230

Refer to Response to Comment T8-29 regarding determination of impacts on treaty rights. Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic*, indicates increased vehicle delay along the PS&P rail line is

generally minimal and that alternative means of access exist for the majority of areas along the rail line.

For information about the purpose and analysis of economic impacts, refer to the Master Response for the Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-231

INCOMPLETE, INCONSISTENT LOGIC, ERRORS AND OMISSIONS

7. Numerous inconsistencies, omissions and errors occur throughout both DEIS documents. Listed below, by DEIS section and subsections, are those identified through our independent review.

    a) **Section 7.1, Economics.** Sections 7.1.3 of both DEISs, What are the economic conditions in the study area?, describe the regional economic conditions that could be affected by construction and routine operation of the proposed projects. Other useful topics omitted are historic and projected populations of the study area, as population growth is discussed in Section 7.2; business patterns of Grays Harbor County, an element of economic impact modeling; and recent and projected job growth in Grays Harbor County, which is also an element of economic impact modeling.

Response T8-231

Refer to the Master Response for the Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-232

In Section 7.12 of both DEIS documents, the title of Appendix 0 is incorrectly given as *Census Block Group Data*, when it should be *Economic Impact Analysis.*

Response T8-232

The Final EIS has been updated to correct the reference to the *Economic Impact Analysis*.

Comment T8-233

In Table 7.2 of both DEISs, it is unclear if the dollar values have been normalized to one year, or if they are reported for each year without adjusting for inflation. This is also true for the dollar values presented in Table 7.4. If the dollars values in Table 7.4 have not been normalized to one year, the 'Percent Change 2004-2012' percentages are incorrect.

Response T8-233

Final EIS Table 7.2 has been revised to reflect that annual per capita personal income for years 2003 to 2012 is reported in current dollars and not adjusted for inflation.

Comment T8-234

Sections 7.12 of both DEISs state . . .the ratio of the total effect to the direct effect is catted a multiplier.... Further in Table 7.5 of the WTC DEIS, note (a) mentions “The employment multiplier (ratio of the total effect to the direct effect). . . ” This explanation of multiplier analysis is contrary to that presented on page 35 of Appendix 0, where the discussion of multiplier estimation is

appropriate. We assume that the correct application is used in the economic impact analysis. However, this inconsistency suggests that the presentation of multipliers in Tables 7-5 of both DEISs and discussion of multiplier analysis is inaccurate.

Response T8-234

Appendix O, *Economic Impact Analysis*, considers a variety of economic multipliers consistent with the employment multiplier as a representation of the number of jobs affected due to a change in the base industry, as discussed in Draft EIS Chapter 7, Section 7.1.2, *How were impacts on economic conditions evaluated?* Both definitions of a multiplier effect are correct and appropriate, and the multiplier effects are correctly analyzed in the study.

Comment T8-235

Table 7-6 of the ITS DEIS should report $3,274,100.

Response T8-235

Comments specific to the REG (formerly Imperium Terminal Services) Expansion Project Draft EIS would be addressed in responses to comments in the Final EIS for that project.

Comment T8-236

The economic impacts from construction are discussed in Section 7.1.4.2 of both DEISs. However, only Phase 1 economic impacts are presented for each proposed project. Phase 2 economic impacts associated with proposed project construction should also be presented. The only mention that Phase 2 economic Impacts were estimated is found in the last sentence of the 'Construction' subsection. For example, the bottom of page 7-6 in the WTC DEIS states: "*As mentioned above, construction of Phase 2 is estimated to cost an additional $20.4 million. The economic impacts associated with Phase 2 construction would be similar to but slightly less than described far Phase 1.*"

Page 7-7, paragraph three of the ITS DEIS states: *"One-third of this spending ($4.5 million) would be attributed to the applicant, and the remaining two-thirds ($8.0 million) would be attributed to the rail and vessel transport operators."* These two figures sum to only $12.5 million, not $18.4 million as suggested in the preceding sentence.

Response T8-236

As indicated in Draft EIS Chapter 7, Section 7.1.4.2, *Proposed Action*, the economic impacts associated with Phase 2 construction would be similar to but slightly less than described for Phase 1. Further elaboration in the Draft EIS is not required. Full Phase 2 economic impacts are available in Appendix O, *Economic Impact Analysis*.

Comment T8-237

Page 7-7, paragraph four of both DEISs state*: "Essentially, all business taxes and net business income related to onsite operations and income earned by rail and vessel operators would leave Grays Harbor County and would not result in regional employment or income."* This statement is in conflict with the presentation in Appendix 0, Economic Impact Analysis, where it is reported that business taxes and much of the net business income related to onsite operations would not leave Grays Harbor County.

For example, the 'Geography' subsection of Appendix 0 (page 9) states: *"Operating supplies, such as utilities and maintenance services, are most likely going to be locally soured. The same is true for labor because a terminal offers long-term employment. Workers overwhelmingly will reside close by."*

Response T8-237

Draft EIS, Chapter 7, Section 7.1.3, *What are the economic conditions in the study area?* and Appendix O, *Economic Impact Analysis*, discuss regional economic conditions as well as historic and projected population, business patterns, and job growth in Grays Harbor County. Table 7-6 reports estimated tax revenues from Phase 1 construction in 2013 dollars, consisting of property tax, sales tax, and business and occupation tax. Property, sales, and business and occupation tax total to $2,655,700 and are consistent with results presented in Appendix O. Revenues are approximated in the IMPLAN model using data provided at the time of analysis and may change as the proposed action evolves. Appendix O also contains information about the geographic distribution of proposed action benefits as discussed in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*. Benefits to rail and vessel operations are likely to accrue outside of Grays Harbor County, although some employment and associated income and tax revenue is likely to remain in the community directly surrounding the project site. The economic impact analysis is unable to predict the precise number of jobs that will go to local residents but does expect some level of employment and income gains in the region at full buildout.

Comment T8-238

b) **Sections 7.2, Social Policy.** Section 7.2.2.2, *Impact Analysis* (pages 7-9 of both DEISs) defines four social policy elements included in the evaluation of impacts of the proposed actions on the natural and built environments. The definition of the 'community welfare' element *explains "the evaluation of impacts on community welfare considered how impacts of the proposed action described in Chapter 3 could affect human health and welfare. However, economic welfare, an important and significant component of both human and community welfare was not considered in the social impact analyses."* We contend that the omission of economic welfare precludes conducting accurate analyses of the *"significant impacts of alternatives including the proposed action"* as set forth in WAC 197-11-440(6)(a).

Response T8-238

Refer to the Master Response for the Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-239

The last sentence of Section 7.2.2.2, *Impact Analysis* (pages 7-9 in both DEISs) states "*low-income* populations include those living below poverty." The measure of 'below poverty', however, is not described in either document. Further, the definition of 'poverty' used is also not addressed. Given the data used for these sections is the United States Census Bureau's 2009-2013 American Community Survey, we assume that the Census Bureau's definition of poverty is used by ICF, and that 'living below poverty' means living below the poverty line as defined by the Census Bureau for 2013. This is problematic because the 'poverty line' varies year-to-year, based on national estimates. Thus, these analyses can over- or underestimate percentages of populations for individual census block groups and lead to the over- or understatement of project impacts.

Response T8-239

Draft EIS Chapter 7, Section 7.2.2.2, *Impact Analysis*, considers a population to be low-income if the percentage of low-income individuals in any given census block group was greater than the percentage of that population at the county level (the study area spans three counties; the census block groups were evaluated against the county in which they were located). This provides for a conservative analysis. For this analysis, low-income populations include those living below the annual statistical poverty thresholds established by the U.S. Bureau of the Census.

Comment T8-240

Pages 7-24 in both documents state that the possibilities and adverse consequences of large fires, spills or explosions attributable to rail operations *"could shape the perception that the communities in the study area are unsafe, unhealthy or undesirable. These perceptions could affect community welfare whether or not there is a measurable impact on community resources or a substantial increase in risks related to the proposed action."* However, the applicant's DEIS documents do not explain how or in what ways community welfare may be adversely affected from this. For example, risk avoidance behavior may adversely affect community livability and economic development, which in turn have economic repercussions.

Response T8-240

Refer to the Master Response for the Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-241

Pages 7-26 of both DEISs discuss adverse impacts to minority and low-income populations from noise and vibration created by rail operations. Sections 7.3.4.3, Potential Impacts on Property Values, of both DEISs consider the impacts on property values resulting from increased rail operations. Housing attributes considered in the references ICF presents included increased ambient noise and vibration due to rail traffic.

Though the applicants acknowledge several disproportionate adverse effects on minority and low-income populations due to rail operations, they do not mention whether the property values of these populations are likely be disproportionately adversely affected as well.

Response T8-241

Final EIS Chapter 7, Section 7.2.4.2., *Proposed Action*, has been revised to disclose that potential impacts related to property value declines could disproportionately affect low income and minority communities.

Comment T8-242

c) **Sections 7.3, Cost-Benefit Analysis.** Sections 7.3.2.2, *Impact Analysis*, fail to address two significant limitations of these cost-benefit analyses. First, social acceptance of a decision based on cost-benefit analysis typically depends on general consensus that the baseline created for the analysis is accurate. In these cases, no vetting has occurred to ensure the accuracy of baseline information and avoidance of bias. Second, robust cost-benefit analyses identify a range of policy alternatives, and opportunity costs for each alternative are

estimated under various scenarios. In this case, the respective DEISs evaluate only one scenario and no alternatives are assessed.

Response T8-242

Refer to the Master Response for the Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-243

Pages 7-29 of both DEIS documents state that *"the cost-benefit analysis considers costs that may accrue to the City of Hoquiam related to preparing for the potential consequences [of an environmental outcome such as a hazardous materials release] rather than costs that may be incurred related to cleanup activities and related degradation."* We find this a serious limitation of these analyses, as the costs associated with preparing for potential consequences will pale in comparison to costs incurred for cleanup activities and the related degradation. Various scenarios and alternatives could be constructed to estimate any of these costs.

Response T8-243

Refer to the Master Response for the Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-244

Pages 7-30 of both DEISs state, "*in general these impacts would be low either before or after implementation of the recommended mitigation. Because the proposed action would have low impacts on most resources, there would be no measurable benefits or costs to the residents of Hoquiam from those impacts and they are not discussed further in this analysis."* These statements are a shortsighted and curt dismissal of the value of non-market services (ecosystem services). Hoquiam residents enjoy various ecosystem services provided by the affected area. *[Footnote: Pages 7-30:"Costs and benefits to the residents of Hoquiam would also result to the extent that the proposed action would affect employment and income, leisure, and non-market values".]* Were the quality of these services to be interrupted or otherwise impinged upon for any duration, Hoquiam residents would ultimately pay a cost to replace them. No matter the magnitude of the costs, they should be included in these cost-benefit analyses.

Response T8-244

Refer to the Master Response for the Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-245

Sections 7.3.3 of both DEISs, What are the benefits of the proposed action?, describe the ". . . beneficial impacts of the proposed action that could occur in the study area." The calculations of benefits lack consideration of uncertainty. For example, what are the effects on proposed project-related benefits if commodity prices increase or decrease? Again, no alternatives are included in the cost-benefit analyses, severely limiting their utility.

Response T8-245

Refer to the Master Response for the Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-246

In Sections 7.3.3.2, Fiscal Revenues to the City of Hoquiam, of both DEISs, sales and use taxes generated by the proposed projects are discussed. These discussions terminate with the conclusions that "it is not possible to estimate sales and use taxes collected by the City of Hoquiam from construction and operation of the proposed action." Yet, it appears that the DEIS consultants did exactly that in Section 5 of its economic impact analysis (Appendix 0, page 31}. We contend that sales and use tax estimates can and should be deconstructed and analyzed by taxing jurisdiction, as it seems the totals are aggregates of taxes estimated in the analyzed jurisdictions.

Response T8-246

As indicated in Draft EIS Chapter 7, Section 7.3.3.2, *Fiscal Revenues to the City of Hoquiam*, "There is no information on the extent to which service and input providers, during construction or operations, would be located in Hoquiam, or the extent to which earnings associated with construction and operations of the proposed action would be spent in Hoquiam." The table on page 31 of Appendix O, *Economic Impact Analysis,* presents the fiscal impact analysis using county-level tax rates, not local sale/use tax rates.

Comment T8-247

In Sections 7.3.3.2, *Fiscal Revenues to the City of Hoquiam*, of both DEISs, business and occupation taxes generated by the proposed projects are discussed. The DEISs state, "there is not enough information to estimate the business and occupation tax collections by the City of Hoquiam that would be associated with the proposed action. This would require estimating the extent to which construction and operations service and input providers would be located in Hoquiam, as well as the location of establishments where proposed action-related earnings would be spent." In a robust cost-benefit analysis that examines various alternatives, these estimates would be conducted. Further, the locations of establishments where proposed action-related earnings would be spent can be back-calculated using the IMPLAN model and/or estimated using business establishment data provided by the U.S. Census Bureau (current as of mid-2014].

Response T8-247

The purpose of the economic impact analysis, which was conducted using the IMPLAN model, is to assess the economic impacts of the proposed action in the relevant regions within which the impacts will occur. For construction, it was determined that the impacts would largely take place within Washington State given the construction labor pool. For operations, it was determined that the impacts would largely take place within the Grays Harbor County region. Running the IMPLAN model requires acquiring data at various geographic scales, from the state and county level down to the level of individual zip codes, and there are practical limitations to acquiring multiple sets of data and rerunning the model across various levels of geographic specificity. This analysis concluded that, because the impacts of both phases of the proposed action would be realized at the state and county levels, these geographic scales are the appropriate scale for the analysis of the economic impacts.

Comment T8-248

Chapter 7 of each DEIS mentions that commercial fishing, tribal fishing and sport fishing could be adversely affected by increased vessel traffic. Thus, tax revenues generated by businesses selling goods and services to these industries would be expected to decrease.

Response T8-248

Refer to the Master Response for the Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-249

Subsequent sections of both DEISs addressing utilities tax collections, state "Because the increase in demand for utilities associated with the proposed action was determined to be minor . . . the increase in utility tax collections to the City of Hoquiam would be expected to be minor as well." This is an oversimplification; just because the increase in demand is assumed to be minor, the actual total value of utility tax collections could be large.

Response T8-249

The analysis assumes that utility tax collection would likely rise or fall proportionate to the increase in utility usage for these clients and, therefore, minor increases in utility usage would result in minor increases in tax collection.

Comment T8-250

Sections 7.3.4.1, Potential Costs Related to Increased Vehicle Traffic and Safety of both DEISs discuss the opportunity costs of time lost due to traffic delays to motorists. Yet, the total opportunity costs are not estimated. The DEISs assert that, "It is not possible to estimate how much commuting time would increase for [Hoquiam] residents because it is not possible to know what specific roads would be taken or what share Hoquiam residents would represent of the vehicles on roads affected by delays during commuting times." It is possible to estimate these figures using a detailed traffic study, which should be required by the subject DEISs given the transportation implications of the proposed WTC and ITS projects. Once these figures have been determined, estimating the value of time lost in traffic delays is possible and a straightforward calculation.

Response T8-250

Refer to the Master Response for the Economics, Social Policy, and Cost-Benefit Analyses.

Comment T8-251

Sections 7.3.4.2, Potential Costs Related to Environmental Health and Safety Concerns, in both DEIS documents fail to estimate the costs for environmental, health and safety preparedness and response by first responders or response contractors. The DEISs state that, "There is currently not enough information on the extent of training or equipment needed to quantify these costs." We contend that there are certain knowns surrounding the costs associated with training and equipment, and that the costs should be reported to Hoquiam residents as it is in part their health and safety at stake. Some estimates can reasonably be made with respect to understanding these costs, yet none are reported in either DEIS document.

Sections 7.3.4.3, Potential Impacts on Property Values, of both DEISs discuss costs associated with potential impacts of the proposed projects on Hoquiam property values. Both DEISs conclude that "Although previous hedonic pricing studies suggest that there could be impacts on property values from construction and on site operations of the proposed action, the impacts on property values that could be directly attributed to the proposed action are negligible. Because the project site is located in an already industrialized area, any negative impacts on nearby properties from construction or onsite operations would already have been realized and would not be a result of the proposed action." This is a flawed and unsubstantiated premise that suggests that the Hoquiam residential property market is static. Further, the applicants should have investigated the potential for decreased property tax revenue resulting from decreased property values.

Response T8-251

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

Comment T8-252

Appendix O, Economic Impact Analysis. As a general comment, the consultant did not thoroughly cite its sources for this report. For example, the authors did not cite the dates they received data from the applicants. The first paragraph of the Executive Summary notes that this October 2014 effort is an update of an analysis originally completed on September 5, 2013. However, the report does not cite the date(s) that WTC and ITS provided construction and operations cost information required to conduct the analysis, nor the timeliness of this information. This problem obfuscates the reliability of estimated economic impacts reported within the DEISs.

Response T8-252

Table 1 of Draft EIS Appendix O, *Economic Impact Analysis* (Appendix P in the Final EIS), indicates that construction cost information related to the proposed action was provided in September 2014 by the applicant. Table 9 indicates that operational spending and employment data were provided in September 2014. Construction and operation costs in Appendix O are presented in inflation-adjusted 2013 dollars, which provides consistent data points for the analysis regardless of when the data were received.

Comment T8-253

There is contradiction between the economic impact analysis and Sections 7.1.4.2 of both DEISs. The 'Geography' section of economic Impact analysis (page 9) states: "Many of the businesses that would supply the development of the Westway and ITS Renewables facilities are based inside the state. Thus, Washington was chosen for the construction impact analysis."

However, both DEISs contend that the majority of non-labor spending on construction will be out of state. For example, the ITS DEIS states on page 7-6, second paragraph, that "Of the $36.4 million to

go to nonlabor spending, it is estimated approximately $12.9 million (35%) would be spent on construction commodities such as materials, supplies, equipment and services in Washington. The remaining $23.5 million (65%) would be spent out of state." likewise the WTC DEIS reports (in the second paragraph of page 7-6) that 48% of nonlabor spending will be spent in Washington and the remaining 52% out of state. As we don't know the appropriate delineation of spending, this calls into question the veracity of both documents. Further, if the percentages reported in the DEIS are representative, these proposed projects are less beneficial for Washington residents and businesses.

Response T8-253

Draft EIS Chapter 7 and the Economic Impact Analysis are consistent in their description of construction spending that would occur in Washington State and outside Washington State: approximately 48% of the non-labor spending related to the proposed action would occur in Washington State.

Comment T8-254

In the 'Key Assumptions' section (page 12) the reference for conversations with railroad officials should be provided to facilitate the understanding of the timeliness of the information on railroad jobs. This information should also be cited in the second paragraph of page 24.

Also in the 'Key Assumptions' section the complete reference for the "2013 Local and Regional Economic Impact of the Port of Longview" should be provided. It is not clear in this document how the direct economic output of each vessel call was calculated, or that each vessel call would employ the full time equivalent of 0.45 workers. This information should also be presented in the first paragraph of page 24.

Response T8-254

The reference for the information on railroad jobs is:

Seil, Donald. Genesee & Wyoming, Inc. August 19, 2013—Email to Matt Steuerwalt at Strategies360 regarding PS&P job growth.

The full reference for the 2013 Local and Regional Economic Impact of the Port of Longview is:

Martin Associates. 2013. The Local and Regional Economic Impacts of the Port of Longview. Prepared for the Port of Longview. Available: http://www.portoflongview.com/Portals/0/Documents/Document-Library/Miscellaneous/_6.2013%20Port%20of%20Longview%20Economic%20Impact%20Analysis.pdf. Accessed July 7, 2016.

Comment T8-255

The first paragraph of page 15 states, "Wages, salaries, and benefits earned by all those on the construction projects will total $32.9 million and, of that $31.5 million would go to workers residing in Washington." However, Table 2 reflects that wages, salaries and benefits earned by all those working on the construction projects will total $30.4 million and, of that $29.0 million would go to workers residing in Washington. As the correct estimates are unknown, discussion and consideration of this information is fraught with uncertainty.

There is also a conflict between the data presented in Table 2 and the description in the second paragraph on page 15. Table 2 reflects that WTC will spend $37.2 million on Washington State labor and materials, while the first sentence of the second paragraph states, "Westway will invest . . . $39.7 million ($16.1 million in labor and $21.1 million in materials) of that would be spent on Washington state labor and suppliers."

Response T8-255

The text in the first paragraph of page 15 should be consistent with Table 2 and should read, "Wages, salaries, and benefits earned by all those on the construction projects will total $30.4 million and, of that $29.0 million would go to workers residing in Washington." The text in the second paragraph of page 15 should be $37.2 million, consistent with the sum of the $16.1 million and $21.1 million provided in the parenthetical and Table 2.

Comment T8-256

The second sentence of the last paragraph of page 16 should reflect that the direct outputs of construction and labor are shown on both Tables 3 (WTC) and 4 (ITS), not just on Table 3.

Response T8-256

Comment acknowledged.

Comment T8-257

Table 3 indicates 480 total jobs due to full-build out of the WTC project, whereas the second sentence of the second paragraph of page 17 reflects that labor income reported in Table 3 "would be earned by the FYE of 480 workers."

Response T8-257

As discussed on page 8, jobs are measured in full-year equivalents (FYE). The 483 total jobs presented in Table 3 are 483 FYE jobs, consistent with the text on page 17.

Comment T8-258

The second sentence of the paragraph on page 19 states: "$26.1 million of the $63.9 million in materials, equipment, other purchased goods, and services would be from Washington businesses and governments." However, Table 6 indicates that the costs of these goods and services are anticipated to be $63.6 million.

Response T8-258

The text in the second sentence should indicate a total of $63.6 million, consistent with Table 6.

Comment T8-259

References for the Washington combined trended investment tables and the 2013 Grays Harbor County tax rates should be presented on page 31.

The title of Table 16 states that the values are reported in millions of 2013 dollars; however, the values presented in Table 16 must be actual values.

Response T8-259

The Economic Impact Analysis was prepared by ECONorthwest on behalf of the Applicants and is not being updated as part of the Final EIS. These clarifications would not change the conclusions of the analysis.

Comment T8-260

CLIMATE CHANGE

11. The discussion of climate change is of limited usefulness. DOE's guidance on climate change analysis in State Environmental Policy Act (SEPA) documents includes the following statement: "For projects with ongoing operations that include transporting products from outside the state, such as a port, a more thorough and perhaps more defensible analysis would include the transportation emissions from the source location outside of Washington to the final destination if either is known and the extent to which either is known." *[Footnote: DOE. 2011. Guidance for Ecology Including Greenhouse Gas Emissions in SEPA Reviews. Available at http://www.ecy.wa.gov/climatechange/docs/sepa/20110603_SEPA_GHGinternalguidance.pdf.]* The DEISs include a limited discussion of the proposed projects' impact on climate change that certainly does not meet the above criteria for a defensible analysis. Therefore, by DOE's own guidance, the climate change discussion is not defensible because it does not include analysis of total greenhouse gas emissions from crude oil sources to receiving ports and refineries.

    The DEISs discuss only limited, localized climate change impacts. The DEISs state "The largest contribution of GHG emissions would result from rail transport and represents an increase of approximately 7.8% in the statewide rail emissions of GHGs. Overall GHG emissions related to operation of the proposed action represent about a 0.11% increase in statewide GHG emissions" (WTC and ITS pg. 6-10). The conclusion that a 0.11% statewide increase in GHG emissions is insignificant is not supported by evidence- the state is currently trying to cut GHG emissions so any the proposed projects hurt state mandates for GHG reductions. Also, DEIS summaries state the following: "Greenhouse gas emissions from the cumulative projects contribute to climate change at the global/eve/" (ITS and WTC pg. S-27). This is a quote from the DEIS, but no significant impacts are discussed in Chapter 6, Cumulative Impacts.

Response T8-260

Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, reflect emission estimates for offsite transport oil crude oil from its likely source to its furthest likely destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for more information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

The greenhouse gas emissions referenced by the commenter are related to the cumulative projects, not the proposed action alone. Net greenhouse gas emissions related to proposed action estimated in Final EIS Chapter 3, Section 3.2, Air, represent approximately 0.036% of 2011 statewide greenhouse gas emissions. Refer to the Master Response for Mitigation Framework for more information about how applicant mitigation measures are identified in the EIS.

The Final EIS *Summary* has been revised to be consistent with the text in Chapter 6, *Cumulative Impacts*, in stating that greenhouse gas emissions from the cumulative projects would contribute to global greenhouse gas emissions, which contribute to climate change.

Comment T8-261

ENVIRONMENTAL JUSTICE

12. Delineation of the affected area does not include mention of any Indian tribes present in the area affected by the proposed projects. Environmental justice is defined by the United States Environmental Protection Agency as "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies." *[Footnote: U.S. Environmental Protection Agency. 2015. Environmental Justice. What is Environmental Justice. Available at http://www.epa.gov/environmentaljustice/.]*

    SEPA does not require in an Environmental Impact Statement an assessment of environmental justice effects of a proposed action. However, Section 7.2, Social Policy, of the WTC and ITS DEISs were included per City of Hoquiam Municipal Code requirements. *[Footnote: Ibid. P. 9.]*

    The National Environmental Policy Act (NEPA) does require an analysis of environmental justice impacts for actions by Federal agencies. To guide our evaluation of the methodological soundness and appropriateness of the analyses in Sections 7.2, we consulted two sources: Executive Order (EO) 12898 and the Environmental Justice. Guidance Under the National Environmental Policy Act composed by the Council on Environmental Quality (CEQ. 1997). [*Footnote: Council on Environmental Quality (CEQ). 1997. Environmental Justice: Guidance Under the National Environmental Policy Act. Available at http://www3.epa.gov/environmentaljustice/resources/policy/ej_guidance_nepa_ce1297.pdf*.]

    EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was issued by President Clinton on February 11, 1994. This Order "directs federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law." [*Footnote: U.S. Environmental Protection Agency. 1994. Summary of Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. Available at http://www2.epa.gov/laws-regulations/summary-executive-order-12898-federal-actions-address-environmental-justice*.]

    Section 3-302 of EO 12898 directs Federal agencies to "collect, maintain, and analyze information assessing and comparing environmental and human health risks borne by populations identified by race, national origin, or income. To the extent practical and appropriate, Federal agencies shall use this information to determine whether their programs, policies, and activities have disproportionately high and adverse human health or environmental effects on minority populations and low-income populations." [*Footnote: Clinton, William J. 1994. Executive Order 12898. 59 Federal Register 7629. Available at http://www.archives.gov/federal-register/executive-orders/pdf/12898.pdf* .]

CEQ (1997) states that in the memorandum accompanying transmission of EO 12898, President Clinton directed Federal agencies to "analyze the environmental effects, including human health, economic and social effects, of Federal actions, including effects on minority communities and low-income communities, when such analysis is required by [NEPA]". [*Footnote: Ibid. fn. 24.*] It furthers states that "Environmental justice concerns may arise from impacts on the natural and physical environment, such as human health or ecological impacts on minority populations, low-income populations, and Indian tribes, or from related social or economic impacts." [*Footnote: Ibid. P. 8.*]

CEQ (1997) sets forth that:

"the question of whether agency action raises environmental justice Issues Is highly sensitive to the history or circumstances of a particular community or population, the particular type of environmental or human health impact, and the nature of the proposed action itself. There is not a standard formula for how environmental justice issues should be identified or addressed. However, the following six principles provide general guidance.

Agencies should consider the composition of the affected area, to determine whether minority populations, low-income populations, or Indian tribes are present in the area affected by the proposed action, and if so whether there may be disproportionately high and adverse human health or environmental effects on minority populations, low-income populations, or Indian tribes." [Footnote: Ibid. Pp. 8.]

In Sections 7.2 ICF evaluated four elements of community and social structure that could be beneficially or adversely affected by the proposed projects: community cohesion, community welfare, population growth, and minority and low-income communities. Existing conditions relative to these elements were first described, followed by likely impacts to these elements resulting from the no-action alternative or from construction or routine operations of the proposed actions. We find this to be a reasonable approach to elucidating potential beneficial or adverse effects of the proposed actions. [Footnote: There is no brightline of what constitutes a disproportionately high and adverse human health or environmental effect. However, it is known that some of the adverse effects of transportation projects include disruption in community cohesion, safety issues, greater exposures to hazardous materials, increased levels of noise and vibration, and increased water and air pollution. ICF captured the breadth of potential adverse effects in the four elements it assessed.]

In Section 7.2.11CF defined the study area for social policy as "the communities surrounding the project site that could be affected by construction and routine operation of the proposed action," and the "communities that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P) rail line and vessel transport through Grays Harbor."

We contend that this an inappropriate delineation of the composition of the affected area, as it does not include mention of any Indian tribes present in the area affected by the proposed projects. For example, the U&A Fishing Area of the QIN includes Grays Harbor. QIN members working in Grays Harbor will potentially be adversely affected by the proposed projects. [Footnote: This concept is investigated in detail in the discussion insufficiencies on page 6.] The Chehalis Tribe also has a recreational shell fishing area present in the affected area.

We find the information sources used in this impact analysis to be sound and appropriate. ICF

explains in Sections 7.2.2.2 that "Impacts of the proposed action on social policy elements were evaluated qualitatively." We find qualitative evaluation to be a reasonable approach for this impact analysis due to the lack of specific guidance or an industry standard.

ICF defines a population as a minority or low-income population ". . . if the percentage of minority or low-income individuals in any given census block group was greater than the percentage of that population at the county level." Again, we consider this a reasonable approach due to the lack of specific guidance or an industry standard.

ICF further defines minority populations to "include all racial groups other than white" and low-income populations to "include those living below poverty". These definitions are reasonable; however, the definition of what constitutes 'living below poverty' is not explained. ICF should have stated that what constitutes a low-income population is the percent of the total population living below the federal poverty line in a given year, and then defined the year of the data, as the value of the poverty line varies year-to-year. All data is taken from the same data set (i.e. United States Census Bureau, 2009-2013 American Community Survey), thus we know that the data is normalized and the problem is limited to provision of an accurate definition.

As the proposed projects are in close proximity, propose to use the same rail system, and have very similar construction and routine operation characteristics affecting the same communities, the same analytical design is appropriate for both DEISs.

We find Sections 7.2.3, What are the existing conditions related to social policy in the study area?, of both documents appropriate with respect to describing adverse effects on minority and low-income populations in the affected area. The collected for this analysis is from the 2009-2013 American Community Survey, published by the United States Census Bureau in 2014. This is the most appropriate and recent data set for use. By extension we find that the data tables presented in Appendix P, Census Block Group Data, of both DEISs, which use data collected from this source are appropriate for these populations.

However, no specific information was provided on Indian tribes present in the affected area in Section 7.2.3, and no information was provided on Indian tribes present in the affected area in Appendix P.

Regarding the potential impacts on the four elements of social policy, we find the conclusions of Sections 7.2.4.1, No-Action Alternative, to be reasonable in both DEISs.

We find the conclusions of Sections 7.2.4.2, Proposed Action, to be reasonable in both DEISs regarding potential disproportionate adverse human health or environmental effects to minority and low-income populations and Indian tribes during project construction and routine operations. No disproportionately beneficial effects on minority or low-income populations or Indian tribes were identified; we concur with this finding.

Response T8-261

Tribes with the potential to be affected by the proposed action are discussed in Draft EIS Chapter 3, Section 3.12, *Tribal Resources.* This section includes an analysis of potential impacts from construction and routine operations on tribal resources. Chapter 6, *Cumulative Impacts*, describes

potential cumulative impacts on tribal resources. Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, presents information about the potential impacts on tribal resources that could occur as the result of increased risks of incidents involving the spill of crude oil.

Comment T8-262

Mitigation

It is unclear if the proposed mitigation plan will compensate for impacts on environmental resources and/or treaty reserved rights to such resources. Section 7.2.5.1, Applicant Mitigation, of both DEISs describe the mitigating actions the project proponents intend to enact. With respect to applicant mitigation of adverse effects on treaty resources, both DEISs state only to the extent that: "The applicant will appoint a tribal liaison to assist in addressing issues of concerns to federally recognized tribes; develop cooperative solutions to tribal concerns; be available for tribal meetings; and conduct periodic outreach. The applicant will provide the name, telephone number, and email address of the tribal liaison to officials of each tribe that wish to be notified."

This is statement is not a mitigation measure or an action plan for addressing any one of the specific items identified in Sections 7.2.4.1n neither DEIS is a single mitigation measure offered to avoid potential damage to the QIN's treaty resources.

Section 3.12, Tribal Resources, offers three proposed mitigation measures in Sections 3.12. They include coordination to possibly adjust docking schedules, notification of vessel transits, and discussion of additional mitigation measures. Coordination, notification, and discussion are also not mitigation measures. Without outlining specific mitigation measures for every possible impact, it must be assumed that impacts will likely occur. Mitigation measures in other sections of the DEIS are specific and thorough. Lack of explanation of ambiguity in tribal mitigation measures makes them even more suspect.

Thus, we contend that the applicants have failed the requirement of WAC 197-11-440(6)(c)(iii), which states "clearly indicate those mitigation measures (not described in the previous section as part of the proposal or alternatives), if any, that could be implemented or might be required, as well as those, if any, that agencies or applicants are committed to implement."

Feasibility of the mitigation required to compensate for the impacts on fisheries resources is not demonstrated. As above in subsection Mitigation, Section 3.12.7.1, Applicant Mitigation, of both DEISs pronounce three proposed actions to mitigate for potential impacts on tribal fishing. Again, we contend that coordination, notification, and discussion are not mitigation measures.

Sections 3.12.8, Would the proposed action hove unavoidable and significant adverse impacts on tribal resources?, of both DEISs state, "Implementation of the mitigation measures described above would reduce but may not completely eliminate impacts on tribal resources. More specifically, vessels related to the proposed action would travel through usual and accustomed fishing areas in Grays Harbor. Under current and future conditions, increased vessel traffic could restrict access to tribal fishing areas in the navigation channel and adjacent to Terminal 1." It is acknowledged by the project proponents that these conflicts are ...most likely to occur for fishing related to harvest of salmon, steelhead, and sturgeon." Further, recognizing that "NO mitigation measures would

completely eliminate the possibility of impacts to fishing resources because of vessel operations related to the proposed action."

Neither DEIS provides specific mitigation measures required to address the compensation for potential damages on fisheries resources and specifically those impacting Treaty commercial and subsistence fishers. As previously noted in this review, mitigation measures in other sections of the DEIS documents are specific and thorough.

Thus, we again find that the applicants have failed the requirement of WAC 197-11-440(6)(c)(iii).

Response T8-262

Draft EIS Chapter 3, Section 3.12.5.2, *Proposed Action*, acknowledges that vessel activity related to routine operation of the proposed action could affect the ability of the Quinault Indian Nation to access tribal fisheries in Grays Harbor. The Draft EIS does not make a determination of significance related to tribal resources or treaty rights. Section 3.12.8, *Would the proposed action have unavoidable and significant adverse impacts on tribal resources?* states that because factors besides vessel operations affect fishing opportunities, such as the number of fishers, fish distribution, timing, and duration of fish windows, the extent to which vessel operations related to the proposed action would affect tribal fishing is difficult to quantify. Therefore, the proposed mitigation is intended to ensure a means of coordination to address tribal concerns.

Comment T8-263

ABOUT THE INDEPENDENT REVIEW

Resource Dimensions

Resource Dimensions is a multidisciplinary economic and policy consulting firm specializing in integrated analyses and the development of sustainable solutions. Drawing on extensive industry knowledge, distinguished professionals, and innovative analytics, we work with our clients to develop solutions to complex natural resource, land use, conservation, community development, transportation, and energy issues. Resource Dimensions' approach is strengthened by its diverse range of expertise and interdisciplinary team of partners and associates from the fields of economics, planning, law, land conservation, agriculture, natural resource management, geography, forestry, ecology, sociology, biology and public policy.

Serving major corporations, governments, tribes, non-profit, private, and international organizations for over three decades, Resource Dimensions has broad experience in assessing the economic and socioeconomic consequences of a wide variety of projects and policy implications, and developing creative community-based solutions. Our analyses are informed by an understanding of the local, regional and national economy as well as attitudes, beliefs and values-the human/social dimensions. Thinking innovatively as we work to solve a range of complex issues, we lead the field in the use and expansion of methodologies to assess economic and social impacts at the state, regional and local levels. Since 1985, we have completed over 800 projects across the United States and seven other countries.

The independent review was led by Resource Dimensions principal, Dr. Julie Ann Gustanski, LLM, AICP. She holds a PhD in Economics, an MS in Regional Planning and LLM in Planning Law from the

University of Edinburgh (UK), an MEM in Economics, Natural Resource Management and Public Policy from Duke University, and a BS in Legal Studies and Environmental Policy from the University of Minnesota. Dr. Gustanski has more than 30 years of experience in natural resource and applied economic analyses, regional economic modeling, policy and regulatory analysis, and social and economic impact analysis as it relates to a variety of water, land use and natural resource management issues. She has conducted over 300 social and economic impact studies and has been involved with over 50 EA/EIS and other compliance studies for various state and federal agencies.

Supporting Resource Dimensions team members include David A. Scarsella, MS and Anna Scofield, MS, who were selected for their expertise and familiarity with the range of issues involved.

Response T8-263

Comment acknowledged.

Comment T8-264

EXHIBIT4

Technical Review of Draft Environmental Impact Statements for the Proposed Westway and Imperium Terminal Services Expansion Projects

Prepared for: Knoll Lowney, Esq.
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Prepared by: Joseph Wartman, Ph.D.
2017 23rd Avenue, East
Seattle, Washington, 98112

Date: 15 November 2015

Introduction

At your request, I conducted a technical review of Draft Environmental Impact Statements (DEISs) for the proposed Westway and Imperium Terminal Services expansion projects located at the Port of Grays Harbor in Grays Harbor County, Washington. By way of introduction, I am an Associate Professor of Civil and Environmental Engineering at the University of Washington, where I teach and conduct research on geologic hazards. *[Footnote: Appendix I provides a more detailed professional biography and an abbreviated curriculum vitae for Dr. Joseph Wartman.]* I first reviewed the terminal expansion projects in 2013 and prepared an expert report on geologic hazards and risk mitigation for the facilities. *[Footnote: A copy of Dr. Joseph Wartman's 2013 expert report is included as Appendix II.]* The terminal expansion projects involve construction and operation of industrial facilities to contain and transport heavy crude oil, which will be shipped to the port using Puget Sound & Pacific Railroad (PS&P) train lines, stored on-site in large tanks, and then transferred to ships. Additional details about the Westway and Imperium terminals are contained in their respective DEISs.

My technical review focused mainly on two sections of the DEISs: (1) Chapter 3, which addresses affected environment, impact, and mitigation, and (2) Appendix C, which describes tsunami impact modeling and analysis. Although the Westway and Imperium terminals are independent projects,

they are similar facilities located in close proximity to each other. The major technical aspects of Chapter 3 and Appendix C for each respective DEIS are virtually identical, and therefore my review comments below address both projects.

Seismic Hazards

The Affected Environment, Impact, and Mitigation section of the DEISs (Chapter 3) largely focuses on earthquake potential and associated secondary seismic effects including strong ground shaking, soil liquefaction, coseismal tectonic subsidence, and tsunamis. The emphasis on earthquake hazards is appropriate since the project sites (and associated PS&P rail line) are located in a high seismicity region with the strong likelihood of a large earthquake (i.e., Magnitude 6 or greater) during operation of the facility. The DEISs note that over a 50-year period (i.e., the typical design life of an engineered facility), there is a 2% chance that an earthquake will cause ground shaking at the site in excess of peak ground acceleration (PGA) = 0.7g; this is expected to result in moderate to heavy structural damage to the facility. This statement reflects information most recently provided by the U.S. Geological Survey; the current scientific knowledge about seismicity in the region continues to develop rapidly. However, not discussed in the DEISs is the more likely case of only moderate shaking (PGA = 0.3 g or greater), which can likewise cause significant structural damage to port facilities (there is about a 10% chance of PGA exceeding 0.3g during a 50-year design life of the facility). *[Footnote: USGS Seismic Hazard Curve Application, http://geohazards.usgs.gov/hazardtool/application.php.]* For example, during the 1995 Great Hanshin, Japan earthquake, local ground shaking of PGA = 0.31g caused major damage to the port of Kobe, a modem industrial harbor facility. Included among the many effects at the port of this earthquake were damage to quay walls, breakwaters, pile-supported structures, and industrial equipment such as large cranes. *[Footnote: Werner, S. and Dickenson, S. (1996) Hyogo-Ken Nanbu Earthquake of January 17, 1995: A Post-Earthquake Reconnaissance of Port Facilities, ASCE Press.]*

Response T8-264

Draft EIS Chapter 3, Section 3.1, *Earth*, considers the impacts related to a large earthquake. Smaller events are considered by inclusion in the consideration of the larger and more intense seismic event. Refer to the Master Response for Earthquake Probabilities for an explanation of the basis for the earthquake probability assumptions in the Draft EIS.

Comment T8-265

Owing to the high seismicity of the region and geologic conditions at the sites, the terminal projects are subject to soil liquefaction, a secondary earthquake-related hazard that is common in coastal settings. Soil liquefaction can cause granular soils (such as those that underlie the project sites) to soften and loose strength in an earthquake. The Washington State Department of Natural Resources has designated the Port of Grays Harbor and the surrounding area as a zone of high liquefaction hazard. *[Footnote: Earthquake-induced landslide and liquefaction susceptibility and initiation potential maps for tsunami inundation zones in Aberdeen, Hoquiam, and Cosmopolis, Grays Harbor County, Washington, for a M9+ Cascadia subduction zone event, (2013) by S. L. Slaughter et al. Wash. State Dept. of Nat. Res. Invest. 36.]* The consequences of soil liquefaction at port faculties has been well documented during many earthquakes over the past several decades during events in the United States, Japan, Peru, Chile, and Mexico, among other countries. These consequences have resulted in significant damage to buildings, tanks, retaining structures, and utilities. *[Footnote:*

Werner et al. (1998) Experiences form Past Earthquakes (Chapter 2), in Seismic Guidelines for Ports, ASCE Press.]

Response T8-265

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how seismic-related risks such as liquefaction at the project site would be addressed.

Comment T8-266

Due to their setting in the Pacific Northwest, the terminal sites are also susceptible to coseismal subsidence and tsunamis, which are coseismal hazards unique to subduction earthquakes. Coseismal subsidence is a regional-scale tectonic phenomenon whereby the ground surface subsides, or reduces in elevation, which makes land in the region area more susceptible to tsunamis and flooding. Tsunamis pose what is perhaps the most significant subduction earthquake-related threat to the sites. Moreover, they could strike with only 20 minutes notice, leaving little time for shutdown of an industrial facility. The Washington State Department of Natural Resources has designated Port of Grays Harbor as a tsunami inundation zone *[Footnote: Walsh et al. (2000) Tsunami hazard map of the southern Washington coast—Modeled tsunami inundation from a Cascadia subduction zone earthquake: Washington Division of Geology and Earth Resources Geologic Map GM-49]* and site-specific modeling and analysis conducted for the DEISs (Appendix C) further supports this zonation. Tsunami damage to storage tanks at ports has been observed after at least several earthquakes over the past decades and is well described in a recent report on damage to storage tanks during the 2011 Tohoku, Japan Earthquake. *[Footnote: Hatayamaa (2015) Damage to Oil Storage Tanks from the 2011 Mw 9.0 Tohoku-Oki Tsunami, Earthquake Spectra.]* This report describes several modes of tsunami induced tank failure including damage to tank bodies, plumbing and mechanical equipment, containment structures, and foundations. The report also notes that of the 418 tanks located in the Tohoku tsunami inundation zone, 157 were moved and destroyed by the wave forces.

Response T8-266

The tsunami risk analysis in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis,* describes assumptions regarding tide levels, coseismic subsidence, and sea level rise that may occur following a Cascadia Subduction Zone L1 9.0 Mw earthquake and subsequent tsunami. Refer to the Master Response for Seismic Risk and Design Requirements for a description of the earthquake source model and hydrodynamic modeling method used in the site-specific tsunami analysis conducted for the project site and presented in Appendix C.

Comment T8-267

Landslide Hazards

The DEISs describe landslide hazards associated with the project, which mainly pertain the PS&P rail lines. However, the description in the DEISs is limited to precipitation-induced landslides that occur only under non-seismic conditions. The DEISs do not recognize that even moderate magnitude earthquakes (i.e., Magnitude 5 and above) are capable of simultaneously triggering many coseismic landslides across wide region. *[Footnote: Keefer (1984) Landslides caused by earthquakes, Bull. of the Geol. Soc. of America.]* In many past earthquakes, coseismic landslides have been observed to disproportionally affect transportation corridors, such as the PS&P rail line, which typically include

over steepened, artificial cuts. The consequences of coseismic landsliding will vary based on the size and travel velocity of landslide debris, among other factors, but could reasonably be expected to include derailment of rail cars *[Footnote: The 2013 derailment of an Amtrak train near Everett serves as a recent local example of landslide-caused train event]* used to transport oil to the terminal sites.

Response T8-267

Draft EIS Chapter 3, Section 3.1.4.3, *Geologic Hazards, Landslides and Slope Instability*, acknowledges earthquake-triggered landslides and states that earthquake-induced landslides also occur primarily during saturated conditions.

Comment T8-268

Mitigation

The DEISs highlight proposed mitigation actions that will attempt to address some of the liquefaction hazards at the projects. These include use of pile foundations for tanks and removal of "soft, loose" (and thus highly liquefiable) soil that may be assumed to extend to relatively deep depths at the site. While pile lengths are specified, more specific details of the planned soil removal (e.g. depth, spatial extent) are not presented and this precludes any assessment of the potential effectiveness of these mitigation actions at this time. Additionally, it appears that pile foundations will only be used for foundation support of storage tanks, leaving other critical infrastructure (e.g., above- and below-ground piping, mechanical equipment, etc.) and facility safety elements (e.g., secondary spill containment berms) vulnerable to damage from soil liquefaction.

To help mitigate the tsunami hazard, the DEISs state that earthen protection berms will be constructed around the facility to counter tectonic and liquefaction-induced subsidence, and to impede incoming tsunami waves. However, project-specific analysis of this mitigation action (Appendix C) indicates that tsunami waves may still be expected to overtop the protection berm, allowing the facility to be impacted by waves. As noted above, events such as the Tohoku Earthquake have shown that tsunamis in many cases can induce significant damage to storage tanks and associated industrial equipment, resulting in release of hazard materials and fires following an earthquake. *[Footnote: For example, see summary of case studies presented in: Hatayamaa (2015) Damage to Oil Storage Tanks from the 2011 Mw 9.0 Tohoku-Oki Tsunami, Earthquake Spectra.]*

Response T8-268

The proposed facility would have spill containment that surrounds the area of the storage tanks. This spill containment is not considered a berm for tsunami waves. The natural topography of the site is slightly higher near the shoreline. However, this higher ground is not a constructed berm. An earthen berm is mentioned as a potential improvement to reduce the risk of tsunami at the project site in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis.* However, the adjacent parcels and community do not intend to raise the entire length of shoreline to create a contiguous line of high elevation to reduce the potential of overtopping by tsunami. As standalone mitigation at the project site, this is not a practicable measure.

Refer to the Master Response for Seismic Risk and Design Requirements for information on how existing regulations and applicant mitigation would reduce liquefaction and tsunami risks at the project site.

Comment T8-269

Summary

I concur with the Draft Environmental Impact Statements findings that seismic hazards (and their associated secondary effects) pose threats to the proposed Westway and Imperium Terminal Services expansion projects. While I also agree that potentially high levels of ground shaking (PGA of 0.7g or greater) may result in heavy damage to the facility, I believe that the more likely case of even lower intensity earthquake motions (PGA = 0.3g or greater) may cause significant damage. In addition to strong ground shaking, secondary earthquake hazards such as soil liquefaction, subsidence, and tsunamis pose significant threats to the facility that may result in release of hazardous materials, among other adverse consequences. Seismic mitigation actions have been proposed for the facility; however, their full details are not disclosed in the DEISs. Nevertheless, no mitigation measures are capable of fully mitigating the geologic hazards and associated risks posed to the facilities.

Response T8-269

Draft EIS Chapter 3, Section 3.1.8, *Would the proposed action have significant and unavoidable adverse impacts on earth resources and conditions?* discusses potential unavoidable and significant adverse environmental impacts at or near the project site were a tsunami to occur and the facility was not constructed to withstand it. Refer to the Master Response for Seismic Risk and Design Requirements.

T9, Shoalwater Bay Indian Tribe, Douglas Davis

Comment T9-1

November 18, 2015

SHOALWATER BAY INDIAN TRIBE P.O. Box 130 · Tokeland, Washington 98590-0130 Telephone (360) 267-6766 · Fax (360) 267-6778

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

Thank you for the opportunity to comment on the EISs for the Westway and lmperium Expansion Projects. After reviewing the two documents it appears that permitting these projects presents problems that neither the proponents nor the State of Washington is currently able to address. The three major problems relate to inadequate regulations, preparedness and geographical scope of environmental impacts.

These projects would facilitate an increase in crude oil transport within the state of Washington and along its coast resulting in an increased frequency in potential spills. From a regulatory standpoint, the State of Washington is not prepared to deal with an increase in crude oil transport. “The Chapter 173-180 WAC has not been updated for facility spill prevention standards since 1994” (*Washington State Marine & Oil Transportation Study Preliminary Findings & Recommendations,* October 1, 2014). This regulation was developed before crude by rail was a common practice. “The current regulatory response planning for Grays Harbor will require enhancements in the event that all three proposed

crude by rail facilities - Imperium, Westway, and Grays Harbor Terminal LLC - be permitted. Current response equipment would likely be insufficient for spills from the facilities and/or the associated tank vessel traffic" (Washington State Marine & Oil Transportation Study Preliminary Findings & Recommendations, October 1, 2014). The State has never established a level of financial responsibility for facilities handling crude oil. Who will take on the financial responsibility if it is not required of the oil handlers?

Response T9-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment T9-2

Regarding environmental impacts, geographic scope of these EISs is restricted to Grays Harbor. This indicates that there is an assumption that if a spill occurs it will happen only in Grays Harbor and will be successfully contained there as well. First responders likely lack the equipment and training to sufficiently respond the increased likelihood of a spill. Furthermore, GRPs in some areas, such as Pacific County, have not been updated in years. There is no established vessel traffic system within Grays Harbor and prevention measures such as the requirement of escort tugs in Grays Harbor are lacking practice (*Washington State Marine & Oil Transportation Study Preliminary Findings & Recommendations*, October 1, 2014).

Response T9-2

Draft EIS Appendix N, *Oil Spill Modeling*, acknowledges the limitations of the model to depict the movement of oil outside Grays Harbor. The appendix and Chapter 4, *Environmental Health and Safety*, state that depending on the circumstance of an incident, it is possible for oil to move outside the harbor and up or down the coast. Attachment A in Appendix M provides information about two historical vessel incidents, including the Nestucca spill referenced in the comment. For more information about the limitations of the model, refer to the Master Response for Oil Spill Modeling Methods.

The analysis of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, considers the effectiveness of existing regulations and identifies additional mitigation measures to reduce

risks during vessel transport. Final EIS Chapter 5, *Extended Rail and Vessel Transport*, reflects additional information characterizing potential risks related to vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action and acknowledges the need for updated and consistent geographic response planning. Chapters 4 and 5 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5 addresses potential impacts from rail and vessel transport in the extended study area qualitatively.

Comment T9-3

The Shoalwater Bay Tribe gives top priority to the protection of its natural resources. Only when the State of Washington can adequately regulate the transport of crude oil within the State and along its coastline and that crude oil handlers can demonstrate sufficient preparedness and willingness to respond and accept financial responsibility for worst case spill scenarios will the Shoalwater Bay Tribe not oppose such projects as the Westway and Imperium expansions.

Sincerely,

Response T9-3

Comment acknowledged.

Chapter 5
Organizations

The organizations listed in Table 5-1 submitted comments on the Draft EIS. These comments and responses to those comments are presented after the table. Master responses were developed to address commonly raised comments and are presented in Chapter 2, *Comment Themes and Master Responses*.

The responses refer to the Draft EIS unless information has been revised, in which case the Final EIS is specified.

Table 5-1. Comment Letters Submitted by Organizations

Number	Organization
O-1	Amazing Grace Church, Val Metropoulous
O-2	Audubon Washington, Trina Bayard
O-3	Black Hills Audubon Society, Sam Merrill
O-4	Columbia Riverkeeper, Dan Serres
O-5	Columbia Riverkeeper, Dan Serres
O-6	Earth Ministry, Jessie Dye
O-7	Earth Ministry, Jessie Dye
O-8	Earth Ministry, Jessica Zimmerle
O-9	Eastside Audubon Society, Peter Marshall
O-10	Eastside Audubon Society, Jan McGruder
O-11	Extreme Oil Campaign Director, Matt Krough
O-12	Friends of Grays Harbor, Arthur Grunbaum
O-13	Friends of Grays Harbor, Arthur Grunbaum
O-14	Friends of Grays Harbor, Arthur Grunbaum
O-15	Friends of Grays Harbor, Arthur Grunbaum
O-16	Friends of the Columbia Gorge, Ryan Rittenhouse
O-17	Friends of the San Juans, Stephanie Buffum
O-18	Friends of the San Juans, Stephanie Buffum
O-19	Grays Harbor American Bird Conservancy, Steve Holmer
O-20	Grays Harbor Audubon Society, Arnie Martin
O-21	Grays Harbor Audubon Society, Arnold Martin
O-22	International Union of Operating Engineers, Local 302, Josh Swanson
O-23	International Union of Operating Engineers, Local 302, Josh Swanson
O-24	Lake Pond Oreille Waterkeepers, Shannon Williamson
O-25	League of Women Voters, Peggy Benton
O-26	League of Women Voters , Mary Moore
O-27	League of Women Voters of Bellingham Whatcom County, Jayne Feudenberger
O-28	League of Women Voters of Thurston County, Patricia Dickason
O-29	Multiple Organizations
O-30	Nisqually Aquatic Reserve Citizen Stewardship Committee, Daniel A. Hull

O-31	Northwest Steelheaders Association, Michael O'Leary
O-32	Olympic Forest Coalition, Connie Gallant
O-33	Oregon Interfaith Power and Light, Jenny Holmes
O-34	Oregon Physicians for Social Responsibility, Regna Merrit
O-35	Oregon Physicians for Social Responsibility, Regna Merrit
O-36	Oregon Physicians for Social Responsibility, Regna Merrit
O-37	Oregon Physicians for Social Responsibility, Regna Merrit
O-38	Pacific Coast Shellfish Growers Association, Becky Mabardy
O-39	Pederson Brothers Inc., Joe Wilson
O-40	Polly Dyer Cascadia Broadband, Shelley Spalding
O-41	Puget Sound & Pacific Railroad, Kenneth Charron
O-42	Raging Grannies Activist Women
O-43	Rural Energy Group, Scott Hedrick
O-44	Safe Energy Leadership Alliance, Dow Constantine
O-45	San Juan Islanders for Safe Shipping, Shaun Hubbard
O-46	Sierra Club Upper Columbia River Group, W. Thomas Soeldner
O-47	Spokane Riverkeeper, Jerry White Jr.
O-48	Spokane Riverkeeper, Jerry White Jr.
O-49	Spokane Riverkeeper, Jerry White Jr.
O-50	Surfrider Foundation, Gus Gates
O-51	Surfrider Foundation, Gus Gates
O-52	Tahoma Audubon Society, Brice Hoeft
O-53	The Lands Council, Laura Ackerman
O-54	Trails Club of Oregon, P. Sydney Herbert
O-55	Twin Harbors Fish and Wildlife Advocacy
O-56	U.S. Shorebird Conservation Partnership, Brian W. Smith
O-57	Washington Dungeness Crab Association, Westport Charter Association, & Coastal Coalition of Fishers, Larry Thevik
O-58	Washington Dungeness Crab Fish Association, Larry Thevik
O-59	Washington Dungeness Crab Fishermen's Association WDCFA and Coastal Coalition of Fisheries CCF, Larry Thevik
O-60	Washington Environmental Council, Rebecca Ponzio
O-61	Washington Physicians for Social Responsibility, Bruce Amundson
O-62	Washington Physicians for Social Responsibility, Bruce Amundson
O-63	Washington Physicians for Social Responsibility, Laura Skelton
O-64	Washington Physicians for Social Responsibility, Laura Skelton
O-65	Washington Physicians for Social Responsibility, Laura Skelton
O-66	Washington State Office of the National Audubon Society, Friends of Birds, Jen Syrowitz
O-67	Westway Terminal Company LLC
O-68	Westway Terminal, Steve Williams
O-69	Willamette Women Democrats, Heidi Fox
O-70	Willapa Grays Harbor Oyster Growers Association, Ken Weigardt
O-71	Willapa Hills Audubon Society, Charlotte Persons

O1, Amazing Grace Church, Val Metropoulous

Comment O1-1

My name is Val Metropoulos, Pastor of the Amazing Grace Church here in Aberdeen representing the Evangelical Lutheran Church America. If you go to the elca.org Website, there's a document called the -- a Social Statement called the Caring of Creation. It does a good job at explaining how Christianity looks at our responsibility and our care for creation as people of faith.

But I also believe, in my study, that all people of all world religions are called on to care for the earth and care for those who are most vulnerable in our world. So we speak for those who can't speak for themselves, including the earth and the environment.

I personally think the earth is speaking quite loudly now in places in the world through hurricanes, and floods, and many other forms. But we need to interpret that and we can interpret that with our religious documents.

And we have been called to speak, which is that the word that God calls us as stewards of the earth and all of its resources' steward and not dominate or have dominion, an old translation, which has encouraged people for many generations to look at our call to use it until it's used up and throw it away because it's not our home.

Well, that is not what we believe and that is not our call. So we speak for the earth, and we speak for people who are the poorest and most vulnerable who tend to live along railroads. They live in the poorest areas of town where they are vulnerable to accidents and explosions.

They most likely would need a job that would put them in harm's way. And, so, we speak for them as well that they be considered and that only the safest environment be -- for them.

Thank you.

Response O1-1

Comment acknowledged.

O2, Audubon Washington, Trina Bayard

Comment O2-1

Audubon Washington

November 18, 2015

Westway and Imperium Projects EISs
c/o ICF International
Attn: D. Butorac, B. Shay
710 Second Avenue, Suite 550
Seattle, Washington 98104

Dear Ms. Butorac and Mr. Shay,

Thank you for the opportunity to comment on the draft Environmental Impact Statements (EISs) for two terminal expansion projects at Terminal 1 at the Port of Grays Harbor in Grays Harbor County, Washington. The Westway Terminal Company LLC (Westway) and Imperium Terminal Services (Imperium) projects involve the expansion of existing industrial facilities to store and handle crude oil. In addition to the impacts anticipated during construction, ongoing impacts due to additional storage tanks, rail expansions, and increased frequency of oil transport by rail and vessel are expected.

Audubon has a long history with the protection of critical habitat in Grays Harbor. Our chapters in Thurston County (Black Hills Audubon Society) and Pierce County (Tahoma Audubon Society) were directly involved in the creation of the Grays Harbor Wildlife Refuge back in the 1980s. Other chapters from around the state, including Seattle Audubon Society, supported the establishment of a wildlife refuge in Grays Harbor. In fact, our Grays Harbor chapter was started, with help from renowned environmental activist Hazel Wolf, to protect the hundreds of thousands of shorebirds that stop each year on their way to and from nesting and breeding grounds in Alaska.

Audubon Washington is an organization dedicated to the protection of birds and their habitats. We have 25 active chapters here in Washington, representing over 21,000 members. We also have three science and nature centers located in Seattle, Sequim and Tacoma that serve over 35,000 people each year.

Grays Harbor is widely recognized as an estuary of vital ecological significance in Washington State and in the Pacific Flyway at large. As the fourth largest estuary on the West Coast, Grays Harbor supports a diverse array of birds and marine wildlife, including extraordinary numbers of migratory shorebirds and other marine birds; a vibrant fishing, crab, and shellfish industry; and a tourism and recreation industry reliant on a clean harbor and a bountiful ecosystem. As such, Grays Harbor and other nearby coastal areas play a fundamental role in supporting both ecological and human well-being in the region. A recent assessment of natural capital in Grays Harbor County placed the value of the County's nearshore ecosystems somewhere between $313 million and $3.1 billion dollars per year. [Footnote i: Flores, L., Schundler, G. 2014. Valuing Nearshore Ecosystems in Grays Harbor County: A Natural Capital Assessment to inform the Shoreline Master Program planning process. Earth Economics, Tacoma, WA.]

The EISs evaluated the risk of small, medium, and large spill scenarios at the terminals, along the rail line and from vessels in terms of the likelihood of occurrence, likelihood of reaching water, and potential environmental impacts. Under this assessment, a number of spill scenarios were identified in which the likelihood of a spill occurrence is moderately likely to likely, and the potential environmental impact is moderate to severe. We have concluded that the likelihood of a spill is high, and that the environmental risks posed by the project may result in unavoidable and significant impacts to environmental resources in Grays Harbor and the Chehalis River floodplain, including ESA listed species. For this, and other reasons described below, we are in opposition to both the Imperium and Westway expansion projects.

As an organization dedicated to birds, our comments are focused on concerns about impacts to birds or resources important to birds within Grays Harbor, including habitat and food resources. Given the significance of Grays Harbor as stopover habitat for migratory shorebirds and waterfowl within the Pacific Flyway, we are dismayed that the EISs have failed to adequately assess the potential impacts of the proposed projects on resident and migratory bird populations. As a result, insufficient

information is available to analyze the potential environmental impacts, appropriate mitigation measures have not been explored, and alternatives have not been assessed.

Response O2-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on the Grays Harbor estuary and Pacific Flyway.

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been updated to clarify the potential impacts on shorebirds consistent with the approach to the analysis of risks discussed in the Master Response for Environmental Health and Safety Analysis.

Comment O2-2

EIS content and accuracy

Section 3.5.3.1 Information Sources

It appears as though the SEPA co-leads on the EISs have put forth a minimum level of effort when it comes to identifying animals and important habitat areas in the study area. Information queries were limited to establishing the occurrence of state and federal species of conservation concern and the location of state and federal protected areas. Inquiries included the Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species Database; the U.S. Fish and Wildlife Service (USFWS) Information, Planning, and Conservation online planning tool; and the National Oceanic and Atmospheric Administration (NOAA) Fisheries website. The Washington Natural Heritage Program (WNHP) was consulted regarding the location of rare plant species, high-quality native plant communities, and Washington Natural Area Preserves.

The EISs failed to consider information sources from the scientific literature, online data repositories such as eBird, traditional ecological knowledge, and no baselines studies were conducted. The EISs also failed to note that in addition to its status as a site of hemispheric importance for shorebirds (www.WHSRN.org), Grays Harbor Estuary also supports six state-level Important Bird Areas (IBAs) (see attached figure [Figure of Washington's Coastal Estuary Important Bird Areas; reviewed but not reproduced.]). Important Bird Areas are sites that provide essential habitat for one or more species of birds; sites are ranked as Global, Continental, or State level IBAs, depending on their significance. Grays Harbor also is considered one of the top destinations nationwide to view birds.

In their May 27, 2014, Scoping Comments, WDFW recommended "A series of status determinations for key fish and wildlife populations in the Grays Harbor and nearshore Pacific Ocean waters to establish a baseline prior to the expansion of these facilities. [Footnote ii: May 20, 2014. Imperium and Westway Environmental Impact Statement Scoping Comments. Michelle Culver, Regional

Director, Washington Department of Fish and Wildlife, Montesano, WA.] The key populations would include forage fish, such as anchovy, herring, and smelt; nearshore and juvenile rockfish; nearshore flatfish; seabirds and shorebirds." By choosing not to complete these status determinations, you have provided no means for evaluating the potential impacts to these populations should the project be approved.

Response O2-2

In accordance with the SEPA Rules (WAC 197-11-440(6)(c)(i)), Draft EIS Chapter 3, Section 3.5, *Animals*, focuses on rare, threatened, or endangered species (listed in Draft EIS Appendix F, *Special-Status Species*) and conservatively assumes that these species are or could be present in the study area at any given time. The Draft EIS refers to other species in general terms. The risk of impacts on special-status species would be greater than all other species because of their sensitivity, but impact types and mechanisms would be the same for other species.

The Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species database was used as one of the primary data sources for describing animals in the study area because it provides comprehensive information on important fish, wildlife, and habitat resources in Washington and is the principal means by which WDFW provides wildlife and habitat information to public and private entities for planning purposes. The U.S. Fish and Wildlife Service and National Marine Fisheries Service lists of federally listed species were also reviewed. Other nonpriority habitats and species exist in the study area, and those species are referenced generally in the Draft EIS.

While the Important Bird Area program carries no regulatory authority and imposes no legal restrictions or management requirements on any property (public or private), the six areas have been added to Final EIS Section 3.5, *Animals*, to note their significance in addition to the other important areas of Grays Harbor that are currently listed and described in the Draft EIS.

Comment O2-3

Analysis of Impacts

Section 3.5.5.1 No-Action Alternative

According to the Westway and Imperium EISs, the applicant(s) would continue to operate their existing facilities as described under Existing Operations under the no-action alternative. However, the EISs suggest that no evaluation of the no-action alternative is necessary because other types of future development could result in impacts similar to those described for the proposed actions.

"Although the proposed action would not occur, it is assumed that increased growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017-2037). Such development could result in impacts similar to those described for the proposed action."

The EISs have failed to describe the baseline conditions expected under the no-action alternative and in doing so have failed to provide the information necessary to evaluate the impacts of the proposed actions. The EISs offer no evidence of comparable pending industrial projects and the City of Hoquiam recently passed an ordinance preventing any future development of crude oil storage facilities, indicating that the expectation for comparable development is without grounds.

Response O2-3

The analysis of the no-action alternative does not assume that a future development similar to the proposed action would occur at the project site. Refer to the Master Response for Baseline and No-Action Alternative.

Comment O2-4

Section 3.5.5 What are the potential impacts on animals?

The potential ways and pathways through which the proposed projects could affect birds and other wildlife are complex, including direct harm through contact with contaminants or vessel or train traffic; indirect effects through degradation of food and habitat; and the additive effects of long-term exposure to increased vessel traffic, chronic, low-level contaminant exposure, changes to mortality risk, and alteration of movement patterns. In spite of this complexity, the EISs have considered a relatively narrow range of potential mechanisms:

- Noise (construction, rail traffic, vessel transit);
- Spills (facility, train, vessel);
- Introduction of harmful aquatic species (ballast water); and
- Loss of habitat (vessel wake, vessel shade).

Response O2-4

Draft EIS Chapter 3, Section 3.5, *Animals*, describes impacts of construction and routine operation of the proposed action on animals; Chapter 4, Section 4.7, *Impacts on Resources*, describes impacts on these resources that could result from potential spills, fires, or explosions, including many of the specific impact mechanisms identified by the commenter. Per the SEPA Rules, the Draft EIS focuses on impact mechanisms that were considered to have the potential for more than moderate adverse impacts (WAC 197-11-440(6)(b)(i)). Refer to the Master Response for the Purpose and Focus of the EIS.

Comment O2-5

Furthermore, the assessment of these impacts does not include the full suite of animals potentially affected. Under the mechanisms listed above, the EISs have failed to consider:

- Noise: the potential impacts of construction noise on active bald eagle and great blue heron nests, located approximately one mile from the proposed site. [Footnote ii May 20, 2014. Imperium and Westway Environmental Impact Statement Scoping Comments. Michelle Culver, Regional Director, Washington Department of Fish and Wildlife, Montesano, WA.] The EISs fail to reference the known occurrence of these two species, stating instead:
- "... noise from pile driving is anticipated to be greater than 100dBA sound exposure level within 0.85 mile of the project site…no special-status species has been recently documented in the study area and although there is suitable habitat for the bald eagle, blue heron, and peregrine falcon, it is unlikely that these species would be found near the project site. Regardless, if any terrestrial animals are present near the site during pile driving, they could be affected during construction." (3.5-19)

Response O2-5

The study area considered in Draft EIS Chapter 3, Section 3.5, *Animals*, includes the project site and the area within 1 mile of the project site. No Washington Department of Fish and Wildlife priority habitats and species' nest locations for bald eagle and blue heron are located in the study area. Section 3.5.4.1, *Project Site*, indicates that breeding habitat for the these species occurs in the study area, however, and Section 3.5.5.2, *Proposed Action*, acknowledges that construction noise could have an impact on any species in the study area, including bald eagle and blue heron, that are susceptible to noise. The EIS does not attempt address every impact on a full suite of species, but rather addresses overall impact mechanisms that could affect all wildlife species. For example, different wildlife species exhibit different hearing ranges, and it is difficult to state exactly how an animal would respond to a particular noise. Animal response to sound depends on complicated factors such as noise level and frequency, distance and event duration, equipment type and conditions, frequency of noisy events over time, slope, topography, weather conditions, previous exposure to similar noises, hearing sensitivity, reproductive status, time of day, behavior during the noise event, and the animal's location relative to the noise source. In addition, not all wildlife respond the same way to similar sound sources, and not all individuals respond the same way within a species. As such, the discussion for noise impacts on wildlife is generalized to cover the different impacts noise can have on various wildlife species.

Comment O2-6

- Spills: in addition to the large spills that are expected to have catastrophic impacts on local ecosystems, contaminants associated with routine operations at the terminals and small-scale spills from vessel traffic are likely to increase under the proposed projects. Short and long-term impacts from oil spills and surface water run-off containing petroleum-related compounds have not been assessed. According the Department of Ecology's Puget Sound Toxic Assessment, these compounds: [Footnote iii: Ecology and King County, 2011. Control of Toxic Chemicals in Puget Sound: Assessment of Selected Toxic Chemicals in the Puget Sound Basin, 2007-2011. Washington State Department of Ecology, Olympia, WA and King County Department of Natural Resources, Seattle, WA. Ecology Publication No. 11-03-055. www.ecy.wa.gov/biblio/1103055.html. Accessed on 10.26.15.]
- "…cause problems in many animals and plants. They can poison fish, kill fish eggs, and hinder the feeding and shell-formation of shellfish and other invertebrates. They can damage the skin, lungs, liver, and kidneys of birds and mammals and make them vulnerable to deadly infections by suppressing the immune system. Petrochemicals can reduce the reproductive success of fish, invertebrates, birds, mammals, and even plants, leading to population declines."
- The Assessment goes on to explain that copper, which is released into the environment through brake pad wear:
    - "…interferes with salmon's sense of smell, which reduces their ability to avoid predators, find their way back to their birthplace to spawn, and find mates."
    - And that polycyclic aromatic hydrocarbons (PAHs):
        - "...are released by oil leaks, creosote-treated wood, wood smoke, and vehicle exhaust. PAHs that settle in marine sediments cause tumors in marine flatfish, and PAHs from oil spills cause heart defects in young herring and other fish species."

- The effects of petrochemicals and other industrial chemicals on birds are known to range from indirect impacts through loss of food and habitat to mortality due to direct exposure, [Footnote iv: Leighton 1993. The toxicity of petroleum oils to birds. Environmental Reviews 1: 92-103.] immunosuppression [Footnote v: Lattin and Romero. 2014. Chronic exposure to a low dose of ingested petroleum disrupts corticosterone receptor signaling in a tissue-specific manner in the house sparrow (Passer domesticus). Conservation Physiology 2:cou058.] and adverse reproductive effects. [Footnote vi: Fry 1995. Reproductive effects in birds exposed to pesticides and industrial chemicals. Environmental Health Perspectives 103: 165-171.] Although there is evidence documenting the pathways through which these chemicals harm or kill birds, assessing the effects of oil pollution on bird populations remains a significant challenge. [Footnote vii: Albers, P.H. 2003. Handbook of Ecotoxicology. D.J. Hoffman, B.A. Rattner, G.A.Burton, Jr., and J. Cairns, Jr. (Eds). Boca Raton, FL: Lewis Publishers.] This is due in part to the wide-ranging migratory patterns of birds and the difficulty of documenting how mechanisms such as sub-lethal exposure to petrochemicals result in population decline. Nevertheless, significant mortality events have been reported as a result of large spills such as the Exxon Valdez oil spill in Prince William Sound, Alaska, where an estimated 250,000 to 375,000 birds were killed, [Footnote viii: Piatt, J.F. and R.G. Gord. How many seabirds were killed by the Exxon Valdez oil spill?, in Proc. Exxon Valdez Oil Spill Symp., Symposium 18, American Fisheries Society, Bethesda, 1996. 712.] the 1996 Sea Empress spill off the coastal of England, [Footnote ix: Parr, S.J., Haycock, R.J., and M.E. Smith. The impact of the Sea Empress oil spill on birds of the Pembrokeshire coast and islands, in Proc. 1997 Int. Oil Spill Conf., Publ. 4651, American Petroleum Institute, Washington, D.C. 1997. 217.] and the 1991 Arabian Gulf oil spill, [Footnote x: Symens, P. and Suhaibani, A., The impact of the 1991 Gulf War oil spill on bird populations in the northern Arabian Gulf – A review, Courier Forsch.-Inst. Senckenberg, 166, 47, 1994.] and these numbers do not begin to address sub-lethal effects and loss of food and habitat.
- Because the EISs have failed to evaluate the potential impacts to birds (and their prey base) of both acute and long-term exposure to petrochemicals and other industrial chemicals, we have no means by which to assess the risk of significant and unavoidable impacts to marine bird species associated with the terminal expansion projects.

Response O2-6

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses the impacts associated with routine operations, including the potential for incidental spills. As noted in Section 3.3, *Water*, and Section 3.5, *Animals*, the potential for impacts associated with incidental spills would most likely be minimized by containment features and best management practices. The potential for widespread environmental damage related to the risk of oil spills, fires, and explosions is addressed in Chapter 4, *Environmental Health and Safety.*

Comment O2-7

- Introduction of harmful aquatic species: The EISs recognize the potential risk that introduced aquatic species pose to the relatively pristine waters of Grays Harbor. Compared to places like San Francisco Bay and Puget Sound that have high volumes of shipping traffic, the Harbor has had a lower degree of exposure to non-native species. Nevertheless, invasive non-native species have had an effect in coastal Washington, causing considerable economic and ecological impacts. The recent Spartina alterniflora invasion of Willapa Bay and other coastal areas is a good example of an invasive species that degraded foraging habitat for birds and caused considerable

economic impacts for the shellfish industry. [Footnote xi: Spartina fact sheet, Department of Ecology. Available at: http://www.ecy.wa.gov/programs/sea/coast/plants/spartina.html. Accessed 10.28.2015.] The subsequent use of herbicides to control this and other invasions have likely also had indirect effects on ecosystem health in the Bay and nearshore ecosystems. The additional ballast water monitoring requirements that have been recommended by the EISs do not address the potential ecological and economic costs of new harmful aquatic species invasions. This cost should be assessed under the final EISs.

Response O2-7

Potential ballast water impacts on the aquatic environment are covered in Draft EIS Chapter 3, Section 3.4, *Plants*, and Section 3.5, *Animals*. The Washington State ballast discharge regulations (RCW 77.120.040 and WAC 220-150) include reporting, monitoring, and sampling requirements of ballast water; all vessels must submit nonindigenous species ballast water monitoring data. Washington Department of Fish and Wildlife may also board and inspect vessels under WAC 220-150-033 without advance notice to provide technical assistance, assess compliance, and enforce the requirements of Washington State ballast water management program laws and regulations. Penalties and enforcement of not complying with the regulations are covered in WAC 220-150-080. To further minimize the risk of ballast water on vegetation communities and animals, proposed mitigation is included in Sections 3.4 and 3.5 for the applicant to develop and implement a monitoring plan in consultation with Washington Department of Fish and Wildlife prior to the start of proposed operations. Refer to the Master Response for Mitigation Framework for an explanation of how mitigation measures were identified in the Draft EIS.

Comment O2-8

- Loss of habitat: The degree to which changes in the volume and frequency of vessel wakes may impact bird nesting and roosting habitat in the Harbor have not been evaluated. If vessel wakes erode or inundate intertidal beaches or islands such as Goose and Sand Islands in North Bay, Whitcomb, Grass, and Laidlaw Islands in South Bay, or Rennie Island near the mouth of the Chehalis River, important nesting and roosting habitat may be lost. The vulnerability of known avian roosting and nesting locations within the Harbor and along the shore should be assessed, along with the potential for loss of habitat or direct mortality of eggs or young. ESA listed species such as the Snowy Plover and Streaked Horned Lark should be given particular consideration.

Response O2-8

As described in Draft EIS Chapter 3, Section 3.1.5.2, *Proposed Action*, the proposed action would result in a small, incremental increase in vessel trips and the related potential for impacts associated with wakes compared with the no-action alternative. The Final EIS section explains the basis for this conclusion.

Comment O2-9

A number of potential impacts to animals were not assessed in the EISs, including:

- Changes to movement patterns due to artificial lighting;
- Impacts due to vessel traffic; and

- Additive/cumulative effects

Changes in avian movement patterns: artificial lighting

According to Chapter 3, Affected Environment, Impacts, and Mitigation, "the proposed rail unloading and vessel-loading facilities would require some additional lighting for night time operations....Operating hours are not limited to daylight hours; increased light at the dock for night loading is anticipated to occur up to an estimated 200 nights per year."

The effects of artificial light on seabirds are the subject of increasing conservation concern. BirdLife International, a global partnership of organizations dedicated to bird conservation, summarizes what is currently known about the sensitivity of nocturnal seabirds, including many of the Procellariiformes (shearwaters, petrels and albatross) to nighttime artificial light. [Footnote xii BirdLife International (2012) Human disturbance to seabirds at sea. Presented as part of the BirdLife State of the world's birds website. Available from: http://www.birdlife.org/datazone/sowb/casestudy/488. Accessed 10.29.2015] In addition to causing disorientation among foraging individuals, particularly during poor weather and the new moon, young burrow-nesting seabirds are vulnerable to disorientation during their first flight to sea. Both coastal and at-sea light pollution can attract seabirds and disorient them to the point of exhaustion and death. Recent reports of large numbers of Sooty Shearwaters foraging in Grays Harbor at night highlight the vulnerability of local nocturnal foragers to artificial light. The EISs have failed to evaluate the potential for nighttime lighting to impact seabirds, including listed species that migrate through the region and federal and state listed Marbled Murrelets, which regularly travel between marine and coastal forest habitats during the breeding season, April 1 through September 23.

Response O2-9

As stated in Draft EIS Chapter 3, Section 3.9, *Aesthetics, Light, and Glare*, the project site and Port of Grays Harbor are currently well lit and any additional lighting for night operations with the proposed action would be minimal. Lighting would be installed to minimize impacts on offsite receptors (e.g., water, residential uses). Therefore, artificial lighting related to the proposed action is not expected to have a significant impact on avian movement patterns.

Comment O2-10

Changes in avian movement patterns: vessel traffic

According to the Department of Ecology's Grays Harbor Geographic Response Plan, "Grays Harbor has experienced significant economic growth in recent years, accompanied by increased tanker and cargo transport. Vessel arrival data shows more than a 200% increase in the arrival of tankers and cargo vessels since 2006." [Footnote xiii: Grays Harbor Geographic Response Plan. Available from: http://www.ecy.wa.gov/programs/spills/preparedness/GRP/GraysHarbor/GraysHarbor.html. Accessed 10.29.2015.] Not only have the EISs failed to assess the potential impacts of increased vessel traffic on marine birds under the current proposal, the cumulative impacts of the proposed projects in conjunction with this recent increase have not been evaluated.

Little empirical research exists documenting the effects of shipping vessel traffic on marine birds, [Footnote xiv: BirdLife International (2012) Human disturbance to seabirds at sea. Presented as part of the BirdLife State of the world's birds website. Available from:

http://www.birdlife.org/datazone/sowb/casestudy/502. Accessed: 10.29.2015] though somewhat more work has been done to evaluate the effects of recreational boat traffic. [Footnote xv: Stantec. 2014. Technical Memorandum: Effects of Shipping on Marine Bird Movement. To: CEA Agency and BC EAO, June 22, 2014.] We know of one study that assessed the response of scoter, loon and eider species (many of which occur in Grays Harbor) to shipping traffic in the German North Sea. Researchers in this study noted strong behavioral responses to vessel traffic and altered distribution patterns in relation to shipping lanes. [Footnote xvi: Schwemmer et al. 2011. Effects of ship traffic on seabirds in offshore waters: implications for marine conservation and spatial planning. Ecological Applications 21:1851-1860.] Furthermore, species-specific flight reactions to ships varied, suggesting that a one-size-fits-all approach to quantifying the impacts of vessel traffic is not appropriate. Although vessel traffic is not expected to be a significant source of direct mortality to marine birds, the additive effects of lost foraging time and increased energetic output may ultimately contribute to a reduction in fitness for sensitive species, particularly if vessel traffic is concentrated in high quality foraging areas. Marbled Murrelets disturbed by boat traffic in Alaska were observed to have reacted to the disturbance by swallowing the fish being held in their beaks for delivery to their young. [Footnote xvii: Speckman, S.G., Piatt, J.F., and A.M. Springer. 2004. Small boats disturb fish-holding marbled murrelets. Northwestern Naturalist 85:32-34.] Juveniles in this study showed a greater sensitivity to boat traffic than adults. For ESA listed species that forage in the Harbor such as the Marbled Murrelet, the potential ways that increased vessel traffic will impact marine bird behavior must be evaluated and the location of shipping lanes in relation to known marine bird foraging areas should be made clear.

Response O2-10

The increase in vessel traffic related to the proposed action is an existing navigation channel currently used by large commercial vessels. The proposed action would add less than one vessel trip per day on average. Vessel traffic related to the proposed action would not be expected to have a significant impact on avian movement patterns. Draft EIS Chapter 3, Section 3.5, *Animals*, describes impacts of construction and routine operation (including vessel movement) of the proposed action on animals.

Response O2-10

Additive/cumulative effects

The Westway and Imperium EISs have not assessed how the combined effects of potential changes to marine bird habitat, food supplies, chronic and acute exposure to increased levels of petrochemicals and other industrial chemicals, changes in movement patterns due to boat traffic and increased artificial lighting will impact local and migrating marine bird populations. We suggest that the applicants address this shortcoming using a community modeling approach. Ecological community modeling was used in a recent environmental assessment for the proposed Pacific NorthWest LNG project in Port Edward, British Columbia, which supports similar coastal vegetation communities and wildlife species. [Footnote xviii: Stantec Consulting, Ltd. 2014. Chapter 11: Terrestrial wildlife and marine birds, in Environmental impact statement and environmental assessment certificate application. Prepared for Pacific NorthWest LNG Limited Partnership, Vancouver, BC.] Local baseline ecological conditions were characterized using vegetation assessments and terrestrial and marine wildlife field data, allowing researchers to quantify the potential effects of changes in habitat availability on wildlife species with shared habitat requirements and ecological traits. Habitat suitability for listed species, potential changes to wildlife

habitat, changes in mortality risk and potential alteration of movement patterns were evaluated under this framework.

A similar modeling approach is appropriate for the Westway and Imperium EISs and should include wildlife species that are known or are reasonably expected to occur in the project study areas and vegetation communities of known ecological significance, including eelgrass beds and saltmarsh.

Response O2-10

The scope of the cumulative impacts analysis in Draft EIS Chapter 6, *Cumulative Impacts*, is limited to those resources on which the proposed action could have significant impacts in combination with other past, present, and reasonably foreseeable and similar future actions, based on the analyses in Chapter 3, *Affected Environment, Impacts, and Mitigation*, and Chapter 4, *Environmental Health and Safety*. Consequently, the resources analyzed for cumulative impacts in Chapter 6 include air, noise and vibration, tribal resources, rail traffic, vehicle traffic and safety, vessel traffic, and environmental health and safety. The cumulative impacts analysis for environmental health and safety considers potential impacts on animals. As noted in Final EIS Chapter 6, in the event of any one incident, the potential consequences are anticipated to be similar to those described in Section 4.7, *Impacts on Resources*, for the proposed action.

Comment O2-11

Proposed Mitigation Measures

Very few mitigation measures designed to reduce impacts to animals have been proposed for the proposed projects. The three measures that have been proposed (two week cessation of vessel loading during the Grays Harbor shorebird festival, invasive species monitoring plan, underwater sound monitoring during pile-driving) are not capable of meaningfully reducing impacts to animal species.

As stated previously, it is difficult to assess the suitability of proposed mitigation measures when the environmental impacts of the proposed projects have not been adequately assessed. Potential mitigation measures that should be considered under further evaluation of impacts include:

Loss of Habitat

- Wetland habitat compensation, including restoration and compensatory activities to recover the loss of wetland function to terrestrial wildlife and marine fish and wildlife;
- Fish habitat offsetting, including compensatory activities to recover the net loss of marine fish habitat used for foraging by marine birds and mammals.

Alternation of movement

- Eliminate unnecessary skyward and seaward light projection where feasible from ships and terminal;
- Remove unnecessary illumination and reduce light intensity on ships and terminal;
- Assess spatial distribution of marine bird and mammals in relation to shipping lanes;
- Deploy trained Marbled Murrelet observers during pile-driving activities. Pile driving activities should cease if Marbled Murrelets are observed foraging within a pre-determined distance of the activity.

Exposure to petrochemicals and other industrial chemicals

- Implement regular monitoring of contaminant exposure in marine indicator species;
- Provide oil spill bird rescue and response training and coordination;
- Establish a funding mechanism to provide for oil spill cleanup expenditures on land and water.

Ballast water/non-native species

- Establish funding mechanism to ensure early response to invasive species establishment.
- Additive and cumulative effects
- Conduct ecological community modeling to assess the additive effects of project impacts and the cumulative impacts of these and other changes to Port operations.

In summary, Audubon Washington and our 25 independent chapters strongly oppose the proposed Westway and Imperium terminal expansion projects and believe that significant and adverse effects to birds and other wildlife are possible and have not yet been fully evaluated.

Sincerely,

Trina Bayard, PhD
Director of Bird Conservation
Audubon Washington

Rick Jahnke, President
Admiralty Audubon Society

Deb Nickerson, President
Black Hills Audubon Society

Mike Denny, President
Blue Mountain Audubon Society

Jim Herrin, President
Central Basin Audubon Society

Jan McGruder, President
Eastside Audubon Society

Arnie Martin, President
Grays Harbor Audubon Society

Sandy Bullock, President
Kitsap Audubon Society

Tom Gauron, President
Kittitas Audubon Society

Lori Nelson, President
Lower Columbia Basin Audubon Society

Pam Borso, President
North Cascades Audubon Society

Art Campbell, President
North Central Washington Audubon Society

Ken Wiersema, President
Olympic Peninsula Audubon Society

Ron Force, President
Palouse Audubon Society

Kathleen Snyder, President
Pilchuck Audubon Society

Dan Streiffert, President
Rainier Audubon Society

Barbara Jensen, President
San Juan Islands Audubon Society

Cynthia Wang, President
Seattle Audubon Society

Irene Perry, President
Skagit Audubon Society

Tom Light, President
Spokane Audubon Society

Art Wang, President
Tahoma Audubon Society

Eric Bjorkman, President
Vancouver Audubon Society

Ann Spiers, President
Vashon-Maury Island Audubon Society

Anna Swartz, President
Whidbey Audubon Society

George Exum, President
Willapa Hills Audubon Society

Andy Stepniewski, President
Yakima Valley Audubon Society

[Map of Washington's Coastal Estuary Important Bird Areas]

Response O2-11

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses the impacts associated with routine operations, including habitat, light, ballast water, and noise. As noted in Section 3.5, *Animals*, the potential for widespread environmental damage related to the risk of oil spills, fires, and explosions is addressed in Chapter 4, *Environmental Health and Safety*. Therefore, mitigation measures to address potential impacts from the increased risk of oil spills, fires, or explosions are

proposed in Chapter 4. As noted, these measures would help to reduce potential impacts on the environmental resources in the study area. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances of an incident, the environmental impacts could be significant.

O3, Black Hills Audubon Society, Sam Merrill

Comment O3-1

Black Hills Audubon Society

A Washington State Chapter of the National Audubon Society

P.O. Box 2524, Olympia, WA 98507

(360) 352-7299 www.blackhills-audubon.org

Black Hills Audubon Society is a volunteer, non-profit organization of more than 1,300 members in Thurston, Mason, and Lewis Counties whose goals are to promote environmental education and protect our ecosystems for future generations.

I am writing on behalf of Black Hills Audubon Society (BHAS), which appreciates the opportunity to comment on the Environmental Impact Statements (EISs) offered by Westway and Imperium in connection with oil-terminal proposals in Grays Harbor.

Concerning potential effects on animals of their proposed operations, the Westway EIS states simply that "Implementation of best management practices would ensure ... that the potential impact on animals would be low." This statement is too vague to be reassuring. The Imperium EIS is far more specific, detailing the relevant laws, listing specific species of migrating shorebirds and other species using the Grays Harbor area as a critical stopover during avian migration, and identifying special status species. We commend Imperium for providing this detailed overview.

Yet the discussion of environmental impact in the Imperium EIS focuses on the expected effects on wildlife of normal operations rather than the potential catastrophic effects of a major oil spill due to transfer malfunction, vessel collision, or oil-tank rupture due to earthquake The risks of oil-spills are considered at length in Chapter 4 on Environmental Health and Safety of the Imperium EIS, but there is no discussion there about the effects on wildlife of an oil spill, should one occur. Without dealing with the effects of major oil spills, the most dangerous environment impacts of the proposed oil-transfer developments are evaded.

Both the Westway and Imperium EISs indicate that the respective operators would voluntarily cease vessel-loading operations of crude oil during a two-week period including the Grays Harbor Shorebird Festival. These offers are welcome as far as they go. But making these offers recognizes that operations at Westway and Imperium may harm wildlife during migration while at the same time sidestepping the fact that the deadly effects of major oil spills would last far more than two weeks, so that whether one occurred before or during the two-week window, wildlife in the Harbor would be devastated.

As we indicated in our comments on the scoping document, avian migration stopovers of hemispheric significance occur for as many as 24 species of shorebirds within Grays Harbor, including the Grays Harbor National Wildlife Refuge. A single one of these species—the Western

Sandpiper -- involve hundreds of thousands of individuals, comprising most of the world's population of this species.

A major oil spill in spring or fall would devastate migrating species of birds as well as forage fish on which many birds depend, such as herring, sardine, anchovy, surf smelt, juvenile salmon and rockfish. The Grays Harbor Estuary is one of four major staging areas for shorebirds in North America and one of the largest concentrations of shorebirds on the west coast, south of Alaska. Shorebirds gather here in the spring to feed, store up fat reserves, and rest for the non-stop flight to their northern breeding ground. A catastrophic oil spill not only would destroy hundreds of thousands of individual birds but would have the potential to wipe out a species. Because we believe this risk is not worth taking, we believe that permits for the proposed Westway and Imperium oil-terminals should be denied.

Thank you for your consideration of these comments.

Sam Merrill, Chair, Conservation Committee Black Hills Audubon Society

Response O3-1

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses the impacts associated with routine operations, including the potential for incidental spills. As noted in Section 3.5, *Animals*, the potential for widespread environmental damage related to the risk of oil spills, fires, and explosions is addressed in Chapter 4, *Environmental Health and Safety*. Mitigation measures to address potential impacts from the increased risk of oil spills, fires, or explosions are presented in Chapter 4. As noted, these measures would help to reduce potential impacts on the environmental resources in the study area. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances of an incident, the environmental impacts could be significant.

Chapter 4, Section 4.7 *Impacts on Resources*, addresses impacts of oils spills on the environment, including animals and plants; it considers the potential for death of individual plants and animals and addresses acute and persistent or chronic impacts of oil spills on plants and animals, including birds.

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, Recreation, to reflect this clarification.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or within Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

O4, Columbia Riverkeeper, Dan Serres

Comment O4-1

COLUMBIA RIVERKEEPER

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November 30, 2015

Sally Toteff
Director, Southwest Region
Washington State Department of Ecology
300 Desmond Drive SE
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Mr. Brian Shay
City Administrator
City of Hoquiam
609 8th Street
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Submitted Via Web Portal

RE: Westway & Imperium Draft Environmental Impact Statements

Dear Mr. Shay and Ms. Toteff:

Columbia Riverkeeper ("Riverkeeper") submits these comments on the Draft Environmental Impact Statements ("DEISs") for the proposed Westway and Imperium crude oil-by-rail terminals. The DEISs are inadequate because they provide little substantive analysis of how increased train traffic along the Columbia River will impact the health, safety, and water resources of nearby communities. Notwithstanding this and other flaws, the DEISs show that the projects will cause significant impacts to public safety and the environment that cannot be mitigated. Accordingly, Riverkeeper urges the Department of Ecology ("Ecology") and the City of Hoquiam to use their substantive SEPA authorities to reject the Westway and Imperium crude oil terminals.

The DEISs do not adequately analyze the risk of, or impacts from, an oil train derailment near or into the Columbia River. Riverkeeper therefore requests that Ecology and the City of Hoquiam revise the DEISs to meaningfully analyze risks to the Columbia River and to communities along the rail route in the "extended study area" from Spokane through Vancouver. The DEISs spill scenarios were purportedly "developed for a range of potential incidents involving the terminal, trains and vessels." In reality, the spill scenarios in the DEISs only address spills from the PS&P rail line—excluding the Columbia River and groundwater resources along most of the rail route.

Over a dozen crude-by-rail accidents have highlighted the spectacular risks associated with shipping Bakken crude oil. Nevertheless, the DEISs fail to analyze how a large oil spill from a train derailment would impact the Columbia River. A major oil spill entering the water as a result of a derailment is not unforeseeable: for instance, an oil train derailment in Lynchburg, Virginia, sent a sheet of burning Bakken crude into the James River. Crude oil derailments have released hundreds of thousands of gallons of crude oil into the environment. The derailments in Aliceville, Alabama; Mount Carbon, West Virginia; and Casselton, North Dakota, released 630,000; 378,000; and 476,000 gallons crude oil, respectively. The final EISs must assess how a spill of this magnitude would affect the Columbia.

A large spill in or near the Columbia River would harm salmon, wildlife, nearby communities, and potentially contaminate drinking water supplies. A spill into the Columbia River could also disrupt treaty-protected fishing rights, commercial and sport fishing, river recreation, shipping, hydropower generation, and other economic activity in and near the Columbia River. These impacts could undermine important uses of the Columbia River for years to come. The DEISs fail to meaningfully describe or address these impacts, which are significant and cannot be fully mitigated.

The DEISs also fail to take a hard look at the public safety implications of the Imperium and Westway terminals' crude-by-rail traffic. A major fire associated with a crude oil spill would quickly overwhelm the response capability of any community along the Columbia River rail route. In the context of the Vancouver Energy Distribution Terminal ("Tesoro-Savage Project"), every fire department along rail route from Idaho to Vancouver responded that it required additional resources to handle a crude oil spill, fire, or explosion. The Tesoro-Savage DEIS states:

> "All responding agencies indicated the need for additional resources to respond to one or more spill event scenarios, particularly the larger spill and associated fire and/or explosion scenarios. For example, seven responding jurisdictions reported that they would need additional AFF foam to adequately respond to a small oil spill scenario and still maintain the ability to respond to other calls for service in the community. For the medium to very large spill scenarios, most responding agencies would not have access to sufficient foam and foam applicators, and only VFD reports having its own high-volume pump and foam unit. In rural areas in particular, sufficient foam and water supplies may not be available to effectively implement and sustain fire-suppression strategies. Even in urban areas, such as Vancouver, foam supplies may be spread out geographically, require permission to be used, and take time to collect (Eldred 2015).

All responding jurisdictions identified this need for hypothetical large and very large spill event scenarios. For all spill scenarios, responding agencies most frequently cited the need for additional staffing to adequately respond to an incident and other calls for service within the community, closely followed by the need for additional logistical support (Table 4-11)."

See Tesoro-Savage DEIS, p. 4-48 (Nov. 24, 2015). Instead of addressing the lack of capacity to respond to a major derailment and fire—or the need for significant evacuations in the event of an accident—the DEISs contain vague statements like: "the potential for significant adverse impacts on the environment and human health in the case of such an incident is high." Accordingly, the DEISs do not adequately analyze of how the citizens of Spokane, Pasco, and cities and towns in the Columbia River Gorge would be impacted by a crude-by-rail accident.

Response O4-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the

reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment O4-2

The DEISs do describe the potential toxic air impacts of a crude oil spill, but they do not discuss how much toxic exposure communities along the rail lines might experience during an accident. Bakken crude oil contains toxic volatile organic compounds, like benzene, that contaminate the air after an oil spill. Homes and buildings miles away from the Casselton, North Dakota, spill in 2013 were evacuated because of potentially toxic plumes of smoke from burning Bakken crude. Toxic exposure can also endanger and delay first responders attempting to contain a spill or fire, an issue largely omitted from the DEISs.

The DEISs also fail to discuss how different types of crude oil behave when spilled. Because the proposed Grays Harbor terminals could accept diluted bitumen or other forms of crude oil, the DEISs' spill scenarios should have evaluated the full range of potential petroleum products. When diluted bitumen spills and begins to degrade, it can sink and escape booms. A spill of tar sands oil into the Columbia River would be extraordinarily difficult to address. In Michigan's Kalamazoo River, a spill of diluted bitumen from the Enbridge Pipeline resulted in heavy oil sinking and settling over many miles of river bottom. No mitigation measures have been identified to address effectively an oil spill into the Columbia River involving sunken oil.

Response O4-2

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

Comment O4-3

Finally, Ecology must quantitatively analyze the potential for derailments and spills into the Columbia River from the trains serving the proposed Grays Harbor oil terminals. Ecology prepared such an analysis for the PS&P rail line, and an ongoing SEPA process for Tesoro-Savage's Project [Footnote 1: The Washington Energy Facility Site Evaluation Council ("EFSEC") released its DEIS for the Tesoro-Savage Project on November 24, 2015] includes such an analysis for the Columbia River. The oil trains serving the Grays Harbor oil terminals present the same types of risks as those serving the Tesoro-Savage Project, and the three Grays Harbor Projects would significantly add to the risks described in the Tesoro-Savage DEIS. To assist Ecology in analyzing the risks of a train derailment and oil spill to the Columbia River resulting from the Grays Harbor terminals, and the cumulative risk of an oil spill into the Columbia River, Riverkeeper hereby incorporates by reference the recently released DEIS for the Tesoro-Savage Project, including Exhibit E thereto.

Although flawed, the DEISs do provide ample evidence to deny the Westway and Imperium oil-by-rail projects. The risk of a Bakken or heavy crude oil spill from increased oil train traffic associated with the projects cannot be fully mitigated. And, if a spill occurred, the environmental damage would be significant. For these reasons, Riverkeeper urges Ecology and the City of Hoquiam to use their substantive SEPA authorities to reject the Westway and Imperium crude oil terminals.

Sincerely,

Dan Serres
Conservation Director, Columbia Riverkeeper

Response O4-3

Refer to Response to Comment O4-1.

O5, Columbia Riverkeeper, Dan Serres

Comment O5-1

My name is Dan Serres. I'm the conservation director for the Columbia Riverkeepers. Good to see some of you again.

I'm here to talk about the fact that the DEIS really falls short in one key area, which is looking at the impact on the Columbia River itself. The DEIS based this on the last 50, 60 miles between Centralia and Grays Harbor and left out of the analysis the rest of the state.

Despite that, the DEIS does a good job by identifying common sense conclusions, and most important conclusion is that no mitigation is noted even in the event of the possibility of a large spill, and damages—and no mitigation measures could effectively deal with what would come after.

We don't have to imagine what it would look like. We have seen what happened in Quebec. We've seen what happened in the Kalamazoo River in Michigan when oil that was supposed to float sank and poisoned downstream habitat for miles and miles beyond. We just have to imagine what that would look like here.

What this DEIS doesn't do is take what we know about the danger of this substance, this crude oil, and the full range of this light, volatile Bakken oil to the very dense tar sands, and put that in the Columbia River.

Another specific gap I will point out, the DEIS fails to look at drinking water supplies. And very significantly it fails to look at them outside of this area. The City of Vancouver, Washington recently came up with the decision that unhealthful impact—environmental impact likely for a small oil facility, and it specifically noted that City of Vancouver's drinking water wells, at least one of them, is within a couple hundred feet from the BNSF rail line. And if there was a spill in that area, they would shut down that well. And it was a risk it identified.

What we know is the DEIS needs to take a look at not just what happens here, but the entire state of Washington. And the Department of Ecology and the part of the group leading this, I encourage you to look at the entire state and find that this affects the state as a whole.

Response O5-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Draft EIS Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on groundwater. Section 4.7 discusses impacts in general terms (for the reasons discussed in the Master Response for the Environmental Health and Safety Analysis). The impacts can be similarly applied to the extended study area.

O6, Earth Ministry, Jessie Dye

Comment O6-1

Hi. Thank you. My name is Jesse Dye. I am with Earth Ministry. We represent three to 5,000 members of faith community around the state, and 300 congregations, and many dominations. Well, the issue tonight is the content of the DEIS.

I want to check with you about the process. These hearings are challenging, intense, and obviously a lot of strong sentiment against these projects for a variety of reasons. But I want to thank you for listening to us. Thank you for giving us a voice. I want to uphold your patience. I know it's grueling.

I want to tell you that our intentions are good. We're here to participate in the process of democracy, and I know you're here to participate in the process of democracy as well and give us a voice. I want to thank you.

I want to address Brian Shay. I think we may be co-religions, Catholics, but I want to say on behalf of our faith we do have a power, and you do have the power to turn down the process under the rules given to you. And I ask you to do that on behalf of the moral call here tonight.

I thank you for listening. I thank all of you and I uphold the audience who are doing a wonderful job giving input.

Thanks so much.

Response O6-1

Comment acknowledged.

O7, Earth Ministry, Jessie Dye

Comment O7-1

Hi, I'm Jessie Dye. I represent Earth Ministry. Earth Ministry has 5,000 members of the faith community from around the state, numerous congregations and denominations.

In particular, I'm here tonight testifying on behalf of Pope Francis. We laugh, but in fact Pope Francis says over and over again and very specifically, leave the fossil fuels in the ground. He says the time to—that the time to use fossil files is over.

Bringing that down to the specifics of these Draft Environmental Impact Statements, for offense, and I know you guys are working really, really hard, this is an awfully weak Draft Environmental Impact Statement.

Specifically, I'm going to speak about mitigation. The mitigation sections in every regard basically say, we cannot mitigate this. But the specific question I have for you is, in the event of any of the possible risks, how is that going to be paid for? There's no evidence of significant insurance to pay for the mitigation involved. If you don't have a plan for that, it doesn't exist.

In the end, on behalf of the all of us, on behalf of your children and my children and all God's creatures, I ask for you to deny this permit.

Response O7-1

Comment acknowledged.

O8, Earth Ministry, Jessica Zimmerle

Comment O8-1

Hi. My name is Jessica Zimmerle. I'm from King County in Seattle, and I'm out her today to raise the world voice of this issue which I've heard so many people already make great statements on.

But I'm representing a position called Earth Ministry, and we were founded 27 years ago actually after the Nestucca oil spill here in Grays Harbor. We had people of faith come out and clean shorebirds, and have similarly experience of why doesn't our faith tell us anything about this.

Oh, wait, it tells us a lot about this, in that we have a moral obligation to do better and to create a safer world for all of God's children.

In reading all of the information on this project, I came across a number that 6,000 kids Pre-K through high school would be in the blast zone every day here in Grays Harbor County. I would like

to know what the evacuation plan, is something going to go wrong. And kids are afraid of monsters under the bed and how do we soothe them when they actually have explosive of oil trains of death rolling by where they're trying to learn.

Also, in working on this project we've been really struggling to come up with a word for something that is not mitigatable. That's really what it comes down to is that you can't mitigate these projects and if we can't come up with a word for something so dangerous I would really urge you not to go forward with that.

Finally, I want to just thank everyone in the room and maybe ask for a show of hands if you are opposed to these projects. I really appreciate everyone spending their day here. I mean, look at this crowd.

And just think of all the people who aren't privileged to spend their afternoon here because they're working. And thank you.

Response O8-1

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

O9, Eastside Audubon Society, Peter Marshall

Comment O9-1

Good evening. My name is Peter Marshall, with the Eastside Audubon Society located in Kirkland. We're not directly recognized for the marine, but we do have a concern for the environment -- all the birds, the migratory path specific for any migratory and resident birds, and with Grays Harbor being a central part of that.

We have specific comments and I haven't had a chance to review that, and I will send comments by the deadline. And somebody mentioned the 1988 spill of the large Nestucca that took many volunteers in the cleanup of birds and the attempt to rehabilitate animals and birds from that. They had a convention center full of birds, struggling to regain their health. It was a lot of suffering for the animals and for people. I wouldn't like to see that happen.

Response O9-1

Comment acknowledged.

Comment O9-2

Some of the documents mention the increase in vessel traffic, looks like 1,200 additional train trips per year, and looks like three a day, I believe. And vessel traffic, about 700 additional trips, sounds like about two vessels a day, and with only 231,000 gallons and the additional risk involved. Please pay attention to that.

Response O9-2

As described in Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, operation of the proposed action at maximum throughput would add 238 tank vessel trips per year (0.7 trip per day on average) along the navigation channel to projected large commercial vessel trips under the no-action alternative—between 338 and 436 large commercial vessel trips per year in 2017 and 2037, respectively (approximately one trip per day on average). This represents 576 projected trips in 2017 and 674 in 2037; half of these trips would be laden vessels.

As described in Chapter 6, *Cumulative Impacts*, at maximum throughput operations, the cumulative projects—the proposed action, the REG (formerly Imperium Terminal Services) Expansion Project, and Grays Harbor Rail Terminal Project—would add 758 trips to baseline projections for a total of 1,096 trips in 2017 and 1,194 trips in 2037, half of which would be laden.

O10, Eastside Audubon Society, Jan McGruder

Comment O10-1

25 November 2015

Westway and Imperium Expansion Projects EISs c/o ICF International

Attn: D. Butorac, B; Shay

710 Second Avenue, Suite 550

Seattle, WA 98104

Subject: Comments on Draft EIS's

Dear Ms. Butorac and Mr. Shay

We are writing to amplify the comments we made at the October 8th public hearing in Aberdeen.

Eastside Audubon is a chapter of the National Audubon Society, with approximately 1100 members living in our northeast King County area of concern. Although geographically we are inland from marine shorelines, we share broad environmental concerns with other chapters in the state of Washington and elsewhere. Some of our members were involved as volunteers down at Ocean Shores in December, 1988, trying to clean and rehabilitate some of the birds and other wildlife after the Nestucca barge spilled 231,000 gallons of oil in that area. They remember a massive effort that filled the convention center, and a lot of suffering by the birds and the people trying to save them.

Description of Proposed Action

A fundamental measure of local impact on the Grays Harbor communities is the number of unit trains and vessels expected to serve the expanded terminals. It seemed a little careless for the EIS

authors to describe (p. S-3) the Westway terminal's 23 additional vessel trips per year to Puget Sound and California refineries as about one vessel trip "every other day". If that were the case there would be about 1/2 of 365 vessels or only 182·vessel trips rather than 238. Probably not intentionally imprecise but it raises questions about why the impacts generated by an additional. 58 vessels per year are considered so insignificant that they are not accounted for.

Tribal fisheries could be substantially affected by this kind of discrepancy. Table S-1 on p. S-16 of the Westway DEIS notes that the increased vessel traffic would exclude tribal fishers from part of their traditional fishing area within the navigation channel, approximately every other day when tanker vessels come and go. The actual number of disruptions appears to be 238 days, some 15% greater, which could be significant. The lmperium Terminal traffic would add another 400 vessels per year, so the total 638 vessels per year would mean that tribal fisheries would be disrupted almost twice everyday on the average. This is considerably more disruption than the "every other day'' stated in the Westway DEIS.

Response O10-1

In general, the proposed action trip numbers are approximated throughout the EIS for simplicity. However, exact numbers are used in quantitative analyses in the Draft EIS, including the vessel capacity analysis in Chapter 3, Section 3.17, *Vessel Traffic*. The Final EIS Chapter 2, Section 2.1.4.2, *Proposed Operations, Vessel,* and references to vessel trips throughout the Final EIS, have been revised to reference "0.7 trip per day on average."

Comment O10-2

Predicted Tank Car Safety

We believe the, discussion of oil train risks, while extensive, is probably sugar-coated and overly optimistic about the unanticipated conditions that can make oil-by-rail shipments so destructive. Pages 4.5.5-4.5.6 tell us a small rail transport spill (up to 1000 gallons) could occur once in 100 years, a large (three car, 90,000 gallons) spill once in 250years; and a larger (five-car, 150,000 gallons) spill once in 4,800 years. A really exceptional (30-car, 900,000 gallon) spill is predicted to occur once in 10,000 years with current rail cars, or once in 74,000 years with rail car improvements.

Expression of these risks in terms of statistical probabilities seems deceptively reassuring. As page 4.1-3 says, the larger the spill, the less likely it would be to occur. But another dimension of risk is described in Figure 4.5-2 which shows that while a 30-car spill is "unlikely", there is a "high" likelihood of such a spill reaching water and its potential environmental impact is "severe".

Expressions of risk such as once in 100 year probabilities lull the reader into thinking the risk is minimal and therefore negligible. But many factors can combine to make the event happen in year one or two of the 100-year period consider the actual occurrences where "100-year floods" have recently occurred sooner or more often than expected. Then consider that 10 crude oil trains have exploded and/or burned recently In North America, including the Lac Megantic accident that killed 47 people and incurred billions of dollars in liability. Actual events have included frequent train derailments, clue to infrastructure failures, operator errors, weather, etc., the most recent being two derailments this month in Wisconsin within a two-day period. In one, 13 cars went off the tracks, with one tank car punctured and leaking oil. In the second instance, train derailment spilled

thousands of gallons of ethanol from 5 tanker cars. BNSF crews fortunately were able to prevent the spill from reaching the shoreline by timely placement of booms.

Upgrading and retrofitting of the riskiest old DOT-111 tanker cars has been built into the DEIS' rosy estimates of oil train accidents. Actual reports on such upgrades indicate many factors that could slow down the rate of modernization. Even the DOT-1232 tanker cars that are expected to be the new standard by the year 2037 are not foolproof. The derailment in West Virginia in February of this year involved newer DOT-1232 tanker cars that leaked oil into the Kanahwa River.

Predicting large spill frequencies of once per thousands of years conveys a very unrealistic sense of safety. One obvious party concerned with such frequency-of-occurrence estimates are the Insurance companies who would be financially affected. See below.

Response O10-2

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment O10-3

Terminal Risks

The Draft EIS's appear to have a similar tendency to underestimate seismic risks in the very vulnerable Grays Harbor area. Northwesterners are increasingly aware of the probability of the “Big One” occurring within our lifetimes. In addition to the enormous quantities of crude oil on the rails, on bridges over waterways, etc. would be added the 114 million gallons in the expanded Westway and lmperium terminals. While such facilities may be state of the art for containment of routine spills, they would seem inadequate to withstand a 9+ subduction earthquake, and a likely tsunami to follow. Geologists have estimated the odds of a “big'' Cascadia earthquake in the next SO years at about one In three, and the odds of a “very big” one at about one in ten. The U.S. Geological Survey estimates this overdue earthquake could produce waves from 20 feet to more than 100 feet high, a wall of water that could topple storage tanks. Remembering the Fukushima disaster, debris from which has recently arrived on our shores, such a scenario is not unthinkable.

Do the Draft EIS's intend to suggest that the terminal facilities will be of such extraordinary invulnerability that they could survive an event of that magnitude? Or are they hoping that the geologists' estimates of a likely “Big One” are wrong?

Response O10-3

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment O10-4

Description of Bird and Wildlife Impacts

The existing Environmental Health and Safety fact sheet says that the likelihood of a large spill from vessel grounding is somewhere between “likely” and “unlikely'', and that spilled oil from such an accident potentially would have a “severe” environmental impact. These terms are so generic they tell us little about what oil terminal expansions, oil train and vessel impacts mean in the real world.

We think the Final EIS should describe oil spill impacts more specifically in terms of birds and other affected wildlife. This is not only because we are an Audubon chapter. It is because birds and wildlife stand to be impacted most directly if an adverse event happens after the oil terminals, vessels and trains start carrying enormous quantities of oil that is toxic to their habitat. Impacts should be described as vividly as possible, rather than vaguely as in the Draft EIS. So if the Nestucca's 231,000 gallon spill resulted in about 3500 dead birds in 1988, then the possible future vessel collision or grounding losses of 105,000 or even 15.l million gallons (described in Table 15 on page 5-6) could be expressed as potential multiples of the Nestucca casualty rate. Even allowing for all the variables that could make the casualty rates greater or fewer, the potential magnitude of impacts could then be visualized in a meaningful way.

In addition to estimates of potential bird and wildlife losses, the document should also include estimates of the volunteer and nonprofit organization hours and expenses for rescue and rehabilitation efforts. These would be in addition to the time and money required by governmental and corporate organizations. These data can be derived from the 1988 Nestucca incident, and would be essential for understanding the oil terminals' full environmental impacts.

Response O10-4

The approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O10-5

Vessel Impacts on Whales

The summary description of rail and vessel transportation impacts appears to minimize the risk of vessels striking whales, stating they are mainly offshore out of danger. Page S-10 mentions the increased risk of vessels striking marine mammals, with the biggest potential being in the shipping lanes ". . . which are located outside of state waters. This is because large mammals, such as whales, typically migrate and forage in deeper waters and are not likely to enter the harbor . . "

The significance of being outside of state waters is not explained. Is it less significant because Washington State jurisdiction ceases outside the harbor? The impact on marine mammals would be the same no matter where the jurisdictional boundary might be.

The DEIS assertion that whales would typically be in deeper waters is also curiously at odds with a differing statement in the Grays Harbor Geographic Response Plan, prepared by the Washington Department of Ecology and published December 2013. Page 6-6 of that document says "Migrating Gray Whales commonly feed in the bay during the northward migration from March through June. Occasional resident grays may also be seen, especially around the mouth of the bay...." The discrepancy in these two accounts should be carefully addressed, and the ship traffic impacts on marine mammals revised or qualified in the final EIS.

Response O10-5

Final EIS Chapter 3, Section 3.5, *Animals*, reflects additional information to address whale use of Grays Harbor, including frequent use by the gray whale. The vessel impact mechanisms described in Section 3.5 remain the same, but the Final EIS section clarifies that marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a greater risk from vessel strikes. As described in Section 3.5, the likelihood of vessel strikes and the potential for population-level impacts be low; therefore, potential impacts are not considered significant. The Final EIS Summary also reflects these clarifications.

Comment O10-6

Impact Mitigation for Birds

Table 4.7-1, Chemical Properties and Mechanisms of Impact on Plants and Animals, describes impacts including physical smothering of leaves and soil, necrosis and death due to toxicity, drowning of animals due to lost buoyancy, lost insulation and hypothermia, organ damage, behavioral changes and increased predation risk, genetic changes and reproduction impairment.

The DEIS describes the Westway and lmperium applicants voluntarily committing to a cessation of operations for two weeks during the annual shorebird festival. This is described (p. S-39) as reducing " . . .the risks of spills affecting high numbers of migratory birds during peak spring migration... The applicant will halt crude oil vessel loading operations for a period of two weeks overlapping the annual . . .event".

On one level this appears to be a generous and sensible accommodation of a local activity. However, can it be that the terminal facilities need to be closed down annually for major maintenance anyway? There may be a public relations advantage in making the oil terminals seem less threatening than they would if vessels and trains were operating at their normal levels. Festival visitors will certainly enjoy the reduced number of trains blocking local at-grade crossings. Visitors may get the impression that the oil terminals are very good neighbors with very few apparent

impacts, as migrating birds rest and feed without disturbance from oil vessel shipments for that two week period each year.

But if the terminal, train and vessel operations were of minimal potential impact on the migrating birds or the visitors at Grays Harbor, why would the 2-week closure be considered necessary? The Final EIS should explain this mitigation's rationale in much more detail.

But those very environmental impacts and risks would resume after the Shorebird Festival and continue for the remaining 50 weeks of the year. Other species of birds and plants and wildlife would not enjoy the same protection. Important birds whose migratory schedules may be slightly different, would not benefit from this proposed two-week mitigation. What about the large concentrations of Brown Pelicans that feed and roost in the bay from mid to late summer? Or the waterfowl concentrations that occur from fall through spring; especially in North Bay? Or the large numbers of fall-migrating and wintering shorebirds?

Fishery Mitigation Measures

Regarding tanker vessel traffic impacts on tribal fisheries, page S-16 says ". . . If mitigation measures are not feasible [for almost twice daily exclusion from their typical fishing areas within the navigation channel] the proposed action ... could result in unavoidable and significant adverse impacts on tribal resources . . . "

This seems an odd statement to include in the DEIS. Why was feasibility of this mitigation not determined before publication? The EIS should estimate impacts after mitigation. It certainly raises questions of treaty rights, and whether these have been negotiated or litigated with the affected tribe(s). The Final EIS certainly cannot be considered complete until these questions are answered.

Response O10-6

Refer to the Master Response for Mitigation Framework. Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification.

Comment O10-7

Financial Responsibility

Page 4.5-17 of the DEIS addresses the question of who would pay for response and cleanup of a rail transport spill when waters of the United States could be threatened. The document asserts that the polluter pays for such costs and damages, and that the federal government has established "high limits" on that liability, and that Congress has established a $ 1 billion Oil Spill Liability Trust Fund to pay for expeditious oil removal and uncompensated damages. The DEIS further notes that Washington State places no limits on liability of polluters to third parties, allowing recovery of cleanup costs and natural resource damages beyond the federal limit. Various other federal statutes are listed to suggest how compensation can be obtained from responsible parties.

These statements convey a sense that mechanisms are in place to assure that the polluter will pay. But all of these measures to allow recovery of costs all seem to depend on one thing-the financial ability of the polluter to pay such costs. And that would clearly depend on insurance. See below.

Insurance Coverage

The DEIS text fails to mention that the Congressionally-established $ 1 billion trust fund amount does not come close to meeting conservative estimates of liability and other costs. A September 8, 2015 Wall Street Journal article titled "Fiery Oil Train Accidents Raise Railroad Insurance Worries" quoted James Beardsley of the prominent insurance firm Marsh·& McClennan as follows:

> ". . . There is not currently enough available coverage in the commercial insurance market anywhere in the world to cover the worst-case scenario . . . "

To put this statement into perspective, the Lac Megantic disaster in Quebec incurred an estimated $2 billion in liability costs. (More recent estimates appear to approach $3 billion.) Cleanup costs alone are estimated at $200 million. The train operator in that incident carried just$25 million in liability insurance coverage, and filed for bankruptcy protection after the accident. The federal, provincial and local governments (taxpayers) will therefore cover most of the costs. So it seems that railroads, even a prosperous one like Burlington Northern Santa Fe, will not be able to cover the costs of a major explosion and/or fire along its rails in Washington State.

The situation for small railroads is even more striking. According to a Sightline 'Institute article dated October 19, 2015, the regional rail company (Puget Sound and Pacific) that would transport oil from the BNSF main line to the terminals in Hoquiam may have a maximum of $500 million in liability coverage through its parent company. However, that company, Genesee and Wyoming, has refused to publicly disclose its insurance coverage. Government officials at federal, state and local levels appear powerless to confirm these figures and therefore have no way to estimate the financial risk to communities through which this dangerous cargo would pass.

A summary table of "applicant measures to address impacts" on page S-5O notes that". . . prior to beginning the proposed operations, the applicant will conduct a study to identify an appropriate level of financial responsibility for the potential costs for response and cleanup of oil spills, natural resource damages and costs to state and affected counties and cities . . .The study should identify any constraints related to the commercial availability and affordability of financial responsibility . . . " This proposed "applicant measure" appears intended to be undertaken after the EIS is finalized and perhaps after permits are issued and the applicant is preparing to begin proposed operations. This kind of study should clearly be undertaken and completed before the EIS is finalized. And unless such a study showed how the applicant railroad could address all of the insurance constraints described above, there would seem to be no basis for the Department of Ecology to conclude that financial responsibility requirements can be met.

The Final EIS must address this insurance information deficit. State and local agencies involved in permit decisions on the project must be fully aware of the data and how it affected their decisions. Their reasoning should become part of the public record, so that the public can see how such risks are being evaluated and managed by public officials on their behalf.

Conclusion

Nothing in the Draft EISs persuaded us that the project impacts are acceptable in such an environmentally sensitive area. The document concluded that proposed mitigation measures could reduce impacts of a catastrophic spill from a train, terminal or tank vessel failure, but that the

impacts would nevertheless be significant and unavoidable. The nature and scale of those impacts are so massive that we think permits to expand the oil terminals in Grays Harbor should not be issued.

Thank you for the opportunity to review and comment on the DEIS: We will look forward to reviewing the Final EIS when it is available.

Sincerely,

Jan McGruder, Chapter President

Peter Marshall, Conservation Committee Chair

Response O10-7

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS

O11, Extreme Oil Campaign Director, Matt Krough

Comment O11-1

November 30, 2015

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Mr. Brian Shay City Administrator City of Hoquiam 609 8th Street Hoquiam, Washington 98550 bshay@cityofhoquiam.com

Westway and Imperium DEIS c/o ICF International 710 Second Avenue. Suite 550 Seattle, Washington 98104

Re: Comments re: Environmental Justice within the Draft Environmental Impact Statements for the Westway & Imperium oil train terminals proposed for Hoquiam, Washington

Dear Ms. Toteff and Mr. Shay—

Thank you for the opportunity to provide comments on these projects' draft environmental impact statements (DEISs). Comments below refer to the DEISs for both the Westway and Imperium oil terminals, referred to below as “terminals” or “proposals.” The Environmental Protection Agency (EPA) defines environmental justice (EJ) as the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income in the development, implementation, and enforcement of environmental laws, regulations, and policies. The DEISs, as issued, fail to meaningfully involve EJ communities along the rail route, fail to adequately analyze disproportionate impacts that would be felt by those EJ communities should the oil train terminals be permitted, and inappropriately limit the scope of analysis to the three counties on the PS&P rail line.

It is essential that the Final Environmental Impact Statements (FEIS) contain thorough analyses of potentially impacted EJ communities, beginning with actively soliciting participation from impacted communities to determine the likely disproportionate impacts from the projects. Examples of these potentially disproportionately impacted EJ communities exist outside of the 3 county study area. As with the recently released DEIS for the Tesoro Savage proposal, the study area for these terminals should include, at minimum, the entire rail route for both full and empty trains through the state of Washington, in addition to the likely routes in North Dakota, Montana, and Idaho.

An earlier analysis of EJ consequences of oil train traffic in California clearly showed the increased likelihood of a census tract block qualifying as an EJ community based on proximity to the tracks (http://www.forestethics.org/news/crude-injustice-rails-california). If that pattern holds true for Washington and the rail line from North Dakota to the terminals, any additional human health impacts along the rail lines could be determined to have disproportionate effects on EJ communities.

The analytical lenses of race and poverty expose new dimensions to environmental and economic issues. The transportation of oil and coal by rail presents a particularly serious threat to Washington's low-income communities and communities of color living along rail lines because they are more likely to be linguistically isolated, have fewer economic resources, and be impacted by structural racism and other discrimination. Existing socioeconomic disparities such as these exacerbate the effects of any negative impacts to their local environment, including increased traffic of volatile oil on nearby railroads. The impacts of these proposals must be quantitatively evaluated in the context of other health impacts on vulnerable communities, and not examined in isolation.

If built, these projects would have impacts on rail communities from the point of extraction to the offloading sites themselves, with higher numbers of oil trains guaranteed. A “no action” alternative, if selected, would protect vulnerable communities along the rail route from all of the impacts of these projects.

Sample analyses of additional affected areas outside of the study area of these DEISs are included as attachments. The conditions in these communities may represent multiple other communities that would be impacted by an increase in oil trains.

Response O11-1

Draft EIS Chapter 7, Section 7.2, *Social Policy*, includes an analysis of impacts on minority and low-income populations. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*. Refer to the Master Response for Geographic Scope of the EIS. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Comment O11-2

The remainder of this comment letter includes the following:

- Procedural suggestions to ensure that environmental justice considerations are addressed in the FEISs drafting processes;
- Case study of Fruit Valley neighborhood in Vancouver, WA, where impacts of current and proposed oil (and coal) trains will be felt as the trains transit the Columbia Gorge and turn north; and

- Maps and data of example communities that represent the types and locations of areas impacted by the proposals, should they be permitted. This list is an incomplete sample of problem areas in need of thorough analysis from an EJ perspective and active efforts at consultation with impacted community members.

Response O11-2

Refer to Response to Comment O11-3 regarding the analysis of impacts on minority and low-income populations in the Draft EIS.

Refer to Response to Comment O11-4 for information about the analysis of air quality in the Draft EIS.

Refer to Response to Comment O11-7 for information about consideration of the maps identified in this comment letter.

Comment O11-3

Procedural Suggestions

Use EPA's 2015 EJSCREEN Data

Preparation of the DEISs for each of these projects relied in large part on dated methodology. The FEISs should perform analyses using the 2015 data available here: http://www2.epa.gov/ejscreen.

Addressing acute impacts vs. averaging is essential for environmental justice analysis

When investigating potential impacts of increased oil train traffic in environmental justice communities, or wherever sensitive populations are found who may be impacted by the project, it is important to focus on both acute and average impacts. Averaging of impacts over time and space reduces the apparent effects of the detrimental effects on specific populations. For example, acute PM 2.5 exposure over a 1 to 4 hour period has been shown to contribute to cardiac ischemia during exercise (Particulate Matter Air Pollution and Cardiovascular Disease: An Update to the Scientific Statement from the American Heart Association, May 10 2010, accessed at https://drive.google.com/file/d/0B8YDhXs8GFwJRnEwQ1hKRXBVSWxZeDZfRnFTMFRRWVJuelU4/view?usp=sharing). Averaging the amount of PM 2.5 emitted by diesel engines over the course of a year or even a day means that the effects of the spikes experienced by nearby residents during a single train passage are diminished in importance. Analysis of diesel particulates must include the impacts of engine emissions shortly after the passage of a train on residents and school children in close proximity to railways. Sensitive populations living, working, and studying in proximity to the rail lines, e.g. asthma sufferers and the elderly, should be evaluated for direct impacts.

Likewise, health impacts from noise are known to include cognitive development in children, cardiovascular disease, sleep disturbance, and mental health issues. (Whatcom Docs appendix to the Gateway Pacific Terminal EIS scoping process, accessed at http://www.coaltrainfacts.org/docs/appendix-D.pdf) As seen in the maps attached, children under five years of age often comprise a high percentage of communities near railroad tracks. The maximum decibel rating of each horn blast, the frequency thereof, and the duration thereof cannot be averaged, but should be examined in terms of cumulative impacts on sensitive populations.

Acute impacts from the proposals that should be addressed, in addition to cumulative impacts, include:

-Noise disturbance: The DEISs fail to quantify probable noise impacts from increased train traffic, and fail to examine the impacts on children's cognitive development, and overall sleep patterns, in communities already impacted by noise

-Particulate matter emissions from train engines: PM2.5 concentrations within a half mile of the tracks should be examined for existing baseline levels, and EJ communities compared with non EJ communities.

-Fugitive emissions of toxic vapors during transit: "crude shrinkage" can result in the loss of from .5 to 3% of the tank contents during transit (http://www.ci.benicia.ca.us/vertical/Sites/%7B3436CBED-6A58-4FEF-BFDF-5F9331215932%7D/uploads/NRDC_Comments_on_DEIR.pdf, https://rbnenergy.com/crude-loves-rock-n-rail-brent-wti-bakken-netbacks). Likely compounds include benzene, xylene, and toluene, along with other known carcinogens. Cancer risks in EJ communities, in particular areas of probable cancer clusters, should be evaluated for disproportionate impact.

-Fugitive emissions of toxic vapors during the offloading and onloading processes and during tank storage: Please find attached a summary of emissions concerns associated with the Bakersfield Crude Terminal in Bakersfield, California. Susceptible populations in proximity to the terminal should be examined for disproportionate risk of these emissions.

-Cumulative impacts of proposed oil and coal transport: The potential for a dramatic increase in fossil fuel transport by rail if all the proposed oil and coal facilities must be examined, as each type of train presents unique and cumulative harm. A recent study from the University of Washington monitoring coal trains has shown that the air pollution from coal trains is more egregious than previously understood. The abstract can be found here: http://www.sciencedirect.com/science/article/pii/S1309104215000057 The full article and supplemental video files can be found at: http://www.atmos.washington.edu/jaffegroup/modules/APOLLO/

Key findings from the report include that: 1.Coal trains emit nearly double the amount of air pollution compared to freight trains. The pollution is in the form of respirable (able to be breathed in) particles less than 2.5 microns in size, called PM2.5. 2. Every coal train polluted the atmosphere with coal dust. 3. One out of twenty coal trains emit visible plumes of coal dust, but this number increases with combined wind speed. One out of ten trains emits large visible plumes of coal pollution at combined wind speeds greater than 90 km/h For communities facing a combined increase of oil and coal trains, the cardiovascular and respiratory health impacts could be significant.

The cumulative impacts of emergency response should also be addressed. It is insufficient to analyze the impact of rail traffic on levels of emergency services provided to environmental justice communities; environmental justice communities already typically suffer from impaired emergency response. In addition to level of service impacts, the FEISs should analyze the total impact on an annual basis of degraded emergency response on human health. Acute conditions such as stroke and heart attack, and asthma attacks in children, demand rapid emergency response--to the extent that the proposals will degrade emergency response, each affected community should be made aware of those impacts through translated, accessible, culturally appropriate communication.

Response O11-3

Draft EIS Chapter 7, Section 7.2, *Social Policy*, includes an analysis of impacts on minority and low-income populations. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*, presents an analysis of noise impacts including noise from trains related to the proposed action. The analysis uses the Federal Railroad Administration (FRA) adopted noise assessment methods developed by the Federal Transit Administration (FTA). Per these methods, noise-sensitive land uses are identified within approximately 500 feet of the PS&P rail line for wayside noise and within 1,000 feet of grade crossings for train horn noise. No schools in the study area are within these distances. As noted in Section 3.7.6.2, *Proposed Action*, the loudest hour (measured in Leq) at grade crossings and wayside locations under the proposed action would result from a single train passby, which occurs under existing conditions. This means the maximum hourly noise levels would not change. Because freight rail traffic does not run on a schedule, the analysis assumes rail events related to the proposed action are evenly distributed over a 24-hour day. No moderate or severe impacts on sensitive receptors were identified for train wayside noise. The analysis identified moderate and severe noise impacts at residential receptors adjacent to grade crossings, due to the increase in horn noise events related to the proposed action over a 24-hour day. No moderate or severe impacts are predicted at schools. Section 3.7 identifies a proposed mitigation measure for the applicant to support local communities in applying for quiet zones at crossings where severe impacts from increased train horn soundings were identified. Where implemented, quiet zones would eliminate impacts. The EIS acknowledges that where quiet zones were not implemented at these crossings, the potential for severe impacts would remain.

Final EIS Chapter 3, Section 3.2, *Air*, presents updated estimates of emissions of criteria air pollutants (including PM2.5) to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The resulting rail emissions are lower. No violation of national ambient air quality standards is predicted from the proposed action.

Onsite emissions of air toxics are presented in Final EIS Appendix D, *Air Data*. As described in Draft EIS Chapter 3, Section 3.2, *Air*, potential impacts from onsite sources, with the exception of DPM which is described in the response below, were assessed using the methods outlined in the WAC 173-460-020 (Controls for New Sources of Toxic Pollutants). Based on air quality modeling for conducted by the applicant, all of the toxic air pollutants emitted from onsite stationary source operations would be either under their respective SQER or in compliance with their respective ASIL. Of the three toxic air pollutants that are above their SQERs—benzene, hydrogen sulfide, and nitrogen dioxide—all are within their ASILs. The highest is benzene at 39%, followed by hydrogen sulfide at 27.5% and nitrogen dioxide at 17.1% ASILs.

Refer to the Master Responses for Cumulative Impacts Analysis for information on the scope of that analysis.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Comment O11-4

Thresholds of pollution and impacts

In assessing the impacts of emissions from oil trains, the FEISs should consider whether or not specific geographic areas are in nonattainment for criteria pollutants, or would become so with the addition of these proposals. In particular, this analysis should investigate the impacts of increased rail traffic on PM 2.5 on proximate communities, with special attention given to environmental justice communities, or areas where rates of poverty and linguistic isolation are high and where a higher portion of the population are people of color. The Washington State Department of Health designates trains as a "major source" of diesel PM 2.5, regardless of its cargo. (http://www.doh.wa.gov/Portals/1/Documents/5500/EH-AQ2014.pdf) High levels of diesel PM 2.5 can increase risk of cancer, cardiovascular disease, reproductive and developmental disorders, and pulmonary diseases, among other health impacts for surrounding communities. (http://www.psr.org/chapters/oregon/assets/pdfs/or-and-wa-psr-position.pdf)

The impacts to threshold levels for PM 2.5 and other particulates associated with the transportation of oil by rail in these communities should be investigated in this study. If the increase in rail traffic is shown to increase PM 2.5 enough to exceed existing thresholds, the affected communities must be notified and consulted. For communities along rail routes that could also include coal transport, the combined effects of coal and oil trains should be considered in calculation of this number and notification of these communities.

Response O11-4

As presented in Draft EIS Chapter 3, Section 3.2, *Air*, criteria air pollutants resulting from the proposed action are not anticipated to approach levels defined by the National Ambient Air Quality Standards in the study area. As presented in Draft EIS Chapter 6, Section 6.5.1, *Air*, with the cumulative projects, there is a potential for a slight exceedance of the 1-hour NO_2 standard near the project site, if all three projects were performing certain activities simultaneously. Mitigation measures proposed in Section 3.2 and Section 6.5.1 would reduce potential impacts.

As presented in Draft EIS Chapter 3, Section 3.2, *Air*, all of the toxic air pollutants emitted from onsite stationary source operations would comply with the Washington toxic air pollutant program pursuant to WAC 173-460. The dominant air toxic emissions from rail transport are diesel particulate emissions from the burning of diesel fuel. Air dispersion modeling of diesel particulate emissions was conducted for the portion of the segment of the PS&P rail line (between Poynor Yard and the project site) where emissions would be the highest because of rail switching and unloading activities. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. Based on this modeling, the incremental increase in cancer risk from these emissions would be less than 10 in 1 million for any offsite receptor. This level of increased risk is not considered significant. Concentrations along the remainder of the PS&P rail line and related risk would be lower.

Table 3.2-7 presents annual emissions of criteria air pollutants emitted in Gray Harbor County under the proposed action, including those from rail transport, compared to related 2011 Gray Harbor County emissions. The table in the Final EIS reflects lower emissions from rail transport due to the revised assumptions for rail operations described above.

Draft EIS Chapter 7, Section 7.2, *Social Policy*, includes an analysis of impacts on minority and low-income populations. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O11-5

Incorporating tribal input

Along the length of the rail routes from the Bakken oil fields or the Athabascan tar sands to these proposals, dozens of indigenous tribes' hunting and fishing rights could be impacted by oil train accidents and obstruction of access to rivers and hunting grounds. With millennia of traditional access to fish and wildlife for subsistence harvest, any further degradation of fishing and hunting rights by new industrial projects must be taken into account.

The economic interests of sovereign tribal entities can be directly impacted by traffic concerns along the I-5 corridor caused by off ramp obstructions by increased train traffic, and by obstructing traditional access to the Columbia River. The Department of Ecology and City of Hoquiam as the responsible agencies must consult with all impacted tribes, both as sovereign nations and through organizations such as the Northwest Treaty Tribes (Northwest Indian Fisheries Commission) and the Columbia River Inter-Tribal Fish Commission, to discover the impacts of increased oil train traffic on their nations.

Similarly to the train traffic, the combined and cumulative harm that could come to fisheries from both oil and coal transport along Northwest waterways such as the Columbia River should be considered. BNSF has stated that coal accumulation on train tracks can contribute to derailments.

Response O11-5

Refer to the Master Response for Geographic Scope of the EIS.

Comment O11-6

Incorporating input from language isolated communities

English is often not the first language in EJ communities. In assessing impacts on communities along the rail route, Ecology and Hoquiam should take into account the high concentrations of non-native speakers of English in many communities, with special attention to indigenous peoples, Spanish speakers, and members of Asian Pacific Islander communities.

Case Study

As a case study, OneAmerica, Washington State's largest immigrant advocacy organization, has begun interviewing members of the Latino community in Vancouver, Washington about the threats of the proposed Tesoro-Savage Vancouver Energy Terminal to their health and livelihoods. The majority of their concerns focus on the potential impacts of increased rail traffic to their health, as many of them live in close proximity to the railroad. Because we can anticipate increased rail traffic with the construction of these terminals, these community concerns are relevant here as well. “Erika” (full name not disclosed in this letter) is a representative example of a resident of Fruit Valley.

Erika is a resident of Fruit Valley, a neighborhood that encompasses the Port of Vancouver and would therefore be home to the proposed terminal. Residents of this neighborhood are twice as likely to be foreign-born and more than three times as likely to have limited English proficiency as residents of Vancouver as a whole. Nearly half of Fruit Valley's population lives below the poverty level, compared to 18.7% of Vancouver residents in general, suggesting that these communities face economic and cultural barriers to health care and other resources that would be necessary to protect themselves from chronic negative impacts to air quality or to respond in the event of an oil spill or explosion. ("Fruit Valley Neighborhood in Vancouver, WA." City-Data. http://www.city-data.com/neighborhood/Fruit-Valley-Vancouver-WA.html. Accessed 10/01/2015.)

In a conversation with OneAmerica organizer Glicerio Zurita-Pinacho about her concerns, Erika cited the would-be terminal's proximity to flammable gas stations. She also pointed out that in her neighborhood, noise pollution from existing rail traffic is already a major problem and is worried about how increased traffic would worsen the stress associated with frequent noise. She conveyed her fears that increased rail traffic will especially threaten people with existing health conditions, saying, "I have a kid with lung problems, [and] it will bring more pollution and health concerns."

Nationally, hospitalization for asthma is nearly twice as common among Hispanic children as white children.("Children's Environmental Health Disparities: Hispanic and Latino American Children and Asthma." Environmental Protection Agency. http://www2.epa.gov/sites/production/files/2014-05/documents/hd_hispanic_asthma.pdf Accessed 10/01/2015) Hospitalization for asthma is often caused by elevated levels of particulate matter, including the diesel PM2.5 emitted by locomotive engines. (Adar, S. D., Filigrana, P. A., Clements, N., & Peel, J. L. (2014). Ambient Coarse Particulate Matter and Human Health: A Systematic Review and Meta-Analysis. Current Environmental Health Reports, 1(3), 258-274. http://doi.org/10.1007/s40572-014-0022-z)

Erika also noted the false economic promises of this type of development, saying, "The jobs proposed by the companies are only for documented people and people who have some type of career." The minimal development that Tesoro-Savage promises, in other words, will not help the communities who need it most.

Erika's story speaks to the need for a robust and thorough investigation of potential adverse impacts to public health vis-à-vis the transportation of crude oil by rail through Washington State. The profile of the Fruit Valley community in particular exposes the dangers of an assessment that uses the blunt instrument of averaging health impacts over time or across broad geographic regions, as averages can obscure the disproportionate - and potentially discriminatory - impacts to specific communities. And these impacts are not unique to Fruit Valley--they may, in fact, be replicated in each of the communities described below.

Response O11-6

Draft EIS Chapter 7, Section 7.2, *Social Policy*, includes an analysis of impacts on minority and low-income populations. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O11-7

Maps and Data

The maps and charts attached show the disproportionate impacts on EJ communities near the routes that oil trains en route to the proposals would travel. Demographic data was acquired from the Environmental Protection Agency's EJSCREEN data set. The impact zone for potential issues associated with oil train traffic was set to a one mile buffer on each side of the tracks.

A 1,600 meter (one mile) buffer was used on each side of the tracks to select EJ communities. Federal emergency responders advise evacuating 800 meters in case of a derailment of oil tanker cars, with an additional 800 meters (for a total of one mile) if more than one of the cars are on fire or if the tank cars contain compressed gas (as some Bakken crude has been shown to have). A derailment and explosion of multiple cars carrying Bakken crude has the potential for a much wider area of damage than shown by the one mile blast zone, especially in a unit train carrying nothing but oil tanker cars. Further, fugitive emissions, noise impacts, and traffic all have the potential for causing impacts well beyond the one mile threshold.

The places depicted in the maps and charts attached as PDFs fall into two groups. One group consists of places where the entire municipality or place consists of vulnerable populations concentrated near the tracks. The second group shows places where the municipality's most vulnerable residents are concentrated near the tracks compared to more privileged residents, and hence disproportionately impacted by any increase in pollution from the proposals. As decisions are made about revising the DEISs for these proposals, these and other disproportionately impacted communities must be considered as a part of any EJ analysis or SEPA option for health impact assessment.

Thank you for your attention to this critical issue.

Matt Krogh, Extreme Oil Campaign Director (author contact at mattkrogh@forestethics.org) ForestEthics

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Laura Skelton, Executive Director Washington Physicians for Social Responsibility

Margie Van Cleve, Chapter Chair Sierra Club Washington Chair

Response O11-7

Draft EIS Chapter 7, Section 7.2, *Social Policy*, includes an analysis of impacts on minority and low-income populations. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

O12, Friends of Grays Harbor, Arthur Grunbaum

Comment O12-1

Friends of Gray Harbor

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November 25, 2015

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In Re: Westway/Imperium Draft Environmental Impact Statements Volumes I - III

Thank you for this opportunity to review and comment on the above referenced study dated August 2015. We hope our input will be of assistance in making decisions that will benefit the economy, environment, visitors and residents of this important watershed. We incorporate by reference comments of concern submitted by but not limited to, the Washington Environmental Council, Climate Solutions, Friends of the Earth, Sierra Club, Forest Ethics, Washington Dungeness Crab Fisherman's Association, Grays Harbor Audubon, Physicians for Social Responsibility (Washington, Oregon Chapters), Grays Harbor/Willapa Oystergrowers Association, Washington State Council of Fire Fighters, 350.Org, Seattle, The Lands Council, Seattle Rising Tide, Evergreen Islands, Inc., Landowners & Citizens for a Safe Community, Everett Shorelines Coalition, Joseph Wartmann, Ph.D.,

P.E., Dan Leahy, Fred Felleman, Darryl Tinnerstet, David & Kay Seiler, the Figlar-Barnes, Robin Moore, Arnie Martin, Brady Engvall and the Quinault Indian Nation.

FOGH is a broad-based 100% volunteer tax-exempt 501(c)(3) citizens group made up of crabbers, fishers, oyster growers and caring citizens. The mission of FOGH is to foster and promote the economic, biological, and social uniqueness of Washington's estuaries and ocean coastal environments. The goal of FOGH is to protect the natural environment, human health and safety in Grays Harbor and vicinity through science, advocacy, law, activism and empowerment.

Our comments are applicable to both Westway and Imperium.

1. We are concerned that the 3,649 pages DEIS document is an ill-written apology paper which under reports and underestimates the impacts to the immediate project area and is woefully inadequate in its recognition of the impacts to the broader region.

Response O12-1

Comment acknowledged.

Comment O12-2

2. We are concerned that the availability of printed copies of the two DEIS's were not readily available to much of the affected populations. For example, there were no copies available at the Westport Library, despite the fact that significant Westport residents and businesses would be adversely impacted by the projects should they go forward. A search of the Timberland library system found only the availability of 1 CD and 1 printed copy set at the Hoquiam Library.

Response O12-2

Printed copies of the Draft EIS were available for review at the following public libraries.

- Aberdeen Timberland Library, Aberdeen
- Centralia Timberland Library, Centralia
- Hoquiam Timberland Library, Hoquiam
- Lacey Timberland Library, Lacey
- Olympia Timberland Library, Olympia
- McCleary Timberland Library, McCleary
- Ocean Shores Public Library, Ocean Shores

In addition, during the public comment period, the Draft EIS was available for viewing and download on the Washington State Department of Ecology's website (http://www.ecy.wa.gov/geographic/graysharbor/terminals.html), CDs of the Draft EIS were available at the public hearings, and printed copies are available upon request at cost as stated in the public notice of availability.

Comment O12-3

3. We are concerned that the DEIS as presented apparently recommends and believes that the staffing of 30.2 FTE employees with a tax-supported budget of $11,527,000 can solve and

mitigate the potential loss of livelihood of approximately 31% of the Grays Harbor workforce and 36% of the Pacific County workforce who depend on healthy marine resource jobs—a figure which excludes tribal contributions.

Response O12-3

Comment acknowledged.

Comment O12-4

4. These proposals are located in a tsunami and liquefaction zone with a 65% chance of a 6.0 or greater earthquake. Spills, accidents or catastrophic occurrences will happen within the life expectancy of these proposals. A Cascadia Subsidence would drop the landform and surrounding area by 2 meters or roughly 6-1/2 feet and would instantly place approximately 113,000,000 gallons of crude oil at or below sea level. This was not adequately addressed in the DEIS.

Response O12-4

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards,* describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to Draft EIS Appendix C, *Tsunami Impact Modeling Assessment*, for information about the assumptions used in the analysis. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment O12-5

5. We are concerned that the DEIS inadequately considers Governor Inslee's Executive Order 14- which shows concern about sea level rise and ocean acidification. Although RCW 70.235.020 began the process of inventorying the State's greenhouse gas (GHG) contributions and projections, the DEIS did not discuss nor review the proposed coal and crude oil terminals and their operations' contribution to Washington's GHG. These projects programmatically should have been studied using both a consumption-based approach and a production-based approach in order to capture the true impacts of these operations and their product at build-out and at maximum throughput. Separating the GHG contribution into sections and separate documents doesn't adequately show the cumulative impacts. The three Grays Harbor projects and the Vancouver projects alone would increase the State's footprint by 185.5%.

Response O12-5

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts,* presents estimates of greenhouse gas emissions from onsite operations and offsite transport of the cumulative projects based maximum annual throughput. The Final EIS section has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination and revised assumptions for rail operations along the PS&P rail line. Refer to the Master Responses for Geographic Scope of the EIS, Similar or Connected Actions, and Crude Oil Extraction, Transport, and Combustion.

Comment O12-6

6. A spill in one of our fast-moving waterways presents a great challenge when a water-in-oil emulsion ("mousse") occurs as a result of high-energy mixing. The resulting mousse has properties that prevent dispersion into the water column and clean up becomes ineffective, if not impossible. There is no mitigation possible for this eventuality, and the spill modeling was inadequate and unreliable.

Response O12-6

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including a discussion of the persistence of crude oil in the environment. Refer to the Master Response for Oil Spill Modeling Methods.

Comment O12-7

7. Treaty and non-treaty tribes, such as the Quinault Nation, Hoh, Jamestown S'Klallam, Lower Elwha Klallam, Quileute, Shoalwater Bay, and Makah tribes have lived and utilized the waters and lands of the Olympic Peninsula, Pacific Northwest Ocean, the estuaries of the Columbia River, Willapa Bay and Grays Harbor, for tens of generations. They depend on the delicate balance that nature provides to sustain their culture and subsistence. The natural flow of waters during flood events depends upon healthy and natural storage of wetlands and riparian areas. Any interruption of natural processes of air, earth and water only exacerbates problems elsewhere - usually downstream or elsewhere into the ocean and estuaries. Additionally, since the late 1800s, generations of non-native fishers, crabbers and shellfish gatherers have accessed the economic bounty of the coastal area. The further introduction of crude oil into these areas can only threaten to destroy these critical components of their combined cultures and heritage.

The DEIS fails to satisfactorily address this and the mitigation is completely inadequate and disrespectful.

Response O12-7

Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, describes tribal resources in the study area and potential impacts on those resources related to construction and routine operation of the proposed action.

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the potential impacts on tribal resources from an oil spill, fire, or explosion in the study area in general terms.

Refer to the Master Response for Geographic Scope of the EIS for information about geographic scope of the analysis. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O12-8

8. Environmental fate, effects, and transport of released crude oil, dispersed oil, and dispersants on human health and the environment should have been carefully documented and studied. Spills, explosions, fires, and blowouts can have multiple environmental and public health impacts, which should have been quantified and analyzed for their economic impacts. Operational discharges of produced water, drill cuttings, and mud, which remain as a residual of the crude product have chronic effects on benthic (bottom-dwelling) marine communities, mammals, birds, and humans. Humans can also be affected by occupational exposure to oil and other chemicals while participating in response and cleanup operations, or by environmental exposure such as ingesting oil-contaminated seafood.

Response O12-8

Draft EIS Chapter 4, Section 4.2.2.2, *Northwest Area Contingency Plan*, describes the planning framework in place for Washington State and discusses the factors considered when planning and implementing a response effort. The Regional Response Team is responsible for the Northwest Area Contingency Plan development that includes the consideration of dispersants or *in situ* burning.

The approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms including the concerns identified in the comment. Final EIS Section 4.7 has been revised to more fully describe potential impacts on human health.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills. For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O12-9

9. Marine mammals are affected by the oiling of their fur and skin, and through consumption of oil-contaminated foods (e.g., mussels, clams and oysters), or via inhalation of fumes that have liver,

kidney, and central nervous system toxicity. The marine mammals most commonly affected include seals, sea otters, sea lions and whales. Sea otters are particularly vulnerable as they feed near the surface, have little blubber, and depend upon an intact fur coat to maintain their body temperature. An oil spill in Grays Harbor similar to the Nestucca, which spread from Grays Harbor to Vancouver Island on the north and ended up in Newport, Oregon to the south, would potentially wipe out the existence of sea otters off the coast of Washington. The DEIS failed to research and understand these impacts and how to mitigate the effects of an oil spill before it has affected the species at risk, including humans. Ecotoxicity research should have been presented in areas beyond human health effects, including research about effects on animals and other aspects of the environment.

Response O12-9

The potential impacts associated with exposure to crude oil are described in Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, consistent with the scenario-based approach discussed in the Master Response for Environmental Health and Safety Analysis.

Comment O12-10

10. The DEIS incorrectly states that whales are not present in the estuary or near the coast. This is incorrect and impacts to and from whale collisions should be analyzed.

Response O12-10

Final EIS Chapter 3, Section 3.5, *Animals*, reflects additional information to address whale use of Grays Harbor, including frequent use by the gray whale. The vessel impact mechanisms described in Draft EIS Section 3.5 remain the same, but the Final EIS section clarifies that marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a greater risk from vessel strikes. As described in Section 3.5, the likelihood of vessel strikes and the potential for population-level impacts would be low; therefore, potential impacts are not considered significant.

Comment O12-11

11. The safe transportation of crude oil is complicated by the varied nature of the product itself. Bakken crude oil is inherently volatile with a flash point at or under 74° F and a vapor pressure similar to gasoline. An additional and serious danger is often the amount of dissolved natural gas and volatile organic compounds within the crude. This gas affects the vapor pressure of the crude. When contained in tank cars or other vessels, the vessel itself can become highly pressurized, almost like a soda can. The vapor pressure of a liquid, which varies with temperature, is a measure of how much vapor the liquid releases during evaporation. Materials with high vapor pressures tend to burn more violently because the liquid can change into vapor more readily, feeding a fire. The classification and packaging of crude oil does not currently account for vapor pressure. This was inadequately addressed in the DEIS.

Response O12-11

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for

Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods. The analysis does not result in any new or substantially different impacts compared to those presented in the Draft EIS.

Comment O12-12

12. While the spike in Bakken crude oil has focused attention on the transportation of crude oil into Washington, there is also a concern over the probability of transporting Canadian Tar Sands crude oil through the state. Canadian Tar Sands oil presents a different set of challenges to effective prevention and response. Tar Sand oil is less volatile than Bakken crude oil, but can become heavier than water and will sink to the bottom of any waterway particularly after volatile diluents have evaporated. If transported through Washington State, the Canadian tar sands crude oil would travel along, or on many of the state's major waterways, including the salmon-critical Columbia and Chehalis Rivers. Leaving the city of Centralia it would pass over 100 rivers, tributaries and streams on its way to Hoquiam. Since Tar Sand oil sinks when introduced to water, different spill response equipment and protocols would be needed. The Bakken Crude also was been shown to sink and persist as we learned from the tragic Lac Megantic disaster. The DEIS fails to acknowledge that both Imperium and Westway have been approached by producers who are interested in the storage and shipment of tars sands or dilbit to foreign export markets.

Response O12-12

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. A new mitigation measure has also been added to Sections 4.4.3, 4.5.3, and 4.6.3 for the applicant to ensure access to specific response equipment through agreements or contracts to improve recovery in the case of a spill of crude oil that weathers, sinks, or submerges. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

Comment O12-13

13. The Northwest Area Contingency Plan (NWACP) administered by EPA Region 10 and the U.S. Coast Guard (USCG) recently has begun its 2015 update. The NWACP also provides guidance on issues such as identifying sensitive areas and the size of the response organization that may be required. Content of the NWACP is identified in the Clean Water Act (CWA). The National Oceanographic and Atmospheric Administration (NOAA) administers the Environmental Sensitivity Index (ESI). As with the NWACP, the ESI covering the Columbia and Chehalis River is inadequate and needs to be updated to account for the increased dangers of crude oil transportation by tanker, barge and/or railroad. Neither the NWACP nor the ESI was discussed or addressed in the DEIS.

Response O12-13

Draft EIS Chapter 4, Section 4.2.2, *What framework prepares for an incident*? describes the formalized planning framework in place to address risks related to oil spills, fires, and explosions. This section discusses the Northwest Area Contingency Plan and site-specific geographic response plans relevant to the study area. The contingency plan was updated in January 2016 and will continue to undergo periodic updates as conditions on the ground and external factors change. The GRPs are updated periodically based on ongoing tests, during drills and real events, of the strategies contained in the plans. The Environmental Sensitivity Index is published and maintained by NOAA to identify coastal resources at risk from an oil spill. It is not within the scope of this EIS to update the response plans or Environmental Sensitivity Index. Refer to the Master Response for the Purpose and Focus of the EIS.

Comment O12-14

14. Rail conditions coming from Centralia to Hoquiam are completely inadequate to handle oil trains, and has been shown by the recent derailments of grain trains, that it may not be adequate to handle any heavy load commodity. A detailed study of the conditions of the bed, ties, rails, crossings and bridges must be undertaken and quantified. The DEIS fails to do this.

15. Financial responsibility must be determined before any crude oil is transported. These items were mentioned in the DEIS, but no analysis was done to quantify this nor was there a discussion of the impacts should repairs not be implemented prior to the shipping of crude. Since the DEIS admits that there is no funding for the repairs, a study should have been made which would have quantified the risks and costs attributable to an accident or disaster.

Response O12-14

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Additionally, a new mitigation measure has been added to Section 4.5.3 for the applicant to accept crude oil at the proposed facility only once PS&P verifies track integrity based on an evaluation of load limits.

As described in the Master Response for Environmental Health and Safety Analysis, the impacts analysis in the Draft EIS focuses on the risks of a set of spill scenarios rather than predicting where a specific incident of a certain type may be more likely. Because the analysis is not a quantitative risk assessment, it does not include weightings for different factors except where they are explicitly captured in available data—such as the track class for rail operations or the type of waterway for vessel operations. As noted in the revisions to Final EIS Chapter 4, Section 4.2, *Applicable Regulations*, final rules promulgated by Ecology in August 2016 address the need for railroad operators to develop contingency plans and demonstrate financial responsibility prior to operations.

Comment O12-15

16. The DEIS fails to acknowledge the real risks of using DOT 111s and "improved" tank cars to transport crude oil. 6.5.7.4 on page 6-64 touts "Voluntary Measures". This omission is curious because even refineries are now admitting the glaring problems with these old cars. The BP refinery at Cherry Point, Washington recently announced that it would ban DOT 111s and require all oil trains use newer, slightly safer cars.

Response O12-15

Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and the retrofitting of all existing tank cars in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 Federal Register 26643). However, as noted in Section 4.5.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport?* the risks cannot be eliminated.

Comment O12-16

The draft study ignores potential routes these trains could take to minimize exposure to population centers, wild places, and critical drinking water supplies.

Response O12-16

There are no alternative rail routes in the study area to Grays Harbor. As noted in Final EIS Chapter 5, *Extended Rail and Vessel Transport*, BNSF has not selected the route for the movement of crude oil by rail; however, the most likely route is described in Chapter 5 and is analyzed in the Draft EIS.

Comment O12-17

The risk and cost of responding to emergencies are left in the hands of local firefighters and the public.

Response O12-17

Final EIS Chapter 4, Section 4.2.3, *What framework provides responses to an incident*? has been updated to better reflect existing local response capabilities and resources in the study area. Section 4.7, *Impacts on Resources*, has been updated to better reflect what the potential impacts on local emergency service responses would be as the result of the proposed action.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment O12-18

According to the NTSB, "carriers have effectively placed the burden of remediating the environmental consequences of an accident on local communities along their routes."

17. The DEIS doesn't identify insurance coverage for these trains, but rather talks about flood, fire and life insurance. This leaves important questions unanswered: Is it even possible for an oil shipper to get the coverage it needs for worst-case scenarios? What assurance is there that the companies involved will not declare bankruptcy?

Response O12-18

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

As noted in Final EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*, WAC 480-62, Railroad Companies—Operations, was finalized in February 2016. This new rule requires railroad companies to carry insurance that covers any losses resulting from a reasonable worst-case spill. The reasonable worst-case spill for the PS&P rail line is 17.75 cars.

Comment O12-19

18. The disaster in Lac Megantic in Quebec that killed 47 people demonstrates the extent of the threat. The DEIS fails completely in addressing this danger.

Response O12-19

Final EIS Section 4.7, *Impacts on Resources*, has been revised to more fully describe potential impacts on human health.

Comment O12-20

19. The DEIS barely touches on threats to Tribes, for example, the potential damage to traditional fishing areas from a spill into the Chehalis River and Grays Harbor. This is especially surprising because the Quinault Nation is engaged in a legal battle against the Grays Harbor terminal proposals. The report also ignores the concerns of the Makah, Lummi, and Tulalip Tribes.

Response O12-20

Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, describes tribal resources in the study area and potential impacts on those resources related to construction and routine operation of the proposed action.

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the potential impacts on tribal resources from an oil spill, fire, or explosion in the study area in general terms.

Refer to the Master Response for Geographic Scope of the EIS for information about geographic scope of the analysis.

Comment O12-21

20. There is also a glaring absence to address the concerns of the Washington Dungeness Crab Fishermen's Association, Coalition of Coastal Fisheries, Westport Charterboat Association and

the Willapa/Grays Harbor Oysterman's Association. We object to the exclusion of scoping comments by the marine industries and the Quinault Indian Nation in the DEIS.

Response O12-21

The co-leads reviewed and considered all scoping comments. Final EIS Appendix A, *Scoping Comments*, provides a catalog of all comments received during the formal scoping period.

Comment O12-22

21. We encourage the incorporation into the FEIS, the statement made in Appendix C, PDF page 103 of the Marine and Rail Transportation Study: "Oil spills can threaten some of Washington's most productive and valuable ecosystems. All spills can threaten public health, safety, the environment, and ultimately damage the state's economy and quality of life. Almost 2,500 miles of major rivers in Washington run within 1,000 feet of a rail line. An incident involving oil transported by rail in bulk could adversely and significantly impact the natural resources and economic health of the state. Oil spills of any size, depending on product type and location, threaten productive and valuable ecosystems, killing birds and marine life, contaminating beaches, shellfish, and groundwater. Spilled oil poses serious threats to fresh water and marine environments. It affects surface resources and a wide range of subsurface organisms that are linked in a complex food chain that includes human food resources. Significant oil spills can cause millions of dollars in damage to important industries, including shellfish production, fishing, tourism, and recreation".

Response O12-22

Comment acknowledged.

Comment O12-23

22. Seismic and wind design requirements do not provide adequate protection to fuel storage containers during tsunami events. Earthquake induced damage can be characterized by elephant foot or diamond bucking of the base of the container, anchorage failures, base sliding, and sloshing damage to the upper shell and roof [Malhorta, Wenk, and Weiland 2000]. Damage to fuel storage tanks during the 2004 Indian Ocean Tsunami were observed by Goto [Goto 2005]. He discovered instances of failure due to sliding, floating, and buckling. Page 2 Tsunami Impact on Fuel Storage Containers - Hillary Brooker Lehigh University, Project PI: Clay Naito Lehigh University August 2011. (Clarify these references)This has not been covered nor mitigated.

Response O12-23

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards,* describes geologic conditions that could affect the project site, including earthquakes and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards,* describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment O12-24

23. We are concerned about the lack of consistency throughout the DEIS on impacts. Statements are contradictory and misleading. For example, among countless others:

    (S-28) "Although the total number of minutes each day that grade crossings would be blocked along the PS&P rail line would increase, trains associated with the cumulative projects could be accommodated on the PS&P rail line with existing infrastructure and there would be no cumulative impacts on rail traffic

    (S-35) "Because the cumulative projects, including the proposed action, would have unavoidable and significant adverse environmental impacts on noise, tribal resource, vehicle traffic, and environmental health and safety, the proposed action would contribute to unavoidable and significant adverse environmental cumulative impacts on these resources."

Response O12-24

The first statement referenced by the commenter is about impacts on rail traffic; the second statement is about impacts on the other resources listed.

Comment O12-25

24. We are concerned that environmental damage related to a tsunami event will be evidently be conducted after the permits are issued. This needs to be done prior to permitting.

    (S-37) "To reduce the potential for environmental damage related to a tsunami event, the applicant will conduct a study to assess the technical feasibility and cost of implementing measures to construct the proposed facilities to withstand a Cascadia Subduction Zone (CSZ) L1 tsunami wave based on the Scenario 2 inputs listed in Table 3 of the Tsunami Impact Modeling and Analysis (Appendix C of this Draft EIS). Agreed upon measures will be implemented prior to project design and construction in coordination with the co-lead agencies."

Response O12-25

Draft EIS Chapter 3, Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* acknowledges that a large-scale tsunami would cause unavoidable and significant adverse impacts if the facility was not constructed to withstand it. Refer to the Master Responses for Seismic Risk and Design Requirements and Mitigation Framework.

Comment O12-26

25. The DEIS inadequately assessed the impact of earthquakes. Earthquakes impact areas hundreds and even thousands of miles away from the fault and are predicted to occur much more frequently than claimed in the DEIS. Recent seafloor core samples measuring Cascadia Subduction suggests that there are dangerous rupturing every 250 years. Our last recorded CSZ quake was 315 years ago in 1700. It appears that a major event may be over-due. To make the following statements make no sense: (3.1-12). "The Grays Harbor Fault Zone, located on the sea floor, is the closest fault to the study area. It begins approximately 1 mile offshore to the west of Ocean Shores and runs east-west for approximately 13 miles. This fault has an estimated most recent event of less than 1,500 years ago (Lidke et al. 2003). The seaward edge of the CSZ is

about 120 miles to the west of Hoquiam. Because there are no active surface faults located in the study area, the potential for impacts related to surface fault rupture are not discussed further."

Response O12-26

The 50-kilometer radius basis for earthquake probabilities in the study area presented in Table 3.1-2, in Draft EIS Chapter 3, Section 3.1, *Earth*, is a function of the tool presented for public use by the U.S. Geological Survey. While earthquakes of similar magnitudes could occur at distances greater than 50 kilometers, the intensity at the project site would reduce with distance from the epicenter. The Draft EIS considers the impacts related to a large earthquake, and smaller events are considered by inclusion in the consideration of the larger and more intense seismic event. Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment O12-27

26. The DEIS incorrectly states that the first tsunami wave would reach Hoquiam in 1 hour." (3.1-14). However the Grays Harbor County Tsunami Warning Plan (2006) discusses "Local Tsunami" and "Distant Tsunami" events. "A LOCAL TSUNAMI" could come onshore within 15 to 20 minutes after an earthquake,..." (GHCTW, page 4). Modeling and analysis for a local event, which gives employees 15 minutes to exercise shutdown procedures and assure that they have adequate time to safe retreat was not included. The likelihood of a Local Tsunami event is more frequent.

Response O12-27

Draft EIS Chapter 3, Section 3.1, *Earth*, addresses the impacts of a tsunamis resulting from a Cascadia Subduction Zone event. Based on the model used to develop the hazard maps for Washington State, the first tsunami wave would reach Hoquiam in 1 hour (Walsh et al. 2000, as cited in the Draft EIS). As stated in Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, since the publication of the state's hazard mapping in 2000, recent tsunami events and advancements in the understanding and methods applied to tsunami modeling have provided for refinement of these estimates. To further inform the risk of tsunamis in the study area, an updated tsunami model was completed (Appendix C, *Tsunami Impact Modeling and Analysis*). The analysis estimated that the tsunami wave would arrive approximately at 3,200 seconds (53 minutes) past the earthquake and tsunami wave generation.

Comment O12-28

27. The discussion of rail traffic impacts is woefully inadequate. The DEIS states that future improvements on the track were included in the simulation, but are "not funded or programmed for implementation." (3.15-7,8) Why were improvements included in the analysis if they are not funded? What will happen if the improvements aren't funded? All discussion of rail traffic and impacts are based on infrastructure improvement that is speculation.

Response O12-28

Refer to the Master Response for Baseline and No-Action Alternative.

Comment O12-29

28. The DEIS study on rail line capacity was for 10 trains/day not 12, yet the claim is that the rail line can handle 12 trains/day. What is that statement based upon?

Response O12-29

As stated in Draft EIS Chapter 3, Section 3.15.4.7, *Current PS&P Rail Line Capacity and Operations,* the rail modeling analysis indicated that the PS&P rail line has a capacity of 12 train trips per day. This capacity was used to identify potential impacts of the proposed action on rail transportation in Section 3.15, *Rail Traffic*. The rail modeling assumptions and creation of stringlines to calculate daily individual train trips are described in Draft EIS Appendix K, *Rail Traffic Technical Information* (Section K.2).

Comment O12-30

29. Tracks cross 55 bridges that were built over 100 years ago. What is being done to rebuild them? The PS&P line between the BNSF main line in Centralia (MP 0.0) and its terminus in Hoquiam (MP72.6) has 55 rail bridges (including box culverts). There are 52 rail bridges (including box culverts) between Centralia and the project site. All bridges cross waterways (sloughs, rivers, creeks, or intermittent streams). The larger waterway crossings on the PS&P rail line are as follows. Skookumchuck River (MP 1.68); Black River (MP 12.64); Satsop River (MP 52.43); Wynoochee River (MP 59.00); Chehalis River (MP 66.25); Wishkah River (MP 68.24)"(Page 3.5-10). Repair of these structurally deficient crossings would be significant and would fall on the general public to fund them. How was the cost benefit of these upgrades factored into the required Hoquiam analysis? How has this been factored into the Grays Harbor County and local cities budgets?

Response O12-30

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant. Improvements required by applicable regulations or based on inspection results, including bridges, would be privately funded by PS&P.

Comment O12-31

30. Section 3.16.8 on proposed rail traffic unavoidable and significant impacts does not adequately discuss impacts leading to the areas studied. It also does not quantify costs or from where the funds would be obtained, nor the time frame that would be required to achieve the mitigation.

Response O12-31

Final EIS Chapter 3, Section 3.16.8, *Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?* clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).Refer to the Master Response for Mitigation Framework for an explanation of how mitigation measures were identified and how they would be implemented.

Comment O12-32

31. Spill size and release probabilities (4.2.1) are unrealistic and suspect of inaccuracy of scale. There is no discussion as to whether these figures were averaged over several years. Prior to 2013, there were relatively few shipments and storage of crude oil in the United States compared to what is occurring now, which would skew the probabilities.

Response O12-32

Refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment O12-33

32. (Table 5-1, Figure 5-2 Crude Oil Imports) These graphics are misleading and do NOT accurately describe the impacts to our region. Grays Harbor has 0 imports of crude oil. If the study area is restricted, then graphics and rhetoric about crude oil, its movement and impact cannot be minimized by comparing to the whole.

Response O12-33

DEIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts of rail and vessel transport beyond the study area analyzed in Chapter 3, *Affected Environment, Impacts, and Mitigation,* and Chapter 4, *Environmental Health and Safety*. The referenced figures are intended to provide context for the discussion of potential impacts of the proposed action in this broader area.

Comment O12-34

33. Discussion of impacts to communities is inadequate. Since impacts to communities along the rail corridor from Williston to Hoquiam weren't considered, neither should actions by BNSF along their rail line. (5.4.3.1) (5-7)

Response O12-34

Refer to the Master Response for Geographic Scope of the EIS.

Comment O12-35

34. What are the planned infrastructure improvements to the Wishkah Bridge, when will they happen and how will they be funded? Is the funding secure? (6-36)

Response O12-35

PS&P improvements would depend on future rail traffic and are subject to change. Any future improvements to the rail line because of compliance with applicable federal regulations or based on inspection reports would be would be privately funded by PS&P.

Comment O12-36

35. The DEIS is inaccurate by claiming there are no water quality problems. The Grays Harbor Estuary is under an ongoing TMDL and has been on the EPA's 303d list for dissolved oxygen.

Response O12-36

The water quality information in the Draft EIS is based on the latest Washington State Department of Ecology and U.S. Environmental Protection Agency (EPA) water quality information reported under Clean Water Act Section 303(d). Based on the current EPA-approved 2012 assessment of impaired waters in Washington State, no area of Grays Harbor is listed as being impaired for oxygen (Category 5 water) or impaired and undergoing a total maximum daily load (TMDL) for dissolved oxygen (Category 4 water). Washington State Department of Ecology sent the proposed 2014 list of impaired waters in Washington State to EPA in 2015, and approval is still pending. However, a review of the 2014 proposed impaired water body listings shows that dissolved oxygen is not impaired for any part of Grays Harbor (Category 5 or Category 4).

The only established TMDLs for Grays Harbor and its tributaries in Water Resource Inventory Area (WRIA) 22 are for fecal coliform bacteria and dioxin. There are temperature TMDLs for the Upper Humptulips River and Simpson Timberlands but those do not affect Grays Harbor. While no Category 5 listings are present for dissolved oxygen or temperature, there are Category 2 listings for these parameters. Category 2 means "Waters of Concern," where the data points to a pollution problem but are not sufficient to list the water body as impaired (Category 5).

Comment O12-37

36. There is no discussion of the important organic dairy and other farms that are located along the rail corridor. There is no impact mentioned or studied. The increase of rail traffic to milk production and the potential for adverse effects to herd health in case of a spill, were not studied. (Table 3.7-2)

Response O12-37

The approach to the risk assessment is to describe the risks associated with selected spill scenarios and the potential impacts are discussed in Draft EIS Chapter 4, Section 4.7, *Impacts on Resources,* in general terms, including the potential to affect land resources and animals.

Comment O12-38

37. The proximity of schools, hospitals, health care facilities and first responders was not indicated or enumerated.

Response O12-38

The approach to the risk assessment is to describe the risks associated with selected spill scenarios, and the potential impacts are discussed in Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, in general terms, including the potential to affect land resources, human health, and public services, including first responders. Final EIS Chapter 4, Section 4.5.3 includes a new mitigation measure for the applicant to fund development of a geographic information system (GIS) layer that identifies critical facilities near the facility and along the PS&P line. The facilities will include schools, hospitals, community centers, and parks within 0.5 mile of the rail line. The GIS layer will be provided to the Local Emergency Planning Commission, local fire departments, and Ecology. The study will be submitted prior to beginning operations.

Comment O12-39

38. Job estimates are inconsistent throughout the document. For example, the section on traffic impacts of employees states that operation of the proposed action would result in an additional 50 employee trips per day for Westway (v. 3, L-12) and an additional 30 employee trips per day for Imperium (v.3, L-12). Both documents state, "It is assumed that for every one worker there would be one trip to and one trip from the project site." Therefore, there would be 25 additional employees at Westway and 15 additional employees at Imperium. This totals 40 new jobs for both projects. In Vol. 1, Chapter 7, Westway reports on page 7-7 that there will be 36 direct jobs for onsite operations, but on page 7-32, they report estimates of 15 direct operational jobs. In Vol. 1, Chapter 7, page 7-7, Imperium reports 103 direct jobs for onsite operations. On page 7-32, they estimate 20 direct operational jobs for Phase I and Phase II combined. There are other example of inconsistencies throughout the DEIS.

Response O12-39

Draft EIS Chapter 7, Section 7.1, *Economics*, is based on the Economic Impact Analysis (Draft EIS Appendix O) prepared by ECONorthwest for the applicant prior to the development of the Draft EIS. The 36 direct jobs cited by the commenter include those related to onsite operation of the proposed action and rail and vessel operations to and from the project site. As shown in Table 9 of Draft EIS Appendix O, 15 of the 36 estimated direct jobs are related to onsite operations. Chapter 3, Section 3.16, *Vehicle Traffic and Safety,* reflects updated estimates received from the applicant as part of the development of the Draft EIS. A citation has been added to the text in the Final EIS.

Comment O12-40

39. Tribal and cultural constitutional treaty rights and concerns have not been adequately addressed. This is a major deficiency. We incorporate by reference specific concerns as enumerated by the Quinault Indian Nation comments. They hold tribal treaty fishing rights and these cannot be interfered with or mitigated.

40. There is lack of analysis of the impact of crude by rail from Chehalis to Hoquiam on tribal fishing activities. The railway crosses over 100 salmon bearing rivers, tributaries and streams that feed into the Estuary and directly impact QIN and Chehalis tribal rights.

Response O12-40

Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, describes tribal resources in the study area and potential impacts on those resources related to construction and routine operation of the proposed action.

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the potential impacts on tribal resources from an oil spill, fire, or explosion in the study area in general terms.

Comment O12-41

41. There is a total inadequate analysis on impact of oil spills on razor clams, shellfish, economies of coastal communities as well as tribes.

Response O12-41

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, Final EIS Section 4.7 clarifies that there is the potential for impacts on commercial and recreational fisheries and that while impacts would depend on the circumstances of the incident, the resources described in Chapter 3 could be affected.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O12-42

42. Impacts to health and related issues are inadequately analyzed. In addition to diesel, toxic fumes, hazardous materials, there are mental health issues: fear of explosions, impacts of continuous noise, etc. There is no analysis of human health impacts in case of a spill or explosion. There is no analysis of the Poynor Yard, for example, and the impact on the employees and customers of Safeway groceries and nearby businesses and their employees and customers.

Response O12-42

The Draft EIS considers the following impacts related to human health. Final EIS sections have been revised, as noted below, to more fully describe these impacts.

- Chapter 3, Section 3.2, *Air*, describes potential impacts on air quality and the potential for increased cancer risk from emissions of diesel particulate matter related to construction and routine operation of the proposed action. The Final EIS section has been updated to reflect

revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analysis predicts lower emissions; the level of increased risk is not considered significant.

- Chapter 3, Section 3.7, *Noise*, describes potential impacts on sensitive receptors near the project site and transportation corridors from increased noise and vibration related to construction and routine operation of the proposed action.
- Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, describes potential impacts on public safety and emergency vehicle access from increased vehicle delay related to rail traffic from routine operation of the proposed action.
- Chapter 4, Section 4.7.1.7, *Human Health*, describes potential impacts of an oil spill on human health. The Final EIS section reflects a fuller description of these potential impacts.
- Chapter 4, Section 4.7.2.3, *Human Health,* describes potential impacts of a fire or explosion on human health. The Final EIS section reflects a fuller description of these potential impacts.

Comment O12-43

43. The modeling done of potential problems caused by or in association with an earthquake events was inadequate. It was not based on local and/or site specific data. The modeling didn't include tidal fluctuations nor rain and wind events, which seem to occur more often.

Response O12-43

The site-specific tsunami risk analysis in Draft EIS Appendix C, Tsunami Impact Modeling and Analysis, describes assumptions regarding tide levels during a tsunami. It assumes a tsunami would occur during high tide and includes a 1.3 safety factor to account for other considerations. Refer to the Master Response for Seismic Risk and Design Requirements.

Comment O12-44

44. The new storage tanks and related infrastructure carrying and storing crude oil could rupture in the event of a tsunami and expose people and the environment to increased harm. Tabletop exercises of the Grays Harbor Emergency Management Office have outlined potential dangers and outcomes of an earthquake experienced in the local area. These exercises indicate that power loss, infrastructure collapse and other quake-related impedances will severely inhibit emergency response. This was not adequately addressed in the DEIS.

Response O12-44

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards,* describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements. Final EIS Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* acknowledges that while the proposed facility may not be operational following the occurrence of a large seismic event, the storage tanks would be designed to contain materials until such time as they can be safely recovered and/or the facility returns to operational status. Final EIS Chapter 4,

Environmental Health and Safety, addresses emergency services response and acknowledges difficulties that could face, particularly local emergency responders. As noted in the Master Response for Environmental Health and Safety Analysis, the risk assessment considers the potential for various spill releases to occur regardless of the causal event.

Comment O12-45

45. For tsunami events, the DEIS states, "Agreed upon measures will be implemented prior to project design and construction in coordination with the co-lead agencies. (S-37). These studies and measures must be done before permits are given.

Response O12-45

Refer to the Master Response for Mitigation Framework.

Comment O12-46

46. There is no reference to research if sea level rise is higher than 3 feet. Therefore the statements ". . . no flooding from sea level rise is predicted at the project site." (S-27) is inaccurate.

Response O12-46

Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts, Climate Change*, and Final EIS *Summary* clarify predictions of sea level change in the study area and potential flooding at the project site. With sea level rise in the study area predicted to be 1.57 feet by 2050, the project site will remain approximately 5 feet higher than the projected high tide. As such, it would not be subject to flooding even during extreme storm events.

Comment O12-47

47. Section 6.5.7.2 Cumulative impacts on spills scenario is completely erroneous.

    (6-50 to 6-54). "The chance of a minor collision or derailment resulting in a minor spill from one rail car is predicted to be once in 29 years, with a slight reduction to once in 31 years for 2037. The chance of a collision or derailment resulting in a loss equivalent to one rail car is predicted to be once in 11 years, dropping to once in 13 years for 2037. The chance of a collision or derailment resulting in the loss equivalent to three rail cars is predicted to be lower, at once in 73 years for 2017 and once in 110 years for 2037. The chance of a collision or derailment resulting in a loss equivalent to the content of five rail cars is predicted to be lower, at once in 1,400 years for 2017 and once in 3,300 years for 2037. The chance of an extreme event involving a release from a large number of rail cars is predicted to be once in 22,000 years for 2017 and once in 44,000 years for 2037." It is difficult to understand how these statements can be made given that from July, 2013 to July 2015, there have been 14 derailments of crude oil trains in the US and Canada. In the month from mid-October to mid-November, there have been two crude oil derailments.

Response O12-47

The results of the risk assessment presented in Draft EIS Appendix M, *Risk Assessment Technical Report*, and summarized in Draft EIS Chapter 4, *Environmental Health and Safety*, are not directly

comparable to the risks present in the extended study area. The nationwide rail system is more than a 1,000 times the length of the PS&P rail line. By comparison, there are also a greater number of trains traveling each day. Thus, the likelihood of an incident occurring along any single segment of a railroad (e.g., the length of the PS&P rail line in the study area) would be less than the likelihood of an incident occurring on a longer portion of that railroad (e.g., the entire mainline railroad system). In addition, the Draft EIS determines the likelihood of an accident on an annual basis. These frequencies can be multiplied by the expected lifetime of the proposed action to determine the overall chance of an accident of a specific size. For these reasons, the risks identified specific to the study area for the proposed action, both individually and cumulatively, are lower than the risks that occur on the mainline rail system.

Comment O12-48

48. Bunkering operations are not adequately addressed nor are their mitigations proposed. The specific regulations under which bunkering operations fall are as follows:

    WAC 317.40 Bunkering Operations; 33 CFR 153 Notice of Discharge and Removal of Discharged Oil; 33 CFR 155 Oil or Hazardous Material Pollution Prevention Regulations for Vessels; 33 CFR 156 Oil and Hazardous Material Transfer Operations; 46 CFR 30-40 Tank Vessels; and WAC 173.184. Despite these 6 specific regulations, the DEIS does not quantify fueling and refueling operations that would be required for ocean going vessels, calling on the Port of Grays Harbor. An increase of these vessel calls and the possibility of the export ban being lifted requires an in depth analysis of how much bunker fuel might be exchanged during the vessel and barge visits. Also there must be an analysis of where these fuels might come from and via which routes they would take. The DEIS repeatedly states: "- To reduce the risk of an incident during vessel refueling, the applicant will ensure that any tank barges loaded with fuel for purposes of refueling vessels at the project site follow the navigation and safety mitigation measures for crude oil tank barges described in this section." However there doesn't appear to be a detail of those measures. We are told that the Geographic Response Plans for the Chehalis River and Grays Harbor will adequately protect and provide response in case of a spill. However, there is not a discussion that the USCG assets are located in Oregon, or if in Washington, at Manchester on the Kitsap Peninsula and/or Everett or Ballard. There is no discussion of the time lag of employing assets and the incident occurrence. How many tide cycles would occur from incident to deployment?

Response O12-48

Final EIS Chapter 2, *Proposed Action and Alternatives*, clarifies that proposed operations do not include vessel bunkering (fueling) at the project site. Final EIS Chapter 4, Section 4.6, *Environmental Health Risk—Vessel*, and Chapter 5, *Extended Rail and Vessel Transport*, reflect additional information about federal and state regulations related to bunkering operations.

Comment O12-49

49. The DEIS traces some of the Green House Gas impacts of the vessels, but neglects a discussion or analysis of tug boat contributions during docking maneuvers and bunkering operations.

50. Green House Gas (GHG) is compared to Grays Harbor County as a whole, but it should be compared to the study area. (3.2-10)

51. Table 8 D-11 Appendix D compares air quality of Washington State to the project instead of Grays Harbor County to the project. The County doesn't presently have air quality issues.

Response O12-49

Proposed operations would not include vessel bunkering (fueling) at the project site. Greenhouse gas emissions from tug assists and pilot boats are included in the emission estimates presented in Draft EIS Chapter 3, Section 3.2, *Air*.

Table 3.2-7 compares emissions of criteria air pollutants within the county with countywide emissions in 2011. Greenhouse gas emissions related to proposed operations and transport within the state are compared to the statewide inventories in Section 3.2.5.2, *Greenhouse Gas Emissions*.

Table 8 in Appendix D, *Air Data*, compares greenhouse gas emissions related to proposed operations and transport within the state compared to the statewide inventories. No county or study area inventories exist for comparison.

Comment O12-50

52. The DEIS throughout uses comparison scales of convenience. If it is to the advantage of the proposed project, then the impact is compared to subject area, however if it is to the project's advantage to minimize the impacts they are compared to an entire area or region. Proper scaling requires consistency. The Legislative intent of SEPA is to provide a process that responsibly "promotes efforts which will prevent or eliminate damage to the environment and biosphere." Mixing scales that presents an advantage to the project is contrary to this intent. An honest evaluation of impacts must be consistent.

Response O12-50

Consistent with the SEPA Rules, and as noted in Draft EIS Chapter 3, Section 3.0, *Introduction*, the study area for the analysis of impacts is tailored specifically to each resource area; however, in general, the study area includes resources with the potential to be affected in three areas:

- At the project site.
- Along the Puget Sound & Pacific Railroad (PS&P) rail line between the project site and Centralia, Washington, where the PS&P rail line connects to the national main line railroad system.
- In and around Grays Harbor out to 3 nautical miles from the mouth of the harbor.

Chapter 5, *Extended Rail and Vessel Transport*, qualitatively discusses the potential for offsite impacts from rail and vessel transport beyond this study area.

Comment O12-51

53. The DEIS states that the majority of impacts cannot be mitigated: therefore these proposals must be denied. In Volume 1, Chapter 4, Environmental Health & Safety the impacts of an oil spill on ground and surface water, plants, animals, aesthetics, recreation, cultural resources, tribal resources, and human health were studied. It concludes, ". . . no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill." Analysis of fire and explosion in those same categories concludes, ". . . no mitigation measures

can be implemented that will completely eliminate the possibility of a large spill or fire or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion." Looking at impact to tribal and commercial fishing, " No mitigation measures would completely eliminate the possibility of impacts to fishing resources from vessel operations related to the proposed action." Vehicle delay, " The cumulative projects would have unavoidable and significant adverse impacts on vehicle delay in Aberdeen. The mitigation measures would reduce but not completely eliminate these impacts on vehicle traffic and safety." Rail safety, ". . . no mitigation measures would completely eliminate the possibility of an incident from rail cars carrying crude oil or hazardous materials. No mitigation measures would completely eliminate the adverse consequences of an incident."

Response O12-51

Comment acknowledged.

Comment O12-52

54. There is an inconsistency of GHG contribution. For example the Westway contribution is listed as 7,796,882 metric tons per year, yet page 6-12 reports that the contribution of the facilities in a given year is 26,404,153 (Westway 6,272,352, Imperium 13,017,000 and GHRT 7,154,401). No matter which figures are correct the contribution is 100% increase over the No-Action Alternatives (3.2 -20)

55. The DIES makes the following statement concerning impact to GHG, "However, over the 20-year analysis period, improvements in the efficiency of locomotives may decrease the total GHG . . ." (3.2-18) This statement is inappropriate and does not fit in an honest analysis of impacts. Using this logic of argument, one could just as easily say that locomotives in the future will be solar-powered and all of their GHG input would be ended. This is disingenuous.

Response O12-52

The estimate of greenhouse gas emission from combustion of the maximum annual throughput volume under the proposed action has been corrected in Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, to reflect the amount presented in Chapter 3, Section 3.2, *Air*. The statement regarding anticipated improvements in the efficiency of locomotives that may decrease annual greenhouse gas emission related to offsite transport is based on federal rule requirements for more efficient engines in future years, historical improvements and industry trends.

Comment O12-53

56. The Final must include a rigorous No Project Analysis, which is missing here. The dismissiveness with which the No-Action Alternative is treated throughout the DEIS shows a bias to the projects at hand and doesn't properly reflect the absence the proposed projects. For example 3.2.51 states in part ". . . Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in impacts similar to those described for the proposed action." 3.2-9. Crude oil presents a unique characteristic to the estuary, ocean coast and the commercial, recreational and tribal interests within the area. To imply that we should go ahead with an unwise, destructive project now, because someone will propose one in the next 20-year period

is insulting to the citizens who livelihoods and traditions depend on clean water, and a healthy estuary.

Response O12-53

The analysis of the no-action alternative does not assume that a future development similar to the proposed action would occur at the project site. Refer to the Master Response for Baseline and No-Action Alternative. Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, presents the analysis of impacts that could occur as a result of construction and routine operations of the proposed action; Chapter 4, *Environmental Health and Safety*, presents the analysis of the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil) under the proposed action.

Comment O12-54

57. The DEIS process has failed in at least two additional areas:

    1. Many scoping comments were left off of the original publication. Those omitted were from very important sources, such as the Quinault Indian Nation, the Washington Dungeness Crabbers Association, the Washington Environmental Association, and others. Although Department of Ecology issued a separate publication including what they determined was omitted, much of the public didn't know this and was likely unable to read them.

    2. The Comment WORX contractor was not working from November 6-10. There is no way to know how many people sent in comments that never made it in. This is unacceptable. If the process cannot be done properly, it needs to be done over.

Response O12-54

The co-leads reviewed and considered all scoping comments. Final EIS Appendix A, *Scoping Comments*, provides a catalog of all comments received during the formal scoping period. The CommentWorks site was tested and no problems were identified. Additionally, a call in number was made available to the public to use in case of additional problems. Other means of commenting, such as writing comments by mail and attending public hearing were also available.

Comment O12-55

58. The modeling on sea level rise was inadequate and did not rely on best available science.

Response O12-55

The sea level change discussion in Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts, Climate Change*, relies on the values reported by the National Research Council of the National Academy of Sciences 2012.1

[1] National Research Council. 2012. *Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future*. Available: http://ssi.ucsd.edu/scc/images/NRC%20SL%20rise%20W%20coast%20USA%2012.pdf.

Comment O12-56

59. The value of nearshore ecosystems was inadequate, therefore minimizing the impacts of crude oil transport and storage in Grays Harbor (Valuing Nearshore Ecosystems in Grays Harbor, Earth Economics, July 2014)

Response O12-56

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Initial Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O12-57

60. The value of saltmarshes to carbon sequestration was ignored. Saltmarshes would be particularly vulnerable to any type of crude oil spill. (National Fisheries Conservation Center studies).

Response O12-57

Draft EIS Section 3.4.4.3, *Grays Harbor*, notes that carbon sequestration is among the values of saltmarshes. Because the potential impacts of an oil spill would vary based on the material spilled, weather, water flows, location and other factors, the discussion of impacts presented in Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Section 4.7.1.2, *Plants*, describes the potential impacts to plants because of an oil spill. As noted in the Draft EIS, mitigation would not completely eliminate the possibility of an incident, and depending on the specific circumstances of an incident, the environmental impacts could be significant.

Comment O12-58

61. There is no listing of fugitive emissions from the rail cars storage area or transfer from and to tanks. Toxic emissions during these processes can cause serious health issues for workers and others.

Response O12-58

Draft EIS Appendix D, *Air Data*, Table 5, reports onsite emissions of criteria and air toxic pollutants, including fugitive emissions during filling and draining and from storage tank valves and flanges. It also reports onsite emissions of these pollutants from annual storage tank cleaning, from the marine vapor control system during vessel loading and from onsite rail operations and vessel hoteling.

Comment O12-59

62. Mitigation and response for crude oil tank fires are totally inadequate and underscores the lack of understanding of the nature of these fires. Firefighters are told to step back and let the fires burn. Yet, the DEIS states, for example, the City of Elma will be given a foam truck to deal with an explosion and fire. (S-53)

Response O12-59

Final EIS Chapter 4 has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7 describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment O12-60

63. The economic impacts of an oil spill have not adequately been expressed in the DEIS and as a consequence their impacts have been minimized. See FOGH economic study (attached) for non-tribal impacts and Quinault Indian Nation's economic study for tribal impacts. As a consequence the cost-benefit analysis for the City of Hoquiam is under-valued and not accurate.

Response O12-60

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Costs-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Comment O12-61

64. The DEIS fails to consider the compatibility of the proposed projects with existing tenants and the impacts of loading/unloading, storage and transferring of crude oil might have on those tenants. For example, APG is planning doubling the size of their processing plant in Nebraska, which will have impacts for the Port of Grays Harbor and their operations here.

Response O12-61

Draft EIS Chapter 3, Section 3.8, *Land and Shoreline Use*, acknowledges that the proposed facilities are compatible with land use policies in place at the time of application was made to the City of Hoquiam. The proposed loading/unloading, storage, and transfer activities will take place within the project site and will not conflict with other tenants at the Port of Grays Harbor.

Comment O12-62

65. A recent study by NOAA analyzing the aftermath of the Exxon Valdez spill found that extremely low levels of crude oil can cause heart problems in fish, this needs to be studied for its affects in the Grays Harbor Estuary.

Response O12-62

Draft EIS Chapter 4, Section 4.7.1.3, *Animals*, addresses the impacts of crude oil on fish.

Comment O12-63

65. "An oil train derailment involving multi-car fires in a highly populated area could result in hundreds of deaths, despite herculean efforts of first responders." -- Greg O'Sullivan, retired Fire Chief, Templeton, California How was this scenario mitigated in the DEIS?

Response O12-63

Draft EIS Section 4.5, *Environmental Health Risks—Rail Transport,* discusses the potential risks and proposed mitigation measures related to rail transport and impacts on environmental health and safety. Section 4.5.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport?* acknowledges that no measures can completely eliminate the chance that an incident could occur.

Comment O12-64

66. The tides, currents and river flows were gleaned from a different watershed and do not reflect the reality of the Chehalis River Watershed, its estuary and the ocean currents within the area. As a result spill modeling and accurate fate and transport of crude oil cannot be properly assessed and is underrated, under-assessed and not properly mitigated.

Response O12-64

Refer to the Master Response for Oil Spill Modeling.

Comment O12-65

It must be concluded that the DEIS fails to address the magnitude of the impacts transporting and storing crude oil on every aspect of life in Grays Harbor County. We MUST NOT expand crude oil transport, storage or refinery anywhere in our State, as there is no mitigation possible for the complex, cumulative, and contrary impacts to these projects. This DEIS must not enable these projects going forward. The permits must be denied.

Sincerely,

Arthur (R.D.) Grunbaum
President

Response O12-65

Comment acknowledged. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

O13, Friends of Grays Harbor, Arthur Grunbaum

Comment O13-1

Please find attached a few of the many resolutions passed by public entities in opposition to crude by rail.

[Attachments]

Response O13-1

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, Attachments.

O14, Friends of Grays Harbor, Arthur Grunbaum

Comment O14-1

Additional resolutions

[Attachments]

Response O14-1

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, Attachments.

O15, Friends of Grays Harbor, Arthur Grunbaum

Comment O15-1

[Attachments: The Behaviour and Environmental Impacts of Crude Oil Released into Aqueous Environments Report; Crude oil effects on the aquatic environment]

Response O15-1

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4,

Environmental Health and Safety, and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, Attachments.

O16, Friends of the Columbia Gorge, Ryan Rittenhouse

Comment O16-1

Thank you for the opportunity to provide testimony. My name is Ryan Rittenhouse, I work for Friends of the Columbia Gorge. I live in Portland, Multnomah County.

So, Friends of the Columbia Gorge is a member of the (Inaudible) Oil Coalition, and we oppose this and all the other oil terminal projects throughout the Pacific Northwest. I'd also like to reiterate and support the comments that were given Quinault Nation and any comments you're likely to receive from my tribal nation.

The risks that these oil transport projects pose to the Columbia River Gorge National Scenic area are profound and enormous.

Even if a disaster never happens, the volution environmental and public health impacts from the extraction, transport, and burning of this product are extremely damaging to the environment of the Pacific Northwest and the world in general.

But the chances that a disaster can happen within the national scenic area are quite large in proposals like this. This can result in a massive, massive increase in rail transport through the Columbia River Gorge. It would go by many neighborhoods, many schools, many other sensitive areas. It would go through national wildlife refuges and be very close to impacting all sorts of natural areas and wildlife places.

The potential impacts from a spill on salmon populations and other river wild life are huge and the costs of a project like this are just -- they just far outweigh the potential benefit, if any benefit that we would see in this region.

So please do whatever you can to stop these proposals. In the Columbia River Gorge we kind of pride ourselves on being able to work hand in hand with the 14 urban areas there to promote sustainable economic development that is responsible. This does not qualify as that, this is exactly the opposite of sustainable responsible development. So please say not to these permits. Thank you.

Response O16-1

Comment acknowledged.

O17, Friends of San Juans, Stephanie Buffum

Comment O17-1

Thank you for this opportunity to submit comments on the Draft Environmental Impact Statements ("DEISs") for the proposed expansions of the Westway Terminal Company LLC and Imperium Terminal Services bulk liquid storage terminals ("Projects") located at the Port of Grays Harbor

Terminal 1. In addition to our attached comment letter, two attachments are enclosed: The Power to Say "No": SEPA's Substantive Authority and Controversial Fossil Fuel Projects and Risk Assessment of Transporting Canadian Oil Sands, Report to Congress from US Coast Guard, May 29, 2014.

Friends of the San Juans

PO Box 1344, Friday Harbor, WA 98250 Phone: 360-378-2319 Fax: 360-378-2324
www.sanjuans.org

November 23, 2015

Comments submitted via online comment form:
https://public.commentworks.com/cwx/westwayimperiumcommentform/

The City of Hoquiam and the Washington State Department of Ecology

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

RE: Draft Environmental Impact Statements for proposed expansions of the Westway Terminal Company LLC and Imperium Terminal Services.

To the City of Hoquiam and the Washington State Department of Ecology:

Thank you for this opportunity to submit comments on the Draft Environmental Impact Statements ("DEISs") for the proposed expansions of the Westway Terminal Company LLC and Imperium Terminal Services bulk liquid storage terminals ("Projects") located at the Port of Grays Harbor Terminal 1.

FRIENDS of the San Juans ("FRIENDS") is a 501(c)(3) non-profit organization established in 1979 to protect and restore the San Juan Islands and the Salish Sea for people and nature. In 2014 our annual budget was $800,000 and we represent over 2,000 members. Using science, policy, law, education, and citizen activism, FRIENDS works to protect, preserve, and restore the land, water, and sea of the San Juan archipelago. Our activities include protection of Southern Resident Killer Whales and other endangered species; marine research and habitat restoration; ecological stewardship and conservation; land use and environmental compliance; community engagement and education. Our members live, work, and recreate in the San Juan Islands and the surrounding waters, where they enjoy observing wildlife and our natural heritage. Although the proposed Projects are located in Grays Harbor, the proposed Projects' vessel traffic would enter the Salish Sea. Potential crude oil spills from the Projects' tankers and/or tank barges would adversely impact the Salish Sea and the environment, economy and quality of life for marine dependent species and San Juan Islands' residents and visitors.

The proposed Projects would include up to 638 additional crude oil tanker and tank barge transits in the Salish Sea each year. FRIENDS is concerned about the environmental and economic adverse impacts that would result from a Projects-related oil spill. While FRIENDS is concerned about the potential adverse impacts to the Grays Harbor community and we want to ensure that the Final Environmental Impact Statements (FEISs) fully addresses all potential adverse impacts of the proposed Projects in the Salish Sea. The implications for natural resource damages from a Projects-related oil spill are grave. The Salish Sea ecosystem already includes a number of species that are

being protected and/or monitored by the United States and/or Canada. According to Gaydos and Zier (2013), "As of November 15, 2013, there were 119 species at risk in the Salish Sea, almost twice the number of species at risk when the indicator was first established in 2002. . . . currently 35% of mammal species, 32% of bird species, 17% of fish species, 100% of reptile species, and less than 1% of macro invertebrate species are listed by one or more jurisdiction. The high proportion of species of concern is suggestive of ecosystem decay and we recommend that it is time to consider the Salish Sea an ecosystem of concern." [Footnote 1: Gaydos, J. K. and J. Zier. 2013. Species of Concern within the Salish Sea nearly double between 2002 and 2013. Proceedings of the 2014 Salish Sea Ecosystem Conference, April 30 – May 2, 2014, Seattle, Washington.]

Response O17-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Comment O17-2

The San Juan Islands have 59 documented forage fish (surf smelt/pacific sand lance/pacific herring) spawning sites that extend along only 10 miles of the more than 400 miles of shoreline in San Juan County. In addition eelgrass and kelps, a priority submerged aquatic habitat listed along with forage fish spawning beaches under the County's Critical Areas Ordinance is present throughout the San Juans. Due to such factors, the San Juans have a relatively pristine shoreline and have received over 10 million dollars of federal salmon enhancement dollars since 2001. San Juan County includes extensive Shoreline Fish and Wildlife Habitat Conservation Areas, including smelt, sand lance, and herring spawning areas; salmon habitat; eelgrass and kelp beds; and recreational and commercial shellfish areas. San Juan County also includes WAC 220-16-440 San Juan Islands Marine Preserve Area, the San Juan Island National Historical Park Marine Protected Area, and RCW 28B.20.320

Marine Biological Preserve. San Juan County is also included in the critical habitats of the Southern Resident Killer Whales and the Bocaccio, Canary, and Yelloweye Rockfish.

Recent research has concluded that pocket beaches surrounding the San Juans have the highest rate of wild juvenile Chinook salmon presence of any shoreline type in San Juan County, approximately four times greater than that for rocky shorelines. Juvenile Chinook salmon, which are listed as threatened under the Federal Endangered Species Act, are not only most likely to be found near pocket beaches, but are also more likely to be found there in greater numbers. Likewise, surf smelt are much more likely to be found along pocket beaches than rocky shorelines. The adjacent figure by Beamer and Fresh illustrates the origins of the numerous species, populations and stocks of salmon that migrate through the San Juans and the primary migratory pathways. [Footnote 2: Beamer, E. and K. Fresh. 2012. Juvenile Salmon and Forage Fish Presence and Abundance in Shoreline Habitats of the San Juan Islands, 2008 -2009: Map Applications for Selected Fish Species.]

Potential oil spills from the proposed Projects would severely impact these primary salmon migratory pathways and the salmon that are identified as endangered or at risk. A Projects-related oil spill would also impact other species listed as endangered including the Southern Resident Killer Whale, rockfish and marbled murrelet. The DEISs do recognize that federally listed as endangered species "may occur off the Washington coast near Grays Harbor" (Section 3.5 Animals); however, the DEISs do not address the significance of Grays Harbor to the Southern Resident Killer Whales who frequent the waters outside Grays Harbor as shown by the NOAA Northwest Fisheries satellite tagging studies as indicated in the map below. [Footnote 3: NOAA Northwest Fisheries Science Center's 2015 Southern Resident Killer Whale Satellite Tagging website: http://www.nwfsc.noaa.gov/research/divisions/cb/ecosystem/marinemammal/satellite_tagging/blog2015.cfm]

[Map reviewed but not reproduced.]

The well-being of the Southern Resident Killer Whales depends on maintaining the abundance of Chinook salmon that use Grays Harbor for their transition to fresh water spawning sites. A large spill of crude oil, or even worse, of diluted bitumen, would significantly impact the numbers of salmon available to the Southern Resident Killer Whales.

Furthermore, the DEISs are deficient in that they do not address Projects-related impacts to the critical habitats of all the species that are federally listed as endangered. Please require the FEISs to thoroughly address all adverse impacts to all the endangered species and their migratory pathways and critical habitats that would be impacted by the proposed Projects

Response O17-2

Draft EIS Chapter 3, Section 3.5, *Animals*, addresses impacts on killer whales in the study area, specifically under the vessel impact discussions for vessel strikes with marine mammals and underwater vessel noise impacts on marine mammals. Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, addresses oil spill impacts on aquatic species, including all fish and marine mammals. All federally listed threatened and endangered species and critical habitat in the study area are also addressed in Section 3.5, and all special-status species in the study area are listed in Appendix F, *Special-Status Species*. Refer to response to the previous comment regarding impacts in the extended study area.

Comment O17-3

FRIENDS is not only concerned about the local environmental and socio-economic impacts associated with the proposed Projects, but those on a state-wide level as well. Maintaining the health, integrity, and natural beauty of our great State of Washington is critical to the State's economy. Preserving the quality of the outer coast and the Salish Sea is essential to all the tribal, international, national and local commercial vessels, and recreational vessels that must transit these shared waters.

Ecology estimates that a major oil spill in Washington State would cost 165,000 jobs and $10.8 billion in annual economic activity. [Footnote 4: Final Cost Benefit and Least Burdensome Alternative Analysis; Chapter 173-182 WAC Oil Spill Contingency Plan; December 2012; Publication no. 12-08-014; Prepared by Kasia Patora for Spill Prevention, Preparedness, and Response Program; Washington State Department of Ecology; page 6:

https://fortress.wa.gov/ecy/publications/summarypages/1208014.html] However, these figures are undervalued because, in addition to being outdated, this estimate does not include any costs associated with the impacts of oil spills to privately owned properties. At the local level, according to the San Juan County Economic Development Council, the quality of San Juan County's marine environment and marine-related natural resources are major drivers of the tourism, construction, real estate, and retail industries that represent nearly 80% of San Juan County's total economy. The economy of San Juan County is dependent on the tourists that are attracted by the Southern Resident Killer Whales that spend their summer months in the San Juan and Gulf Islands. A Projects-related oil spill in the Salish Sea would have a devastating effect on San Juan County's interconnected environment and economy, as well as in all the surrounding communities, tribes, and commerce that depend upon these marine resources.

The DEISs are deficient in that there is no state-wide or county specific economic data on natural resource dependent jobs and related revenues which would be adversely impacted in the event of a Projects-related oil spill. Please require the FEISs to include economic data on natural resource dependent jobs and revenues, and county specific data for all the counties that would be affected by the proposed Projects, including the coastal counties on the outer coast and in the Salish Sea. Further, the DEISs are deficient in that they only include a cost-benefit analysis for the City of Hoquiam, which does not adequately address the costs associated with oil spills and Canadian oil sands diluted bitumen spills in particular. Please require the FEISs to include cost-benefit analyses for all the cities and counties that would be affected by the proposed Projects, including the costs associated with diluted bitumen spills in particular.

Response O17-3

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS.

The approach to the risk analysis for the study area is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms regardless

of the specific location. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O17-4

The DEISs state that the Projects' objective "is to expand the existing bulk liquid storage terminal to receive crude oil by train, store the crude oil, and load crude oil onto tank vessels at the Terminal 1 dock for shipping to refineries on the West Coast and potentially abroad" with the footnote clarifying that, "U.S. law currently prohibits the export of domestic oil; however, it is possible those regulations could change. If the crude oil were to could come from a Canadian source, this prohibition would not apply, and the oil could be shipped abroad" (Summary Section). The DEISs are deficient in not fully addressing the unique and costly impacts from spills of Canadian Oil sands which is also known as diluted bitumen.

Attached is the United States Coast Guard report to Congress, "Risk Assessment of Transporting Canadian Oil Sands," states:

While Canadian oil sands products appear at first glance to have similar properties as other types of oil, response challenges can stem from uncertainties about the fate and behavior of Canadian oil sands products spilled into aquatic environments. (page 18)

And:

Spills such as the Kalamazoo River discharge demonstrate the potential for fractionation of the spilled product, warranting response plans that address the combination of equipment and techniques for Group I [light] and Group V [denser than water] oils . . . (page 19)

The DEISs' discussion on vessel contingency planning (section 4.6.2.1 Oil Spills) is deficient in that they do not specify the unique challenges of Canadian oil sands/diluted bitumen crude oil spills as identified in the USCG report to Congress. FRIENDS asks that the FEISs fully address the requirement that oil spill contingency plans be required to include the combination of equipment, techniques and personnel for responding to spills of Group 1/Group I and Group 5/Group V oils.

The USCG report to Congress also states that "the evaporation of volatile components of the diluents in Canadian oil sands products results in potentially toxic and/or flammable VOCs in the atmosphere above the spill" (page 18). Section 3.14 Hazardous Materials does not address the potentially toxic and/or flammable properties of Canadian oil sands/diluted bitumen or their adverse impacts. Please require the FEISs to thoroughly address all adverse impacts of the Canadian oil sands/diluted bitumen's potentially toxic and/or flammable VOCs.

Financial responsibility requirements must address the high cost of cleaning up a spill of diluted bitumen crude oil. The cost-to-date, as of June 30th, 2015, of the 2010 Enbridge pipeline spill of Canadian tar sands crude oil is $1.2 billion, with a cost per barrel of $60,000. [Footnote 5: Enbridge Inc. Second Quarter Interim Report to Shareholders for the six months ended June 30, 2015, Pages 15-16: http://www.enbridge.com/~/media/www/Site%20Documents/Investor%20Relations/2015/2015_Q2_ENB_Report_to_Shareholders.pdf] These costs do not include the as yet to be levied US

Environmental Protection Agency's Clean Water Act fine. The DEISs identify a spill volume of 360,000 barrels for a vessel allision. At a clean-up cost of $60,000 per barrel, a spill of 360,000 barrels of diluted bitumen crude oil would cost $21,600,000,000.

However, it is unclear whether the 360,000 barrels identified in the DEISs is the worst case spill volume, which is defined in RCW 88.46.010:

> "Worst case spill" means: (a) In the case of a vessel, a spill of the entire cargo and fuel of the vessel complicated by adverse weather conditions; and (b) in the case of an onshore or offshore facility, the largest foreseeable spill in adverse weather conditions.

Response O17-4

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

Comment O17-5

The DEISs state that, "prior to beginning the proposed operations the applicant will conduct a study to identify an appropriate level of financial responsibility for the potential costs for response and cleanup of oil spills, natural resource damages, and costs to state and affected counties and cities for their response actions. … Based on the study, Ecology shall determine the appropriate level of financial responsibility and require the applicant to demonstrate their financial responsibility to the satisfaction of Ecology. Proof of financial responsibility will be included as documentation in the applicant's contingency plan." (Section 4.4.3.1 Applicant Mitigation.)

FRIENDS requests that in order to determine the appropriate level of financial responsibility, the FEISs require the Projects' applicants' studies to identify worst-case spill volumes (per RCW 88.46.010) and associated clean-up costs for both diluted bitumen crude oil and Bakken crude oil in each of the following areas: Grays Harbor, along the outer coast, and within the Salish Sea.

Response O17-5

The proposed mitigation measure referenced states the study should address the factors in RCW 88.40.025, Evidence of Financial Responsibility for Onshore or Offshore Facilities, including a reasonable worst-case spill volume. The scope of the study would be approved by the Washington State Department of Ecology.

Comment O17-6

The Cumulative Impacts (section 6) and Environmental Health and Safety (section 4) sections of the DEISs only address oil spill risk involving vessels transporting crude oil and bulk materials in Grays Harbor. The DEISs are also deficient in their lack of any analyses of the adverse impacts to tribal treaty protected usual and accustomed fishing areas in the Salish Sea; and to tribal, commercial, and recreational fishing and shellfishing in the Salish Sea. Please require the FEISs to thoroughly address

oil spill risk and associated adverse impacts as well as all adverse impacts to tribal treaty protected rights in the Salish Sea, and all adverse impacts to tribal, commercial, and recreational fishing and shellfishing.

Response O17-6

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

Comment O17-7

The DEISs' Westway and Imperium Expansion Projects Risk Assessment Technical Report is deficient in that it only addresses proposed Projects-related vessel traffic in the Salish Sea as an additional percentage to the existing vessel traffic without including reasonably foreseeable future vessel traffic.

The DEISs' risk assessment does not address the other project proposals and permitted projects in the analysis. FRIENDS has recently completed the Salish Sea Vessel Traffic Projections, which concludes that if all the new and expanding terminal and refinery projects within the Salish Sea are permitted and developed, including projects that became operational in 2014, there would be a 43 percent increase in large, commercial marine vessel traffic. [Footnote 6: Salish Sea Vessel Traffic Projections. 2015. FRIENDS of the San Juans and San Juan Islanders for Safe Shipping. http://www.sanjuans.org/safeshipping/]

The proposed Projects-related vessel traffic, combined with the vessel traffic projections for projects within the Salish Sea, would increase projected commercial shipping traffic, above 2013 levels, by 47.9 percent. A site- and conditions-specific systems vessel traffic risk assessment approach, similar to the VTRA [Vessel Traffic Risk Assessment] 2010 Final Report [Footnote 7: Van Dorp, J. R., and J. Merrick. 2014. VTRA 2010 Final Report: Preventing Oil Spills from Large Ships and Barges in Northern Puget Sound & Strait of Juan de Fuca. Prepared for Washington State Puget Sound Partnership. 166 p.] is necessary to adequately understand the risk of accidents and oil spills resulting from the proposed Projects' increase in crude oil tanker and tank barge vessel traffic and that vessel traffics' contribution to the increase in the risk of an oil spill.

In summary, here is a list of the FRIENDS' respectfully requested requirements for the FEISs:

(1) Address all potential Projects-related adverse impacts in the Salish Sea.

(2) Address all potential Projects-related adverse impacts to all the endangered species, their migratory pathways, and their critical habitats.

(3) Include economic data on natural resource dependent jobs and revenues, and city and county specific data for all the communities that would be affected by the proposed Projects.

(4) Include cost-benefit analyses for all the cities and counties that would be affected by the proposed Projects, including the costs associated with crude oil spills and diluted bitumen spills in particular.

(5) Address all potential Projects-related oil spill risk and associated impacts in the Salish Sea.

(6) In order to determine financial responsibility requirements, require the Projects' applicants' studies to identify worst-case spill volumes (per RCW 88.46.010) and associated clean-up costs for both Canadian oil sands/diluted bitumen crude oil and Bakken crude oil in each of the following locations: Grays Harbor, along the outer coast, and within the Salish Sea.

(7) Require oil spill contingency plans be to include the combination of equipment, techniques and personnel for responding to spills of Group 1/Group I and Group 5/Group V oils.

(8) Address all potential Projects-related adverse impacts to tribal treaty protected rights in the Salish Sea.

(9) Address all potential Projects-related adverse impacts to tribal, commercial, and recreational fishing and shellfishing in the Salish Sea.

(10) Include a cumulative impacts analysis of vessel traffic in the Salish Sea that includes all current and reasonably foreseeable future vessel traffic.

(11) Include a site- and conditions-specific systems vessel traffic risk assessment in order to adequately understand the risk of accidents and oil spills resulting from the proposed Projects' increase in crude oil tanker and tank barge vessel traffic and that vessel traffics' contribution to the increase in the risk of an oil spill.

Thank you for this opportunity to comment on these DEISs and for thoroughly addressing these concerns and deficiencies in the FEISs for the proposed expansions of the Westway Terminal Company LLC and Imperium Terminal Services bulk liquid storage terminals located at the Port of Grays Harbor.

Sincerely,

Stephanie Buffum
Executive Director
FRIENDS of the San Juans

Response O17-7

For information about the qualitative approach to analyzing impacts in the extended study area, refer to Response to Comment O17-1.

For information about consideration of other proposals in the Draft EIS, refer to the Master Response for Connected or Similar Actions.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for an explanation of the scope of the analysis of potential economic impacts in Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis.*

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Oil contingency plan requirements are presented in Final EIS Section 4.2, *Applicable Regulations*.

Refer to the Master Response for Risk Assessment Methods for an explanation of the assumptions, methods, and data sources used in the analysis of risks.

O18, Friends of San Juans, Stephanie Buffum

Comment O18-1

Thank you for this opportunity to supplement our November 23 comments on the Draft Environmental Impact Statements ("DEISs") for the proposed expansions of the Westway Terminal Company LLC and Imperium Terminal Services bulk liquid storage terminals ("Projects") located at the Port of Grays Harbor Terminal 1 (attached). Thank you, Stephanie Buffum Executive Director

FRIENDS OF THE SAN JUANS

PO Box 1344, Friday Harbor, WA 98250 Phone: 360-378-2319 Fax: 360-378-2324
www.sanjuans.org

November 30, 2015

Comments submitted via online comment form:

https://public.commentworks.com/cwx/westwayimperiumcommentform/

The City of Hoquiam and the Washington State Department of Ecology
Westway and Imperium Expansion Projects EISs
c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

RE: Draft Environmental Impact Statements for proposed expansions of the Westway Terminal

Company LLC and Imperium Terminal Services.

To the City of Hoquiam and the Washington State Department of Ecology:

Thank you for this opportunity to submit comments on the Draft Environmental Impact Statements ("DEISs") for the proposed expansions of the Westway Terminal Company LLC and Imperium Terminal Services bulk liquid storage terminals ("Projects") located at the Port of Grays Harbor Terminal 1.

FRIENDS of the San Juans ("FRIENDS") is a 501(c)(3) non-profit organization established in 1979 to protect and restore the San Juan Islands and the Salish Sea for people and nature. In 2014 our annual budget was $800,000 and we represent over 2,000 members. Using science, policy, law, education, and citizen activism, FRIENDS works to protect, preserve, and restore the land, water, and sea of the San Juan archipelago. Our activities include protection of Southern Resident Killer Whales and other endangered species; marine research and habitat restoration; ecological stewardship and conservation; land use and environmental compliance; community engagement and education. Our members live, work, and recreate in the San Juan Islands and the surrounding waters, where they enjoy observing wildlife and our natural heritage. Although the proposed Projects are located in Grays Harbor, the proposed Projects' vessel traffic would enter the Salish Sea. Potential crude oil spills from the Projects' tankers and/or tank barges would adversely impact the

Salish Sea and the environment, economy and quality of life for marine dependent species and San Juan Islands' residents and visitors.

These comments are in addition to FRIENDS' comments submitted on November 23, 2015. Attached please find the MEMORANDUM OF UNDERSTANDING BETWEEN THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND THE BRITISH COLUMBIA ENVIRONMENTAL ASSESSMENT OFFICE ("WA-BC MOU"). The DEISs do not appear to reference the WA-BC MOU. While the proposed Projects will be located in Grays Harbor County, they would include up to 638 additional annual crude oil tanker and tank barge transits in the international waters of the Salish Sea for the delivery of crude oil to Washington State refineries in Whatcom and Skagit counties. This proposed volume of increased crude oil tanker and tank barge vessel traffic constitutes a major project and notification should be provided to the British Columbia Environmental Assessment Office as outlined in the WA-BC MOU.

The Department of Ecology has been designated as an intervenor by Canada's National Energy Board for the Trans Mountain Pipeline Expansion project application. FRIENDS is a commentor for this project and has also submitted comments during public review processes for other British Columbia projects that would increase vessel traffic and increase the risk of oil spills in the Salish Sea. It is challenging to engage in the review of project proposals in British Columbia that do not address project impacts to Washington State. The WA-BC MOU recognizes that the Salish Sea is a shared waterway, where major projects can have impacts across the international border. It is incumbent upon the Department of Ecology to notify the British Columbia Environmental Assessment Office and provide our neighbors with the opportunity to review these proposed projects.

FRIENDS asks that the FEISs address deficiencies in the DEISs and document that the notification, as outlined in the WA-BC MOU, has occurred.

Thank you for this opportunity to comment on the DEISs for the proposed expansions of the Westway Terminal Company LLC and Imperium Terminal Services bulk liquid storage terminals located at the Port of Grays Harbor.

Sincerely,

Stephanie Buffum
Field Executive Director
FRIENDS of the San Juans

Response O18-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 further describes the potential risks associated with rail a transport in this area.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

O19, Grays Harbor American Bird Conservancy, Steve Holmer

Comment O19-1

American Bird Conservancy
Shaping the future for birds

November 30, 2015

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

Dear Sir or Madam:

On behalf of American Bird Conservancy (ABC), thank you for this opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the proposed Westway and Imperium oil-by-rail terminals. ABC is concerned about likely impacts to birds, a Western Hemisphere Shorebird Reserve, and other coastal habitats, and urge that both of the proposed projects not be recommended to move forward.

Grays Harbor is an extremely important migration stopover location for shorebirds on the West Coast, including a major percentage of that population of Red Knots in the Pacific Flyway. In fact, it is recognized by the Western Hemisphere Shorebird Reserve Network as a "site of Hemispheric Importance", as sited below. Grays Harbor is also a very important area for many other species of birds. From the Grays Harbor National Wildlife Refuge (Bowerman Basin) website:

"located within Grays Harbor Estuary, at the mouth of the Chehalis River, which makes up the second largest watershed in Washington. It is one of four major staging areas for migrating shorebirds in the Pacific Flyway. Up to one million shorebirds gather here in spring and fall to feed and rest.

Grays Harbor is designated as a Western Hemisphere Shorebird Reserve Network Site, recognizing this internationally-significant shorebird habitat. Although the refuge occupies only two percent of the intertidal habitat of Grays Harbor, it hosts up to 50 percent of the shorebirds that stage in the estuary.

As many as 24 species of shorebirds use Grays Harbor Refuge, with the most abundant species being western sandpiper and dunlin. Semi-palmated plover, least sandpiper, red knot, and black bellied plover are also common during migration. The refuge is also used by peregrine falcon, bald eagle, northern harrier, Caspian tern, great blue heron, songbirds, and a variety of waterfowl."

Grays Harbor is the sight of annual Shorebird Festival that attracts tourists and brings significant economic benefits to the area. Grays Harbor Audubon Society, Grays Harbor National Wildlife Refuge, and the City of Hoquiam work with a host of other local sponsors to host the Grays Harbor Shorebird Festival. These tourists come to witness the migration that happens each spring, when hundreds of thousands of shorebirds stop to rest and feed in Grays Harbor estuary on their migration northward. Coming from as far south as Argentina, these Arctic-bound shorebirds are among the world's greatest migrants. Some birds travel over 15,000 miles round trip! Tens of thousands of shorebirds feed on the open mudflats in the estuary.

This concentration of birds offers people a great chance to view a number of shorebird species, and with luck, to see the birds fly together in beautiful formations while trying to escape the fastest creature on earth, the Peregrine Falcon. A portion of revenues in excess of festival expenses helps to

fund education programs and scientific research at Grays Harbor National Wildlife Refuge and helps pay for continuation of construction of the boardwalk, benches and interpretive signage.

Local tourism officials promote the Festival and birdwatching in Grays Harbor that occurs throughout the rest of the year:

Grays Harbor County is a bird watcher's paradise! The region tends to attract birders from all over the country. Many come to search out sea birds on the open sea boat trip out of Westport, while others take in birding in Ocean Shores.

Ocean Shores, with its rich diversity of habitat, has recorded 300 species of birds. Jetties may host Wandering Tattler, Surfbird, or Rock Sandpiper, while nearby beaches and marshes hold migrating Pacific Golden Plover or even a rare Sharp-tailed Sandpiper.

Ocean Shores also seems to be a magnet for rare birds including Mottled Petrel, Manx Shearwater, Eurasian Dotterel, Bristle-thighed Curlew, Bar-tailed Godwit, Curlew Sandpiper, Ivory Gull, Least Tern, Long-billed Murrelet, Horned Puffin, Yellow Wagtail, and McKay's Bunting.

Not to be outdone, is Hoquiam, WA, home of the nationally recognized Shorebird Festival. Hundreds of thousands of shorebirds migrate from Central and South America to the Artic each spring, stopping at the nutrient rich mud flats of the Grays Harbor National Wildlife Refuge to refuel and rest.

The refuge has been designated a Western Hemisphere Shorebird Reserve Network Site, only one of eight such sites in the Western Hemisphere, in recognition of its importance to migrating shorebirds.

Two dozen species of shorebirds use Grays Harbor estuary during the spring and fall migration. Grays Harbor estuary is one of four major stop over areas for about one million shorebirds along the Pacific Flyway. 365 species of birds have been seen along the Washington Coast, that's over 75 percent of all species ever seen in our state. The coast of Grays Harbor is one of the top places in the US to watch birds.

Given the importance of this area to birds and other wildlife, the risk of an oil spill is too great to allow the proposed project(s) to proceed. Habitats for a number of threatened species could be impacted by an oil train spill.

Response O19-1

Refer to the Master Response for Purpose and Focus of the EIS.

Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses potential impacts from construction and routine operation of the proposed action. Increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) and potential consequences (e.g., release of crude oil) are addressed in Chapter 4, *Environmental Health and Safety*. Final EIS Section 4.7, *Impacts on Resources*, clarifies that while impacts would depend on the circumstances of the incident, the resources described in Chapter 3 could be affected. Final EIS Section 3.5, *Animals,* and Appendix F, *Special-Status Species*, have been revised to include birds of conservation concern that could occur in the study area, including the red knot. However, it should be noted that listing as a bird of conservation concern does not necessarily mean the species warrants consideration for being listed under the Endangered Species Act.

Draft EIS Chapter 4 presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted,

mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on natural, cultural, and tribal resources, including sensitive animal species.

Comment O19-2

According to the Westway DEIS:

Based on priority habitat and species data, special-status species that may occur along the PS&P rail line include northern spotted owl (Strix occidentalis), marbled murrelet (Brachyramphus marmoratus), and three subspecies of western (Mazama) pocket gopher (Thomomys mazama ssp.).

USFWS has designated critical habitat for the threatened bull trout (Salvelinus confluentus) in four streams either crossed by or adjacent to the PS&P rail line. In addition, USFWS has proposed critical habitat for the threatened Oregon spotted frog (Rana pretiosa) near the rail line along the Black River, a tributary to the Chehalis River near Oakville, Washington. Suitable habitat for northern spotted owl is located within forested habit along the rail line (Washington Department of Fish and Wildlife 2014a), however this habitat is not designated critical habitat under the ESA.

The northern spotted owl is a state-listed endangered and federally listed threated species. The owl's range is associated with the presence of coniferous forests and it is strongly associated with structurally complex forests, such as old growth, but also uses mature and some younger forests. Habitat loss is an important threat to spotted owls (Washington Department of Fish and Wildlife 2013:63-68). Designated critical habitat for the marbled murrelet occurs in a small area of forested habitat along the rail line, approximately 30 miles southeast of the project site, just east and northwest of Oakville, Washington (Washington Department of Fish and Wildlife 2014a).

Grays Harbor and adjacent nearshore marine areas provide habitat for a variety of forage fish, groundfish, and other fish species. Forage fish provide a prey base (forage) for numerous fish, birds, and marine mammals, including several threatened salmonids. The majority of these forage fish and groundfish are protected under the essential fish habitat provisions of the Magnuson-Stevens Act (Pacific Fishery Management Council 2011a, 2011b in U.S. Army Corps of Engineers 2014:81). A total of eight forage fish, 21 groundfish, and five other fish species are found in Grays Harbor and adjacent coastal nearshore habitats (Table 3.5-3).]

The Marbled Murrelet is threatened by oils spills, both from direct contact with the oil, and also from loss of forage fish in near shore areas. The DEIS notes on 3.5-15 that "survey data of marbled murrelets in and around Grays Harbor are lacking,"

The streaked horned lark (Eremophila alpestris strigata) is a ground-dwelling songbird that is federally listed as threatened and state-listed as endangered. Designated critical habitat includes Damon Point, where a breeding population is located. In Washington, nesting areas for the streaked horned lark include grasslands and sparsely vegetated areas at airports, sandy islands, and coastal spits (Washington Department of Fish and Wildlife 2013:69-73). The nesting season begins in late March and continues through August (U.S. Fish and Wildlife Service 2014h).]

The DEIS identifies substantial risks to birds from an oil spill on page 4.7-7:

Oil spills could pose a higher risk to migrating or nesting birds in the study area because populations may concentrate in one area (e.g., migratory flocks of shorebirds). A much wider range and larger number of species would potentially be affected if an oil spill were to occur along the shoreline beyond Grays Harbor and intertidal habitats during the nesting season and the spring and fall migrations. Salt marsh, mudflat, and beaches of Grays Harbor and the Grays Harbor National Wildlife Refuge support a seasonal concentration of hundreds of thousands of shorebirds migrating north between late April and early May each year (U.S. Fish and Wildlife Service 2014).

Birds that forage along the shoreline and intertidal environment could be exposed to oil and could suffer the same effects as birds that encounter oil on the surface of the water, although they might be less likely to be fully coated by oil. Birds foraging on invertebrates in these areas would ingest oils along with contaminated prey, resulting in the same toxic effects as described above (e.g., immunosuppression, skin irritation or ulceration, adrenal system damage, and behavioral changes, which could ultimately lead to death [U.S. Fish and Wildlife Service 202010]). Other animals and birds that have not been directly exposed to an oil spill, such as scavengers, can be exposed to oil by feeding on injured or dead birds that have been in contact with and contaminated by oil along the shoreline environment.]

Grays Harbor communities would take on the risk of oil transport by rail and sea, as Grays Harbor would become a major throughway for oil going elsewhere to California or overseas. Westway and Imperium, two of three proposed oil terminals for Grays Harbor between Aberdeen and Hoquiam would have the combined capacity to handle nearly 127,000 barrels, or more than 5 million gallons of oil daily (one barrel = 42 gallons) per day. The terminals would be fed by about sixteen loaded oil train deliveries every week (on average more than two per day).

The narrow, shallow shipping channel and strong currents put Grays Harbor at high risk of an oil spill. A single major spill could devastate the area's maritime economy, productive fisheries, tribal treaty rights and spectacular coastal waters.

If both terminals were built 319 loaded tankers and barges of oil would need to traverse Grays Harbor every year. The twelve mile long Grays Harbor shipping channel is narrow, shallow, subject to strong currents and has limited staging area for ships and tugs. An additional 319 trips through the Harbor by empty tankers and barges would only add to congestion and collision risk. The largest Panamax class tankers that would carry oil through Grays Harbor can hold nearly 17 million gallons and are nearly three football fields in length. The Exxon Valdez disaster in Alaska in 1979 spilled about 11 million gallons.

Response O19-2

Refer to Response to Comment O19-1.

Comment O19-3

The Washington State Department of Fish and Wildlife stated "Grays Harbor is an area particularly sensitive to the adverse effects of oil spills." A major oil spill could devastate marine resource jobs which support more than 30% of Grays Harbor's workforce according to a 2013 study by the University of Washington. An economic study commissioned by the Quinault Indian Nation found

that a major oil spill could put more than 150 tribal commercial fishermen out of a job, resulting in a direct loss of as much as $20 million in wages and up to $70 million in revenue for affected businesses.

In 2014 Washington residents took an estimated 4.1 million trips to the Washington Coast spending $481 million. More than one-third of those visits were to Grays Harbor County to enjoy its spectacular and productive coastal and ocean waters.

Response O19-3

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for an explanation of the scope of the analysis of potential economic impacts in Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns*, reflects additional information on the economic and social costs of oil spills.

Comment O19-4

Grays Harbor and the region are no strangers to oil spills. The Northwest has experienced two dozen spills and near misses over the last two decades. In 1988, the Nestucca barge holed off Grays Harbor spilling 231,000 gallons of marine bunker oil, killing or injuring an estimated 56,000 seabirds. The oil sheen was seen from Oregon to the Strait of Juan De Fuca. Grays Harbor sits in a major earthquake and tsunami zone. Geologists say the odds of a "big" Cascadia earthquake happening in the next 50 years are approximately one in three. The odds of the "very big" one are roughly one in 10. According to the U.S. Geological survey the overdue earthquake could produce waves from 20 feet to more than 100 feet high. We can expect that wall of water would topple storage tanks.

Response O19-4

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards,* describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards,* describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment O19-5

The alarming safety record of oil trains means an explosive oil train derailment may be a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line from Hoquiam to Centralia and all the way to the oil source in North Dakota and Alberta, Canada.

Oil train spills hit record levels in 2014. In 2013 more oil spilled from trains into rivers, lakes, and marine waters than in the previous forty years combined. Increased rail traffic would almost double the emissions of pollutants from rail transport in the county. Parks and some homes near the project site could be exposed to higher levels of diesel particulate pollution shown to increase the risk of cancer, asthma and other respiratory ailments.

In summary, ABC concludes that based on the current EIS it is clear that the significant risk from major oil spills, combined with the unavoidable impacts from construction, daily operations and minor, more frequent spills make both the proposed Westway and Imperium oil-by-rail terminal projects far too risky to move forward. We urge the cancellation of these projects. We recognize the hemispheric importance of Grays Harbor to wildlife, healthy ecosystems and all the economic benefits they produce on an ongoing basis are far too precious to jeopardize by these proposed projects, and they should be cancelled.

Thank you for considering these comments.

Sincerely,

Steve Holmer
Senior Policy Advisor
American Bird Conservancy

Response O19-5

O20, Comment acknowledged. Grays Harbor Audubon Society, Arnie Martin

Comment O20-1

Westway and Imperium DEIS Comments—ADM

These comments pertain to both Imperium & Westway. The reference page numbers without parentheses are from the PDF of the Westway & Imperium DEIS's from the web, the numbers in parentheses are the page numbers which appear on the bottom of the referenced page (PDF or printed). The page numbers are prefixed by "ww" if from the Westway DEIS and "im" if from the imperium DEIS.

imP16 (S-6) Onsite Operations
Although the likelihood of tsunami is unchanged with or without the proposed action, the new facilities would expose additional structures and workers to potential harm. Implementation of a tsunami evacuation plan (Table S-1, provided at the end of this summary) would reduce these risks

The applicant would be required to study the possibility of designing the proposed facilities to reduce the impacts of a large-scale tsunami event. Mitigation would be required if it was deemed reasonable and feasible.

The regulations must be set by the permitting agencies (Ecology and City of Hoquiam), not by the applicant, whose major concern is cutting construction cost. The regulations state that the protection of the public is paramount, not that the design be based on minimum cost.

Response O20-1

Refer to the Master Response for Mitigation Framework. Draft EIS Chapter 3, Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* acknowledges that a large-scale tsunami would cause unavoidable and significant adverse impacts if the facility was not constructed to withstand it. Refer to the Master Response for Seismic Risk and Design Requirements.

Comment O20-2

imP36 (S-26) Table S-3 Environmental Resource
Potential Impacts from Crude Oil Spill
Potential Impacts from Fire or Explosion
Water

This table should also describe what the effect of a Dilbit spill would be to the surface water, groundwater, river & estuary bottom sediments.

Response O20-2

Draft EIS *Summary*, Table S-3 provides a high-level summary of the impacts from an oil spill, fire, or explosion and does not address all potential impacts. Final EIS Section 4.3, *Risk Considerations*, presents additional information about the characteristics of the types of crude oil proposed for transport (including diluted bitumen) their behavior in a marine environment. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion, on surface water, groundwater, and riparian ecosystems.

Comment O20-3

imP36 (S-26) What are the potential impacts of extended rail and vessel transport?

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

This ignores the cumulative effects of the other two proposed terminals, not to mention the additional terminals proposed on the Columbia and Puget Sound. Already fossil fuel transport has forced agricultural products off the rail lines.

Response O20-3

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

Comment O20-4

imP37 (S-27) Air

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

Note that the greenhouse gas emissions do not include the eventual combustion of the crude, refining it, or the products of refining the crude. Not knowing how much the sea level will rise makes the last sentence overly optimistic.

Response O20-4

Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts, Climate Change*, and Final EIS *Summary* clarify predictions of sea level change in the study area and potential flooding at the project site. With sea level rise in the study area predicted to be 1.57 feet by 2050, the project site will remain approximately 5 feet higher than the projected high tide. As such, it would not be subject to flooding even during extreme storm events. Draft EIS Chapter 3, Section 3.2.5.2, *Proposed Action*, presents greenhouse gas emission estimates of onsite operations, offsite transport, and combustion of crude oil at maximum throughput capacity.

Comment O20-5

imP38 (S-28) Vehicle Traffic and Safety

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

These delays calculate out to be 16.4 hours above the current delays, potentially having a cumulative (no action + proposed cumulative) of more than 24 hours per week. Note that the Westgate stores are not open 24 hours per day (although Walmart is); the typical store might lose more than one day's operations per week.

Response O20-5

Comment acknowledged.

Comment O20-6

imP47 (S-37) Table S-1

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

The design criteria for tsunami effects must be set by the regulators (Ecology and City of Hoquiam), not by the proponent who is attempting to minimize the cost of the project. These facilities, if constructed, must be built to the highest standards to protect the existing marine resources.

[See original attachment for Table 4: Tsunami for calculations accordingly FEMA P646 (2012) for two scenarios: with and without Sea Level Rise for Imperium Terminal Services Facility.]

imP47 (S-37) Table S-1 3.1 Earth

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

The regulations must be set by the permitting agencies (Ecology and City of Hoquiam), not by the applicant, whose major concern is cutting construction cost. The regulations state that the protection of the public is paramount, not that the design be based on minimum cost.

Response O20-6

Refer to the Master Response for Mitigation Framework. Draft EIS Chapter 3, Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* acknowledges that a large-scale tsunami would cause unavoidable and significant adverse impacts if the facility was not constructed to withstand it. Refer to the Master Response for Seismic Risk and Design Requirements.

Comment O20-7

imP18 (S-7) Greenhouse Gases

It is totally deceptive to include the percentage of the Washington State 2050 Greenhouse Gas target generated during the rail transport of the crude oil from Centralia to Hoquiam, and in the vessel transport from Hoquiam to the 3-mile limit. The Greenhouse Gas resulting from combustion should be factored into be a more factual comparison.

Response O20-7

Draft EIS Chapter 3, Section 3.2, *Air*, presents greenhouse gas emission estimates from onsite operation of the proposed action as well as rail and vessel transport of crude oil within the state as well as combustion of the maximum annual throughput of crude oil under the proposed action based on conservative assumptions. The Final EIS presents greenhouse gas estimates from transport of crude oil from the furthest most likely source to the furthest most like destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment O20-8

imP61 (S-51) Environmental Resource—Financial Responsibility

To reduce the risks and impacts from an oil spill, prior to beginning the proposed operations, the applicant will conduct a study to identify an appropriate level of financial responsibility for the potential costs for response and cleanup of oil spills, natural resource damages, and costs to state and affected counties and cities for their response actions. The study should address the factors in Revised Code of Washington 88.40.025, Evidence of Financial Responsibility for Onshore or Offshore Facilities, including a reasonable worst-case spill volume, the cost of cleaning up the spilled oil, the frequency of operations at the facility, prevention measures employed by the facility that could reduce impacts through spill containment, immediate discovery, and shutoff times, and the damages that could result from the spill (including restoration). The study should identify any constraints related to the commercial availability and affordability of financial responsibility. Based on the

study, Ecology shall determine the appropriate level of financial responsibility and require the applicant to demonstrate their financial responsibility to the satisfaction of Ecology. Proof of financial responsibility will be included as documentation in the applicant's contingency plan.

If the appropriate level of financial responsibility, based on restoration costs from similar recent spill incidents of crude oil transportation accidents, cannot be demonstrated, then Ecology must deny the permit(s)

Response O20-8

Comment acknowledged.

Comment O20-9

imP70 (S60) Mitigation measures against oil spills

- Refueling operations.
- To reduce the risk of an incident during vessel refueling, the applicant will ensure that any tank barges loaded with fuel for purposes of refueling vessels at the project site follow the navigation and safety mitigation measures for crude oil tank barges described in this section.

No prior mention was made of ship refueling (bunkering). These operations are the most likely to cause oil spills, and such spills involve heavy oils (Bunker C), which was the oil spilled in the December 1988 Nestucca Barge spill, killing at least 56,000 birds. Bunkering spills will most likely occur at or near the Port's terminals with the bunkering occurring while the vessel is docked.

A separate section covering bunkering spill containment should be provided, not just a sentence about tug escort of bunkering barges from the bar crossing to the terminals.

Response O20-9

Final EIS Chapter 2, *Proposed Action and Alternatives*, has been revised to clarify that the applicant will not conduct bunkering at the dock. Additionally, no bunkering activities currently take place in Grays Harbor. Final EIS Chapter 4, Section 4.6, *Environmental Health Risk—Vessel*, and Chapter 5, *Extended Rail and Vessel Transport*, reflect additional information about federal and state regulations related to bunkering operations.

Comment O20-10

wwP130 (3.1.12) Liquefaction:

The Port of Grays Harbor has stated that the potential for liquefaction is low at the Imperium site, as the bank of Fry Creek is rip-rapped and other areas close to the Terminals are protected by sheet piling. The peak accelerations during the 2011 Tohoku earthquake were measured at 2.99 g. There is no rip-rap that is installed in the Terminal areas where its base is not on sandy soil. The base of the rip-rap will collapse, along with the entire bank armoring, leaving the area next to Fry Creek subject to extreme lateral spreading and potential collapse of the rail siding, the containment wall, and perhaps a failure of the tank supports.

Response O20-10

Refer to the Master Response for Seismic Risk and Design Requirements.

Comment O20-11

wwP138 (3.1-20) Landslides and Slope Instability:

The PS&P route parallels the Chehalis River for nearly 20 miles. The earth which supports the rail bed is not stable and was likely not properly compacted when the RR was built 120 years ago. The building of the rail route over the Chehalis River surge plain was proven to be a poor choice (although perhaps the only choice available) by the 2014 derailment of 11 cars of grain (soybean meal), while the train was traveling at a speed of 10 mph. The travel over this railbed by crude oil cars (which do not have baffles to prevent lateral sloshing of the liquid) would make the side to side rocking worse than the grain trains experience. To date there have been no 100+ car trains of liquids transported over the PS&P, but the plans indicate that there may be in excess of two a day, should the projects be approved.

Response O20-11

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment O20-12

wwP142 (3.1-24) states that the applicant will conduct a study to assess the technical feasibility and cost of constructing the proposed facility to withstand a CSZ L1 tsunami wave based on the Scenario 2 inputs listed in table 3 of the Tsunami Impact Modeling and Analysis.

What happens if the applicant judges the cost to be too high? Will the facility be built to some lower standard, rendering Hoquiam as even more of a sacrifice zone to the crude oil business?

Response O20-12

Draft EIS Chapter 3, Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* acknowledges that a large-scale tsunami would cause unavoidable and significant adverse impacts if the facility was not constructed to withstand it. Refer to the Master Response for Seismic Risk and Design Requirements.

Comment O20-13

wwP183-184 (3.3-18) Aquifers along the PS&P rail line are surficial, with direct connection to the stream and river banks

Any crude oil spill will render some portion of an aquifer unusable, and potentially also make a municipal supply unusable. For this reason, crude oil train spills are not mitigatable, as a spill can

occur anywhere along the 59 miles of the route, and clean-up crews will not be standing shoulder to shoulder along the tracks to stop a spill the instant it occurs.

Response O20-13

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*, presents the analysis of risk of oil spills, fires, and explosions during rail transport related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on surface water and groundwater.

Comment O20-14

wwP188 (3.3-23 paragraph 1) No mention is made of the degree of automation of tank filling and vessel loading. A facility of this size, with the amount of planned throughput, will surely have full SCADA (supervisory control and data acquisition) capabilities. Considering the possible hazards of implementing automatic control of tank and vessel filling, use of redundant controls for the SCADA implementation, both in sensors and PLC (Programmable Logic Controllers) equipment (CPU, Power Supply, I/O modules both digital and analog) must be used. The controls need to be able to continue operation during a single point failure, giving the operator time to be able to gracefully shut down the operation before repairing any failure.

Similarly, the same type of controls should be implemented by Imperium.

Response O20-14

Final EIS Chapter 2, *Proposed Action and Alternatives*, has been updated to acknowledge that monitoring of tank filling from railcar would be automated. The system would be designed to shut down the offload pumps if the destination tank reaches a predetermined height. A low tank pump cutoff prevents the internal floating roof from coming off and an interlock prevents vessel filling without the dock safety unit and vapor combustion unit fully functioning.

Comment O20-15

wwP189 (3.3-24) Vessel: the no action alternative number of vessel trips is consistently over-estimated throughout the DEIS's at 436 vessel trips per year. Personal communication from the Port of Grays Harbor Deputy Executive Director yielded the information that during 2014 there were only 115 large vessel calls, including barges. That number translates into 230 vessel trips, which is significantly below the 436 trip figure. This over-estimate of the baseline trips per year gives the impression that number of increased trips at full build-out is less significant than using a realistic number of trips for the no action alternative.

Response O20-15

The estimated 436 vessel trips in 2037 was derived by applying industry-informed moderate commodity growth projections to vessel trips associated with the present commodity volumes shipped from the Port, as described in Draft EIS Chapter 3, Section 3.17.3.2, *Impact Analysis*.

Comment O20-16

wwP238 (3.5-27) Vessel Strikes:

Related to the proposed action, the greatest potential for vessel strikes to occur would be in the shipping lanes, which are located outside of state waters (farther than 3 nautical miles from the coast). This is because large mammals, like whales, typically migrate and forage in deeper waters and are not likely to enter the harbor.

This is incorrect, as gray whales frequently are found within ½ to 2 miles of the shoreline. This is obvious, based on the Oregon State whale observations hosted by the Hatfield Marine Science Center at Yaquina Head north of Newport during the whale migration.

Response O20-16

Final EIS Chapter 3, Section 3.5, *Animals*, reflects additional information to address whale use of Grays Harbor, including frequent use by the gray whale. The vessel impact mechanisms described in Section 3.5 remain the same, but the Final EIS section clarifies that marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a greater risk from vessel strikes. As described in Section 3.5, the likelihood of vessel strikes and the potential for population-level impacts be low; therefore, potential impacts are not considered significant.

Comment O20-17

wwP353 (3.13-3) Water Supply 3.13.4.1 Water Supplies

The City of Aberdeen Public Works Department is responsible for providing municipal services related to water supply distribution to the project site. Under existing conditions, the department provides potable water to the project site. The project site currently has no industrial water demand; however, it is likely that the department would supply industrial water if needed. The department's potable water capacity is 6.5 million gallons per day and current demand averages 2.6 million gallons per day (Randich pers. comm.[a]). The industrial water supply capacity is 100 million gallons per day, of which current demand only accounts for a small fraction (Randich pers. comm. [b]).

From personal communication with the Port of Grays Harbor Deputy Executive Director, the site is supplied by a 10" water main from Aberdeen and can also use a 10" water main from Hoquiam. There is no current source for treated water in the 100 million gallon per day quantity mentioned under 3.14.4.1. Such a supply would be necessary for fire suppression, but those flow rates would require a 60" diameter line to avoid excessive pressure loss in transmission.

Response O20-17

Draft EIS Chapter 3, Section 3.13.4.1, *Water Supplies*, discusses potable water supply distribution. Chapter 4, Section 4.4, *Environmental Health Risks—Terminal (Onsite*), describes the risk of spills,

fires, or explosions related to the proposed action, and the response actions that would occur in the event of a spill, fire, or explosion at the project site. The quantities referred to by the commenter from the Draft EIS refer to the City of Aberdeen's water supply capacity, not the demand or capacity of the project site.

Comment O20-18

wwP365 (3.14-9) Bakken Crude Oil

Bakken Crude Oil may be mis-characterized in footnote 3 as having a flash point at or above 140°F. Elsewhere in the DEIS it states that some Bakken crude has a flash point as low as.73°F (P 4.3-1).

Response O20-18

Final EIS, Chapter 3, Section 3.14, *Hazardous Materials*, has been revised to be consistent with the description in Chapter 4, Section 4.3, *Risk Considerations*, that per 49 CFR 173.120, a Class 3 flammable liquid has a flash point of not more than 140°F (60°C).

Comment O20-19

wwP376 (3.15-8) PSAP upgrades & Wishkah Bridge Improvements: states that the Wishkah River bridge has a speed limit of 10 mph. The correct speed limit is currently 5 mph.

wwP379 (3-15-11) Class of Track & Speeds: The last bullet point states that the Wishkah and Hoquiam River bridges are drawbridges. They are swing bridges.

Response O20-19

Final EIS Chapter 3, Section 3.15, *Rail Traffic*, has been corrected to indicate that the current speed limit is 5 miles per hour. Final EIS Section 3.15 also clarifies that the referenced bridges are swing bridges.

Comment O20-20

wwP393-394 (3.15-25 & 26) Crossing Blockage Times: Eastbound crossing blockage times at the Gateway Mall in Aberdeen for crude oil trains are ~45 minutes. This can occur multiple times per day, resulting in loss of business and emergency service delays for tenants and mall customers.

Response O20-20

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Comment O20-21

wwP485 (4.4-5) Spill scenarios at Terminal: the numbers listed for the spill occurrence are estimates, without any factual basis from real-life operations.

Response O20-21

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment O20-22

wwP491 (4.4-11) Oil Spill financial responsibility (4.4.3.1):

"To reduce the risks and impacts from an oil spill, prior to beginning the proposed operations the applicant will conduct a study to identify an appropriate level of financial responsibility for the potential costs for response and cleanup of oil spills, natural resource damages, and costs to state and affected counties and cities for their response actions."

This means that the terminal can be built and waiting for approval of financial responsibility before beginning operations. There cannot be a worse time to begin haggling over the financial responsibility for spills than having 20+ million dollars invested in the terminal construction, then deciding how much insurance or bonding is required to begin operations. This step should occur prior to starting construction, and then reviewed at the construction completion to demonstrate that the applicant's financial resources have not been exhausted.

Response O20-22

Comment acknowledged.

Comment O20-23

wwP492 (4.4.12) 4.4.4 Would the proposed action result in unavoidable and significant adverse environmental impacts related to terminal operations at the project site? This paragraph ends with: However, no mitigation measures would completely eliminate the possibility of a large spill or explosion, nor would they completely eliminate the adverse consequences of a large spill or explosion.

wwP493 (4.4-13) 4.4.5 Who would pay for the response and cleanup of an onsite spill? Federal and State regulations conflict, with the payment amounts having federal limits (33 U.S.C. 2704(a)(4) with no explanation given of how 8 million to 350 million limits are set) and RCW 88.40 which has no limits of liability.

Response O20-23

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment O20-24

wwP496 (4.5- 2 & -3) 4.5.2 What are the potential risks of the proposed action? This section details the PS&P speed limits and the standards that are to be met for a Track Class 2 Railroad, also the likely sources of rail failure, several of which caused the 4 PS&P

derailments in 2014. The rail transport spill frequencies given in this section are speculative, at best, based on the maintenance failures at the PS&P railroad.

wwP505 (4.5-12) 4.5.3.1 Voluntary Measures and Design Features:

The voluntary measures relate to rail car design, and do not address the stark deficiencies in the design and maintenance of the PS&P RR itself. The rail facilities are necessary for the operation of the CBR terminals, yet there can be no strictures placed on the PSAP as it is a common carrier. Voluntary measures for upgrading the RR itself must be agreed to by the PS&P prior to beginning the permitting process, and must be implemented prior to beginning terminal operation.

wwP509 (4.5-16) 4.5.4 Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport?

Regulatory requirements for the prevention of, preparedness for, and response to a large spill or explosion and mitigation measures to reduce impacts are detailed above. However, no mitigation measures would completely eliminate the possibility of a large spill or explosion, nor would they completely eliminate the adverse consequences of a large spill or explosion.

wwP510 (4.5-17) 4.5.5 Who would pay for the response and cleanup of a rail transport spill?

The liability for rail transport spills is the same as described for onsite spills (Section 4.4.5) when there is the potential for waters of the United States to be affected. The polluter pays for costs and damages associated with oil spills. Response and cleanup of spills from rail cars that threaten the navigable waters or adjoining shorelines are the responsibility of the owner or operator (also referred to as the shipper) of the rail cars carrying the crude oil (RCW 88.40, Transport of Petroleum Products—Financial Responsibility).

No mention is made of the PS&P's liability in the likely event that the RR construction and maintenance contributes to a derailment-caused spill. The tracks over the Chehalis River flood plain were a contributing factor to the 10-car derailment near Central Park. Shipping such volatile materials as Bakken crude oil on the PSAP, in the RR's current state, should be considered negligence on the shipper's part, and certainly on the PS&P's part.

Response O20-24

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations, including the requirements for containment, and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including the sensitive resources identified in the comment.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents

for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment O20-25

imP491 (4.3.3) Crude Oil—Bakken Crude Oil

As discussed in Chapter 3, Section 3.14, Hazardous Materials, Bakken crude oil is typically characterized as a light crude oil; it contains more volatile components and flows more easily (is less viscous) than heavier types of crude oil. It would be expected to float on both fresh water and salt water (International Tanker Owners Pollution Federation Limited 2011a:2). In general, Bakken crude oil is moderately toxic. It contains a moderate amount of volatile components along with some persistent compounds that can cause long-term contamination of surface and subsurface waters (Washington State Department of Ecology 2015:389). This type of oil leaves a residue of up to one third the volume of the spill after a few days, and it is generally possible to clean it using appropriate response measures. Under response plan regulations (Table 4.3-1), Bakken crude oil is considered a Group II Persistent Oil.

The words "moderate amount" seem at variance with other reports that Bakken crude has a high proportion of volatiles, and also that two-thirds of the spill volume does not remain after a few days. Bakken crude contains benzene, propane, ethane, and other volatiles. This DEIS has quite a bit of information on personal protective gear for first responders, but what are the plans to protect city residents in the event of the dispersion of two-thirds of the spill that dissolves in the water or vaporizes during the few days time mentioned?

imP491 (4-3.3) Diluted Bitumen

If spilled dilbit were to remain in the marine environment, the lighter components would evaporate and, as experienced during a 2010 spill of dilbit (the 2010 Enbridge spill in the Kalamazoo River, Michigan), the leftover residue becomes denser than what was spilled initially.1 The responders for the Enbridge spill found that after the oil remained in the environment for a few hours or days, it sank because its composition changed (weathered).2 Oil that sinks below the surface of the water is harder to see and harder to recover.

When the Bakken crude oil is depleted, we can be sure that the facility will be used for the transportation of Alberta Tar-Sands oil. The Imperium DEIS states that some of their tanks will be equipped with a heating system. A heating system is not necessary to get Bakken crude to flow out of a storate tank or a rail car. Sunken spilled oil will sound the death knell for the Harbor's marine resource industry.

Response O20-25

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

Comment O20-26

imP491 (4.3-6) 4.3.2.3 Water Flow

Flow velocities for these flow events in the lower Chehalis River average 1.3 cubic feet per second for the low flow case, 4.0 cubic feet per second for the 2-year flow case, and 4.8 cubic feet per second for the 100-year flow case. These average velocities are influenced by the shallow gradient of the river and the backwater effect of the tidally influenced portion of the river. While these velocities can vary based on the tides, they are typical for a river with similar topography and hydrologic characteristics.

This is an obvious editing error, as the flows are measured in feet per second, and the correct units for this sentence would be: Flow velocities for these flow events in the lower Chehalis River average 1.3 feet per second for the low flow case, 4.0 feet per second for the 2-year flow case, and 4.8 feet per second for the 100-year flow case. The velocities in more understandable units would be 0.88 mph, 2.72 mph and 3.27 mph respectively.

Response O20-26

Cubic feet per second is the standard unit used to measure river discharge and is consistent with U.S. Geological Survey gauging station data presented in this analysis.

Comment O20-27

imP503 (4.4-11) 4.4.3.1 Applicant Mitigation

This section discusses pre-booming. Information from the Washington Dungeness Crab Fishers Association indicates that pre-booming is only feasible approximately 25% of the time. What happens to any connection or disconnection spills during the other 75% of the time? The spills proceed up-river or out to the harbor, and then it's too late to clean up a significant fraction of any spill.

Response O20-27

Prebooming is regulated under Washington's oil transfer rule, WAC 173-184. The rule requires the facility determine and report safe and effective threshold values for conditions beyond which prebooming is unsafe or ineffective. The rule includes prebooming reporting requirements and alternatives measures that must be in place if prebooming is unsafe or ineffective.

Comment O20-28

wwP511 (4.6-1) What are the existing risks?

Year 2014 Vessel calls – per Deputy Executive Director – Port of Grays Harbor
- 15 log ships
- 41 AGP dry bulk carrier vessels
- 6 bulk liquid ships
- 53 RO-RO wheeled vehicle carriers (primarily autos)
- Plus 18 barges (mostly wood chips + wood pulp from Cosmo)

Total 115 deepwater ships = 230 bar crossings--"trips"

The baseline forecast is to reach 338 trips in 2017 and 436 trips in 2037, where will the additional 54 vessels come from in 2015 & 2016?

wwP522 (4.6-12) Vessel Transport Safety in Shipping Channel

- To reduce the risk of an incident during vessel refueling, the applicant will ensure that any tank barges loaded with fuel for purposes of refueling vessels at the project site follow the navigation and safety mitigation measures for crude oil tank barges described in this section.

No prior mention was made of ship refueling (bunkering). These operations are the most likely to cause oil spills, and such spills involve heavy oils (Bunker C), which was the oil spilled in the December 1988 Nestucca Barge spill, killing at least 56,000 birds. Bunkering spills will most likely occur at or near the Port's terminals with the bunkering occurring while the vessel is docked.

A separate section covering bunkering spill containment should be provided, not just a sentence about tug escort of bunkering barges from the bar crossing to the terminals.

wwP523 (4.6-13) 4.6.4 Would the proposed action result in unavoidable and significant adverse environmental impacts related to vessel transport?

A large oil spill or explosion would likely cause unavoidable and significant adverse environmental impacts. As described above, the likelihood of a large spill or related explosion is low; however, the potential for significant consequences to the environment and human health in the case of a large spill or explosion is high. … However, no mitigation measures would completely eliminate the possibility of a large spill or explosion, nor would they completely eliminate the adverse consequences of a large spill or explosion.

Response O20-28

Final EIS Chapter 2, *Proposed Action and Alternatives*, clarifies that proposed operations do not include vessel bunkering (fueling) at the project site. Final EIS Chapter 4, Section 4.6, *Environmental Health Risk—Vessel*, and Chapter 5, *Extended Rail and Vessel Transport*, reflect additional information about federal and state regulations related to bunkering operations.

Comment O20-29

wwP532 (4.7-8 & -9) Sensitive Areas in the Study Area

The U.S. Fish and Wildlife Service designated critical habitat in several areas along the PS&P rail line for the federally listed bull trout (fish) and marbled murrelet (bird), and has proposed critical habitat for the Oregon spotted frog.

The PS&P rail line is also adjacent to three areas of marbled murrelet critical habitat around the Oakville area and is adjacent to proposed critical habitat for Oregon spotted frog near the Black River crossing. An oil spill from a train that reached one or more of these critical habitats could cause adverse effects on survival and reproduction that could further compromise the existing populations.

The Washington State Department of Natural Resources' Chehalis River Surge Plain Natural Area and the U.S. Fish and Wildlife Service's Grays Harbor National Wildlife Refuge are higher quality ecosystems in the study area that support a variety of animals, including several sensitive species.

The PS&P rail line runs along the northern boundary of the Chehalis River Surge Plain Natural Area, and the Grays Harbor National Wildlife Refuge is part of Grays Harbor. An oil spill from a train along this area that would be exposed to animals could result in physical smothering and toxic effects; the resulting impacts would be the same as what has already been described above. In addition, any degradation of habitat in this area from oil could displace uncontaminated animals, possibly causing reduced survival and reproduction as described above. Similar impacts would be expected if a vessel were to spill oil in Grays Harbor that would reach the Grays Harbor National Wildlife Refuge.

As noted in Chapter 3, Section 3.5, *Animals*, Grays Harbor estuary is located along the Pacific Flyway, a migratory flight corridor between Alaska and South America. It is one of four major staging areas for migrating shorebirds in North America, with shorebirds congregating in the mudflats to feed and rest during spring and fall migrations. Approximately 24 species of shorebirds use the Grays Harbor National Wildlife Refuge during migrations, which begin in late April and continue through mid-May.

Not noted in the DEIS's: the Grays Harbor Estuary is a feeding stop for the fall shorebird migration, which begins in July, and continues through October, but not in the concentrations which occur during the spring migration. There are small numbers of shorebirds present throughout the entire year, as a few individuals winter here, and some first year non-breeding birds do not migrate to the Arctic.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for adverse impacts on animals. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill.

There is no way to successfully clean the mudflat at Bowerman Basin. It's classed as a "soft bottom". If there is a spill after the applicant's proposed hiatus in vessel loading, then the returning shorebirds, weak from rearing their young in the Arctic, will not find food here, and will have to attempt to reach the increasingly polluted waters of San Francisco Bay. The study also doesn't mention the usage of the Bottle Beach area (except in reference to the South Bay) and no mention is made of the hordes of birds using "Mini-Moon Island just west of GHNWR near the cross-over channel.

Response O20-29

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes potential impacts of oil spills on resources; it includes sensitive areas along the rail line study area. The discussion of impacts on plants and animals covers death of individual plants and animals, and would apply to any special-status species or its habitat, including critical habitat, Grays Harbor National Wildlife Refuge, and Chehalis River Surge Plain Natural Area.

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification. Potential impacts on resources in the event of a spill, fire, or explosion are addressed in Chapter 4, Section 4.7, *Impacts on Resources*. Final

EIS Section 4.7 has been revised to indicate that the mechanisms for potential adverse impacts also include secondary impacts on shorebirds from loss of food sources. Chapter 4, *Environmental Health and Safety*, acknowledges (in multiple sections) that oils spills are not completely preventable even with the regulatory requirements and proposed mitigation measures that would reduce the risk of an oil spill; Chapter 4 further states that that the potential impacts from an oil spill could be significant.

Final EIS Chapter 3, Section 3.5, *Animals*, reflects the addition of information on Bottle Beach Important Bird Area and the inclusion of Mini-Moon Island in the Bowerman Bay Important Bird Area to note their significance in addition to the other important areas of Grays Harbor that are described in the Draft EIS. The Audubon Important Bird Area program carries no regulatory authority and imposes no legal restrictions or management requirements on any property (public or private).

Comment O20-30

wwP563 (5-18) 5.4.4 Vessel Routes and Destinations

In 2014, 6,815 cargo ships and tankers12 entered Grays Harbor, the Columbia River and Grays Harbor and there were 4,175 tank barge transits (Washington State Department of Ecology 2015:343). Vessels are tracked using automated identification systems required on all large commercial vessels. The Marine Exchange of Puget Sound tracks vessels in Puget Sound, Grays Harbor, and off the Washington coast for 150 miles. The Merchants Exchange of Portland tracks vessels in the Lower Columbia River and off the Washington and Oregon coasts. An example of the transits of large commercial ships tracked along the Olympic Peninsula coast of Washington are shown on Figure 5-8.

This section does not seem to be germane to a study that addresses Grays Harbor. Adding it only increases the "fog factor" of this report.

Response O20-30

Draft EIS Chapter 5, *Extended Rail and Vessel Transport,* addresses potential impacts of rail and vessel transport beyond the study area analyzed in Chapter 3, *Affected Environment, Impacts, and Mitigation*, and Chapter 4, *Environmental Health and Safety*.

Comment O20-31

wwP570 (5-24)

[See original attachment for Table 5-5 Proposed and Operating Facilities Moving Crude Oil by Rail]

Why not mention Imperium? It's certainly foreseeable!

Response O20-31

As stated in the text introducing the table, the table reflects proposed and operating facilities moving crude oil by rail to refineries and terminals outside of the Grays Harbor Study area; the proposed Grays Harbor terminals, including Imperium, are discussed in Chapter 6, *Cumulative Impacts*.

Comment O20-32

wwP574 (5-29) 5.7 Would the proposed action have unavoidable and significant adverse impacts on rail and vessel transport in the extended study area?

However, no mitigation measures would completely eliminate the possibility of a large spill, fire, or explosion from rail cars carrying crude oil or hazardous materials nor would they completely eliminate the adverse consequences of a large spill, fire, or explosion.

Response O20-32

The comment presents text from Draft EIS Chapter 5, *Extended Rail and Vessel Transport*. Final EIS Chapter 5 provides further clarification about potential significant and unavoidable impacts from rail and vessel transport in the extended study area.

Comment O20-33

wwP598 (6-24) Quinault fishers access to T-1

While vessels could occupy the berth up to 100% of the time during the fall fishery, Quinault Indian Nation fishers would not have the option to fish along the dock.

Response O20-33

Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, addresses potential impacts on tribal resources related to routine operation of the proposed action.

Comment O20-34

wwP601 (6-27) Cumulative

6.5.3.4 Unavoidable and Significant Adverse Environmental Impacts

The cumulative projects would affect tribal resources. Implementation of the mitigation measures described above would reduce but may not completely eliminate impacts on tribal resources. More specifically, vessels related to the proposed action would travel through usual and accustomed fishing areas in Grays Harbor. Under current and future conditions, increased vessel traffic could restrict access to tribal fishing areas in the navigation channel or at Terminal 1. This conflict is most likely to occur for fishing related to harvest of salmon, steelhead, and sturgeon. Because other factors besides vessel operations affect fishing opportunities, such as the number of fishers, fish distribution, timing, and duration of fish windows, the extent to which vessel operations related to the proposed action would affect tribal fishing is difficult to quantify. No mitigation measures would completely eliminate the possibility of impacts to fishing resources from vessel operations related to the proposed action.

Response O20-34

The comment presents text from the Draft EIS. Final EIS Chapter 6, Section 6.5.3.4, *Unavoidable and Significant Adverse Environmental Impacts,* provides further clarification.

Comment O20-35

wwP617 (6-34) 6.5.5.4 Unavoidable and Significant Adverse Environmental Impacts

The cumulative projects would have unavoidable and significant adverse impacts on vehicle delay in Aberdeen. The mitigation measures would reduce but not completely eliminate these impacts on vehicle traffic and safety. The vehicle delays would be most severe if a train were to pass by during the peak vehicle traffic hour. However, unavoidable and significant adverse impacts would also result during train transits at grade crossings in the Olympic Gateway Plaza area and between Poynor Yard and the project sites.

Addressing vehicle delay at the grade crossings at the Olympic Gateway Plaza area and between Poynor Yard and the project site would require the participation of a broad group of stakeholders in coordination with ongoing regional transportation planning efforts. Measures to reduce vehicle delay could include modifying PS&P operations to limit switching activities during peak traffic hours, adding new PS&P rail line infrastructure to reduce grade-crossing blockage time, or adding new queue-storage capacity at grade crossings that exceed available storage length. Ongoing regional solutions such as the East Aberdeen Mobility Project could reduce vehicle delay impacts and improve safety conditions at the Olympic Gateway Plaza area. In addition, further regional efforts to evaluate the potential improvements to reduce vehicle delay (such as grade separation, early warning system, grade-crossing protections), would also help to reduce vehicle delay.

Make proponents pay for the grade separation as a condition of approval.

Response O20-35

As stated in Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, "Because of the high cost of grade separation, the number of grade crossings in Aberdeen with substantial vehicle delay (at the Olympic Gateway Plaza and Port of Grays Harbor areas) and the private property and community impacts that would result from grade separation at the crossings with substantial vehicle delay, grade separation in Aberdeen is not a reasonable option to reduce vehicle delay."

Final EIS Section 3.16 clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).

Comment O20-36

wwP624 (6-50) 6.5.6.4 Unavoidable and Significant Adverse Environmental Impacts—commercial

Under existing fishing conditions, increased vessel traffic would cause a disruption when commercial fishers are in the navigation channel. This conflict is most likely to occur related to harvest of salmon, steelhead, and sturgeon during the fall fishery. Although vessel operations related to the cumulative projects are reasonably certain, it is not possible to determine how the proposed action could affect a commercial fisher's daily catch because of other unpredictable factors (number of fishers, fish distribution, timing, and duration of fishing window on any given day of any given week). However, it is anticipated that because there are alternate fishing areas and because there would be additional days/windows to fish uninterrupted, impacts would not be significant.

Response O20-36

The comment repeats the text of the Draft EIS.

Comment O20-37

wwP638 (6-64) 6.5.7.5 Unavoidable and Significant Adverse Environmental Impacts

Impacts from an incident from any of the cumulative projects would likely result in unavoidable and significant adverse environmental impacts. As described in the risk analysis, the likelihood of an incident is low; however, the potential for significant impacts on the environment and human health in the case of an incident is high. The specific impacts would vary based on the location, type of liquid, amount spilled, and weather conditions. Examples of these impacts are described in Chapter 4, Section 4.7, *Impacts on Resources*. Existing regulatory requirements for the prevention, preparedness, and response to an incident and mitigation measures to reduce impacts are detailed above; however, no mitigation measures would completely eliminate the possibility of an incident from rail cars carrying crude oil or hazardous materials. No mitigation measures would completely eliminate the adverse consequences of an incident.

Response O20-37

Comment acknowledged.

Comment O20-38

wwP665 (7-25) Vessel Traffic Community Cohesion

As discussed in Chapter 4, numerous measures and protocols are in place to prevent and minimize the extent of a spill. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would help to reduce the potential for a spill or explosion and adverse impacts on the environment and human health. However, no mitigation measures would eliminate the possibility of a large spill, fire, or explosion, nor would they eliminate the adverse consequences of a large spill, fire, or explosion. These impacts, should they occur, could shape the perception that the communities in the study area are unsafe, unhealthy, or undesirable. These perceptions could affect community welfare whether or not there is a measurable impact on community resources or a substantial increase in risks related to the proposed action.

Response O20-38

Comment acknowledged.

Comment O20-39

wwP668 (7-28) 7.2.5 What mitigation measures would reduce impacts on social policy?

Additionally, increased risks could adversely affect environmental health and safety in the study area. The potential for increased risks during onsite, rail, and vessel operations (e.g., storage tank rupture, train derailment, or vessel collision) and the related environmental consequences (e.g., release of hazardous materials) are addressed in Chapter 4, *Environmental Health and Safety*. As noted in Chapter 4, even with the implementation of mitigation measures, some low risks would remain. Because of the extent of the damage that would result in the event of an incident, these risks would remain unavoidable and significant.

Response O20-39

Comment acknowledged.

Comment O20-40

By reference, I wish to incorporate the comments submitted by Earth Justice, Columbia Riverkeeper, Friends of the Earth, Friends of the Gorge, Washington Physicians for Social Responsibility, Washington Environmental Council, Climate Solutions, Sierra Club, the Lands Council of Spokane, Stand Up to Oil, the Quinault Indian Nation, Friends of Grays Harbor, Washington Department of Fish and Wildlife, and the US Fish and Wildlife Service.

Submitted by:

Arnie Martin
Grays Harbor Audubon Society
631 Chenault Ave
Hoquiam, WA 98550

Response O20-40

Comment acknowledged.

O21, Grays Harbor Audubon Society, Arnold Martin

Comment O21-1

These comments pertain to Westway, but are also germane to Imperium, except as noted. The page numbers without parentheses are from the PDF of the Westway DEIS from the web, the numbers in parentheses are the page numbers which appear on the bottom of the referenced page (PDF or printed)

wwVol 1 P110 (2-7) 2.1.3.1 Proposed Facilities - Storage Tanks

This wording appears: "This containment area, which would be surrounded by a [yellow highlight: 5-foot-tall concrete wall], would have the capacity to contain the total volume of a single tank plus an allowance for precipitation."

At other locations it states that Westway plans on building three 200,000 barrel tanks to start, and then add the two additional tanks. If they do this, they need to decide if they will build the containment area suitable for all 5 tanks, or just build the wall to surround the 3 tanks. A containment wall for 3 tanks would have to be approximately 5/3 as tall as one for 5 tanks.

If they build the containment area for 5 tanks, with a 5 foot height, would they drive the pilings for all 5 tanks, and pour the foundations for all tanks? If they don't do this, they will have to build the impervious clay liner for the entire area, then when they drive the pilings for last two tanks, they will disturb the liner, and will have to build "coffer-dams" around the last two pad areas to protect the liner in case of a leak in one of the 3 original tanks. After the pads are complete, they would have to repair the clay liner.

It is necessary to have the containment areas properly measured and have the calculations submitted for the height of the containment walls – applies to both Westway and Imperium. The

drawings in both of the DEIS's do not include adequate dimensions to provide accurate checks of the height of the containment walls. Note that the plan area of all the unbreached tanks must be subtracted from the total containment area when the height of the containment wall is calculated.

Response O21-1

Draft EIS Chapter 4, *Environmental Health and Safety*, addresses containment. Secondary containment equipment and design features are subject to federal and state regulations. The proposed action would comply with all state and federal regulations for designing secondary containment. The considerations raised by the commenter would be addressed during the detailed engineering and design phase.

Comment O21-2

Having spent some time in an oil refinery, it is apparent that having 3 or even 5 tanks in one spill containment structure is a recipe for spreading a fire that could be contained in a situation where only 2 or 3 tanks are in an individual containment area.

Response O21-2

Draft EIS Chapter 4, *Environmental Health and Safety*, addresses containment. Secondary containment equipment and design features are subject to federal and state regulations. The proposed action would comply with all state and federal regulations for designing secondary containment.

Comment O21-3

wwP112 (2-9)

Onsite Operations: Under the proposed action, the Westway facilities would be capable of unloading one unit train per day, but the applicant plans to receive only one unit train every other day. It seems to me that the facility should be able to handle much more than 50,000 barrels/day and should fall under EFSEC rules. Imperium should also fall under EFSEC as this is not an expansion of their existing facility, but is a different business on an adjoining site.

Response O21-3

The proposed action would increase allowable (permitted) throughput capacity by 751.8 million gallons (17.9 million barrels) of crude oil per year for a facility total of 19.2 million barrels (806.4 million gallons) per year, including existing methanol operations; it would also add a crude oil storage capacity of 42 million gallons (1 million barrels).

The Energy Facility Site Evaluation Council (EFSEC) determined that the proposed action did not fall under EFSEC jurisdiction. On February 12, 2015, EFSEC dismissed a petition filed by the Quinault Indian Nation requesting that EFSEC declare jurisdiction over the proposed action (Council Order No. 14-001).

Comment O21-4

wwP129 (3.1-11)

Probability of Stronger Earthquakes in the Study Area: Table 3.1-2 lists a probability of a greater than 6.0 magnitude quake within a 50 year period and within 50 kilometers of the study area to be 30 – 40%. Limiting the distance to the earthquake focus to 50 km would seem to unduly lower the percentage. If there's a 9.0 quake 100 km away, there will be significant damage in the study area. For an example, use Tokyo during the 2011 Tohuku earthquake, which was 400 miles away. Much of the Grays Harbor local infrastructure is not built to withstand such shaking for the several minutes which was experienced in Tokyo.

Such a critical installation should not be built on 120 feet of dredge spoils at 12 ft elevation above MSL, within 50 miles of the Cascadia Subduction Zone. The intensification of ground motion in filled areas was noteworthy during both the 1989 and the 1906 San Francisco earthquakes.

wwP130 (3.1.12) Liquefaction:

The Port of Grays Harbor has stated that the potential for liquefaction is low at the Imperium site, as the bank of Fry Creek is rip-rapped and other areas close to the Terminals are protected by sheet piling. The peak accelerations during the 2011 Tohoku earthquake were measured at 2.99 g. There is no rip-rap that is installed in the Terminal areas where its base is not on sandy soil. The base of the rip-rap will collapse, along with the entire bank armoring, leaving the area next to Fry Creek subject to extreme lateral spreading and potential collapse of the rail siding, the containment wall, and perhaps a failure of the tank supports.

Response O21-4

The 50-kilometer radius basis for earthquake probabilities in the study area presented in Table 3.1-2, in Draft EIS Chapter 3, Section 3.1, *Earth*, is a function of the tool presented for public use by the U.S. Geological Survey. While earthquakes of similar magnitude could occur at distances greater than 50 kilometers, the intensity at the project site would reduce with distance from the epicenter. The Draft EIS considers the impacts related to a large earthquake, and smaller events are considered by inclusion in the consideration of the larger and more intense seismic event. Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment O21-5

wwP131 (3.1-13) Co-Seismic Subsidence:

The possibility of co-seismic subsidence of perhaps 2 meters will render the entire site subject to flooding at spring tidal states and with sea-level rise, the entire site will become unusable. Why would a prudent corporate board spend many tens of millions on building terminals on such sites?

Response O21-5

Final EIS Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* recognizes that the proposed facility may not be operational following the occurrence of a large seismic event.

Comment O21-6

wwP581 (6-7) Criteria Pollutants

The maximum cumulative nitrogen dioxide (NO2) concentrations would occur if the following actions occurred simultaneously.

- The applicant is loading a vessel at the terminal while operating the vapor combustion unit at maximum capacity.
- Imperium Terminal Services is unloading crude oil from a unit train.
- USD Group LLC is loading crude oil at Terminal 3 and unloading a unit train.

Under these circumstances, the highest concentration of 1-hour NO2 could occur resulting in an increase of NO2 concentration that would slightly exceed the 1-hour NO2 standard.

Actually it would be higher if Westway was simultaneously loading a vessel and unloading a train. But that would also have to have all the other scenario levels of low windspeed, strong temperature inversion, and also a 1-hour background NO2 at maximum level, all present. Similar logic also applies to Imperium simultaneously unloading railcars and loading a vessel, while Westway is unloading crude oil from a train.

Response O21-6

Comment acknowledged. The scenario analyzed in Draft EIS Chapter 6, *Cumulative Impacts*, was selected as a reasonably foreseeable conservative estimate.

Comment O21-7

wwP647 (7-7) Operations

At full buildout, the proposed action would generate an estimated 36 direct jobs in Grays Harbor County associated with onsite operations (by the applicant), rail transport (by PS&P), and vessel transport (by vessel operators).

Since there are no vessel operators based in Grays Harbor County, counting those jobs violates the boundaries of the study area and should not be counted as direct jobs. The longshoremen jobs might be countable, even though most of them likely come from Tacoma. The cost benefit study for the city of Hoquiam states that there will only be 15 direct jobs at the terminal. Similarly, Imperium is claiming 20 direct jobs at their terminal.

Response O21-7

The analysis assumes that workers would overwhelmingly reside close by, and this assumption is supported by U.S. Census data indicating that over 95% of employees working at businesses in Grays Harbor County also live in Grays Harbor County.

Comment O21-8

wwP672 (7-32) Cost Benefit Analysis (to Hoquiam) Westway

Onsite: Assuming all direct jobs in Grays Harbor County would be located in Hoquiam and Aberdeen (excluding vessel and rail transportation direct jobs), it is possible to estimate the number of

operations jobs filled by workers who reside in Hoquiam. Assuming each job is filled by one worker, and using the same U.S. Census Bureau commuting pattern estimates used to analyze construction jobs, between 23 and 27% of direct operations workers would reside in Hoquiam. This would correspond to 3 to 4 workers (from a total of 15). A share of the indirect and induced employment could also occur in Hoquiam. ECONorthwest (2014) estimated that each direct onsite job would pay approximately $65,000 a year in total compensation (wages and benefits). Under this assumption, total labor income in Hoquiam, supported by operational jobs directly linked to the proposed action, would correspond to between [green highlight: $195,000 (3 multiplied by $65,000) and $260,000 (4 multiplied by $65,000)], assuming a full build-out (after Phase 1 and Phase 2 construction).

Response O21-8

Comment repeats text from the Draft EIS.

Comment O21-9

By reference, I wish to incorporate the comments submitted by Earth Justice, Columbia Riverkeeper, Friends of the Gorge, Washington Physicians for Social Responsibility, Washington Environmental Council, Climate Solutions, Stand Up to Oil, the Quinault Indian Nation, Friends of Grays Harbor, Washington Department of Fish and Wildlife, and the US Fish and Wildlife Service.

Submitted by:

Arnie Martin
Grays Harbor Audubon Society
631 Chenault Ave
Hoquiam, WA 98550

Response O21-9

Comment acknowledged.

O22, International Union of Operating of Engineers, Local 302, Josh Swanson

Comment O22-1

Name: Josh Swanson
Organization: International Union of Operating Engineers, Local 302
City/ State/ Zip: Bothell, WA 98011

We support both of these expansion projects. These projects equate to good family wage jobs to build these facilities. Rail is safe & if further safety implements were needed to ensure public safety that can be done as well.

Our members live & work in the community & would not support anything that harms their own community. These projects bring jobs for an economy that needs it to sustain itself—they are not dangerous or unsafe.

It is extremely frustrating to see outsiders to this community come here to tell us that these needed projects should not be done.

We will submit additional more formal comments in writing.

Josh Swanson

Political & Community Representative

Response O22-1

Comment acknowledged.

O23, International Union of Operating of Engineers, Local 302, Josh Swanson

Comment O23-1

My name is Josh Swanson, S-W-A-N-S-O-N. I'm the political and communications representative for the International Union of Operating Engineers, Local 302.

I'm just here in full support of both the Westway and Imperium Expansion Projects primarily for the good family wage paying jobs that they'll bring to this local economy, and we will be submitting additional comments in writing about the specifics, but at this point, we just want to go on record as being in full support. Thank you.

Response O23-1

Comment acknowledged.

O24, Lake Pond Oreille Waterkeepers, Shannon Williamson

Comment O24-1

Dear Washington Department of Ecology and City of Hoquiam: Thank you for considering Lake Pend Oreille Waterkeeper's comments regarding the Draft EISs for the Westway and Imperium oil terminal proposals. Lake Pend Oreille Waterkeeper (LPOW) is a non-profit organization located in Sandpoint, Idaho that works to protect the water quality of Lake Pend Oreille and its associated waterways so that they remain swimmable, fishable and drinkable for future generations.

Lake Pend Oreille is located in Bonner County, (North) Idaho, a region that is becoming increasingly impacted by the transport of fossil fuels by rail including coal and crude oil. The findings in the DEISs for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train traffic, air pollution, noise, and vehicle delay at railroad crossings cannot be fully mitigated and the environmental damage could be significant. There is simply too much risk and too little reward from these proposals. North Idaho communities would take on the risk and oil companies would reap the profits. North Idaho is particularly vulnerable to the threats posed by increased oil by rail train traffic. Sandpoint, Idaho is a choke-point for rail traffic traveling west.

All trains carrying Bakken crude oil and Canadian tar sands must pass through Sandpoint on their way to refineries in Washington. This puts our community at extreme risk. Sandpoint already

experiences approximately 60 trains traveling through the city each day. While an increase of 12 full and 12 empty trains per week that would result from approving the current proposals does not sound extreme, the cumulative impact of all oil by rail and coal export terminal proposals would be devastating for our community. North Idaho is home to an array of spectacular natural resources including the largest lake in Idaho, Lake Pend Oreille. Oil trains already threaten the integrity of our water quality by traveling directly adjacent to and over the lake on a daily basis. A dramatic increase in oil by rail traffic increases the probability of a disastrous derailment that would pollute a near-pristine water body that is used for numerous recreational activities and drinking water by thousands of residents and visitors. The lake is also home to a diverse community of aquatic and terrestrial wildlife that anglers and hunters rely on.

The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line from North Dakota to Washington.

North Idaho has everything to lose and nothing to gain from the proposed Westway and Imperium oil terminal proposals. There are better way to meet our energy needs. Our country as a whole is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming. Building more, big infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for the North Idaho and the entire northwest. I urge you to do everything in your power to stop these dirty and dangerous projects and reject the proposed Westway and Imperium oil terminals. Thank you for your consideration of these comments. Sincerely, Shannon Williamson, Ph.D. Executive Director Lake Pend Oreille Waterkeeper.

Response O24-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

O25, League of Women Voters, Peggy Benton

Comment O25-1

Thank you. My name is Peggy Benton. I live in Olympia. I was asked to speak for the League of Women Voters for Washington. I'm the chief advocate for the issue of energy transportation, and our president will be submitting a written statement.

I'd just like to make a couple of observations. Well, for one thing we—like all of the other previous speakers, we believe the permits must be denied.

And we also believe this comment period should be extended because several others have observed there are a great number of people who are just finding out about this and need time to study this.

This has such a huge impact, and it—really there's not—the period isn't long enough. It should be at least another month, another 30 days at the end of October.

Response O25-1

Pursuant to WAC 197-11-455, the lead agency for a SEPA proceeding shall provide 30 days for review of and comment on a Draft EIS. This may be extended by 15 days upon request. The co-lead agencies issued an extended 60-day comment period that was then extended to 90 days based on public requests to provide additional time for review and comment.

Comment O25-2

And then, I also just like to make an observation about the section on cumulative impacts. It does talk about the impact--the potential impact on global climate change.

But it seems to me—and I agree with the person who spoke earlier that it isn't the best written document that I have ever seen. But there is—It would appear to me that it minimizes the potential additional increments to the carbon footprint on the basis that—a couple of things, that oil exports are prohibited by law and the capacity of refinery is limited by law.

And of course this seems to me absurd to bring up since, as others have pointed out, these laws are under very, very serious attack and probably not sound.

Thank you very much.

Response O25-2

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, acknowledges that greenhouse gas emissions from the cumulative projects would contribute to global greenhouse gas emissions, which contribute to climate change, and describes the projected impacts of climate change in the Pacific Northwest.

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts,* present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. In responses to comments, The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination.

Based on the crude market analysis conducted for this Final EIS, crude oil transloaded through the proposed facility would likely be transported to West Coast refineries despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

O26, League of Women Voters, Mary Moore

Comment O26-1

The League thinks that the protection of the marine environment should be the prime consideration when decisions are made regarding the movement of crude oil into or through the state of Washington. Protection of land areas through which a pipeline or other transportation method might pass is also of concern. We are opposed to the efforts of Westway and Imperium and think that the Department of Ecology and the city of Hoquiam should act accordingly to refuse access for the depots.

Response O26-1

Comment acknowledged.

O27, League of Women Voters of Bellingham Whatcom County, Jayne Feudenberger

Comment O27-1

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

The League of Woman Voters of Bellingham/ Whatcom County would like you to consider denying all permits for more fossil fuel activity in the Grays Harbor area.

There is no way to mitigate the impacts of an oil spill in this area. Five years after the Gulf oil spill over a dozen different species of wildlife are still being impacted by the spill--from dolphins to oysters. Giant tar balls still coat the barrier islands; the oil that slimed the mangrove trees have caused them to die thus hastening the disappearance of these islands which helped protect the mainland from storms.

Response O27-1

Comment acknowledged.

Comment O27-2

The Grays Harbor area saw almost 15,000,000 tourism trips in 2012 alone which gave their economy $15.9 million annually. The annual average harvest of non- tribal fisherman netted $39,738,222 dollars to the local economy with the Quinault tribe fisheries earning another $9 million. Imagine the impact of one oil spill. Adding these three projects to the locality means it would not be—if there is a spill—but when. Looking at your own modeling, the chance of a spill from any of

the projects and the rail lines is much too great to take a chance. The hit to the local economy and the jobs lost would be horrifying.

Response O27-2

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O27-3

Furthermore, now at a time when we are finally recognizing that Climate Change is real and mostly man made why would we continue on this path to annihilation? It is time for investment into clean energy-not to provide an easy way for corporate need to triumph over the common good.

Please consider both the short term and long term effects of permitting these projects to go forward.

Jayne Freudenberger Co-President
LWV of Bellingham Whatcom County

Response O27-3

Comment acknowledged.

O28, League of Women Voters Thurston County, Patricia Dickason

Comment O28-1

October 16, 2015

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

The League of Women Voters of Thurston County writes to oppose granting the requested permits for construction of Grays Harbor oil terminals, based on the recently released Environmental Impact Statements (EIS). The League is a non-profit membership organization which neither supports nor opposes candidates or parties; League works to strengthen election systems. League also develops positions in multiple public policy areas, using them to advocate for public policy outcomes.

League positions support policies to assure the safety of communities, protect public health, maintain environmental quality, protect streams and estuaries, and reduce ambient and trans-boundary toxic air pollutants and greenhouse gas emissions. Based on these positions, we are concerned that the Grays Harbor EIS concludes that many risks cannot be fully mitigated. We are particularly concerned about the EIS conclusion regarding the contamination risk to Olympia's water supply should an oil train shipment on the rail lines near this water supply source derail or spill.

League is also concerned about the projects' identified risks such as: vehicle traffic delays, tsunamis, air pollution, major train accidents, oil spills, water contamination, fires and explosions, health

impacts of noise and vibrations, and the likely impact on the global climate footprint of these proposed projects.

We suggest that policymakers at all levels of government need to be aware of the ever more urgent warnings of atmospheric scientists that there is no time to waste in reducing the carbon footprint if there is to be any hope of avoiding the most serious consequences of global climate change - that is, an earth that can no longer support human civilization.

Given these and the other well-founded concerns about the oil terminal proposals, League urges that the requested permits be denied. The risks are simply too high.

Thank you for the opportunity to comment.

Sincerely,

Patricia Dickason, President
League of Women Voters of Thurston County

Response O28-1

Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses potential impacts from construction and routine operation of the proposed action, including tsunamis, air pollution, water contamination, noise and vibration, and vehicle delay, in Sections 3.1, *Earth*, 3.2, *Air*, 3.3, *Water*, 3.7, *Noise and Vibration*, and 3.16, *Vehicle Traffic and Safety*. Climate change is addressed in Chapter 6, *Cumulative Impacts*. Increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) and potential consequences (e.g., release of crude oil) are addressed in Chapter 4, *Environmental Health and Safety*. Section 4.7, *Impacts on Resources*, describes the general types of impacts that could occur as a result of an oil spill, fire, or explosion. Chapter 7, Section 7.3.4.2, *Initial Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

O29, Multiple Organizations

Comment O29-1

Nov. 27, 2015

Honorable Ladies and Gentlemen:

Washington State's delicate coastal ecosystem is facing an urgent and new threat: the fossil fuel industry has discovered our coast, not for its sandy beaches, incredible razor clams or delectable Dungeness crab and iconic salmon, but rather as a future highway to bring coal and crude oil into our counties, along our rivers, around our estuaries, and into our ocean waterways on its way offshore or to already over-capacity refineries. The danger this poses in terms of spillage and pollution cannot be overstated.

As you are undoubtedly aware, Washington State's Coastal Marine Resources Committees (MR.Cs) were formed to address local marine issues; promote ecosystem resilience through research, education, community engagement and advocacy; and to serve as stewards for the marine and

estuarine resources of our area. Each committee addresses the specific issues related to the irreplaceable assets of their unique area. As members, we contribute to the Marine Spatial Planning efforts for the State of Washington and participated in our local and regional Shoreline Master Programs updates. Water, habitat, and marine resources are what we know and what we passionately strive to sustain.

As a group, the MRC membership is a balance of those who live, work and play on our ocean coast and estuaries. The MRCs represent a diverse group of stakeholders from all along the coast, comprised of governmental and educational representatives, as well as advocates for fishing, recreational, agricultural, cities', scientific, port and aquaculture interests. Representation on the MR.Cs also includes staff from the coastal treaty tribes including the Quinault Indian Nation and the Quileute, Hoh and Makah Tribes. The tribes are critical participants in our committees and our communities due to the long tribal history of the coast, their treaty fishing rights protected by the U.S. government and the tribes' strong mandates to protect the environment for generations to come. This balanced membership supports environmentally responsible new development and especially those that are water dependent.

However, we as an alliance of the coastal MR.Cs and concerned citizens, feel very strongly that incompatible development should not go forward.

There are currently five proposed crude by rail projects in Central and Southwest Washington. Imperium “Renewables, “Westway Terminals and Grays Harbor Rail Terminal, LLC are exploring permitting in Grays Harbor. Riverside Refinery is looking to locate in Longview, Washington and Vancouver, Washington is faced with proposals from NuStar Energy and Vancouver Energy.

If all of these proposals were to be permitted, the carbon footprint of our state would be increased by 185.5% over its present levels. Nearly 24,360,000 gallons of crude oil per day would roll inon 105-125-car unit trains. A proposal at Anacortes would add 2,570,400 gallons to the total.

In just the proposals affecting Grays Harbor alone, 2.7 billion gallons of crude oil would be transported along the Columbia River Gorge on its way to Centralia where it would then switch to the Puget Sound and Pacific short-line, owned by Genesee & Wyoming. En route to the Hoquiam terminals, these over one-mile-long unit trains would cross 100 streams, rivers, creeks and tributaries, most of which are fish-bearing.

The Tesoro Savage Oil Terminal in Vancouver would transport 15,960,000 gallons of crude oil a day. It is the largest oil terminal project among the several proposed in the Northwest.

We view these crude oil proposals as a direct threat to our livelihoods, our quality of life, and the economic viability of our tribal partners and ourselves. These projects represent incompatible and inappropriate development along our shorelines and waterways. We hope you will join together with us to oppose the permitting of any crude oil transport and storage along our ocean coasts and estuaries, and advocate with us for sustainable energy solutions that will allow our coastal region to thrive now and for future generations.

Sincerely,

Casey Dennehy, Surfrider Foundation, Grays Harbor County MRC Chair, member of Washington Coastal Marine Advisory Council (WCMAC)

Arthur (R.D.) Gnmbaum, Grays Harbor County MRC Member, WCMAC member Al Carter, Member, Grays Harbor County MRC Member

Joe Schumacker, Grays Harbor County MRC Member, Quinault Indian Nation Representative Shad Kearse, Grays Harbor County MRC Member
Micheal Spencer, Pacific County MR.C Member
Dana Sarff, North Pacific Coast MRC Member, Makah Tribe Representative on behalf of the Makah Tribe
Jill Silver, 10,000 Years Institute, North Pacific Coast MRC Member
Steve Allison, North Pacific Coast MRC Hoh Tribe Representative, Hoh Tribe Natural Resources Department
Tami Pokorny, North Pacific Coast MRC Jefferson County Representative, Jefferson County Environmental Health Department, WCMAC Member
Paul McCollum, Prince William Sound Regional Citizens' Advisory Committee (PWSRCAC) Doug Kess, Pacific County Marine Resources Committee, WCMAC Member
Mike Nordin, PCMRC
Brian Sheldon, PCMRC, WCMAC Member Tom Kollasch, PCMRC
Key McMurray, PCMRC
Dale Beasley, PCMRC, WCMAC Member Lorena Mauer, GHMRC
Marie Plackett, GHMRC, WCMAC Member

Response O29-1

Comment acknowledged.

O30, Nisqually Aquatic Reserve Stewardship Committee, Daniel A. Hull

Comment O30-1

Nisqually Reach Aquatic Reserve
Citizen Stewardship Committee

4949 D'Milluhr Dr NE
Olympia, WA 98516

Attention Co–Lead Agencies; City of Hoquiam Administrator Brian Shay, and
Washington State Department of Ecology Director Maia Bellon

The following statement reflects the opinions of public citizens affiliated with the Nisqually Reach Aquatic Reserve Citizen Stewardship Committee NRAR CSC and is not endorsed by the Washington State Department of Natural Resources.

We are environmentally concerned citizens who are members of the Nisqually Reach Aquatic Reserve Citizen Stewardship Committee; we take action by educating hundreds of school children each year, training volunteers to be citizen scientists, engaging the public during outreach events, and commenting on regulatory changes. We care so much about the Nisqually area, which is such a special and unique place that we collaborated with the Washington State Department of Natural Resources and other organizations to form an aquatic reserve to protect this area for many generations to come. This aquatic reserve was created with the express purpose of environmental protection, enhancement, and restoration. We are proud of this achievement that we worked tirelessly to accomplish and we will protect it now and in the future. The Nisqually Reach Aquatic

Reserve Citizen Stewardship Committee is gravely concerned about the proposed crude oil by rail projects proposed for Grays Harbor because of the risks to people and the environment.

Who are we to concern ourselves with the health of the environment, let alone an issue that doesn't directly affect us? We are a diverse and vibrant community of families, veterans, hunters, anglers, boaters, Native Americans, and shellfish farmers. We love all natural places where we can enjoy the many activities that natural places can give us.

Although Grays Harbor is far away from the Nisqually and does not share the aquatic reserve designation, it shares the traits of social and recreational importance. People of all ages enjoy the beach, but if spoiled by an oil spill, nobody is able to enjoy the beach while recovery occurs over the course of months, years, and possibly decades. The effects of an oil spill in the marine environment can leave long lasting damage as in the case of Exxon Valdez for example. One of the more recent major ones, Deepwater Horizon, is another of numerous instances in which safety was not top priority; as a result, the impact extended well beyond the immediate loss of lives that occurred during the explosion and subsequent fire. The effects of the disaster were so widespread that the economic impact affected not only an entire subsector of the oil industry, but it also shut down fishing and aquaculture in a very large area and put people out of work. To this day, the lasting effects have not yet been completely studied and quantified. Additional oil facilities go against three of your own strategic priorities, which specify to reduce and prepare for climate impacts, prevent and reduce toxic threats, and protect and restore Washington's environment.

Response O30-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment O30-2

Grays Harbor has significant value in various facets, not the least of which is its natural beauty. People from all over the United States come to see the great bird migrations to both Grays Harbor

and the Nisqually National Wildlife Refuge. It is one of the top visitor destinations here in the Olympia area and arguably our crown jewel. Bowerman Basin, a unit of the Nisqually National Wildlife Refuge and equally special in its own right, is a very popular recreational site that attracts thousands of visitors each year and hosts an annual shorebird festival due to its tremendous importance as a major staging area on the Pacific Flyway for migratory birds. This site is downstream of the project site and would be at risk of contamination in the event of an oil spill. Many of us visit this area to observe the wildlife.

Response O30-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations, including the requirements for containment, and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including the resources identified in the comment.

Comment O30-3

Grays Harbor is also important to out-migrating juvenile salmonids that utilize the estuary for feeding, rearing, and as a place to acclimate to saltwater. Returning adult salmon also utilize the area to acclimate to freshwater. Essential fish habitat for Chinook and Coho would be negatively impacted. The undeveloped areas of shoreline are primarily mudflat and salt marsh that are the most sensitive to oil spills.

Response O30-3

Potential impacts on salmonids in the study area are addressed in Draft EIS Chapter 3, Section 3.5, *Animals*, and Chapter 4, Section 4.7, *Impacts on Resources*. Final EIS Section 3.5 clarifies that Grays Harbor provides essential fish habitat for Pacific salmon, including Chinook and coho.

Comment O30-4

These areas are difficult to clean up due to the unique hydrology and geography of the area that combines in such a way that oil can spread far and wide rapidly, especially in the winter time during periods of strong wind, heavy rain, and spring tides. If a large oil spill were to occur in Grays Harbor, the environmental impacts would be extremely difficult to limit and contain because of strong water currents.

If a train were to derail and explode, the consequences could be potentially catastrophic. Some sections of rail line intersect or run less than a half mile parallel to busy highways. A major shopping area is immediately adjacent to the rail line in Aberdeen.

If these facilities are permitted to operate, how long will it be before the next derailment? More trains running will cause the tracks to deteriorate more quickly. How much usage can these tracks handle between scheduled maintenance? What steps are being taken to improve the safety and

durability of the tankers and the rails they run on? Are these measures adequate to meet or exceed safety standards?

It is very alarming that the spill containment area surrounding the storage tanks is sufficient only to contain the entire contents of the largest tank. What is the contingency plan for an accident involving multiple tanks? How quickly can a spill response team contain this volume of oil entering the waterway? Mitigation for a large spill is not feasible; the damage would be irreparable.

Response O30-4

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. For these reasons, Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, in general terms.

Comment O30-5

The entire area along the PS&P rail line is susceptible to liquefaction in the event of an earthquake magnitude 6.0 or greater. That in and of itself ought to be reason enough not to store large volumes of crude oil in a relatively small area. The project site itself is shown to be within the tsunami inundation area. Although the likelihood of such scenarios is discussed, there is no mention of what degree of damage would result.

Response O30-5

Draft EIS Chapter 3, Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment O30-6

All ramifications should be completely and satisfactorily addressed before considering the issuing of permits for oil storage and refinery facilities. This place is so beloved by many for its natural wonders that it is truly priceless. It is irreplaceable and would be permanently marred by an oil spill. The environmental, human safety, economic and emergency response risks are too considerable to ignore.

There are wiser ways to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming. Building more big infrastructure for fossil fuels is the wrong way to meet current and future energy needs and a big economic misstep for Washington. Washington State should continue

to be a leader in safe, renewable clean energy solutions and eliminate reliance on polluting fossil fuels. We urge you to do everything in your power to deny these polluting and dangerous projects.

Thank you for your consideration of these comments.

Sincerely,
Daniel A. Hull
NRAR CSC Chair
360-790-0547
nrnc@nisuallyestuary.org

Response O30-6

Comment acknowledged.

O31, Northwest Steelheaders Association, Michael O'Leary

Comment O31-1

Thank you for being here and thanks for taking your time to listen. I think outside, the printed material that's already been set forth, it's not enough. My name is Michael O'Leary. And I'm here representing the Northwest Steelheaders Association. I represent Clark, Cowlitz, Pacific, and all the way up the Columbia River Basin.

I drove from Portland, Oregon tonight. We have to tell you, from where we live your process here is extraordinarily flawed, because you didn't have us, what we think about oil trains coming down the Columbia River.

I was at a hearing in The Dalles, Oregon this June when Ecology rolled out their spill response plan. When the Army Corps of Engineers stood up and said, of course if there is a spill of one drop of oil into the fisheries at the dams, those fish, because their olfactory, sense of smell, is so sensitive they will not use the fish ladders any more.

And, by the way, we can't fix it, because they are encased in concrete. We don't have a pipe cleaner that can fix those fisheries. The Army Corps of Engineers said it's going to be the case if a drop of oil spills into the fisheries.

You didn't ask The Dalles, you didn't ask Hood River, you didn't ask Pasco, you didn't ask Pendleton, you didn't ask Umatilla, you didn't ask Portland. Oil terminals here put fish at risk all the way through our basin.

And if you remember June and July and those fish kills that we had, we have a lot of problems probably increasing on the horizon. We don't need one like this. We don't need oil exports. Thank you.

Response O31-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for

the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

O32, Olympic Forest Coalition, Connie Gallant

Comment O32-1

Olympic Forest Coalition

Promoting the protection, conservation and restoration of natural forest ecosystems and their processes on the Olympic Peninsula, including fish and wildlife habitat, and surrounding ecosystems

November 17, 2015

The Olympic Forest Coalition (OFCO) promotes the protection, conservation and restoration of natural forest ecosystems and their processes on the Olympic Peninsula. This mission includes monitoring and caring for the rivers, streams and bays of the Peninsula and for the wildlife species that call the Olympic forests home, including listed species such as the Marbled Murrelet.

OFCO has grave concerns about this project, and believes the "no action" alternative should be selected.

The products that would be shipped by rail to these proposed facilities – volatile Bakken crude and toxic tar sands—would present unique dangers to public health and the environment. These risks are real, as evidenced by the Lac-Mégantic oil train disaster in Quebec that killed 47 people in early July of 2013. We also remember the devastation of the Exxon Valdez oil spill in Alaska, and the 1989 Nestucca oil barge spill off Grays Harbor that ruined beaches from Oregon to Vancouver Island, and killed 56,000 seabirds. Clearly, there could be no significant mitigation in the event of a spill or accident—even if the rail carriers maintained sufficient insurance coverage for all possible responses.

Response O32-1

Refer to the Master Response for Geographic Scope of the EIS. Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions in the study area related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. For these reasons, Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, in general terms.

Comment O32-2

The projects in question pose significant and irremediable risks to the forest ecosystems we seek to protect, and to the wildlife species that make their homes in these ecosystems. Of particular concern

to us is the Marbled Murrelet, whose numbers decline each year. Increasing oil traffic in coastal waters would compound threats to the survival of this population.

Response O32-2

Impacts on marbled murrelets from the proposed action area covered in Draft EIS Chapter 3, Section 3.5, *Animals*, and Chapter 4, Section 4.7, *Impacts on Resources*.

Comment O32-3

Moreover, the increment to the global carbon footprint these projects would likely effectuate would work to eliminate all vestiges of hope for survival of human civilization, in our region and elsewhere on the planet. The argument made in the DEIS that the oil processed in the proposed facilities is likely not to add appreciably to the global carbon footprint (because laws prohibit its export and thus it would supplant existing domestic supplies) is not credible, since the export ban faces heavy and growing pressure for repeal.

Thank you for your attention to our comments.

Connie Gallant
President

PO Box 461 Quilcene, WA 98376-0461 (360) 710-7235
www.olympicforest.org info@olympicforest.org

Response O32-3

Based on the crude market analysis conducted for this Final EIS, crude oil transloaded through the proposed facility would likely be transported to West Coast refineries despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion and Final EIS Chapter 5, *Extended Rail and Vessel Transport*.

O33, Oregon Interfaith Power and Light, Jenny Holmes

Comment O33-1

Dear Washington Department of Ecology and City of Hoquiam: Religious leaders and people of faith around the Northwest are opposed to oil-by-rail projects and fossil fuel terminals that are built on unstable land in populated areas, and that contribute to climate disruption. The Westway and Imperium oil terminal proposals for Grays Harbor, Washington are not good stewardship of our communities, land, water, and climate. We know we can do better. The recent crude oil train derailments and oil spills across North America underscore the high level of danger that oil transport brings to Northwest communities and waterways. These accidents impact people's lives, as seen with the deaths of 47 people in the tragic Lac-Megantic, Quebec accident, homes, schools, jobs, and drinking water. Trains delivering oil to the Westway and Imperium proposed terminals travel, in part, along the Columbia River- a great concern to both Oregon and Washington residents. Our communities on the train route can't afford an oil spill or explosion. The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. We support

protection of Grays Harbor and its people, and urge you to use the analysis and findings in the DEISs to reject these oil shipping terminals. Sincerely, (see attached document for congregations, zip codes, contact info for signatories below) Jenny Holmes, Organizer, Oregon Interfaith Power and Light Kelly O'Hanley Margaret MacGregor Pamela Allee Jeff Stookey Harriet Edith Roberts Alice Suter Letty Phillips Stuart R. Shaw Don Merrick Lucinda Hites-Clabaugh Tricia Zigrang Rose Christopherson Jane Jones Jan Zuckerman Roberta Badger-Cain Heather Moline Tyler Wagner Alison Warren ATTACHMENT 1: Signatures of Oregon People of Faith Against Westway/Imperium Oil Terminal Expansion Kelly O'Hanley Rosell City Park Presbyterian 97213 kohanley@gmail.com Margaret MacGregor First Congregational UCC 97215 margaret.portland.rose@gmail.com Pamela Allee First Unitarian Portland 97203 alleepa@gmail.com Jeff Stookey Dharma Rain Zen Center 97232 jstookey108@gmail.com Harriet Edith Roberts Church of the Brethren 97403 hroberts@uoregon.edu 541-687-5648 Alice Suter St. Michael and All Angels Episcopal 97212 ahardesty88@comcast.net Letty Phillips St Michael & All Angels Episcopal Church 97202 Stuart R. Shaw United Methodist 97304 stubonshaw@comcast.net Don Merrick West Hills Unitarian Universalist Fellowship 97223 dlm.6@juno.com Lucinda Hites-Clabaugh Forest Grove United Methodist Church 97116 frodohc@hotmail.com Tricia Zigrang St Francis of Assisi 97225 tazigrang@yahoo.com Rose Christopherson Augustana Lutheran Church 97231 rose.christopherson@comcast.net Jane jones St. Michael & All Angels 97239 triplejjj34@gmail,com Jan Zuckerman Havurah Shalom 97212 zuckerez@hotmail.com Roberta Badger-Cain First Presbyterian Church, Portland 97202 emilysing@aol.com Heather Moline St. Andrew Catholic Church 97211 hmoline@gmail.com Tyler Wagner St. Ignatius Catholic Church 97202 thwagner213@gmail.com Alison Warren Portland Mennonite Church 97203 alkyson@gmail.com

Response O33-1

Comment acknowledged.

O34, Oregon Physicians for Social Responsibility, Regna Merritt

Comment O34-1

November 30, 2015

Oregon Physicians For Social Responsibility (OPSR) Comments on Imperium and Westway DEISs

To Whom It May Concern:

Thank you for the opportunity to comment on Imperium and Westway DEISs. OPSR presented oral comments at the Aberdeen hearing and now submits written comments because of our great concern about the serious health, environmental, and societal risks posed by these proposed projects.

We concur with and incorporate by reference the comments of Washington Physicians for Social Responsibility (WPSR) on this matter.

We support WPSR's detailed discussion of the health risks not sufficiently addressed by the DEISs for the following threats:

- Tsunami overtopping of tanks;
- Air pollution from locomotive engines and terminal operations;

- Fires triggered by terminal accidents and train derailments;
- Oil spills that threaten drinking water and primary food sources;
- Vehicle traffic delays, including emergency response vehicles;
- Noise from trains; and
- Climate change.

Response O34-1

Refer to specific responses to comments from the Washington Physicians for Social Responsibility.

Comment O34-2

Additionally, we request that you address the following concerns in the final EIS.

Noise and Vibration:

Noise from trains, especially from the sounding of horns at crossings, presents a particular challenge to health. Trains horns are sounded at a range known to disturb sleep and to trigger health and mental health issues. Increased cardiovascular events including myocardial infarction and arrhythmia are associated with nighttime noise and noise greater than 90 decibels (in the range of train horns). Children exposed to noise have exhibited adverse cognitive performance and increased psychiatric illness. Noise exposure increases the risks of cardiovascular disease, including increased blood pressure, arrhythmias, stroke and ischemic heart disease; cognitive impairment in children; sleep disturbance and resultant fatigue, hypertension, and increased rates of accidents and injuries; and exacerbation of mental health disorders such as depression, stress, anxiety, and psychosis. Furthermore, the adverse effects are worse when there is no control over the noise. Negative perceptions about the noise will exacerbate these problems.

The DEIS's analysis uses a 24-hour average noise level for residences, hospitals, and hotels (places where people sleep), even with a 10-decibel adjustment for night noises. Use of an average is inadequate as it minimizes the adverse impacts when comparing the "No Action Alternative" with the proposed project's impacts, and minimizes the adverse impacts of intermittent high impact and/or unexpected noise. There is no consideration of the extra adverse effects of intermittent high impact noise, such as in pile driving, which includes a fright component that adds to increased stress levels. The DEISs appear to make the assumption that living 1/4 to 1/2 mile away will mitigate the health and environmental impacts of noise. This is not correct: it would depend on what exists between the noise source and the person hearing the noise. For example, if there is open water or there are hills in the area, the noise could be magnified.

We agree with WPSR that attempting to mitigate for increased train noise presents a no win situation. The only mitigation measure suggested in the DEISs is the development of quiet zones. These are very expensive (the costs are usually borne by taxpayers) and they essentially substitute one problem for another. A quiet train that does not sound a horn puts people at risk of collisions and serious accidents.

According to DEISs documents, the level of train noise disturbance is estimated to be of special concern for Elma-Satsop residents. Is this community to be a sacrifice zone? This adds to our deep concern that vulnerable populations will be disproportionately impacted by these projects. It also raises concerns that precaution and prevention of adverse impacts are not being taken seriously. As

has been repeated frequently by public health officials at every level, implementation of the precautionary principle when making decisions on risks to health and safety is of primary importance. Prevention is frequently the only way to avert unavoidable and/or catastrophic impacts.

Response O34-2

Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*, presents an analysis of noise impacts including noise from trains related to the proposed action. The analysis uses the Federal Railroad Administration (FRA) adopted noise assessment methods developed by the Federal Transit Administration (FTA). Per these methods, noise-sensitive land uses are identified within approximately 500 feet of the PS&P rail line for wayside noise and within 1,000 feet of grade crossings for train horn noise.

As noted in Section 3.7.6.2, *Proposed Action*, the loudest hour (measured in Leq) at grade crossings and wayside locations under the proposed action would result from a single train passby, which occurs under existing conditions. This means the maximum hourly noise levels would not change. Because freight rail traffic does not run on a schedule, the analysis assumes rail events related to the proposed action are evenly distributed over a 24-hour day. No moderate or severe impacts on sensitive receptors were identified for train wayside noise. The analysis identified moderate and severe noise impacts at residential receptors adjacent to grade crossings, due to the increase in horn noise events related to the proposed action over a 24-hour day.

FRA/FTA criteria are based on a 24-hour average sound level that is weighted for events that occur at night. While the addition of approximately one train pass per day on average under the proposed action would increase the average daily noise level from horn soundings at rail crossings, and in some cases result in the impacts described above, the actual horn noise associated with any given train passage would not increase under the proposed action.

Implementation of a quiet zone is subject to FRA approval and requires measures to maintain the level of safety while reducing noise. Section 3.7 identifies a proposed mitigation measure for the applicant to support local communities in applying for quiet zones at crossings where severe impacts from increased train horn soundings were identified. Where implemented, quiet zones would eliminate impacts. The EIS acknowledges that where quiet zones were not implemented at these crossings, the potential for severe impacts would remain.

Comment O34-3

Estimated Failure Rates:

Estimated failure rates for on-site releases are based on the United Kingdom's Health and Safety Executive (2012) estimates for large tank releases and for smaller loading and unloading releases on the Glosten Associates analysis (2014) for the proposed Gateway project. No discussion is given in the risk assessment for this DEIS of the validity or applicability of these failure rates to the proposed activities at Westway or Imperium. Furthermore, these estimates are used on the assumption that the “hazards of seismic and tsunami-related events have been taken into account in the design of the tanks, both existing and proposed...” WPSR has shown in their comments and analysis that this assumption is not valid. For these and other reasons, the failure rates for on-site releases in this DEIS are questionable. Therefore, the risk assessment grossly underestimates the real risks of this project.

Furthermore, the risk assessment describes the PS&P (Railroad) average accident rates at 22.325 per year and proceeds to estimate the likelihood of rail related releases at once in every 29 to 44,000 years!

This makes no sense and therefore is an unacceptable analysis of risks.

Response O34-3

For information about the development of the failure rates used in the risk assessment as presented in Draft EIS Appendix M, *Risk Assessment Technical Report*, refer to the Master Response for Risk Assessment Methods. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment O34-4

Diesel Emissions from Trains, Marine Vessels, and Support Vehicles:

Diesel exhaust is made up of a number of substances with gaseous and soot (particulate) components including carbon monoxide, nitrogen dioxide, sulfur oxides, PAHs, carbon particles and metals.(6) Individuals living and working in proximity to trains and other sources of diesel emissions are vulnerable to inhalation of diesel gases and particulate matter. Diesel engine exhaust is carcinogenic to humans (WHO/IARC). In 1996, the US EPA placed the Puget Sound area in the top 5% nationally for potential cancer risk from air toxics. Furthermore, even low levels of diesel particulate matter below federal standards have been linked to adverse health effects in children, the elderly, and other vulnerable populations. These impacts must be evaluated for the entire route of transport of oil by rail, including the communities along the rail route, as well as the communities near the proposed site.

Response O34-4

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter in the study area related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant.

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport in the extended study area qualitatively.

Comment O34-5

General Impact Analysis:

Much of the discussion of impacts assumes that if a situation exists now, then “small” increases over the current situation are not significant. We are dismayed that the DEISs appear to assume that present day existing conditions are acceptable and that so-called minimal increments in adverse impacts would be of no consequence. For example, because there is an existing facility, and existing rail traffic, existing oil tanks, etc., any added noise or vibration or visual or hazard risk would not be

significant. On the contrary, the cumulative effects can build up additively or synergistically and can lead to increases in adverse health effects and/or to different adverse health effects.

Response O34-5

In accordance with SEPA, the EIS focuses on impacts that have a reasonable likelihood of more than a moderate adverse impact resulting from the proposed action. The EIS evaluates and discloses direct, indirect, and cumulative impacts resulting from the proposed action, including those that are incremental. The EIS includes a no-action alternative to provide a baseline for analysis of the proposed action. Refer to the Master Response for Baseline and No-Action Alternative and the Master Response for Cumulative Impact Analysis.

Comment O34-6

Health Impacts of Delays Associated with At-Grade Crossings:

The draft EIS finds that "extended occupancy times at the grade crossings between east Aberdeen and the project site are common." (p. 3.15-16, DEIS Westway Expansion Project) Due to limited track lengths in Poynor Yard, long trains leaving Aberdeen traveling west on the PS&P line are assembled from short segments. Cars must be "doubled". Doubling a train out of the yard can take up to 50 minutes and no westbound train can run into Aberdeen at this time. The train building process can result in the grade crossings being occupied for long periods east of Poynor Yard including in east Aberdeen in the Olympic Gateway Plaza area. This would seem to be the appropriate place to mention the impacts on local economy of blocked at-grade crossings near a shopping center. However, no mention was made of this potential adverse impact. The DEIS uses "daily average crossing occupancy time" for all trains rather than stressing the important facts that occupancy times can vary between 44 minutes and 14 minutes for eastbound trains and between 6 and 12 minutes for westbound trains. Use of a daily average crossing occupancy time minimizes the difference between the "No Action Alternative" and the proposed action. This is misleading. ANY of these delays for emergency vehicles can result in deaths and otherwise preventable serious health impacts.

Response O34-6

Draft EIS Chapter 7, Section 7.3, *Cost-Benefit Analysis*, provides an analysis of the costs and benefits of the proposed action relevant to the City of Hoquiam. Specifically, it considers the costs and benefits that would affect the residents of Hoquiam and the city at large as well as resources in Aberdeen to the extent that job creation in Aberdeen would affect the residents of Hoquiam. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Daily average crossing occupancy time was used to provide a relative means of comparison for the potential increase in delay between the proposed action and no-action alternative. As noted in Draft EIS Section 3.16, *Vehicle Traffic and Safety,* because the frequency of train traffic on the PS&P rail line would increase, the probability of an increase in emergency response time at these crossings would also increase. This impact would only occur if an emergency vehicle experienced a delay as the result of encountering a train that was going to or coming from the project site, which would operate on average 1.25 times per day. Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, Figures 3.15-6 and 3.15-7, illustrate westbound and eastbound occupancy times by train type in east Aberdeen.

Table 3.15-10 illustrates the maximum occupancy times per train for the proposed action and no-action alternative trains at selected grade crossings.

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas. The Final EIS reflects the addition of a proposed mitigation measure to improve the timeliness of emergency response to properties south of the rail line in the Port area.

Comment O34-7

Furthermore, the DEIS states the planned PS&P infrastructure projects under the "No Action Alternative" would increase capacity from 12 to 19 trains. These projects "would reduce rail traffic delay because projected traffic on the rail line would be substantially below the capacity limit." This confusing statement is made in spite of the fact that none of the proposed projects serves to reduce delays.

In Section 3.15.7.1, Applicant Mitigation "Impacts on rail traffic resulting from the proposed action are considered low and would not necessitate mitigation beyond the minimum requirements specified by applicable laws and regulations." In the next section, "Other measures to be considered," we find that the responsibility for reducing risks is placed almost entirely on the public, NOT the applicant, by suggesting that implementing community awareness programs and coordinating emergency response plans would mitigate impacts. The public will recognize this as thinly disguised neglect of responsibility on the part of those preparing this document and the deciding agencies. This is unacceptable. This section concludes that there would be no unavoidable and significant impacts on rail traffic. This is an astounding conclusion given the many pages documenting the fact that delays would be increased by as much as an hour at various parts of the route. How can this be characterized as "insignificant?"

Response O34-7

Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, addresses rail traffic and capacity and not vehicle delay. The Final EIS section reflects clarification that the planned PS&P infrastructure projects would improve the theoretical capacity of the rail line under the no-action alternative.

Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, addresses impacts on rail capacity associated with routine operations. Impacts and proposed mitigation measures to address the potential impacts from increased risk of oil spills, fires, and explosions during rail transit are addressed in Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*. Because PS&P is not the applicant for the proposed action, measures to reduce potential risks during rail transport are not presented as applicant measures. Refer to the Master Response for Mitigation Framework.

Section 3.16, *Vehicle Delay and Safety*, considers the vehicle delay impacts from the increases in blocked at-grade crossings that would occur under the proposed action. The Final EIS section clarifies that although implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).

- Peak hour: Washington Street (Port of Grays Harbor area).

Comment O34-8

Assumptions and Analysis of Crude Oil:

The DEISs primarily focus on the projects transporting and storing crude oil from the Bakken region. Yet both projects state that they may store and ship Alberta tar sands as well. The final EISs should incorporate a more thorough analysis of the impacts, risks, threats, and mitigation measures associated with both types of crude oil, which act very differently in water and during an accident. It is important to recognize that oil from the Alberta region is not subject to the crude oil export ban and that the behavior of the various forms of dilbit has been studied using Cold Lake crude which is far lighter than that from the Athabasca region which is the primary source of crude from Alberta.

Response O34-8

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

Comment O34-9

Export of Crude Oil:

The DEISs fail to adequately evaluate the impact of bringing in Canadian crude oil into the projects and the potential to export this crude oil. Additionally, the DEISs fail to adequately address the potential to lift the existing ban on exporting domestic crude oil, such as from the Bakken region, and the impact this would have on increasing the volume of crude oil traveling through the Grays Harbor region.

Response O34-9

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

The analysis presented in Final EIS Appendix Q, *Crude Oil Market Analysis*, found that despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States in December 2015, the likely destination of crude oil under the proposed action

remains West Coast refineries. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment O34-10

Drinking Water:

The scope of the DEISs should be expanded to acknowledge and adequately analyze the greatly increased risk to drinking water quality and quantity for multiple communities along the transportation corridor and proposed storage areas. We believe the proposed action would have unavoidable and significant adverse impacts on clean and safe drinking water supplies.

Response O34-10

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal or along the PS&P rail line, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on groundwater.

Comment O34-11

Health Impact Assessment (HIA):

Certainly an HIA for these projects is warranted. If you do not select the "No Action Alternative", we request that you undertake a HIA that adheres to the principles of democracy, equity, sustainability, ethical use of evidence and comprehensive approach to health.

Response O34-11

SEPA does not require that a formal health impact assessment be conducted as part of an EIS. The Draft EIS considers the following impacts related to human health. Final EIS sections have been revised, as noted below, to more fully describe these impacts.

- Chapter 3, Section 3.2, *Air*, describes potential impacts on air quality and the potential for increased cancer risk from emissions of diesel particulate matter related to construction and routine operation of the proposed action. The Final EIS section has been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analysis predicts lower emissions; the level of increased risk is not considered significant.
- Chapter 3, Section 3.7, *Noise*, describes potential impacts on sensitive receptors near the project site and transportation corridors from increased noise and vibration related to construction and routine operation of the proposed action.

- Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, describes potential impacts on public safety and emergency vehicle access from increased vehicle delay related to rail traffic from routine operation of the proposed action.
- Chapter 4, Section 4.7.1.7, *Human Health*, describes potential impacts of an oil spill on human health. The Final EIS section reflects a fuller description of these potential impacts.
- Chapter 4, Section 4.7.2.3, *Human Health*, describes potential impacts of a fire or explosion on human health. The Final EIS section reflects a fuller description of these potential impacts.

Comment O34-12

Tribal Treaty Rights, Treaty-Trust Obligations, and Tribal Culture:

The impacts to the health, safety and economies of the Quinault Indian Nation and the Chehalis people were inadequately addressed. Despite that, the DEISs find that there is a risk of harm to treaty—protected resources if the projects move forward. Therefore, the "No Action Alternative" should be selected. Additionally, outside the specific tribal lands and usual and accustomed fishing and hunting areas of the Quinault Indian Nation and the Chehalis people, tribal treaty lands and tribal culture all along the rail route—from the Columbia River and beyond—will be harmed by oil spills, rail congestion, air pollution, and accidents, yet impacts to these tribal nations were not reviewed. The final EISs must include these harmful impacts in its analysis.

Response O34-12

Refer to the Master Response for Purpose and Focus of the EIS a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe the potential impacts on tribal resources that could occur as the result of an oil spill, fire, or explosion.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

Comment O34-13

Climate Change and the Responsibility of the Department of Ecology:

Climate change presents the largest public health challenge of this century. The proposed oil terminals would release greenhouse gas emissions that directly contribute to climate change. According to DEIS calculations, these two terminals would collectively result in annual release of approximately 74,000 metric tons of CO2. They would also facilitate further emissions from the end-use of the crude oil, as it releases greenhouse gases upon combustion.

The DEISs improperly limit cumulative effects on climate change analysis to the Grays Harbor terminals, despite the fact that federal agencies, like the U.S. Fish and Wildlife Service, have called on Ecology and Hoquiam to review the cumulative impacts of all oil and coal shipping terminals proposed for Washington ports.

Response O34-13

Refer to the Master Response for Geographic Scope of the EIS.

Comment O34-14

In a landmark decision on November 19th, Judge Hollis R. Hill [Footnote 7: http://ourchildrenstrust.org/sites/default/files/15.11.19.Order_FosterV.Ecology.pdf] declared "[the youths'] very survival depends upon the will of their elders to act now, decisively and unequivocally, to stem the tide of global warming...before doing so becomes first too costly and then too late." Highlighting inextricable relationships between navigable waters and the atmosphere, and finding that separating the two is "nonsensical," the judge found the public trust doctrine mandates that the state act through its designated agency "to protect what it holds in trust." The court confirmed what the Washington youth and youth across the nation have been arguing in courts of law, that "[t]he state has a constitutional obligation to protect the public's interest in natural resources held in trust for the common benefit of the people."

The court validated the youths' claims that the "scientific evidence is clear that the current rates of reduction mandated by Washington law. . . cannot ensure the survival of an environment in which [youth] can grow to adulthood safely." The judge determined that the State has a "mandatory duty" to "preserve, protect, and enhance the air quality for the current and future generations," and found the state's current standards to fail that standard dramatically for several reasons.

The judge stated ". . . current scientific evidence establishes that rapidly increasing global warming causes an unprecedented risk to the earth, including land, sea, the atmosphere and all living plants and creatures."

This decision comes on the heels of growing world opinion that we must stop the development of fossil fuel infrastructure for the health of people and the planet and our future. The draft EISs only serve to draw attention to the need to apply this limited analysis to the larger picture of a connected world. What happens in Washington State affects the region, the country, and the world. Pope Francis expresses deep concern about the harm to the poor and to the planet in his encyclical. [Footnote 2: Pope Francis. Laudato Si'. On care for our common home. 2015.] Other world leaders have done the same. President Obama has repeatedly discussed climate change. In California, the Governor, the legislature, and the University of California view climate change as a threat to human well-being. [Footnote 1: Dr. Richard Jackson in letter to Dr. Thomas Frieden, Oct. 2015.]

In June, The Lancet (a leading international medical journal) expressed the need for urgent attention to the health threats of climate change. [Footnote 3: http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736(15)60854-6.pdf] The American Medical Association, [Footnote 4: HA Patz, H Frumkin et al. 2014 Climate change. Challenges and opportunities for global health. JAMA 312(15):1565-1580] the American Public Health Association, the American Academy of Pediatrics,[Footnote 5: American Academy of Pediatrics. Council on Environmental Health. 2015 Global Climate Change and Children's Health. Pediatrics 136(5): 992-997] the Union of Concerned Scientists, Physicians for Social Responsibility,[Footnote 6: Washington and Oregon Physicians for Social Responsibility. Position Statement on Crude Oil Transport and Storage to Governors of Washington & Oregon. February 2015.] and many other scientific groups are now warning their members and the general public about these threats with increasing urgency. [Footnote 1: Dr. Richard Jackson in letter to Dr. Thomas Frieden, Oct. 2015.] In September

the Washington State Medical Association passed a resolution (Resolution C-8) in opposition to the transport and storage of oil in Washington State.

Climate change in our region is anticipated to result in increased heat-related illness, potency of allergies, health care costs, and extreme weather events. Expanded ranges of disease vectors are expected to result in increased spread of infectious diseases. Low income and communities of color are likely to be disproportionately harmed.

In conclusion, the known risks associated with oil by rail transport, oil tank storage, and oil export by vessel pose an unacceptable threat to human health and safety. We are concerned health care professionals, and we are deeply troubled by the public health and safety impacts of these proposals. We request that, in view of the unacceptable risks to human health and the environment, that permits for these projects be denied and that you select the "No Action Alternative."

Sincerely,

Theodora Tsongas, MS, PhD
Environmental Health Work Group

Regna Merritt, PA
Healthy Climate Program Director

Patrick O'Herron, MD
President, Board of Directors

Response O34-14

Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

O35, Oregon Physicians for Social Responsibility, Regna Merritt

Comment O35-1

Please use and incorporate the information included in the attached document (Position Statement on Crude Oil Transport and Storage to Governors of Washington and Oregon from Concerned Oregon and Washington Health Professionals) to inform the final DEISs. Hundreds of local health care professionals oppose the transport by rail and the storage and shipment of crude oil within our states on the basis of very serious, credible threats to the health of our residents. Together, we call upon WDOE and the City of Hoqiuam to deny permits that facilitate the transfer of storage and handling of crude oil by rail and/or barge. Please select the "No Action Alternative".

Response O35-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action. Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe the potential human health impacts that could result from an oil spill, fire, or explosion. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

O36, Oregon Physicians for Social Responsibility, Regna Merritt

Comment O36-1

Please incorporate the facts and citations included in the attached document (Airborne Particulate Matter and Public Health) into a Health Impact Assessment (HIA) to be incorporated into the final DEISs and select the "No Action Alternative". Thank you.

Response O36-1

Refer to Response to Comment O34-11. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

O37, Oregon Physicians for Social Responsibility, Regna Merritt

Comment O37-1

Thank you for this opportunity to present comments. My name is Regna Merritt and I'm here representing Oregon Physicians for Social Responsibility. I traveled to carry a message from over 2,000 health professionals and public health advocates that can't be here today and are opposed to these oil projects.

I'm a retired physician's assistant. I worked in a major metropolitan trauma center and family medicine. So while we're going to submit more substantive comments, I'm going to address 2.1 related to trauma and to family medicine.

Which trauma center will be on point in the event of an injury sustained after a horrific explosion following a derailment or fire at these tank farms? What is the capacity of the emergency response to manage a catastrophe such as was experienced in Lac-Megantic where 47 perished? We believe there is potential for catastrophe and these potential impacts cannot be mitigated.

Response O37-1

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment O37-2

Family Medicine. Noise pollution associated with the sounding of horns presents an incredible risk to health that most people are not aware of. And I'm happy that you address this in the DEIS, but I don't feel it was addressed adequately.

Train horn sounds trigger health and mental health issues. Increased cardiovascular issues including myocardial infarctions and arrythmia are associated with nighttime noise and noise over nine decibel, which is the noise level of train horns.

Children exposed to noise from these horns exhibit adverse psychiatric effects. Trying to mitigate for increased train noise is a no-win situation. These are incredibly expensive costs borne by taxpayers, not by the railroad companies. Please select no action alternative.

Thank you.

Response O37-2

Refer to Response to Comment O34-2.

O38, Pacific Coast Shellfish Growers Association, Becky Mabardy

Comment O38-1

PCSGA

PACIFIC COAST SHELLFISH GROWERS ASSOCIATION

November 25, 2015

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

Re: The Pacific Coast Shellfish Growers Association (PCSGA) presents the following comments on the EIS for the proposed Westway & Imperium projects.

Shellfish growers realize that there are competing uses for coastal areas and resources. We appreciate ports interests and desires to remain competitive, but worry that the action to allow export of coal and tar sands will put the shellfish industry and the health of state's coastal resources at risk. The Pacific Coast Shellfish Growers Association (PCSGA), founded in 1930, represents shellfish growers from Alaska, Washington, Oregon, Hawaii and California who sustainably produce oysters, clams, mussels, scallops and geoduck. These dedicated individuals pride themselves not only on the quality and freshness of their shellfish but also in their role as environmental stewards, mindful of the dynamic conditions in the marine environment. PCSGA represents both private and tribal shellfishing interests and most members farm because their parents, grandparents and even great-grandparents did – demonstrating a longstanding commitment to natural resources. PCSGA urges you to consider input during this process from shellfish growers and other stakeholders within this community.

The Environmental Impacts Statement (EIS) is incomplete in accounting for environmental damages associated with the proposed plan. Although uncertainties exist, it is clear that an oil spill would destructively modify the habitat critical to shellfish farms. The US Coast Guard estimates a 5% recovery of oil from coastal estuaries and nearshore waters in the event of a spill. The Gulf BP spill

demonstrated how tar sand oil hardens over time and is incorporated into sediment for continuous toxic release. The word "pollution" does not begin to describe the aftermath of an oil spill. In addition to environmental damages, the Gulf's seafood industry is tarnished by consumer's negative perception based on reduced product quality. The EIS needs to more clearly describe and evaluate impact 3.25 dealing with crude oil transit through the region and within watersheds that support shellfish growing area. The EIS needs to push further to describe a response plan following a spill.

Various historical oil spills caused fisheries closures and created human health risks (see Table 1). The EIS needs to consider how previous spills impacted coastal industries, and develop a plan to mitigate the magnitude and duration of a Westway & Imperium spill event. Any coal and tar sands oil contamination will degrade marine and nearshore waterways, especially intertidal-benthic communities. Washington State has appointed marine protected areas and marine sanctuaries to its coastal waters. One key element of the statute is to protect and preserve existing sustainable uses. The EIS needs to be clear about how the proposal supports the specific statutory requirements in regard to Coastal Marine Spatial Planning. On behalf of the shellfish industry, PCSGA needs the EIS to fully disclose the environmental damage that could result from the proposed plan.

[Table 1. Human health risk calculation parameters for reopening of fisheries waters after the DH blowout and previous U.S. oil spills]

Gohlke JM, Dzigbodi D, Tipre M, Leader M, Fitzgerald T. 2011. A Review of Seafood Safety after the Deepwater Horizon Blowout. Environmental Health Perspective 119(8):1062-1069.

Overall, the EIS fails to acknowledge the shellfish industry's contribution to the valuable seafood industry along the Washington coast. The consequences of a spill will cause dramatic financial losses for a substantial period of time. While Washington's shellfish industry is valued at approximately $182 million, a survey conducted in 2010 by the Pacific Shellfish Institute found that 29% of the state's shellfish jobs are localized in Grays Harbor and Pacific counties. In addition to providing a sustainable and locally harvested source of protein, the shellfish industry supports dependable employment in rural communities. Not only could these proposed projects directly impact our shellfish growing areas, but they may also run the risk of negatively impacting crab and salmon fisheries by degradation of marine and upland habitats.

The EIS does not identify the responsible party/parties tasked with expenses associated with nearshore damages when they occur. Further, the EIS is insufficient in describing measures taken to preserve the local economies of Grays Harbor and Pacific counties. As an industry that totally relies on a healthy shorelines and responsible planning, PCSGA needs Westway & Imperium to complete the required analyses and put plans in place to ensure that existing sustainable shellfish aquaculture not be tainted or tarnished by the proposed project.

Response O38-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action and requirements for financial responsibilities. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type

of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including on shellfish and acknowledges the potential for more lasting impacts as the result of a spill.

Comment O38-2

In recent news, TransCanada Corp. withdrew its proposed Keystone XL pipeline after the Obama administration rejected the project November on 6, 2015. It is realized by the public and politicians that crude oil production and refining is not in the interests of the United States as this undermines our nation's global leadership in fighting climate change. Washington State has identified itself as a key player in reducing the state's carbon footprint. In 2012, Governor Inslee established a task force to begin an implementation plan through executive order. The Westway & Imperium projects must be considered an increase in the state's carbon impact by allowing carbon based fuels to pass through Washington Ports so as to increase global carbon pollution. The EIS is grossly inadequate in reconciling this increase in production with the state's statutory goals to reduce carbon contributions. PCSGA needs to know how Westway & Imperium will mitigate this difference.

Thank you for the opportunity to comment on the Westway & Imperium projects.

Respectfully,

Becky Mabardy
PCSGA Outreach and Project Coordinator

beckymabardy@pcsga.org
120 State Ave. #142
Olympia, WA 98501

Response O38-2

Refer to Chapter 3, Section 3.2.7.1, *Applicant Mitigation*, for proposed mitigation measures for air quality and greenhouse gas impacts. Refer to Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

O39, Pederson Brothers Inc., Joe Wilson

Comment O39-1

We support the construction for both of the Westway Terminal and the Imperium Terminal. We are an off-site Heavy Structural Fabricator with subcontractors near these potential jobsites. By building these projects not only would there be family wage jobs provided at these jobsites but also there would be additional employment furnished to contractors and subcontractors like ourselves who are located offsite in the state of Washington. These projects need to be built along with maintaining reasonable and sound environmental regulation. Respectfully, Joe Wilson VP/Sales Pederson Bros., Inc.

Response O39-1

Comment acknowledged.

O40, Polly Dyer Cascadia Broadband, Shelley Spalding

Comment O40-1

October 26, 2015

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

Subject: Westway and Imperieum proposed oil-by-rail teminals

Dear Washington State Department of Ecology and City of Hoquiam staff and elected officials,

The Polly Dyer Cascadia Broadband appreciates the opportunity to comment on the proposed Westway and lmperieum proposed oil-by-rail terminals. The Polly Dyer Cascadia Broadband is the Washington chapter of the Great Old Broads for Wilderness. Great Old Broads for Wilderness is a national grassroots organization that engages and ignites the activism of elders to preserve and protect wilderness and wild lands.

We are writing in support of the letter written and submitted by our member and Advocacy Assistant, Pat McLachlan, which opposes the Westway and Imperieum proposed oil-by-rail terminals. We are adding the following comments and emphasis:

> There are 7 federally declared and protected Wildernesses on the Olympic peninsula. They are the Washington Islands (right off of Hoquiam and the rest of the coast northward), Colonel Bob, Wonder Mountain, Mount Skokomish, The Brothers, Buckhorn, and the Olympic Wilderness. These Wilderness areas and the life within them would irreparably damaged [sic] by spills and explosions that would be likely to occur in a setting where millions of gallons of dirty, crude oil are transported on trains into this area, stored in oil tanks, and loaded onto ships that travel the coastlines to refineries.

Pollution of our air, land and water is a part of this fossil fuel nightmare. Oil spills and explosions caused by derailments of oil tank cars being transported on antiquated rails over miles of wetlands and through small towns would not only kill many lives but would pollute our air, water and land. Train engines pulling tank cars and onsite operations at oil terminals release toxic pollutants including diesel particulate matter, benzene, formaldehyde and toluene. As is evidenced by past disasters, accidents involving ships transporting millions of gallons of oil from these terminals would despoil our beaches.

Response O40-1

Refer to the Master Response for Geographic Scope of the EIS.

Comment O40-2

The Great Old Broads for Wilderness has a Climate Change position statement which states the need to keep fossil fuels such as oil in the ground." It is our only chance to keep global temperatures and the Earth's vital signs from reaching a tipping point." By saying no to Imperium and Westway Oil Companies, we can prevent the building of infrastructure in this area that supports fossil fuel use.

Response O40-2

Comment acknowledged.

Comment O40-3

Hopefully, Washington State and our local and federal governments will then encourage companies to invest in clean, renewable sources, such as solar and wind, to meet our energy needs and to minimize the impact on our precious Earth and its inhabitants. Oil spills will happen; they do all the time. In Sightline Daily, Eric de Place describes 17 devastating oil spills from 1976 to 2014 in the U.S. that could also happen here in the Pacific Northwest. After all, Ecology reports that almost 1billion gallons of crude oil was transported in Washington State in 2013. This proposal would add another 2 billion, making a total of 3 billion gallons ·of oil transported annually. And numbers of spills are up. In McClatcfly News, Curtis Tate states that more crude oil was spilled in U.S. rail incidents in 2013 than was spilled in the last 40 years; 1.15 million gallons of crude oil was spilled.

The risks for an oil spill from a train or tank or ship are huge, especially since the large tankers can contain 26 million gallons of oil, yet the DEIS says a chance of a large spill is ''unlikely," admitting when it does occur "there would be the potential for severe impacts on the environment or humans." We believe given the data on frequency of oil spills that the DEIS needs to be corrected to state that the chance of a large spill is "likely" and agree the impacts will be severe. The damage will be significant, adverse and unavoidable. The costs will bankrupt companies and communities, and most especially, our Tribal communities. Many lives will be lost. Therefore, this proposal should be rejected.

Two billion gallons a year of dirty, crude oil will come from oil fields in North Dakota and Canada by trains that wend their way through small and large towns in Washington to be loaded into the tanks in Grays Harbor. From these large tanks, this oil will be loaded into ships that will ply the coastal waters north, south and west to refineries and to China.

Response O40-3

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts,* presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks. Refer to the Master Response for Oil Spill Modeling Methods for information about the approach, assumptions, and limitations of the oil spill modeling in Draft EIS Appendix N, *Oil Spill Modeling*.

Comment O40-4

And if this isn't risky enough with aging rails, and tanker cars; narrow harbors with excess boat traffic; and sometimes fierce ocean storms, these actions involving a dangerous pollutant will also take place on the Cascadia subduction earthquake zone which runs 700 miles from California along Oregon and Washington to Vancouver Island, Canada.

In "The Really Big One," Kathryn Schultz, notes that the Cascadia z.one has experienced 41 large earthquakes in the past 10,000 years, an average of 1 every 243 years. It has been 315 years since the last one which was a 9. magnitude in 1700. The odds of the big Cascadia earthquake of an 8 to 8.6 magnitude happening in the next 50 years are roughly 1 in 3. The odds of the very big one of a 8.7 to 9.2 are 1 in 10.

When the next full-margin earthquake/rupture happens, this will be the worst natural disaster in the history of North America. And it is predicted that an 8. or 9. earthquake and the accompanying 100 foot tsunami would wipe out the oil tanks storing the oil in Grays Harbor and the ships loaded with it in the harbor and along the coast. Along with the earthquake's devastation would be spills of hundreds of millions of gallons of oil along the beaches and in the harbors, polluting water, land and air and killing everything in their path. The DEIS, gives the chance of a large earthquake happening as ''unlikely," when the data shows it is "likely." This needs to be corrected. The DEIS does say if a large earthquake occurs, ''there would be the potential for severe impacts on the environment or humans" of oil spilling. The damage will be significant, adverse and unavoidable. The costs will bankrupt companies and communities. Many lives will be lost. Therefore, this proposal should be rejected.

We believe that State of Washington should deny these companies permits and that these terminals should not be built.

Response O40-4

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Final EIS Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* acknowledges that a large-scale tsunami would cause unavoidable and significant adverse impacts if the facility was not constructed to withstand it.

Comment O40-5

We have a brief span of time to make a difference in the trajectory of our planet towards a climate change disaster. We must act now. By saying no to lmperium and Westway Oil Companies, we can prevent the building of more infrastructure in this area that supports fossil fuel use. We can also prevent the widespread destruction of life that oil spills inflict. Hopefully in the future, Washington State and our federal government can do more to encourage companies to move beyond oil to invest

in clean, renewable resources, such as solar, wind, and biofuels to meet our energy needs and to minimize the impact on our precious Earth and its inhabitants.

We urge the State of Washington and the City of Hoquiam deny these companies permits and that these terminals not be built.

Sincerely,

Shelley Spalding, leader of the Polly Dyer Cascadia Broadband
330 W Satsop Bridge Road
Elma, WA 98541

Response O40-5

Comment acknowledged.

O41, Puget Sound & Pacific Railroad, Kenneth Charron

Comment O41-1

Puget Sound Pacific PSP
A Genesee & Wyoming Company

November 25, 2015

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

RE: Westway Expansion Project Draft EIS

Dear City Administrator Shay and Regional Director Sally Toteff,

Please accept the following comments on behalf of the Puget Sound & Pacific Railroad (PSAP) regarding the Draft Environmental Impact Statement (EIS) for the Westway Expansion Project. The PSAP transports freight over 108 miles of track in Western Washington, connecting with BNSF and UP, the two largest railroads in the United States. PSAP provides the vital link between the Port of Grays Harbor and the national rail freight network. PSAP employees live and work in the same communities they serve and are committed to safely and efficiently supporting the growth that they help bring to the region. PSAP was acquired in 2012 by Genesee & Wyoming (G&W), North America's largest owner of short line and regional freight railroads and a safety leader in the industry.

Railroad role in the EIS process

PSAP, like most freight railroads in this country, is a “common carrier” railroad and operating pursuant to the authority and under the jurisdiction of the federal government. Simply put, this means that PSAP is obligated by federal law to transport any commodity that is properly documented and in an approved freight car. PSAP's common carrier status means that the developers of the proposed export terminals can expect PSAP to move crude oil and other bulk

liquids from its connections with the UP and BNSF to any facilities in Grays Harbor. We at PSAP are committed to providing transportation services to all our customers, current or future, in order to support the businesses of our customers. As always, our foremost priority is safety of our neighbors, customers, employees and the communities through which we operate. By providing safe, efficient service to our customers, we support a strong economy for the benefit of Grays Harbor County.

Policies for transporting crude oil and other bulk liquids

PSAP is committed to safely transporting crude by rail and other bulk liquids in Washington and will ensure strict adherence to all federal regulations, and operating procedures. PSAP will actually exceed these guidelines with the following safety measures:

- Restrict crude oil trains to a maximum of 25 mph, or 10 mph in urban, residential and areas of significant potential environmental impact.
- Precede every crude oil train by a track inspector in a hi-rail truck to ensure that the route is intact and free of obstructions.
- Operate crude oil trains with no planned stops en route to their destination, and never leave loaded crude oil or other hazardous materials trains unattended.
- Inspect its track weekly in accordance with Federal Railroad Administration (FRA) requirements and then conducts an additional weekly track inspection on parts of the railroad that handle crude oil.
- Inspect rail bridges on a routine basis by trained railroad employees, expert contractors and the FRA. PSAP with then plan bridge maintenance work based on those inspections.
- Conduct sophisticated tests of track geometry and employ two different test methods to detect flaws inside the rail in order to address any issues detected by these tests.

Provide a crew of at least two people whenever crude oil is being transported.

All of the above operating guidelines will be used by PSAP in handling any future crude oil trains over its railroad to and from Grays Harbor.

Response O41-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. It is acknowledged that any future maintenance would be determined based on applicable regulatory requirements, future rail traffic volumes, and PS&P's rail customer needs.

The typical train speeds assumed for operation of oil trains between Centralia and the project site are shown in Appendix L, Vehicle Traffic Analysis, Tables 10 through 29. As shown, train speed analyzed was generally 10 mph or less in developed areas and along the Chehalis River. If loaded oil trains were to be operated in additional areas at speeds below 10 mph, then vehicle delay at grade

crossings would be greater in those areas than estimated in Section 3.16, *Vehicle Traffic and Safety*. However, estimated delay at grade crossings in these areas is relatively low and an increase in delay would not decrease the level of service (LOS). Thus, revision of the vehicle delay and rail analyses to reflect a maximum speed of 10 mph for loaded oil trains is not warranted.

Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*, analyze potential risks to rail operations including train speed. Accident rates for Class 2 track are shown in Appendix M, Table 6, Accident Rates (per million train miles) for Track Class 2. Table 6 shows annual data for 2011 through 2014 as well as a 4-year average rate. These data consider both high speed and low speed incidents as discussed in Appendix M, Section 4.2.2, *Accident Rates.*

Comment O41-2

Emergency planning

The FRA requires any railroad handling hazardous materials to have an emergency response plan. PSAP has detailed written plans in case of an incident along the railroad that could impact the local community and/or environment. These plans are shared with all first responders along the line and include:

- Notification and coordination procedures with local, state and federal agencies.
- Details of the methods of response to different types and size of incidents.
- Identification of responsible and trained personnel.
- Strategically-located, prepositioned spill-containment and cleanup equipment within the region, and mutual aid/cooperative agreements with other railroads.

PSAP regularly holds training and drills for local first responders and railroad employees. The most recent training was held in Aberdeen on October 28, 2015. Along with other railroads, PSAP will provide opportunities for first responders to attend the Security and Emergency Response Training Center in Pueblo, Colorado, where they learn how to safely handle accidents involving tank cars carrying hazardous materials. While the focus at PSAP is to prevent any such incident from happening, it is critical that first responders and railroad managers are experienced and able to coordinate their resources in order to handle possible emergency situations.

Response O41-2

FRA's oversight role and regulatory authority for rail transportation of hazardous materials is described in Draft EIS Appendix B, *Laws and Regulations*, Section B.1.19, *Hazardous Materials Regulations (49 CFR 171-180)*. Chapter 4, Section 4.5.3.2, *Applicant Mitigation*, and Section 4.5.3.3, *Other Measures to Be Considered,* include measures to facilitate training of local first responders.

Comment O41-3

PSAP/G&W's Safety Record

PSAP's parent company, G&W, is a leader in rail safety. Over the last five years, G&W railroads have had a combined employee injury rate lower than any large railroad and several times safer than the short line railroad average. Prevention of employee injuries is a key indicator of a railroad's overall

focus on safety and generally reflects the overall focus on safety of the railroad. If employees are following operating and safety rules and exercising appropriate caution for themselves and those around them, they will not be injured. The focus on PSAP by its employees is straightforward: If an action on the railroad cannot be undertaken safely, then it will not be done.

As of November 2015, PSAP employees have worked over 1,000 consecutive days without a reportable employee injury - a remarkable achievement. Even with this record of accomplishment, we never rest on our past safety performance. We are constantly training, testing, observing, coaching and reinforcing safety with our employees. PSAP employees also routinely receive instruction at a world-class training center in Jacksonville, Florida, and take part in a renowned DuPont safety-training program.

Railroad regulators

Created in 1966, the U.S. Department of Transportation FRA is the lead agency with operational and safety oversight of railroads in the United States. FRA establishes rules, regulations and procedures and inspects railroad operations. FRA practices are based on long-standing research experience and the involvement of technical experts in rail operations and safety. They provide a thorough means to oversee railroad operations to ensure a strong focus on safe operations. This federal oversight is critical for freight railroads, whose interstate network spans more than 138,000 miles across the continental U.S. and Alaska. Washington State Department of Transportation also fields rail inspectors, with authority delegated from the FRA federal mandate. Some of the key FRA oversight and enforcement activities include:

- Track, bridge and road crossing safety
- Operating rules and practices
- HAZMAR shipment handling, documentation and employee training
- Noise emissions, horns and signaling
- Employee hours of operation and occupational safety
- Training and certification standards
- Locomotives, freight car, tank car and passenger car standards
- Incident reporting and investigations

Response O41-3

Draft EIS Appendix M, *Risk Assessment Technical Report*, considers national accident rates related to derailment and collision. The Draft EIS does not describe employee injury rates for rail operators. The FRA's oversight role and regulatory authority for rail transportation are described in Appendix B, *Laws and Regulations*, Sections B.1.19, B.1.32, B.1.37, B.1.38, B.1.40, and B.1.41.

Comment O41-4

In addition to the general comments above, we have attempted to address several specific areas of the EIS that reference rail operations and where assumptions about rail operations need to be clarified or modified:

Air Emissions (3.2.7.1)

PSAP has established policies that balance air emissions, fuel economy, operational needs and equipment longevity. One specific policy example is to shut down locomotives after idling for 15 minutes. An exception is when the weather is 35 degrees or colder, which occurs on a very limited basis during the winter. The reason for this is to avoid cold starts, which can damage the engines. There are also policies involving routine maintenance and daily inspections of locomotives that will help reduce emissions.

But there is an error in the calculations of air emissions that needs to be corrected. After reviewing the EIS and follow-up correspondence, we learned that the data was based on an assumption that all three locomotives on the train will be used for switching operations. In reality, at most two locomotives will be used for switching cars into the Westway site after the train reaches Poyner yard. This will significantly reduce emissions from the amount calculated in the EIS.

For the transportation of rail cars from connections with the UP and BNSF, PSAP will operate locomotives supplied by either UP or BNSF in order to minimize the need for the operation of additional PSAP-owned locomotives at the location of such connections.

Response O41-4

The Final EIS air emissions and cancer risk analysis in Chapter 3, Section 3.2.5.2, *Proposed Action*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, reflect the following revised assumptions for switching operations from Poynor Yard to the project site, based on the information provided by the commenter.

- During the movement of the oil cars from the Poynor Yard to the project site, no more than two locomotives would be used in this operation
- 98% of the locomotives would be equipped with Automatic Engine Shut-off System (AESS)
- All locomotives would be Class-1 line-haul engines, not locomotives from PS&P.

Because of the Class-1 line haul engines operated by large railroads have substantially more stringent federal emission standards, these changes result in lower diesel particulate matter emission rates and result in a lower cancer risk. The incremental increases in air quality cancer risk are all less than 10 in 1 million for any off-site receptor. Section 3.2, *Air*, Figure 3.2-1, Average Diesel Particulate Matter Inhalation Risk (2017) identifies the residences where the risk level is more than 1 in 1 million. Based on the revised analysis, Final EIS Section 3.2.7.1, *Applicant Mitigation*, reflects the removal of mitigation to monitor diesel particulate matter emissions at and near the project site. Additionally, based on information provided in PS&P's comment letter regarding its policies related to limiting locomotive idling to 15 minutes, Section 3.2.7.1, reflects the removal of the mitigation measure related to minimizing locomotive idling. Based on the revised assumptions, the cumulative analysis in Final EIS Chapter 6, Section 6.5.1, *Air*, indicates that if all cumulative projects are operating at maximum throughput, the 10-per-million-and-above risk level from rail operations would be limited to the project sites.

Comment O41-5

Future Maintenance Projects (3.15.4.5)

PSAP is committed to maintaining the line in accordance with the standards required by the Federal Railroad Administration and with consideration given to the operations on the line. Therefore the projects listed in Section 3.15.4.5 may vary in scope depending on the traffic associated with all rail customers on the line.

Response O41-5

Final EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections, Future Maintenance Projects*, has been revised to clarify that the scope of the projects listed may vary depending on future traffic volumes and PS&P customer needs and would be determined based on applicable regulatory requirements.

Comment O41-6

Vehicle Traffic (3.16.7.1)

Appendix K indicates that the crossings into the Olympic Gateway Plaza would be blocked. While several of the crossings would be blocked during the process of assembling the train, after the train is assembled it will be pushed back to a point just east of Port Industrial Road which will keep the train clear of all the intersections for Olympic Gateway Plaza and Port Industrial Road during the final inspection and testing of the trains.

Response O41-6

The Draft EIS Appendix K, *Rail Traffic Technical Information*, Section K.4, analysis of gate downtime assumes that trains would depart after assembly, because blocks of cars would be tested in the yard prior to assembly of the train, so it assumes no blockages during inspections. As stated by the commenter, if trains were to be inspected after assembly, they could be pushed back to clear the entrances to the Olympic Gateway Plaza during the inspection process; however, other crossings would be blocked. As noted in Final EIS Chapter 3, Section 3.15.5.2, *Proposed Action*, actual operations could vary and would be dependent on specific circumstances such as the availability of the crewmembers and space and facilities in Poynor Yard. The Draft EIS represents a reasonable depiction of the process of delivering and releasing a 120-car unit train.

Comment O41-7

Emergency Service Provider Access (3.16.7.1)

PSAP has plans and protocols with emergency service provider agencies for notification during emergency and unplanned stops that affect public grade crossings. PSAP provides information at grade crossings as regulations require, which includes a toll free phone number and crossing identification number so the public can report any incidents, malfunctioning warning devices, stalled vehicles or other dangerous conditions.

In summary, PSAP's focus is on the safe operation of providing transportation services, especially in its operations across at-grade roadway crossings. PSAP actively support and participates in Operation Lifesaver, a nationwide public education program to help prevent collisions, injuries and fatalities at highway and rail grade crossings. Under FRA's Train Horn Rule, locomotive engineers must begin to sound train horns at least 15 seconds, and no more than 20 seconds, in advance of all

public grade crossings. Since freight trains are not on a fixed schedule, horns are an important part of our safety practice.

Please make sure to include these comments as part of the administrative record for this important environmental review process. PSAP is committed to supporting the local economy, while safely fulfilling its common carrier obligation.

Sincerely,

James Irvin
President
Puget Sound & Pacific Railroad

cc: Port Commissioners
Port Executive Director
Key local, state and federal elected officials

Response O41-7

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of information provided by PS&P at grade crossings. It also reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions.

O42, Raging Grannies Activist Women

Comment O42-1

We are from Portland, Oregon. These trains and their polluting effects are not just for this area or Washington, but for the entire Northwest and the world.

We are all part of Raging Grannies Activist Women who speak our minds often in song. And we're all retired teachers.

(To the tune of She'll be Comin' Round the Mountain.) We present an urgent message here today. Don't develop Westway down in Grays Harbor. All the dangerous fumes and fires are well-known though they conspire to erect a terminal to have their way. Our protest now is here in Aberdeen. Health and safety are essential every day. They don't care about abuses, they come up with lame excuses, we insist that they should clearly stay away.

We demand that this proposal be denied to avoid the tragedies we could describe. They don't offer jobs and skills, Grays Harbor people may get killed, we demand that this proposal be denied.

We present an urgent message here today. Don't develop Westway down in Grays Harbor. All the dangerous fumes and fires are well-known though some conspire to erect a terminal and have their way.

Response O42-1

Comment acknowledged.

O43, Renewable Energy Group[2], Scott Hedderich

Comment O43-1

Just to correct the record, I'm not Doug Judge, I'm Scott Hedderich with Renewable Energy Group, but that's all right.

And to clarify, we will be submitting written formal counsel as well to the technical aspects within the Draft EIS.

My name is Scott Hedderich. I'm Director of Corporate Affairs for Renewable Energy Group, and we're very proud to have the Grays Harbor team now as a member of the REG family, as America's -- as North America's largest producer of advanced biofuels.

The addition of this Grays Harbor facility is a significant milestone for our company and one we're proud up. We're very pleased to be able a make American made global fuel, that in the last two years has reduced life cycle greenhouse gas emissions by more that 80 percent, and we look forward to producing even more biomass (inaudible) right here in Washington state.

In addition to a world class biomass production company, REG also will acquire the rights to Imperium's Expansion Project application. I want to remind folks, we're new to the area, we've only had the—acquired the REG facility for less than 60 days. So we continue to review what its potential development impacts are on the REG business.

We're here today to listen and to learn. We'll be sure to factor in economic impacts, regulatory compliance, and the community opinions into any decision we make going forward. Thank you.

Response O43-1

Comment acknowledged.

O44, Safe Energy Leadership Alliance, Dow Constantine

Comment O44-1

Please find attached the comment letter from members of the Safe Energy Leadership Alliance (SELA), an alliance of local, regional, state, and tribal officials from five states and British Columbia.

SELA

Safe Energy Leadership Alliance

November 30, 2015

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

[2] Proponent of the REG (formerly Imperium Terminal Service) Expansion Project.

RE: Draft Environmental Impact Statements (EIS) Scoping for Westway and Imperium Expansion Projects

To Whom It May Concern:

Thank you for the opportunity to comment on the Draft Environmental Impact Statements (DEIS) for the proposed Westway and Imperium Terminal Crude Oil Storage and Handling Expansion Projects proposed in the Port of Grays Harbor in Southwest Washington.

With the proposed expansion, Westway would handle up to 806 million gallons, including up to 751 million gallons of crude oil. Imperium could handle up to 1.3 billion gallons of bulk liquids, including crude oil. Trains would bring oil and other liquids to these facilities to be transloaded to ships and barges. Together, the proposed expansions are projected to generate over 1,000 additional train trips and 600 vessel trips annually.

We are members of the Safe Energy Leadership Alliance, more than 165 elected leaders from five states and British Columbia who are advocating for full assessment of costs and risks for oil terminal and coal export proposals that will bring significant rail traffic, health, and environmental risks to communities across our region.

We share concerns about catastrophic risks from oil train derailment, explosion and fire. Increased oil and coal trains already snarl traffic, delaying emergency vehicles, truck freight, and commuters at at-grade crossings. We are also connected by rivers, estuaries, and the coastal waters where a spill in one location would be carried by flowing water or tides over a large area, damage habitat and fisheries, and impair treaty rights.

We have the following concerns about the adequacy of the DEIS for Westway and Imperium:

- Geographic scope of analysis for health, safety, environment and traffic impacts of rail traffic is too narrow

The DEIS assessment of health, safety, environment and traffic impacts is focused primarily on local vicinity of the Puget Sound and Pacific (PS&P) rail line, the final 59 miles from Centralia to the project site. The risk of derailment, spills, fire, leaks, and "crude shrinkage" doesn't stop at an arbitrary distance from the project site; risks and impacts will span the entirety of the rail lines from oil fields to the project site. As the Draft EIS notes, oil will be transported at higher speed limits up to 40 mph on rail segments beyond the PS&P line, bringing higher risks of accident to communities outside the local area proposed for terminal expansion.

Similarly, the Draft EIS assessment of risk from oil spills to water focuses on Grays Harbor rather than the full route of vessel traffic from terminal to refineries. A detailed assessment of risk to fish and wildlife in Grays Harbor is definitely warranted, it should also extend along any potential vessel routes beyond the harbor.

Response O44-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment O44-2

- The Draft EIS understates traffic impacts

The draft EIS Rail Traffic Fact Sheet states that the draft EIS "looked at the PS&P rail line and modeled current and future rail traffic to find any impacts from increased trains from the proposed projects" and concluded that "No rail work would be required to move trains safely to and from the project sites." However, the same fact sheet notes significant increases in traffic blockages along the local PS&P line. For example, the Fact Sheet notes that from Centralia to Aberdeen, blockages would increase from 7 to 26 minutes a day to 40 to 59 minutes a day. We can only assume the crossings further up line would see delays. The final EIS should assess the impacts of increased gate-down time on movement of emergency vehicles, freight, and commuters for representative communities along the rail line from point of oil extraction to terminal (e.g., densely populated urban area, port city, major employment center, city with highways accessed by at-grade rail crossing). The EIS should include an assessment of type and cost of infrastructure improvements needed to mitigate for traffic and safety impacts of increased oil-by-rail traffic.

The Washington State Environmental Policy Act requires evaluation of direct, indirect, and cumulative impacts.

The Final EIS should assess cumulative impacts along rail lines serving the proposed Westway and Imperium expansions in conjunction with the other recent and proposed expansions of oil-by-rail capacity at Washington State refineries that would also impact feeder rail lines.

Response O44-2

Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, describes impacts of the proposed action on rail traffic in the study area, including rail line capacity and train occupancy times at grade crossings. Section 3.16, *Vehicle Traffic and Safety*, describes the potential impacts of increased rail traffic on vehicle traffic, including grade crossing delay and queuing at nearby intersections. Figure 3.15-6 shows select grade crossings east of Poynor Yard. For detailed vehicle delay information, refer to Section 3.16.5.2, *Proposed Action*, and Appendix L, *Vehicle Traffic Analysis*.

Chapter 6, *Cumulative Impacts*, presents the analysis of the incremental addition of impacts from the proposed action to impacts from past, present, and reasonably foreseeable future actions—

including the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project.

Refer to Response to Comment O44-1 regarding the assessment of impacts in the extended study area.

Comment O44-3

- The DEIS fails to assess and adequately address impacts to treaty fishing rights

The DEIS acknowledges the operation of the proposed terminals would impact the ability of the Quinault Indian Nation to conduct their treaty-fishery, and that a large spill along the PS&P rail line or a ship or barge would harm or kill wildlife or plants, and could affect tribal resources. While the DEIS notes that docking schedules could be managed to minimize fishing schedules, this would seem to put the onus on the Tribe to work around the vessel traffic and associated risks created by this proposal. The DEIS acknowledges that mitigation actions would reduce but may not completely eliminate impacts on tribal resources, but leaves uncertainty about the extent of impacts to tribal fishing. The Final EIS must include a detailed assessment of the impacts of the proposed expansion of Westway and Imperium on the ability of the Tribe to pursue treaty-protected harvest. If the impacts cannot be mitigated, and treaty rights are impaired, then the projects should be denied. Further, the Final EIS should identify risks to treaty-fisheries for other Tribes with usual and accustomed fishing areas along the full length of the rail and vessel routes that would serve the proposed terminals.

Response O44-3

Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, addresses potential impacts on tribal resources related to construction and routine operation of the proposed action. Refer to Response to Comment O44-1 regarding the assessment of impacts in the extended study area.

Comment O44-4

- Crude oil environmental health and safety risk assessment relies on uncertain federal, state and local government standards and investments to mitigate risk

At several points in the Draft EIS, the analysis notes reliance on existing federal and state requirements for federal and state laws for rail safety, oil spill planning, and oil spill response. The DEIS relies further on coordination of federal, state, and local oil spill and emergency response plans. However, federal and state standards have repeatedly proven inadequate to prevent train derailments, oil spills, and fires. Earlier this year, a federal study predicted that trains hauling crude oil or ethanol will derail an average of 10 times each year over the next two decades, causing more than $4 billion in damage and endangering the lives of people in densely populated areas. We know from first-hand testimony of SELA members that many local governments do not have the equipment, trained staff, or capacity to respond to an oil train derailment, spill, and fire.

The Final EIS must fully assess the risk and impacts of leaks and spills along the rail and vessel routes serving the proposed terminal expansion, including the worst-case scenarios for derailment, spill and explosion of a unit train along a major water body and in a densely populated urban area. In assessing risk, the EIS should consider types of crude oil to be transported, including volatile Bakken crude and heavy tar sands bitumen, each with different risks of explosion and clean-up

challenges. The EIS should also assess the increased financial burden to local governments for emergency planning, response and recovery associated with these increased risks of spill and catastrophic fire and explosion. Relying on current federal and state requirements, which are widely recognized as failing to prevent risks of spill, explosion and fire, is not acceptable.

Response O44-4

The approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances of an incident, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods. Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport in the extended study area qualitatively.

Comment O44-5

- The analysis of health impacts, both at the project site and along rail lines is inadequate

The Final EIS should assess health impacts associated with emissions from oil trains, both from combustion of diesel fuels by the trains and “crude shrinkage” along entire rail route serving the terminals. The final EIS should include a Health Impacts Analysis (HIA) that assesses disproportionate impacts to health and safety of people living and working close to rail corridors.

Hundreds of communities across our region will bear the burden of impacts to traffic, health, and environment and face catastrophic risks for spills and explosions from oil trains and spill from vessels serving the proposed facilities. The final EIS must be comprehensive, detailed, and reflect cumulative impacts along rail and vessel routes that are integral to the proposed terminal expansions. Mitigation for risk to public health and safety cannot rely on uncertain federal and state regulations that are known to be inadequate. Finally, the impacts on treaty fishing rights must be fully assessed and mitigated. If treaty rights are impaired, then the proposals should be denied.

Sincerely,

Dow Constantine
Executive
King County, WA
Chair of SELA

Alan Richrod
Councilmember
City of Aberdeen, WA

Wayne Roth
Councilmember
City of Bainbridge Island, WA

Michael Lilliquist
Councilmember
City of Bellingham, WA

Adrienne Fraley-Monillas
Council President
City of Edmonds, WA

Katherine Haque-Hausrath
Commissioner
City of Helena, MT

Kate McBride
Council President
City of Hood River, OR

Peter Corneilson
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City of Hood River, OR

Dennis Higgins
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Mark Gamba
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Bob Champion
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Christine Cook
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Chuck Puchmayr
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Don Stevens
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Stephen H. Buxbaum
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City of Olympia, WA

Nathaniel Jones
Mayor Pro Tem
City of Olympia, WA

Jim Cooper
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City of Olympia, WA

CaroleAnne Leishman
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City of Powell River, BC

Shannon Williamson
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City of Sandpoint, ID

Sally Bagshaw
Councilmember
City of Seattle, WA

Kshama Sawant
Councilmember
City of Seattle, WA

Shari Winstead
Mayor
City of Shoreline, WA

Doris McConnell
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Chris Roberts
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Jesse Salomon
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Ben Stuckart
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Ryan Mello
Councilmember
City of Tacoma, WA

Bart Hansen
Councilmember
City of Vancouver, WA

Strom Peterson
State Representative
21st Legislative District, WA

Jeanne Kohl-Welles
State Senator
36th Legislative District, WA

Jessyn Farrell
State Representative
46th Legislative District, WA

Joel Haugen
Councilmember
City of Scappoose, OR

Cc: Diane Butorac, Regional Planner, Southwest Regional Office, Department of Ecology

Response O44-5

See responses to detailed comments above. SEPA does not require that a formal health impact assessment be conducted as part of an EIS. The Draft EIS considers the following impacts related to human health. Final EIS sections have been revised, as noted below, to more fully describe these impacts.

- Chapter 3, Section 3.2, *Air*, describes potential impacts on air quality and the potential for increased cancer risk from emissions of diesel particulate matter related to construction and routine operation of the proposed action. The Final EIS section has been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on

information received from PS&P. The updated analysis predicts lower emissions; the level of increased risk is not considered significant.

- Chapter 3, Section 3.7, *Noise*, describes potential impacts on sensitive receptors near the project site and transportation corridors from increased noise and vibration related to construction and routine operation of the proposed action.
- Chapter 3, Section 3.16, *Vehicle Traffic and Safety,* describes potential impacts on public safety and emergency vehicle access from increased vehicle delay related to rail traffic from routine operation of the proposed action.
- Chapter 4, Section 4.7.1.7, *Human Health*, describes potential impacts of an oil spill on human health. The Final EIS section reflects a fuller description of these potential impacts.
- Chapter 4, Section 4.7.2.3, *Human Health*, describes potential impacts of a fire or explosion on human health. The Final EIS section reflects a fuller description of these potential impacts.

O45, San Juan Islanders for Safe Shipping, Shaun Hubbard

Comment O45-1

November 21, 2015

Westway and Imperium Terminal Services Expansion Projects EISs
c/o ICF International
710 Second Street, Suite 550
Seattle, WA 98104
Submitted via web comment form:
https://public.commentworks.com/cwx/westwayimperiumcommentform/

Thank you for this opportunity to submit comments on the Draft EISs for the two proposed oil terminals in Grays Harbor, Washington: Westway Terminal Company and Imperium Terminal Services.

I am writing on behalf of San Juan Islanders for Safe Shipping, a grassroots educational outreach and advocacy group in the San Juan Islands focused on shipping safety and oil spill prevention, preparedness, and response. San Juan Islanders for Safe Shipping formed in response to several proposals for new and expanding terminal projects that would increase the numbers of vessels in our waters and subsequently increase the risk of a major oil spill. Our members reside, work, and recreate on or in view of our marine environment. A major oil spill would directly and adversely impact our environment, economy, and quality of life.

Therefore, we are submitting our request that the Final Environmental Impact Statements (FEISs) for these two projects include an evaluation of the potential marine vessel related impacts of these proposed projects on the environment and economy of San Juan County.

San Juan County's air, water, fish, and fowl migrate over long distances on our planet. Thousands of species spend all or part of their life cycle in San Juan County, with 119 Salish Sea species listed as threatened, endangered, of concern, or candidates for listing. Their health directly affects our quality of our life in San Juan County. The impacts from the proposed Westway and Imperium Terminals do not exist in an isolated bubble that can be drawn only around the location of the proposed terminal. A terminal-specific or site-specific EIS will not adequately consider the cumulative impact of the

transportation, storage, shipment, and use of fossil fuels on the environment and the jobs that directly and indirectly depend upon a healthy Salish Sea ecosystem or upon the health of our citizens and visitors, and the local economy.

Response O45-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment O45-2

The DEISs include all the vessel traffic from these proposed projects in Grays Harbor entering the Salish Sea. This could be for bunkering purposes and/or to deliver crude oil to the refineries. If these projects were permitted, 638 additional crude oil tanker and tank barge transits would be passing through the Salish Sea each year. More vessel traffic means more risk of a major oil spill, therefore, we ask that the FEISs thoroughly address all of the projects' potentially adverse impacts to San Juan County's water environment, economy, and all of its species (human and otherwise).

The vessel traffic these two projects would produce, combined with the current vessel traffic projections for projects within the Salish Sea, would increase projected commercial shipping traffic by 48 percent (above 2013 levels). We ask the FEISs to include a cumulative impacts analysis of all existing, new, and "reasonably foreseeable" (proposed) vessel traffic in the Salish Sea.

Response O45-2

Refer to Response to Comment 045-1.

Comment O45-3

San Juan County's economy is inextricably connected to the beauty of its environment and the health of its ecosystems. Many islanders depend upon a healthy and sustainable salmon fishery and Orca

population. Jobs are directly tied to commercial and recreational fishing and shellfish farming. The tourist industry is the engine that runs our economy. People come to the San Juan Islands from all over the world to enjoy the beautiful environment and to see birds and sea life.

According to the San Juan County Economic Development Council, the quality of San Juan County's marine environment and natural resources are major drivers of the tourism, construction, real estate, and retail industries that represent nearly 80% of San Juan County's total economy. A projects-related oil spill in the Salish Sea would have a devastating effect on our islands' economic well being and quality of life. The projects would bring 139 operational jobs to the Grays Harbor community, but at what risk to the rest of the region's jobs that depend upon our marine ecosystem? We ask that the FEISs include cost-benefit analyses for all the cities and counties that would be affected by the proposed projects, including the costs associated with oil spills, and Canadian oil sands/diluted bitumen spills in particular.

Southern Resident Killer Whales (SRKW), also known as Orca whales, are San Juan County's icon. These charismatic marine mammals are loved by our residents and are a major tourist attraction and economic driver for San Juan County. The Southern Resident Killer Whale was listed as endangered in 2005. Since then the National Oceanic and Atmospheric Administration (NOAA) has funded studies of SRKWs to better understand how they can be protected.

It is well-established that Southern Resident Killer Whales spend much of the summer near the San Juan and Canadian Gulf Islands, but since 2011 NOAA has tracked the winter travels of the Orca whales along the outer coast from Northern California to the Strait of San Juan de Fuca, spending much of their time outside the mouth of Grays Harbor, presumably feasting on Chinook salmon from the local rivers. The Chinook salmon is the preferred food of the SRKWs and their birth rates are strongly correlated with the abundance of this particular salmon species.

Please see: NOAA 2015 Southern Resident Killer Whale Satellite Tagging: http://www.nwfsc.noaa.gov/research/divisions/cb/ecosystem/marinemammal/satellite_tagging/blog2015.cfm

San Juan County jobs are directly tied to our SRKWs and also to fishing and shell fishing, both commercial and recreational. The Treaty of Point Elliott of 1855 guarantees the tribal "right of taking fish at usual and accustomed grounds." For these important facts, we ask that the FEISs thoroughly address oil spill risk and associated adverse impacts to tribal treaty protected rights in the Salish Sea, and all adverse impacts to tribal, commercial, and recreational fishing and shell fishing.

Response O45-3

Refer to Response to Comment 045-1.

Comment O45-4

We ask that the FEISs address all potential adverse impacts to all the 119 species-at-risk in the Salish Sea (including the SRKW), their migratory pathways and their critical habitats.

We ask that the FEIS address the adverse impacts to Chinook salmon from the construction and the on-going operation of the proposed Westway and Imperium Terminals and associated rail lines, docks, ship loaders, and equipment and the adverse impacts to Chinook salmon from the on-going adverse impacts to water quality from storm water runoff.

Response O45-4

The applicant currently plans to receive crude oil by rail from the Bakken fields in North Dakota or Canadian tar sands/diluted bitumen.

Comment O45-5

We ask that the FEISs require oil spill contingency plans to include the proper equipment and personnel to respond to a spill of the especially volatile, sinkable, and toxic Canadian oil sands/bitumen crude. Please study the impacts of a spill of this particular type of oil. Please identify worst-case spill scenarios and the associated cleanup costs of this particular type of oil.

We look forward to Final EISs that address all of our comments with in-depth analysis and with reasonable alternatives identified, including the no-build option. Should the projects be permitted, all feasible mitigation measures should be required to be implemented.

Thank you for this opportunity to comment on the Draft EISs for the proposed Westway and Imperium Terminals.

Sincerely,

Shaun Hubbard, Member
San Juan Islanders for Safe Shipping

Response O45-5

As noted in Chapter 4, Section 4.2, *Applicable Regulations*, contingency plans require the development of response strategies specific to the type of crude oil being handled, stored, or transported. The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

O46, Sierra Club Upper Columbia River Group, W. Thomas Soeldner

Comment O46-1

Upper Columbia River Group
Box 413
Spokane, Washington 99210

November 30, 2015

Washington Dept. of Ecology and City of Hoquiam
c/o ICF International

Transmitted via on-line comment form

Re: Westway & Imperium Terminal Services Expansion Project DEIS's

Dear Dept. of Ecology and City of Hoquiam:

The Upper Columbia River Group of the Sierra Club submits these comments regarding the inadequacy of the Westway and Imperium oil terminal proposal draft Environmental Impact Statements with respect to potential impacts in Spokane, Washington. This letter addresses both projects and should be made a part of the record for both the Westway and Imperium DEIS's.

Our concerns are based on the lack of adequate information and analysis regarding potential impacts to the Spokane, Washington region. As noted in the DEIS's, the oil terminals will receive oil product—either Bakken crude oil or Alberta tarsands bitumen - via rail. All of this product will be transported to Grays Harbor via rail line coming through Spokane. In Spokane, the rail corridor is a bottleneck that already receives heavy train traffic carrying all manner of materials and goods, including oil, coal, grain, lumber and manufactured items. The rail line traverses the Rathdrum Prairie and Spokane Valley, and is then elevated on a single corridor coming directly through downtown Spokane. This elevated rail line sits atop antiquated infrastructure, including several dozen short tunnels and abutments that allow auto and truck traffic to cross below the rail grade. This rail corridor extends the entire length of the downtown Spokane area. To travel in a north-south direction through Spokane, one must travel under one of these overpasses.

It is our contention that the Spokane-area environmental impacts of the proposed Westway and Imperium oil terminals are substantial and adverse and cannot be mitigated. We therefore ask you to deny the permits for this project. At a minimum, the DEISs do not adequately identify and analyze the impacts discussed below, and should therefore be rejected as insufficient.

The graphic below shows how rail traffic is consolidated and routed through the City of Spokane [Graphic of rail traffic routing through Spokane].

Response O46-1

Refer to the Master Response for Geographic Scope of the EIS. The approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances of an incident, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment O46-2

Our concerns are fourfold:

(1) Cumulative Impacts of Multiple Oil and Coal Train Proposals

The DEISs fail to describe or analyze the cumulative impacts of the increase in rail traffic in Spokane that would be caused not only by the Grays Harbor project, but by the multiple proposals for oil and coal terminals throughout western Oregon and Washington, which would also receive product via rail line coming through Spokane. Even casual observation of the multiple trains that daily travel through the Spokane rail corridor reveals heavy traffic and routine delays both on the rail line and to auto and truck traffic (including emergency vehicles) that must cross the tracks at grade in the Spokane Valley and east of town, particularly in Cheney. The DEISs are deficient in failing to analyze whether it is even possible to increase rail traffic proposed for the Grays Harbor projects when added to existing traffic and then added to the Portland, Vancouver, Longview, and Bellingham coal and oil export terminal proposals.

The graphics below show (1) the number and location of oil train terminals existing and proposed in Washington and Oregon and (2) how all Bakken Formation oil being transported to Oregon and Washington must be routed through Spokane. [Graphics reviewed but not reproduced.]

The graphic below shows the full extent of increases in oil and coal train traffic that would occur in Spokane should all proposed terminals be built in western Washington and Oregon. [Graphic reviewed but not reproduced.]

Response O46-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area

Comment O46-3

(2) Oil Train Accidents in the Downtown Spokane Core.

The DEISs do not discuss the potential risks of oil train accidents, explosions, fires and spills and the consequent damage that would cause to Spokane's urban core. You have already received comments from the Friends of Grays Harbor and Quinault Indian Nation regarding the potential risks of transporting oil by rail. We concur in those studies and analyses. Bakken Formation oil is a highly flammable and dangerous material, and an accident in Spokane could be disastrous, affecting thousands of people. Further, the Spokane rail corridor has seen accidents in the past, both with rail cars falling from the tracks and large trucks colliding with the abutments that hold up the elevated track through downtown Spokane.

The photos below show a 1991 train derailment on the elevated tracks near the Latah train bridge, at the eastern end of downtown Spokane. [Photo reviewed but not reproduced.]

The photo below shows a 2011 semi-truck accident at the rail overpass at Trent and Helena Streets in Spokane. [Photo reviewed but not reproduced.]

(3) Air Quality Impacts of Oil Train Transport.

The DEISs do not discuss the impact on air quality in Spokane that would be caused by an increase in rail traffic caused by the projects and cumulatively. Oil trains are transported by diesel-powered locomotives that spew diesel particulate matter, nitrogen oxides, and other toxic pollutants into the atmosphere. Spokane is subject to weather inversions—for example an air stagnation advisory is in effect today, November 30, 2015 for the next three days—that trap these pollutants at ground level, posing public health concerns. Further, the rail corridor runs just a few blocks from numerous Spokane and Spokane Valley schools and hospitals—thus posing direct air quality risks to youth and those who are at special risk of asthma and other respiratory conditions. (See "Route of Rail Traffic" graphic above.) While air stagnation advisories lead to burn bans, the trains keep running.

(4) Water Quality Impacts of Oil Transport.

The DEISs do not discuss the risks associated with oil spills in the vicinity of the Spokane Valley-Rathdrum Prairie (SVRP) Aquifer. The SVRP Aquifer is the sole source of drinking water for 500,000 people and businesses in the Spokane-Coeur d'Alene region. The Aquifer is highly vulnerable to contamination because of the porous, unconsolidated materials that lie atop it and comprise the aquifer itself. The Aquifer is also highly transmissive, and pollutants that reach groundwater move quickly and are very difficult to control and remove. An oil spill that soaks into the ground would cause significant disruption of water supply for the entire region. Further, the rail lines in this region make multiple crossings over the Spokane River and Hangman (Latah) Creek. An oil spill would cause immediate and significant damage to these surface water bodies.

The map below shows the aerial extent of the SVRP Aquifer in Idaho and Washington. The rail corridor runs from Lake Pend Oreille to Spokane and then east, traversing the full northeast-to-southwest extent of the Aquifer system.

[Map reviewed but not reproduced.]

The graphic below shows the wellhead protection zones for the many public water supply wells that penetrate the SVRP aquifer, showing two-year time-of-travel locations for contamination plumes. Almost anywhere an oil train spill could occur within the Spokane Valley-Rathdrum Prairie region would be within the contamination zone of one or more wells.

[Graphic reviewed but not reproduced.]

The photo below shows a 2002 spill of crude oil that was being transported by train, just east of Rathdrum, Idaho. The impact to SVRP Aquifer groundwater from this accident was minimized because the ground was frozen and the spilled oil was retrieved before percolating into the aquifer zone.

[Photo reviewed but not reproduced.]

Conclusion

The impacts of the proposed crude-by-rail terminals in Grays Harbor are inseparable from impacts to the Spokane region. The failure of the DEISs to fully identify and describe Spokane-area impacts means that irreversible impacts are not identified and mitigating actions, to the extent appropriate, will not be taken. As such the documents are deficient.

For the foregoing reasons, Sierra Club Upper Columbia River Group respectfully requests that you reject the DEISs as inadequate in their discussion of environmental impacts to the Spokane region, and that you deny the substantial development permits for the Westway and Imperium crude-by-rail proposals.

Thank you,

W. Thomas Soeldner
Co-Chair, Sierra Club Upper Columbia River Group

Response O46-3

Refer to the Master Response for Geographic Scope of the EIS.

The approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances of an incident, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods

O47, Spokane Riverkeeper, Jerry White Jr.

Comment O47-1

October 8, 2015
Aberdeen, WA

RE: Draft Greys Harbor EIS Comments
TO: Department of Ecology and City of Hoquiam
From: Jerry White, Jr., Spokane Riverkeeper

> The Spokane Riverkeeper is an advocate charged with ensuring that Clean Water laws are followed and the Spokane River remains fishable and swimmable.

The Construction of the Westway Imperium projects is intimately connected to the health and safety of our community, our drinking water and our river. In fact the project directly threatens all three. The DEIS states that “No mitigation measures would completely eliminate” the possibility of spills and fires stemming from train derailments. This statement coupled with the increased traffic that the project would create, makes the risks to our community unacceptable.

Response O47-1

Comment acknowledged.

Comment O47-2

- Crude oil rail transportation and the Spokane River (do not read)

Burlington Northern and Santa Fe Rail Road has lines that cross our river in at least three places and is within the .5 miles of the river for several miles. Spring River flows are often very high and there is no practical or safe way for first responders to deploy booms in the event of an oil spill. Within hours, the oil would travel for miles downriver, wreaking havoc on aquatic ecosystems and ruining its recreational capacity for years.

Response O47-2

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment O47-3

- Crude oil rail transportation and the Spokane Rathdrum Prairie aquifer (do not read)

Additionally, the BNSF rail lines run within 100 yards and up-slope from an exposed section of our EPA Designated Sole Source of drinking water, the Spokane Rathdrum Prairie Aquifer. How would long term clean-up efforts succeed if Bakken crude were to penetrate our drinking supply? Again the DEIS is silent.

Response O47-3

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Final EIS Chapter 5, *Extended Rail and Vessel Transport*, further describes the potential risks associated with rail transport in this area.

Comment O47-4

- W & I Project Impacts to noise and Public Health (do not read)

As stated above the BNSF rail lines travel through the heart of our Spokane Valley. These trains deliver large amounts of diesel exhaust. In the winter months temperature inversions trap air

pollution and particulates in our community for weeks. Our community has been the focus of a decade's long struggle to clean its air up. Again the DEIS does not address the impacts of this project.

Response O47-4

Refer to the Response to Comment O47-3.

Comment O47-5

- Impacts Climate Change

The DEIS states that the project would have a 2.6% increase on greenhouse gas emissions from rail in Washington. The cumulative impacts of greenhouse gasses produced by this project reach far beyond the project area. Projections call for the complete loss· of the snowpack that feeds our river by 2080 if we do not reduce carbon emissions. The development of the W & I Project will only exacerbate effect.

Response O47-5

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, acknowledges that greenhouse gas emissions from the cumulative projects would contribute to global greenhouse gas emissions, which contribute to climate change, and describes the projected impacts of climate change in the Pacific Northwest.

Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, reflect greenhouse gas emission estimates from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment O47-6

- Community Safety

Finally, the BNSF Rails lines run through the heart of our urban down-town core on rails that are elevated above the streets making a derailment almost certainly catastrophic and nearly impossible for first responders to cope with. Again the DEIS is silent on addressing these risks to our people and our infrastructure.

Response O47-6

Refer to Response to Comment O47-3.

Comment O47-7

In conclusion, the DEIS is too narrow in its scope and is flawed in that it does not consider the incredible impacts to the Spokane River and our community.

If the Projects go forward Spokane is being asked to risk its social, economic treasure if these projects go forward. This is unacceptable.

Thank you for the opportunity to comment
Jerry White, Jr.

Response O47-7

Comment acknowledged.

O48, Spokane Riverkeeper, Jerry White Jr.

Comment O48-1

Spokane Riverkeeper

Clean River Healthy Community

November 30, 2015

ATT: Comments on DEISs for the Westway and Imperium Expansion Projects

Diane Butorac
Regional Planner
Southwest Regional Office
Department of Ecology
PO Box 47775
Olympia WA 98504

Dear Diane Butorac,

The Spokane Riverkeeper is a community advocate charged with ensuring that Clean Water laws are followed and policies are developed that promote a fishable, swimmable Spokane River. In short, our program advocates for the health of our river and its tributaries and the public use of the river.

Union Pacific and Burlington Northern and Santa Fe Rail lines parallel the Spokane River for nearly 22 miles inside the State of Washington and run alongside one of our healthy tributaries for another 3 miles. The rails also cross a Hangman Creek which is already impaired for temperature, turbidity and bacteria and the focus of much public and agency activity to recover it. Additionally, the rail lines run through the down town core of Spokane with a population or 250,000 people and run through the Spokane Valley which is populated by another 100,000 people, many of whom live adjacent to these rail systems. Further, these rail lines run within several hundred feet of our EPA designated sole source, drinking water supply, the Spokane Valley Rathdrum Prairie Aquifer where it is exposed in the Spokane Valley. The BNSF and Union Pacific rail lines service loaded trains running west to oil by rail facilities on the west coast and the empty trains that run back to the mid-west for reloading.

Because the rail traffic generated by the proposed Westway and Imperium Expansion Projects would increase rail traffic by an estimated 9 additional loaded and unloaded trains per week and because these trains would run over our river and through our community, the construction of the Westway and Imperium Expansion Projects are directly connected to the health and safety of our community, our drinking water, and our river. In fact, the proposed project has the potential to cause more than moderate harm. As such, these potential risks should be incorporated into the Draft Environmental Impact Statement (DEIS).

Crude oil rail transportation and the Spokane River

[Photo of oil train crossing Spokane River near E. Indiana St, Spokane Valley reviewed but not reproduced.]

Union Pacific and Burlington Northern and Santa Fe Rail Road has lines that cross our river in at least three places, running parallel to the river for over 20 miles and running within the .5 mile wide "blast Zone" for several miles in the urban core of Spokane and the City of Spokane Valley. With the increased demand for crude oil from this project, we could see an additional 7000 barrels per day of Bakken crude oil transported by rail over our river and its tributaries. Our river is vulnerable for several reasons. Spring river flows are often in excess of 20,000 cubic feet per second. Given this tremendous flow and the rugged river banks downstream from the rail crossings over the Spokane River, there is no practical or safe way for first responders to deploy booms on a river anywhere near several of the bridge locations (See above photo). Within hours, the oil would travel for miles downriver, wreaking havoc on aquatic ecosystems and ruining its recreational capacity for years. This reach of the river is home to native redband trout (O. Mykiss) which is listed as a "Species of Concern" by the US Fish and Wildlife Service (http://www.fws.gov/pacific/fisheries/IntRedbandTrout.cfm) and listed as a "Priority Habitat Species" by the Washington State Department of Wildlife. The sections of the river where oil trains cross are spawning areas, rearing areas, and aquatic thermal refuges for these fish during the summer. We know that the effect of either Bakken crude oil or the diluted bitumen oil from the Tar Sands is extremely harmful to aquatic ecosystems. Michigan's Kalamazoo River and the Enbridge Inc. pipeline spill of bitumen crude oil in 2010 provide a case study in just how enormous the impacts are on aquatic ecosystems and how expensive and onerous the costs of clean up are. (See http://goo.gl/cWcge8 and http://goo.gl/LSVdY3). The pipeline spill into the Kalamazoo River was estimated to be nearly 1,000,000 gallons and for perspective, one single oil train carries as much as 2.9 million gallons of crude oil. According to the National Transportation Safety Board, the Kalamazoo River was the costliest onshore clean-up project in US History. If a unit train of Alberta tar sands diluted bitumen crude or Bakken crude oil spilled even half of its cargo in route to the Westway and Imperium facilites it would exceed the volume of the Kalamazoo spill of 2010.

Given the enormous risks to the aquatic ecosystems of the Spokane River it is inappropriate that the potential spill impacts (both financial and biological) presented by the proposed Westway and Imperium Expansion Projects are not examined in detail in the draft Environmental Impact Statements. They need to be fully examined and addressed.

Crude oil rail transportation and the Spokane Rathdrum Prairie aquifer

Additionally, near Fancher Road in the Spokane Valley, the BNSF rail lines run within 100 yards and up-slope from an exposed section of our EPA Designated Sole Source of drinking water, the Spokane Rathdrum Prairie Aquifer (SVRPA). (see below map). A spill or an oil fire on these rapidly moving drinking water sources would contaminate this source of water for several hundred thousand people in the Spokane River Valley and the West Plains of our County. Both the diluted bitumen crude oil from the Alberta tar sands and the crude oil from the Bakken fields contain hydrocarbons and known carcinogens. They are highly toxic and one gallon of oil can render 1,000,000 gallons of drinking water unpotable. Given the enormous risk that the proposed projects and consequent rail traffic poses to our drinking water supply, the DEIS should address the impacts of various sized crude oil spills on the Spokane Valley Aquifer. The prevention and emergency response to such a crisis needs to be addressed and studied in the proposed Westway and Imperium Expansion Projects DEISs.

Response O48-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action

Comment O48-2

Shell and Anacortes Project impacts on public health and quality of life

[Photo of BNSF Rail Lines SVRPA; reviewed but not reproduced.]

As stated above, Union Pacific and BNSF rail lines travel through the heart of our downtown corridor in Spokane as they do in the towns of Millwood and Spokane Valley. These trains deliver large amounts of diesel exhaust. In the winter months our valley suffers severe air quality problems due to its temperature inversions. These inversions trap air pollution and particulates and leave our community exposed for weeks. According to the Spokane Regional Clean Air Authority (SRCAA), Diesel particulate pollution is responsible for numerous public health issues in our community. (SRCAA Fact Sheet: https://goo.gl/OApXP3)

SRCAA Fact Sheet Excerpt:

"What is the concern with diesel pollution?"

Diesel exhaust is made up on tiny, highly toxic particles that penetrate our lungs and remain there indefinitely to create and/or worsen both heart and lung conditions. Exposure to diesel particles is linked to immediate and long-term health effects, including:

- irritation of the eyes, nose and throat
- coughing, laboured breathing, chest tightness and wheezing
- making healthy children and adults more susceptible to developing respiratory conditions

- increased risk of heart attack or stroke for those with pre-existing heart disease or circulatory problems
- lung cancer"

According to the SRCAA, diesel exhaust is currently responsible for 12% of the particulate pollution in the Spokane Valley. If oil train traffic increases by 9 loaded and unloaded trains per week, our city is going to feel the impacts of this traffic with increasing public health problems and increasing problems with air quality. This is clearly an impact to our community that should be addressed in the DEISs.

Additional issues resulting from the proposed Westway Imperium Projects include traffic problems for the public, for emergency first responders, school busses, commercial trucking traffic, commuters and others. Rail traffic already causes traffic to idle for hundreds of hours a month. There are over 75 road and rail intersections in the Spokane Valley. Long waits due to rail obstruction is a regular occurrence for those who live and work in the Spokane Valley. The City of Spokane Valley has studied the Barker Road crossing and calculated there are 23,100 hours of vehicle delay annually on that one intersection alone. This translates to 232 tons of air pollution a year from idling cars. The proposed Westway and Imperium Expansion Projects would increase rail traffic by another 9 (loaded and unloaded) trains per week and therefore pose direct and negative impacts on the people of our community. The Draft Environmental Impact Statements do not address these impacts.

Response O48-2

Refer to Response to Comment O48-1.

Comment O48-3

Impacts Climate Change

The cumulative impacts of greenhouse gasses due to the proposed Westway and Imperium Expansion Projects would reach far beyond the project area. In fact, the impact on our Spokane River cannot be denied nor understated and needs to be addressed in the DEISs. This year the snow pack in the Idaho Mountains that feed our river was roughly 86% of average and ran off early due to extremely warm temperatures. We have never seen these low flow patterns in our river in recorded history. Projections call for the complete loss of the snowpack that feeds our river by 2080 if we do not reduce carbon emissions. To expand the capacity to burn oil is to actively destroy our river. Our citizens and our businesses are being deprived of a community asset that has been the foundation our culture, economics and history since its founding. The impacts of greenhouse gas emissions on the part of the Westway and Imperium Expansion Projects on our river should be addressed in the DEISs.

Response O48-3

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, acknowledges that greenhouse gas emissions from the cumulative projects would contribute to global greenhouse gas emissions, which contribute to climate change, and describes the projected impacts of climate change in the Pacific Northwest.

Draft EIS Chapter 3, Section 3.2.5.2, *Proposed Action*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively. The Final EIS expands the emission estimates to include those from offsite transport from the likely source of crude oil to the furthest likely refinery destination.

Comment O48-4

Community Safety

Finally, the BNSF Rails that carry the crude oil for the Westway and Imperium Expansion Projects would travel run through the heart of our urban down town core. Further, these are on rails that are elevated above the streets making a derailment almost certainly catastrophic and nearly impossible for first responders to cope with for several days. Bakken crude oil has been shown to be volatile and extremely dangerous. There are over fifteen rail bridges over our urban, down town and many of them are in disrepair. Ramping up oil traffic by 4 to 6 loaded trains a week is essentially asking our community to risk catastrophic spills and fires.

[See original comment for photo of Urban Spokane Rail bridges and map of Urban Spokane Rail bridges]

The nation has seen over 10 derailments and fires of crude oil trains since 2010. There is a very real concern that with the projected increase in rail/oil traffic due to the Westway and Imperium projects pose the risk of a catastrophic derailment and fire in our down town urban core. The impacts of such a catastrophe should be incorporated into the DEIS if we are to actually understand the risks that this proposed project holds for Spokane and the Spokane Valley.

[Photo of degraded rail infrastructure and bridges, in the down town Spokane urban core; reviewed but not reproduced.]

In conclusion, the proposed Westway and Imperium Expansion Projects have an enormous scope that is regional in nature with numerous potential impacts to the Spokane community and the Spokane River. All of these potential impacts need to be considered in the DEISs. Currently they are not. We encourage you to recognize this deficiency, address the inter-connectedness of the proposed projects to our community and provide an environmental impact statement that encompasses all potential impacts of this proposed oil-by-rail system on our community and our river.

Thank you for the opportunity to comment.

Respectfully,

Jerry White, Jr.

Spokane Riverkeeper
Community Building
35 W. Main St Suite 300
Spokane WA 99201
jerry@cforjustice.org

Response O48-4

Comment acknowledged.

O49, Spokane Riverkeeper, Jerry White Jr.

Comment O49-1

Greetings. I'm here representing Jerry White from Spokane, Washington, who is unable to be here due to last minute difficulties. He represents Spokane Riverkeepers. He is an advocate making sure that the clean water laws are followed and the Spokane River remains fishable and swimmable. The construction of the Westway and Imperium project threatens the health and safety of our community, our drinking water, and river. The project threatens all three.

The DEIS states that no mitigation measures can completely eliminate the possibility of spills and fires coming from train derailment.

The increased traffic that the project will create makes the risks to our community unacceptable.

Impact of climate change, the DEIS terminal project which has 2.6 increase in greenhouse gas emissions in the rails of Washington. Greenhouse gases produced by this project reach far beyond the project area. Developing the Westway and Imperium projects will only increase greenhouse gas.

Community safety, BNSF rail line runs through Grays Harbor downtown. I will submit this in writing. In conclusion, the DEIS is too narrow. The scope does not consider the incredible impact to our local community if the project goes forward. Spokane cannot risk its economic treasure if these projects go forward. This is unacceptable.

Thank you.

Response O49-1

Comment acknowledged.

O50, Surfider Foundation, Gus Gates

Comment O50-1

Thank you for the opportunity to provide public testimony here today. For the record my name is Gus Gates, and I'm from the County of King, and the city of Seattle.

I'm working for the Surf Rider Foundation and speaking today on behalf of our five chapters throughout the state of Washington.

Specifically to the DEIS, we're really excited to see a whole chapter dedicated to the topic of recreation. That's pretty near and dear to our hearts. But that quickly turned to disappointment when we realized that you didn't incorporate the study that we completed this spring and sent to you guys.

In that, if you read it, you know there was some real important work showing where those recreational uses occur up and down the coast. In the $481 million that are coming into our state economy every year through direct trip expenditures, 4.1 million visitors came to the Washington

coast last year and 36 percent of those visits came right here to Grays Harbor County. This is a hot spot for coastal recreation in Washington and a huge economic driver not only for our local jobs but for our quality of life.

So, you know, this failure to incorporate this is really, you know, a failure to incorporate the best available science. And I'll take the answer offline for why you wouldn't do that, but we're looking forward to getting that into the final.

If you read the report you know that wildlife viewing from both land and boat is one of the main recreational uses that occurs here. Specifically whale watching.

And we know that northbound cow calf, gray whales migrate much closer to shore than what you've acknowledged in the DEIS, and thus a significant gap.

Also this summer we witnessed humpback whales right in the harbor mouth. The increase in vessel traffic as a result of this, you know, greatly increases the probability of vessel collision and death, you know. This additional study is needed in the future. So we look forward to seeing that in the final.

Response O50-1

Final EIS Chapter 3, Section 3.5.4.3, *Grays Harbor*, clarifies whale use of Grays Harbor and provides additional information on gray whales, humpback whales, and killer whales. Draft EIS Section 3.5.5.2, *Proposed Action*, addresses potential vessel collisions with marine mammals.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

O51, Surfider Foundation, Gus Gates

Comment O51-1

November 20th, 2015

Gus Gates
Washington Policy Manager, Surfrider Foundation
5136 S. Frontenac St.
Seattle, WA 98118

Westway & Imperium Expansion Projects DEIS
c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

SUBJECT: Comments Regarding The Westway & Imperium Expansion Projects DEIS

Thank you for the opportunity to provide written comment on these two major projects, as well as the extension of the comment period deadline. Below are specific comments, concerns, and shortcomings that we have identified with the DEIS as written. In summary, the significant impact on recreational resources, marine mammals and wildlife, and the threats to community resilience when a spill occurs all lead us to strongly support the no-action alternative.

Impacts to Recreation

3.10.3 How were impacts on recreation evaluated? 3.10.3.1 Information Sources

"Information about recreational uses and areas in the study area was obtained from the Washington Department of Fish and Wildlife (WDFW), local planning documents, scoping comments, personal communications with local planners, and a review of aerial photography. Additionally, a site visit to observe and verify recreational uses of the project site occurred on August 13th, 2014."

The section on recreation is heavily skewed towards extractive recreational fishing. The DEIS does an adequate job of highlighting the recreation areas and access points within the harbor, but fails to account for the broader scope of recreation along the outer coast, and the importance of Grays Harbor as a major hub for non-consumptive recreation in the state of Washington. Making observations on just one day in August is totally insufficient. If built as proposed, there will be a decrease in community revenue associated with the displacement of recreational users along with a decreased quality of recreational experience, this needs to be further evaluated before the final EIS is released.

In May of 2015 we sent via email to the Department of Ecology (receipt acknowledged) our recently published study on non-consumptive recreation along the Washington Coast which provides an economic and spatial baseline of the various uses in the bay and along the coast, and yet this study was not incorporated at all in the DEIS, we would like to see this information included into the final EIS.

If the study had been incorporated, one would know that in 2014, Washington residents took an estimated 4.1 million trips to the Washington coast, with nearly 60% saying the primary purpose was for recreation. Average respondents spent approximately $111.14 per trip, translating to an estimated $481 million in direct trip expenditures. 35.6% of the 4.1 million trips were taken to Grays Harbor County. Beach going, sightseeing/scenic enjoyment, wildlife viewing, and photography were the most popular activities coastwide, with some of the highest rates of activity found along the shorelines of Grays Harbor County and the ocean and estuary coastlines. The full report can be downloaded and incorporated into the Final EIS by visiting: https://washington.surfrider.org/rec-use/

Response O51-1

Draft EIS Section 3.10, *Recreation*, identifies recreational fishing as well as other existing recreational uses such as hiking, biking, picnicking, wildlife viewing, bird watching, whale watching, beachcombing, boating, canoeing, kayaking, horseback riding, vehicle off-roading, wave riding, and surfing within the study area. Per the requirements of SEPA (WAC 197-11-400), the Draft EIS focuses on the elements of recreational resources that are more likely to be affected, such as recreational fishing, and summarizes those elements that are less likely to experience impacts.

As noted in Draft EIS Chapter 3, Section 3.10.3.1, *Information Sources*, a number of other sources were considered for the analysis, in addition to the site visit. These include information from the Washington Department of Fish and Wildlife, local planning documents, scoping comments, personal communications with local planners, and a review of aerial photography.

Refer to Draft EIS Chapter 3, Section 3.10, *Recreation*, for an analysis of impacts on recreation in the study area. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for

information on the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

The document identified by the commenter was reviewed and considered but not included in the Draft EIS. While this document provides detailed information on recreational opportunities and uses in Washington State as well as Grays Harbor County, it does not speak directly to the study area and was not considered applicable to the Draft EIS.

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively.

Comment O51-2

Whale Watching & Increased Probability for Vessel Collision, Extinction

As mentioned above, whale watching and wildlife viewing is one of the most popular recreational activities along the Washington coast, and especially within the Grays Harbor area as one of only a few ports along the coast.

"Whale watching off the coast of Washington peaks between March and May as gray whales migrate between feeding grounds in the North Pacific and breeding lagoons in Baja California. During the early spring, Pacific gray whales can be spotted approximately 2 miles beyond the entrance to Grays Harbor, from the north jetty, or from one of the many chartered whale-watching boats departing from Westport. "

"Several ESA-listed whale species may occur off the Washington coast near Grays Harbor. These include blue, fin, and sei whales (Balaenoptera musculus, B. physalus, and B. borealis, respectively), sperm whale (Physeter macrocephalus), killer whale (Orcinus orca), and humpback whale (Megaptera novaengliae), all of which are federally listed and state-listed as endangered. Other whale species that may occur in the waters off Grays Harbor are the pygmy sperm (Kogia breviceps), common minke (Balaenoptera acutorostrata), and the state-listed sensitive gray whale (Eschrichtius robustus). The occurrence of these species in the coastal waters of Washington State ranges from exceptionally rare (blue whales) to relatively common (humpback whales) (Carretta et al. 2011 in U.S. Army Corps of Engineers 2014: 88)."

The presence and importance of whale watching locally is acknowledged, but is incorrect and greatly understates the location and frequency of Pacific gray whales, humpback whales, and Southern Resident population of Killer Whales (All ESA listed) in proximity to the project site, harbor entrance and increased vessel transit. This past July, Surfrider staff members personally witnessed several gray whales within the harbor, as well as multiple humpback whales within a mile of the entrance. Several other commercial and recreational fishermen have witnessed the same occurrence over numerous years and have made public statements accordingly, yet this information was not incorporated into the DEIS. How many gray whales are residing and foraging locally in the summer months? What is the increased probability for vessel collision with the proposed increase in vessel transit with tankers and barges associated with this project? Before releasing the Final EIS, a robust study of presence/absence of whales in this area should be undertaken and calculations made for the increased probability for vessel collision. The increased probability for vessel collision is acknowledged below, but as stated previously, the location and frequency of these whales in

relation to vessel transit and the proposed project area is incorrect, this warrants further study before a final decision is made.

"Collisions with ships are one of the primary threats to marine mammals, particularly large whales, along the U.S. west coast, and around the world. Related to the proposed action, the greatest potential for vessel strikes to occur would be in the shipping lanes, which are located outside of state waters (farther than 3 nautical miles from the coast). This is because large mammals, like whales, typically migrate and forage in deeper waters and are not likely to enter the harbor. However, there is some potential for vessels to strike marine animals within the study area, particularly during transits outside the harbor but within 3 nautical miles of the harbor mouth. Depending on the circumstances (i.e., vessel speeds, vessel type, type of animal, animal behavior), the impacts could vary widely, but could include bone fractures, organ damage, and internal hemorrhages (National Oceanic and Atmospheric Administration 2008a:4). There are cases in which small marine mammals survived strikes but sustained injuries and disfigurement to dorsal fins and other body parts (National Oceanic and Atmospheric Administration 2008a:17). In Sarasota Bay, Wells and Scott (1997 in National Oceanic and Atmospheric Administration 2008a:17) documented four cases of vessel strikes on bottlenose dolphins in which all four animals survived the strike. The potential for strikes in the study area would be somewhat greater compared with the no-action alternative because of the increase in vessel trips."

Response O51-2

Final EIS Chapter 3, Section 3.5.4.3, *Grays Harbor,* clarifies whale use of Grays Harbor and provides additional information on gray whales, humpback whales, and killer whales. Draft EIS Section 3.5.5.2, *Proposed Action*, addresses potential vessel collisions with marine mammals. Final EIS Section 3.5.5.2 clarifies that marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a higher risk from vessel strikes and further describes the potential for an incremental increase in risk with the increase of vessels related to the proposed action.

Comment O51-3

The loss of community revenue related to trip expenditures from a decrease in whale watching needs to be evaluated. Killer whales are extremely vulnerable, and are known to visit areas in close proximity to the harbor entrance. "One major oil spill will tip the Southern Resident population of Killer Whales to extinction" Don Noviello, Washington Department of Fish and Wildlife, personal communication Nov. 16th 2015. This is an un-mitigatable impact and therefore the precautionary principle should be applied and support given to the no-action alternative.

Response O51-3

Comment acknowledged.

Comment O51-4

Coastal Hazards, Climate Change, and Community Resiliency

Both proposed expansion projects are located within significant earthquake and tsunami inundation areas, as recognized in the DEIS documents. It is currently estimated that there is a 10-15% probability of a major Cascadia subduction earthquake occurring in the next 50 years, and some estimates as high as 33-40% in the southern Oregon region, and it should be noted that our

knowledge in this potential threat is improving by the day. An inevitable earthquake or tsunami of modest or severe size slated for the region would cause an unprecedented environmental disaster should these projects be developed (including significant oil spills and explosions). The mitigation proposed in the DEIS does not adequately address this outcome and its destructive effects as these are un-mitigatable impacts. "Making land-use development decisions based on the Ordinary High Water Mark (OHWM)—which can be approximated by the vegetation line—without the context of seasonal fluctuations, event-induced erosion, and decadal-scale trends may lead to decisions that challenge community resilience." George Kaminsky, Washington Department of Ecology, personal communication Nov. 17th, 2015. It is predicted that subsidence of 1-2 meters will occur in liquefaction areas along the coast following a major Cascadia subduction earthquake. Developing in this area and the impacts from a spill will greatly impair the community's ability to recover from a major natural disaster.

Response O51-4

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards* describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment O51-5

These proposals promote the extraction, transport, and burning of fossil fuels, all of which are contributing to climate change and a host of related hazards, costs, and threats to every community, coastline and economy in the world, including our own. The Surfrider Foundation has recognized climate change is a scientific reality that will include changes in the characteristics of the ocean including warmer waters, more acidic oceans, increased sea level rise and storm severity that threaten coastal communities and the health of beaches, and coastal and ocean ecosystems. We are actively working throughout Washington, and in Grays Harbor County to promote adaption and improve community resiliency in the face of these unprecedented changes, approving these project proposals is moving in the opposite direction of enhanced resiliency and is significantly adding to the problem.

Surfrider Foundation finds that siting oil terminal facilities in the coastal zone is not consistent with successful protection, conservation and access to coastal resources. Our significant concerns that are outlined above lead us to conclude that we strongly support the no-action alternative. Additionally, the unknown environmental impacts of coastal oil terminal development and operation present significant risks to the marine environment that are difficult, if not impossible, to adequately address through adaptive management protocols under existing regulatory authorities.

Sincerely,

Gus Gates
Washington Policy Manager, Surfrider Foundation

Brice Boland
Washington Field Manager, Surfrider Foundation

Casey Dennehy
Washington Coast Program Manager, Surfrider Foundation

Kendall Farley
Capitol Chapter Chair, Surfrider Foundation

Tip Wonhoff
South Sound Chapter Chair, Surfrider Foundation

Todd Penke
Seattle Chapter Chair, Surfrider Foundation

Eleanor Hines
Northwest Straits Chapter, Surfrider Foundation

Shawn Canepa
Olympic Peninsula Chapter, Surfrider Foundation

Response O51-5

Comment acknowledged.

O52, Tahoma Audubon Society, Brice Hoeft

Comment O52-1

Tahoma Audubon Society

November 30th, 2015

2917 Morrison Road, W.
University Place Wa. 98466
(253) 565 9278
www.TahomaAudubon.org

final comments, submitted electronically

Westway and Imperium Projects EISs
Attn: Diane Butorac, Brian Shay
c/o ICF International
710 Second Avenue, Suite 550
Seattle, Washington 98104

Tahoma Audubon Society review of the draft environmental impact statements prepared for the Westway and Imperium oil terminal proposals in Hoquiam, WA:

First of all, Tahoma Audubon believes that the proposed terminals are a bad idea. Constructing an oil transport facility in a large and productive estuary is foolish. Routine small oil spills most certainly will occur, and the enclosed geography of Grays Harbor, the lack of wave action, and the huge expanse of mudflats, would ensure that the oil and its effect on the marine habitat would remain for years. Should a large spill occur, the decades-long impact would be catastrophic to the plants and animals in the estuary, the birds that rely on healthy mudflats during migration, and the human fishing community that makes a living in the estuary. Furthermore, constructing crude oil holding

tanks on unstable gravel in an earthquake and tsunami-prone area is injudicious. Sending hundreds of tankers and barges loaded with crude over a hazardous bar every year is foolish. And running trains, which have a recent history of derailment and explosion, down a 100-year-old spur line that follows a river flowing into the estuary is a poor choice for Grays Harbor.

The alleged benefits do not come close to countering the real risks.

We have largely reviewed descriptions and analysis in the Westway proposal alone, as our overall concern relates to using the estuary for large-scale crude oil transport, which apply to both projects. We will reference page numbers (which have dashes) for quotes and discussion of our concerns, as well as chapter and section numbers (lacking dashes).

Response O52-1

Comment acknowledged.

Comment O52-2

chapter 3.1: earth

3.1-6&7: We find it curious that landslide potential for slopes adjacent to the PS&P rail line are identified, but no mitigation measures are recommended.

Response O52-2

As stated in Draft EIS Chapter 3, Section 3.1.5.2, *Proposed Action, Rail*, the potential for landslides along the rail line would be the same under the proposed action as the no-action alternative; however, increased rail traffic related to the proposed action would slightly increase the likelihood of a landslide affecting a train along the PS&P rail line. Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*, presents the analysis of risk of oil spills, fires, and explosions along the PS&P rail line under the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures.

Comment O52-3

3.1-11: The proposed tank farm will be constructed on gravel and sand deposits barely above sea level. At capacity, Westway may hold some 42 million gallons of crude oil. Imperium would hold another 48.2 million gallons. As the draft EIS notes, Hoquiam is an earthquake-prone area, which has experienced tsunamis in the past several hundred years. On page 3.1-13, the EIS characterizes the tank farm site as "having a high liquefaction hazard… susceptible to liquefaction in a strong (6.0 or greater) earthquake"

Your analysis projects a 30-40% likelihood of a 6.0 magnitude local quake in a 50-year period. How long would the oil port be operating? Nowhere do we see a projection concerning the lifespan of these facilities. A 20-year analysis period is referenced, but oil transport could easily exceed that timespan. Oil shipment out of Anacortes has been ongoing since 1911. If the risk of a catastrophic earthquake or tsunami is calibrated in the number of years for an event to occur, then you have to know the lifespan of the facility to assess the risk. We do not see this comparison in your analysis. Its omission undermines the value of the EIS in projecting likely impacts.

Response O52-3

As noted in Final EIS Chapter 3, Section 3.0, *Introduction*, the EIS analyzes the impacts that could occur over the lifetime of the proposed facilities. Potential impacts were quantitatively evaluated in 2017—the anticipated first year of operation—and 2037 to account for future growth and development. This approach provides context to decision-makers about how the impacts of operations would evolve over a reasonably foreseeable period. This is particularly relevant for transportation- and risk-related impacts that can evolve over time because of reasonably foreseeable increased growth, planned infrastructure changes, and phased regulatory requirements for improved transportation efficiency and safety. The EIS does not estimate the potential life of the facility. The 50-year timeframe for earthquake probabilities in the study area presented in Table 3.1-2, in Draft EIS Chapter 3, Section 3.1, *Earth*, is a function of the tool presented for public use by the U.S. Geological Survey; however, these estimates can translated to longer time periods (e.g., the probability over 100 years would be double the estimate presented.

Comment O52-4

The EIS notes that the Cascade Subduction Zone fault, a significant and active geological feature, is located about a hundred miles offshore. The proposed tank farm is essentially at sea level. Examination of the map on page 3.1-15 demonstrates that the proposed facilities would be completely vulnerable to even a small tsunami.

Response O52-4

The Draft EIS considers the impacts related to a large earthquake and related effects such as tsunamis, and smaller events are considered by inclusion in the consideration of the larger and more intense seismic event. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment O52-5

3.1-16: The EIS projects that at the proposed tank farm site the chance that a 21-26-foot high tsunami "would not occur would be 97.7% in any given year." Meaning the likelihood of the event happening in a given year would be 2.3%, or a 46% chance over 20 years. We do not see how this constitutes a "low risk".

Response O52-5

Final EIS Chapter 3, Section 3.1, *Earth*, has been revised to correct a calculation error in the Draft EIS. The risk equates to a 0.03% likelihood of a tsunami in any year, and a 99.97% chance of it not happening.

Comment O52-6

We suspect that that you made a subtraction error on 3.1-16, since you assert that a 0.03% likelihood equates to a 97.7% chance that the tsunami would not happen. Simple mistake, if that's the case. None-the-less, the error calls into question the reliability of your mathematical analysis, and why the "low risk" interpretation was made despite the identified high risk of the event occurring. It seems that "low risk" is your default assessment.

Response O52-6

Final EIS Chapter 3, Section 3.1, *Earth*, has been revised to correct the subtraction error.

Comment O52-7

We do not see other locations for the tank farm presented as an alternative. Of course the EIS only addresses the existing application, which is for construction and operation on Port property adjacent to the water. But if the applicants are serious about building and operating safe transport facilities, they should be prepared to site the plant on solid ground, in the event of an earthquake, and at some elevation, in the event of a tsunami. The fact that they have chosen the convenient rather than the safe locations for their proposed terminals should be grounds for denial of the permit.

Response O52-7

Refer to the Master Response for Project Objective and Alternatives for an explanation of the alternatives evaluated in the Draft EIS.

Comment O52-8

Because of its explosive potential and toxicity, as well as its capacity to degrade the environment for decades, permitting agencies should not allow major transport of crude oil facilities to be constructed on loose soils at sea level in an earthquake and tsunami-prone area.

Response O52-8

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment O52-9

3.1-24: "Although the likelihood of a large-scale tsunami event is low, such an event would likely cause unavoidable and significant adverse environmental effects at or near the site if it occurred and the facility was not constructed to withstand it". We believe that suggesting that the "adverse environmental damage" could be avoided if the facility was "constructed to withstand" a tsunami is a gratuitous contention. Massive and robust structural barriers were utterly overrun during the 2011 Tohoku tsunami in Japan.

Response O52-9

Final EIS Chapter 3, Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* clarifies expected post-seismic and post-tsunami performance of the proposed storage tanks. Refer to the Master Response for Seismic Risk and Design Requirements.

Comment O52-10

Page 6-16, on cumulative effects, asserts that the Washington coast, including Grays Harbor, will experience up to a 9-inch sea level rise by 2030, and a 24-inch rise by 21which would make the tank

farm even more vulnerable. This observation is not included in this EIS's assessment of risk in section 3.1, and it should be.

Response O52-10

Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts, Climate Change*, clarifies predictions of sea level change in the study area and potential flooding at the project site. With sea level rise in the study area predicted to be 1.57 feet by 2050, the project site will remain approximately 5 feet higher than the projected high tide. As such, it would not be subject to flooding even during extreme storm events. Chapter 3, Section 3.1, *Earth*, addresses geology, soils, and geologic hazards.

Comment O52-11

3.1-23: "These risks would be similar to, but slightly greater, than under the no-action alternative". A similar assessment is made on page 3.5-23, and in other sections of the documents. This language minimizes hazards, often when discussing a 30-100% increase in rail or vessel traffic. It ignores the fact that there are two proposals (and one pending) for oil transport facilities. Often the cumulative traffic increase would more than double, which is not "slightly". But most importantly, this language does not acknowledge that the damage caused by released oil is many orders of magnitude greater than that of other transported commodities. Spilled grain, which occurred in two PS&P derailments this year, does not pose the same hazard that spilled crude oil does. Which would give you greater concern if it happened in your back yard: a spilled barrel of crude oil, or a spilled barrel of corn?

Response O52-11

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses the impacts associated with construction routine operation of the proposed action. The potential for widespread environmental damage related to the risk of oil spills, fires, and explosions is addressed in Chapter 4, *Environmental Health and Safety*.

Comment O52-12

chapter 3.5: animals

3.5-8: Thank you for your recognition that "migrating shorebirds . . . stop to rest and feed during their annual spring migrations". But migrations happen twice a year. Healthy mudflats during the fall migration are every bit as important as access to food in the spring.

Response O52-12

Draft EIS Chapter 3, Section 3.5, *Animals*, acknowledges that bird migrations occur during various times of the year. Section 3.5 addresses impacts on all animals, including birds, assuming the species would be present during the construction and operation of the proposed action (independent of the time of year).

Comment O52-13

3.5-9: We appreciate that the DEIS recognizes that the Grays Harbor Estuary is one of international hemispheric significance, as designated by the Western Hemisphere Shorebird Reserve Network. Our overall concern is that oil transport will degrade the health of estuarine habitat, which in turn

will threaten the survival of the migratory birds that rely on that habitat. Let's be clear: if the shorebirds are unable to rest and feed, they likely will die. Given the huge number of birds that rely on the estuary, entire populations would be severely impacted.

Declining numbers of shorebirds in Grays Harbor during the past several decades reveal that many of these populations are threatened. Streaked horned lark, marbled murrelet, and western snowy plover are listed as "threatened" by the US Fish and Wildlife Service. They all use the estuary. Certain populations of migratory birds show pronounced fidelity for the Grays Harbor mudflats during migration. More than half the known western population of a sandpiper called the red knot stops exclusively in Grays Harbor on their migration from Baja California to their breeding grounds in the Arctic. An oil spill impacting their feeding grounds would clearly decimate their population, and threaten its survival.

Response O52-13

Comment acknowledged.

Comment O52-14

3.5-17&18, 3.1-17: The following statement is used several times to describe the "no-action alternative", what happens if the permits are denied: "Although the proposed action would not occur, it is assumed that increased growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in impacts similar to those described for the proposed action,"

We find the statement to display ignorance of the unique impact of oil spills, and to be extremely prejudicial. The destructive potential of fugitive oil, whether from routine transshipment operations, or by a large spill, is huge, and well documented. The risk of this impact is trivialized by assuming that an imaginary comparable threat will emerge if the oil ports are not approved. No documentation is provided concerning this imaginary threat, and yet it is posited as real. The statement is disingenuous, and used frequently.

Response O52-14

Refer to the Master Response for Baseline and No-Action Alternative.

Comment O52-15

3.5-21: Though it is gratifying to Audubon that "the applicant has also committed to cease all vessel-loading operations for a 2-week period each year during the Grays Harbor Shorebird Festival," the offer is gratuitous. Thank you, but if a serious spill happened inside the estuary three weeks prior to spring migration, the oil distributed throughout Grays Harbor would still kill shorebirds. The same would be true if a spill occurred three months before spring migration, or three months before fall migration. Spilled oil doesn't readily go away, and to pretend otherwise suggests that the applicants don't take the threat of their proposed activities seriously. If you include this offer as a meaningful mitigation, your inclusion undermines the integrity of your EISs.

Response O52-15

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification.

Comment O52-16

3.5-23: The document relates that operation of Westway would increase traffic across the estuary by a maximum of 238 vessels per year, in addition to the current 436 large commercial vessels per year. The maximum oil transport traffic would constitute a 55% increase, and yet you conclude that the "impacts would be similar to but somewhat greater compared with the no-action alternative." We are perplexed by your conclusion that a 55% increase is "similar" to no increase, especially since the likelihood of a collision event would increase exponentially as the number of vessel trips increases. And that increase would be even greater if the 400 additional vessels from the Imperium operations are included. The cumulative 638 vessels constitute a 146% increase in traffic, hardly "somewhat greater". Your conclusion lacks merit.

This same language is used regarding vessel traffic on page 3.4-16, and is not substantiated there either.

Response O52-16

The EIS text cited by the commenter appears in Draft EIS Chapter 3, Sections 3.4, *Plants*, and 3.5, *Animals*. Chapter 3, *Affected Environment, Impacts, and Mitigation*, presents the analysis of impacts that could occur as a result of construction and routine operations of the proposed action. Specifically, the impact conclusions are relevant to the resources addressed in Sections 3.4 and 3.5. Section 3.17, *Vessel Traffic*, presents an analysis of channel and berth capacity under the no-action alternative and proposed action. Chapter 4, Section 4.6, *Environmental Health Risks—Vessel Transport,* presents an analysis of potential impacts from increased risk of vessel collisions, groundings, and allisions and related consequences (e.g., release of crude oil) under the proposed action, and proposes mitigation measures to reduce the likelihood of a vessel incident. Draft EIS Chapter 6, *Cumulative Impacts*, considers impacts from increased vessel trips related to the cumulative projects (the proposed action, the REG [formerly Imperium Terminal Services] Expansion Project, and Grays Harbor Rail Terminal Project).

Comment O52-17

chapter 4.4: environmental health risks—terminal

4.4.5: We are pleased to see that the EIS identifies liability for cleanup and damage when an oil spill or explosion happens. However, in recent oil train explosions, the government ended up paying for remediation when the responsible parties filed for bankruptcy. The EIS should address this contingency as well.

Response O52-17

Refer to the Master Response for Liability and Responsibility for Incidents.

Comment O52-18

chapter 4.5: environmental health risks—rail

Our greatest concern with the proposed crude oil traffic on the PS&P line is the likelihood that a derailment could introduce oil into the Chehalis River, whose flow would deliver that oil to Grays Harbor. The riparian habitat along the river, and the productive eelgrass beds in the estuary would be severely damaged. The health and survival of the wildlife that utilize those habitats would be jeopardized.

Response O52-18

Comment acknowledged.

Comment O52-19

4.5-3: Your list of recent crude oil derailments involving explosions is incomplete. You should include six additional incidents: Plaster Rock, New Brunswick; Timmins, Ontario; Mt. Carbon West Virginia; Galena, Illinois; Gogama, Ontario; and Heimdal, North Dakota.

Response O52-19

The list of events, including those mentioned in the comment, have occurred in the extended study area and are provided in Chapter 4, Section 4.7.2.1, *Recent Fires Involving Crude Oil Trains,* to provide information about the types of impacts that can occur as the result of train incidents. This section of the Final EIS has been updated to include the most recent event that occur in June 2016 in the Columbia River Gorge and additional events that have occurred over the past 10 years as identified by the National Transportation Safety Board.

Comment O52-20

4.5-4: "Because of the increased number of rail trips to and from the project site, the proposed action would result in the potential for more frequent spills of bulk liquids relative to the no-action alternative, although the orders of magnitude are very similar. The likelihood of very large releases would remain low."

Approval of both Westway and Imperium would result in nearly doubling PS&P train traffic. Since there were four derailments along the line in 2014, one might assume that there could be an equivalent number of oil train derailments. The consequence, however, could be far more severe, as ten crude oil train derailments in North America over the past several years have resulted in massive explosions.

Further, we question the usefulness of using "orders of magnitude" as the standard when you are comparing measured events. "Orders of magnitude" means increasing values by a factor of ten. Yes, a doubling of train traffic is closer to the original number than is ten times, but it's still twice as much. By referencing orders of magnitude rather than a straight comparison, the EIS trivializes the

risk, for no reason. This reference, which minimizes the appearance of risk, occurs frequently throughout the EIS, and undermines its value.

Response O52-20

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment O52-21

4.5-5&6: The likelihood of various-sized derailments and spills is quantified as number of years before an event is likely to occur. You fail, however, to assess the cumulative chance that any one of these accidents will happen. Taking the less conservative "with rail car improvements" estimation, and doing basic probability analysis, the likelihood is that one of these various releases will occur every 28 years. Four of the last five North American oil train derailments and explosions in 2015 have involved the allegedly safer "improved" rail cars. We question whether or not they afford any reduction in risk. Using the more conservation values you present, for the cars currently used for most oil-by-rail traffic, the chance of one of the spill scenarios presented is once every 24 years. This likelihood should be included in your assessment of risk. It is not a "low" risk, especially when the lifespan of the proposed terminals has not been identified.

Response O52-21

Draft EIS Chapter 6, *Cumulative Impacts*, includes the discussion of cumulative risks in the study area and extended study area.

Comment O52-22

4.5-6: Your conclusion that "the risk of very large releases… would remain relatively low" trivializes the very real damage that would occur if a less than "very large" spill happens. Especially if that spill released oil into the Chehalis. If you're going to highlight your estimation of low risk for large spills, then in order to remain unbiased, you should include the relatively high risk for small spills.

Response O52-22

The Final EIS has been revised to clarify the potential for significant impacts related to small to medium spills.

Comment O52-23

4.5-8-16: We believe that the proposed mitigations regarding rail safety are utterly inadequate. You propose measures such as a safety drill once every two years, a foam truck donated to the Elma fire department, two trailers of fire equipment along the 59-mile rail line, a suggestion that "Ecology should urge the legislature to amend current laws" and "seek funding for a grant to supply firefighting equipment and oil spill response equipment to local responders". These mitigations, though laudable, are plainly inadequate, and ignore the destructive reality of oil explosions.

Response O52-23

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment O52-24

chapter 4.6: environmental health risks—vessels

4.6-6: Your "Vessel Contingency Plant" for oil spills recommends "Remove and dispose of the oil properly". That's easily said, hard to make happen, as anyone who's tried to contain oil spills on water can tell you.

We are pleased that there is a "Geographic Response Plan", but where's the equipment and personnel required to implement the plan? We do not see the location of the equipment identified in the EIS. Perhaps we missed it. If not, this would constitute a serious omission. To have a chance of being even marginally effective, the spill cleanup gear would have to be in vessels stationed on the water, and the personnel would have to have immediate access. If the equipment and personnel would be located out-of-county, then the likelihood of being able to effectively address a spill would be negligible, and should be so identified in the EISs.

Response O52-24

Final EIS Chapter 4, Section 4.2, *Applicable Regulations*, contains additional information about existing capabilities, including the availability of response equipment inventoried through the Western Region Response List.

Comment O52-25

4.6-9: Figure 4.6-3 identifies that a vessel collision producing a 105,000-gallon oil spill has a roughly 70% likelihood, and that a fire or explosion involving that amount of oil has a 50% chance of occurring. This analysis leads us to question how the DEIS can conclude on page 4.6-13 that "the likelihood of a large spill or related explosion is low"

Figure 4.6-3 also concludes that the environmental impact of either scenario would be severe. We concur.

Response O52-25

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed in the Final EIS. As noted in Chapter 4, depending on the location, amount spilled, type of

crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion.

Comment O52-26

Appendix M—Risk Assessment 5-6 presents the data in a different mode: "the chance of a collision with a very significant release is roughly" once in 45 years for both Westway and Imperium together, while the chance of an allision is once in 116 years, and for a grounding, once in 128 years. These events would release an estimated 105,000 to 15.1 million gallons of crude oil. The cumulative likelihood for any one of these spills (a collision or an allision or a grounding) from both ports would be once every 26 years. Do the math. Again, your conclusion that these values constitute a "low" risk for a catastrophic spill is an inaccurate estimation. 105,000 to 15.1 million gallons spilled once every 26 years is hardly a low incidence of catastrophe.

Response O52-26

As discussed in the Master Response for Environmental Health and Safety and based on the risk assessment in Draft EIS Appendix M, *Risk Assessment Technical Report*, the analysis of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, evaluates the likelihood of different spill sizes associated with terminal (onsite) operations, rail transportation, and vessel transportation separately. The risks across these operations are not combined in the Draft EIS because of differing regulatory and design requirements described in Chapter 4, because the cause of an incident involving the facility or rail or vessel transport would likely be different, and because the proposed facility, rail line, and vessel transport corridor are physically separated.

Comment O52-27

4.6-11-13: We appreciate the many steps elaborated in the loading and transport protocols. Attention to these steps over the years has no doubt helped to keep fugitive oil out of the environment. But the barge Nestucca was following the "best-management practices" for its time in 1988, fouling the beaches of Westport and Ocean Shores, killing or injuring an estimated 56,000 birds. Accidents will continue to happen.

Response O52-27

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident.

Comment O52-28

We believe that there is abundant evidence that cleanup operations after oil spills are largely ineffective, and that the EISs' analysis does not reflect this reality. Thank you for including cleanup

protocols, but you neglect to evaluate their effectiveness. The failure to do so makes your assessments of oil spill risk of little value.

Response O52-28

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. The Final EIS reflects revisions to clarify the potential mechanisms for significant unavoidable adverse impacts as the result of increased risk of oil spills, fires, and explosions.

Comment O52-29

4.6-13: The statement "no mitigation measures would completely eliminate . . . " is gratuitous. Obviously no industrial operation is without risk. And of course mitigations can't totally eliminate risk. But the question you should address is whether or not the mitigation can reasonably be expected to protect against the damaging outcome. Your own analysis in figure 4.6-3 says that the mitigations, at best, would possibly eliminate the hazard.

Response O52-29

Comment acknowledged.

Comment O52-30

Remove the term "completely", please, both here and wherever it is used in this context in your documents (4.5.4, 4.6.4, 6.5.3.4, 6.5.5.4, 6.5.7.5). Its inclusion diminishes the value of the EISs.

Response O52-30

The Final EIS clarifies the potential for significant and unavoidable impacts.

Comment O52-31

4.6-13: We note that a "large oil spill or explosion would likely cause unavoidable and significant adverse environmental impacts", and that mitigations would not "eliminate the adverse consequences of a large spill or explosion". We concur.

Response O52-31

Comment acknowledged.

Comment O52-32

6.5.1.4 (as well as 3.4.8, 3.5.8, 3.15.8, 3.17.8, 6.5.4.4, 6.5.6.4): Many sections of the EIS conclude with language to the effect that "compliance with the applicable regulations along with implementation of

the mitigation measures described above would reduce impacts. There would be no unavoidable and significant adverse impacts." A list of routine steps that can be taken (study, train, establish a schedule, collaborate, maximize, minimize, have a workshop, evaluate, reference, describe) does not ensure that serious risks are adequately addressed, especially with no enforcement regime to ensure that those steps are taken. Listing what measures could be done does not assure that "there will be no unavoidable and significant adverse impacts". The assertion is without substantiation.

In conclusion, we appreciate that a huge amount of work has gone into these EISs. Thank you. We believe, however, that many of the conclusions are not backed up by the documentation presented. The often-asserted "low" risk often appears to be subjective, and not supported by the facts presented.

Response O52-32

Refer to the Master Response for Mitigation Framework for an explanation of how mitigation measures were identified in the Draft EIS.

Comment O52-33

Though chapter 7, cost-benefit, addresses economic and social issues with respect to the City of Hoquiam, we do not see adequate assessment of the cost to the Grays Harbor region, and specifically to the natural resources that make the estuary so valuable, and provide so much employment to the entire county. The EIS is deficient if it does not analyze the dramatic ecological and economic impact of oil releases, from the certain routine small ones, to the all-too-likely major spills. You may project that the risk of derailment and spills are low, but the catastrophic consequences would be huge. The benefit of the proposed ports to the fishing and recreational (including bird-watchers) industries is zero. The benefit to the natural environment is also zero. The risk to these communities is huge. These factors should be addressed in detail in your EISs.

Response O52-33

The approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O52-34

Finally, the draft EIS does not recognize that oil released into the environment is entirely different from spills of other less invasive, toxic, and pervasive materials. The document frequently asserts that rail and vessel transport of other commercial commodities is the equivalent of the traffic of

crude oil. It posits that unspecified future industrial activities would pose as much risk as would industrial transport of oil. It asserts that the threat of oil release is low, without substantiation. We believe this unwillingness to recognize the likelihood of spills, and the unique threat that oil poses to the environment calls into question the value of the EISs' conclusions.

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Response O52-34

Draft EIS Chapter 4, Environmental Health and Safety, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. The detailed methods and assumptions used in the risk assessment are described in Draft EIS Appendix M, *Risk Assessment Technical Report*. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment O52-35

additional comment by Joseph E. Tieger:

Fiscal Risk

Section 3.3 Laws and Regulations for Water and in other sections there are references to the Oil Pollution Act of 1990 (33U.S.C.A. §§ 2701-2761)(OPA). As noted the OPA requires that that the owner or operator of a vessel or facility establish, subject to certain limitations, evidence of financial responsibility so that funds will be available to respond to a release of oil.

One might ask why a reasonable person would propose to build and operate a facility storing 42 million, or 48 million, gallons of oil on a site subject to seismic soil liquefaction and/or a tsunami if they would be liable for the costs of any response action, the restoration of natural resources, and claims for damages from private parties.

The answer to this question can be found in the Oil Pollution Act at 33U.S.C. Section 2703

Defenses to Liability

(A) Complete defenses

A responsible party is not liable for removal costs or damages under section 2702 of this title if the responsible party establishes, by a preponderance of the evidence, that the discharge or substantial threat of a discharge of oil and the resulting damages or removal costs were caused solely by—

(1) an act of God;

Therefore the "person" owning or operating a facility that is the source of a catastrophic release caused by a seismic event or a tsunami that, even if the catastrophic release was predictable it is still "an act of god."

Private parties injured by the release would have no course of action of action under federal law, and possibly state law, for the recovery of damages.

Some measure of the extent of this liability can be found in the costs for these costs could be derived from the costs of the releases at the Kalamazoo River (approximately 793,000 gallons, or the Deepwater Horizon (4.9 million barrels).

If the agencies permitting the construction and operation of these facilities decide that the projects should proceed they will have essentially made the public the "liable party" for the response costs and the restoration of natural resources. It is not the project proponent that bears the fiscal risk of a catastrophic event, it is the public.

Response O52-35

Refer to the Master Response for Seismic Risk and Design Requirements.

Comment O52-36

Environmental Risk

The EIS goes to great lengths to describe the "mitigation measures" such as training and positioning oil recovery equipment at and near the facilities.

However, as noted in the EIS—

"Average current velocity is about 1.9 knots on the flood and 2.8 knots on the ebb but velocities have been known to reach 5 knots. The direction of the current near the bar can be erratic, running north close inshore and south offshore. In the harbor, current velocities in the navigation channels seldom exceed 3 knots. The tidal cycle in Grays Harbor is mixed semidiurnal (two high tides and two low tides in a 24-hour period with varied heights), which means that tidal height relative to mean low water ranges from less than 1 foot to almost 9 feet twice a day"

This describes the water movement under ordinary conditions. The fact of the matter is that, under the conditions described for Grays Harbor, a significant portion of a large volume of oil spilled into the Harbor will neither be contained, nor recovered.

The Oil Spill modeling assumes that a significant portion of the spilled product will evaporate (which is questionable given winter water temperatures) or emulsify.

Grays Harbor, like all estuaries, receives considerable quantities of silt and suspended organic material from the inflowing rivers. In addition, as Grays Harbor is shallow, wind and tidal action re-suspend previously deposited sediment. Oil will attach to these particles creating an "oil particle aggregate" or OPA [Footnote 1: Oil-Particle Interactions and Submergence from Crude Oil Spills in Marine and Freshwater Environments –Review of the Science and Future Science Needs, Fitzpatrick, Faith A, Michel C. Boufadel et al. Open File Report, US Geological Survey 2015-1076] (hereafter – Report).

"Traditional clean-up methods based on physical recovery of oil slicks on surface waters are ineffective for spilled oil once it submerges." "OPA formation increased with increasing salinity, and at 35 ppt almost all of the oil was taken up in OPA formation." (Report page 8). Normal seawater is 35 ppt.

In an estuary, suspended particles entering with the freshwater interact with the dissolved sodium and chloride ions and begin to aggregate forming a continuum of particle sizes. As noted in the EIS the freshwater being lighter flows over the sea water forming a gradient (a.k.a.-wedge). The suspended particles, including those coated with oil and other contaminants, move both vertically and horizontally with the tides and varying freshwater inflow. As is known by fisherman this mixing zone is an active area for fish and other organisms, large and small. It is also an area where larval fish and invertebrates concentrate to feed on the suspended particulates and where their ingestion and exposure to concentrated contaminants can be injurious.

Depending on inflow, tidal and weather conditions particles suspended in the wedge may remain there for more than one tidal cycle as will any oil entrained. This increases the risk of oil toxicity to the organisms occupying this area.

The OPA also sink to the bottom of the waterway "Recovery techniques for submerged oil and OPAs in freshwater and marine environments still in the development phase." "Where oil is deposited OPAs remains at concentrations that cause concerns for benthic organisms or excessive sheening occurs, dredging may be necessary." (Report page 21) Given the areal extent, varying depths, and other parameters the recovery of large quantities of oil from a release to Grays Harbor is problematic.

Response O52-36

Refer to the Master Response for Oil Spill Modeling Methods for a discussion of the approach, assumptions, and limitations of the oil spill modeling presented in Drat EIS Chapter 4, *Environmental Health and Safety*, and Appendix N, *Oil Spill Modeling*.

Comment O52-37

RISK Assessment

"In general, this risk assessment considers the implementation of the proposed actions over a 20-year analysis period from 2017 (anticipated start of operations) to 2037."

Unless the Project Proponents provide a legally binding assurance that they will cease operations and remediate the site in 20-years a 20-year assessment of the risk posed by this site is absurd. The use and transport of oil has continued since the discovery at Oil Creek Pennsylvania in 1859. It is possible that the use of petroleum will cease within 20-years. Unless the applicants provide a factual basis for this assumption, a longer period of 100-years for the risk assessment would be more realistic.

The EIS states:

"Catastrophic failure of a storage tank is quite unlikely, with a release predicted once in 40,000 or 22,000 years, for Westway and Imperium, respectively."

However: the EIS also states that:

"At the project site, a magnitude 6.0 earthquake has a 30 to 40% likelihood of occurring once in 50 years. An earthquake of magnitude 9.0 or greater has a lower likelihood of occurring, 6 to 8% chance within a 50-year window."

And,

"The 2014 USGS map shows that, for the study area, there is a 2% probability of an earthquake exceeding a PGA of 0.7 g in a 50-year period. As a generalization, this means that in any 50-year period, there is a 2% chance that an earthquake could occur that would result in severe shaking and moderate to heavy structural damage. Ground shaking would be strongest in areas underlain by soft soils or unconsolidated deposits such as sand and silt and least in areas underlain by solid rock. The Site Class Map of Grays Harbor County, Washington characterizes the project site as Site Class E, which is the highest level of expected increase of ground shaking due to the type of underlying materials (Palmer et al. 2004). Similar areas of soft soils also occur along the PS&P rail line and would be susceptible to ground shaking in the event of a magnitude 6.0 earthquake or higher."

And further that:

The loss of support for overlying layers may result in these overlying layers subsiding or moving laterally (lateral spreading). Liquefaction also contributes to the loss of bearing capacity for shallow foundations. Subsidence or lateral spreading can damage building foundations or lead to building collapse.

"During a CSZ earthquake, coseismic subsidence would occur almost instantaneously and the land in the study area would drop 5 feet or more. Substantial geologic evidence exists of these events in the Grays Harbor vicinity and in Grays Harbor specifically (Atwater 1992; Shennan et al. 1996; Atwater and Hemphill-Haley 1997; Wang et al. 2013). As noted above, the most recent CSZ earthquake and associated coseismic subsidence occurred January 26, 1700 (Atwater et al. 1995; Jacoby et al. 1997; Atwater et al. 2005). Wang et al. (2013) review CSZ earthquake subsidence analyses from a wide variety of CSZ sites from northern California to British Columbia. Based on two sites in the Grays Harbor area that they consider to provide the best basis for determining the amount of local coseismic subsidence from the event, Wang et al. (2013) approximate coseismic subsidence of approximately 2 to 5 feet."

It was found that the berm surrounding the Westway Terminals LLC and Imperium Terminal Services will be overtopped.

Given that the probability of a seismic event severe enough to cause liquefaction is 30-40% every fifty years how is it possible that:

Catastrophic failure of a storage tank is quite unlikely, with a release predicted once in 40,000 or 22,000 years, for Westway and Imperium, respectively?

What is the probability of a magnitude 6.0 earthquake which has a 30 to 40% likelihood of occurring once in 50 years. Or "An earthquake of magnitude 9.0 or greater has a lower likelihood of occurring, 6 to 8% chance within a 50-year window" occurring in a 40,000 year or 22,000-year period?

The risks posed by the proposed oil terminals need to be restated. What must be understood is that seismic events and tsunamis are not probabilities, but certainties. It is not a question of "if" these events will occur, it is only a matter of when. The physical, fiscal, and environmental risks to the public posed by these proposals are enormous.

It is clear is that the information presented in the DEIS does not present those responsible for authorizing the construction of these facilities, or the public, with a reasonably complete presentation of, nor concise analysis of, the fiscal and environmental risks posed by the proposed projects.

Joseph E. Tieger
Conservation Committee

Response O52-37

As noted in Final EIS Chapter 3, Section 3.0, *Introduction*, the EIS analyzes the impacts that could occur over the lifetime of the proposed facilities. Where evaluated quantitatively, potential impacts were considered for 2017—the anticipated first year of operation—and 2037 to account for future growth and development. This approach provides context to decision-makers about how the impacts of operations would evolve over a reasonably foreseeable period. This is particularly relevant for transportation- and risk-related impacts that can evolve over time because of reasonably foreseeable increased growth, planned infrastructure changes, and phased regulatory requirements for improved transportation efficiency and safety.

Draft EIS Chapter 4, Section 4.4, *Environmental Health Risks—Terminal (Onsite*), describes the risk and potential for storage failure. Appendix M, *Risk Assessment Technical Report*, describes the data sources for the assumptions used to conduct the risk assessment for storage tank failure. As noted in Appendix M and in the Master Response for Risk Assessment Methods, the risk assessment addresses any single causal event but considers the risks of selected release scenarios regardless of the causal event. The tank failure rate developed for the analysis is based on studies that analyzed historical data of previous storage tank releases caused by a variety of different factors including weather-related factors.

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

The likelihood that a seismic event would occur is unchanged as the result of the proposed action; however, as noted in Section 3.1, *Earth*, there is the potential for increased risk of harm to property and people as the result of the proposed action. The increased potential for exposure to crude oil is addressed in Section 4.4. As discussed in Section 4.7, *Impacts on Resources*, depending on the specific circumstances of an incident, the potential environmental impacts could vary but do have the potential to be significant.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

O53, The Lands Council, Laura Ackerman

Comment O53-1

The Lands Council is a conservation group representing more than 1200 members in the Inland Northwest. Our offices are 500 feet from the BNSF line in downtown Spokane. We are greatly concerned about Imperium and Westway expansions because the scope of the facilities reaches well into eastern Washington and beyond. The facilities will clearly negatively impact the cities of Cheney, Spokane, and the Spokane Valley because these communities will experience higher volumes of train traffic on their way to Gray's Harbor. The Co-lead agencies must increase their scope of study to include Spokane County and the many other towns along the rail line. It is imperative that DOE and others consider the transportation system of oil in its totality. Westway and Imperium could NOT exist without a rail link to the oil fields. Because of that, excluding the rail towns shows a very careless attitude about the lives, homes, schools, businesses, hospitals, rivers, and so forth, all of which would suffer dearly from an oil spill and/or fire. Spokane and neighboring towns get ALL the rail traffic for existing refineries, facilities, as well as proposed ones. That needs to be included in each and every DEIS related to oil traffic.

Response O53-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

Comment O53-2

In addition all that rail traffic greatly increases our exposure to air pollution emitted from locomotives. Please read this study: Air pollution linked to slower cognitive development in children Date: March 3, 2015 Source: PLOS Summary: Attendance at schools exposed to high levels of traffic-related air pollution is linked to slower cognitive development among 7- to 10-year-old children in Barcelona, according to a new study.
http://www.sciencedaily.com/releases/2015/03/150303153217.htm Then please read the other studies listed next to this one about the damaging impacts of diesel PM. The studies continue to add up that diesel PM is dangerous to the health of humans. Humans who live and work within a mile of the tracks often don't have the opportunity to move from where they work, live and go to school. You are uprooting the lives of thousands of people with grave concerns about health and safety with the continued transportion of fossil fuels, and their transportation modes. It is highly unlikely the tracks will be moved. You can't move thousands of persons from their homes, jobs, schools, etc. The situation cannot be mitigated so therefore the permits must be denied. I strongly encourage you, and the CEOs of the companies to visit the rail line towns. Come and understand what we could lose. Rail line towns are a significant factor. This is not just about Gray's Harbor. The lives and the livelihoods of those of us 500 miles away are of no less value, but that is what is implicitly being expressed by excluding a huge geographical area. Thank you for this opportunity to comment.

Response O53-2

Refer to Response to Comment O53-1.

O54, Trails Club of Oregon, P. Sydney Herbert

Comment O54-1

Name P. Sydney Herbert
Organization Conservation Chair, Trails Club of Oregon
City / State / Zip Parkland, OR 97289

The Trails Club of Oregon is a 100 year old hiking and outdoor recreation group with about 400 members, many of whom live in Washington. We are affiliated with the Federation of Western Outdoor Clubs, an umbrella organization of some 50 clubs including Seattle Audobon Society. Trails Club owns a lodge in the Columbia River Gorge National Scenic Area and our members frequently recreate there. We are concerned that the DEIS ignores the regional impact of the proposed projects. This region includes Columbia Gorge NRA. I have attended Gorge commission meetings and can report that all members have major concerns about oil and coal trains. The tracks run right along the river & are subject to slides and derailments. The tracks run through the centers of all the small gorge towns. Their residents and public officials argue that these in an economic benefit for them but plenty of environmental degradation. They are on record asking the governors of Washington and Oregon to oppose the trains and the necessary infrastructure. The Federation of Western Outdoor Clubs resolved in August 2014 at annual meeting to oppose coal and oil trains in the Columbia River Gorge and Puget Sound. Considering the inadequacy of the DEIS and demonstrations, environmental consequences of the proposed actions and the impossibility mitigating actions we respectfully ask that you deny this action. P Sydney Herbert conservation@trailsclub.org 5125 SW Dosch Road Portland, OR 97239-1252

Response O54-1

Comment acknowledged.

O55, Twin Harbors Fish and Wildlife Advocacy

Comment O55-1

Twin Harbors Fish & Wildlife Advocacy PO Box 179 McCleary, WA 9855 thfwa@comcast.net

November 23, 2015 ICF International 710 Second Ave., Suite 550 Seattle, WA 98104 RECEIVED Nov 30 2015

RE: Comments on Westway and Imperium Terminal Services Expansion Projects EISs

The Twin Harbors Fish & Wildlife Advocacy is a non-profit corporation duly registered with the Secretary of State in WA state with a 501 (c) (3) designation by the IRS. The purpose of the Advocacy is assisting the public, business entities and regulatory agencies in managing fish, wildlife, and natural resources for the benefit of the state's citizens and the future generations that will follow all of us. Additional information regarding the Advocacy is available on our website at www.thfwa .org.

Introduction

The Advocacy members have been active in fishery recovery programs and fisheries management in Grays Harbor for 3 decades. Over the last 4 years, the Advocacy members have participated in citizen advisory groups for Grays Harbor by either appointment by the Director of Washington Department of Fish & Wildlife (WDFW), invitation from the Fish & Wildlife Com? mission, or via the public process set forth in the Administrative Procedures Act.

The Advocacy President is a career petroleum industry consultant that has served for decades on technical advisory groups by appointment by the Governor or invitation of the appropriate Director for matters relating to petroleum transportation, storage, and marketing [footnote 1: Hamilton Resume (http://thfwa.orgfboard-of -directors)]. His experience includes assisting the Department of Ecology for rule adoptions related to underground storage tanks, vapor recovery, hazardous substance cleanup standards (MTCA), storm water runoff in Puget Sound, and management of the Policy Liability Insurance Agency.

After review of the DEIS for the two proposed terminals, the Advocacy finds the DEISs are fatally flawed and leave the reader with impression of an extremely lengthy promotional sales brochure rather than a legitimate analysis of the potential environmental risks of the two proposed projects. The following are some examples of the flaws found in each of the DEISs:

- Understatement or misrepresentation of the potential public safety risks;
- Understatement or misrepresentation of the environmental risks;
- Understatement or misrepresentation of the economic impacts;
- Omission or misrepresentation of the potential impacts on fisheries in the region;
- Failure to utilize best available science readily available to the preparers.

While experts and the public can often come from different points of view, expert opinion and research should rise above simple deliver of a message desired by a client when the supposed expertise is incorporated into an environmental impact statement. During its research, the Advocacy read numerous passages from the DEIS to local citizens that live near the train tracks or fish the streams crossed by the tracks including those that support and oppose the proposed projects. Such passages included the expressed references in the DEIS as paraphrased below:

- the chance of a derailment with release into the water was low as once in every 40,000 years
- spill response capability would be reliant upon a trailer of minor equipment located near Oakville and other equipment would need to be brought in from other areas
- accident response would rely upon a foam truck located in Elma and notification to the County Emergency Notification System which would then notify first responders from the different volunteer or staffed fire departments
- the risk to recreational fishing were potential delays in launching a boat from the Port's ramp on 28th street
- the potential for negative economic impact of the two crude oil export terminals was less or similar to the risks from some other use of the locations by the Port.

In every case, the response was a nervous laugh followed by a statement similar to “you've got to be kidding me”. The content of a DEIS on a crude oil terminal should not fall to the level where the normal citizen would consider the document “laughable”.

Response O55-1

Refer to Response to Comment O55-2 regarding public safety risks.

Refer to Response to Comment O55-3 regarding the analysis of environmental health risks.

Refer to Response to Comment O55-4 regarding the analysis of economic impacts.

Refer to Response to Comment O55-5 regarding the analysis of impacts on fisheries.

Refer to Response to Comment O55-6 regarding the basis of the information used in the EIS.

Comment O55-2

Understatement or misrepresentation of the potential public safety risks

The DEIS documents are a classic example of a "house of cards" built on a foundation that first understates the potential for a release from a rail car. The authors calculate that the chance of a similar instance occurring is nearly zero as other oil train wrecks occurred at speeds over 25 miles per hour and the line in question has a speed limit of 25 mph. This rationale ignores the very reason why the limit is in place (location and conditions of the line).

This flawed rationale fails to recognize that crude oil train accidents have occurred regularly on lines maintained in far better conditions than the line into the Port. In reality, speed is not the only equation let alone the most important as recent derailments occurred on the GH line with the cars stopped and parked. As an example, the analysis just released by the Energy Site Evaluation Council predicted a derailment could occur from the oil export terminal in Vancouver, WA every other year [footnote 2: http://www.efsec.wa.gov/Tesoro%20Savage/SEPA%20-%20DEIS/DEIS%20PAGE.shtml]. The level of analysis in the ESEC report is missing from the DEIS.

The analysis used in the DEIS for estimating the risk of a derailment defies logic, common sense, and ignores recent studies of previous accidents that found oil trains were twice as likely to derail than other cargo trains traveling the same tracks [footnote 3: Attachment A, Oil train crashes - Spreadsheets - Los Angeles Times.pdf]. According to researchers in Canada, the problem is likely the movement occurring in the heavy liquid inside each car is applying pressure to tracks that is in excess of normal traffic and causing the tracks, even newly installed tracks, to spread causing track failure [footnote 4: Attachment B, Railway Investigation R15H0021—Transportation Safety Board.pdf] If the line through GH had 4 derailments in 2014, the research at this points finds the number of train derailments could reach up to 8 per year by simple math.

Another flaw comes from the assumed number of trains that will be hauling oil. The terminals are a profit motivated endeavor [footnote 5: http://washingtonports.org/wp-content/uploads/2013/05/Spring 13-ShaleKirkKinnear.pdf]. If market conditions are favorable for profiting from exporting oil, it is appropriate to expect the operators will run the terminal at full capacity. Full capacity does not mean a "low-ball estimate" from the operators that implies a limited amount of volume. The true volume capacity is calculated using the number of trains that can get in or the number of ships that can get out. The DEIS for the terminals are not based on the true capacity of the facilities proposed and as a result, likely underestimate the numbers of oil trains that could travel down the rail line into the Port.

Response O55-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

As noted in the Master Response for Project Objectives and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant. Draft EIS Chapter 2, *Proposed Action and Alternatives*, describes the type of material and approximate volumes to be transported based on this information. The City of Hoquiam will specify maximum throughput in the conditions of a shoreline development permit. In addition, other permit approvals could identify the maximum allowable (permitted) throughput of the facility. Any increase in annual throughput capacity would require revised or new permits and plans.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Comment O55-3

Understatement or misrepresentation of the potential environmental risks

The next story in the house of cards is the diminishment of the environmental risks which rests upon the faulty foundation inserted that there is little if any risk of a release of crude from an oil train. Then, the physical nature of the Chehalis and Grays Harbor's estuary is down played or outright ignored.

The planned spill response capability in GH is not similar to programs found in Puget Sound, San Francisco, the Gulf, and other regions that house refineries and larger volume oil activity. While the volume of the proposed rail export terminals are adequate to pro? vide significant damage, especially in the conditions found in GH, the volume is low by oil industry standards making appropriate investments into spill response unlikely due to the financial commitments required has to be spread across far fewer barrels. This factor is especially important when one realizes the owners of the oil coming down the line and others have limited financial responsibility. The tax imposed on oil coming in by train to provide state funding sources is exempt on oil exported out of the state. Normal business discretion that assesses financial risk to potential profit is effectively negated as the public is required to assume nearly all the risks and costs associated with a cleanup. While potentially liable parties can be pursued after the fact, many responsible parties in this case are not large entities with assets such as Exxon and BP and at the same time, are not required to post proof of financial responsibility.

The rail line follows the Chehalis river which is the state's second longest stream. The rail line crosses numerous streams and tributaries that flow into the Chehalis. During the rainy seasons, the Chehalis floods and stretches across hundreds of thousands of acres of farm land, brush areas, forest land, and wetlands which would make cleanup of a spill extremely expensive and nearly impossible to contain.

As an example, according to its Comprehensive Flood Hazard Management Plan, the reservation of the Chehalis Tribe near Oakville is approximately 5,000 acres of agricultural lands, wetlands, forests, and residential or business properties experiencing regular flooding that will cover up to 3,750 acres in up to 10 feet of water [footnote 6: https://www.chehalistribe.org/departments/planning/resources/Chehalis- Tribe-CFHMP.pdf].

The booms and other equipment proposed to be located on the reservation would not be adequate to handle a spill on the reservation let alone any other stretches of the river downstream that would be effected.

The DEIS acknowledges it would be unlikely to have a release removed from the water. Crude oil on water evaporates lighter fractions and the heavier components sink to the bottom. In the lower end of the river, the banks and bottom out into the bay are mud making clean up practices such as steam cleaning of rock beaches in Prince William Sound, AK, and along the Gulf's sandy beaching impractical. While the volume of oil would not rise to the level of the Valdez incident, the Chehalis and the estuary are relative smaller waters that could see similar effects from a significantly lower volume release.

In addition, the lower stretch of the Chehalis from Montesano out to the bay is subject to tidal surges that can move up and down repeatedly several times each day. The tide surges would move the oil back and forth repeatedly each day through areas critical for juvenile salmon survival [footnote 7: http://wildfishconservancy.orglprojectsllower-chehalis-river-and-surge-plain-fi.sh-use-assessment]. The tidal movement's impact on cleanup is not adequately addressed in the DEIS.

Response O55-3

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

As noted in Chapter 4, oil spill modeling was completed to provide information about the potential movement of spilled oil for a subset of the risk scenarios addressed in the risk assessment based on conditions that could occur within the study area. The consequences associated with any single scenario would vary depending on the conditions present at the time of an incident. For information about how tides are factored in and for a discussion of the limitations of the oil spills, refer to the Master Response for Oil Spill Modeling Methods. Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Comment O55-4

Understatement or misrepresentation of the economic impacts

A spill at the Port itself could find its way up to Montesano in the Chehalis and up into tributaries such as the Satsop, Wynoochee, Wishkah, etc. that receive flow upstream with the rise in the tide. A derailment upstream could result in contamination from the point of entry down past the proposed terminals to the mud flats of the bay. Either can effect sand shrimp, fresh and salt water clams,

insects and other portions of the food chain for birds, and fish of all kinds (including ESA listed Green Sturgeon).

The DEIS attempts to diminish the economic impacts of a release to a small area located along the rail line itself. This flaw is created by ignoring the fact that the salmon juveniles coming out of spawning grounds in the Chehalis and its tributaries all have to travel down to the bay in their preparation to journey out into the Pacific. Then, back again as adults 3-5 years later. The costs of mitigation for a crude release (recovery of salmon runs) can therefore extend up to 100 miles from the point of the spill. The time line of recovery could reach 20 years or more. A relatively small volume of release and especially multiple releases could therefore negatively impact the citizens throughout the basin residing well above the point of entry into the water.

The bay is critical habitat for juveniles spawned in all those areas [footnote 8: http://wildfishconservancy.org/projects/grays-harbor-juvenile-salmon-fish-community-study]. Degradation of the bay by crude oil that adversely impacts juvenile salmon survival holds the potential to economically impact every citizen in the basin from Ocean Shores up to the headwaters in Lewis, Thurston, and Mason Counties. Loss of natural spawning salmon or the degradation of habitat can trigger the Endangered Species Act (ESA).

The DEIS mentions no salmon stocks in the Basin are currently designated as threatened under the ESA. Then, the draft fails to address how releases of crude into the water in the future could result in impacts on salmon that could trigger such an action. A "worst case scenario" is wherein a release or numerous releases could result in ESA designation of a salmon stock in the future causing significant loss of jobs, devaluation of real estate, property use limitations, sewage treatment enhancements and other measures commonly required when fish or wildlife face severe declines in population numbers.

The DEIS recognizes when oil hits the water that the lighter fractions evaporate and the heavier components would sink to the bottom making removal unlikely. During floods, the spread would enter grass, wetlands, brush, etc. that would likely feed oil back and forth as well for extended periods of time. The DEIS does not adequately consider these physical conditions and the flooding in its assessment of environmental risk.

Response O55-4

The approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O55-5

Omission or misrepresentation of the potential impacts on fisheries in the region

The DEIS fails to recognize or even consider the true potential impact on future fisheries that could result from crude oil releases into the waters of Grays Harbor and its tributaries. The drafters seem totally ignorant of the manner in which fishing seasons are set. Further, the document does not accurately portray the current conditions of many salmon stocks found in Grays Harbor and its tributaries.

In order to manage commercial and recreational fishing seasons each year, co-managers WDFW and the QIN utilize a "preseason forecast" of returning adults to the Grays Harbor terminal. The first step of creating the forecast is an assessment of the juvenile population that spawned in local tributaries and survived to journey out into the ocean. The population is then adjusted for "ocean survival" to determine the number that will likely become adults. Then, the harvest seasons are set from AK south to the GH terminal and the expected number of adults captured (prior intercept) are subtracted. The remainder is the forecast for adults entering the terminal itself. Commonly known as the "escapement goal", the number of adults needed to return upstream to spawn is then deducted to create the fish "available for harvest'' that year inside the terminal and seasons are set accordingly.

Unfavorable conditions existing either inside the terminal or outside in the open ocean reduces juvenile survival. Co-managers respond the corresponding reduction in adult population by limiting harvest seasons in an attempt to insure the escapement goal for natural spawning adults is achieved. Continued failure to reach escapement goals can result in a salmon stock decline to the point wherein ESA designation is granted. In Grays Harbor terminal, Chehalis Chinook, Humptulips Coho and Chum basin wide have been plagued by repeated failures to reach escapement goals [footnote 9: http://wdfw.wa.gov/commission/meetings/2014/02/feb0714_14_presentation.pdf].

In 2014, the Fish & Wildlife Commission passed a new salmon management policy for Grays Harbor [footnote 10: http://wdfw.wa.gov/commission/policies/c3621.html]. The new policy contained guidances and harvest season criteria for non-tribal commercial [footnote: 11: http://wdfw.wa.gov/about/regulations/201 5/wsr_l5-19-086.pdf] and recreational fishers [footnote 12: http://wdfw.wa.gov/about/regulations/201 5/wsr_15-17-010.pdf] set by WDFW. In 2015, the WDFW commercial and recreational seasons were set and then substantially cut back due to concerns over the run size of returning Chinook and Coho stocks [footnote 13: http://wdfw.wa.gov/news/oet2.315a/]. The QIN tribal seasons were likewise reduced [footnote 14: Attachment C, QIN Season Closure Notice dated Oct.29, 2015].

The typical first step on the road to BSA designation occurs when a notice of "over harvest" is issued. In2015, NOAA issued just such a notice for fall Chinook in the Chehalis River. The current condition of salmon stocks in Grays Harbor tributaries are causing significant reductions in harvest seasons set by WDFW and the Quinault Indian Nation (QIN).

Continuing to add another floor to its "house of cards", the DEIS simply ignores the restrictions and limitations that could result for fisheries set by WDFW and the QIN inside the terminal in the event crude oil entered the water. Further, a "worse case scenario" is a large spill or numerous smaller ones that would result in salmon stocks coming under BSA protections which could impact fishing seasons far north as AK for a decade or longer.

Response O55-5

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on aquatic resources. Final EIS Section 4.7 clarifies that potential impacts on fish and shellfish survival, closures of fisheries during response to an incident, and closures due to concerns for seafood safety from contaminants would affect tribal and commercial fishing.

Comment O55-6

Failure to utilize best available science readily available to the preparers

The draft DEIS is a very lengthy document with extensive references and cites to other publications. Most are generic in nature, not applicable to Grays Harbor, or outdated. The selection of the particular referenced documentation is particularly disturbing. All the footnotes on this commentary are cites to documents and references that were apparently ignored by the drafters of the DEIS even though the cites are directly related to Grays Harbor, recently published, and readily available to the general public.

The omission of the potential risk to fisheries is a glaring example of ignoring the capability of determining potential risks. When a fish stock declines through overharvest or habitat degradation, it is well known that recovery can take decades. As an example, the Fish & Wildlife Com? mission recently adopted a new policy in nearby Willapa Bay utilizing the best available science to determine the length of time it could take to restore Chinook natural spawners to regularly reach escapement goals. The new policy established management and harvest season parameters to recover the Chinook within 16-21 years [footnote 15: http://wdfw.wa.gov/commission/policies/c3622.html].

The primary tool used to make the calculations was the "All H Analyzer" or "AHA". The AHA is a large Excel computer model developed especially to run scenarios for fisheries management on harvest implications and habitat restoration [footnote 16: Attachment D, All H Analyzer (AHA) User Guide, June 7, 2005 by Mobrand et al.]. Inserting different scenarios for impacts of varying types of crude oil releases on juvenile salmon would allow the AHA to calculate the recovery time under different harvest scenarios. The results would allow an accurate vision of the harvest seasons of the future following the different release scenarios. Any reductions in seasons from a release would be estimated and an accurate economic impact on fisheries would be attained.

Response O55-6

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Final EIS Section 4.7has been revised to clarify the potential impacts on fisheries. Section 4.7 also clarifies that while impacts would depend on the circumstances of the incident, the resources described in Chapter 3 could be affected.

The commenter makes specific reference to the long timeframe to recover salmon populations and the All H Analyzer tool used to make a recovery assessment. This tool was not used in the Draft EIS as it was determined not to be appropriate for the location and scope of the analysis. The assessment referenced by the commenter for Willapa Bay addresses impacts of degraded habitat on populations, impacts of hatchery salmon spawning with wild salmon, and predicted impacts on population genetics and fitness. The timeframe for recovery reported for Willapa Bay does not apply to potential impacts of an oil spill, which is the issue of concern for the proposed action. Recovery would be dependent on containment and removal of spilled oil from the environment, which could be a short- or long-term process. Analysis of impacts using the All H Analyzer tool would be very speculative and not appropriate for this assessment. Section 4.7, *Impacts on Resources*, describes the general types of impacts on resources that would be expected as a result of an oil spill; the section has been revised to acknowledge the potential for more lasting impacts as the result of a spill.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

O56, U.S. Shorebird Conservation Partnership, Brian W. Smith

Comment O56-1

The U.S. Shorebird Conservation Partnership

Building Collaborative Action for Shorebird Conservation

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20 November 2015

City of Hoquiam and the Washington Department of Ecology
Westway and Imperium Expansion Projects EISs
c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

Dear Sir/Madam:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statements (DEISs) for the Westway and Imperium Expansion Projects in Grays Harbor, Washington.

We, the Council of the U.S. Shorebird Conservation Partnership, ask that you reject the Westway and Imperium oil terminal proposals due to the numerous and enormous risks to shorebirds and their habitats in Grays Harbor.

Response O56-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment O56-2

The U.S. Shorebird Conservation Partnership (USSCP) represents a collective of experts, both individuals and organizations, interested in the long-term conservation of the hemisphere's shorebirds. The Council of the USSCP has long been aware of the value of Grays Harbor to migratory shorebirds, and partners there have been actively engaged in shorebird research and conservation projects for many years.

Grays Harbor Estuary provides 94 square miles of open water, saltmarshes, and mudflats that provide critical habitat for hundreds of thousands of shorebirds and is one of the most important stopover sites for shorebirds migrating along the Pacific Coast of North America. In March 1995, the value of Grays Harbor Estuary was recognized by receiving the designation as a Western Hemisphere Shorebird Reserve Network site of Hemispheric Importance, the highest level of recognition and indicating annual use by <500,000 shorebirds.

Besides the sheer numbers of passage shorebirds annually, Grays Harbor Estuary is also important for species that have elevated conservation concern status. Of 24 species recorded in the Grays Harbor Estuary, 50% are considered shorebirds of conservation concern in our most recent analysis (Shorebirds of Conservation Concern in the United States of America - 2015, U.S. Shorebird Conservation Partnership).

Specific habitats located on Damon Point and at Oyhut State Wildlife Recreation Area are designated as critical habitat for the Western Snowy Plover, which is listed as threatened under the U.S> Endangered Species Act. Snowy Plovers forage in the tidal zone and typically nest nearby on the upper beach. Oil spills and habitat loss are recognized as major threats to the plover across its range.

Additionally, recent research by the Washington Department of Fish and Wildlife and its partners demonstrated that a large segment of the Pacific population of the Red Knot uses Grays Harbor as one of the key refueling sites during spring migration from Mexico to breeding grounds in Alaska and Russia. Resulting from the 2015 assessment referenced above, the “Pacific” Red Knot is determined to need “Immediate Management Attention”. The beringiae subspecies of the Marbled Godwit, with a population of about 2,000 individuals, is another shorebird of conservation concern. The godwit breeds in Alaska and migrates through and overwinters at Grays Harbor and adjacent Willapa Bay. Consequently, an oil spill in Grays Harbor, particularly during spring, could adversely affect a sizable proportion of the population of theses shorebird taxa. An oil spill could cause direct mortality of shorebirds in the spill area, compromise the fitness and survival of oiled individuals, and degrade important habitats.

Response O56-2

Draft EIS Chapter 3, Section 3.5, *Animals*, describes animals and habitats in the study area, including birds that could be affected by the construction and operation of the proposed action. Appendix F, *Special-Status Species*, provides a complete list of all special-status species known to occur in the study area counties. Final EIS Appendix F has been revised to include Birds of Conservation Concern, including the marbled godwit. Oil spill impacts on animals, including birds, are addressed in Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*. Sections 4.4, *Environmental Health Risks—Terminal (Onsite*), 4.5, *Environmental Health Risks—Rail*, and 4.6, *Environmental Health Risks—Vessel Transport,* propose many mitigation measures that would be implemented to reduce impacts related to oil spills, in addition to the regulatory compliance. Chapter 4 acknowledges (in multiple sections) that oils spills are not 100% preventable even with the regulatory requirements and proposed mitigation measures that would reduce the risk of an oil spill; Chapter 4 further states that that the potential impacts from an oil spill could be significant. One of the purposes of the Draft EIS is to disclose impact information and the significance of those impacts so the co-lead agencies can make an informed decision.

Comment O56-3

Beyond the value of Grays Harbor Estuary to shorebirds themselves, people enjoy viewing the large aggregations, and the Grays Harbor Shorebird and Nature Festival is held each year to celebrate this migration spectacle.

Response O56-3

Draft EIS Chapter 3, Section 3.10.4.3, *Grays Harbor*, acknowledges the popularity of bird watching as a recreational activity and the many excellent opportunities for birdwatching available in the Grays Harbor estuary. Section 3.10.4.3 describes the Grays Harbor Shorebird Festival that draws thousands of visitors to the area annually to observe and learn about the annual migration of hundreds of thousands of Arctic-bound shorebirds as they rest and feed at the estuary. In recognition of the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time, the applicant has committed to a voluntary measure recognize the. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*.

Comment O56-4

Coastal visitors add $481 million annually to local Washington economies, and more than one-third of them visit Grays Harbor County. The estuary also provides economic value through commercial, tribal, and sport fisheries.

Response O56-4

Comment acknowledged.

Comment O56-5

The Westway and Imperium proposals, two of three proposed oil terminals for Grays Harbor located in Hoquiam, would have the combined capacity to handle 5.5 million gallons of crude oil daily and have a total storage capacity of 72 million gallons, most of it for export to China. The terminals

would be fed by approximately 16 loaded oil train deliveries every week (more than two per day). If both terminals were built, a total of 638 tankers and barges of oil would need to traverse Grays Harbor every year. The twelve-mile Grays Harbor shipping channel is narrow and shallow, subjected to strong currents, and has a limited maneuvering area for ships and tug boats.

Response O56-5

Draft EIS Chapter 2, *Proposed Action and Alternatives*, describes the storage capacity and maximum annual throughput of the proposed action. As described in Chapter 2, the likely destinations of crude oil moving from the project site are refineries in the Puget Sound area and California. Final EIS Chapter 5, *Extended Rail and Vessel Transport*, reflects the addition of an analysis of the crude oil market and the reasoning for the likely refinery destinations for crude oil moving through the proposed facility. Chapter 6, *Cumulative Impacts*, considers impacts related to increased rail and vessel trips related to the cumulative projects (the proposed action, the REG [formerly Imperium Terminal Services] Expansion Project, and Grays Harbor Rail Terminal Project).

Comment O56-6

The findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor demonstrate that the risks of oil spills cannot be fully mitigated and the environmental damage to shorebirds and their marine food resources could be significant. Similar findings exist for waterway contamination, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings.

We ask that you reject the Westway and Imperium oil terminal proposals given the numerous and enormous risks to shorebirds, their habitats, and public trust lands.

Sincerely,

Brian W. Smith, Chair
U.S. Shorebird Conservation Council

Response O56-6

Comment acknowledged.

O57, Washington Dungeness Crab Association, Westport Charter Association, & Coastal Coalition of Fishers, Larry Thevik

Comment O57-1

Officers
Dale Beasley, President
David Hollingsworth, VP
Libie Cain, Secretary
Doug Fricke, Treasure, Coordinator

Directors
Bob Alverson
Bob Kehoe

Mark Cedargreen
Bob Lake
Kent Martin
Scott McMullen
Dick Sheldon
Butch Smith Ray Toste
Louie Hill
Brian Allison
Carl Nish

Organizations
American Albacore Fishermen Association
Bandon Submarine Cable Council
Columbia River Crab Fisherman's Association
Fishing Vessel Owner Association
Grays Harbor Gillnetter's Association
Ilwaco Charter Association
Puget Sound Crab Association
Purse Seine Vessels Owners Association
Salmon For All Washington
Dungeness Crab Fishermen's Association
Washington Trollers Association
Western Fishboat Owners Association
Westport Charterboat Association
Willapa Bay Gillnetter's Association
Willapa-Grays Harbor Oyster Growers Association

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…….Serving the needs of the coastal fishing industry and coastal fishing communities……

November 14, 2015

DEIS Comments for Imperium and Westway

Paula Ehlers: DOE, Diane Butorac DOE, Brian Shay: City of Hoquiam

C/O ICF International

710 Second Ave., Suite 550

Seattle, WA 98104

INTRODUCTION:

My name is Larry Thevik. I have been a commercial fisher for 45 years. I am the vice president of the WDCFA headquartered in Westport. The comments I am submitting represent the position of the Washington Dungeness Crab Fishermen's Association (WDCFA) and members of the Coalition of Coastal Fisheries (CCF) a fifteen member organization of commercial fishing organizations, oyster growers, and charter boat operators. CCF also includes associate members representing seafood processors.

A recent Port of Grays Harbor study states 2,200 jobs and over $220,000,000 annually come from fishing activity in Westport. A 2012 NOAA study on the importance and value of our nation's economy identified 67,000 jobs in Washington State that were based on seafood related activity commercial and recreational in Washington State. The business of seafood generated $8 billion in sales value annually. We must not forget the business of seafood relies on good water quality.

The coastal crab fishery is sustainable and is the most valuable single species fishery on the West Coast. Washington tribal and non-tribal fishers deliver on average $44,000,000 in catch value each year, employ approximately 600 fishers, and contribute an estimated 80 to 150 million dollars in economic benefit to the State and coastal communities. Grays Harbor is a major nursery area for Dungeness crab and is considered an essential habitat for many other species.

Our organization voted to oppose the crude by rail projects and high volume shipping from Port of Grays Harbor terminals. As everyone knows Grays Harbor County needs jobs and these projects held promise of creating more. After further consideration, our members concluded that the benefits from the terminals simply do not measure up to the risks and unintended consequences they will likely bear. The new jobs expected are not that many yet the potential threat to existing jobs dependent on a healthy estuary, and our marine resources is huge.

The amount of oil that will move through southwest Washington from the proposed Grays Harbor and Vancouver terminal sites would equal half of all the oil moved by rail throughout the entire nation in 2014. Arguably half of the derailments, fires, explosions, and spills will happen here. Remember three trains derailed in Grays Harbor County and a fourth derailed in Lewis County last year. Those derailments occurred without the expected increase in rail traffic and extremely heavy weight of unit oil trains.

The Washington Department of Fish and Wildlife has stated: "Grays Harbor is an area particularly sensitive to the adverse effects of oil spills. If there were to be a spill the volume of product considered would likely lead to a catastrophic loss of Habitat. And the potentially affected area could be much larger than just Grays Harbor vicinity." The 11,000,000 gallons of crude oil spilled in Prince William Sound, from the Exxon Valdez, soiled 1,300 miles of Alaska's coast line. The tankers moving through Grays Harbor will haul up to 15,000,000 gallons each. The total amount stored in Grays Harbor at one time in ships, barges, tanks, and trains would be upward of 115,000,000 gallons.

The Grays Harbor ebb tide "plume" commonly extends eight miles into the ocean. The Nestucca oil barge holed off of Grays Harbor in 1988 spilled "only" 231,000 gallons of "heavy fuel oil" yet that oil

killed an estimated 56,000 seabirds, with a surface sheen that stretched from Oregon to the Straights of Juan de Fuca. Another large portion of that spill travelled over a hundred miles undetected under the surface of the Ocean and reappeared to heavily soil beaches on the North end of Vancouver Island about a week after the spill. Had the barge holed in the summer months under different wind, current, and tide events spilled oil would have just as easily ended up in Willapa Bay just twelve miles to the south. Spilled oil in or near Grays Harbor will travel fast and it will travel far.

Grays Harbor has a narrow, shallow, twenty mile channel with limited deep water anchorage and staging area. Tanker and ATB traffic associated with the terminals is expected to increase vessel visits 450% adding 728 annual large exceed non-tanked traffic by six to one. A collision, allision, or grounding in Grays Harbor is MOST likely to involve tanked oil vessel traffic. Increased vessel traffic of the magnitude proposed is likely to increase conflicts with current fishing operations and smaller vessel navigation and likely preempt existing fishing areas.

Many of our members have been directly affected by past oil spills –the Exxon Valdez "crude oil" spill in Alaska, the Nestucca barge "bunker oil" spill off Grays Harbor, the 1999 New Carrisa "bunker oil" spill off Oregon, and the Cosco Buson 2007 "bunker oil" spill in San Francisco Bay are some examples. Those members witnessed first-hand the difficult task of recovery of oil on water and shorelines.

Many of our members have also witnessed the difference between a promise to pay for damages and the reality of payment. Mitigation easily becomes "mythigation". Exxon was still appealing judgments 19 years after the Alaska spill and 25 years after still owed 92million dollars. Evidence of spilled oil and impacts remain today.

The DOE-claims Washington State has the best spill response plans in the country. While that may be the case the plans are still painfully inadequate for a major spill in the fast moving sediment laden waters of Grays Harbor. No matter how high the paper is stacked, oil spill response plans and available near site spill response assets in Grays Harbor are simply not up to the task. Booming is our first defense when a spill occurs. Booming loses effectiveness in strong current and in rough water. Ebb Tide in Grays Harbor regularly exceeds four knots. Fall and winter gales blow strong and often--unless a spill occurs during daylight hours, with no wind, at a slack tide, and in calm water—booming will offer little defense against a spill. Grays Harbor tidal currents in excess of 3.5 knots occurred at least 112 times in 2014. Booming may work well in some places but not in Grays Harbor. A major oil spill in or near Grays Harbor will not be contained. And, if Grays Harbor is targeted for the shipment of Tar Sands oil much of that oil will likely sink rendering booming useless and our estuary destroyed.

According to the International Tanker Owners Pollution Federation Limited (ITOPF) and the Governors Oil Safety Study at sea recovery rarely results in the recovery of more than 10-15% of spilled oil. The majority of spilled oil will simply not be recovered.

Response O57-1

Section 4.4.3, *What mitigation measures would reduce impacts related to terminal operations at the project site?* includes applicant measures to improve response effectiveness in the case of a spill. More specifically, applicant mitigation includes purchasing an equipment and software package to

supplement information on environmental conditions to support oil spill modeling, identify specialized spill response or prevention equipment, and assist with determination of safe and effective conditions for prebooming. Additionally, a licensed engineer would perform an independent engineering analysis and feasibility study to determine the number of days per year it is safe and effective to preboom oil transfers and identify site-specific improvements. If the study identifies no feasible alternative or until the changes are in place, and if prebooming is not feasible, alternative measures would be implemented during oil transfers in addition to those otherwise required by regulation. However, as noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment O57-2

All Grays Harbor terminal sites are located in Tsunami Zones and in DNR designated liquefaction areas. All of the storage tanks are within 70 miles of the Cascadia Subduction zone. Unfortunately we have a 65% chance of a magnitude 6 earthquake during the expected life of the proposed facilities. A Recently released study from Oregon State University cites a 40% chance of a major earthquake along the Cascadia Subduction Zone during the next 50 years. And that earthquake could approach the intensity of the Tohoko quake, (magnitude 9 producing a devastating Tsunami), that devastated Japan in March of 2011.

Response O57-2

Draft EIS Chapter 3, Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards*, describes potential impacts related to earthquakes and earthquake-related effects (e.g., liquefaction, tsunamis) and the existing requirements that would reduce these potential impacts. Section 3.1.7.1, *Applicant Mitigation*, identifies measures that would further reduce these potential impacts. Refer to the Master Response for Seismic Risk and Design Requirements additional information.

Comment O57-3

As the three West Coast Governor's jointly stated last summer "….a sizeable spill anywhere along our shared coast would have a devastating impact on our population, recreation, natural resources, and our ocean and coastal dependent economies".

Hauling trainload after trainload of extremely volatile crude oil through our communities, storing it near a population center, in a Tsunami Zone, on sites subject to liquefaction, shipping it through a highly valued, highly productive, highly sensitive marine resource environment, in fast moving sediment laden water, and then over the "second worst bar on the west coast" is a recipe for disaster. Hardly a more perfect poison to kill existing jobs could be concocted. The proponents of these projects, knowingly or not, are systematically placing all of the elements of one of the worst man-made disasters our state could suffer.

The potential for damages and risk to existing jobs, to our communities, and to our futures far exceed the economic benefits the oil terminals would provide. To put it simply Grays Harbor is a poor choice for oil terminals.

The DEIS repeats this statement several times: "Although overall risks would be low, if a spill occurred the potential environmental damage would be significant these risks would remain even with implementation of mitigation." Our organizations agree. And if the impacts are significantly adverse, cannot be mitigated, and therefore unacceptable, the permits can and should be denied.

Response O57-3

Comment acknowledged.

Comment O57-4

COMMENTS SPECIFIC TO DEIS: All references to page numbers are specific to Imperium DEIS but the corresponding sections in Westway DEIS are also meant to be included. These projects are similar and cumulative in impacts and impacts in almost every case and every issue cannot be separated and are duplicated in both documents. There is statistical information unique to each and page numbers for each issue unique to each. Other than that there is no significant difference between the DEIS documents and therefore have not, (with noted exceptions), been referenced separately.

1. The comment period provided for the public to review and respond to a document over 3,000 pages has been inadequate. These projects will affect coastal communities and our entire region for decades. Although the impacts will span decades our chance to comment on our futures spans only 90 days. It was appreciated the 60 day comment period was extended. But in light of overriding deficiencies and omission of numerous scoping comments that were not recognized, acknowledged, or remain unanswered a longer vetting process or restart would seem more appropriate and likely provide a more productive process.
2. The DEIS does not recognize, acknowledge, or afford answers to scoping testimony offered by WDCFA. The Crab association testified at both scoping hearings in the spring of 2014 and submitted written testimony as well. Hundreds of other commenter's and comments were included in the scoping appendix "A"—but not ours. (Comments by the Quinault Nation, Oyster Growers, and USFW were also omitted.) Nor is there any place that I can find within the DEIS released on August 31, 2015 recognizing the oral comments at the two hearings held on scoping by anyone. More importantly, it seems that not only were our comments not recognized--the scoping issues we brought up and those of others, were not addressed. Had they been the DEIS might have been a more meaningful and helpful document. Their seeming omission demonstrates a serious flaw in the process, resulted in additional deficiencies in the DEIS, and is a disservice to those who will be affected most when these projects result in a major spill. Although the "missing" scoping comments have now been added as an attachment to the DEIS the scoping issues WDCFA raised in May of 2014, should have been a part of the consideration going into the DEIS. If this is the last step before a final EIS then for WDCFA and others who share our concerns-¬--¬- a major step in this process was not afforded us. I am attaching those comments to this testimony, expect inclusion by reference, and expect this time WDCFA comments will be adequately addressed.

Response O57-4

Pursuant to WAC 197-11-455, the lead agency for a SEPA proceeding shall provide 30 days for review of and comment on a Draft EIS. This may be extended by 15 days upon request. The co-lead agencies issued an extended 60-day comment period that was then extended to 90 days based on public requests to provide additional time for review and comment.

The co-leads reviewed and considered all scoping comments. Final EIS Appendix A, *Scoping Comments*, provides a catalog of all comments received during the formal scoping period. Responses to scoping comments resubmitted during the draft public comment period are addressed in Responses to Comments O57-30 through O57-40.

Comment O57-5

3. DEIS has a number of factual errors and consequently a number of misleading conclusions: Section 3.5- 28: on vessel strikes states "Large marine mammals, like whales, typically migrate and forage in deeper waters (outside three miles) and are not likely to enter the harbor". Actually Gray whales, the most prolific off of our coast, travel very close to shore, primarily within three miles, and often enter Grays Harbor. How the DEIS can be this inaccurate is troubling what is worse is that as a consequence a conclusion in the DEIS—"that increased marine mammal strikes from increased vessel traffic from this project is therefore unlikely"--- is patently wrong. Such inaccurate data begs the question how many other faulty data sets and misinformed conclusions hide within over 3,000 pages of this document?

Response O57-5

Draft EIS Chapter 3, Section 3.5, *Animals*, addresses the potential for vessel strikes on marine mammals. Final EIS Section 3.5 reflects additional information to address whale use of Grays Harbor, including frequent use by the gray whale. The vessel impact mechanisms described in Draft EIS Section 3.5 remain the same, but marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a higher risk from vessel strikes. Final EIS Section 3.5.5.2 *Proposed Action, Operations*, has been revised to reflect the higher risk for these species.

Comment O57-6

4. Inaccurate water flow data: 4.3-5 DEIS states: "In the harbor, current velocities in the navigation channels seldom exceed 3 knots." Actually currents in the Harbor exceeded 3 knots on 136 occasions in 2014. Source: "NOAA 2014 Current Tables".

Response O57-6

Draft EIS Chapter 4, Section 4.3.2.3, *Water Flow*, provides a general characterization of the conditions in the study area that influence the potential for impacts from an incident. The information on current velocities in the channels in Grays Harbor was obtained from The United States Coast Pilot published by the National Ocean Service (NOS) part of NOAA and the same government agency that publishes tidal current predictions computed by the Center for Operational Oceanographic Products and Services. The specific assumptions used in the oil spill modeling exercise are presented in Draft EIS Appendix N, *Oil Spill Modeling*. As noted, the trajectory analyses and oil concentration contours for three different release scenarios occurring within Grays Harbor

were developed using the General NOAA Oil Modeling Environment (GNOME™) software. For consideration of currents in oil spill modeling in Appendix N, the Location File created by NOAA and used for the oil spill modeling includes three "mover" files: one for tides (containing actual data from 2012 to 2015), one for river currents, and one for coastal currents. Each of these was created by NOAA and collectively they represent the baseline hydrodynamic conditions for the specific purpose of modeling oil spills in the harbor. Refer to the Master Response for Oil Spill Modeling Methods.

Comment O57-7

5. Oil Spill Model in Appendix N is not based on reality: In WDCFA scoping comments specific mention was made of the strong currents and bad weather events in Grays Harbor. Among our 5 other scoping comments we pointed out that current flows in Grays Harbor are very strong— exceeding one knot every day--and would result in reduced booming efficiency. Unfortunately, the oil spill model in Appendix N does not capture the reality of Grays Harbor flows. We specifically requested, in our essentially ignored scoping comments submitted in May of 2014, that the DEIS include adequate and accurate spill modeling. Instead, the model reads like a fairytale. Actual flow rates in Grays Harbor exceed the high flow model every day. (High flow in the model is described as .5 meters/second which is less than one knot). Since the model is not based on reality it has very little merit. The DEIS on page N-3 claims: "…..because model variables such as winds and currents are spatially constant within GNOME, they are reliable for harbor conditions". Actually the model is only reliable for "low" and "lower" flow conditions. The model does not capture the commonly occurring "high" flows in the Harbor. As a consequence the model is unrealistic and is not reliable. The fact is that regardless of federal and state preparedness and response requirements the majority of oil when spilled in or near Grays Harbor will not be contained and it will not be recovered.

Response O57-7

As discussed in the Master Response for Environmental Health and Safety Analysis, the analysis of potential environmental health and safety impacts looks at the relative risks for a set of release scenarios that could occur as the result of terminal operations and rail and vessel transport associated with the proposed action. The risk assessment in Appendix N, *Oil Spill Modeling*, does not predict precise locations or spill sizes where spills might occur but rather focuses on demonstrating how various inputs (e.g., weather conditions, water flow.) influence the potential movement of oil in the study area. This approach provides decision-makers and planners with a range of potential outcomes related to the proposed action to help them understand potential risks and identify targeted mitigation measures.

Additionally, as noted in the discussion of consequences in Draft EIS Chapter 4, *Environmental Health and Safety*, and in Appendix N, the release scenarios are based in part on regulatory requirements for contingency planning to consider worst-case discharges. To that end, oil trajectory modeling assumes an instantaneous release of the entire release volume and that no efforts to respond to or mitigate a release are made. As noted in Section 4.2, *Applicable Regulations*, several regulations are in place, including design standards for rail cars and vessels, to reduce the consequences of a spill in the event of an incident. However, rapid, coordinated response is critical to minimizing the consequences of an oil spill. Additionally, the analysis identifies potential risks that range from more likely but less severe to very unlikely but extremely severe. As noted in Sections 4.4, 4.5, and 4.6, which describe the potential for unavoidable and significant adverse

environmental impacts for terminal operations, rail transport, and vessel transport, respectively, no mitigation measures would completely eliminate the possibility of a large spill or explosion.

For more information about the inputs, assumptions, and methods used in the oil spill modeling, refer to the Master Response for Oil Spill Modeling Methods.

Comment O57-8

6. Oil Spill Model in Appendix N based on "make believe oil": The spill model presumes a medium weight crude oil as the proxy for spilled oil behavior in Grays Harbor. In truth two types of oil--- Bakken Shale; a light crude and Tar Sands; a heavy crude-- will move through our Harbor. Each of those oil types will behave radically different when spilled and require different prevention and spill response plans. There is no adequate discussion of spill response in the DEIS, specific to the sinking behavior of tar sands oil or the contrasting behavior of a highly volatile Bakken Shale oil that has ignited in the past when spilled. There is no adequate representation of how the differing oils will move or behave when spilled in the Harbor or along our coast in the DEIS. WDCFA scoping comments included a specific reference to Tar Sands oil and the need to plan specifically for its submerging behavior when spilled in fast moving sediment laden water (as is the case in Grays Harbor). Additionally, in the DEIS it is claimed that: "Medium crude oil was selected to present an over-estimation of persistence in the environment, comparable to an actual spill of Bakken crude oil or diluted bitumen." Unfortunately, unlike the description in the DEIS on Page b-2 that "most oil remained on the water surface in the Kalamazoo River spill"--two years after the only major Tar Sands, ("dilbit"), spill into US waterways (Kalamazoo River) over half of the spilled oil was estimated to have sunk and remained on the bottom of the waterway. Diluted Bitumen has proved to be very persistent when spilled. Similarly the Bakken Shale oil that spilled and exploded in Lac Megantic has proved more persistent than predicted and much of the oil that spilled into the river sank

   Page N-2 of the DEIS States: "The GNOME model requires selecting the specific type of oil for the modeled trajectories from a predetermined list of pollutants. Bakken crude oil and diluted bitumen, which are the two most likely types of oil under the proposed action, are not included in this list. Therefore, the GNOME model cannot fully reflect how these types of oils would behave or persist in the environment when spilled". In so far as the oil spill model in Appendix N— based on insufficient tidal modeling, faulty flows, and "make believe" oil--is a part of helping form spill response plans it will lead to a false sense of confidence in the ability to respond and it will not help provide very meaningful conclusions, plans, or mitigation.

Response O57-8

As discussed in the Master Response for Oil Spill Modeling Methods, Draft EIS Appendix N, *Oil Spill Modeling*, acknowledges the limitations of the selected modeling tool to consider Bakken crude oil or diluted bitumen specifically. The model developer was consulted to assist in finding a suitable proxy; medium crude oil was used based on their guidance. To provide additional information about the weathering behavior of these types of oil in the environment, a comparison of behavior of the medium crude oil proxy, Bakken crude oil, and diluted bitumen in the environment was competed using ADIOS and is presented in Appendix N.

Comment O57-9

7. By reference I include comment by Doug Zimmer, retired from USFW, on October 1, 2015 at Elma DEIS Hearing: 3.5-21 "The DEIS characterizes the effects of contaminants reaching a surface water body as short-term and temporary. The bottom and sides of the Grays Harbor estuary are soft soils – essentially mud – and the tidally-influenced rivers that feed the Harbor back flush for tens of miles in each tide cycle. The effects of toxic release in such areas are not short-term, nor are they temporary: rather they are chronic and persistent. Please review the effects of similar 6 releases into coastal estuaries during the Deepwater Horizon event for examples. Any toxics spilled into Grays Harbor water bodies are likely to be detectable and toxic for decades."

Response O57-9

The statement referenced in the comment applies to potential impacts of construction activities, which would be avoided or reduced through adherence to the conditions of the grade and fill permits that would be required for construction. These include a stormwater drainage control plan, temporary erosion and sedimentation control plan, and best management practices to reduce the potential for water quality and associated biological impacts resulting from soil disturbance. They would also require developing and implementing a spill prevention, control, and countermeasures plan; an oil spill prevention plan; and a site-specific construction stormwater pollution prevention plan that includes best management practices for material handling and construction waste management. The analysis of impacts from increased risk of accidents and related incidents (e.g., oil spills) is provided in Chapter 4, *Environmental Health and Safety*.

Comment O57-10

8. A more complete review of Bakken spill events around the nation and in Canada and the Tar Sands spill in Kalamazoo in 2010 must be included in the EIS: The cost of recovery of different oils spilled in the past was not included in the DEIS. An examination of spill response costs for various major spill events should be included. (So far the cost of recovering Tar Sands oil, (dilbit), in the Kalamazoo river spill--just under 1,000,000 million gallons--exceeds $1,500 a gallon without inclusion of compensatory or punitive damages). In the worst case spill scenario modeled in Appendix N what would be the estimated cost of recovery of spilled "dilbit"or of Bakken crude oil? Do the math. Who would pay those costs? Who pays when the cost of recovery exceeds liability coverage or financial ability to pay?

Response O57-10

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for an explanation of the scope of the analysis of potential economic impacts in Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Comment O57-11

9. Area of Impact studied is not inclusive of regional, national, or international impacts from these proposals: WDCFA scoping comments included the need for the DEIS to describe impacts both upstream and downstream of these projects on communities, environments and economies. Although most of the potential negative impacts lie outside the jurisdiction of the permitting agency they cannot be ignored. From North Dakota to Grays Harbor, from Grays Harbor to California and to Puget Sound, and potentially Asia, the impacts follow the crude. If the terminals are not built the impacts do not follow. So far the DEIS has done a good job of ignoring the larger impacts. The DEIS does not survive scrutiny in this regard. An example closer to home: As the Washington Department of Fish and Wildlife stated: v "If there were to be a spill the volume of product considered would likely lead to a catastrophic loss of Habitat. And the potentially affected area could be much larger than just Grays Harbor vicinity". I have seen no mention in the DEIS of the potential for spilled oil in or around Grays Harbor to inundate Willapa Bay and no mention of the potential negative impacts if this was to occur or any mitigation measures to address this event. The current DEIS study area is painfully inadequate for an assessment of actual impacts and risk.

Response O57-11

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3 and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal or in Grays Harbor, respectively. Section 4.6.2.1, *Oil Spills, Risks*, which describes the results of Appendix N, *Oil Spill Modeling*, acknowledges that, depending on spill quantity and conditions, an oil spill originating from a vessel just outside of Grays Harbor could oil shorelines within Grays Harbor and along the outer coast. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, including impacts on shellfish. The Final EIS section reflects the addition of potential impacts on commercial fishing and shellfish harvest resulting from potential impacts on fish and shellfish survival, closures of fisheries during response to an incident, and closures due to concerns for seafood safety from contaminants that may persist in the environment.

Comment O57-12

10. Restrictive study area in DEIS causing diminished recognition of true impacts: Example Chapter 3.5- 14 describes Dungeness crab catches in Grays Harbor. By confining discussion to crab populations in Grays Harbor and quantifying crab catches in Grays Harbor a false sense of the importance of Grays Harbor to the success of the overall coastal Crab fishery and value of Grays Harbor to the coastal crab resource is seriously understated. As a consequence the potential impact on crab from a major spill is easily misunderstood. Grays Harbor is a major nursery area for Dungeness crab and an essential fish habitat for many other species. The catches within the Harbor of crab, or for that matter salmon, and other species do not reflect the importance of a healthy estuary to the biological health of the resources or the economic value of resources dependent on it. The majority of resource value is captured in waters adjacent to Grays Harbor outside of the study area but would be severely impacted in the event of a major spill associated with these projects within the study area or along the transportation routes outside the study area.

    The average tribal and non-tribal coastal catch value of Dungeness crab is $44,000,000 per year. The DEIS in 3.5.4.3 Page 3.5-14suggests Grays Harbor only provided for about $30,000 (approx 10,000lbs) in non-tribal crab value in 2013/2014, and only on average a tribal catch value of approximately $21,000 per year from 1997-2012. A contradictory statement in the DEIS in 3.17.43 Page 3.17-19 and 20, suggests a 71,000 crab per year harvest in Grays Harbor for past six years, (approximately $390,000). In either case, Grays Harbor provides for juvenile populations of crab to flourish and is a major contributor to the success of the coastal crab fishery primarily occurring outside of Grays Harbor. The DEIS does not capture the truth---that the coastal crab 7 fishery (worth $44,000,000 annually) would be at risk from a major spill in or around Grays Harbor.

Response O57-12

Draft EIS Chapter 3, Section 3.5.4.3, *Grays Harbor*, describes the aquatic species and habitats in Grays Harbor and Pacific nearshore areas, including juvenile Dungeness crab and its highly productive rearing habitat in Grays Harbor. It recognizes that commercial harvest of Dungeness crab provides substantial inputs to the local economy of the communities surrounding Grays Harbor and to the coastal tribes. Final EIS Section 3.5.4.3 reflects updated Quinault-reported harvest information of 2.6 million pounds of crab annually on average from 2004 to 2013.

Comment O57-13

11. Protection of crab fishery: In our May 2014 scoping comments we pointed out the risk to the coastal crab fishery and asked what plans would be in place to protect the crab fishery and those dependent on it in the event of a spill? There is no discussion In the DEIS of our request. We also asked how do you rebuild an estuary if a catastrophic loss of habitat occurred? Again no response in the DEIS. Unfortunately we know the answer--it cannot be mitigated and we will wait decades for it to heal.

Response O57-13

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing

regulations and proposes additional mitigation measures in Sections 4.4.2, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or within Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including effects of oil on Dungeness crab. Final EIS Section 4.7 reflects the addition of potential impacts on commercial fishing and shellfish harvest resulting from potential impacts on fish and shellfish survival, closures of fisheries during response to an incident, and closures due to concerns for seafood safety from contaminants that may persist in the environment.

Comment O57-14

12. Vessel traffic impacts: As was mentioned earlier the DEIS conclusion that increased vessel traffic from projects would not likely lead to increased vessel strikes with large marine mammals was patently wrong.

Response O57-14

Refer to Response to Comment O57-5 regarding how the Draft EIS addresses potential impacts on marine mammals.

Comment O57-15

Similarly conclusions that these projects will not interfere in any serious way with small boat navigation, commercial fishing, sport charter operations, and recreational boating and fishing is also wrong. Once again the lack of knowledge within the study area is evident. And once again the limited study area of the DEIS also limits a true understanding of potential impacts. The new tanker and ATB traffic will of course] cause increase potential for interference with other vessel navigation both large and small. It will of course] increase likelihood of collision at sea and in Harbor approaches, (especially in dense fog events that although episodic, are persistent, and will always occur in the Harbor and on the coast). It will of course] increase interaction with and preemption of fixed gear fisheries in coastal waters adjacent to Gray Harbor. Every year long line gear and crab pots are run over, drug off, and destroyed by large vessel activity" that interference will only increase with the new tanker and ATB traffic from these projects. And increased vessel traffic will of course increase interference impacts all along the coast especially outside the current study area.

Response O57-15

Draft EIS Chapter 3, Section 3.17.5.2, *Proposed Action, Operations, Conflicts with Commercial Fishing*, acknowledges that increased vessel traffic related to the proposed action could affect commercial fishing activities by restricting access to certain areas in the harbor, especially during the fall salmon fishery. Mitigation described for tribal resources in Section 3.12.7.1, *Applicant Mitigation*, would reduce the potential impacts on commercial fishing. Section 3.17.8, *Would the proposed action have unavoidable significant adverse impacts on vessel traffic?* clarifies the rationale for the impact conclusion. Recreational fishing is addressed in Section 3.10, *Recreation*. Chapter 4, Section 4.6,

Environmental Health Risks—Vessel Transport, presents an analysis of potential impacts from increased risk of vessel collisions, groundings, and allisions and related consequences (e.g., release of crude oil) under the proposed action and proposes mitigation measures to reduce the likelihood of a vessel incident.

Comment O57-16

In WDCFA's ignored scoping comments we stated: "at the present time agreements between towboat operators and the fixed gear crab fishery are in place. These agreements are facilitated through Sea Grant. Agreements provide for designated towboat lanes entering and leaving Grays Harbor. The lanes help to minimize interaction and damage to crab pots, (estimated 100,000 pots on Washington Coast), and vessels and to minimize pre-Â¬-emption of fishing areas by shipping activities. These lanes are described for the length of the coast not just at the entrance to Grays Harbor. Will existing towboat agreements remain in effect with the expected increase in shipping traffic from CBR proposals?

Response O57-16

Draft EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels*, provides information about Brusco Tug & Barge and the nature of its current contract with the Port of Grays Harbor.

Comment O57-17

If wider lanes are needed to accommodate increased traffic or if "Safety Zones" have to be in place to accommodate increased traffic and/or hazard cargo transport, who will mitigate for lost fishing opportunities and areas? There is no mention or discussion of these potential impacts or any proposed mitigation for them in the DEIS.

Response O57-17

The proposed action would not require the widening of Grays Harbor Navigation Channel lanes to accommodate vessels going to or coming from the project site.

Comment O57-18

13. Vessel Staging Areas are extremely limited: The DEIS states that: 3.17-10 "The current deep-draft areas, (anchorage area), can accommodate three large deep-draft vessels…." With present large vessel traffic and expected new large vessel traffic vessel trips will be well over 1,000 per year with all three projects and in excess of 900 in 2017 from Imperium (table 3.17-11) and Westway (table 3.17-11). It is likely that in Harbor staging and anchorage areas will not be sufficient-- especially in bad weather and conflicting scheduling or both. When that occurs large vessels will have to "lay-to", or idle off-shore or anchor outside of Grays Harbor to wait for a change in the weather or transit/berthing space to free up. Large vessels "laying--to" or idling around or at anchor outside Grays Harbor will interfere, preempt, or damage fixed gear fisheries such as crab and interfere and preempt mobile gear fisheries such as trolling or charter and recreational fishing. There is no mention of these potential impacts in the DEIS. WDCFA scoping comments asked "Are staging areas adequate to accommodate expected increases in shipping traffic? Will staging area be designated? Where will ships and ATBs await a turn to load? Where 8 will ships and ATBs await bad weather events?" Thus far DEIS fails to answer those questions adequately.

Response O57-18

As described in Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*, state-licensed pilots work with the vessel operators to schedule vessel transits and to prevent any bottlenecks. Final EIS Section 3.17.4.4 reflects additional information related to the role the pilots in preserving a safe vessel traffic system, the vessel traffic management process, and how federal and state vessel inspections support the safety of the waterway by monitoring vessel compliance with international and U.S. laws. Moreover, Section 3.17.7.1, *Applicant Mitigation,* includes a measure proposing that the applicant work with other port stakeholders to propose, develop, and implement a formal vessel management system and measures to ensure safe tug escort of laden tank vessels.

Comment O57-19

14. Vessel Traffic numbers do not add up Page 3.17-18 Imperium report states: "Comparing the actual number of trips (Table 3.17-7) to the established number of windows by vessel draft confirms the assumptions of this analysis are conservative. For example, 41 VESSELS, (emphasis added), with drafts of more than 32 feet transited the harbor in 2012 compared to an estimated 21 navigable windows per year." The fact is the table is expressed in TRIPS not vessels and while the analysis might be conservative the conclusion is off by a factor of two. There were only 21 vessels over 32 feet in draft that transited Grays Harbor in 2012.

Response O57-19

Final EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels,* clarifies that 41 vessel trips with draft of more than 32 feet transited the harbor in 2012, compared to the 21 navigable windows for this depth.

Comment O57-20

15. Vessel Traffic and maintenance dredging operations: If all three proposed terminals are built an additional 728 vessel transits are expected. These two proposals in the current DEIS are expected to add 638. Grays Harbor undergoes yearly maintenance dredging operations. The dredges obviously operate in the channel months at a time. How does such an expected volume of vessel traffic co-exist with dredging operations? How much longer will dredge operations take if the dredge needs to move with every passing? Will large laden tanked vessel traffic close to dredge operations add to collision risk? The DEIS proposes no opposing deep draft traffic will be in the channel with any laden tanked vessel transit. How does that reconcile with large dredge vessels that operate, (when on site), in the channel 24/7? With my limited opportunity to review 3,000 pages of DEIS I have not discovered any discussion of this vessel traffic issue.

Response O57-20

No revision to the EIS is required. The proposed action does not include dredging or require deepening of the navigation channel to accommodate proposed vessel traffic. Draft EIS Section 3.17, *Vessel Traffic*, evaluates the capacity of the Grays Harbor Navigation Channel to accommodate project-related vessels over the 20-year planning period. The analysis considers existing, 2017, and 2037 depths, based on the U.S. Army Corps of Engineers Grays Harbor Navigation Channel

Deepening EIS.3 Impacts on vessel traffic from dredging activity from the U.S. Army Corps of Engineers' Navigation Improvement Project would be discussed in the EIS for that project.

Comment O57-21

16. Disposal of Oil Contaminated Dredge Spoils: In the event of a major spill--especially of "dilbit"-- or contamination of Grays Harbor sediments by smaller spills from the day to day operations of these projects, how and/or where would oil contaminated dredge spoils be remediated? Even without the increased dredging operations expected with the Grays Harbor Navigation Improvement Project upwards of 1.7 million cubic yards of dredge material is transported and dumped in the marine waters in Grays Harbor or nearby outside dredge disposal sites annually. Oil contamination of sediments from these projects will occur. How much or how soon none of us know. But it will occur. There is no mention or recognition anywhere in the DEIS for monitoring plans, contingency plans, or mitigation for these inevitable events and disposition of contaminated dredge spoils.

Response O57-21

The proposed action would not include dredging.

Comment O57-22

17. Exclusion of non-tribal fishery and mariculture impacts: There is no mention under the list in table S-3 under "environmental damage from oil spills, fires or explosions" of non-tribal extraction industries such as fishing and mariculture. The non-tribal fishing and mariculture industries in Grays Harbor, in Willapa Bay, and on the outer coast generate well over $100,000,000 of landed value every year. By the time these products move through processing, transportation, and market networks they generate in excess of $300,000,000 in economic value to our State and coastal economies. Yet there is hardly any mention of the potential negative impacts in the DEIS to these sizeable economic contributors. All of these extraction industries are dependent on good water quality, on the protection and preservation of our estuaries, on public perception of a clean and safe food supply chain and access to extraction locations. There is a major, legitimate, and deep rooted concern over the compatibility of re-making Southwest Washington into a major crude oil exporting hub and the continued success of marine resource based sustainable industries. Hardly any serious consideration of the potential conflict between these oil terminal projects and our coastal culture, heritage, and economies is reflected in the DEIS. The DEIS has failed to capture the true economic displacement and human misery that would occur both upstream and downstream of these projects when things go seriously wrong. By reference: DEIS comments from the United States Department of Interior (USFW) dated 10/29/2015 states a similar position: "The cost—benefit analysis included in the Draft EIS's fail to acknowledge or consider significant impacts, damages, and costs."

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[3] [1] U.S. Army Corp of Engineers 2014. *Draft Supplemental Environmental Impact Statement for the Grays Harbor, Washington Navigation Improvement Project General Investigation Feasibility Study*. Seattle District. January.

Response O57-22

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O57-23

18. ATB Quandary: In the executive summary page S-56 a mitigation for reducing the "….likelihood of an incident involving spill of crude oil within Grays Harbor compared to the no-action alternative…." a mitigation measure is prescribed that requires a tethered tow for laden tankers while transiting Grays Harbor. First it is unclear what "while transiting Grays Harbor" means. At what point in the transit is the tether required or not required? Additionally, while a tug escort is required for both Tankers and ATB's "between the Hoquiam River and the Grays Harbor entrance" why is a tethered tow not prescribed fo a laden ATB? ATB's can carry large amounts of oil some over 7,000,000 gallons. The crew on an ATB is much smaller than on a tanker yet the load is significant and damage from mishap could be just as catastrophic as a laden tanker. Why with less crew to respond in an emergency situation and a similar risk is an ATB not required the same safety precautions as a laden tanker? Another prescriptive mitigation measure in this section prohibits the "…transit of any other deep draft vessels within the South Reach of the Navigation channel (just off Westport) to terminal 1 in both directions whenever a laden tank vessel is transiting within the same channel". As was mentioned earlier how does this prescription reconcile with deep draft and other dredge vessels operating in the channel? And where exactly does the restriction on opposing vessel traffic end on the laden outward bound passage? If inbound "bunker" oil laden vessels require escorts or tethers where would the escort or tether begin?

Response O57-23

A separate proposed mitigation measure describes the developed of tethering and other requirements in coordination with the Port of Grays Harbor. The tethering requirement only applies to tankers because of their onboard propulsions. Final EIS Chapter 4, Section 4.6, *Environmental Health Risk—Vessel*, clarifies that the measure proposing restriction of deep-draft vessels during tank vessel transits would apply to the navigation channel. Final EIS Chapter 2, *Proposed Action and Alternatives*, clarifies that proposed operations would not include vessel bunkering (fueling) at the project site. Final EIS Chapter 4, Section 4.6 reflects additional information about federal and state regulations related to bunkering operations.

Comment O57-24

19. Bunker refueling Operations: At the present time little or no (heavy oil) "bunker" refueling occurs in Grays Harbor. This potential activity to service vessels from these projects is referenced on S-58. There is no adequate review, mitigation, prescriptions or protocols for over water transfers of bunker oil between oil transport vessels and bunkering vessels described in the DEIS. If in-bound laden "bunker" oil vessels are to transit Grays Harbor what increased risk from collision, allsion, grounding or spills would likely result from this activity? How many additional oil laden tank vessel--tanker, ATB, or oil barge--transits will occur from refueling "bunkering" activity? How many gallons will be transported and "bunkered"? What grades of fuel oil will be transported? The bunker C oil spilled from the oil barge Nestucca was very persistent in the environment, traveled subsurface hundreds of miles and took years to degrade on its own. No mention or quantification of the risks from "refueling" operations are included in the DEIS and no mitigation is offered.

Response O57-24

No bunkering (refueling) activities currently take place in Grays Harbor and refueling is not part of the proposed action. However, should bunkering in Grays Harbor take place, mariners and vessel owners and operators would have to comply with applicable federal and state regulations (33 CFR Parts 155 and 156; 46 CFR Parts 12, 15, and 35; WAC 317-40). Draft EIS Chapter 3, Section 3.17.7.1, *Applicant Mitigation*, presents measures stating that the applicant will review all required procedures in the event bunkering activities do take place in the Port of Grays Harbor. The amount of bunker fuel aboard a tank vessel cannot be determined at any given point in time. The information depends on many factors such as the size of the vessel, the length of the voyage, and the time of the previous bunkering. Generally, commercial vessels use Intermediate Fuel Oil Bunker C.

Comment O57-25

20. Use of the word "could" instead of "would" to describe increased risks from these projects: There are many places in the DEIS where increased potential for impacts and risks from these projects whatever that risk may be--public safety, public health, fire, explosion, collision, spills, etc. are referred to as "could" occur. In almost every case the potential for increased risks "would" occur. Of that there is little doubt. The DEIS uses the word "would" and "could" as if they are interchangeable—they are not. The DEIS should be consistent and reflect that reality.

Response O57-25

Comment acknowledged.

Comment O57-26

21. Risk Assessment and likelihood of vessel spill events: With the volume of oil considered it will only take one major spill event to cause unmitigated damage. As WDFW has stated: "Grays Harbor is an area particularly sensitive to the adverse effects of oil spills. If there were to be a spill the volume of product considered would likely lead to a catastrophic loss of Habitat." And USFW scoping comments stated: these projects pose "unacceptable risk". While the DEIS repeatedly claims that; "overall risks would be low" the DEIS also repeatedly

recognizes that; "if a 10 spill occurred, the potential damage would be significant. These risks would remain with implementation of mitigation".

Response O57-26

Comment acknowledged.

Comment O57-27

According to Figure S-3, (the "slide-bar" characterization of likely spill events from differing vessel incidents), spills from vessel incidents are more likely rather less likely to occur. Unlike Puget Sound or the Columbia River tanked vessel traffic in and out of Grays Harbor will exceed non-tanked vessels by a ratio of more than six to one. No mention of this high incidence of tanked vessel traffic relative to other vessel traffic is referenced in the DEIS document. Not only will a vessel incident "likely" more than "unlikely" result in a spill-- the vessel most likely to be involved in a vessel incident in or near Grays Harbor will be a tanked vessel. Additionally, there is no recognition of risk from increased tanked "bunkering "vessel traffic included in the risk assessment analysis. "Bunkering" vessels will further raise the ratio of tanked to non-tanked vessel traffic and increase potential spill risk.

Response O57-27

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS. Draft EIS Chapter 6, Section 6.4.2; Table 6-1, Reasonably Foreseeable Future Actions Contributing to Cumulative Impacts; Table 6-3, Vessel Traffic for Reasonably Foreseeable Future Actions; and Table 6-18, Cumulative Vessel Trips per Year—Cumulative Projects provide detail on the overall increase in vessels expected in Grays Harbor. The frequency analyses for the proposed action and the cumulative scenario both recognize traffic in the areas and the restrictions on the navigation channel while an oil tanker is navigating the channel.

Comment O57-28

As a commercial fisher for 45years, and after personally losing a season to the "Exxon Valdez" and having helped document bird deaths from "Nestucca", it is hard to reconcile personal experience with the risk assessment claims in the DIES "….that a chance of a release each year increases as follows: once in 45 years for a collision, once in 116 years for an allsion and once in 128 years for a grounding."

As has been the case throughout this document the selective scope of the study area, and in this instance an exclusion of a major risk activity-- "bunkering", has led to an under estimation of impacts from these projects and has also led to a risk assessment that seems to fall far short of reality and experience.

These projects will impact vessel traffic all along the Pacific Coast, from California to Puget Sound, and eventually other world ports. To confine impacts and risks from vessel spills associated with these projects in the DEIS to the navigation channel of Grays Harbor is fundamentally flawed and challenges credulity. Many vessel spill incidents of significance have occurred on the Pacific Coast and inland waters in the last 45 years. The following list only includes spills over 10,000 gallons:

Washington State: 1. 1972 "USS General M.C. Meigs" spilled 2.3 million gallons of heavy fuel oil. 2. In 1984 tanker ship "Mobiloil" leaked 233,000 gallons of heavy fuel oil. 3. 1988 "Arco Anchorage" spilled 239,000 gallons of crude oil. 3. 1988 tank barge "MCN-5" spilled 67,000 gallons of heavy cycle Gas oil. 4. 1988 "Nestucca" barge spilled 231,000 gallons of heavy bunker C oil. 4. 1991 "Tenyo Maru" spilled 361,000 gallons of bunker oil. 5. In 1994 Crowley Maritime Barge "101" spilled 26,936 gallons of diesel oil.

Oregon: 1. 1997 "New Carrisa" spilled estimated 70,000-140,000 gallons of heavy bunker oil. 2. 2001 "MS Tristan" spilled 12,000 gallons of heavy bunker oil.

California: 1. 1971, 1,121,400 gallons of oil were spilled after the tank vessels "Arizona" and "Oregon Standard" collided in fog under the Golden Gate Bridge. 2. 1984, the tanker "Puerto Rican" exploded and spilled approximately 1 – 1.5 million gallons 3. 1996, the "SS Cape Mohican" spilled 90,000 gallons of heavy bunker oil 4. 2007 "Cusco Buson" spilled 54,000 gallons of bunker oil.

Response O57-28

The cited accidents occurred over the last 45 years over a much larger area. If the results from the Draft EIS were scaled for that duration and all the activity in the much broader area, the results would be consistent with the accident history cited.

The estimated accidents per year cited in the Draft EIS can be multiplied by the analysis period for proposed action (2017 to 2038) to get estimates for that 20-year period.

Refer to the Master Responses for Risk Assessment Methods for information about bunkering in Grays Harbor and applicable regulations

Comment O57-29

CONCLUSION: There are many Deficiencies within the Draft EIS. Inaccurate data and calculations have lead to several contradictory and misleading statements and conclusions. The scoping process was not inclusive and was 11 fundamentally flawed. As a consequence many of the issues raised were not considered or answered. The study area is woefully inadequate to include a true estimate of the costs and impacts of these projects. Limiting the study area may limit impacts described but it does not make those impacts disappear. Much of the mitigation measures prescribed are unrealistic, insufficient and will fall far short when pre-planned action translates into a real-time reaction to an emergency.

Although deficiencies exist in the DEIS the Document contains a core kernel of truth—a fundamental fact—that these projects if they move forward carry great risk that cannot be mitigated. WDCFA refers to the DEIS statement: "A large oil spill, fire, or explosion would likely cause unavoidable and significant adverse environmental impacts. The likelihood of a large spill or related fire or explosion is relatively low; however, the potential for significant consequences to the environment and human health if such an incident was to occur is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. No mitigation measures would completely eliminate the possibility of an incident, nor would they completely eliminate the adverse consequences of an incident. Spill prevention, preparedness, and response requirements are intended, (emphasis added), to reduce likelihood of a spill during vessel transport and the resulting

environmental damage. Implementation of Mitigation (Table S-1) would further reduce the risks. Although the overall risks would be low, if a spill occurred; the potential environmental damage would be significant. These risks would remain even with implementation of mitigation."

In May of 2014 the United States Fish and Wildlife Service (USFW) stated in scoping comments "…the Service believes that redevelopment proposals bringing CBR to properties managed by the Port, including but not limited to the current Westway and Imperium proposals, would bring unacceptable risks to fish and wildlife…." WDCFA and members of the Coalition of Coastal Fisheries (CCF) agree with the core truth of the DEIS--that the impacts from these projects cannot be mitigated-- and the assessment of USFW—that the risks are unacceptable. The potential for damages and risk to existing jobs, to our communities, and to our futures far exceed the economic benefits the oil terminals would provide. WDCFA and CCF contend that if the impacts are significantly adverse, cannot be mitigated, and therefore unacceptable, the permits can and should be denied.

Respectfully,

Larry L. Thevik 1st Vice President of Washington Dungeness Crab Fishermen's Association, WDCFA 360 289 2647, 360 581 3910

Dale Beasley President of Coalition of Coastal Fisheries, CCF 360 642 3942, 360 224 0096

Response O57-29

Comment acknowledged.

Comment O57-30

WASHINGTON DUNGENESS CRAB FISHERMEN'S ASSOCIATION

P.O. Box 2678, Westport, WA, 98505

May 27, 2014

Imperium and Westway Environmental Impact Statements

c/o ICF International

710 Second Ave, Suite 550

Seattle, WA 98104

Scoping comments of WDCFA (Washington Dungeness Crab Fishermen's Association of Westport WA) on the Proposed Imperium and Westway EIS:

The Washington Dungeness Coastal Crab Fishery is recognized as a sustainable fishery with very little by-catch. Dungeness crab is marketed domestically and worldwide. Tribal and non-tribal coastal catches routinely provide $35,000,000-$60,000,000 in ex-vessel value each year and direct employment of approximately 600 fishers. The members of our association are very concerned over the environmental, economic, and community impacts and unintended consequences of the "Crude by Rail projects" (CBR) proposed by Imperium, Westway, and US Development.

When considering the scope of the environmental issues of these projects there are plenty to go around and impact communities and environments over vast areas both upstream and downstream of the sites of these projects. From the facilitation of a controversial extraction technology, to the transportation of highly volatile crude over many miles of weary and worn railroad tracks-- in marginally safe rail cars, to the lack of adequate emergency response teams in all of the communities these trains pass through, to the storage and transfer facilities supervision and safety, to the barges and ships transporting the oil through highly sensitive and highly valued marine resource environments, the impacts will follow the crude. If the scope of the EIS follows the crude the true impacts involved in these projects will become clear.

Response O57-30

Refer to the Master Responses for Purpose and Focus of the EIS and Geographic Scope of the EIS for a discussion of the scope and approach to the EIS analysis.

Comment O57-31

Many of our members have been directly affected by past oil spills -- the Exxon Valdez 1989 crude oil spill in Alaska, the Nestucca barge bunker oil spill in 1988 off of Grays Harbor, and the Cosco Buson 2007 bunker oil spill in San Francisco Bay are some examples. Those members witnessed first-hand the difficult task of recovery of oil on water and shorelines. While many "plans" are in place for recovery response in case of spills, the practical reality of recovery is daunting, desperate, and most often overwhelming. Booming is our first defense in the advent of a spill. Booming loses effectiveness in strong current or rough water or both. Ebb Tide in Grays Harbor regularly exceeds four knots. Fall and winter gales blow strong and often-- unless a spill occurs during daylight hours, with no wind, at a slack tide, and in calm water—booming will offer little defense against a spill. Booming may work well in some places but not in Grays Harbor. Once the Bakken crude oil supply has been depleted, the facilities will likely be used for Alberta oil-sand derived crude oil, much of which will sink, rendering booming useless.

Response O57-31

Refer to Response to Comment O57-1.

Comment O57-32

Storing highly volatile crude in storage tanks on seismically sensitive and tsunami vulnerable shoreline within 70 miles of the Cascadia Subduction zone welcomes trouble. Transferring highly volatile crude to a ship or barge and then transiting through a highly sensitive and highly productive resource environment is a recipe for disaster. With the volume of oil to be transferred and the number of vessels expected annually spills are inevitable.

Response O57-32

Refer to Response to Comment O57-2.

Comment O57-33

WDCFA expects that the scoping document in the EIS include but not be limited to the following for all the proposed facilities:

1. An evaluation of the economic impacts of projects including identification and quantification of benefits and identification and quantification of economic risk to existing jobs and communities both upstream and downstream of these projects. What local jobs will be created what existing jobs are in jeopardy?

Response O57-33

Refer to Response to Comment O57-10.

Comment O57-34

2. What areas and human populations are threatened in advent of spill, fire, and/ or explosion in transit of oil by rail, in shore-side oil storage areas, and from the marine exchange and transport of oil?
3. In the event of various oil spill volume scenarios and differing weather and current conditions where will the oil go? What areas will be affected? What marine species, marine mammal populations, and bird populations may be threatened or live in the spill area footprints? The Nestucca oil barge "holed" in 1988 on the North Jetty of Grays Harbor spilled approximately 250,000 gallons of "bunker oil" and killed an estimated 56,000 birds. The Exxon Valdez spilled approximately 11,000,000 million gallons of "crude" oil in 1989 in Alaska and soiled 1,100 miles of coastline.
4. What are tidal current velocities in Grays Harbor at various locations along proposed transit routes? How often do gale force winds blow in the Grays Harbor Area? What is the effect of wind and current on oil boom effectiveness? A clear understanding of water flow dynamics from tide, wind, and currents within Grays Harbor, into and out of Grays Harbor, and along the Pacific Coast is essential to creating an adequate response plan.
5. What is the contribution of freshet flows to current speed and what is their frequency?
6. What is the scale of a potential spill from these projects?

Response O57-34

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment O57-35

7. What spill response assets will be in place? How effective are response plans in strong currents and bad weather? How do spill response plans differ if a spill occurs along the Chehalis River, river? In Grays Harbor? In the Pacific Ocean?
8. What does a worst case scenario look like and what are the plans for a worst case scenario?
9. Who will pay for spill response and recovery? Who will pay for environmental damage and damage to existing economies? How do you rebuild an estuary?

Response O57-35

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information.

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Comment O57-36

10. How well suited are the storage and transfer sites to withstand earthquakes of differing magnitudes and Tsunamis of differing wave heights?
11. How long will it take for a Tsunami generated by a seismic event along the Cascadia Subduction Zone to reach the proposed terminal sites?
12. Is the soil of these sites subject to liquefaction in the event of an earthquake? What engineering is in place to compensate? Is it adequate?

Response O57-36

Refer to Response to Comment O57-2.

Comment O57-37

13. How will increased ship and barge traffic associated with these projects be managed? What will be the expected increase in ship and barge traffic? Will collision avoidance systems be in place?

14. Ships are required to have Harbor Pilots. Will new tug traffic be required to have escorts or pilots? What requirements will be in place to insure all tug captains are familiar with Grays Harbor before crossing the bar, entering the Harbor, navigating the channel, or disembarking with 6,000,000 gallons of crude in tow?

15. Grays Harbor has limited deep water areas to stage ships or tugs. What staging areas are available to ship and tug traffic? Are staging areas adequate to accommodate expected increases in shipping traffic? Will staging area be designated? Where will ships and tugs and barges await a turn to load? Where will ships and tugs await bad weather events? Who will co-ordinate these activities?

16. With deep waters areas in Grays Harbor limited at this time is the Grays Harbor Navigation Improvement Project intended to help provide more staging area for vessels transporting oil? What are the impacts of increased dredging operations on crab, oysters and other benthic species?

Response O57-37

Dredging is not proposed as part of this project. Refer to Final EIS Chapter 3, Section 3.17, *Vessel Traffic*, for a discussion of potential impacts on vessel traffic, including the use of tugs related to the proposed action.

Comment O57-38

17. The coastal crab fishery provides millions in economic benefit to coastal communities. What plans would be in place to protect the crab fishery and those depending on it in the event of a spill?

18. At the present time agreements between towboat operators and the fixed gear crab fishery are in place. These agreements are facilitated through Sea Grant. Agreements provide for designated towboat lanes entering and leaving Grays Harbor. The lanes help to minimize interaction and damage to crab pots, (estimated 100,000 pots on Washington Coast), and vessels and to minimize pre-emption of fishing areas by shipping activities. Will existing towboat agreements remain in effect with the expected increase in shipping traffic from CBR proposals? If wider lanes are needed to accommodate increased traffic or if " Safety Zones" have to be in place to accommodate increased traffic and/ or hazard cargo transport, who will mitigate for lost fishing opportunities and areas?

Response O57-38

Refer to Response to Comment O57-10. There are no proposed changes to agreements currently in place related to the proposed action.

Comment O57-39

19. If Alberta Tar Sands oil transport is in Gray Harbor's future how will a spill response plan which is based primarily on the booming and recovery of oil on the surface be effective against a heavy crude oil that will likely sink?

20. Is the transportation of heavy crude through Grays Harbor included in these proposals? Would approval of this project as proposed set the stage for heavy crude transport by the applicants without additional scrutiny or procedural or permit requirements?

21. What are the spill response plans specific to a "heavy" crude oil spill event?

Response O57-39

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Comment O57-40

22. What are alternatives to these proposals?

WDCFA thanks those responsible for forcing a formal EIS process on the proposed oil terminal projects and associated high volume crude oil shipping from Port of Grays Harbor terminals. WDCFA expects our requests for specific scoping questions be as seriously considered as WDCFA members are as seriously concerned.

Thanking you in advance,

Ray Toste, WDCFA manager 360 268 1513

Larry Thevik, WDCFA, 1st Vice President 360 289 2647

Response O57-40

Refer to the Master Response for Project Objective and Alternatives.

O58, Washington Dungeness Crab Fish Association, Larry Thevick

Comment O58-1

My name is Larry Thevickc (phonetic), I'm speaking on behalf of the Washington Dungeness Crab Fishermen's Association, the Washington Troller's Association, the Westport Charter Boat Association, and the Coastal Coalition of Fishes.

The first issue with the DEIS and this procedure is the public comment period is inadequate.

Response O58-1

Pursuant to WAC 197-11-455, the lead agency for a SEPA proceeding shall provide 30 days for review of and comment on a Draft EIS. This may be extended by 15 days upon request. The co-lead agencies issued an extended 60-day comment period that was then extended to 90 days based on public requests to provide additional time for review and comment.

Comment O58-2

Secondly, the document has a number of errors and consequently a number of misleading conclusions.

The first error that I noticed was the statement on passable vessel strikes with marine mammals. And I quote, Large marine mammals like whales typically migrate in four-inch or deeper miles outside three miles, and are not likely to enter the harbor, unquote.

In truth, gray whales, the most prolific off of our coast, travel very close to shore primarily within three miles, and they often enter Grays Harbor.

Response O58-2

Final EIS Chapter 3, Section 3.5.4.3, *Grays Harbor*, clarifies whale use of Grays Harbor and provides additional information on gray whales, humpback whales, and killer whales. Draft EIS Section 3.5.5.2, *Proposed Action*, addresses potential vessel collisions with marine mammals. Final EIS Section 3.5.5.2 clarifies that marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a higher risk from vessel strikes and further describes the potential for an incremental increase in risk with the increase of vessels related to the proposed action.

Comment O58-3

Another more important shortfall is the oil spill modeling. The difference between the model and the reality of Grays Harbor should be obvious. The model describes three spill scenarios with two flow rates in each.

A flow rate is described as 0.2 meters per second; the high rate is 0.5 meters per second. The low flow and the high flow in the model are both under one knot.

Though in the real world, the current in Grays Harbor exceeds one knot four times a day and was 3.5 knots or more 112 times in 2014. That's 3.6 times your make believe model.

By the way, booming of oil is not very effective in speeds over one knot. The problem with the data in this model and in other places in the DEIS, is it will lead to conclusions that will not reflect the reality of what will happen when a major spill occurs.

Response O58-3

For a response to an actual spill, the oil trajectories are developed with real-time environmental data. Protection, containment, and recovery strategies are developed to account for actual environmental conditions. In Final EIS Appendix N, *Oil Spill Modeling*, the footnote (originally footnote 8 on page N-3) related to scaled river flows has been removed.

Refer to the Master Response for Oil Spill Modeling Methods.

Comment O58-4

There are other deficiencies in the document. Without sufficient time to evaluate the DEIS carefully, many of these deficiencies will go unnoticed and the public with not find the truth.

In closing, I will close with this. The document repeats this statement several times: Although overall risks will be low, if a spill occurred the potential environmental damage would be significant, these risks will remain even with implementation of mitigation, our organizations agree and the impacts are significantly adverse, cannot be mitigated, and therefore unacceptable and the permits can and should be denied.

Response O58-4

Comment acknowledged.

O59, Washington Dungeness Crab Association Fishermen's Association WDCFA and Coastal Coalition of Fisheries CCF, Larry Thevik

Comment O59-1

My name is Larry Theuik. I'm speaking on behalf of the Washington Dungeness Crab Association, the Westport Charter Association, the Washington Trollers Association, and Coastal Coalition of Fishers.

The DEIS has a number of errors, consequently a number of misleading conclusions. For example section 3.5-28 vessel strikes states large marine mammals like whales typically migrate and forage in deeper waters outside three miles and are not likely to enter the harbor.

Actually Gray Whales, most prolific off of our coast, travel very close to shore primarily within three miles and often enter Grays Harbor.

Response O59-1

Final EIS Chapter 3, Section 3.5.4.3, *Grays Harbor*, clarifies whale use of Grays Harbor and provides additional information on gray whales, humpback whales, and killer whales. Draft EIS Section 3.5.5.2, *Proposed Action*, addresses potential vessel collisions with marine mammals. Final EIS Section 3.5.5.2 clarifies that marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a higher risk from vessel strikes and further describes the potential for an incremental increase in risk with the increase of vessels related to the proposed action.

Comment O59-2

Another important example, the oil spill model in Appendix N reads like a fairy tale. The difference between the model and Grays Harbor is obvious to us. Actual flow rate of Grays Harbor exceed the height flow model every day.

The type of oil used in the spill model is also make believe. The spill model presumes a medium weight crude oil for spilled oil behavior in Grays Harbor.

There are two types of oil, Bakken shale, a light crude, and tar sands, a heavy crude, will move there through our harbor. Each of those oils will behave erratically different when spilled and will require different prevention spill response plan.

There is no adequate discussion of spill response in the EIS specifically to the sinking behavior of tar sands, oil, or the contrasting behavior of a highly volatile Bakken shale oil that has ignited in the past when spilled.

Response O59-2

Refer to the Master Response for Oil Spill Modeling Methods.

Comment O59-3

Without adequate time for the public to review the EIS carefully, many deficiencies will go unnoticed and the DOE will not provide a meaningful document. The DOE and project proponent must provide more time for comments.

Response O59-3

Pursuant to WAC 197-11-455, the lead agency for a SEPA proceeding shall provide 30 days for review of and comment on a Draft EIS. This may be extended by 15 days upon request. The co-lead agencies issued an extended 60-day comment period that was then extended to 90 days based on public requests to provide additional time for review and comment.

Comment O59-4

Although overall risks would be low, and this is a quote from DEIS, if a spill occurs potential environmental damage would be significant. These risks would remain even with implementation of mitigation. Our organizations agree. And if the impacts are significantly adverse, cannot be mitigated, therefore unacceptable, the permits can and should be denied.

Response O59-4

Comment acknowledged.

O60, Washington Environmental Council, Rebecca Ponzio

Comment O60-1

November 30, 2015

Submitted via website and hand delivery

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RE: Westway/Imperium Draft Environmental Impact Statements

Dear Mr. Shay and Ms. Toteff:

Thank you for the opportunity to comment on the Draft Environmental Impact Statements ("DEISs") for the Westway and Imperium crude oil-by-rail terminal proposals. On August 31, 2015, the City of Hoquiam and Washington Department of Ecology issued the DEISs as prepared under the State Environmental Policy Act ("SEPA"). The following comments are on both the Imperium and Westway DEISs and are submitted on behalf of the signed organizations below.

These comments expressly incorporate the comments, including expert reports and other supporting materials, submitted by the Quinault Indian Nation on November 24, 2015. We also incorporate by reference comments by the Friends of Grays Harbor and Grays Harbor Audubon.

Fundamentally, the DEISs find significant adverse impacts that cannot be mitigated. These impacts include oil spills to ground, surface and marine waters, impacts to the aesthetics, recreation, cultural resources, tribal treaty-protected resources, and human health, and the potential for fire and explosion. The DEISs state that, "no mitigation measures can be implemented that will completely eliminate the adverse consequences of a large spill."

Although there are many concerns with the adequacy of the threats analysis described in the DEISs of the Westway and Imperium terminal proposals, it is undeniably clear, even from the limitations of the information presented, that these projects are too risky and should be denied.

Response O60-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment O60-2

Specific additional comments on the DEISs include:

- Risks to Our Waterways:
    - Oil tanker and barge traffic in Grays Harbor: The DEISs find that the increased marine vessel traffic from these terminals would increase the risk of a collision and oil spill into Grays Harbor. Even a small oil spill into Grays Harbor would harm fish and wildlife, commercial, tribal, and recreational fishing, and tourism. While the DEISs indicate that the impacts of increased vessel traffic in Grays Harbor can be mitigated via tug escorts and vessel

management, much of that claimted mitigation and its effectiveness is unsupported. At the same time, the DEISs indicate that there is no way to mitigate a large spill related to vessel traffic. The final EISs need to take into account and re-evaluate the risk of vessel traffic in Grays Harbor and the potential for oil spills and accidents – large, medium, and small. In particular, greater attention needs to be given to the narrowness of the shipping channels as well as the congestion associated with ships queuing at the terminals.

- Oil tanker and barge traffic outside Grays Harbor: The DEISs do not address the increased tanker and barge traffic along the outer coast, into the Puget Sound, down into California, or out into the open ocean to foreign markets if Canadian crude oil is received and/or the crude oil export ban is lifted. It is critical to note that many of the ships calling on the terminals would need to bunker and that these heavy fuels would come from Puget Sound refineries. These are significant gaps in the DEISs' analysis; these gaps need to be addressed in revised DEISs or in final EISs. Increased traffic from these terminals will also directly impact the fishing industry, and harm the fish and wildlife that use these waterways for rearing and feeding during critical times along migrations. These impacts in turn effect the ecology and human use of Grays Harbor and beyond.
- Chehalis River and Grays Harbor: The DEISs identify a suite of water resources throughout the Chehalis basin and Grays Harbor area – from wetlands to floodplains to groundwater to the rivers and channels of the watershed. All of these water resources are at risk of oil spills and accidents with these proposals. The DEISs state that, "no mitigation measures would completely eliminate the possibility of a large spill or explosion, nor would they completely eliminate the adverse consequences of a large spill or explosion." In addition to the potential for a large spill or explosion, the fresh and marine water resources throughout the study area, and beyond, are at risk of spills and accidents. The DEISs fail to adequately address these risks and the level of impacts that these small and medium spills and accidents would have on water resources.

- Preventing Oil Spills and Accidents:
  - Analysis of the likelihood of an oil spill: The analysis of an oil spill in terms of the transport of oil by train, the storage of oil at the project sites, and the transport of oil via vessel is inadequate and has numerous flaws.
    - Oil spills from trains: The analysis around a train oil spill in what could be a minor, a medium, or an extreme event is confusing and implies the risk is low. This doesn't take into account the decrepit state of the rail tracks, the fact that derailments occur with frequency along that line, the inadequate federal regulations on oil tank car safety standards, and that across North America there has been a growing trend of more oil train derailments.
    - Oil spills at the site: The analysis finds that while an oil spill at the terminal site was unlikely, such a spill would have significant impacts that could not be mitigated.
    - Oil spills from vessels: The information on oil spills from marine vessels is presented in a vague and confusing way, including the presentation of information on "risk sliders," maps with no true indication of oil spill size or extent, and spill probabilities presented separately for different kinds of spills, with no presentation of overall risks. Even using the DEISs' questionable calculations, the expected frequency of any type of oil spill of 2,100 gallons or more impacting the marine environment is one spill every 2.2 years.

This is a staggering risk that is hidden by its presentation in the DEISs. The adequacy of oil spill risk mitigation measures are not substantiated.

  - Geologically unstable terrain: The DEISs describe the geologically unstable terrain along the rail route as well as the vulnerable area where the projects themselves are located, including landslides, earthquakes, and sitting within a tsunami zone. The DEISs indicate that there would be unavoidable and significantly adverse impacts should a tsunami occur within the project's locations. There is not a mitigation tool available to prevent this type of catastrophic event and the resulting impacts to fish, wildlife, and human life caused by the resulting oil spills, potential fires, and explosions.

- Responding to Oil spills and Accidents: Oil spills and accidents are a major risk of the proposals both spills on site and during transit. The DEISs speak to these risks in multiple ways but do not adequately address the level of risk nor incorporate strong preventative measures to reduce these risks. For example:
  - Oil Spill Financial Responsibility: The DEISs indicate that financial responsibility for potential costs of the response and clean up of oil spills, natural resource damages, and the costs to state and affected counties and cities for their response actions would be required after the projects are allowed to be built but before they can operate. This step should occur prior to starting construction in order to ensure it is done appropriately and with enough time to address the complexities of the issue. There needs to be clarity as to when the facility or rail line has to assume the liability associated with an accident prior to any construction or other further action towards the projects.
  - Oil Train Insurance: The DEISs lack any information on the level of insurance required to address an oil spill or accident. This omission should be remedied in the final EISs.
  - Response capacity: The DEISs primarily rely on improving response time of an oil spill by putting the burden of response on others (e.g. the Chehalis Tribe, Quinault Indian Nation, local governments) and conducting limited training. This reliance on others to shoulder the burden of an oil spill due to the projects is inadequate and puts the entire region at risk.

Response O60-2

The approach to the analysis of risks in the study area is to consider different spill scenarios that could occur related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, a spill could occur at any location and at any time. Spill scenarios were chosen based on assumptions about terminal, rail, and vessel operations (as discussed in the Master Response for the Risk Assessment Methods) and locations where spills could occur more frequently, based on expert opinion, or result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, the discussion of impacts presented in Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4 have been removed in the Final EIS.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Chapter 4, *Environmental Health and Safety*, identifies other measures to ensure that broader prevention, preparedness, and response planning involves the appropriate stakeholders and that updates to any plans applicable to reducing risks related to the proposed action contain appropriate applicant information and participation. To the extent possible, as outlined in the Master Response for Mitigation Framework, measures that address the need for more coordinated and focused planning clarify the role of the applicant as appropriate. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7 describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment O60-3

- Assumptions and Analysis of Crude Oil: The DEISs primarily focus on the projects transporting and storing crude oil from the Bakken region. Yet both projects state that they may store and ship Alberta tar sands as well. The final EISs should incorporate a more thorough analysis of the impacts, risks, threats, and mitigation measures associated with both types of crude oil which act very differently in water and during an accident. It is important to recognize that oil from the Alberta region is not subject to the crude oil export ban and that the behavior of the various forms of dilbit has been studied using Cold Lake crude which is far lighted than that from the Athabasca region which is the primary source of crude from Alberta.

Response O60-3

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for

Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

Comment O60-4

- Export of Crude Oil: The DEISs fail to adequately evaluate the impact of bringing in Canadian crude oil into the projects and the potential to export this crude oil. Additionally, the DEISs fail to adequately address the potential to lift the existing ban on exporting domestic crude oil, such as from the Bakken region, and the impact this would have on increasing the volume of crude oil traveling through the Grays Harbor region.

Response O60-4

Based on the crude market analysis conducted for this Final EIS, crude oil handled at the proposed facility would likely be transported to West Coast refineries despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment O60-5

- Rail Transportation of Oil: The rail tracks heading from Chehalis into Grays Harbor are old and in need of various repairs. The additional burden of extremely heavy, long crude oil trains and the potential for spills, accidents, delays, and additional impacts are not adequately addressed in the DEISs.
    - Increased delays at railroad crossings: The DEISs find that these projects would block car traffic at railroad crossing intersections along the rail route and that there would be "substantial increases" in vehicle delays between East Aberdeen and the project, including at the Olympic Gateway Plaza. Emergency vehicle access could also be delayed.
    - Rail condition: The DEISs find that the railway infrastructure itself is in poor condition and assumes a 20-year schedule for upgrading the tracks but these upgrades are not funded or programmed for implementation. That leaves the analysis in the DEISs very weak regarding the likelihood of an accident or spill along the rail route, congestion along the rail, impact to other products, etc. The final EISs must update the analysis and base the risks and impacts on actual current conditions or realistic future scenarios.
    - Impacts to communities: The level of train traffic and how this traffic would impact the communities all along the rail route are not adequately analyzed in the DEISs. Furthermore, the DEISs find that noise is a significant public health impact that cannot be mitigated.

Response O60-5

Any future rail maintenance would be determined based on applicable regulatory requirements, future rail traffic volumes, and PS&P's rail customer needs.

Regarding noise impacts, Draft EIS Chapter 3, Section 3.7, *Noise*, identifies a proposed mitigation measure for the applicant to support local communities in applying for quiet zones at crossings where severe impacts from increased train horn soundings were identified. Where implemented,

quiet zones would eliminate impacts. The EIS acknowledges that where quiet zones were not implemented at these crossings, the potential for severe impacts would remain.

Comment O60-6

- Respecting Tribal Treaty Rights, Treaty-Trust Obligations, and Tribal Culture. The Quinault and Chehalis peoples have lived in this area since time immemorial. The Quinault Indian Nation has a treaty with the U.S. government to fish and gather in Grays Harbor, and the DEIS finds that there is a risk that those treaty-protected resources would be harmed if the projects move forward. Moreover, the Quinault Indian Nation is a large economic provider in Grays Harbor County. Outside the specific tribal lands and usual and accustomed fishing and hunting areas of the Quinault Indian Nation and the Chehalis people, tribal treaty lands and tribal culture all along the rail route – from the Columbia River and beyond - will be impacted by the potential of oil spills, rail congestion, air pollution, and accidents, yet impacts to these tribal nations were not reviewed. The final EISs should include these impacts in its analysis.

Response O60-6

Impacts on tribal resources within the study area are addressed in Chapter 3, Section 3.12, *Tribal Resources,* and Chapter 4, Section 4.7, *Impacts on Resources*. For the reasons discussed in the Master Response for Geographic Scope of the EIS, the analysis of impacts in the extended study area is qualitative but acknowledges the potential for increased risks. As noted, these consequences are generally anticipated to be similar to the types of impacts presented in Final EIS Chapter 4, Section 4.7, which includes potential impacts on tribal resources. Because the impacts are described in general terms, they are also applicable to the extended study area although Final Chapter 5, *Extended Rail and Vessel Transport*, acknowledges that considerations unique to the extended study area could influence the potential impacts.

Comment O60-7

- Geographic and Temporal Scope of Review: The DEISs are extremely limited in their scope of evaluation and in some cases inconsistent with regard to what is considered the project area. Impacts of these projects will be felt on communities and natural resources all along the rail route—from the origin of the crude oil to Hoquiam—as well as the entire length of the vessel route. The final EISs should increase its scale of evaluation in order to more comprehensively identify the risks of the projects. Additionally, the DEIS uses a 20-year period to analyze impacts, but review of the projects full lifetime is required. A longer period of review will allow for a more comprehensive analysis of the projects' risks and impacts.

Response O60-7

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

Final EIS Chapter 3, Section 3.0, *Introduction*, clarifies that the analysis considers the potential for impacts over the lifetime of the proposed facilities. For impacts that are evaluated quantitatively, the analysis considers the potential for impacts in 2017— the anticipated first year of operation—and in

2037 to account for future growth and development. This approach provides context to decision-makers about how the impacts of operations would evolve over a reasonably foreseeable period. This is particularly relevant for transportation- and risk- related impacts, which can evolve over time because of reasonably foreseeable increased growth, planned infrastructure changes, and phased regulatory requirements for improved transportation efficiency and safety.

Comment O60-8

- Human Health: The impacts on human health, including air quality, as well as risk and fear of accidents and oil spills from the transport of the crude oil alongside schools, hospitals, health care facilities, and homes are not adequately described or analyzed. Additionally, the human health impacts to the community surrounding the projects—including an increase in volatile compounds, oil spills, and accidents—is inadequately addressed in the DEISs.

Response O60-8

The commenter does not specify what is inadequate about the Draft EIS analysis. Draft EIS Chapter 3, Section 3.2.5.2, *Proposed Action*, presents a detailed analysis of potential impacts related to air pollutant emissions under the proposed action. The Final EIS section has been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated emissions are lower than those presented in the Draft EIS. Potential impacts on human health from oil spills, fires, or explosions are discussed in Draft EIS Chapter 4, Section 4.7.1.7, *Human Health*, and Section 4.7.2.3, *Human Health*. Final EIS sections have been revised to more fully describe potential human health impacts

Comment O60-9

- Climate Impacts: The DEISs do not adequately analyze the impacts of the projects on climate change, including contribution of greenhouse gas emissions and ocean acidification. In order to have any chance to stave off catastrophic climate disruption, we must start transitioning away from fossil fuels and towards clean energy. The DEISs discuss the direct emissions from the rail-transportation part of these projects (although only from Washington's eastern border to Hoquiam), and finds a 2.6% increase in greenhouse gas emissions from rail in Washington—over 30,000 metric tons of carbon dioxide equivalent each year.
    - Study Area: The greenhouse gas emissions analysis is limited to Washington state and does not include transportation from the actual drill sites or full transportation to the final refining end-point.
    - Link between greenhouse gas emissions and terminal proposals: The DEISs should incorporate the findings of a recently released report by Sightline and Oil Change International on the impact of the terminal proposals in the Pacific Northwest on greenhouse gas emissions. [Footnote 1: Tracking Emissions: The Climate Impact of the Proposed Crude-by-Rail terminals in the Pacific Northwest. Sightline Institute and Oil Change International. http://www.sightline.org/research_item/trackingemissions/]
    - Lack of cumulative analysis: The DEISs improperly limit its cumulative effects on climate change analysis to the Grays Harbor terminals, even though federal agencies, like the U.S. Fish and Wildlife Service, have called on Ecology and Hoquiam to review the cumulative impacts of all oil and coal shipping terminals proposed for Washington ports.

Response O60-9

In responses to comments, the Final EIS reflects the expansion of emission estimates to include those from offsite transport from the likely source of crude oil to the furthest likely refinery destination, based on a crude oil market analysis conducted for this Final EIS and summarized in Final EIS Chapter 5, *Extended Rail and Vessel Transport*. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. Refer to the Master Response for Geographic Scope of the EIS and the Master Response for Connected or Similar Actions for a discussion of the geographic and cumulative scope of the EIS.

Comment O60-10

- Impacts to Wildlife:
  - Shorebirds and the National Wildlife Preserve: The Grays Harbor NWR is an aquatic Resource of National Importance, provides irreplaceable biological and ecosystem services, and affords important opportunities for wildlife-oriented recreation, education, and research. These crude-by-rail proposals would pose unacceptable risks to fish and wildlife. The possibility of a future oil spill, and the potential for resulting impacts, must be thoroughly analyzed and addressed.
  - Threatened and endangered species. Several species that are protected under the Endangered Species Act could be harmed by these projects, including bull trout, marbled murrelets, snowy plovers, and streaked horned larks. The U.S. Fish and Wildlife Service has stated that "redevelopment proposals bringing crude-by-rail to properties managed by the Port, including but not limited to the current Grays Harbor Rail Terminal proposal, would pose unacceptable risks to fish and wildlife trust resources managed and co-managed by the service. Proposals bringing crude-by-rail to properties managed by the Port would present a corresponding, inherently higher cumulative risk over time of significant hazardous material releases to the terrestrial and aquatic environments." [Footnote 2: USFWS Scoping Letter. Grays Harbor Rail Terminal EIS. October 30, 2014 (reference number: 01EWFW00-2015-CPA-0001]

Response O60-10

Comment acknowledged.

Comment O60-11

- Economic Impacts: Overall, the DEISs lack a comprehensive analysis of the projects on the economy of Grays Harbor. This is a critical omission of the analysis and must be addressed in the final EISs. For example:
  - Impacts on commercial fishing: The DEISs admit that commercial fishing could be affected by the increased oil tanker and barge traffic, but do not adequately value these impacts. Local jobs and long-standing ways of life are at stake. This applies to both directly within the Grays Harbor region that is so economically dependent on fishing and also in the greater coast fisheries that would be impacted by these terminals.
  - Impacts to Grays Harbor County: The DEISs state that the proposals would add 30.2 FTEs yet there is only limited mention of how these proposals would harm or reduce overall

employment in Grays Harbor, at least 31% of which is dependent upon health marine resource jobs (a figure which excludes tribal contributions).

Response O60-11

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment O60-12

To meet the requirements of SEPA, the EISs must contain sufficient information to support their conclusions, disclose gaps and uncertainties, and include reasonably available known information. An adequate EIS gives decision makers tools to allow a reasoned decision.

These DEISs must be revised, as they fail to meet the basic requirements of the law. Once corrected, the DEISs' conclusions that these projects present significant, adverse environmental and public health harms and risks that cannot be mitigated will be even stronger, giving Ecology and the City of Hoquiam a more complete picture of the dangers posed by these projects and the reasons why they must be rejected.

Sincerely,

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Response O60-12

Refer to responses to detailed comments above.

O61, Washington Physicians for Social Responsibility, Bruce Amundson

Comment O61-1

My name is Bruce Anderson. I'm a physician and president of Washington Physicians for Social Responsibility, an organization with 725 health professionals in Washington. I want you to recognize the risk of a tsunami and earthquake in the Cascadia Subduction Zone.

In my recent discussion with Dr. Chris Goldfinger, a paleoseismologist at Oregon State University who's been investigating earthquake potential in this subduction zone, he reports the following: The most recent analysis showed the probability of a major subduction quake between 10 and 17 percent within the next 50 years. This is significantly higher probability than the six to 12 percent or eight or greater earthquake stated in the two EISs.

Response O61-1

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

Comment O61-2

Researchers report the subduction earthquake can generate a tsunami across the Northwest to reach between 22 and 33 feet, also significantly greater than between six to 21 feet listed in the EIS.

What is the significance of this? Twenty-five years ago we didn't know this about the tectonic fault. We built our cities. Fifty years in the life of one city is less than one lifespan, but a ten to 17 percent probability of a monster tsunami within 50 years represents a very high probability.

The only preventative is to avoid adding to the potential damage from tsunami. It is a great responsibility within this zone of destruction, especially in facilities which hold toxic, flammable, and explosive substances.

Response O61-2

Draft EIS Chapter 3, Section 3.1.4.3, *Geologic Hazards, Tsunamis*, identifies predicted waves heights of 23 to 33 feet as they approach the shoreline of the project site. The wave heights translate to inundation depths as the waves come ashore. The predicted inundation depths would range from 21

to 26 feet above the ground surface in various locations across the project area. The depths as presented in the Draft EIS consider coseismic subsidence and sea level rise.

Comment O61-3

This is my question. How would the companies mitigate the impact of a tsunami of this magnitude?

To conclude, I don't believe these risks are mitigable. As a physician I would want the residents to be protected from the serious health impacts of tsunami hazards. The most important role of the local government in the State of Washington is to protect the safety of its citizens. The construction of these facilities is inconsistent with its responsibility, so these permits must be denied.

Response O61-3

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

O62, Washington Physicians for Social Responsibility, Bruce Amundson

Comment O62-1

October 8, 2015

To: City of Hoquiam
Washington State Department of Ecology

Re: Westway and Imperium DEIS Proposals

My name is Bruce Amundson. I am a physician and the President of Washington Physicians for Social Responsibility, an organization of 725 health professionals.

It's widely recognized that our region is at risk of tsunamis from earthquakes at the Cascadia Subduction Zone. In my recent discussions with Dr. Chris Goldfinger, a paleo-seismologist at Oregon State University and an international expert who has been investigating the earthquake potential of this subduction zone, he reports the following: their most recent analysis shows a probability range of a major subduction earthquake of 10-17% at the site within the next 50 years.

First, this is a significantly higher probability than the 6-12% for an 8 or greater magnitude earthquake stated in the EIS.

Response O62-1

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

Comment O62-2

Researchers report that such an earthquake would generate a tsunami for the Grays Harbor area of between 22 and 33 feet, also significantly greater than the 6-21 feet in the text of the EIS. Dr. Goldfinger observes that the lower end of their range is likely not scientifically correct.

What's the significance of all this. 25 years ago we didn't even know about the existence of this tectonic fault. We built our cities and structures at sea level.

Now we know differently. 50 years in the life of a city is less than one lifespan. But a one-in-four or on-in-five probability of a monstrous tsunami occurring within 50 years represents a VERY high probability.

So while we can't alter the probability of such an event, we can avoid adding to the potential damage from a tsunami 20-30 feet high or even much higher: we must stop building facilities within this zone of destruction, especially facilities that house toxic, flammable and explosive substances. This simply adds another serious, but preventable, element of harm to local residents.

So here is my primary question for this hearing: how would the companies mitigate the impacts of a tsunami of the magnitude described above and that has a significant probability of occurring within the next 50 years?

To conclude: I don't believe these risks are mitigatable. As a physician, I don't believe the residents can be protected from the serious health impacts that crude oil would add to the other tsunami hazards.

The singularly most important role of both a local government and the State of Washington is to protect the health and safety of its residents. The construction of these two proposed facilities is completely inconsistent with this responsibility, so the permits must be denied.

Bruce Amundson, M.D.

Response O62-2

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

O63, Washington Physicians for Social Responsibility, Laura Skelton

Comment O63-1

I am writing on behalf of Washington Physicians for Social Responsibility. We are a statewide organization of over 725 physicians, nurses and other health professionals committed to creating a healthy, peaceful and sustainable world. We reviewed a variety of health risks associated with crude oil transport and storage in the region—based on peer-reviewed medical research—and

summarized them in the attached document ("Oil Transport & Storage Position Statement from Concerned Washington & Oregon Health Care Professionals"), signed in support by 320 concerned health care professionals. Our conclusion is that the known risks associated with crude-by-rail transport and storage pose an unacceptable risk to human health and safety. Other health professionals are also concerned. The Washington State Medical Association recently passed a resolution expressing their members' concerns about oil transport and storage. WSMA Resolution C-8 resolves "that WSMA support legislation that works to prevent or minimize potential deleterious health effects related to transportation of coal and oil by train through Washington State; and that the WSMA will submit comments expressing health and safety concerns in those public processes related to proposals for coal and oil terminals and related infrastructure in our state." The level of threat to human health and safety posed by the Westway and Imperium proposals is unacceptable, and the DEIS documents provide no evidence that mitigation measures will be sufficient to protect public health and safety. Because the health and safety of our communities is paramount, we request that you deny permits necessary for these terminals to handle and store crude oil. Our review of the draft EIS documents revealed the following unavoidable and immitigable risks to human health and safety. We provide further explanation of these risks in the attached document, "Imperium and Westway DEIS: Analysis of Impacts on Health." 1. Tsunami overtopping of tanks 2. Air pollution from locomotive engines and terminal operations 3. Fires triggered by terminal accidents and train derailments 4. Oil spills that threaten drinking water and primary food sources 5. Vehicle traffic delays, including emergency response vehicles 6. Noise from trains 7. Climate change Thank you for the opportunity to submit these comments. We urge you to reject the proposed Westway and Imperium oil terminals on the basis of their overwhelming risk to public health and safety.

Response O63-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action. Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe potential human health impacts that could result from an oil spill, fire, or explosion. Refer to responses to detailed comments below.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Comment O63-2

Washington Physicians for Social Responsibility

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Imperium and Westway DEIS: Analysis of Impacts on Health

Tsunami overtopping of tanks:

The oil tanks are at risk of being dislodged, spilling their contents, and potentially even catching fire due to a tsunami triggered by an earthquake along the Cascadia subduction zone. Despite well-publicized research from OSU professor Chris Goldfinger et al. suggesting that a major earthquake at the Cascadia subduction zone has a 30% chance of occurring within the next 50 years—and modeling from WA State Department of Natural Resources indicates that Hoquiam and Aberdeen

are in a tsunami inundation zone—the DEIS states, "current design standards do not require consideration of tsunami risks."

How would the applicants propose to mitigate the impact of tsunami waves of 20 to 100 feet in the event of an above-described major subduction earthquake? Though applicants indicate plans to install tank pilings up to a depth of 150 feet, bedrock in the area begins at 200 feet.

Response O63-2

Draft EIS Chapter 3, Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards*, describes potential impacts related to earthquakes and earthquake-related effects (e.g., liquefaction, tsunamis) and the existing requirements that would reduce these potential impacts. Chapter 3, Section 3.1.7.1, *Applicant Mitigation*, identifies measures that would further reduce these potential impacts. Refer to the Master Response for Seismic Risk and Design Requirements. According to the investigations completed at the project site, the majority of the site consists of gravel to about 40 feet below the surface underlain by loose to dense sandy gravel to a depth of about 130 feet below the surface. Figure 8 of the Hart Crowser report (2013; referenced in Section 3.1, *Earth*), indicates competent soil is generally reached at 150 feet below-ground surface.

Comment O63-3

Air pollution from locomotive engines and terminal operations:

The DEIS states, "Increased rail traffic would almost double emissions of criteria pollutants associated with rail transport in county." Onsite operations at the terminals would release toxic pollutants, including diesel particulate matter (DPM), benzene, formaldehyde and toluene. Train engines also release DPM, which is estimated to be highest along the PS&P rail line. As noted in the DEIS, "There are no local or state regulations for DPM emissions from mobile sources."

According to DEIS documents, risk of DPM inhalation increases at least 10-fold at project sites, putting workers especially at risk. DPM and other pollutants associated with these projects increase risk of cancers, including breast and lung cancer; are associated with lower infant birth weight and increase risk of respiratory death; contribute to impaired pulmonary development for infants and children; increase the risk of asthma diagnosis, exacerbation and related hospitalizations; contribute to neurodevelopmental disorders in children; and increase risks of acute and chronic obstructive lung disease, heart attack, stroke, systemic inflammation, and overall risk of disease and mortality.

Response O63-3

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant. The Final EIS also reflects lower onsite emissions of criteria air pollutants from mobile sources.

To provide perspective, the most recent U.S. Environmental Protection Agency (EPA) National Air Toxic Assessment based on 2011 air emissions has the statewide average air toxic cancer risk at 43 per million and Grays Harbor County at 20 per million. However, EPA excludes diesel particulate

matter from cancer risk analysis because there is too much uncertainty about the cancer potency value to assign a numerical value for diesel particulate matter. If diesel particulate matter is responsible for cancer risk similar to that found in Puget Sound by the Puget Sound Clean Air Agency and contributes 78% of the additional cancer risk, then a one-in-a-million increase from the proposed action would represent about a 1% increase over current air toxic risk levels. In addition, non-cancer chronic exposures are assessed based on a reference exposure level, which for diesel particulate matter is 5.0 micrograms per cubic meter. A chronic hazard index is calculated by dividing the annual average concentration of a toxic pollutant by the chronic reference exposure level for that pollutant. The reference exposure level is a level at or below which no adverse health effects are anticipated following long-term exposure. Thus, if the chronic hazard index is less than 1.0, the pollutant is not considered to pose a significant risk or adverse non-cancer health effects. The chronic hazard index for the nearest resident is 0.0007 and therefore does not represent a substantial risk. To date, EPA and the Office of Environmental Health Hazard Assessment have not found sufficient evidence to fully understand the mechanism of exposure and clear dose-response relationships for these acute responses, and have precluded development of recommendations about levels of exposure that would be protective.

Comment O63-4

Fires triggered by terminal accidents and train derailments:

There is a risk of fires at the terminals. Considering that oil trains and terminals would be located within a population center, this puts many residents at risk from inhalation of smoke and particulate matter.

As we explain in an attached document ("WPSR Policy Position Opposing the Siting of Crude Oil Terminals within Population Centers"), major fires and explosions have occurred at other petroleum terminals. The magnitude of a fire ignited by the massive volume of crude oil to be stored at the Westway and Imperium terminals would present imminent danger of burns and even death for the workers at the facilities and anyone within a half mile.

Another major health concern is the air pollution that would result from a crude oil fire. An explosive event at an oil terminal in England in 2005 resulted in fires that burned for 5 days and a plume of smoke that could be seen 70 miles away. Smoke inhalation of the dense, heavy, suffocating type experienced in crude oil fires is a serious public health risk and cannot be eliminated as a risk for much of the Grays Harbor population.

Response O63-4

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Comment O63-5

Oil spills:

Considering that human error was to blame for 30% of the 1,193 spills that happened on the West Coast in 2014, the DEIS's claim that a medium pipeline or storage tank spill is predicted to occur once in 1,100 years and a large spill once every 22,000 years greatly underestimates the probability of an accidental spill—whether at the port or during a vessel accident.

The DEIS also suggests that medium to large spills during rail transport are moderately to highly likely, and will have a moderate to severe impact. Health impacts of oil spills over both land and water increase risk of neurotoxicity, cancer, lung disease, loss of cognitive function, and endocrine disruption in humans.

An oil spill off the coast could contaminate primary sources of seafood for residents. Toxins, including polycyclic aromatic hydrocarbons (PAHs), accumulate in seafood after an oil spill, presenting increased risk to humans who eat the seafood.

Oil spilled during a train derailment threatens drinking water sources near rail lines. If oil spills from a train in the Chehalis River Valley, wells in the area are at risk of groundwater contamination. The BNSF rail lines run adjacent to and upstream from Olympia's drinking water source, putting their drinking water at risk from train derailments and spills. Spokane relies on a sole-source aquifer, putting drinking water for over half of Spokane at risk.

Response O63-5

The approach to the risk analysis involves assessing the chance of various release scenarios related to terminal (onsite) operations and rail and vessel transport to and from the project site to provide information about the range of risks relevant to the proposed action. Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts on resources. Final EIS Section 4.7 has been revised to more fully describe the human health impacts that could result from an oil spill, fire, or explosion. For more information on the assumptions, methods, and sources of data used in the risk assessment, refer to the Master Response for Environmental Health and Safety Analysis.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

Comment O63-6

Vehicle traffic delays:

Long delays at rail crossings present major and immitigable consequences for emergency services. According to the DEIS, Olympic Gateway Plaza in Aberdeen is likely to be the at-grade crossing most impacted by delays from trains. Complete blockage to and from the complex will occur. Considering that expected delays will typically be 35 minutes per train several times a day, this will dramatically

affect an EMS system where outcomes are dependent on response times of less than 10 minutes. These delays could be a matter of life and death in the event of cardiac arrest, heart attack, stroke or major trauma.

DEIS documents suggest that three possible interventions explored for mitigating delays are not feasible. Also, these delays are not only a concern for the Grays Harbor area. Permitting these terminals will impact emergency services in other communities along the rail corridor.

Response O63-6

Final EIS Chapter 3, Section 3.16.8, *Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?* clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).

Comment O63-7

Noise from trains:

Noise from trains, especially from the sounding of horns at crossings, presents a particular challenge to health. Trains horns are sounded at a range known to disturb sleep and to trigger health and mental health issues. Increased cardiovascular events including myocardial infarction and arrhythmia are associated with nighttime noise and noise greater than 90 decibels (in the range of train horns). Children exposed to noise have exhibited adverse cognitive performance and increased psychiatric illness.

Trying to mitigate for increased train noise presents a no-win situation. The only mitigation measure suggested in the DEIS is quiet zones. These are very expensive, and essentially substitute one problem for another. A quiet train that does not sound a horn puts people at risk of collisions and serious accidents.

Response O63-7

Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*, presents an analysis of noise impacts including noise from trains related to the proposed action. The analysis uses the Federal Railroad Administration (FRA) adopted noise assessment methods developed by the Federal Transit Administration (FTA). Per these methods, noise-sensitive land uses are identified within approximately 500 feet of the PS&P rail line for wayside noise and within 1,000 feet of grade crossings for train horn noise.

As noted in Section 3.7.6.2, *Proposed Action*, the loudest hour (measured in Leq) at grade crossings and wayside locations under the proposed action would result from a single train passby, which occurs under existing conditions. This means the maximum hourly noise levels would not change. Because freight rail traffic does not run on a schedule, the analysis assumes rail events related to the proposed action are evenly distributed over a 24-hour day. No moderate or severe impacts on sensitive receptors were identified for train wayside noise. The analysis identified moderate and severe noise impacts at residential receptors adjacent to grade crossings, due to the increase in horn noise events related to the proposed action over a 24-hour day.

The FRA/FTA criteria are based on a 24-hour average sound level that is weighted for events that occur at night. While the addition of approximately one train pass per day on average under the proposed action would increase the average daily noise level from horn soundings at rail crossings, and in some cases result in the impacts described above, the actual horn noise associated with any given train passage would not increase under the proposed action.

Implementation of a quiet zone is subject to FRA approval and requires measures to maintain the level of safety while reducing noise.

Comment O63-8

Climate change:

Climate change presents the largest public health challenge of this century. The proposed oil terminals would release greenhouse gas emissions that directly contribute to climate change. According to DEIS calculations, these two terminals would collectively result in annual release of approximately 74,000 metric tons of CO2. They would also facilitate further emissions from the end-use of the crude oil, as it releases greenhouse gases upon combustion.

Climate change in our region is anticipated to result in increased heat-related illness, potency of allergies, health care costs, and extreme weather events. Expanded ranges of disease vectors are expected to result in increased spread of infectious diseases. Low income and communities of color are anticipated to be disproportionately impacted.

Response O63-8

Comment acknowledged.

O64, Washington Physicians for Social Responsibility, Laura Skelton

Comment O64-1

October 8, 2015

To: City of Hoquiam
Washington State Department of Ecology

Re: Westway and Imperium Terminal Services Expansion Projects EISs

My name is Laura Skelton. I'm the executive director of Washington Physicians for Social Responsibility.

Newer earthquake predictions suggest a much higher probability of an earthquake followed by tsunami in the Cascadia subduction zone than what DEIS documents suggest. The 15-year-old earthquake probability data cited in the documents is no longer the best available science.

The DEIS documents talk very little about what an earthquake and tsunami might do to the terminals themselves, and the health and safety consequences that would likely ensue.

The proposed construction of the tanks appears to make them particularly susceptible to damage from a tsunami of the size predicted for Grays Harbor. For example, applicants plan to install tank

pilings to a depth of 150 feet, !t !s acknowledged that the soft soils in Grays Harbor are particularly susceptible to ground shaking, and we know that bedrock in the area does not begin until around 200 feet below ground.

In addition, the DEIS acknowledges that both imperium and Westway terminals would experience overtopping in the case of a tsunami, which means that waves will come over the protective berms and reach the tanks themselves.

What will a wall of water over 22 feet high do to the tanks? If those tanks are overturned, the stage is set for millions of gallons of toxic crude oil to spill onto both land and water. The likelihood that this flammable material would catch fire from downed electrical lines or from damaged generators or other equipment is a serious concern.

The magnitude of a fire ignited by the massive volume of crude oil we're talking about would present imminent danger of burns and even death for the workers at the facilities and anyone within a half mile. Another major health concern is the air pollution that would result from a crude oil fire. An explosive event at an oil terminal in England in 2005 resulted in fires that burned for 5 days and a plume of smoke that could be seen 70 miles away.

The level of threat these projects pose for human health and safety is unacceptable, and the DEIS documents provide no evidence that mitigation measures will be sufficient to protect human life in the case of a tsunami.

That is why permits for both Westway and Imperium must be denied.

Response O64-1

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

O65, Washington Physicians for Social Responsibility, Laura Skelton

Comment O65-1

My name is Laura Skeleton. I'm the Executive Director at Washington Physicians for Social Responsibility. Newer earthquake predictions suggesting much higher probability of earthquake followed by tsunami in the Cascadia Subduction Zone than what the DEIS document suggests.

The data cited in the document is no longer the best available science.

Response O65-1

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

Comment O65-2

The DEIS documents also have very little about what an earthquake and tsunami might do to the terminals themselves and the health and safety consequences that would likely ensue.

The proposed construction of the tanks appear to make them particularly susceptible to damage from tsunami of the size predicted in Grays Harbor.

For example, action plan resulting in pilings to a depth of 150 feet it. It is acknowledged that soft soils of Grays Harbor are extremely susceptible to ground shaking and bedrock in the area does not begin until around 600 feet below ground water.

In addition, the DEIS acknowledges both Imperium and Westway terminals would experience overtopping in the case of a tsunami, which means that waves will come over protective berms and reach the tanks themselves. What will a wall of water over 22 feet high do to the tanks? If those tanks are overturned, the stage is set for millions of gallons of toxic crude oil to spill onto land and water.

So likelihood of this flammable material to catch fire, downed electrical lines, or damage generators, or other equipment is a serious concern. The magnitude of a fire ignited by massive volume of crude oil we're talking about will present imminent danger for workers at the facility and anyone within a half mile.

Another major priority, air pollution that results from a crude oil fire. An explosion event at an oil terminal in England in 20also crude oil, resulted in fires that burned for five days and a plume of smoke that could be seen 70 miles away. The level of threat is unacceptable.

Response O65-2

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action, Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

O66, Washington State Office of National Audubon Society, Friends of Birds, Jen Syrowitz

Comment O66-1

Thank you, I appreciate that. Hi. My name is Jen Syrowitz, and I'm here on behalf of the Washington State Office of the National Audubon Society, Friends of Birds. And I'm here to speak on behalf of birds.

Who cares about birds? Well, aside from being beautiful and a natural part of our eco system, birds serve as sensitive indicators of the health of our planet, and I do not believe that their needs have been adequately assessed in this Grays Harbor Draft Environmental Impact Statement.

Grays Harbor is the designated site of hemispheric reportments to birds. This means that numbers have been reported, habitat has been documented as being of extreme importance to many different bird species and their survival.

For example, the Western Red Knot, who's numbers were approximately 22,000 birds in 2010 have taken quite a liking to the Grays Harbor estuary, using it almost exclusively as their migration stopover between South America and Alaska to feed on bicals. They have one of the longest migrations of all bird species.

The Washington Department of Fish and Wildlife recently released a report that shows the Red Knot uses the North Bay of Grays Harbor for nearly all of the month of May. This is only about six miles from the proposed terminal sites, which is adjacent to the Grays Harbor National Wildlife Refuge.

My bottom line to you today is that one spill or explosion could wipe out an entire species, or as you've heard an entire human community. Thank you for your time today.

Response O66-1

Draft EIS Chapter 3, Section 3.5, *Animals*, addresses potential impacts of construction and routine operation of the proposed action on animals, including birds such as red knots. Final EIS Chapter 3, Section 3.5, *Animals*, and Appendix F, *Special-Status Species*, have been revised to include all 25 Bird of Conservation Concern that could occur in the study area. Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

O67, Westway Terminal Company LLC

Comment O67-1

MARTEN LAW

Westway Terminal Company LLC's
Comments on Draft EIS 1

November 30, 2015

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

Dear City Administrator Shay and Regional Director Toteff:

The following comments are submitted on behalf of Westway Terminal Company LLC ("Westway"), which has reviewed the Draft Environmental Impact Statement ("DEIS") for expansion of Westway's bulk liquids storage facility in Hoquiam, Washington, and provides the following comments on the DEIS for consideration by the co-lead agencies.

General Observations

As described in the DEIS, Westway is proposing to expand its existing methanol distribution facility at Terminal 1 at the Port in Hoquiam to receive, store, and unload crude oil. The DEIS provides a thorough discussion of the proposed project and its potential impacts, as well as potential impacts associated with upstream and downstream rail and vessel traffic. Westway's proposed expansion project represents yet one node within the broader, continuously expanding network that transports domestic petroleum resources for domestic use.

The scope of Westway's expansion will depend on market demand, but the project is expected to move forward in two phases. The first phase of construction, which could start in 2016 and take up to one year, will include two bulk liquid storage tanks and facility upgrades, including new and modified rail spurs, rail-unloading equipment, vessel loading equipment, and pumps/pipelines connecting the storage tanks to loading and unloading areas. If Westway determines that sufficient demand exists to expand storage capacity at the facility, Westway will construct an additional three storage tanks (for a total of five) in a second phase lasting approximately ten months. Both phases could be constructed together, but they are more likely to occur over time. Full build-out would allow Westway to store up to 1 million barrels (42 million gallons) of crude oil.

Some have suggested that, due to the planned storage capacity of the five tanks or the mechanical capacity of other elements of the project, Westway's project must have a much higher potential annual throughput than Westway has projected and the DEIS has evaluated. These concerns not only are misplaced, but also reflect a basic misunderstanding of the nature of the services provided by any bulk storage terminal. A terminal is a node that connects two different forms of transportation, in this case rail and vessel. All terminals must have sufficient surge capacity to even out irregularities in the different modes of transportation that they serve, so that products may move as efficiently as possible in the stream of commerce. A terminal's ability to move products from one transportation mode to another, and to temporarily store products during that transition, is essential to avoiding what could otherwise be supply disruptions and cascading impacts stemming from rail or vessel delays. For this and other reasons, the potential throughput of any storage terminal is not amenable to a mechanical calculation. Rather, it is a function of market demand and the capabilities of the transportation network as a whole. Westway, based on its evaluation of the market for crude oil storage terminals and the capabilities of the local rail network, has estimated that the crude oil moved through its Grays Harbor terminal expansion could grow over time to about 18 million barrels a year. The DEIS appropriately based its analysis on that throughput level.

Response O67-1

Comment acknowledged.

Comment O67-2

The development of Westway's expansion project would significantly re-energize an historically vibrant port that has been underutilized over the past two decades—particularly since the 2008 financial downturn. However, outside the immediate vicinity of Grays Harbor, Westway's proposal is simply one project within the broader national effort to utilize domestic resources and reduce the reliance on foreign petroleum resources. According to the U.S. Energy Information Administration, U.S. extraction of crude oil is currently at its highest rate since the early 1970s. [Footnote: U.S. Energy Information Administration, Petroleum & Other Liquids, http://www.eia.gov/dnav/pet/pet_crd_crpdn_adc_mbbl_m.htm.] Last year, the U.S. became the largest oil producer in the world, overtaking Saudi Arabia and Russia. [Footnote: National Conference of State Legislatures, Transporting Crude Oil by Rail: State and Federal Action (Oct. 30, 2015), http://www.ncsl.org/research/energy/transporting-crude-oil-by-rail-state-andfederal-action.aspx.] Westway anticipates that its facility will receive crude oil extracted from the Bakken Formation in the Intermountain Region and Central United States. Given the existing prohibition on exporting crude oil, Westway expects that all of the Bakken oil that it receives will be distributed to U.S. refineries along the west coast, thereby keeping the entirety of the economy associated with this resource within the United States.

The Westway project is not big enough to materially reshape the domestic crude oil transportation network. As demonstrated by Chapter 5 of the DEIS, even within Washington State it simply expands upon the existing paths for transporting crude oil by rail. But the project nevertheless would further our national objectives of reducing reliance on imported oil. Despite increased domestic oil production, west coast refineries still import a substantial amount of oil from other countries. The volume of oil moved through the Westway terminal at full build-out would be a bit more than the combined imports to west coast refineries from Russia, Indonesia and Venezuela in 2014, or about the same amount as was imported from Angola that year, but less than half of what was imported from Iraq.

The movement of petroleum products by rail is not a new phenomenon in the United States, although it has increased significantly with the rise of U.S. crude oil production in areas that do not have established pipelines. [Footnote: Association of American Railroads, Moving Crude Oil by Rail (July 2014), http://energy.gov/sites/prod/files/2014/08/f18/chicago_qermeeting_gray_statement.pdf.] Originating carloads of crude oil on U.S. Class I railroads increased by a factor of forty between 2008 and 2013, and the rate has continued to rise (although lower crude oil prices may dampen that trend). [Footnote: Id. at 3.] According to the U.S. Energy Information Administration, rail shipments of crude oil averaged 808,000 barrels a day in 2013, and in 2014 were over 1 million barrels a day. [Footnote: Id. at 3.]

The Westway project also would not be the first rail terminal in the Northwest region to receive crude oil from the Bakken Formation. As detailed in DEIS Chapter 5, crude oil already is being shipped by rail to a terminal in Port Westward, Oregon and to terminals at BP, ConocoPhillips, Tesoro, and U.S. Oil refineries in Washington. Nor, as discussed in the DEIS, is Grays Harbor the only Northwest location where additional rail terminals have been proposed. Projects are currently

undergoing review at a port in Vancouver, Washington and at the existing Shell refinery in Anacortes, Washington.

The DEIS strikes an appropriate balance by providing a qualitative discussion of how the Westway project fits into this larger picture of existing and proposed transportation of crude oil by rail in the Northwest and across the country. Approval of Westway's project would not introduce new hazards to the rail network in Washington or the other states between here and North Dakota, or to the waters off the coast of Washington and the other western states. The DEIS correctly focuses on the potential impacts that are unique to the Westway project, occurring along the PS&P rail line and in Grays Harbor. Outside of that geographic area, the potential impacts that may be indirectly linked to the Westway project are no different from the impacts and risks that already exist today.

Response O67-2

Comment acknowledged.

Comment O67-3

Specific Comments

Westway's specific comments are not presented in priority order, but rather follow the organizational structure of the DEIS.

Chapter 2: Proposed Action and Alternatives

Chapter 2 correctly describes Westway's existing operations and its proposed project. The DEIS appropriately considers the two alternatives of approving Westway's proposed project or not doing so. While Westway may develop its project in two phases, it is appropriate for the DEIS to present the potential impacts from full build-out of both phases of the proposed project.

Response O67-3

Comment acknowledged.

Comment O67-4

Chapter 3: Affected Environment, Impacts and Mitigation

Earth

Soil stability and liquefaction risk

Section 3.1.5.2 (page 3.1-19) indicates that a Cascadia Subduction Zone ("CSZ") earthquake could cause 6 to 31 inches of settlement due to soil liquefaction and spreading. The section then notes that a site-specific geotechnical analysis was prepared for Westway's project in 2013. That geotechnical analysis included an engineering evaluation of potential soil liquefaction due to a major earthquake (based upon a one-in-2475-year event) and used that analysis to provide recommended specifications for pile footings to support the proposed oil storage tanks. That engineering analysis estimated that with the recommended pilesupported foundations, the storage tanks would only experience an inch of settlement, and half an inch of differential settlement, as a result of a major earthquake equivalent to a CSZ event.

The Final EIS should note that with proper foundation design, any soil liquefaction and spreading that might occur due to a major seismic event would not be expected to have a material impact on Westway's proposed crude oil storage tanks.

Response O67-4

Final EIS Chapter 3, Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* reflects clarification that the potential release of crude oil from the storage tanks as a result of damages from an earthquake and tsunami would be minimized with mitigation measures for design and construction of the proposed storage tanks. Section 3.1.8 also refers to Section 3.1.7.1, *Applicant Mitigation*, which itemizes measures including design and installation of pile supported foundations of adequate depth, based on geotechnical reports, to resist seismic forces and maintain stability if liquefaction, lateral spreading, and settlement of surface soils occurs.

Comment O67-5

Tsunami Risks

Currently, the United States does not have a national design standard for tsunami risks. To address that shortcoming, the American Society of Civil Engineers (ASCE) has been developing a new chapter for its Standards for Design Loads for Buildings and Other Structures to address tsunami risks. The new chapter will be included in the next update to ASCE design standards, ASCE7-16, which in turn will form the basis for the subsequent update to the international building code in 2018, IBC- 2018.

The co-leads have attempted to anticipate these developments by retaining a consultant to make an independent projection of the height of the tsunami that could strike Hoquiam following a CSZ event and to develop design criteria based upon that projection. The resulting tsunami projections far exceed the most recent projections made by the Washington Department of Natural Resources, as well as the projections likely to result from application of ASCE7-16, once it is finalized.

The Washington Department of Natural Resources has modeled the height of the tsunami likely to reach coastal Washington communities following a magnitude 9.1 CSZ quake centered off the coast of Washington, predicting that the series of waves that would hit Hoquiam, starting an hour after the quake, would range from 2 to 4 feet in height. [Footnote: Walsh, et al., Washington Division of Geology and Earth Resources, TSUNAMI HAZARD MAP OF THE SOUTHERN WASHINGTON COAST: Modeled Tsunami Inundation from a Cascadia Subduction Zone Earthquake (Oct. 2000).] This modeling has formed the basis for all of the State of Washington's current tsunami planning, including hazard analysis completed as recently as 2013. [Footnote: See Slaughter, et al., Washington Division of Geology and Earth Resources, Earthquake-Induced Landslide and Liquefaction Susceptibility and Initiation Potential Maps for Tsunami Inundation Zones in Aberdeen, Hoquiam, and Cosmopolis, Grays Harbor County, Washington, for a M9+ Cascadia Subduction Zone Event (Feb. 2013).] In sharp contrast, the DEIS premises its tsunami analysis on a projection that Hoquiam could be hit by a wave that is 23 to 33 feet high. [Footnote: DEIS at 3.1-16.] This projection results from overly conservative assumptions, including assumptions that go well beyond those likely to be required under ASCE7-16. The resulting design recommendations would hold the Westway project to the highest design standards ever applied on the West Coast, which also are more stringent than future projects are likely to be held to once the International Building Code incorporates tsunami design criteria in 2018.

Response O67-5

Draft EIS Chapter 3, Section 3.1, *Earth*, includes a discussion of the assumptions used in both the current state hazard mapping referred to in the comment and the project-specific tsunami risk modeling presented in the Draft EIS. As explained in Section 3.1, since the publication of the state's hazard mapping in 2000, recent tsunami events and advancements in the understanding and methods applied to tsunami modeling have provided for refinement of appropriate risk estimates. In the absence of regulations governing tsunami design criteria requirements, the co-lead agencies worked with the Washington State Department of Natural Resources and third-party consultants to develop appropriate risk scenarios for evaluating the potential impacts related to the proposed action. Development of the scenarios was done consistent with advancements and an improved understanding of analyzing tsunami risks as provided for by Appendix M of the International Building Code, which documents voluntary standards. The assessment of tsunami risks specific to the project site based on the updated tsunami model is presented in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis*.

Comment O67-6

While the co-leads have attempted to use SEPA to anticipate the development of generally applicable tsunami-based design criteria, the overly conservative assumptions that drive the analysis do not comport with SEPA's requirements. SEPA authorizes agencies to require mitigation of significant adverse environmental impacts and Ecology's regulations define "significant" as "a reasonable likelihood of more than a moderate adverse impact on environmental quality." [Footnote: WAC 197-11-794.] The DEIS bases its tsunami analysis on an earthquake with a magnitude that is projected to occur only once in 3,333 years (i.e., have a 0.03 percent chance of occurring in any given year) [Footnote: DEIS at 3.1-15 – 3.1-16], and then adds an additional "safety factor" to all of its calculations. [Footnote: DEIS Appx. C at 3. 12 DEIS Appx. C at 1.] These assumptions go well beyond any "reasonable likelihood" of occurrence.

Response O67-6

As noted in the response to the preceding comment, the risk scenarios evaluated in Appendix C, *Tsunami Impact Modeling and Analysis*, were developed in coordination with the Washington Department of Natural Resources and in consideration of other recent tsunami risk assessments along the West Coast.4 Although the assumptions used in the scenario are more conservative than the currently available mapping,5 they are not necessarily more conservative than the anticipated ASCE 7-16 guidance, as discussed further below, and were deemed to be appropriate planning standards to consider in the context of SEPA.

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[4] CHE 2013. *Jordan Cove LNG Facility Tsunami Hydrodynamic Modeling*. Technical Memorandum. September 26, 2013. Issued as Appendix H-3 in Preliminary Application for a Site Certificate for the South Dunes Power Plant, Coos County, Oregon. Submitted to Oregon Energy Facility Siting Council. Jordan Cove Energy Project, L.P., January 2014. Available: https://www.oregon.gov/energy/Siting/docs/SDP/pASC/SDP%20pASC%20Exhibit%20H.pdf

[5] Walsh, T. J., C. G. Curuthers, A. C. Heinitz, E. P. Meyers, A. M. Baptista, G. B. Erdakos and R. A. Kamphaus. 2000. *Tsunami hazard map of the southern Washington coast – modeled tsunami inundation from a Cascadia subduction zone earthquake.* Washington Division of Geology and Earth Resources Geologic Map GM-49, 1 sheet, scale 1:100,000, with 12p. text.

Comment O67-7

Nor can these measures be justified as anticipating ASCE7-16.

The modeling and design assumptions for the ASCE7-16 chapter, Tsunami Loads and Effects, are publicly available. The chapter itself has been approved by the ASCE subcommittee and will be published next year. The Tsunami Impact Modeling and Analysis report that accompanies the DEIS (Appendix C) states that it incorporates measures "in anticipation of" that new chapter.12 But unfortunately the modeling carried out to support the DEIS was not, in fact, based upon the modeling and design assumptions that will form the basis for ASCE7-16. Instead it adopts a number of very conservative assumptions that ultimately result in design criteria that are much more stringent than may be expected under ASCE7-16 and IBC-2018. While it is appropriate for the DEIS to anticipate future tsunami design standards, the resulting mitigation conditions should not be more stringent than the standards that will be set for similar facilities under building code provisions that are still years away from implementation.

Following are the specific areas where the DEIS analysis is more conservative than contemplated by ASCE7-16, or more conservative than the data presented in the DEIS itself:

- Design Earthquake Magnitude. ASCE7-16 is based upon a Maximum Considered Tsunami with a magnitude that has a 2 percent chance of being exceeded in 50 years, also expressed as 1-in-2475 annual odds of being exceeded (i.e., 0.02% chance in any year). The DEIS, however, is based upon a larger magnitude quake with 1-in-3,333 annual odds of being exceeded (0.03% chance in any year). Using an earthquake with a lower probability results in a larger tsunami wave, ultimately projecting wave heights that are greater than those expected to form the basis for the building code that will be adopted in 2018.

  Appendix C also states that it is based upon FERC's seismic design criteria for LNG facilities, Draft-Seismic Design Guidelines and Data Submittal Requirements for LNG Facilities (2007), and several assumptions presented in the analysis are attributed to the FERC document. However, the FERC design criteria direct that tsunami analysis be conducted for 1-in-100 and 1- in-500-year seismic events, not 1-in-2475 year events. [Footnote: Draft Seismic Guidelines at 7 and Appendix A Sec. 6.7.] Thus, the analysis conducted for the DEIS is based upon a tsunami that far exceeds the tsunami design standard suggested by FERC. The DEIS also notes that the State of Washington Geology Division's tsunami modeling was based on a 1-in-500 year event, as FERC recommended, and using that modeling the projected wave height at Hoquiam would only be 2 to 3.5 feet. [Footnote: DEIS at 3.1-14.] A wave of that magnitude might not even overtop the secondary containment surrounding Westway's proposed tank farm.
- Subsidence. When a CSZ quake occurs, the Grays Harbor area as a whole is expected to experience a drop in elevation, called subsidence, as slipping of the continental tectonic plate over the ocean plate reduces uplift of the plate continental plate. The DEIS notes that the CSZ earthquake that hit the region in 1700 caused subsidence ranging from 2 to 5 feet. [Footnote: DEIS at 3.1-13.] It estimates that if a CSZ-sized earthquake were to occur during the life of Westway's project, the site (and the surrounding towns and Grays Harbor as a whole) could experience subsidence of 5 feet. Yet rather than modeling the impact of 2 to 5 feet of subsidence, which would be consistent with the historical record, Appendix C assumes subsidence of 9.61 feet. [Footnote: DEIS Appx. C at 6.] This assumption has the effect of adding 5 feet to the height of the tsunami wave that would hit the project site and the surrounding community.

- Modeling Adjustment. Appendix C indicates that all water elevations were increased by a factor of 1.3 as a "safety factor" to account for potential modeling errors, a step attributed to FERC requirements. [Footnote: DEIS Appx. C at 3.] This adjustment factor is inappropriate here, for several reasons. First, FERC recommended that tsunami impacts be modeled for much lower magnitude earthquakes, which justifies inclusion of a safety factor. Second, the FERC guidance is based upon USGS National Seismic Hazard Maps, which are based upon much less refined earthquake modeling. A large safety factor cannot be justified in light of the much more detailed, site-specific modeling performed for the DEIS. Third and finally, ASCE7-16 includes no such "safety factor."

  The combined effect of these overly conservative assumptions is a projection of tsunami wave height that is not consistent with the FERC guidance purportedly relied upon and well beyond a reasonable worst-case projection, let alone an impact that has a "reasonable likelihood" of occurring. The wave height and resulting tsunami design forces should be recalculated using assumptions more consistent with ASCE7-16.

Response O67-7

The ASCE design standards for tsunamis, ASCE7-16, are expected to be included in the next edition of ASCE 7 Standard, Minimum Design Loads for Buildings and Other Structures. However, as noted in the comment, these design standards are still in development and will be subject to review before they are approved. Once approved, the standards may be incorporated into applicable building codes and adopted by local agencies. Because the standards have not been approved or incorporated into building codes, although they were considered in developing the analysis presented in Appendix C, *Tsunami Impact Modeling and Analysis*, the criteria were not strictly used as the basis for evaluating tsunami hazards and proposing mitigation measures to reduce potential impacts. Rather, the analysis of tsunami hazards presented in Draft EIS Appendix C is based on existing requirements and the best information that was available at the time of the analysis, consistent with anticipated ASCE 7-16 guidance.

This estimation reflects development of tsunami design standards where information is evolving quite rapidly, making it possible that there will be differences between the EIS criteria and those eventually required per ASCE 7-16. While the methods described in Draft EIS Appendix C differ in some respects from what is anticipated to be eventually released in ASCE 7-16, the standards applied to the Draft EIS are not necessarily more conservative than what would otherwise be required. For example, while the Draft EIS analysis assumes greater subsidence than the latest publicly available draft of ASCE 7-16, it assumes a lower magnitude earthquake and the same safety factor of 1.3. Based on the interplay of these various factors, it is possible that predicted wave heights demonstrated by the analysis in Appendix C could be smaller or greater than those based on the eventual ASCE 7-16 guidance. However, it is anticipated that the results of a risk assessment based on either set of criteria (the Draft EIS or ASCE 7-16) would be roughly on the same order of magnitude.

Comment O67-8

Finally, since ASCE7-16 is scheduled to be published shortly after the FEIS is issued, well before the project design is finalized, the mitigation condition requiring evaluation of the technical feasibility of constructing facilities that will withstand the forces listed in Appendix C Table 3 should allow Westway the alternative of evaluating the tsunami forces that would be applicable to the site under

the ASCE7- 16 standard, which – unlike the draft FERC guidance from 2007 – will form the basis for the 2018 update to the International Building Code.

Response O67-8

As noted, the collection of information regarding seismic events and resulting tsunamis is an ongoing process. If the proposed action is approved, at the time of final design review for the proposed facilities and issuances of the necessary building permits, the facility design will adhere to the current building standards or the standards presented in the Final EIS, whichever is more conservative, to ensure the highest level of protection to the community and the environment. Final EIS Chapter 3, Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* clarifies that the potential for release of crude oil from the storage tanks as a result of damages from an earthquake and tsunami would be minimized with mitigation measures for design and construction of the proposed storage tanks.

Comment O67-9

Air

Diesel Particulate Matter (DPM) Emissions From Railyard Operations

The DEIS presents the results of modeling of potential emissions of DPM from locomotives conducting switching operations between Poynor Yard and Westway's site. [Footnote: DEIS at 3.2-14 to 3.2-17.] The input parameters for that modeling are not reported in the DEIS or its appendices. However, based on the response received to inquiries regarding the model, it seems the modeling includes three basic assumptions: (1) that three locomotives will be used for the switching operations; (2) that the locomotives will all be powered by what EPA has designated as Tier 0 engines; and (3) that moving each train between Poynor Yard and Westway's facility will involve a collective total of 10 hours of locomotive engine idling time. Each of these assumptions overstate likely operating practices and emissions.

Based on discussions with PS&P, only two locomotives are likely to be used in moving cars between Poynor Yard and the Westway terminal. As discussed in DEIS Appendix K, arriving unit trains would be broken down into shorter strings of cars and those shorter strings would be shuttled to the Westway terminal. Three locomotives would not be needed for this work. Indeed, Appendix K shows at least one of the locomotives being parked at Poynor Yard during switching operations.

The assumption that all locomotives would be Tier 0 also appears to be based on PS&P's current locomotive fleet. However, PS&P has informed Westway that unit trains will be delivered to Hoquiam and switching operations will be conducted by locomotives operated by the Class 1 railroads (Union Pacific or BNSF). While Westway has not been able to obtain detailed information from the Class 1 railroads regarding the average age of their locomotive fleet, they use a mix of Tier 0, Tier 2 (anything bought after 2003), and Tier 3 and 4 (anything bought after 2012) locomotives. EPA's guidance regarding emission factors for locomotives [Footnote: EPA-420-F-09-025 (April 2009)] provides an emission factor for Tier 2 locomotives engaging in switching operations that is less than half the emission factor for Tier 0 locomotives. [Footnote: The PM10 emission factor for Tier 0 is 0.44 g/bhp-hr, while for Tier 2 it is 0.19 g/bhp-hr.] Rather than use the worst-case assumption that all locomotives are Tier 0, the DPM modeling should use a more realistic assumption that a percentage of the locomotives are lower emitting Tier 2.

Finally, the assumption that locomotives will be idling in the yard area for 10 hours during switching operations is not consistent with PS&P's practices to minimize idling. Westway understands that this issue will be addressed by PS&P in their comments on the DEIS.

Response O67-9

The Final EIS air emissions and cancer risk analysis in Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant. The proposed mitigation measure for air quality monitoring near the project site is no longer warranted.

Additionally, based on information provided by PS&P regarding its policy limiting locomotive idling to 15 minutes, Section 3.2.7.1, *Applicant Mitigation*, reflects the removal of the mitigation measure related to minimizing locomotive idling.

Comment O67-10

Greenhouse Gas Emissions

The DEIS provides an estimate of greenhouse gas (GHG) emissions associated with Westway's project, of which two-thirds are attributed to mobile source emissions from all associated rail transportation within Washington's borders. [Footnote: DEIS at 3.2-18 to 3.2-21. 22 DEIS at 3.2-21.] Westway does not object to the DEIS evaluating all associated rail emissions within the State of Washington, but would point out that—consistent with the relatively small contribution of the Project to the U.S. crude oil transportation network—It would have been sufficient to evaluate rail emission along the short line railroad from Centralia to Hoquiam.

Ecology's internal guidance for incorporating GHGs into SEPA analysis suggests that the analysis focus on new emissions that are "proximately caused" by a proposal. In this context, proximate cause means a reasonably close causal relationship. There already is a substantial amount of crude oil moving by rail through Washington, and even more being moved in vessels off Washington's coast. As with other aspects of the SEPA analysis, it is appropriate for the DEIS—and the FEIS—to focus on the ways in which this particular project will modify that broader transportation network. The Westway terminal is not large enough to materially change the pathways for crude oil movement in the United States. But it will open a new pathway between Centralia and the mouth of Grays Harbor.

As the DEIS points out, throughput for Westway's terminal at full capacity would equate to only 0.0032% of the U.S. daily crude oil supply in 2013.22 And as the DEIS further notes, "much of the crude oil being transported to the new facility would replace crude oil that was previously transported by tank ship." [Footnote: DEIS at 3.2-20.] As Westway pointed out in its general comments above, west coast refineries import a substantial amount of crude oil from other nations. The crude oil moved through Westway's terminal is most likely to displace some of those imports. To the extent the co-leads give any further consideration to GHG emissions outside of the State, they should recognize that this displacement translates into a reduction in vessel GHG emissions from moving oil that is imported to the west coast from places like Angola, Columbia and Indonesia.

Response O67-10

Draft EIS Chapter 3, Section 3.2, *Air*, presents estimates of greenhouse gas emissions from onsite operations and offsite transport within Washington State related to the proposed action. The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for more information on the potential sources and destinations of crude oil under the proposed action. The section acknowledges that crude oil handled at the project site would likely replace crude oil that is currently transported from other locations. The Final EIS presents net greenhouse gas emissions, based on a conservative estimate of offset emissions, assuming replacement of crude oil from the Alaska North Slope.

Comment O67-11

Noise and Vibration

The DEIS concludes that train horns that are sounded as a safety measure at rail crossings could impact residential areas that are near a number of crossings along the PS&P route. [Footnote: DEIS at 3.7-14 to 3.7-17.] The DEIS identifies this as a potential unavoidable adverse impact. Westway would observe that it is incongruous to label a safety measure that is intended to reduce the very real risk of collisions between trains and vehicles or pedestrians—a practice that railroads are, in fact, required to engage in under federal regulatory requirements—as an adverse impact. Westway also observes that the DEIS recognizes that railroads engaged in interstate commerce are exempt from Washington State's maximum permissible noise level regulations. [Footnote: DEIS at 3.7-17.] That exemption recognizes the federal preemption of state regulation of railroad safety practices.

The DEIS also points out that federal regulations authorize the establishment of quiet zones, in which trains would not be required to sound their horns at crossings. [Footnote: DEIS at 3.7-17.] Quiet zones may only be established if the Federal Railway Administration (FRA) determines that its safety requirements are met. It is, therefore, appropriate that the mitigation for this impact proposed by the DEIS would only be triggered if requested by an affected community and would be subject to FRA approval. [Footnote: DEIS at 3.7-18 to 3.7-19.]

Response O67-11

Final EIS Chapter 3, Section 3.7, *Noise*, clarifies in the proposed mitigation measure that the applicant would support local communities in applying for quiet zones at crossing where severe impacts from increased train horn soundings were identified.

Comment O67-12

Tribal Resources and Vessel Traffic Impacts

The DEIS identifies potential impacts arising from conflicts in the navigation channel between the increased vessel traffic associated with Westway's project and other users, such as commercial, tribal, and recreational fishing vessels. [Footnote: See, e.g., DEIS at S-14, S-17-18, 3.10-13 to 3.10-15, 3.12-16 to 3.12-22, 3.17-19 to 3.17-34.] Although any increased traffic in the navigation channel will undoubtedly require coordinated usage of a common resource, the increase in vessels calling on the Westway terminal is insignificant in light of the historical usage of a well-established commercial vessel route. The DEIS unreasonably overstates the impact of increased vessel traffic associated with

modest economic growth, where the point of comparison is the status quo in one of the worst economic slumps in modern history.

As the DEIS acknowledges, Grays Harbor has historically supported vessel traffic for commercial purposes, with large commercial vessel calls at facilities maintained by the Port and private areas. [Footnote: DEIS at 3.17-5 – 3.17-6.] Nonetheless, the DEIS evaluates Westway's proposed project in relation to the commercial vessel traffic in the five year period between 2008-2012, during one of the worse recessions in the last century [Footnote: DEIS at 3.17-16], which is not representative of historic vessel traffic, even without taking into account the dramatic decline in commercial vessel traffic that occurred in Grays Harbor during the decade that preceded the period discussed in the DEIS.

The DEIS notes that, during the 2008-2012 period, there were a total of 1,515 vessel trips (1,448 cargo vessels and 67 tank vessels)—an average of 303 per year. [Footnote: DEIS at 3.17-19.] Under the no action alternative, large commercial vessel trips in the navigation channel are projected to increase from 338 in 2017 to 436 in 2037. [Footnote: DEIS 3.17-26. Note that an analysis performed for Westway by Worley Parsons ("Worley Parsons"), which was previously submitted to the co-leads for their consideration, indicated that 591 vessel transits occurred in 2013.] Westway's proposal will result in an additional 119 vessels annually. [Footnote: See DEIS at 3.17-31.]

This expected increase in vessel traffic is insignificant when compared to the historical use of Grays Harbor during periods of high commercial traffic before the economic downturn. In 1990, for example, before regulatory changes undermined the viability of commercial logging in the area, Grays Harbor hosted 7,290 commercial vessel transits. [Footnote: Worley Parsons at iii.] Historical trends show that even after 1990, when logging-related transits sharply decreased, commercial vessel traffic in Grays Harbor continued at a rate of nearly 1000 vessel transits per year between 1991 and 2012. [Footnote: Worley Parsons at 45, Exhibit 4-2.] The anomalous drought of economic activity over the 2008-2012 period is not indicative of the usage in Grays Harbor that has experienced for the last twenty-five years.

Response O67-12

Traffic volumes and the type of commercial vessels common in the port have changed dramatically since the 1990s, as lumber industry activity diminished in Grays Harbor. As new projects are initiated, vessel traffic will continue to evolve. Given this variability, the Draft EIS uses historical data for the most recent 5-year period available at the time of the analysis (2008–2012) to account for year-to-year variability and the most current activities in the port. Although vessel traffic levels were higher prior to this 5-year period, from 1999 through 2006, no tanker and tank barge traffic occurred in Grays Harbor.6 The decline of the lumber industry activity in the 1990s also resulted in the decline of the related liquid bulk industries such as bunkering barges or tankers carrying chemicals for the forest product manufacturing industry.7 When looking at traffic volumes, it is important to consider the type and size of the vessel, draft, commodities, and origins and destinations within the port. The 5-year period (2008–2012) was selected to represent a period when traffic levels with vessels carrying liquid bulk commodities began to increase in Grays Harbor

[6] Washington State Department of Ecology. 1999 to 2006. *Vessel Entries And Transits for Washington Waters 1999–2006. Spill Prevention, Preparedness and Response Program*. Available: https://fortress.wa.gov/ecy/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Spills&DocumentTypeName=Publication.

[7] WorleyParsons. 2014. *Rail Transportation Impact Analysis for Westway and Imperium.* April. Page 44.

after a long slump. It is important to note that the changes in commercial vessel types were due to economic factors and market driven and not related to changes in port infrastructure such as channel depth. Although the U.S. Army Corps of Engineers obtained a Navigation Improvement Project authorization in 1986 for deepening the navigation channel to a project depth of -38 feet mean lower low water, they did not implement the channel deepening aspect of this project. The channel depth remained at -36 feet from the bar to Cow Point and -32 feet from Cow Point to Cosmopolis, based on detailed post-authorization engineering, environmental, and economic studies.8

Draft EIS Chapter 3, Section 3.17.5.2, *Proposed Action*, evaluates potential conflicts of large commercial vessels with smaller recreational and fishing vessels in the harbor by determining the extent of traffic related to these smaller vessels in the harbor (number of vessels, nature, geographic extent, and timing of operations) and qualitatively assessing the extent of the disruption to these vessel operations because of large commercial vessel traffic within the navigation channel. Final EIS Section 3.12, *Tribal Resources*, and Section 3.17, *Vessel Traffic*, have been revised to address historical vessel use in the harbor relative to the current period used in determining impact of the proposed action.

Comment O67-13

Even within the context of this skewed baseline, the DEIS anticipates that the impact on recreational and commercial fishing will be insubstantial and/or mitigated through appropriate notification procedures. [Footnote: DEIS at S-14, S-19, 3.10-13 to 3.10-14, 3.17-31 to 3.17-32.] However, the DEIS characterizes the impact on tribal fishing activity as a potential unavoidable and significant adverse impact, as a result of the increased vessel traffic by one vessel trip every other day, which could "exclude tribal fishers from a portion of their typical fishing area within the navigation channel," in addition to potential tank vessels blocking tribal access to the ocean. [Footnote: DEIS at S-16, 3.12-17 to 3.12-21.]

This characterization of the degree of impact on tribal fishing activity is not supportable, given the much higher level of vessel traffic that historically has occurred in the Port of Grays Harbor. The DEIS also suggests that the mere presence of vessels tied up at the terminal is a material impediment to tribal fishing in the river—not because the portion of the river adjacent to the terminal is especially productive, but simply because of the potential loss of one of many stations along the river where fishing may occur. Also missing from the DEIS's discussion of this potential impact is historical context regarding the long history of port activity at this location. In the 1940s, the area now occupied by the Westway facility was a harbor slip, with a variety of vessels moored in the slip and vessel traffic in and out of the area. There also was barge traffic at the site for the last few decades, after the slip was filled and the area developed as another port terminal area. And Westway has been using the dock for vessel traffic since 2009.

Westway is committed to implementing the mitigation measures identified in the DEIS—in particular, working with the Quinault Indian Nation tribal officials to coordinate docking schedules in relation to fishing schedules, provide notice of vessel calls, and other measures that the parties may identify. Nonetheless, Westway does not agree that the addition of a single vessel trip every other day will cause "unavoidable and significant adverse impacts" to stakeholders that have

[8] U.S. Army Corps of Engineers. 2014. *Navigation Improvement Project (NIP) General Investigation Feasibility Study* (FINAL) Limited Reevaluation Report published in June 2014

historically exercised their fishing rights despite the presence of at least seven times the number of vessels in the area in a given year.

Westway is hopeful that its project will assist in rejuvenating the Port of Grays Harbor, which has seen a drastic downturn in activity during the recent recession, and will work with all stakeholders to ensure that shared access to this resource continues. However, comparing the impacts of Westway's proposal to a period of economic stasis presents an inaccurate picture of the balance that all users of Grays Harbor, including tribal, commercial, and recreational fishers, have accomplished in the past. Westway's proposal is consistent with the historical use of the navigation channel for commercial purposes and the expected vessel traffic is far below the frequency that has borne out as a reasonable use consistent with other purposes, including those of the Quinault Indian Nation.

Response O67-13

Vessels related to the proposed action would travel through usual and accustomed fishing areas in Grays Harbor. Draft EIS Chapter 3, Section 3.12.8, *Would the proposed action have unavoidable and significant adverse impacts on tribal resources?* concludes that under current and future conditions, this vessel traffic could restrict access to tribal fishing areas in the navigation channel and adjacent to Terminal 1. It acknowledges that because other factors besides vessel operations affect fishing opportunities—such as the number of fishers, fish distribution, timing, and duration of fish windows—the extent to which this vessel traffic would affect tribal fishing is difficult to quantify and that no mitigation measures would completely eliminate the possibility of impacts.

Comment O67-14

Rail Traffic Impacts

The DEIS describes the potential impacts of rail switching operations on grade crossings (total time crossings would be blocked by trains) [Footnote: DEIS at 3.15-23 to 3.15-27] based upon a hypothetical operating scenario that is graphically presented in DEIS Appendix K. Westway has discussed the scenarios described in the DEIS with PS&P and understands that PS&P will respond to this aspect of the DEIS in its own comments. However, Westway would note that with regard to the process of building trains prior to their departure eastbound, the DEIS overstates the impact on the access points to Olympic Gateway Plaza in Aberdeen. PS&P has indicated that during the doubling operations necessary to rebuild trains it will be able to substantially avoid impacting the easternmost crossing (Fleet Street), and that any blockage that occurs will be due to a moving train. As a result, the time period when all access points to Olympic Gateway Plaza would be blocked appears to be overstated in the DEIS.

Response O67-14

The Draft EIS Appendix K, *Rail Traffic Technical Information*, Section K.4, analysis of gate downtime assumes that trains would depart after assembly because blocks of cars would be tested in the yard prior to assembly of the train, so it assumes no blockages during inspections. If trains were to be inspected after assembly, they could be pushed back to clear the entrances to the Olympic Gateway Plaza during the inspection process; however, other crossings would be blocked. As noted in Final EIS Chapter 3, Section 3.15.5.2, *Proposed Action*, actual operations could vary and would be dependent on specific circumstances such as the availability of the crewmembers and space and facilities in Poynor Yard. The Draft EIS represents a reasonable depiction of the process of delivering and releasing a 120-car unit train.

Comment O67-15

Westway has reviewed comments submitted by the City of Aberdeen Fire Department on this issue. [Footnote: Letter from Tom Hubbard, Fire Chief, City of Aberdeen Fire Department, 3-4 (Oct. 14, 2015).] The Department expressed concern regarding the ability to access the Olympic Gateway Plaza area when it is blocked by rail lines, because the proposed access areas are not feasible alternative pathways for emergency personnel. Westway notes that access to this area is currently an issue with respect to existing train traffic and will not be created solely by the increased train traffic associated with Westway's proposal. Nonetheless, Westway understands that—in addition to the mitigation measures described in the DEIS—PS&P is prepared to respond operationally in the event of an emergency at the Olympic Gateway Plaza, decoupling cars and clearing a crossing during the doubling operation discussed above if needed to allow access by emergency personnel.

As noted below, Westway also is committed to providing additional fire suppression capabilities and associated training to ensure that the Department is prepared to respond to issues in the area.

Response O67-15

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Comment O67-16

Chapter 4: Environmental Health and Safety

Chapter 4 of the DEIS provides a thorough evaluation of the low risk that any significant amount of crude oil could be spilled from operations at Westway's terminal or during upstream or downstream transportation by rail or vessel. It also provides a helpful overview of the well-understood contingency planning and spill response practices that have been developed to prepare against that possibility. The Exxon Valdez spill in 1989 was a critical watershed event that spurred the development of comprehensive federal and state laws and regulations to assure that responders are available and properly equipped to contain and recover as much oil as possible in the event of a spill from a vessel or storage facility. Those laws have been in place for more than two decades, their requirements are well understood, and they have proved effective in reducing the number of spills and minimizing the impacts of those spills that do occur. While the laws governing spill prevention and response for railroads are not yet as well developed, PS&P has indicated that it is prepared to voluntarily undertake comparable measures, which are reflected in mitigation conditions described in the DEIS.

Westway supports PS&P's contingency planning and development of spill response capabilities, as well as the upgrading of resources available in Grays Harbor to respond to vessel or terminal spills.

Response O67-16

Final EIS Section 3.15.4.5, *Ongoing Maintenance and Inspections,* reflects PS&P commitments to additional safety measures with respect to the transport of crude oil.

Comment O67-17

The spill response resources currently available in the Grays Harbor area are consistent with the current mix and volume of products stored and transported through the Port. With the introduction of crude oil storage and transport, the local spill prevention and response resources will need to be upgraded along the lines described in the DEIS.

Response O67-17

Comment acknowledged.

Comment O67-18

The DEIS identifies the potential for environmental damage that could result from oil spills from vessels or railroads as potential unavoidable and significant adverse environmental impacts. Most of the risks and potential injuries discussed in the DEIS are associated with rail and vessel transport. Westway does not own, operate, or control rail lines or vessels and it will not own the crude oil stored at its facility. Westway is committed to collaborating with the other participants in the transportation network to implement all feasible actions to minimize and mitigate the risks associated with transporting and storing crude oil. But the Westway terminal is only a node in the broader transportation network and most of the risks discussed in the DEIS are associated with the roles that others play in that network. Major mitigation measures that are proposed in the DEIS also would be implemented by those other participants.

It certainly is appropriate to lay out the upstream and downstream risks in the DEIS and to set expectations for mitigation of those risks. The DEIS does so, examining the risks associated with explosions occurring during transportation and provides ample mitigation measures to minimize this risk to the maximum extent feasible. With respect to rail lines, the DEIS acknowledges that the possibility of a derailment and resultant explosion is low due to the slow speed limits on the PS&P rail line. The mitigation measures set out in the DEIS will further limit the possibility of accidents on trains distributing crude oil to Westway's terminal, such as ensuring that rail cars meet or exceed new federal design or performance standards, crude oil delivered to Westway's terminal has been properly classified and characterized, and trains have functioning two-way end-of-train device or distributed power for operations on the PS&P rail line to the local yard.

Response O67-18

Comment acknowledged.

Comment O67-19

Westway understands that the City of Aberdeen Fire Department has expressed concern that it lacks sufficient resources to respond to a fire stemming from a tank car carrying crude oil or methanol, because the Department does not have sufficient quantity of appropriate foam to address a crude oil fire stemming from a tank car and the Department's available apparatus needs to be paired with a fire engine to pump and provide foam to address a fire stemming from methanol. [Footnote: Id. at 3.] Westway already has provided a foam truck for use by the local fire departments in connection with the facility's existing methanol handling operations. The DEIS calls for a second foam truck, which the DEIS slates for the Elma Fire Department, but which could instead be prepositioned at a location agreed to by East Grays Harbor County emergency responders. In addition, to increase availability

and foam capacity, Westway can supply three additional totes of Alcohol Resistant Film Forming Foam ("AR-AFFF") on site (suitable for fighting crude oil or methanol fires) that can be picked up or delivered. Westway is committed to working with the Department to ensure that proper training and response times can be tested in advance of when the project is completed.

Response O67-19

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks.

In Final EIS Section 4.4, *Environmental Health Risks—Terminal (Onsite)*, the proposed measure to provide additional firefighting equipment to respond to an incident at the project site has been clarified to better reflect the needs of local service providers. Westway's provision of additional totes of Alcohol Resistant Film Forming Foam has been added to this section as a voluntary measure.

Comment O67-20

The DEIS also acknowledges that the risk of explosions associated with vessel transport is reduced by the well-developed network of regulatory controls governing vessel transport of flammable materials and would be addressed by the processes set out in the emergency response plan. The broad scope of mitigation measures addressing any type of vessel accidents or incidents further minimizes this risk. These measures include ensuring the presence, procedures, and specifications of escort tugs accompanying laden tankers or barges, working with federal, state, and local entities to develop and implement procedures for tracking and monitoring vessel movements, and training, education, and reporting efforts. Westway anticipates that these broad measures will be more than sufficient to supplement the existing capacity of the Aberdeen and Hoquiam Fire Departments, which are not by themselves equipped to handle a vessel fire involving flammable liquids. [Footnote: See id. at 5.]

Response O67-20

Comment acknowledged.

Comment O67-21

The co-leads almost certainly will receive comments on the DEIS suggesting that rail and vessel oil spill risks upstream and downstream from the Westway terminal are too great, and that those risks warrant denying Westway's application for a shoreline substantial development permit. There are limits to the hook that Westway's shoreline permit can provide for imposing regulatory requirements on other companies and activities that are only indirectly linked to Westway's operation. There also are legal limits on the ability of state and local governments to regulate rail operations and those limits cannot be avoided by trying to impose requirements indirectly through Westway. Nor are mitigation conditions that can only be implemented by parties that are not bound by the terms of the shoreline permit the most reliable means for reducing upstream and downstream oil spill risks. But contrary to the apparent expectations of some of opponents to this project, there is no single permit decision that can respond to all of the risks posed in a transportation network that stretches across our nation.

A more appropriate way to address the risks associated with the transportation of petroleum products is to engage in a regulatory process addressing specific transportation sectors.

Response O67-21

Refer to the Master Response for Mitigation Framework for more information about the development of mitigation in the Draft EIS and Master Response Emergency Response and Planning Gaps Evaluation for additional information about how the Draft addresses emergency preparedness planning and response gaps, particularly for transportation-related impacts.

Comment O67-22

As noted above, the federal government and Washington State did just that more than 20 years ago for oil transported by vessels and stored in facilities like Westway's. The detailed contingency planning regulations, regional response plans and spill drill programs now in place are testaments to the success of that effort.

This also is precisely what has occurred recently in response to the significant increase in the volume of crude oil moving by rail, again at the federal and state level. For example, in May 2015, the Department of Transportation announced a final rule to strengthen safety standards for transportation of flammable liquids by rail, including enhanced tank car standards, new braking standards, new testing and sampling requirements to determine product stability, and new operational protocols, such as routing requirements, speed requirements, and informing local agencies. Washington State recently passed the Oil Transportation Safety Act, which requires railroads to conduct spill response planning and provide information to the state regarding oil transport activities and assist first responders, ensuring that shippers, railroads, and communities are working together to provide adequate first responder training and equipment. These laws are only the most recent steps taken to improve on the pre-existing web of protections designed to minimize the potential for accidents associated with transporting crude oil.

Response O67-22

As noted in the revisions to Chapter 4, Section 4.2, *Applicable Regulations*, the Washington State Department of Ecology has finalized two new rules to implement revisions to RCW 88.46.010 and RCW 90.56.210.

- Chapter 173-185 WAC, Oil Movement by Rail and Pipeline Notification, implementing RCW 88.46.010, enhances oil spill preparedness and response in Washington State by creating reporting standards for facilities that receive crude oil by rail and identifying reporting standards for Ecology to share information with emergency responders, local governments, tribes, and the public.
- Chapter 173-186 WAC, Oil Spill Contingency Plan – Railroad, implementing RCW 90.56.210, establishes contingency planning requirements for railroads transporting oil in bulk to ensure that first responders are aware of the locations of oil transport, oil response equipment, and are trained to respond in a rapid, aggressive, and well-coordinated manner

Comment O67-23

Conclusion

The DEIS provides a comprehensive evaluation of the potential environmental impacts that would result from the construction and operation of Westway's proposed expansion of its Grays Harbor terminal. The mitigation measures discussed in the DEIS could be improved in some respects, as discussed above. The DEIS also is overly conservative in estimating some impacts, including the impact of trains on vessel traffic, the impacts of port operations on tribal fisheries, and the design standards for resistance to tsunami impacts. Nevertheless, it is a good document and a solid foundation for the development of a Final EIS for the Westway project.

Sincerely,

Svend Brandt-Erichsen
Counsel for Westway Terminal Company LLC

cc: Brian Shay, City Administrator, City of Hoquiam
Sally Toteff, Regional Director, Washington State Department of Ecology

Response O67-23

Refer to responses to the detailed comments above related to referenced impact conclusions.

O68, Westway Terminal, Steve Williams

Comment O68-1

Great. Thank you. Good afternoon. My name is Steve Williams. I am the terminal manager of Westway Terminal, Grays Harbor location, which has been part of this community since 2009.

I'm also a native of Hoquiam and a proud member of the community, which I still call home.

Westway is a provider of third-party bulk liquid storage, distribution and related services. With 60 years of experience, we have dealt with the best reputation in the industry, meeting customers' and communities' needs with commitment to safety.

The expansion of our terminal represents a long-term commitment to the community to be located at the Port of Grays Harbor, which offers a competitive advantage for companies and our customers. The proposed expansion will enable the existing facility to receive up to 17.8 million barrels of domestic fuel per year and one million of storage capacity.

According to a third-party economic analysis, our project and a similar project at REG next door will create 280 new full-time jobs, paying out 84,000 a year, as well as more than 870 jobs during the year-long construction.

Once complete, the new terminal will contribute more than $61 million to the economy each year and more than two million to state and local tax revenues.

Westway is committed to hiring locally and using local products and services whenever available. This project will be built with our commitment to safety and protect the waterways, the natural resources that our community—that makes our community truly special.

At our terminal there is a sign that tracks the number of days of continuous safe working days and incident-free operations. Today that sign reads 2,159 days, which is every day since we opened our doors in 2009.

Westway looks forward to working closely with Ecology and the City of Hoquiam to meet the high standards of the EIS to build this project with the highest commitment to safety while providing family wage jobs, local jobs which will help our community. Thank you.

Response O68-1

Comment acknowledged.

O69, Willamette Women Democrats, Heidi Fox

Comment O69-1

Our membership is opposed to both the Imperium and Westway EIS. We are committed to fighting Global Warming and the continuing destruction of our eco system. We are also committed to preserving the beauty, tranquility and uniqueness of the Columbia Gorge, a national treasure which deserves protection for future generations. It would be a crime to further degrade this special place. Heidi Fox President, W2D

Response O69-1

Comment acknowledged.

O70, Willapa Grays Harbor Oyster Growers Association, Ken Weigardt

Comment O70-1

11/17/2015

Westway & Imperium Expansion Projects EIS's
c/o ICF International
710 Second Ave, Suite 550
Seattle, WA 98104

The Willapa Grays Harbor Oyster Growers Association (WGHOGA) present the following comments and inquiries we would like to be addressed in the environmental impact statement (EIS) for the proposed Imperium and Westway projects. The Willapa and Grays Harbor Shellfish Growers and Processors are part of a historical and valuable seafood industry along the Washington coast.

These projects present many directly detrimental risks to our growing areas as well as negative impacts with water quality concerns from our customers, the long term values of our property in

and around these estuaries and the lack of any scientifically proven mitigation measures. These two EISs should have been combined along with the third one. WAC 197-11-060(3)(b) states "Proposals or parts of a proposals that are related to each other closely enough to be, in effect, a single course of action shall be evaluated in the same environmental document." Both of these documents were prepared by the same consultants and both involve crude oil storage and shipping facilities in a common area and being shipped by rail on the same rail road tracks. Please explain why they were not combined with the third project that is basically another project with exactly same intent? This appears to be an effort to make the projects seem smaller while making a meaningful review of true potential impacts more difficult.

Response O70-1

The Westway Expansion Project (proposed action) is neither part of a larger proposal nor dependent on the implementation of other new projects in order to proceed; rather, it has independent utility. The proposed action is solely dependent on the approval of the site-specific permits and requirements identified in the Draft EIS. Refer to the Master Response for Connected or Similar Actions.

Comment O70-2

The EISs make many inaccurate statements and assumptions concerning currents and rates at which water flows in and out of Grays Harbor. The wind blows here regularly creating wind wave water movement as well. Please explain how these water movement rates were derived?

Knowing that cleaning up oil spilled into swiftly moving water is impossible, why is oil clean up only considered in what could be called a best case scenario? The Vice Admiral of the U.S. Coast Guard has stated that only 5% to at best 14% of oil spilled into the waters of the state could only be recovered. This means that 86% to 95% of the oil spilled would remain in the environment. This is clearly sufficient to modify the benthic habitat critical to shellfish farms, as well as, habitat for crab and other anadromous fish in this very large watershed. Large private investments have been made into these resources. How will the project proponent be required to assure full and immediate financial restitution is forthcoming to offset all short and long term damages? This kind of crude oil will sink and persist in the environment for decades and may forever be incorporated in the sediment in the form of harden asphalt like tar, making effective cleanup impossible, like the BP spill in the Gulf. The actual damage to the benthic food chain might someday eventually allow some productivity to occur but will the damage perceived by customers and the resulting financial loss to shellfish farmers be accounted for? The Gulf is an excellent example of how crippling a spill can be for shellfish and seafood producer's long term.

Response O70-2

The information presented in Draft EIS Chapter 4, Section 4.3.2.3, *Water Flow*, is intended to generally describe the range of water flow conditions that can occur within the study area and came from The United States Coast Pilot published by the National Ocean Service, which is part of NOAA. Draft EIS Appendix N, *Oil Spill Modeling*, presents in the assumptions relative to wind conditions and water currents within the study area. Wind, tide, and other factors affecting water flow used in oil spill modeling are further described in the notes section of Table 1 (see page N-5 of Appendix N) and in the Master Response for Oil Spill Modeling Methods.

Weather and water data, including wind, tide, and water current information, used in the GNOME oil spill modeling effort presented in Draft EIS Appendix N, *Oil Spill Modeling*, were derived from Location Files prepared by the National Oceanic and Atmospheric Administration. GNOME uses Location Files that contain site-specific information about the area being modeled. This modeling effort used a Location File that contained information about Grays Harbor.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on benthic habitat.

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Comment O70-3

The outgoing chair of the NTSB, Deborah Hersman said in her farewell address that U.S. communities are not prepared to respond to worst case accidents involving trains that carry crude oil and ethanol. Hersman also said that the NTSB is overwhelmed by the number of oil train accidents because of a lack of rail investigators. The requirement for new safer oil tank cars has been moved back several years meaning that the old tank cars will be traveling through our state for several more years. The DEIS acknowledges that the sole method to deal with tank train fires is to stand back and let them burn. How will first responders deal with an emergency from accidents or spillage? Are plans adequate to respond with sufficient response equipment and supplies in accordance to the magnitude of and volume of the oil shale bitumen that is planned to be transported? Where is spill containment equipment going to be stored? The need for upgrading the 100+ year old PS&P facilities needs to be included. The acting administrator Sarah Feinberg of the FRA is on record (3/20/2015) as stating that the newer tank cars are only marginally improved over the old DOT-111 cars, and will not survive a derailment over 16-18mph. She also says "I would prefer that none of this stuff be traveling by rail". Will train speeds therefore be restricted to 16-18mph? The current railroad infrastructure (rails, beds, trestles) is severely neglected. Will the railroad infrastructure be upgraded to meet the greatly increased volume and weight and other safety features to transport these highly dangerous materials to avoid collisions and derailments? Liaisons and reports will do nothing to mitigate the real and potential environmental and economic impacts of increased rail traffic, depressed property values and loss of access at railroad crossings. How can you say that risk would remain relatively low?

Response O70-3

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and

train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. For additional information about the analysis of risks in the extended study area, refer to the Master Response for the Geographic Scope of the EIS.

Comment O70-4

Is the city of Hoquiam in a position to adequately respond to an emergency at the future size and dangers of the tank farms? Will the city of Hoquiam be a responsible party for marine near shore damage when it occurs?

Response O70-4

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment O70-5

Virtually all municipalities from Centralia to Hoquiam have passed anti-oil resolutions. Were these resolutions considered in the analysis of these proposed projects? The oil trains do not begin their journey towards the coast in Centralia. Please explain why the scope of analysis only includes areas from Centralia westward? At the very least the analysis should begin from the point that these trains enter our state. A spill along the Columbia River will have impacts all the way to the coast where the Columbia River empties into the ocean where pollutants will be further distributed up our coastline endangering shellfish on the outer coast as well as in Willapa Bay and Grays Harbor. SEPA doesn't require a limited study area, how was the Centralia cut off determined and why?

Response O70-5

The resolutions and changes to the land use plan would not affect the proposed action, because the proposed action was already under review when the resolutions were passed. Final EIS Section 3.8, *Land and Shoreline Use*, has been revised to clarify this.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area

Comment O70-6

In the Onsite Operations section it states "storage tanks could also become ruptured and result in a leak of bulk liquids into the environment. The proposed action would be designed to meet local building codes and standards". These tanks are located at the water's edge and will not be attached at their bases. "The applicant would be required to study the possibility of designing the proposed facilities to reduce the impacts of a large scale tsunami event. Mitigation would be required if it was deemed reasonable and feasible." Please explain how local building codes are being updated to deal with a large scale tsunami or earthquake? What is the mitigation for such an event? The impacts of earthquakes and resulting tsunamis and severe storms become more probable as sea level continues to rise. Are costs of these critical geological impacts factored in?

Response O70-6

The applicant's current designs assume that tanks would sit on top of the foundation without mechanical attachment to the slab and that the weight of the tanks themselves would hold them in place. However, final design and construction would be based on detailed geotechnical analysis and civil design in accordance with current building and fire codes and associated standards and requirements.

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. To inform the risk of tsunamis at the project site, an updated tsunami model was completed and an updated assessment of tsunami risks specific to the project site, which accounts for sea-level rise, is presented in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis.* Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment O70-7

What sort of bond or arrangement will form a guarantee?

Response O70-7

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment O70-8

The atmospheric increase in certain gases will be exacerbated by the shipping of oil shale bitumen. Has a tax or fee on those profiting from the overseas sale been proposed to offset these long term costs to local areas and industries?

Response O70-8

Inclusion of taxes and fees related to the handling of commodities at the project site is beyond the scope of the EIS. Refer to the Master Response for the Purpose and Focus of the EIS.

Comment O70-9

Near shore facilities are at a greater risk of impacts from tsunamis and earthquakes. The Fukushima Japan earthquake and tsunami is a recent and horrifying example of just how bad things can get during such an event. Both onshore and offshore surrounding areas are at a very high risk considering the huge amounts of oil that can be stored at these sites. What plans or provisions are being made for what scientist say is a very high probability of such an event occurring on the west coast?

Response O70-9

The ASCE design standards for tsunamis, ASCE7-16, are expected to be included in the next edition of ASCE 7 Standard, Minimum Design Loads for Buildings and Other Structures. However, as noted in the comment, these design standards are still in development and will be subject to review before they are approved. Once approved, the standards may be incorporated into applicable building codes and adopted by local agencies. Because the standards have not been approved or incorporated into building codes, although they were considered in developing the analysis presented in Appendix C, *Tsunami Impact Modeling and Analysis*, the criteria were not strictly used as the basis for evaluating tsunami hazards and proposing mitigation measures to reduce potential impacts. Rather, the analysis of tsunami hazards presented in Draft EIS Appendix C is based on existing requirements and the best information that was available at the time of the analysis, consistent with anticipated ASCE 7-16 guidance.

This estimation reflects development of tsunami design standards where information is evolving quite rapidly, making it possible that there will be differences between the EIS criteria and those eventually required per ASCE 7-16. While the methods described in Draft EIS Appendix C differ in some respects from what is anticipated to be eventually released in ASCE 7-16, the standards applied to the Draft EIS are not necessarily more conservative than what would otherwise be required. For example, while the Draft EIS analysis assumes greater subsidence than the latest publicly available draft of ASCE 7-16, it assumes a lower magnitude earthquake and the same safety factor of 1.3. Based on the interplay of these various factors, it is possible that predicted wave heights demonstrated by the analysis in Appendix C could be smaller or greater than those based on the eventual ASCE 7-16 guidance. However, it is anticipated that the results of a risk assessment based on either set of criteria (the Draft EIS or ASCE 7-16) would be roughly on the same order of magnitude.

Comment O70-10

The 2012 law passed by legislature directing that carbon production be assessed in Washington with the goal of reducing Washington's carbon emission footprint and Gov. Inslee's implementation task force seem to be in direct conflict with these projects. By allowing carbon based fuels to pass through Washington Ports increases in global carbon pollution will result. It must be considered a large increase in the State's carbon footprint. Has the task force's duties been considered when

concerning these projects? How will this project reconcile this increase in production with the states statutory goals to reduce Washington's contribution to the global carbon footprint?

Response O70-10

Refer to Chapter 3, Section 3.2.7.1, *Applicant Mitigation*, for proposed mitigation measures for air quality and greenhouse gas impacts. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment O70-11

Washington State has specific statutory requirements in regard to Coastal Marine Spatial Planning (CMSP) through entities such as the State Sea Caucus and Washington Coastal Marine Advisory Council. One key element of the statute is the requirement to "Protect and Preserve Existing Sustainable Uses." This is to ensure that new or expanded uses do not significantly impact existing marine uses. How is this project specifically addressing CMSP statutory requirements around new and expanded uses?

Response O70-11

Refer to the Master Response for Purpose and Focus of the EIS.

Comment O70-12

The statement "no flooding from sea level rise is predicted at the project site" would imply that sea level rise is not a potential problem. An overwhelming majority of climate scientist studies claim that catastrophic sea level rise is imminent. How high above sea level are these facilities? How was the no flood determination arrived at?

Response O70-12

Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts, Climate Change*, clarifies predictions of sea level change in the study area and potential flooding at the project site. With sea level rise in the study area predicted to be 1.57 feet by 2050, the project site will remain approximately 5 feet higher than the projected high tide. As such, it would not be subject to flooding even during extreme storm events.

Comment O70-13

The one remaining question the shellfish industry has is this. Could the responsible parties in this project provide surety bonds or some means of making available the potential cost of the damage that has a high degree of occurring? The guarantee or responsibility is what shellfish farmers and others who would be impacted by spills or explosions seek for both the short term and the more likely long term damage? Thank you for the opportunity to comment on the Westway and Imperium projects. The Willapa Grays Harbor Oyster growers Association is made up of Shellfish Growers and Processors from both Willapa Harbor and Grays Harbor working together to achieve common agricultural, environmental and educational goals.

Sincerely,

Ken Wiegardt
WGHOGA President

Response O70-13

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

O71, Willapa Hills Audubon Society, Charlotte Persons

Comment O71-1

Willapa Hills Audubon Society
P.O. Box 399
Longview, WA 98626

November 30, 2015

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

Dear sirs:

Willapa Hills Audubon Society is a National Audubon Society chapter in Southwest Washington. Our region is on both sides of the Lower Columbia River. In Oregon it includes part of Columbia County, and in Washington it includes Cowlitz, Wahkiakum, and Pacific County south of Raymond. For over forty years our chapter has been a force for protecting wildlife and the environment in our region. We thank you for the opportunity to comment on the Westway and Imperium Terminal Services Expansion projects in Grays River Harbor.

These proposals will create many dangers to humans along the railroad routes and in the city of Aberdeen, but our focus in these comments is on environmental risks to wildlife, especially species at risk.

There is unacceptable risk to wildlife from train accidents and derailments along the railroad route, from accidents transferring and storing oil at the port, and from collisions or malfunctions of oil tankers and tugs. No real mitigation or prevention is proposed in the DEIS. Because Grays River Harbor, the Chehalis River, and the coast both north and south of the harbor are excellent habitat for so many wildlife species, accidents in these areas would be especially damaging to the threatened species that live there. For this reason, Willapa Hills Audubon Society recommends that The City of Hoquiam and the Department of Ecology approve the NO ACTION alternative.

Response O71-1

Comment acknowledged.

Comment O71-2

Risks to Fish

Railroad accidents in the P&A route from Chehalis to the terminals:

Accident modelling in the DEIS shows that small spills are "likely" in transferring the oil to the ports along this railroad. In fact, in the last five years there have been six derailments along these tracks. These tracks cross many small streams and rivers and the proposed enlarged rail yard is along the protected Chehalis River Surge. While the DEIS considers that the risk of oil reaching these waterways is not likely in any given year, over the life of the project the chances are quite good. A study by Incardona et. al (2015) shows that even tiny amounts of oil can inhibit proper development of fish embryos, especially herring and protected species of salmon. In fact they suggest that this is why the Prince Edward fishery has not recovered since the Valdez accident in 1989. Even small amounts of oil from a spill will harm the fish species listed as protected in the DEIS—for years to come. Damage from a small spill would not be negligible for these protected species.

More important, the risk of a medium spill, the amount of one railroad car, is rated as close to "likely". In fact, derailment of one car will probably lead to more than one car derailing. Four out of five derailments of Bakken crude have led to fires and explosions—these in turn cause more cars to derail or rupture. The higher volatility of Bakken crude has not been factored into the DEIS's estimate of this risk. However, even if only part of the hundreds of gallons in a single railroad car reached these waterways, the threatened fish, and the wildlife that consume them, would be negatively affected for years.

Railroad accidents in the greater transport area:

The DEIS states that there will be higher risks of accidents that can affect wildlife in the greater transport area south of Chehalis, but that risk is not quantified. The route currently most favored is from Spokane to Vancouver and then along the Columbia River to Kelso and along I-5 north to Chehalis. This route traverses many water ways and is close to the Columbia River for dozens of miles. The DEIS should include calculations of the risk of accident along this and other rail routes, and the subsequent risk to fish and other wildlife in the waterways and in other habitat alongside the tracks. The DEIS should also require the same increases in training, equipment, and coordination of accidental oil spill or fire response for this route as it does for the P&A route.

Response O71-2

The approach to the analysis of risks in the study area is to consider different spill scenarios that could occur related to the proposed action. This is because as noted in Draft EIS Chapter 4, *Environmental Health and Safety*, a spill could occur at any location and at any time. Spill scenarios were chosen based on assumptions about terminal, rail, and vessel operations (as discussed in the Master Response for the Risk Assessment Methods) and locations where spills could occur more frequently, based on expert opinion, or result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, the discussion of impacts presented in Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances of an incident, the environmental impacts could be significant. For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer

to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

Comment O71-3

Risks to Birds

<u>Port Accidents:</u>

The oil risk model in the DEIS (Appendix N) shows that in any port accident, whether from transferring oil or rupture of an oil storage tank, large areas of the harbor would be oiled and the oil would go into the Pacific Ocean. This would be damaging to fish populations and to shorebirds. According to the oil risk model, threatened birds would be affected especially in two areas, Damon Point and Grays River Harbor Wildlife Refuge. Damon Point is a breeding area for Western Snowy Plover (Important Bird Areas 2001). The Western Snowy Plover is federally listed as threatened and state-listed as endangered (Western Snowy Plover 2014). Grays River Harbor Wildlife Refuge is one of four stopping areas on the west coast for migrating shorebirds. Millions of birds, one half of all migrating shorebirds in the western hemisphere, stop here during the fall and spring migration (Seasons of Wildlife 2012). If oil reached the shores of this sanctuary, no matter what the season, the resulting pressure on shore birds, already in decline, could push many of them into threatened status. Oil risk modelling in the DEIS shows that a medium-sized accident in transfer of oil, one oil tanker spilling into the bay, in summer would oil the beaches of both Damon Point and Grays River Wildlife Refuge.

Finally, the oil risk model used in the DEIS is based on incomplete data for the Chehalis River—NOAA estimates are used instead. This means that the modelling is inaccurate, and risks could be much greater than estimated. In addition to the areas shown to be affected in the models, two Important Bird Areas, recognized by the state of Washington, might also be oiled. Humptulips IBA is in the northern part of Grays River Harbor. It is mostly state land but includes areas owned by Grays River Audubon Society and Nature Conservancy. This area is important to migrating and native shorebirds and also supports fish, including the protected species listed in the DEIS. Elk River Important Bird area provides equally important fish and shorebird habitat, and includes the state of Washington's Elk River Natural Resources Conservation Area. According to the Department of Natural Resources website, "this area is the largest, highest quality estuarine system remaining in Washington or Oregon".

Response O71-3

Refer to the Master Response for Oil Spill Modeling Methods for more information regarding the purpose, approach, assumptions, scenarios, and inputs for oil spill modeling. Data used to model water flow in the Chehalis River were developed by reviewing the 61-year flow gauge record at U.S. Geological Survey Gage 12031000 Chehalis River at Porter, Washington, and the Chehalis Basin flood control project.

Draft EIS Chapter 4, Section 4.7.1.3, *Animals*, refers to impacts on animals and their habitats in the event of an oil spill.

Comment O71-4

<u>Tanker and Transport Tug Accidents:</u>

The DEIS modelling shows that during winter, a collision or malfunction at the mouth of Grays River Harbor would cause oiling to the south and would reach waters and shores of Willapa Bay, a state-recognized Important Bird Area, and possibly beyond. A collision during summer would cause oiling north along the Olympic Peninsula. The coast both north and south of Grays River Harbor harbors the same listed species as in Grays River Harbor as well as other species. For example, Western Snowy Plover at Leadbetter Point at the entrance to Willapa Bay might be affected by a winter accident, and all of the multiple Marine Protected Areas along the coast of the Olympic Peninsula would be destroyed by a summer accident.

Response O71-4

Comment acknowledged.

Comment O71-5

<u>Marbled Murrelet:</u>

One listed species that would be especially hard hit by an oil accident on the coast near Grays River Harbor is the Marbled Murrelet, a species in precipitous decline in Washington State (by 48% in the last eleven years), especially along the coast of Southwest Washington, where it is declining by 7% per year (Falxa and Raphael 2015). If the Southwest Washington population disappears, the northern populations in northern Washington, British Columbia and Alaska would be genetically isolated from the southern populations in Oregon and California. This genetic bottleneck could quickly lead to species extinction.

A further risk to Marbled Murrelet in Southwest Washington is mentioned in the DEIS besides those of oil spills in the harbor and along the coast; three critical habitat areas for Marbled Murrelet are along the P&A tracks, and in fact they make up 5% of the track area. There have been six derailments along this track in the last five years. If the terminal is used for 30 years, the chance of an accident in the Marbled Murrelet critical habitat areas is pretty high.

Response O71-5

Draft EIS Chapter 3, Section 3.5, *Animals,* addresses potential impacts of construction and routine operation of the proposed action on animals, including birds such as the marbled murrelet. Chapter

4, Section 4.7, *Impacts on Resources*, describes impacts that could result from potential spills, fires, or explosions. Section 4.7.1.3, *Animals*, *Sensitive Areas in the Study Area*, addresses potential impacts on critical habitat.

Comment O71-6

Mitigation

Most proposed mitigation efforts in the DEIS are "normal procedures" required by law in transporting, storing, and shipping oil. Principally, three measures have been proposed—a "voluntary" two-week cessation of vessel loading during the Grays Harbor shorebird festival, an invasive species monitoring plan, and underwater sound monitoring during pile-driving during construction. None are sufficient to address the risks to wildlife, especially from oil spills.

One proposed mitigation is particularly ineffective–the "voluntary" mitigation of a two-week stoppage of oil transfer during the Grays Harbor Audubon Society's Shorebird Festival each spring. As mentioned above, hundreds of thousands of shorebirds visit the Grays Harbor River estuary each year—it is one of four important stops for birds along the West Coast. The Shorebird Festival encompasses two weeks to serve the needs of people who come to celebrate the birds. It does not pretend to actually cover the entire concentrated migration period, which is usually three weeks. For those dates the DEIS should consult the U.S. Fish and Wildlife Service. In addition, the three-week period is the time of the highest concentration of birds in the Grays Harbor National Wildlife Refuge during spring, but there are many thousands of "stragglers" both before and after this short period. Also, the proposed voluntary mitigation does not take into account the fall migration, a much longer period over many months, which includes the same birds (Seasons of Wildlife 2012). A port accident during any time of the year would leave oil in the estuary that would affect plants, fish, and birds for years to come, so a two-week stoppage each year is not in any sense real mitigation.

<u>Other Possible Mitigation</u>

More effective prevention/mitigation for the Refuge might be a permanently installed protective oil boom across part of the major harbor inlet to the Refuge, or an oil boom that can be left in place on the shore and quickly installed within hours of a spill by specially trained state or Refuge employees.

We can imagine possibilities for other kinds of mitigation/prevention to decrease the risks to wildlife of the proposed project: the before-mentioned increased preparations for oil train accident response along the train route leading to Chehalis; rerouting trains around Marbled Murrelet critical habitat, away from the Chehalis River Surge, and away from the Columbia River; using smaller oil tankers to decrease the effects of collisions; increased preparations for cleaning up oil spills along the coast and in the harbor; and many more suggestions.

Response O71-6

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses the impacts associated with routine operations, including the potential for incidental spills. As noted in Section 3.5, *Animals*, the potential for widespread environmental damage related to the risk of oil spills, fires, and explosions is addressed in Chapter 4, *Environmental Health and Safety*. Therefore, mitigation measures to address potential impacts from the increased risk of oil spills, fires, or explosions are proposed in Chapter 4. As noted, these measures would help to reduce potential impacts on the environmental resources in the study area. Nonetheless, mitigation would not completely eliminate

the possibility of an incident. Depending on the specific circumstances of an incident, the environmental impacts could be significant.

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification.

Comment O71-7

Conclusion

However, substantive mitigation and prevention strategies are noticeably absent from this DEIS. Again and again the DEIS documents increased risks to humans and wildlife of transporting, storing and shipping Bakken crude oil to the proposed terminals, but no real prevention or mitigation is offered.

The State of Washington and its commercial businesses have a duty to protect this special area which is so important to endangered fish and birds, as well as a duty to protect humans living and working along the train tracks and in the Grays Harbor area.

The risks from transporting and storing oil at these proposed oil terminals in Grays River Harbor are described in the DEIS as moderately likely to likely, and there is an absence of any real prevention or mitigation. This is the basis of Willapa Hill Audubon Society's recommendation of NO ACTION ALTERNATIVE.

Sincerely,

Charlotte Persons
Conservation Co-Chair

References

Elk River Natural Resources Conservation Area. 2015. http://www.dnr.wa.gov/elk-river-natural-resources-conservation-area

Falxa, Gary A. and Raphael, Martin G. 2015. Technical Coordinators. Northwest Forest Plan?The First Twenty Years (1994-2013): Status and Trend of Marbled Murrelet Populations and Nesting Habitat. Draft 26 May 2015. Northwest Forest Plan Interagency Regional Monitoring Program. http://www.reo.gov/monitoring/reports/20yr-report/MAMU%20GTR_for%20posting_26May2015.pdf

Imperium Renewables proposal. Draft Environmental Impact Statement. 2015. Washington Department of Ecology. http://www.ecy.wa.gov/geographic/graysharbor/imperiumterminal.html

Important Bird Areas of Washington. 2001. AudubonWashington. Olympia. Washington. http://wa.audubon.org/sites/default/files/documents/iba-1-50_pacific_coast.pdf

Incardona, John P. et al. (2015). Very low embryonic crude oil exposures cause lasting cardiac defects in salmon and herring. Nature. Scientific Reports. 8 September 2015.

https://onedrive.live.com/view.aspx?cid=3b1b4f937f58abbf&page=view&resid=3B1B4F937F58ABBF!27209&parId=3B1B4F937F58ABBF!27205&authkey=!AIwcq8la7CE8uNU&app=WordPdf

Seasons of Wildlife. 2012. Grays Harbor National Wildlife Refuge. http://www.fws.gov/refuge/Grays_Harbor/seasons_of_wildlife/

Western Snowy Plover. 2014. U.S. Fish and Wildlife. http://www.fws.gov/arcata/es/birds/WSP/plover.html

Westway Expansion Projects. Draft Environmental Impact Statement. 2015. Washington Department of Ecology. http://www.ecy.wa.gov/geographic/graysharbor/westwayterminal.html

Response O71-7

Comment acknowledged.

Chapter 6
General Public

The individuals listed in Table 6-1 submitted comments on the Draft EIS. These comments and responses to those comments are presented after the table. Master responses were developed to address commonly raised comments and are presented in Chapter 2, *Comment Themes and Master Responses*.

The responses refer to the Draft EIS unless information has been revised, in which case the Final EIS is specified.

Table 6-1. Comment Letters Submitted by Individuals

Number	Name
GP-1	Abramson, Mary
GP-2	Abramson, Mary
GP-3	Ackerman, Laura
GP-4	Adams, Bill
GP-5	Albert, Donna
GP-6	Albert, Donna
GP-7	Albert, Donna
GP-8	Albert, Donna
GP-9	Albert, Donna
GP-10	Albert, Donna
GP-11	Albert, Donna
GP-12	Albert, Donna
GP-13	Albert, Donna
GP-14	Albert, Donna
GP-15	Albert, Donna
GP-16	Albert, Donna
GP-17	Albert, Donna
GP-18	Albert, Donna
GP-19	Albert, Donna
GP-20	Albert, Donna
GP-21	Albert, Donna
GP-22	Albert, Donna
GP-23	Albert, Donna
GP-24	Albert, Donna
GP-25	Albert, Donna
GP-26	Albert, Donna
GP-27	Alderton, Janet
GP-28	Allee, Pamela
GP-29	Alwood, David
GP-30	Ammann, Harriet

Number	Name
GP-31	Anderson, Denise
GP-32	Anderson, Gary
GP-33	Anderson, Glen
GP-34	Anderson, Glen
GP-35	Andrews, Susan
GP-36	Armley, Jeff
GP-37	Armley, Jeffrey
GP-38	Armstrong, Jude
GP-39	Ashby, Crandall
GP-40	Ashby, Dan
GP-41	Ashby, Dave
GP-42	Ashby, Ken
GP-43	Ashby, Nicholas
GP-44	Ashby, Steve
GP-45	Atkinson, Kim
GP-46	Attermann, Rein
GP-47	Autrey-Schell, Yovonne
GP-48	Avery, Jean
GP-49	Avery, Jean
GP-50	Avery, Jean
GP-51	Avery, Jean
GP-52	Avery, Jean
GP-53	Avery, Jean
GP-54	Avery, Jean
GP-55	Avery, Jean M.
GP-56	Bachelder, Karen
GP-57	Baker, Brandon
GP-58	Ballo, Dennis and Julie
GP-59	Ballo, Kristi
GP-60	Ballo, Mark
GP-61	Ballo, Mark
GP-62	Barkhurst, Ross
GP-63	Barkhurst, Ross
GP-64	Bassett, Beverly
GP-65	Bayer, John
GP-66	Beattie, Will
GP-67	Beckley, Diane
GP-68	Bedall, Frank H.
GP-69	Bell, Sherri
GP-70	Bellamy, Patricia
GP-71	Berger, David
GP-72	Berman, Lowen

Number	Name
GP-73	Bernard, Judith
GP-74	Beugli, David
GP-75	Bigelow, Bill
GP-76	Black, Barbara Jean
GP-77	Blackbird, Marles
GP-78	Bo, Bri
GP-79	Boatsman, Carolyn
GP-80	Bock, Christian
GP-81	Bock, Christian
GP-82	Bodding, Jim
GP-83	Boland, Brice
GP-84	Bold, Molly
GP-85	Boonstra, John
GP-86	Borso, Pam
GP-87	Bossard, Pat
GP-88	Bossard, Pat
GP-89	Bougher, Thomas
GP-90	Bougher, Thomas
GP-91	Bougher, Tom
GP-92	Bougher, Tom
GP-93	Brake, William
GP-94	Brake, William
GP-95	Brake, William
GP-96	Brake, William
GP-97	Brake, William
GP-98	Brake, William
GP-99	Brake, William
GP-100	Brake, William
GP-101	Branshaw, Jon
GP-102	Brantner, Maren
GP-103	Bray, Karen
GP-104	Breuer, Sandra
GP-105	Broadus, Jerry
GP-106	Brockway, Abby
GP-107	Brooke, Phillip
GP-108	Brosman, Wes
GP-109	Brosman, Wes
GP-110	Brown, Keith and Teresa Robbins
GP-111	Brown, Ray
GP-112	Brown, Ray
GP-113	Brown, Ray
GP-114	Brownell, Basilia

Number	Name
GP-115	Browning, Linda
GP-116	Bruton, Peggy
GP-117	Bruton, Peggy
GP-118	Burgoon, Susan
GP-119	Burke, Denise
GP-120	Burnes, Thomas
GP-121	Burns, Daniel
GP-122	Bussmann, Krissy
GP-123	Butler, Quinn
GP-124	Callos, Duane
GP-125	Campbell, Kevin
GP-126	Campbell, Rebecca
GP-127	Campbell, Rebecca
GP-128	Cannady, David
GP-129	Canny, Maureen
GP-130	Capozzelli, J
GP-131	Carlson, Joel
GP-132	Carlson, Joel
GP-133	Carol
GP-134	Carter, Al
GP-135	Carter, Albert
GP-136	Carter, Judy
GP-137	Cates, Eddy
GP-138	Chapin, David
GP-139	Chappell, Lisa
GP-140	Chappell, Lisa
GP-141	Chappell, Lisa
GP-142	Chappell, Lisa
GP-143	Chappell, Lisa
GP-144	Chappell, Lisa
GP-145	Chappell, Lisa
GP-146	Chappell, Lisa
GP-147	Chappell, Lisa
GP-148	Chappell, Lisa
GP-149	Cheatham, North
GP-150	Christ, Peter
GP-151	Chudy, Cathryn
GP-152	Clark, Dan
GP-153	Clark, Sharon
GP-154	Clark, Sheri
GP-155	Clarkson, Jim
GP-156	Clendenin, The Rev. Evan Graham

Number	Name
GP-157	Clifford, Margaret
GP-158	Cochran, Julia
GP-159	Cole, Robert
GP-160	Connally, Patricia
GP-161	Connor, Robert
GP-162	Cool, Debbie
GP-163	Cornelison, Peter
GP-164	Corr, Nancy
GP-165	Covert-Bowlds, Chris
GP-166	Cozzetto, Bonnie
GP-167	Crawford, Dennis
GP-168	Crawford, Dennis PhD
GP-169	Culhane, Tom
GP-170	Cummings, Roger
GP-171	Cunningham, Lynda
GP-172	Curry, Stephen
GP-173	Curtz, Thad
GP-174	D, Dave
GP-175	Dahlquist, Brynn
GP-176	Dahlquist, Daeuthen
GP-177	Dale, Garry
GP-178	Dale, Garry
GP-179	Dale, Garry
GP-180	Damike, Tammy
GP-181	Davis, Edith
GP-182	Davis, Kelley
GP-183	Davis, Major Tom E.
GP-184	Davis, Tom
GP-185	Dawning, Desdra
GP-186	Day, John
GP-187	Dayton, Gary
GP-188	Deakin, Dave
GP-189	Denison, Marcia
GP-190	Dennehy, Casey
GP-191	Dennehy, Casey
GP-192	Dickason, Pat
GP-193	Dickerson, Michael
GP-194	Dickerson, Michael
GP-195	Dietz, Kimberly
GP-196	Dilsaver, Erin
GP-197	Dilworth, Erin
GP-198	Dolph, Phyllis

Number	Name
GP-199	Domike, Tammy
GP-200	Doull, Bryan
GP-201	Downing, Beulah
GP-202	Drumheller, Susan
GP-203	Dunlap, Fredric
GP-204	Durr, Becky
GP-205	Durr, Rebecca
GP-206	Durr, Rebecca
GP-207	Dye, Jessie
GP-208	Dye, Jessie
GP-209	Eachus, Ann
GP-210	Eddington, Marianne
GP-211	Edwards, David
GP-212	Edwards, Karen
GP-213	Edwards, Rose
GP-214	Ellingboe, Linda
GP-215	Ellis, E.
GP-216	Ellis, Liz
GP-217	Engel, Kim
GP-218	Engvall, Brady
GP-219	Engvall, Brady
GP-220	Engvall, Brady
GP-221	Engvall, Korry
GP-222	Engvall, Luella
GP-223	Estalilla, Francis
GP-224	Estalilla, Francis
GP-225	Evans, Susan
GP-226	Fargo, Rich
GP-227	Farra, Jackie
GP-228	Farrell, Jenny
GP-229	Feltham, Wendy
GP-230	Ferguson, Ken
GP-231	Ferguson, Ken
GP-232	Ferra, Jackie
GP-233	Ferraro, Natalie
GP-234	Ferraro, Natalie
GP-235	Figlan-Barnes, Jarred
GP-236	Figlar-Barnes, Jarred
GP-237	Figlar-Barnes, Kim
GP-238	Figlar-Barnes, Ron
GP-239	Figlar-Barnes, Ron
GP-240	Finke, Jeanne

Number	Name
GP-241	Finke, Jeanne
GP-242	Fjachie, Craig
GP-243	Ford, Robert
GP-244	Ford, Robert
GP-245	Forster, Charles
GP-246	Francy, Joshua
GP-247	Franklin, Teri
GP-248	Franklin, Teri J.
GP-249	Freiberg, Pat
GP-250	Freiberg, Pat
GP-251	Freiberg, Patricia
GP-252	Freund, Sylvia
GP-253	Fuquay, Anita
GP-254	Garnett, Kathryn
GP-255	Gere, Susan
GP-256	Gervais, Anthony
GP-257	Gesseit, Kate
GP-258	Gibbs, Virginia
GP-259	Giddings, Roxy
GP-260	Giddings, Roxy
GP-261	Giesler, Sheila
GP-262	Gilmore, Thomas
GP-263	Goldberg, R. David
GP-264	Goldberg, R. David
GP-265	Goldberg, R. David
GP-266	Goldberg, R. David
GP-267	Goldberg, R. David
GP-268	Goldberg, R. David
GP-269	Golde, Hellmut and Marcy
GP-270	Golde, Hellmut and Marcy
GP-271	Golding, Will
GP-272	Gooding, David
GP-273	Gordon, Diana
GP-274	Gordon, Diana
GP-275	Gordon, Diana
GP-276	Gordon, Diana
GP-277	Gordon, Diana
GP-278	Gordon, Diana
GP-279	Gordon, Diana
GP-280	Gordon, Diana
GP-281	Gordon, Don
GP-282	Gordon, Frank

Number	Name
GP-283	Gordon, Frank
GP-284	Gordon, Frank
GP-285	Gordon, Pat
GP-286	Gordon, Thomas
GP-287	Gordon, Thomas
GP-288	Gordon, Thomas
GP-289	Gordon, Thomas
GP-290	Gordon, Thomas
GP-291	Gordon, Thomas
GP-292	Gordon, Thomas
GP-293	Grace, Lise
GP-294	Graham, Bill
GP-295	Graham, Bill
GP-296	Graham, William
GP-297	Graham, William
GP-298	Grant, Brenda
GP-299	Graser-Lindsey, Elizabeth
GP-300	Greef, Fred
GP-301	Green, Richard
GP-302	Greenridge, Connie
GP-303	Greenridge, Connie
GP-304	Greenridge, Frederick
GP-305	Grellier, Penny
GP-306	Grossman, Zoltan
GP-307	Grossman, Zoltan
GP-308	Grundbaum, Arthur
GP-309	Grundbaum, Arthur
GP-310	Grundbaum, Arthur
GP-311	Hale, Dave
GP-312	Hamilton, Tim
GP-313	Hancock, Ray
GP-314	Hansen, Elizabeth
GP-315	Hardesty, Alice
GP-316	Hargrove, Bourtai
GP-317	Hargrove, Bourtai
GP-318	Hargrove, Bourtai
GP-319	Harlan
GP-320	Harlan
GP-321	Harris, Clairmonde
GP-322	Harris, Maury
GP-323	Hartwell, Beth
GP-324	Harty, Florence

Number	Name
GP-325	Hatley, Dave
GP-326	Hauck, Robert
GP-327	Havrilak, George
GP-328	Hayes, Glenna
GP-329	Haywood, Susan
GP-330	Haywood, Susan
GP-331	Helen
GP-332	Hepp, Helen
GP-333	Hepp, Helen
GP-334	Herbert, Emily
GP-335	Hesse, Ilsa
GP-336	Heverly, Craig
GP-337	Hightower, Michael
GP-338	Hightower, Mike
GP-339	Hildreth, Joan
GP-340	Hilke, Deborah
GP-341	Hoeft, Bruce
GP-342	Hoeft, Bruce
GP-343	Holcomb, Peter
GP-344	Holden, Madronna
GP-345	Holder, Lehman
GP-346	Holder, Mary
GP-347	Holm, Patricia
GP-348	Holz, Thomas
GP-349	Howe, David
GP-350	Hughes, Nelson
GP-351	Humphrey, John
GP-352	Hunter, Rhonda
GP-353	Hunter, Rhonda
GP-354	Hunter, Rhonda
GP-355	Inskeep, Terry
GP-356	Isaacson, Tom
GP-357	Jackson, Aria
GP-358	Jacobson, Don
GP-359	Jaeger, Michael
GP-360	Jamison, Robert
GP-361	Johnson, Ali
GP-362	Johnson, Marjorie
GP-363	Johnson, Mary K.
GP-364	Johnston, Robert.
GP-365	Jordan, Janet
GP-366	Jordan, Janet

Number	Name
GP-367	Jordan, Janet
GP-368	Jordan, Yvonne
GP-369	Julius, Theressa
GP-370	Justis, Bill
GP-371	Kachman, Kati
GP-372	Kaiyala, Julie
GP-373	Kaplan, Robert B.
GP-374	Keefe, George
GP-375	Keefe, George
GP-376	Kempfer, Wes
GP-377	Kenney, Pat
GP-378	Kersting, John
GP-379	Kersting, John
GP-380	Kipnis, Hinda
GP-381	Kircher, Marjorie
GP-382	Kircher, Marjorie
GP-383	Kirk, Ruth
GP-384	Kocer, Dianne
GP-385	Kocer, Dianne
GP-386	Kocer, Dianne
GP-387	Kolberg, Dave
GP-388	Krueger, Katherine
GP-389	Lacefield, Lily
GP-390	LaDuca, Kimberly
GP-391	LaDuca, Kimberly
GP-392	Langley, Veronica
GP-393	Lanz, James
GP-394	Lanz, James
GP-395	Larson, Carrie
GP-396	Larson, Don
GP-397	Larson, Donald A.
GP-398	Larson, Erik
GP-399	Larson, John
GP-400	Larson, Ralph
GP-401	Leed, Mark
GP-402	Lenigan, Rosemary
GP-403	Leon, Carmen
GP-404	Levy, Cindy
GP-405	Levy, Cindy
GP-406	Lewis, Twila
GP-407	Liebaum, Ellen
GP-408	Linn, David

Number	Name
GP-409	Linn, David
GP-410	Linnell, Kathy
GP-411	Lish, Christopher
GP-412	Livella, Therese
GP-413	Livella, Therese
GP-414	Livella, Therese
GP-415	Livella, Therese
GP-416	Livella, Therese
GP-417	Longley, A
GP-418	Lucas, Betty
GP-419	Luck, Vickie
GP-420	Lybarger, Lisa
GP-421	Lyons, Mary
GP-422	MacLeod, Paul
GP-423	MacLeod, Paul
GP-424	Majar, Mary Ann
GP-425	Mallard, Tom
GP-426	Mann, Cherri
GP-427	Mann, Cherri
GP-428	Marks, Griffith
GP-429	Maron-Oliver, Dani
GP-430	Marthaller, John
GP-431	Martin, Arnie
GP-432	Martin, Arnie
GP-433	Martin, Arnie
GP-434	Martin, Arnie
GP-435	Martin, Arnie
GP-436	Martin, Meredith
GP-437	Mascarenas, David
GP-438	Mascarenas, David
GP-439	Mather, Linda
GP-440	Mayton, Leona
GP-441	McCarthy, Sally
GP-442	McCrummen, JB
GP-443	McCuen, Annie
GP-444	McKinlay, Bonnie
GP-445	McLachlan, Pat
GP-446	McLachlan, Pat
GP-447	McLachlan, Pat
GP-448	McManus, Tony
GP-449	McMurray, Maureen
GP-450	McVaugh, Skyler

Number	Name
GP-451	Meacham, Michael
GP-452	Megargle, Paul
GP-453	Mergler, Gerald
GP-454	Mergler, Gerald
GP-455	Mergler, Gerald
GP-456	Mergler, Gerald
GP-457	Mergler, Gerald
GP-458	Messmer, Louis
GP-459	Messmer, Louis
GP-460	Messmer, Louis
GP-461	Messmer, Louis
GP-462	Messmer, Louis
GP-463	Meyer, Bonnie
GP-464	Meyer, John
GP-465	Meyer, Jon
GP-466	Meyer, Jon
GP-467	Meyer, William
GP-468	Michslek, David
GP-469	Milholland, David M.
GP-470	Miller, Bev
GP-471	Miller, Dave
GP-472	Miller, Sharon
GP-473	Miller, Sharon
GP-474	Miller, Sharon
GP-475	Miller, Sharon
GP-476	Miller, Sharon
GP-477	Mintkeski, Walt
GP-478	Mizutani, Patricia
GP-479	Mohr, Brian
GP-480	Moore, Dianna
GP-481	Moore, Julia
GP-482	Moore, Julia
GP-483	Moore, Robin
GP-484	Moore, Robin
GP-485	Moore, Robin
GP-486	Moore, Robin
GP-487	Moore, Robin
GP-488	Moore, Robin
GP-489	Moore, Robin
GP-490	Moore, Robin
GP-491	Moore, Robin
GP-492	Moore, Robin

Number	Name
GP-493	Moore, Robin
GP-494	Moore, Robin
GP-495	Moore, Robin
GP-496	Moore, Robin
GP-497	Moore, Robin
GP-498	Morabito, Joan
GP-499	Mossett, Kandi
GP-500	Murphy, Donna
GP-501	Murr, Bobbee
GP-502	Murrell, Gary
GP-503	Murrell, Gary
GP-504	Myhre, Rebecca
GP-505	Newsome, Dave
GP-506	Nickell, Aaron
GP-507	Nightingale, Terry
GP-508	Nobles, Carrie
GP-509	Norgren, Tim
GP-510	Norton, Sonya
GP-511	Nugent, Virginia
GP-512	O'Connor, Jenny
GP-513	O'Hanley, Kelly
GP-514	Olson, Jean
GP-515	Opfer, Warren
GP-516	Opfer, Warren
GP-517	Orgel, Linda
GP-518	Orgel, Linda
GP-519	Orgel, Linda
GP-520	Parker, Camille
GP-521	Parks, Carrie
GP-522	Parks, Carrie
GP-523	Parks, Carrie
GP-524	Patton, Kathleen
GP-525	Patton, Kathleen
GP-526	Paulson, Lauri
GP-527	Paynter, Mary
GP-528	Paynter, Mary
GP-529	Pelly, Mike
GP-530	Pelo, Ann
GP-531	Pennant, Sandie
GP-532	Penry, Marlene
GP-533	Penry, Marlene
GP-534	Penry, Marlene

Number	Name
GP-535	Penry, Marlene
GP-536	Penry, Marlene
GP-537	Penry, Marlene
GP-538	Penry, Marlene
GP-539	Penry, Marlene
GP-540	Penry, Marlene
GP-541	Penry, Marlene
GP-542	Penry, Marlene
GP-543	Penry, Marlene
GP-544	Penry, Marlene
GP-545	Penry, Marlene
GP-546	Penry, Marlene
GP-547	Penry, Marlene
GP-548	Penry, Marlene
GP-549	Penry, Marlene
GP-550	Penry, Marlene
GP-551	Penry, Marlene
GP-552	Penry, Marlene
GP-553	Penry, Marlene
GP-554	Penry, Marlene
GP-555	Penry, Marlene
GP-556	Penry, Marlene
GP-557	Penry, Marlene
GP-558	Penry, Marlene
GP-559	Perk, David
GP-560	Perk, David
GP-561	Perk, David
GP-562	Perk, David
GP-563	Perk, David
GP-564	Perk, David
GP-565	Perk, David
GP-566	Perrotti, Edward
GP-567	Perrotti, Edward
GP-568	Perrotti, Edward
GP-569	Perrotti, Edward
GP-570	Perry, C.E.
GP-571	Pfeiler, Ben
GP-572	Pfeiler, Nancy
GP-573	Pickering, Karen
GP-574	Plackett, Mark
GP-575	Plunkett, Jim
GP-576	Pokorny, Tamara

Number	Name
GP-577	Pout, Rozanne
GP-578	Powell, Mark
GP-579	Prentiss, Alex
GP-580	Prentiss, Geoff
GP-581	Proctor, Gary
GP-582	Quigg, John
GP-583	Rabaglia, Melanie
GP-584	Ramos, Jean
GP-585	Rapp, Fred
GP-586	Rast, Darrel
GP-587	Rathbone, Lora
GP-588	Rattie, Marcella
GP-589	Ray
GP-590	Ray, Barbara
GP-591	Reames, S & J
GP-592	Regan, Danna
GP-593	Rhodes, Dusty
GP-594	Rhodes, Dusty
GP-595	Rhodes, Dusty
GP-596	Rhodes, Dusty
GP-597	Rhodes, Dusty
GP-598	Richrod, Alan
GP-599	Richrod, Alan
GP-600	Rickman, Sharon
GP-601	Riley, Mary
GP-602	Ritter, John
GP-603	Ritter, John
GP-604	Robertson, Joelle
GP-605	Robinson, Cheryl, BSN, RN
GP-606	Robinson, Joelle
GP-607	Robinson, Michael
GP-608	Rolf, Margo
GP-609	Roos, Tedine
GP-610	Rose, Carol
GP-611	Rose, Shawn
GP-612	Rosen, David
GP-613	Ross, Elizabeth
GP-614	Rouse-Wilson, Bonnie
GP-615	Ruth, Maria
GP-616	Ruth, Maria
GP-617	Ruyle, Susan
GP-618	Sakai, Eugene

Number	Name
GP-619	Sandwell, Susan
GP-620	Sandwell, Susan
GP-621	Scavezze, Barb
GP-622	Scavezze, Barbara
GP-623	Schaeffer, Kathleen
GP-624	Schaeffer, Kathleen
GP-625	Schaeffer, Kathy
GP-626	Schaeffer, Kathy
GP-627	Schmid, Alice Marie
GP-628	Scholzen, R.
GP-629	Schramm, Richard
GP-630	Schultz, Chuck
GP-631	Schultz, Nancy
GP-632	Schumacker, Joe
GP-633	Schwartz, Susan
GP-634	Schwarzenback, Marian
GP-635	Schwickerath, Dean
GP-636	Seaman, Carol
GP-637	Seaman, Carol
GP-638	Seaman, Carol
GP-639	Seaman, Carol
GP-640	Seaman, Carol
GP-641	Seaman, Carol
GP-642	Segretti, Fiona
GP-643	Seiler, David
GP-644	Seiler, David
GP-645	Seiler, Katherine and David
GP-646	Seiler, Kathy
GP-647	Serres, Dan
GP-648	Serres, Dan
GP-649	Serres, Dan
GP-650	Shafer, Sarah
GP-651	Shaleen
GP-652	Shapiro, Alice
GP-653	Shapiro, Howard
GP-654	Shapiro, Howard
GP-655	Sharpe, Elaine
GP-656	Sheats, Melanie
GP-657	Shelman, Dave
GP-658	Sherdahl, Eric
GP-659	Sherdahl, Judy
GP-660	Sherman, Rhonda

Number	Name
GP-661	Sherman, Russell
GP-662	Sherman-Peterson, Ronald
GP-663	Shillinger, Barb
GP-664	Shillinger, Lamont
GP-665	Shober, Harlan
GP-666	Shubert, Stephen
GP-667	Simone, Dorthea
GP-668	Sims, Kimberly
GP-669	Sinclair, Sheri
GP-670	Skinner, Cate
GP-671	Skinner, Kate
GP-672	Skinner, Wayne
GP-673	Smith, Al
GP-674	Smith, Al
GP-675	Smith, Jeff
GP-676	Smith, Joyce
GP-677	Smith, Joyce
GP-678	Snyder, Jeff
GP-679	Soares, Jared
GP-680	Soden, Mary
GP-681	Solomon, Laurie
GP-682	Soman, Michael
GP-683	Sommers, Louis
GP-684	Sowers, Jeff
GP-685	Spalding, Shelly
GP-686	Speltz, Greg
GP-687	Spike, Wilma
GP-688	Stanoway, Ed
GP-689	Stearns, Christopher
GP-690	Steege, Theodore
GP-691	Steinke, Alana
GP-692	Steinke, Alona
GP-693	Steinke, Don
GP-694	Steinke, Don
GP-695	Steinke, Don
GP-696	Steinke, Don
GP-697	Steinke, Don
GP-698	Steinke, Don
GP-699	Steinke, Don
GP-700	Steinke, Don
GP-701	Steinke, Don
GP-702	Steinke, Don

Number	Name
GP-703	Steinke, Don
GP-704	Steinke, Don
GP-705	Steinke, Don
GP-706	Steinke, Don
GP-707	Steinke, Don
GP-708	Steinke, Don
GP-709	Steinke, Don
GP-710	Steinke, Don
GP-711	Steinke, Don
GP-712	Steinke, Don
GP-713	Steinke, Don
GP-714	Steinke, Don
GP-715	Steinke, Don
GP-716	Steinke, Don
GP-717	Steinke, Don
GP-718	Steinke, Don
GP-719	Steinke, Don
GP-720	Steinke, Don
GP-721	Steinke, Don
GP-722	Steinke, Don
GP-723	Steinke, Don
GP-724	Steinke, Don
GP-725	Steinke, Don
GP-726	Steinke, Don
GP-727	Steinke, Don
GP-728	Steitz, Jim
GP-729	Stenger, Joseph
GP-730	Stepp, Patricia Joy
GP-731	Sterr, William
GP-732	Stokam
GP-733	Stonington, Louise
GP-734	Stormo, Paul
GP-735	Street, Nancy
GP-736	Street, Nancy
GP-737	Street, Nancy
GP-738	Street, Nancy
GP-739	Streiffert, Dan
GP-740	Strid, Eric
GP-741	Strid, Eric
GP-742	Strong, Janet
GP-743	Strong, Janet
GP-744	Strump, Larry

Number	Name
GP-745	Stuckert, Ben
GP-746	Sturdivant, Lee
GP-747	Sunde, Carol
GP-748	Sunshine, Susan
GP-749	Sunshine, Susan
GP-750	Sunshine, Susan
GP-751	Suter, Alice
GP-752	Swanson, Steve
GP-753	Swartz, Marilyn
GP-754	Swett, Michael
GP-755	Sword, Carol
GP-756	Sword, Carol
GP-757	Taylor, Robert
GP-758	Teneau, Peter
GP-759	Tharp, Rod
GP-760	Tharp, Rod
GP-761	Tharp, Rod
GP-762	Tharp, Rod
GP-763	Tharp, Rod
GP-764	Tharp, Rod
GP-765	Thevik, Karen Olivia
GP-766	Thevik, Karen Olivia
GP-767	Thevik, Karen Rae
GP-768	Thevik, Karen Rae
GP-769	Thevik, Maxwell
GP-770	Thomas, Anita
GP-771	Thomas, Jan
GP-772	Thompson, Carey
GP-773	Thompson, Sherrie
GP-774	Thrun, Nina
GP-775	Thrun, Nina
GP-776	Thurman, Mickey
GP-777	Tibbets, Ron
GP-778	Tieger, Joseph
GP-779	Tim
GP-780	Tinnerstet, Darryl
GP-781	Tinnerstet, Darryl
GP-782	Tlustos, Margaret
GP-783	Tomlinson, Marc R.
GP-784	Treadway, Carolyn
GP-785	Treadway, Roy
GP-786	Treat, Lynn

Number	Name
GP-787	Troyer, Stena
GP-788	Tuepker, Anais
GP-789	Tuyls, Gar
GP-790	Tuyls, Gar
GP-791	Tuyls, Gar
GP-792	Upenieks, Roland
GP-793	Van Doorninck, Anneka
GP-794	Vanderpool, Nancy
GP-795	Vassilakis, Noemie
GP-796	Vicki
GP-797	Vicki
GP-798	Vidal-Hallett, Emilia
GP-799	Vogel, Sally
GP-800	Voget, Connie
GP-801	Voget, Connie
GP-802	Voget, Richard
GP-803	Voget, Richard
GP-804	Vogt, Max
GP-805	Walberg, Patrick
GP-806	Waldorf, Elizabeth
GP-807	Waley, Valerie
GP-808	Walker, R.P.
GP-809	Wallace, Nadine
GP-810	Walsh, Rebecca
GP-811	Wang, Art
GP-812	Ward, Marian
GP-813	Warren, Richard
GP-814	Warren, Richard
GP-815	Water, Mary
GP-816	Watkins, Eric
GP-817	Watson, Mik
GP-818	Webb, Marty
GP-819	Webb, Mike
GP-820	West, Ashley
GP-821	Wetter, Margaret
GP-822	Wetzel, Paul
GP-823	Wichar, Den Mark
GP-824	Wichar, Den Mark
GP-825	Wilbert, Ed C.
GP-826	Wild, Noah
GP-827	Williams, Donald
GP-828	Williams, Imogene

Number	Name
GP-829	Williams, Imogene
GP-830	Williams, Imogene
GP-831	Williams, Steve
GP-832	Willis, Jeffrey
GP-833	Wilmering, Kathy
GP-834	Wilson, David
GP-835	Wilson, Don
GP-836	Wilson, Richard L.
GP-837	Winn, Diane
GP-838	Wireman, Ginger
GP-839	Wolfe, Diane
GP-840	Wolfe, Diane
GP-841	Wolfe, Diane
GP-842	Wolfe, Diane
GP-843	Wolfe, John
GP-844	Wolff, Virginia
GP-845	Wolff, Virginia
GP-846	Wonhoff, Taylor
GP-847	Wood, John and Polly
GP-848	Wood, Sandy
GP-849	Wood, Sandy
GP-850	Woods, Keith
GP-851	Woodward-Rice, Claudia
GP-852	Woodward-Rice, Claudia
GP-853	Young, Robert
GP-854	Young, Saphronia
GP-855	Yun, Christine
GP-856	Zeigler, Bob
GP-857	Zeigler, Bob
GP-858	Zeigler, Bob
GP-859	Zeigler, Bob
GP-860	Zeller, Nick
GP-861	Ziggy
GP-862	Ziggy
GP-863	Zimmer, Doug
GP-864	Zimmer, Doug
GP-865	Zimmerman, Robert
GP-866	Zora, Craig
GP-867	Zora, Craig
GP-868	Zora, Craig
GP-869	Zora, Craig
GP-870	Anonymous

Number	Name
GP-871	Anonymous
GP-872	Anonymous
GP-873	Anonymous
GP-874	Anonymous
GP-875	Anonymous
GP-876	Anonymous
GP-877	Anonymous
GP-878	Anonymous
GP-879	Anonymous
GP-880	Anonymous
GP-881	Anonymous
GP-882	Anonymous
GP-883	Anonymous
GP-884	Anonymous
GP-885	Anonymous
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GP-887	Anonymous
GP-888	Anonymous
GP-889	Anonymous
GP-890	Anonymous
GP-891	Anonymous
GP-892	Anonymous
GP-893	Anonymous
GP-894	Anonymous
GP-895	Anonymous
GP-896	Anonymous
GP-897	Anonymous
GP-898	Anonymous
GP-899	Anonymous
GP-900	Anonymous
GP-901	Anonymous
GP-902	Anonymous

GP1, **Abramson, Mary**

Comment GP1-1

How can you minigate if the children at Horizon Elem. are incinerated! The State gov. is to protect our 'right to life' and make sure we are 'safe' and 'happy'. This state should have called a moratorium on any shipments of the volatile Bakken oil through our state when 47 people were incinerated in Quebec. Who amongst you will speak out to the governor and others who are 'pushing' this insanity into our state!

Response GP1-1

Comment acknowledged.

GP2, Abramson, Mary

Comment GP2-1

[Attachment: Letter to Governor Inslee]

Response GP2-1

Comment acknowledged. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP3, Ackerman, Laura

Comment GP3-1

Good evening. Thank you for this opportunity to speak. I'm Laura Ackerman. I'm from Spokane. And my office is in downtown Spokane. It's 500 of my steps to the tracks, which is in the U.S. DOT blast zone.

These trains to the Grays Harbor facility will come through the Spokane area. We get all of the rail traffic for Grays Harbor. Not only, like I said, just Grays Harbor, but we get it for all of the post facilities and the refineries. And the DEIS needs to look at the rail transportation holistically and not just facility by facility when it comes to the impacts in the Spokane area.

And the facilities that I am commenting on, and these are for both projects, create unmitigatable risks for Spokane and our river. We have declining need of rent-bound trout, we have a lot of populations, including the Spokane tribe, several others who live sustainably from the river. We have an EPA sole source drinking aquifer that intermingles in the river. It's recharged in part from Lakes Coeur d'Alene and Pend Oreille. And a spill in the Pend Oreille into the lake would impact our aquifer. It's all connected.

And a spill and fire would devastate Spokane's downtown, the Spokane Valley, and it would virtually wipe out the city of Cheney.

Response GP3-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Comment GP3-2

We had a brutal year in Eastern Washington with all the fires, and I mean brutal. It was unbearable to live in Eastern Washington in August. The dryest and hottest summer on record in Eastern Washington.

Does the DEIS take into consideration climate change that results from fossil fuel transportation? Eastern Washington is only getting dryer and crisper. More trains, just the shear number of them, are going to increase our chances for brush fires, and one likely to start a 100-acre fire is just seven miles to my home.

So the impacts of these facilities must be included in the Environmental Impact Statement.

Response GP3-2

Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively. Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, describes the projected impacts of climate change in the Pacific Northwest.

GP4, **Adams, Bill**

Comment GP4-1

Thank you for giving me the opportunity of testifying tonight. My name is Bill Adams. I'm from the city of Des Moines, Washington, which is also on salt water. Getting right to the point, if the expansion of the two facilities is permitted, additional oil rail car traffic will be required to support their increased capacities.

And more oil car traffic means proportionately higher risk of accidents, derailments, and oil spills. Based on past and recent history, such as the Gulf Oil BP disaster, it's not a question of if these spills will occur, but when they will occur. And when they do occur, jobs will be lost, most likely in excess of the 45 estimated that will be added based on the expansion.

Tourism and recreation income will diminish. Also commercial and recreational fishing, crabbing and shellfish harvesting will suffer. And commercial fishing includes our Native American tribes, such as the Quinault Nation. Their culture and heritage is based on fishing which, by the way, is treaty protected.

So do the right thing and deny this application. And by doing so, it would be benefitting the Grays Harbor community, the state of Washington, and the West Coast.

Thank you.

Response GP4-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP5, Albert, Donna

Comment GP5-1

COMMENT 1 Page S-1, Westway DEIS. There is potential that tar sands crude oil will be shipped overseas from Canada. The DEIS fails to quantify the impacts of this tar sands crude oil. All impacts must be quantified and stated in the DEIS, including greenhouse gas emissions that will be emitted by this tar sands oil when it is used, regardless of where in the world those emissions occur. Emissions that occur anywhere cause ocean acidification and climate change here in the Pacific Northwest. Please also apply this comment to the Imperium DEIS.

Response GP5-1

The Draft EIS considers the crude oils most likely to be handled, stored, and transported under the proposed action: Bakken crude oil and diluted bitumen. Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively. The combustion estimates are based on conservative assumptions, including that total maximum throughput of crude oil is diluted bitumen from Canadian oil sands because it has higher greenhouse gas emissions when combusted. The Final EIS has been updated to include estimated emissions from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion more information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Draft EIS Section 6.5.1.2 describes the projected impacts of climate change in the Pacific Northwest.

GP6, Albert, Donna

Comment GP6-1

COMMENT 2 Westway DEIS. In addition to the tar sands oil that would be shipped through the Port of Grays Harbor, the DEIS must also recognize and quantify the emissions that will be released from tar sands deposits that would not be extracted if the lack of rail shipment options were to shut down extraction due to economic stress. Here is a quote from a Sightline article, and a link to the Oil Change International paper on this topic: "Last week, President Obama rejected the Keystone XL pipeline, a strong stand for climate protection. Yet a new report shows that the oil industry still intends to use massive oil-by-rail terminals proposed in the Pacific Northwest to move their product to market. In fact, in the absence of new pipelines serving the Canadian oil sands fields, the fiercely debated Northwest rail terminals would be the sole driver of new extraction there. That's according to a new Sightline-commissioned analysis by independent research group Oil Change International (OCI)." — from NORTHWEST OIL TRAIN TERMINALS COULD GROW TAR SANDS EVEN WITHOUT KEYSTONE, by Eric de Place, Sightline article online, downloaded Nov 26, 2015, at http://www.sightline.org/research_item/tracking-emissions/ From TRACKING EMISSIONS: THE CLIMATE IMPACT OF THE PROPOSED CRUDE-BY-RAIL TERMINALS IN THE PACIFIC NORTHWEST, report commissioned by Sightline from Oil Change International, which is found at the link above: "In Tracking Emissions: The Climate Impacts of the Proposed Crude-by-Rail Terminals in the Pacific Northwest, OCI deploys the oil industry's own forecasting and modeling tools together with a

detailed examination of the Northwest facilities' configurations. Key findings in the report concern: 1. Propping up Canadian tar sands: In the absence of new pipelines, Northwest rail terminals would be the sole driver of new growth in Canadian tar sands oil. 2. Multiplying oil extraction and climate pollution: Oil train facilities in the Northwest could unlock as much as 382,000 barrels per day of new tar sands production that would otherwise not be extracted. The resulting greenhouse gas pollution from extra tar sands production could be as much as 106 million metric tons per year of carbon dioxide—the equivalent of doubling the total greenhouse gas pollution of Washington state. 3. Feeding the Bakken beast: Northwest oil train terminals could also lead to more oil drilling in the Bakken formation, as much as 114,000 barrels per day beyond what would be produced without the terminals. The resulting greenhouse gas pollution from this extra production could be as much as 30 million tons per year of carbon dioxide—the equivalent of doubling the number of cars on the road in Oregon and Washington." In addition to the tar sands oil that would be shipped through the Port of Grays Harbor, the DEIS must also recognize and quantify the emissions that will be released from tar sands deposits that would not be extracted if the lack of rail shipment options were to shut down extraction. Please also apply this comment to the Imperium DEIS.

Response GP6-1

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

GP7, **Albert, Donna**

Comment GP7-1

COMMENT 3 Westway DEIS. I urge Department of Ecology not to discount studies which do not come from the established oil industry experts or from academia that gets funding from the oil industry. An example is TRACKING EMISSIONS: THE CLIMATE IMPACT OF THE PROPOSED CRUDE-BY-RAIL TERMINALS IN THE PACIFIC NORTHWEST, report commissioned by Sightline from Oil Change International. The claims in this study are not difficult to grasp or evaluate, but no one dependent on the oil industry for funding will recognize them. You must take your role as lead agency seriously. You cannot rely on consultants alone. Note that this DEIS which consultants provided is missing significant and obvious impacts, which unpaid concerned citizens are pointing out to you. You can't rely on the consultants alone. You must take the time to understand all of these issues which are pointed out to you in comments on the DEIS. Find the study at this link: http://www.sightline.org/research_item/tracking-emissions/ Do not discount studies from outside the established oil industry experts or academia. Give every comment serious consideration. Apply this principle to all the comments you receive. Please also apply this comment to the Imperium DEIS.

Response GP7-1

Comment acknowledged.

GP8, Albert, Donna

Comment GP8-1

COMMENT 4 Westway DEIS. You must fully evaluate unmitigatable impacts even if they are difficult to measure or include some uncertainty. The scale of some of the impacts pointed out in the comments you are receiving is so great, that you must find a way to quantify them and fully explain and consider them in the EIS. One example of this is destruction of the ecosystems in Willapa Bay (which contains uncertainty, but would be unthinkable if it happened). Another example is the very large greenhouse gas emissions due to using the transported crude oil, and that the oil terminals enable not only transportation but also future extraction that may find other routes of transport — these greenhouse gas emissions are certain, but you have not quantified them in the DEIS. These are both examples of unmitigatable impacts which the DEIS has not included because they are difficult to measure or include some uncertainty. You must fully evaluate unmitigatable impacts even if they are difficult to measure or include some uncertainty. Apply this principle to all the comments you receive. Please also apply this comment to the Imperium DEIS.

Response GP8-1

As discussed in the Master Response for Oil Spill Modeling Methods, Draft EIS Appendix N, *Oil Spill Modeling*, acknowledges the limitations of the selected modeling tool to depict the movement of oil outside of Grays Harbor. Attachment A of Appendix N discusses two previous large spills, (including the Nestucca off the Washington State coastline) to illustrate the directions that oil can migrate offshore depending on seasonal conditions. Final EIS Chapter 4, Section 4.4, *Environmental Health Risks—Terminal (Onsite)* has been revised to clarify the potential for spilled oil to move outside of Grays Harbor up or down the coast, depending on the specific conditions. Section 4.7, *Impacts on Resources,* discusses impacts on resources, including shellfish, in general terms for the reasons discussed in the Master Response for Environmental Health and Safety Analysis. As such, the impacts can be similarly applied to the extended study area.

Regarding greenhouse gas emissions, Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, have been revised to include emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

GP9, Albert, Donna

Comment GP9-1

COMMENT 5 Page S-3, Westway DEIS. 498 comments were labeled “unique” while 21,755 were labeled as form letters because they contained copied language from talking points or email messages. Please review the 21,755 “form letter” responses. Every single one of those comments represents a person who took the time to send it. Because of the technical nature of oil transport safety and environmental issues, many people did not know what to write. People struggled to express their personal concerns. People without a technical background saw that this project threatened their safety and quality of life. They used the language they found in talking points or mass emails to express their own concerns. You cannot discount or ignore comments that contain

shared phrases, even if only a few words vary. Those unique words come directly from individuals. Look at each of these "form letters" for the unique words and phrases that people took the time to send. Do not ignore or discount comments because they contain shared language. The people most affected by this project have local knowledge of how this project will affect them. You must fully consider each unique word or phrase in comments, even if the comments consist of mostly copied language or phrases. Those unique words represent the concerns and local knowledge of real people. The time or expense required for this review is no excuse to avoid it. You would not need to do this review if few people were negatively affected by this project. The volume of responses itself has meaning. This project negatively affects many people. Each comment submitted deserves full consideration. Apply this principle to all the comments you receive. Please also apply this comment to the Imperium DEIS.

Response GP9-1

The commenter references text from the Draft *Summary* regarding comments received during the scoping period for the EIS. The co-leads reviewed and considered all scoping comments. Final EIS Appendix A, *Scoping Comments*, provides a catalog of all comments received during the formal scoping period.

Every submission received during the comment period for the Draft EIS—whether in writing, oral testimony, or via the web portal—was entered into a comment processing software and reviewed, and each individual comment within each submission was responded to. All comments were considered in updating the Final EIS.

GP10, **Albert, Donna**

Comment GP10-1

COMMENT 6 Westway DEIS. The DEIS fails to quantify the greatest impact of this crude oil, which is the greenhouse gas it will emit when it is used. THIS IMPACT CANNOT BE MITIGATED. The total greenhouse gas emissions of the three proposed oil terminals must be considered together. You cannot separate the impacts of the three projects, in order to make them appear to be less. THE STATE OF WASHINGTON SHOULD BE CONSIDERING THE CUMULATIVE GREENHOUSE GAS EMISSIONS IMPACTS OF ALL PROPOSED NEW FOSSIL FUEL INFRASTRUCTURE PROJECTS TOGETHER (LNG, COAL, OIL) DUE TO VERY LARGE GLOBAL CLIMATE IMPACTS OF CUMULATIVE PROJECT LIFETIME EMISSIONS AND ENABLED EXTRACTION. Assumptions: One barrel of oil produces 317 kg of CO2 when used 64,249,208 barrels of crude/year are shipped through three proposed oil terminals at Port of Grays Harbor Impact: Greenhouse gas emissions due to crude oil shipped through the three proposed oil terminals at Port of Grays Harbor will exceed 20MMTCO2 The size of these emissions compared to annual greenhouse gas emissions due to burning fossil fuels in Washington State will grow rapidly over the proposed life of the storage tanks. 20MMTCO2 represents about 20% of 2011 fossil fuel CO2 emissions in Washington State. This percentage grows to about 60% in 2050, due to greenhouse gas limits in RCW 70.235.020. Ironically, the limits in RCW 70.235.020 have not been updated as Department of Ecology is required to do in RCW 70.235.020, and recently ordered to do by a judge. Experts are now saying industrialized countries must be approaching zero fossil fuel use between 2030 and 2050 (depending on the expert), in order to avoid exceeding 2 degrees of warming. Dept of Ecology was recently sued successfully for failing to update greenhouse gas emissions reduction goals to reflect current science. If Washington State is to

"do its part to reach global climate stabilization levels," our state should be transitioned completely off of fossil fuels before 2050. 2050 is only 35 years from now, well within the lifetime of the proposed oil storage tanks. The percentage of emissions created by oil shipped through Grays Harbor vs. 0 fossil fuels emissions in our State in 2050, is infinity, a number too large to write. This project makes absolutely no logical sense if we are serious about leading the world in reducing greenhouse gas emissions. THIS IMPACT CANNOT BE MITIGATED. Please also apply this comment to the Imperium DEIS.

Response GP10-1

Refer to Response to Comment GP5-1.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP11, Albert, Donna

Comment GP11-1

COMMENT 7 Page S-5, Westway DEIS. Rail impacts are only considered between Centralia and the Port of Grays Harbor. This is a failure to include all the people along the tracks between the oil fields and the Port of Grays Harbor in the EIS process. You must have scoping meetings that include every location affected by this project. There were no scoping hearings for the majority of the towns and cities affected by this project due to proximity to the proposed railway route the crude oil will travel. Please also apply this comment to the Imperium DEIS.

Response GP11-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS.

GP12, Albert, Donna

Comment GP12-1

COMMENT 8 Page S-5, Westway DEIS. This DEIS fails to recognize that rail impacts affect people in other States. How can the Washington State EIS process be adequate for a project that clearly also impacts people in other States? This EIS process is not adequate to address the impacts of rail transport to people in other States. Please also apply this comment to the Imperium DEIS.

Response GP12-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

GP13, Albert, Donna

Comment GP13-1

COMMENT 9 Page S-5, Westway DEIS. The DEIS fails to recognize that significantly large greenhouse gas emissions affect people in other States. How can the State EIS process be adequate when this project impacts other States? This EIS process is not adequate to address the impacts of greenhouse gas emissions to people in other States. This impact to people in other States cannot be mitigated. Please also apply this comment to the Imperium DEIS.

Response GP13-1

Refer to Response to Comment GP5-1.

GP14, Albert, Donna

Comment GP14-1

COMMENT 10 Page S-5, Westway DEIS. Large greenhouse gas impacts affect people outside the United States. What legal environmental evaluation process considers the global impacts of this project? The global impacts of tar sands extraction are measurable, and cannot be mitigated. Please also apply this comment to the Imperium DEIS.

Response GP14-1

Greenhouse gas emissions estimates are presented in the context of state, national, and global emission inventories and reduction goals. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources. Also refer to the Master Response for Purpose and Focus of the EIS.

GP15, Albert, Donna

Comment GP15-1

This project impacts people in other States, both due to rail transport and due to greenhouse gas emissions. The greenhouse gas emissions of the oil transported by this project cannot be mitigated. Please also apply this comment to the Imperium DEIS.

Response GP15-1

Refer to Response to Comment GP5-1.

Comment GP15-2

COMMENT 11 Westway DEIS. Under the Clean Water Act, did this project apply to the Army Corps of Engineers for a 404 permit?

Response GP15-2

As stated in Draft EIS Chapter 3, Section 3.3 *Water*, no dredge or fill material would be placed in any surface water or wetland and no in-water work would be required for the proposed action. Therefore, a U.S. Army Corps of Engineers Section 404 Clean Water Act permit is not required.

Comment GP15-3

Why was no environmental assessment done for NEPA? How was it determined that this project is consistent with the Coastal Zone Management Act? What other federal licenses will be required for this project? Please address the complete federal permitting requirements in the EIS.

Response GP15-3

The proposed action would not require federal permits; therefore, it is not subject to NEPA review.

GP16, **Albert, Donna**

Comment GP16-1

COMMENT 12 On page S-5, Westway DEIS. The actual risks are not clearly stated. Building to code will not prevent rupture in case of a large Cascade subduction zone earthquake. Pilings will not stabilize the storage tank area in case of a large Cascade subduction zone earthquake. Code construction will not withstand a tsunami. Closing valves will make absolutely no difference the case of a large Cascade subduction zone earthquake, because the tanks will rupture. There is no way to mitigate for the largest quakes and tsunamis which are expected at the proposed tank location. This risk cannot be mitigated. Clearly state the actual consequences of a large Cascade subduction zone earthquake, and that this risk and the results of such an event cannot be mitigated. Please also apply this comment to the Imperium DEIS.

Response GP16-1

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events. Final EIS Chapter 3, Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* clarifies the potential for significant and unavoidable impacts.

GP17, **Albert, Donna**

Comment GP17-1

COMMENT 13 On page S-6, Westway DEIS. A tsunami evacuation plan would not reduce the impact of a major tsunami. State that clearly in the EIS. Tsunami-proof construction, or moving the tanks to

a location not subject to a tsunami, must be required mitigation. Please also apply this comment to the Imperium DEIS.

Response GP17-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

GP18, Albert, Donna

Comment GP18-1

COMMENT 14 Page S-19, Westway DEIS. "What are the environmental, health, and safety risks of oil spills, fires and explosions?" — title Please also apply this comment to the Imperium DEIS.

COMMENT 15 Page S-19, Westway DEIS. The document needs another category. What are the environmental impacts of using the oil? Calculate and quantify the greenhouse gas emissions. Include tar sands oil, and enabling future extraction. See my more detailed comment on this topic. Add to this table for clarity in the Executive Summary. Please also apply this comment to the Imperium DEIS.

Response GP18-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively. The estimates are based on conservative assumptions, including that total maximum throughput of crude oil is diluted bitumen from Canadian oil sands, because it has higher greenhouse gas emissions when combusted. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

GP19, Albert, Donna

Comment GP19-1

COMMENT 16 Page S-27, Westway DEIS. Under AIR, the greenhouse gas emissions shown in the DEIS are operational only. Move these quantities to the operational section. Instead, you should show total emissions due to the use of the crude oil. This is a much larger quantity, which is globally significant. See my other comments on this topic: In the total emissions, include emissions from anticipated tar sands oil to be transported through the terminals, and enabled future tar sands extraction. Please also apply this comment to the Imperium DEIS.

Response GP19-1

Refer to Response to Comments GP5-1 and GP18-1.

GP20, Albert, Donna

Comment GP20-1

COMMENT 17 Page S-27, Westway DEIS. Change "climate change would affect" to "climate change will effect" Washington State (it is already affecting us now). Change "climate change could contribute" to "climate change will contribute" to sea level rise. Change "no flooding from sea level rise is predicted at the project site" to "flooding from sea level rise is predicted at the project site" and quantify the range of expected sea level rise in future years. Uplifting delays the effect here for some time, but you have old information if you think there will be no sea level rise at the site within the life of the proposed tanks. Accelerating global sea level rise has been reported in 2015. It takes time for reports to go through the academic publishing process so go directly to experts in this field to apply up to date sea level rise predictions to this site. Apply the principles of this comment throughout the EIS. Climate change is affecting our State now. The emissions from the oil that would go through these proposed terminals causes climate change. This is an impact that cannot be mitigated. Make the direct and certain connection between this fossil fuel use and climate change in Washington State throughout the EIS. Use current climate science. Please also apply this comment to the Imperium DEIS.

Response GP20-1

Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts, Climate Change*, and Final EIS *Summary* clarify predictions of sea level change in the project area, potential for flooding at the project site, and the ongoing nature of climate change. With sea level in the study area predicted to rise 1.57 feet by 2050, the project site would remain approximately 5 feet higher than the projected high tide and would not be subject to flooding even during extreme storm events.

GP21, Albert, Donna

Comment GP21-1

COMMENT 18 On page S-28, Westway DEIS. Under tribal resources no climate change impacts are listed. Events this summer showed that reduced runoff from glaciers at the right time of the year, in combination with drought conditions, increases the water temperature in streams and rivers. The drought and reduced runoff from glaciers are due to the current elevated levels of CO2 in the atmosphere, and will be exacerbated by future fossil fuel emissions. This year, some salmon died in waters that were too warm. Emissions from the crude oil which is proposed to be shipped through these oil terminals will cause additional warming. This is not the only impact of climate change which should be listed here. Other impacts to tribal resources in Washington State include ocean acidification, sea level rise, drought, and fires. Add to this table all known impacts of climate change to tribal resources throughout the State of Washington. Seek information on these impacts from tribes throughout the State of Washington. Scoping hearings should include all tribes affected by climate change in Washington State. Please also apply this comment to the Imperium DEIS.

Response GP21-1

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, describes the projected impacts of climate change in the Pacific Northwest.

GP22, **Albert, Donna**

Comment GP22-1

COMMENT 19 On page S-32, Westway DEIS. The boundaries of the costs and benefit analysis are inconsistent. The line items are not in the same units. Not all the costs are listed. Risks are not quantified in a way that allows comparison. Labor income does not accrue to the city. People living in the city of Hoquiam may benefit from the tax revenue that goes to the city. People outside the city of Hoquiam will not benefit from that tax revenue. Make clear geographical boundaries for the table or tables. You probably need a cost/benefit table for the city of Hoquiam, a cost/benefit table for Grays Harbor County, and a cost/benefit table for the entire geographical area affected by the project in the State of Washington (all towns along the tracks, and people affected nearby). Show all costs and benefits in the same terms. For instance, show per person or per trip costs in the detail, but in the table show the total annual cost/benefit to the community for each item listed, and use the sum of the items listed to compute the cost to benefit ratio. The scope of the contents of the table in the DEIS is incomplete. For instance, property losses are expected along the tracks in towns across the State. This belongs in the "all affected communities in Washington State" cost/benefit table. Calculate the property losses for all the communities on the proposed rail route, and add them up, to create one line item for "property value losses." Other impacts that belong on the communities cost/benefit table include losses due delays in getting crops to market due to the oil monopolizing the tracks, tourism losses due to fumes, aesthetics, traffic gridlock and lost passenger rail, health problems due to chemical exposure along the tracks and fumes from the terminals, risk of losses due to spills (tourism, fishing, quality of life), death or injury due to delays to emergency response (e.g. city of Elma), and risk of death or injury due to accidents and explosions. Include all the costs from all the comments which have been sent to you, in this table, to make the table complete. I don't know how you will quantify items in the table which contain uncertainty such as risk of spills, but every cost or benefit must be shown in the table for it to be a good representation of actual conditions. Include lost job opportunities and risk of lost jobs all along the tracks as a cost. Please also apply this comment to the Imperium DEIS.

Response GP22-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP23, Albert, Donna

Comment GP23-1

COMMENT 20 On page S-34, Westway DEIS. "Unavoidable and significant adverse impacts" — title. Under Tribal Resource, greenhouse gas impacts are not listed.

Response GP23-1

The Draft EIS does not identify greenhouse gas emissions as an unavoidable and significant adverse impact of the proposed action but rather presents estimated emissions from construction and proposed operations.

Refer to Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, greenhouse gas emission estimates from onsite operations, offsite transport from the likely source of crude oil to the furthest likely refinery destination, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively.

Comment GP23-2

Under Environmental Health and Safety, delete "likely" — the large spill or related incident would result in unavoidable and significant adverse environmental impacts. Take out "completely" twice — no mitigation measures would eliminate the possibility of a large spill or related fire or explosion, or the adverse consequences of such incidents. Take out "contribute to" — the impact of the proposed action has significant adverse environmental cumulative impacts on these resources. Please also apply this comment to the Imperium DEIS.

Response GP23-2

The Final EIS reflects clarification of conclusions of significant and unavoidable adverse impacts related to environmental health and safety.

GP24, Albert, Donna

Comment GP24-1

COMMENT 21 A general comment about the ineffectiveness of the SEPA process in implementing the SEPA law: In scoping hearings, I made the comment that greenhouse gas emissions due to the use of the crude oil (NOT just emissions due to transporting it by rail) MUST be quantified in the Environmental Impact Statement. I heard many other people make this comment in the hearings. Either these comments were ignored, or the Department of Ecology staff did not understand what we were saying. The greenhouse emissions due to the use of the crude oil transported over the life of the oil terminals are NOT quantified in this Draft EIS. This is a very, very large impact which CANNOT BE MITIGATED.

Response GP24-1

Refer to Response to Comments GP5-1 and GP18-1.

Comment GP24-2

Another huge omission in this DEIS is the impacts to waterways, towns and people along the tracks between the oil fields and some arbitrary point a short distance from the Port of Grays Harbor. No scoping hearing was held anywhere near these places. Consider that professionals with time and experience are paid to promote this project, while to a large extent unpaid individuals are taking their own time at home to point out the many problems with the DEIS and the project. The Department of Ecology must step up efforts to protect the public from harmful projects like this one. You must ensure that your processes fully implement the SEPA law. Please re-examine a process that relies so much on the efforts of volunteers to stop bad projects. Department of Ecology must fulfill the role of Lead Agency, in the interest of the public. Please review the Department of Ecology processes that implement the SEPA law, and correct it so the law is implemented effectively.

Response GP24-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS.

GP25, **Albert, Donna**

Comment GP25-1

COMMENT 22 The Department of Ecology has failed to update greenhouse gas emissions reduction goals for the State of Washington, and failed to understand that even the existing goals are incompatible with any new fossil fuel infrastructure. These two failures indicate that the Department of Ecology does not understand what we must do to avoid exceeding 2 degrees of warming. Understanding that we cannot stay below 2 degrees of warming and build more fossil fuel infrastructure is essential to evaluating fossil fuel infrastructure projects like this one. Please apply this comment to both the Westway and Imperium DEIS.

Response GP25-1

Refer to the Master Response for Purpose and Focus of the EIS.

GP26, **Albert, Donna**

Comment GP26-1

I'm Donna Albert. I live in Montesano, Washington. I object to this project on moral grounds as a licensed physician, as a Catholic, and as a grandmother. The EIS fails to quantify the greatest impact of this crude oil, which is greenhouse gas. This impact cannot be mitigated.

The DEIS assumes if we don't ship this through Grays Harbor it will be shipped somewhere else. Not so. Port after port is saying no to crude oil. It is morally wrong to enable this oil to be extracted, shipped, and burned.

The oil shipped annually to the three proposed terminals is equivalent to emissions from about 20 percent of all fossil fuels burned in Washington state in 2011.

Washington state statute limits emissions in 2015. This oil will create about 60 percent of emissions of the entire state of Washington that year. Many experts are telling us the world has to stop burning fossil fuels by 2050.

In fact, the Department of Ecology was sued because they had failed to update the greenhouse gas limit. If nobody is burning fossil fuels 35 years from now these tanks will be abandoned.

For these soon to be obsolete tanks project, we are taking too much risks to our community so someone else can make money and this oil can be burned somewhere else.

Our oceans are acidic, our forests are burning, our glaciers are melting, our salmon are dying in streams that are too hot. This project is morally wrong.

Time is running out. We are tearing apart our home. Irreversible harm is done to the ecosystem. And behind all this pain, death, and destruction, there's a stench of an unfettered pursuit of money. The service of the common good is put at risk, our common home, mother earth.

Response GP26-1

Refer to the Master Response for Purpose and Focus of the EIS.

GP27, Alderton, Janet

Comment GP27-1

The findings in the DEISs for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and the environmental damage could be significant.

Response GP27-1

Final EIS Chapter 3, Section 3.2, *Air*, has been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analysis predict lower emissions; the updated level of increased risk is not considered significant. Therefore, the Final EIS concludes no potential unavoidable and significant adverse impacts on air quality.

Comment GP27-2

The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line from Aberdeen to Chehalis and all the way to the source of the oil in North Dakota and beyond.

Response GP27-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action

could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*, which presents a detailed analysis of potential impacts on air quality, water quality, and traffic, in the study area related to routine operation of the proposed action.

Comment GP27-3

The proposed oil shipping terminals and the dirty, dangerous oil trains, storage tanks, tankers and barges that would come with them puts the health and safety of people, the local economy, and our ocean and coastlines at risk. Grays Harbor is the wrong place for oil terminals: The narrow, shallow shipping channel and strong currents put Grays Harbor at high risk of an oil spill. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters. There is no way to mitigate the risks and dangers of these crude oil terminals.

Grays Harbor communities would take on the risk, oil companies would reap the profits, and Grays Harbor would become a throughway for oil going elsewhere to places like California and even overseas should the ban on crude oil export be lifted.

Westway and Imperium, two of three proposed oil terminals for Grays Harbor between Aberdeen and Hoquiam would have the combined capacity to handle nearly 127,000 barrels, or more than 5 million gallons of oil daily (one barrel = 42 gallons). The terminals would be fed by about sixteen loaded oil train deliveries every week (on average more than two per day).

If both terminals are built as many as 319 oil-laden tankers and barges would need to traverse Grays Harbor every year. The twenty-mile long Grays Harbor shipping channel is narrow, shallow, subject to strong currents and has limited staging area for ships and tugs. Up to an additional 319 trips through the Harbor by empty tankers and barges would only add to congestion and collision risk.

The largest Panamax class tankers that would carry oil through Grays Harbor can hold nearly 17 million gallons and are nearly three football fields in length. The Exxon Valdez disaster in Alaska in 1989 spilled about 11 million gallons.

The Washington State Department of Fish and Wildlife stated "Grays Harbor is an area particularly sensitive to the adverse effects of oil spills." A major oil spill could devastate marine resource jobs which support more than 30% of Grays Harbor's workforce according to a 2013 study by the University of Washington. An economic study commissioned by the Quinault Indian Nation found that a major oil spill could put more than 150 tribal commercial fishermen out of a job, resulting in a direct loss of as much as $20 million in wages and up to $70 million in revenue for affected businesses.

In 2014 Washington residents took an estimated 4.1 million trips to the Washington Coast spending $481 million. More than one-third of those visits were to Grays Harbor County to enjoy its spectacular and productive coastal and ocean waters.

Grays Harbor and the region are no strangers to oil spills. The Northwest has experienced two dozen spills and near misses over the last two decades. In 1988, the Nestucca barge holed off Grays Harbor spilling 231,000 gallons of marine bunker oil, killing or injuring an estimated 56,000 seabirds. The oil sheen was seen from Oregon to the Strait of Juan De Fuca.

If built the two terminals together could store 72 million gallons of crude, or the equivalent of 2526 oil tank cars.

Response GP27-3

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for more information.

Comment GP27-4

Grays Harbor sits in a major earthquake and tsunami zone. Geologists say the odds of a “big” Cascadia earthquake happening in the next 50 years are approximately one in three. The odds of the “very big” one are roughly one in 10. According to the U.S. Geological survey the overdue earthquake could produce waves from 20 feet to more than 100 feet high. We can expect that wall of water would topple storage tanks washing away all the oil which could possibly ignite.

Response GP27-4

Refer to Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP27-5

Oil train fires, explosions and derailments

At least 10 crude oil trains have exploded recently in North America, including in July 2013 when an oil train accident in the province of Quebec killed 47 people. Between June 2011 and December

2013 a freight train derailed on average every 3.5 days in the Northwest region. There is no safe way to move oil by train: The tank cars that split open and burst into flames in Illinois in March 2015 were retrofitted to meet a higher safety standard than federal law requires according to railroad officials. The oil cars that derailed in West Virginia in February 2015, leaking oil into the Kanahwa River and burning down a house, were the newer 1232 cars that were supposed to be safer than the older DOT-111 models blamed for previous accidents.

Response GP27-5

Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and the retrofitting of all existing tank cars in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643). However, as noted in Section 4.5.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport*? the risks cannot be completely eliminated.

Comment GP27-6

Air pollution, spills and traffic from oil trains

Oil train spills hit record levels in 2014. In 2013 more oil spilled from trains into rivers, lakes, and marine waters than in the previous forty years combined. Increased rail traffic would almost double the emissions of pollutants from rail transport in the county. Parks and some homes near the project site could be exposed to higher levels of diesel particulate pollution shown to increase the risk of cancer, asthma and other respiratory ailments. Most of that diesel pollution from oil trains would be emitted near homes and businesses on a small section of tracks between Poyner Yard and the Westway and Imperium sites.

Response GP27-6

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of emissions related to onsite operation and rail and vessel transport of the proposed action and cumulative projects, respectively. The Final EIS sections reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions of diesel particulate matter; the level of increased risk is not considered significant.

Comment GP27-7

In the City of Aberdeen, slow moving trains could block many streets at once, eliminating detour routes for first responders. Delays at Olympic Gateway Plaza could increase from between 49 and 70 minutes a day to between 96 to 112 minutes a day for the Westway project, and 108 to 138 minutes a day for the Imperium project.

Sources:

https://washington.surfrider.org/surfrider-releases-recreational-use-study-for-the-washington-coast/

http://daily.sightline.org/2015/02/23/grays-harbor-ship-traffic-the-impact-of-oil-plans/

http://thedailyworld.com/opinion/columnist/crude-oil-and-quakes-what-are-our-elected-officials-thinking

http://www.seattletimes.com/opinion/grays-harbor-oil-terminal-would-threaten-quinault-indian-identity/

http://www.psr.org/chapters/washington/enviro-health/climate-change/position-statement-on-crude-oil-transport.html

http://daily.sightline.org/2015/05/06/oil-train-explosions-a-timeline-in-pictures/

http://www.ecy.wa.gov/geographic/graysharbor/terminals.html

http://www.theolympian.com/opinion/opn-columns-blogs/article31730856.html

http://www.ecy.wa.gov/programs/spills/incidents/Nestucca/NestuccaHistory.pdf

http://www.standuptooil.org/

Response GP27-7

Final EIS Chapter 3, Section 3.16.8, *Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?* clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Comment GP27-8

There are better way to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming. I have invested in four solar photovoltaic systems for my family houses. I recently purchased an electric car. Building more, big infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor.

I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.

Response GP27-8

Comment acknowledged.

GP28, Allee, Pamela

Comment GP28-1

My name is Pamela Allee and I'm from Portland—I live in Portland. I'm also a grandmother and a former maritime engineer, mostly on tankers.

My comment is that no EIS is complete until it extends from source to usage and everything in between, which, of course, would be transportation. The burning flares of the Bakken and the total desolation of the tar sands extraction fields speak to assaults on the planet as incomprehensible as nuclear war, in my opinion, of course.

Those who assist in these hurts are as guilty as the initial perpetrators. No one can claim ignorance or innocence.

These assaults are criminal and the crime is both murder and suicide. Climate changes alone affect water, farming, fishing and disease. Rather than extending our invaluable human resources, we could be using these, our brains, our imagination, to implement creative ways to give good jobs that do not exhibit extreme stupidity and appalling greed.

Listen to the people, not the corporate line.

Thank you.

Response GP28-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

GP29, Alwood, David (H2Oasis, Inc.)

Comment GP29-1

I'm in favor of allowing expansion of facilities to transfer oil products through G.H., given the size of reserves, we as citizens would be remiss if we failed to take advantage of such a financial windfall.

Response GP29-1

Comment acknowledged.

GP30, Ammann, Harriet

Comment GP30-1

Thank you. My name is Harriet Ammann. I'm a toxicologist, and I've been an air pollution scientist since 1984 when I worked at EPA in the office of (inaudible) Health on background to the criteria of pollutants. I have worked for the State Departments of Health, and I work for the Department of Ecology Air Quality Program, and was the primary author of the Diesel Health Document.

So, my concerns is air pollution related to train and vessel traffic. And it is true that Grays Harbor community as a large entity does not violate the standards currently, but I'm talking about the local impact.

So nitrogen oxides are predicted in the EIS to come close to violating the one-hour standard. Where does nitrogen oxide come from? Diesel combustion is a high temperature combustion that combines the nitrogen and oxygen from the air. Nitrogen oxide affects the immune system and it affects the mechanical defense system of the lung. It is an atrament to allergens and increases the risk of asthma. That's just nitrogen oxide.

But nitrogen oxide also combined with particulate matter from diesel exhaust, particulate matter in itself, the Clean Air Act regulates it on the basis of premature mortality. Let's not use the technical term, that's premature death. We allow a certain number of premature deaths. This is not acceptable.

So diesel exhaust also is an atrament to allergens and it increases the risk of asthma. Let me go back for a minute to the people who die prematurely. It is primarily people who have heart problems and respiratory problems. From a public health point of view the heart problem are more important because there are more patients who have heart problems than have respiratory problems.

So I urge you that we have not really seen what is going to happen when the modeling turns out not to be true.

Response GP30-1

Draft EIS Appendix D, *Air Data*, Table 5, reports onsite emissions of criteria and air toxic pollutants, including those from onsite rail operations and vessel hoteling. Table 7 reports emissions of these pollutants from offsite rail and vessel transport in the study area.

As described in Draft EIS Chapter 3, Section 3.2, *Air*, the proposed action is subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and proposed applicant mitigation that would reduce potential impacts on air quality.

GP31, **Anderson, Denise**

Comment GP31-1

My opposition is for the following reasons: 1. The financial impacts to the Cities of Hoq. & Ab as well as Grays Harbor county in lost B&O taxes and revenue to the business' located on the other side of the tracks cannot be mitigated and will negatively impact the quality of services to the residents of GH County. The potential loss of wages and employment to the employees and business' due to the long waits behind the trains also cannot be mitigated and will negatively impact the employment in these cities. The number of vessel calls to the Port will negatively impact the Tribal fisheries as well as the commercial and recreational fishing and crabbing in the Harbor and the Ocean due to the limits of water access during the time it takes these vessels to come and go through the Harbor.

Response GP31-1

Draft EIS Chapter 7, *Economics*, *Social Policy*, *and Cost-Benefit Analysis,* addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7.

Draft EIS Chapter 3, Section 3.10, Recreation, Section 3.12, *Tribal Resources*, and Section 3.17, *Vessel Traffic*, describe potential impacts on recreational, tribal, and commercial fishing from construction and routine operation of the proposed action.

Comment GP31-2

2. The shorelines where the proposed sites will be located are sandy soils and subject to liquefaction.

This also includes the rail lines as well as the 15 plus bridges along the rail routes. I do not believe the shifting soil can be mitigated enough to prevent potential spills and accidents.

3. The proposed sites are located on a fault line with the high risk of an earthquake and potential for a tsunami, neither of which can be mitigated.

Response GP31-2

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP31-3

4. The Treaty rights of the Quinault Nation will be violate with any interruption in fishing or crabbing in the Harbor or on the Ocean. This reason alone should be enough to stop crude oil shipments at the Port of Grays Harbor.

Response GP31-3

Comment acknowledged.

Comment GP31-4

5. The erosion along the banks of the Harbor due to the size of and number of vessel calls to the port cannot be mitigated.

Response GP31-4

As described in Draft EIS Chapter 3, Section 3.1.5.2, *Proposed Action*, proposed action vessel trips would result in a small, incremental increase in the potential for impacts associated with wake compared to the no-action alternative. Final EIS Section 3.1.5.2 explains the basis for this conclusion.

Comment GP31-5

6. With only one day of training for local Emergency responders is not good enough. This simply validates the fact that there is no amount of training that can prepare and protect responders and reidents in case of a spill or explosion.

7. Grays Harbor has to many sensitive wildlife habitat areas to risk losing them to a spill or accident.

8. The lack of maintenance and upkeep on all harbor rail lines and bridges causes extreme risks to waterways and residents along these lines.

9. The potential for a spill and or explosion and fire due to human error cannot be mitigated.

Response GP31-5

Comment acknowledged.

GP32, **Anderson, Gary**

Comment GP32-1

My name is Gary Anderson. I live in Olympia. I spent 12 years trying to clean up the water in the area. Don't waste it. If anybody thinks this is a good idea, well thank God I won't have to work for the next 20 years, because I retired.

But if you think this is a good idea, fly to Beaumont, Texas, drive to the Texas coast where I come from, all the way across the country. And if you get through without puking, this is a good idea.

Response GP32-1

Comment acknowledged.

GP33, Anderson, Glen

Comment GP33-1

Let's get REALISTIC! The "environmental impacts" go FAR BEYOND THE IMMEDIATE SITE. Your EIS ABSOLUTELY MUST include ALL environmental impacts! These include ALL of the MANY DIRECT AND INDIRECT environmental impacts related to EXTRACTING oil, TRANSPORTING it all along the route, TRANSFERRING it into the oil storage facilities in Grays Harbor, LOADING it onto ships, BURNING it in other locations around the world, and POLLUTING THE AIR AND DISRUPTING THE CLIMATE everywhere in the world. Unless your EIS addresses ALL of these, your process is a sham. The public already distrusts the Dept of Ecology, because POWERFUL POLITICAL AND BUSINESS INTERESTS REPEATEDLY OVERPOWER YOUR AGENCY'S HONEST SCIENTISTS and allow our ecology to be abused. In order to restore public trust, the Dept of Ecology ABSOLUTELY MUST do EVERYTHING possible -- and use the BEST AVAILABLE SCIENCE -- to FULLY EXAMINE ALL of the environmental impacts.

Response GP33-1

Comment acknowledged.

GP34, Anderson, Glen

Comment GP34-1

A virtual consensus of climate scientists agrees that THE CLIMATE CRISIS IS AN EXTREMELY SERIOUS -- AND EXTREMELY URGENT -- PROBLEM. Burning fossil fuels (coal, oil, gas) pollutes our atmosphere in ways that caused -- AND CONTINUALLY WORSEN -- the climate crisis. I am ABSOLUTELY APPALLED that you are considering these proposals, because BOTH PROPOSALS WOULD MAKE THE CLIMATE CRISIS MUCH WORSE.

Response GP34-1

Comment acknowledged.

Comment GP34-2

The REAL environmental impacts happen ALL THE WAY ALONG THE ROUTE from where oil is extracted, including the pollution damage and climate damage from those points of origin, and THE RISK OF SPILLS AND OTHER PROBLEMS ALONG THE RAIL LINE ROUTES AND PIPELINE ROUTES, to the proposed Imperium and Westway sites, where SPILLS ARE VERY LIKELY, and all the way across the Pacific Ocean to the FOREIGN NATIONS THAT WILL BURN THE OIL AND POLLUTE THE ATMOSPHERE AND DESTROY OUR CLIMATE. The EIS ABSOLUTELY MUST address ALL of these. Otherwise your process is a lying sham. THE CLIMATE CRISIS IS PART OF THE ENVIRONMENTAL IMPACT!!!!!

Response GP34-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in

the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

GP35, Andrews, Susan

Comment GP35-1

Name: Susan Andrews
City/State/Zip: Hoquiam, WA 98550

I would like to know if the people on the stage live in Aberdeen, Hoquiam area? If not, would they move here knowing what they know? I live in the blast zone, how would they mitigate / recompense all the people who would die? How would they give me back my life? Bottom line, it's about human lives.

Response GP35-1

Comment acknowledged.

GP36, Armley, Jeff

Comment GP36-1

Jeff Armley. I live in King County, Seattle. Where to begin. I mean, it starts with the fracking, oil and shell sounds; then oil by rail; and now refineries. Refineries.

Under current U.S. laws you cannot ship crude oil, but a little light refining, and wha-lah, transportable oil to overseas markets.

I'm not anti-oil. We need oil. But do we need to export it? Where will it be exported to and under? The Pan-Pacific tree, this is going to go, you know, to Asia. And once in Asia where do you think it's going to wind up at? It's going to fuel China's ambitions.

Right now I and many other people have been working with senators, congressmen, and we have new regulations for oil light rail as I think oil people will understand in the pipeline.

It seems to me that these people want to build these facilities as quickly as possible and then grandfather them in before these new regulations get set up. These new regulations are here to protect us against them.

Response GP36-1

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for more information. Refer to the Master Response for Purpose and Focus of the EIS.

Comment GP36-2

Not since the 1900's robber barons has there been more corporate irresponsibility and hostile actions taken towards the populous for no reason other than profiting very, very few people.

The jobs that I hear about for the construction that will not benefit Hoquiam. I'm a union man. Those jobs will be dispatched out of Seattle, Tacoma, and Olympia, and you've got to be union because a guy like me will be on site to make sure.

In the end, basically what we have here are oil companies and railroads acting like a bunch of bullies, cramming this down our throat before our legislative officials can regulate. Like any other bully, they don't want to play fair, and if we force them to play fair they'll take their ball and go home.

Response GP36-2

Comment acknowledged.

GP37, **Armley, Jeffrey**

Comment GP37-1

Once again, Jeffrey Armley, King County, Seattle. Once again I'm not quite sure where to begin. I heard the gentleman that this was a construction complicated matter, that to have two minutes just doesn't seem quite fair enough to address just even a smattering, if you will, of how complex this issue is.

It affects more than just Hoquiam. It affects all the way down that snaking monster. And it starts out in the Bakken oil field in the sand; it starts out in shell pits out in Oklahoma.

The earthquakes, they're polluting the Olalla Aquifer. That's going to poison over five states. This is just—I mean, it's insidious what they're doing.

And your decision doesn't just affect your little square acre, it affects all the way down the line.

We have regulations in the pipeline that are going to be much better than this oil baron mentality that is going on now.

These guys are water barons. This is as it was in the early 19th Century. They need to be regulated. This isn't the Wild West. Empire has been built. They need to be regulated. And the regulation is in order now. If they were to build now, that means we would have an inferior structure that's going to be grandfathered in and they will go on business as usual. If nothing else, wait until the new regulations get put into place. They are in the pipeline. Even the oil man understands that. That's what makes me think they want to get this over with real quick. Don't do it. Thank you.

Response GP37-1

Comment acknowledged.

GP38, Armstrong, Jude

Comment GP38-1

My name is Jude Armstrong. I live in Hoquiam, Grays Harbor County. I've been looking forward to this day for a long time, but I've got to tell you, I haven't been able to get my homework done. The study is so long, I don't know how anybody is going to plow through those thousands of pages and get you really good written comments. But I'm going to try, as are most are of my friends. So we will be submitting written testimony. Just give us another couple weeks.

I looked around to see if there's anybody here from Westway or from Imperium, and I think that we do have one from Imperium. I just want to say that when Imperium came to Hoquiam, we were so happy they were going to come and produce clean energy. And Brian you're partly responsible for that. So I appreciate it. And now with REG coming we hope you will be able to continue in that clean energy tradition.

Westway was great, too. It's good that we're trying to feed the world. But I -- I'm feeling like that I'm really on a battle line against crude oil, and I'm really sorry that Westway and Imperium and REG are involved with it, because they were really good for us.

There's so many reasons that have been given to you today that I could give more of them, but two minutes is too short. I just want you to know what my intent is and what I beg you to do.

Please, don't destroy our way of life. Don't destroy my ability to bring my grandchildren here to enjoy a summer vacation.

Please don't destroy our health. I have problems with COPD. It's going to be a real challenge for me if they come. Don't destroy the safety we want for all of our children.

Response GP38-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP39, Ashby, Crandall

Comment GP39-1

Westway and Imperium Draft EIS (DEIS) comments.

"The DEISs for Westway and Imperium show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and could cause significant environmental damage.

These proposals simply offer too much risk and too little reward. Grays Harbor communities would take on the risk and oil companies would reap the profits, while Grays Harbor would become a through way for oil headed elsewhere.

Much of what makes Grays Harbor special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters.

Response GP39-1

Final EIS Chapter 3, Section 3.2, *Air*, has been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analysis predicts lower emissions; the updated level of increased risk is not considered significant. Therefore, the Final EIS concludes no potential unavoidable and significant adverse impacts on air quality.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP39-2

The alarming safety record of oil trains means an explosive oil train derailment is not a question of if, but when. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line, from Aberdeen to Chehalis and all the way to the source of the oil in North Dakota and Canada".

Response GP39-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*, which presents the analysis of potential impacts on air quality, water quality, and traffic in the study area related to routine operation of the proposed action.

Comment GP39-3

The above statement expresses my concerns. I commercial fish for a living as does my extended family. Crude oil shipments and storage on the banks of the Grays Harbor (GH) estuary is threatening to our fisheries and local economy. There is one type of crude oil that is especially threatening and that one is dilute bitumen (dilbit) from Canada. This type of crude is not covered under the GH Geographic Response Plan. It sinks in water when spilled and would not be retrievable if a spill happened. The mitigation for a spill in GH is the Geographic Response Plan which would not work for dilbit. This puts our family and all other fishermen at a high level of risk that would destroy

our local fisheries up and down the coast of Washington. Please put a section in the DEIS covering dilbit and how it would be recovered if a spill happened. If an oil spill can't be contained and mitigated then the projects should not be allowed.

Response GP39-3

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

GP40, **Ashby, Dan**

Comment GP40-1

RE: Comments to Draft EIS for lmperium and Westway

10/09/15

Dear Hoquiam and DOE,

Last evening there was a public hearing concerning oil terminals held in Aberdeen. People talked about bomb trains in recognition of how train wrecks carrying North Dakota crude often explode into fire balls. Much of the 2 minute testimony per person centered on the scope of the projects DEISs. Discussion centered on how there are many communities that these oil trains, headed to Hoquiam, will pass through. In fact many of the commenter's were from distant communities with real concerns about mile long oil trains and the dangers they pose for their citizens. As an example: The commenter from Hood River was worried about how an oil spill into the Columbia would endanger salmon migrations at the dam's fish passage ways and cited scientific data as proof. Another east of Vancouver commenter was worried about the train tracks close to schools all along the way from North Dakota to Hoquiam. Even another, who couldn't attend from Spokane, had a person read their concern about elevated train tracks, river crossing over drinking water sources and proximity to large population centers. There were many like commenter's with distant local concerns.

he DEIS only covers from Centralia to Hoquiam now. Because of the huge amount of oil train traffic now being anticipated for the North West it is only prudent that these remote concerns are addressed as it is not fair for local projects with a proposed local benefit to shift costs and impacts to other communities without resources to pay for them. The DEIS should be opened up to include all the impacts from North Dakota and Canada to Hoquiam.

Another point in the DEIS that needs to be addressed.

Response GP40-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP40-2

I'm a commercial crab fisherman. Our whole extended family fish for a living or work in the bay as oystermen. The DEIS does not address crude oil from Canada that does not float but sinks to the bottom when spilled into water. The DEIS needs to address this and add a section to explain how this tar sands oil will be mitigated for and cleaned up in case of a spill. Another point to be acknowledged is rail cars that leak crude while in transit. This has been an ongoing problem for crude oil trains in the state and would create serious long term problems for fisheries in GH and the ocean. If these issues can't be mitigated then these projects should not go forward as the risks far exceed any employment benefits.

Dan Ashby
78 Groveland Ave.
Aberdeen, WA 98520

Response GP40-2

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities. For more information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework.

GP41, **Ashby, Dave**

Comment GP41-1

Comments to draft EIS Westway-lmperium.

Dear Sirs,

Our family has commercial fished, sport fished and hunted in Grays Harbor county for over a century. Oil terminals on the GH estuary are the biggest threat that has ever been proposed. Our

family has over 14 members making a living off the ocean and bay and the draft EIS does not disclose what a spill would mean to our family members.

A more through EIS would study the impacts of an oil spill in the estuary and give citizens a review of what real impacts would mean to their livelihoods and to their families. There has been economic studies prepared by the Quinault Indian Nation and Friends of Grays Harbor that shows how much fishing and hunting add to the economic well being of the county. Please add these to the draft and put them in a location that is easy to find. Doing this would add real meaning to the draft EIS. Someone said this below quote and it makes perfect good sense to our family.

"Although the likelihood of a large spill, fire, or explosion is low, the potential for significant adverse impacts on the environment and human health in the case of such an incident is high"

Dave Ashby

Response GP41-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP42, **Ashby, Ken**

Comment GP42-1

Westway and Imperium crude oil-by-rail terminal EISs.

A quick read of the DEIS reveals that there is missing information and a thorough understanding of the natural environment where these projects are being located. The projects are to be serviced by a railroad (RR) that was built to haul logs and lumber to distant markets. The RR's were built to standards of their time, in the latter 1800s, with less than modern engineering techniques. They cross or are adjacent to as many as a 100 streams and rivers. This is just on the line from Centralia to Hoquiam. These waterways feed into the Grays Harbor estuary that serves as a nursery for many species that support the economic base of GH county. Any spill will ultimately end up in the estuary. Fully 30% of GH's economy is marine related.

Response GP42-1

The commenter does not provide sufficient detail on missing information to allow for a response.

Comment GP42-2

A simple reading of daily newspapers and we learn that these trains hauling crude oil crash, spill, and burn on a regular basis. We also learn there is great difficulty in cleaning up the mess from a spill with associated high costs with some as much as a billion dollars. Even though cleanup is accomplished to some degree, on average only 14% is ever retrieved. Add in the reality of remoteness of the crossings, the nature of the product being hauled and the new analysis by safety experts about the why crude oil trains crash and you have real concern about these projects.

Response GP42-2

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities.

Comment GP42-3

Remoteness of crossings- There is no simple way to get to many of these possible spill locations. At best it would take days to marshal any type of true cleanup operation. As an example- the Chehalis River Surge Plane cleanup must contemplate tides, high river flows and dense vegetation. The bridges are antiquated and feeble at best. The RR road beds are spongy and soft in a climate that has over 80 inches of rain most years. In recent years the local RR has experienced three derailments with one derailment just toppling over and while not even moving and also adjacent to the Chehalis river.

Response GP42-3

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. The geographic response plans referenced in Final EIS Chapter 4, Section 4.2, *Applicable Regulations*, provide additional information on sensitive resources that could be affected by a spill at specific locations in the study area. The plans also identify appropriate response strategies. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on the Chehalis River.

Comment GP42-4

The product- the RR has said it must haul legal products in North America. One product that they have to haul is dilute bitumen (dilbit) out of Canada's tar sands in Alberta. Canada is looking for markets for this product and the Canadian government has not been able to get sufficient pipelines from Alberta to BC to ship from Canadian ports. It is assured that if GH is an oil port dilbit will be shipped here. The problem with dilbit is that when spilled it sinks in water. There is no known approved technology to clean up dilbit in water. Even DOE is struggling to develop a technology and the best minds have not resolved this problem. These oil shipping projects in GH rely on current

technology to cleanup a spill as stated in the DEIS but the technology does not exist for the dilbit they propose to cleanup.

Response GP42-4

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Comment GP42-5

New analysis- currently new information reveals that because of the nature of long crude oil trains (over 100 tank cars long), track harmonics, sheer combined weight, and rail deficiencies oil trains are crashing often in America. A casual review of the railroad conditions in GH, Thurston and Lewis counties and a conclusion would be that these local rail facilities are below standards of Class One mainlines that are experiencing recent crashes.

Response GP42-5

As stated in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, the PS&P rail line is considered a Class 3 short-line railroad by the Surface Transportation Board based on its annual revenue. The Federal Railroad Administration (FRA) classification of railroads is based on the number of mainline tracks and operating speed. PS&P tracks are registered with FRA as Class 2 tracks with an overall maximum speed of 25 miles per hour for freight trains, although there are exceptions to the maximum speed in certain areas as noted in Section 3.15.4.2, *PS&P Rail Line Track Conditions and Physical Characteristics*.

Comment GP42-6

I'm a crab fisherman and my extended family all fish commercially and recreate in the GH area as our ancestors have. Bringing crude oil facilities to GH is a high risk endeavor with low benefits to local citizens. DOE and the city of Hoquiam must factor in my concerns and the DEIS must reflect in real terms just how my concerns are going to be mitigated. If these concerns can't be remedied then Westway and lmperium projects should not go forward.

Kenny Ashby
PO Box 2165
Westport, WA. 98595

Response GP42-6

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP43, Ashby, Nicholas

Comment GP43-1

Comments to: lmperium and Westway Expansion Projects DEIS.

Dear Sirs,

I come from a large fishing and hunting family. Fishing and oystering is what we do to make a living. All of our extended family is commenting on these projects because of the seriousness of the issue. Many folks at hearings have stated that in Grays Harbor (GH) county 30% of the economy is marine related. This is a true statement and proven by recent studies contracted by Surf Rider Foundation. If there was ever a crude oil spill all these jobs would be lost as well as the economic activity provided by the natural environment. The DEIS does not develop a vision of how a spill would impact this economic activity and develop a strategy for mitigation. The DEIS recognizes over time a spill will happen but does not go that next step of study and mitigate the total impacts.

Response GP43-1

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP43-2

In recent years a Geographic Response Plan (GRP) has been updated to cover the estuary and ocean in case of an oil spill. The updated plan does not address how oil that sinks (Canadian Tar Sands crude or dilbit) would be cleaned up and the fact that a Government Transportation Study relates that only 14% of spilled oil is even recaptured. This is of great concern for fishers as all the natural animals living in the ocean and estuary frequent this environment. One can only imagine how thousands of gallons of oil that sinks will affect these animals and juvenile forms. As an example: GH has been fortunate to not have endangered species designations in their salmon stocks. How would two years of oil spill contamination affect smolts and fry returning to the estuary and ocean on out migration. Studies in the Alaska Valdez spill salmon are still being impacted by that spill. Would this happen in GH? Also- these two developments could be shipping all dilbit (millions of gallons a day) in the future as all the associated transfer and storage facilities are profit driven.

Response GP43-2

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4,

Environmental Health and Safety, and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Comment GP43-3

Then there is this issue with the local rail road: The EIS implies that the local railroad creates little additional danger to the present traffic and compares our local line to the main lines of BNSF. Truth is there Is a huge difference In as BNSF Is a class one line hauling vast amounts of goods and relatively well maintained. While the local PS&P is ill maintained and has had three derailments in the last two years. Add in that the local RR skirts or crosses over 100 streams and rivers between Centralia and Hoquiam. One derailment would devastate valuable fisheries and clamming in the GH area. A full review of the PS&P railroad and its ability to haul crude oil to Hoquiam and an engineering study to recommend full replacement of the line before it is used to haul oil should be part of the DEIS.

Response GP43-3

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Section 4.5, *Environmental Health Risks—Rail Transport*, addresses potential rail accidents and derailments.

Comment GP43-4

It is interesting, to my knowledge, there has never been a shakeout or performance drill for the GH GRP. Without a test drive this plan is just hope and hope is not a responsible plan to deal with an oil spill. Especially in light of a spills potential devastation of the local environment and economy. A full review and test drive of the GH GRP should be initated. The test drive should be under varied conditions and not the perfect conditions the GRP is develop upon. The GRP also requests that local fishermen help with oil recovery. This should be part of the test as all parts need to be tested for GRP completeness.

Response GP43-4

Comment acknowledged.

GP44, **Ashby, Steve**

Comment GP44-1

Westway and lmperium crude oil by rail terminal EIS-draft comments.

Sirs,

These are my comments to the draft EIS. Our family have clammed, fished, commercial fished and hunted many years around Grays Harbor and the Pacific ocean. GH has provided for our family and brother's families far back in history as well as today. During the Great Depression my uncles, aunts, parents and grandparents survived because of what was offered in the marine environment and the woods. Even up until today the ocean and bay keep giving.

Marine oil terminals are not the answer to unemployment for the "Harbor". Though they create some jobs they threaten our way of life as crude oil spills and the always drip, drip, drip of this product into the environment never stops. While fishing years ago the crab fishermen experienced this:

1998 Dec. 23: Barge Nestucca broke loose from tug, sustained a six-foot gash in its side when it collided with the tug, spilling 231,000 gallons of bunker oil off Grays Harbor. More than 3,500 seabirds were killed, mostly encapsulated in a thick oily mousse as they washed up on Vancouver Island.

From this spill the Dungeness crab fleet was put at risk of lost fishing time and damage to their fishing gear. Many birds along the coast were lost and clamming was impacted. The one thing not known was what long term damage was done to the crab and clam resource. Studies were not required.

Response GP44-1

Comment acknowledged.

Comment GP44-2

The DEIS glosses over potential oil spill impacts to fisheries. The DEIS should at the very minimum outline losses to fisheries over time in case of drip, drip, drip or a major spill.

Response GP44-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including on fish and other aquatic species. The Final EIS section acknowledges that these potential impacts would affect commercial and recreational fisheries.

Comment GP44-3

The DEIS should do more in the way of studying how dilapidated the rail line into Hoquiam is and require a full blown upgrade before any crude comes to GH. There have been three derailments in

the last couple of years and pictures showing the poor quality of the RR Bridge at Wynoochee brings pause to these projects.

Response GP44-3

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For more information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework.

Comment GP44-4

Another requirement is the DEIS should show how barge and ship traffic is managed in an estuary currently with all the marine traffic there already. At best only 14% of spilled oil is picked up. A study needs to examine just how the remaining unrecovered oil will hurt marine resources. These are all potential costs and need to be identified and mitigated not glossed over.
In closing- if all the potential impacts can't be mitigated then these projects should not be developed as the potential impacts far outweigh the benefits to the community.
Steve Ashby (Commercial Fisherman) Amy [?] A. Ashby (spouse 92 Groveland Ave Aberdeen, WA. 98520
F.U. [indecipherable]

Response GP44-4

Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*, discusses the systems that are in place to manage vessel traffic in Grays Harbor safely. The Final EIS section provides additional information. Chapter 4, Section 4.6, *Environmental Health Risks—Vessel Transport*, presents an analysis of potential impacts from increased risk of vessel collisions, groundings, and allisions and related consequences (e.g., release of crude oil) under the proposed action, and proposes mitigation measures to reduce the likelihood of a vessel incident. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP45, **Atkinson, Kim**

Comment GP45-1

The DEIS failed to substantively address the concerns raised by many. The specific concerns are related to the Columbia River Gorge National Scenic Area. This is inconsistent with the scenic area act, and it is illegal under the State Environmental Policy Act to ignore these impacts. The DEIS fails to disclose the actual risk of an oil spill or explosive accident in the Gorge.

The DEIS provided analysis of the risk of a spill or explosion near the facility where maximum speeds are limited to 25 mph. The DEIS completely fails to disclose the risk of spills and explosions in the Gorge, where the maximum speed is 50 mph for unit trains of oil and 60 mph for mixed-commodity trains with up to 34 oil tank cars dispersed throughout the entire trainThe DEIS fails to analyze the likelihood of a spill in the Columbia River along hundreds of miles of the BNSF rail line. Along with failing to analyze the likelihood of a spill, the DEIS fails to analyze safety impacts to local communities, environmental impacts to threatened and endangered salmon species in the Columbia River, and operational impacts on Columbia River Dams. There are better way to meet our energy demands.

Response GP45-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Comment GP45-2

Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our electricity needs and respond to global warming. Building more, large infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor. Washington state should continue to lead on safe, renewable, clean energy solutions and say no to more oil and coal. I urge you to do everything in your power to stop these dirty and dangerous projects. I urge you to protect Grays Harbor, the Columbia River Gorge, and our communities by rejecting the proposed Westway and Imperium oil terminals.

Response GP45-2

Comment acknowledged.

GP46, Attermann, Rein

Comment GP46-1

Good afternoon. My name is Rein Attemann. I'm here on behalf of Ben Stuckert who is president of Spokane City Council who cannot be here today. Our city serves a major rail hub in the Northwest. We used to like that designation. It used to mean that local exports could get their products fast.

Being a rail hub used to mean you had economic advantage. Unfortunately, for us it means we could be the location of the next environmental catastrophe. The rail hub is losing its value. Miles and miles of fossil fuel trains are creating a significant public safety risk. The alarming increase of mile-long explosive oil trains coming through downtown Spokane puts the members of our community at incredible risk.

We see the terrifying video explosions and derailments in North Dakota, West Virginia and Alabama. I can say I am not confident in our public safety teams and these railroad companies are logistically coordinated enough to handle the devastation as what has happened in these areas of these states.

The bottom line is that we cannot sit idly by until we're the next Quebec, Alabama, North Dakota, Spokane, King County, Grays Harbor, Vancouver, or any other community across the state. I ask that you thoroughly consider any and all impacts that this project will have to the safety, and health, and security of the residents of Spokane and extend that cumulative impact analysis.

Thank you.

Response GP46-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP47, Autrey-Schell, Yovonne

Comment GP47-1

Neither Westway nor Imperium are willing to put up a bond to fund cleanup of the inevitable oil spills that will occur. When they do occur, our shellfish beds will suffer, as will the fisheries of Grays Harbor and surrounding areas. Our local economy consists largely of aquaculture/fishery operations and tourism, which will be devastated when a spill occurs. This is not even taking into account the damage that will be done to local streams and rivers, as well as Grays Harbor itself and the waters of the Pacific ocean outside the harbor. Please do not allow these oil terminals and rail transport into Grays Harbor! The risks and inevitable harm, to both the environment and our local economy, do not outweigh the few jobs that will be opened because of the operation.

Response GP47-1

Draft EIS Chapter 4, *Environmental Health and Safety*, Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP48, **Avery, Jean**

Comment GP48-1

Environmental Health Risks—Rail

Comments on Grays Harbor Draft DEIS by Jean M. Avery

Text is taken directly from the DEIS [**boldface added**]. *My concerns are in italics.*

Based on this DEIS, pursuing the proposed action in Grays Harbor would be reckless and dangerously irresponsible. It seems that Westway is not prepared for the realities of the high-risk transport of volatile oil.

The DEIS admits that "a large spill or explosion would have unavoidable and significant adverse impacts," and that "no mitigation measures would completely eliminate the adverse consequences of a large spill or explosion."

More specifically, the DEIS states that "most emergency response organizations will not have the available resources, capabilities, or trained personnel to safely and effectively extinguish a fire or contain a spill of this magnitude…. Response to unit train derailments of crude oil will require specialized outside resources that may not arrive at the scene for hours."

Also note: THE LOCAL FIRE DEPARTMENTS ALONG THE PS&P RAIL LINE DO NOT HAVE TECHNICAL HAZARDOUS MATERIAL TEAMS.

The comments below are further evidence for lack of preparedness by Westway for a major disaster.

Page	Risk?	Comment / Concern

4.5-4 4.5-3 4.5-5 4.5-6	High	Under the proposed action plan, potential risks related to oil spills, fires, or explosions associated with rail transport include: • potential for more frequent spills of bulk liquids relative to the no-action alternative • potential derailment resulting in a spill of up 900,000 gallons, or 21,400 barrels or 30 full tank cars. The DEIS tries to estimate that such spills will not happen except in 11,000 years. However, previous incidents in Lac-Mégantic, Québec; Casselton, North Dakota; Aliceville, Alabama; and Lynchburg, Virginia have been more significant than estimated risks. The DEIS also states that **"it is not possible to predict the timing or magnitude of an incident.** " Also, **"the movement of spilled oil in the Chehalis River can vary dramatically, depending on weather conditions and hydrologic flow conditions." "Oil could move into the estuary in as few as 7.6 hours."**
4.5-2 4.5-3 4.5-7 4.5-12	High	Speed and length of trains are critical factors in predicting severity of a derailment: • **Previous derailments occurred at 5, 6, 10, and 5 mph.** • The PS&P rail line maximum speed is 25 mph. • The prevention plan includes reducing speeds to **no more than 40 mph.** • Trains traveling to the project site would consist of unit trains (longer trains carrying a single commodity) of oil. Increasing the number of cars carrying high-hazard commodities increases the chance of environmental harm in the event of rail incident. • An oil leak could occur over several miles of track. *Who will enforce standards for speed and length? Even at low speeds, there can be derailments.* *"Voluntary Measures" and "an emergency preparedness workshop…not more than one day in length…and at least once annually" are not sufficient preparation for such high-risk situations.* The DEIS even suggests that "Ecology should urge the legislature to amend current laws…and seek funding for a grant program to supply firefighting equipment and oil spill response equipment to local responders along the rail line. *This sounds like a clear admission that the resources are not sufficient to deal with high-risk situations.*

4.5-3 4.5-4 4.5-7 4.5-10	High	The new oil types include heavy crude oils such as bitumen from Canada and Bakken crude from North Dakota. Bakken crude oil is more flammable than other heavier crude oils. Trains carrying such oil are **"high-hazard flammable trains."** ***The DEIS seems dismissive of dangers of explosions, saying that long-term historical data show that most spills do not result in fires or explosions.***

Response GP48-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations, including updated requirements as described in Section 4.2, *Applicable Regulations*. Chapter 4 also identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. The geographic response plans referenced in Section 4.2 provide additional information on sensitive resources that could be affected by a spill at specific locations in the study area. The plans also identify appropriate response strategies. However, as noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

The results presented in Draft EIS Chapter 4 are not directly comparable with studies that evaluate risks outside this area (e.g., the BNSF main line). This is mainly because the risk analysis presented in the Draft EIS is specific to the PS&P rail line. There are substantial differences between the study area (PS&P rail line) and the extended study area (e.g., BNSF main line) with respect to rail transport conditions. The scale of the nationwide rail system is more than a 1,000 times the length of the 59-mile-long segment of the PS&P rail line in the study area and different classes of rail travel at different speeds and under different regulatory requirements. Many more trains travel each day on the main lines. For these reasons, the likelihood of an incident occurring in the study area is lower than the likelihood of an incident occurring on the entire mainline rail system.

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment GP48-2

4.5-11 4.5-12	High!!!	The DEIS quotes the Pipeline and Hazardous Materials Safety Administration (2014): "In the event of an incident that may involve the release of thousands of gallons of product and ignition of tank cars of crude oil in a unit train, **most emergency response organizations will not have the available resources, capabilities, or trained personnel to safely and effectively extinguish a fire or contain a spill of this magnitude** (e.g., sufficient firefighting foam concentrate, appliances, equipment, water supplies). **Response to unit train derailments of crude oil will require specialized outside resources that may not arrive at the scene for hours."** **THE LOCAL FIRE DEPARTMENTS ALONG THE PS&P RAIL LINE DO NOT HAVE TECHNICAL HAZARDOUS MATERIAL TEAMS.**

Response GP48-2

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP48-3

4.5-6 See also 4.7	High	Per Table 4.5-1, there are sensitive habitats along the PS&P Rail Line: • Three marbled murrelet critical habitat areas - 3 miles • Three crossings of bull trout streams designated as critical habitat areas - 2 miles • Chehalis River Surge Plain Natural Area - 6 miles • Stretch of Chehalis River close to the rail line, designated as critical habitat for bull trout – 10 miles • Critical habitat for the Oregon spotted frog along Black River - 10 miles • Locations of two sensitive plant species (multiple location between US Route 12 and the Black River crossing – 10 miles

Response GP48-3

Comment acknowledged.

Comment GP48-4

4.5-8		The local responders will do what is necessary to evaluate and report on the situation, keep themselves and the public safe, and monitor response and cleanup operations for compliance with local ordinances and permits. Steps to isolate or evacuate may be required. *Who are the local responders, how many are there, and are they capable of timely and effective response.* Per the DEIS, the U.S. Environmental Protection Agency, U.S. Coast Guard, and Ecology may take a more aggressive role in the initial response operations to ensure that the responsible party is taking appropriate and timely action to mitigate damages to the environment. ***But hours matter!***

Response GP48-4

Refer to Response to Comment GP48-2.

Comment GP48-5

4.5-8	High!	*Loop-holes in "emergency preparedness":* The federal basic oil spill response plan (49 CFR 130) currently applicable to rail operators with oil shipments of a capacity of 3,500 to 42,000 gallons per car **does not require** equipment to be contracted and available for an immediate response to an oil spill….Prior to adoption of [additional] rules, the federal oil spill response plans will be used to meet the state requirement. ***Then who will respond, contain the spill, and ensure safety of persons, wildlife, and environment?*** Placement of booms is part of the response plan. ***But booms won't help if there's an explosion.***
4.5-9	High!	In some cases, economic considerations may dictate response priorities (for example preventing oil from affecting a dock area near a waterside restaurant or a marina). These priorities are discussed prior to a spill and reflected accordingly in the GRPs to prevent a delay in the allocation of **potentially scarce response assets** during an active spill response. ***The DEIS admits that response assets are scarce.***

Response GP48-5

Final EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*, has been revised to reflect updates to state regulations requiring rail operators, such as the PS&P, to develop oil spill contingency plans consistent with WAC 173-186. Oil spill contingency planning will require identification of appropriate response strategies and response assets. Refer to the Master Response

for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Comment GP48-6

4.5-16	High	*The DEIS seems to be avoiding responsibility – passing the buck? – by boldly suggesting :* To improve response capability on the Chehalis Tribe Reservation in the case of an oil spill, the Chehalis Tribe should identify members who could respond to oil spills and provide this information to PS&P and the Grays Harbor Local Emergency Planning Committee. To improve response capability in Grays Harbor in the case of an oil spill, the Quinault Indian Nation should identify members who could respond to oil spills and provide this information to PS&P and the Grays Harbor Local Emergency Planning Committee. *In other words, the tribes will have to manage on their own?*

Response GP48-6

The mitigation measure the commenter is referencing recognizes that Quinault Indian Nation and Confederated Tribes of the Chehalis Reservation members may be the first on the scene of an accident. Early notifications and initial responses can reduce the impacts of spills. A separate mitigation measure proposes annual training for hazard awareness oil spill training for the tribes to provide information on danger and improve safety. As stated in the Draft EIS, the local fire and police departments are the most likely first responders. The state and federal response system would be used to determine the appropriate level of response for a spill or incident.

Comment GP48-7

4.5-16		*The DEIS naively suggests that a public awareness campaign will be adequate:* To reduce the risk of an incident on the PS&P rail line, PS&P should work with local officials to collaborate and initiate a comprehensive community awareness campaign to educate and inform the public of the dangers of trespassing into the railway and trying to beat a train.
4.5-16 4.5-17	High	**A large oil spill or explosion would likely cause unavoidable and significant adverse environmental impacts.** ***Hoping that* "the likelihood of a large spill or related explosion is low, ...the potential for significant consequences to the environment and human health in the case of a large spill or explosion is high.** **No mitigation measures would completely eliminate the possibility of alarge spill or explosion, nor would they completely eliminate the adverse consequences of a large spill or explosion.**

Response GP48-7

Comment acknowledged.

GP49, Avery, Jean

Comment GP49-1

Environmental Health Risks—Vessel Transport
Comments on Westway/Imperium Expansion Project at Grays Harbor Draft EIS
by Jean M. Avery
Text is from DEIS (**boldface added**). *My comments are in italics.*

It seems that the DEIS states the risks many times, and then minimizes those risks as unlikely. But, if incidents cannot be predicted, they cannot be discounted.

The DEIS clearly states: A large oil spill or explosion would likely cause unavoidable and significant adverse environmental impacts…[and] the potential for significant consequences to the environment and human health in the case of a large spill or explosion is high.

Page	Risk?	Comment/Concern
4.6-1 4.6-3 4.6-5 4.6-13	Too high to be ignored	Per the DEIS: • **It is not possible to predict the timing or magnitude of an incident.** • Spill scenarios describe possible spills of 105,000 gallons to 15.1 million gallons. *If incidents cannot be predicted, then they cannot be discounted. Yet, the DEIS estimates no occurrences for 120 years or more! The DEIS also seems to minimize the spills, because they were "less than a full discharge of contents."* Historically, there have been several vessel incidents in Grays Harbor: 28 from tankers and tank barges in 13 years. One spill affected beaches as far south as Oregon and north to Vancouver, British Columbia. The DEIS clearly states: **A large oil spill or explosion would likely cause unavoidable and significant adverse environmental impacts…[and] the potential for significant consequences to the environment and human health in the case of a large spill or explosion is high.**

Response GP49-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Section 4.6.3, *What mitigation measures would reduce impacts related to vessel transport?* to reduce the likelihood of a spill reaching the environment and the potential impacts if an incident were to occur in Grays Harbor. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. For more information about the data, assumptions and methods used in the risk

analysis, refer to the Master Response for Risk Assessment Methods and the Master Response for Environmental Health and Safety Analysis.

Comment GP49-2

4.6-3	High	Grays Harbor has navigational challenges, including a bar at the entrance to the harbor, a constrained navigation channel for deep-draft vessels, and sharp turns in the channel.

Response GP49-2

The comment repeats text from the Draft EIS.

Comment GP49-3

4.6-6 See also 4.5	High	*How can a spill be contained? And whose responsibility is it?* Per the DEIS, the owner or operator activates the vessel contingency plan by making notifications and coordinates with Ecology and the U.S. Coast Guard to take any necessary actions to protect the public health, welfare, and natural resources of the state. • The GRPs describe response strategies such as placing booms to close off access of spilled oil into environmentally sensitive sites. ***If there is an explosion, booms won't help.*** ***Are there sufficient resources?*** **According to Section 4.5, resources are limited.**

Response GP49-3

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities. For more information about the development and implementation of mitigation measures, refer to the Master Response for Mitigation Framework.

Comment GP49-4

4.6-11 4.6-13		To reduce the risk, the DEIS indicates that Westway will ensure that vessel traffic is limited while a laden tank vessel is in the navigation channel. Also, the DEIS suggests that the USCG should research the need for a one-way channel transit along the inner harbor for laden tank vessels and, if needed, revise regulations. *What about other boats in the harbor? What about tribal fishing boats? What about recreational boat?*

Response GP49-4

Traffic-related impacts specific to recreational and commercial fishing boats are addressed in Chapter 3, Section 3.10, *Recreation,* and Section 3.17, *Vessel Traffic*, respectively. As noted, potential conflicts within the navigational channel are not anticipated to be frequent. Further, recreational

boats and commercial fishing boats can navigate around larger vessels limited to the navigation channel to avoid potential impacts. Implementation of mitigation measures described in Section 3.17.7.1, *Applicant Mitigation*, to provide advance notice of arrivals and departures would reduce impacts on these types of boats.

Comment GP49-5

4.5-14		*Who will pay? Will the vessel operators cover all costs, or will taxpayers have to pay the remaining amount?* Washington State law requires tank vessels to pay at least 1 billion dollars. **Washington State places no limits on liability of third parties, allowing the state to recover cleanup costs and natural resource damages beyond the federal limit.**

Response GP49-5

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP50, Avery, Jean

Comment GP50-1

Environmental Health—Impacts on Resources
Comments on Westway/Imperium Expansion Project in Grays Harbor Draft EIS
by Jean M. Avery
Text is from DEIS (**boldface added**). *My comments are in italics.*

In my view, this whole enterprise seems like Russian roulette! – hoping that catastrophes will not happen. Many times over, the DEIS states that incidents cannot be prevented or fully mitigated. To proceed with the proposed action plan in the face of these high risks is basically choosing to accept the consequences and live with the damage: *very high cost for what gain?*

Plants, animals, ecosystems, and humans could be adversely affected.

The DEIS states that "ground water could be contaminated and drinking water is at risk" – and there is no mitigation.

As stated many times in the DEIS, **"no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill ."** FYI, thirteen (13) incidents are documented in chapter 4.7 pages 17-18 of the DEIS.

Response GP50-1

For more information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework.

Comment GP50-2

4.7-1 4.7-2	High: **Ground water could be contaminated and drinking water is at risk**	Re: Water In water, spilled materials can spread quickly Spills into adjacent surface waters or onto the ground at the project site, along the PS&P line, or in the harbor **could contaminate marine and inland waters, associated wetlands, and underlying groundwater.** The spilled material could expose aquatic and terrestrial plants and animals, aquatic habitats, shorelines, sediments, and humans to contamination. This could contaminate municipal and private drinking water wells and other types of wells (e.g., irrigation, industrial supply). Contaminants could degrade surface water quality and potentially affecting aquatic life in those resources. **The PS&P rail line runs through several areas underlain by largely unconfined surficial aquifers, which lie only a few feet below land surface** and extend to a depth no more than 100 feet.

Response GP50-2

The comment repeats text from the Draft EIS.

Comment GP50-3

4.7-4		If a larger-scale spill occurred along the PS&P rail line, contaminants could enter waterways at numerous crossings and drain to the Chehalis River, and eventually into Grays Harbor.

Response GP50-3

The comment repeats text from the Draft EIS.

Comment GP50-4

4.7-2 4.7-19	High	Re: Plants Crude oils and heavy refined oils can destroy plant tissues. 3 to 5 years is a typical recovery period for salt marshes This affects the base of the estuarine and marine food web, which can result in broader ecological damage. A spill could destroy plants' ability to photosynthesize ***(which affects air quality as well).*** Fire can result in plant mortality as well. High intensity fire can sterilize the soil and delay vegetation recovery, affecting community structure and function. Reduced vegetation cover after a fire can accelerate soil erosion and sedimentation.

Response GP50-4

Comment acknowledged.

Comment GP50-5

4.7-5 4.7-6 4.7-7 4.7-8 4.7-19 4.7-20	High threats to wildlife	Re: Animals Animals can be affected in water, on the shoreline, and on land. Constituent compounds within oil (e.g., polycyclic aromatic hydrocarbons) can be acutely toxic to animals and cause death by contact or ingestion. Toxic effects include immunosuppression, skin irritation or ulceration, adrenal system damage, and behavioral changes, which could ultimately lead to death. ***Other gruesome details are covered in this section and in Table 4.7-1.*** Animals would also be affected by fire. Species that could be affected include: Fish Crabs, shellfish double-crested cormorants pied-billed grebe, belted kingfisher Caspian tern Western sandpiper, Dunlin, and Sanderling Bufflehead ducks and common goldeneyes common mergansers harbor seals sea lions killer whales sea turtles humans! (Yes, we can suffer mucous membrane inflammation from the oil or its fumes) pink-footed shearwater black footed albatross northern fulmar beavers river otters bald eagles (can be exposed by feeding on injured or dead fish) clams, mussels, barnacles, snails algae and plankton salmonids protected under the Endangered Species Act migratory birds frogs

Response GP50-5

The comment repeats text from the Draft EIS.

Comment GP50-6

4.7-8 4.7-9	High threats to ecosystems	Re: Ecosystems that could be affected: Ecosystems in the study area support a variety of animals, including several sensitive species. U.S. Fish and Wildlife Service has designated critical habitat in several areas along the PS&P rail line. The Washington State Department of Natural Resources' Chehalis River Surge Plain Natural Area U.S. Fish and Wildlife Service's Grays Harbor National Wildlife Refuge

Response GP50-6

The comment repeats text from the Draft EIS.

Comment GP50-7

4.7-11 4.7-20	High impact on aesthetics	Re: Aesthetics A spill could degrade the visual quality of surrounding landscapes including both terrain and waterways Removal of oil and cleanup efforts on land and water is difficult and time-sensitive, and residual visual effects (e.g., leftover oil slicks or sheens, increased erosion from void of vegetation) **may remain after cleanup operations.** Aesthetics would also be affected by fire.

Response GP50-7

The comment repeats text from the Draft EIS.

Comment GP50-8

4.7-12 4.7-20	High interruption of recreation – up to months or years.	Re: Recreation A number of recreational resources (i.e., city and state parks and natural areas) offering a variety of recreational opportunities (e.g., fishing, bird-watching, boating, etc.) are available throughout the study area. A large oil spill could degrade the environment and preclude the use of recreational resources from the site of the release to throughout the extent of the spill. Recreation would also be affected by fire. **Recreational activities could be restricted from the affected area for months, and in some cases years.**

Response GP50-8

The comment repeats text from the Draft EIS.

Comment GP50-9

4.7-12 4-7.13 4.7-21		Re: Cultural Resources and Tourism Tourism could decline (evidence: the Exxon Valdez oil Cultural and archaeological resources could be affected by spills and fire.

Response GP50-9

The comment repeats text from the Draft EIS.

Comment GP50-10

4.7-14 4.7-21	Risk to tribal way of life	Re: Tribal Resources Tribal fishing resources could be affected Grays Harbor is home port for fishing vessels in ocean fisheries, and this is where fishers offload catch for these fisheries. Quinault also manage razor clams for commercial and subsistence harvest on beaches on and off the reservation adjacent to Grays Harbor. Fire could also result in the exclusion of tribal members from traditional areas during incident response.

Response GP50-10

The comment repeats text from the Draft EIS.

Comment GP50-11

4.7-15	High risk to human health	Re: Human Health Humans could be affected by spills or burning of oil: Inhalation of vapors resulting from exposure to a spill can cause irritation of the respiratory system. A potential health risk is posed from the inhalation of high concentrations of hydrogen sulfide released into the air Concentrations (well in excess of 10 ppm) could be immediately dangerous to workers due to respiratory paralysis. At levels between 700 and 3,000 ppm, benzene can cause drowsiness, dizziness, rapid heart rate, headaches, tremors, confusion, and unconsciousness. When crude oil is burned it emits chemicals that affect human health.

Response GP50-11

The comment repeats text from the Draft EIS.

GP51, **Avery, Jean**

Comment GP51-1

Cost-Benefit Analysis
Comments on Westway/Imperium Expansion Projects Draft EIS by Jean M. Avery
Text is from the DEIS (**boldface added**). *My thoughts are in italics.*

Note: The scope of the DEIS's analysis is limited to potential costs and benefits to residents of Hoquiam.

Page	Risk?	Concern
7-31		*The number of jobs created is quite low.*

		Construction of Phase 1 of the proposed action would support 82 direct jobs at the job site and an additional 211 indirect jobs **anywhere in** Washington. During **operations**, ECONorthwest (2014) estimated that 11 direct jobs would be supported at the terminal if only Phase 1 infrastructure were operational, and an additional 4 direct jobs would be supported at the terminal if both Phase 1 and Phase 2 infrastructure were operational. This excludes vessel and rail transportation direct jobs.
7-34, 7-35, 7-36, 7-37		Other costs include: • increased train traffic, with increased risks of accidents at grade crossings • increase safety risks (e.g., storage tank failure, train derailments, and vessel collisions) that could result in harm to both humans and the surrounding environment • the implementation and maintenance of emergency preparedness and response protocols intended to mitigate adequately the risks related to the proposed action • reduction in property values by making surrounding properties less desirable

Response GP51-1

Comment acknowledged.

GP52, Avery, Jean

Comment GP52-1

Economics Comments on Westway/Imperium Expansion Project in Grays Harbor Draft EIS by Jean M. Avery Text is from DEIS (**boldface added**). *My comments are in italics.*		
Page	**Risk?**	**Concern**
7-6 7-7		*It's important to realize that the money is not all going to the state or county.* FYI: $14.2 million (52%) of non-labor costs would be spent out of state. The relatively low share of in-state non-labor spending reflects the need to import specialized equipment manufactured outside Washington. Essentially, all business taxes and net business income related to onsite operations and income earned by rail and vessel operators would leave Grays Harbor County and **would not result in regional employment or income.**
7-7		*The job numbers are not very high.* At full buildout, the proposed action would generate an estimated 36 direct jobs in Grays Harbor County associated with onsite operations (by

		the applicant), rail transport (by PS&P), and vessel transport (by vessel operators). The proposed action would generate an estimated 73 jobs throughout the County's economy. These jobs would account for $3.6 million in annual direct labor.

Response GP52-1

Comment acknowledged.

GP53, Avery, Jean

Comment GP53-1

Social Policy

Comments on Westway/Imperium Expansion Projects Draft EIS by Jean M. Avery

Text is from the DEIS (**boldface added**). *(My thoughts are in italics.)*

It seems the DEIS identifies many what-if's, but fails to address these scenarios as real concerns. If these what-if's came to pass, they ***would affect*** *the communities near the proposed terminals. And although the proposed mitigation could alleviate some of the impacts, the adverse impacts would likely remain unavoidable and significant.*

Page	Risk?	Concern
7-10		FYI: The project site is located within the city limits of Hoquiam and Aberdeen along the industrial waterfront at the Port. Land on and directly surrounding the project site is designated and zoned for industrial use. FYI: Social policy addresses community cohesion, community welfare (physical and mental well-being), population growth, and minority and low-income communities. Community welfare analysis identifies the factors that influence the existing sense of welfare in the study area, such as living in a healthy and safe environment and relatively easy access to public amenities and services.
7-20, 7-21, 7-22, 7-10, 7-23, 7-24	More what-if's. Higher impact for some communities than for others. Also covered in Chapter on Vehicle Traffic and Safety.	Per the DEIS, it is not possible to predict when trains would be traveling to and from the project site or what time of day a train may pass by and the potential impacts. • Operation of the proposed action **would affect** community cohesion if activities were to bisect, disrupt, or isolate any established communities… • The increased [rail] traffic **would affect** community cohesion if it were to block or obstruct access to important community resources. • Operation of the proposed action **would affect** community welfare if it were to substantially degrade air quality, increase noise, reduce access to parks and recreational uses, or reduce property values. • Onsite operation **would affect** community cohesion if it were to block or obstruct access to important community resources….

		Loading of tank vessels at the Terminal 1 dock could disrupt fishing activities adjacent to the dock. • The PS&P rail line intersects Centralia, Fords Prairie, Ground Mound, Rochester, Elma, and Aberdeen, where it divides portions of these communities. When a train is traveling through this corridor, access from one side of the town to the other can be temporarily blocked. There are some locations along the PS&P rail line where access is completely blocked by a passing train, with no alternative routes….There are locations in Aberdeen and Hoquiam where vehicle delay and access would notably worsen: Port of Grays Harbor and Olympic Gateway Plaza. • Access into the Olympic Gateway Plaza and the industrial area near the project sites would also substantially worsen. Although the proposed mitigation in Section 3.16 could alleviate some of the impacts, **the adverse impacts would likely remain unavoidable and significant.**
7-13	Also covered in Recreation chapter	FYI: Grays Harbor encompasses many recreational areas, including several state and local parks and designated wildlife areas. Fishing, shell-fishing, bird and wildlife viewing, hiking, and boating are popular recreational activities throughout the harbor. Per EIS, most of Grays Harbor's recreational areas are on the western half of the harbor. The proposed project area is on the North and East side of the Harbor. (See map on 7-18.)
7-13, 7-14		(As noted in chapters on Recreation and Tribal Resources), existing deep-draft vessel traffic currently does cause some disruption to recreation boaters and fishers and tribal and commercial (treaty and nontreaty tribal) fishing.
7-13, 7-14	High	Per the EIS, the project site does not have significant documented concerns with air quality or water quality…. However, closest to the project site, there are areas that experience some exposure to increased train noise and environmental health and safety risks associated with the existing industrial facilities and residents **and some risks of incidents.** *I'm concerned with the first statement, which minimizes the impact.*

7-15, 7-26, 7-27	High – especially for minority and low-income populations	The proportions of minority and low-income populations in the study area communities are higher than at the state and county level, with the most meaningful differences occurring closer to the project site and around the harbor. . . . . **Any impacts would disproportionately affect minority and low-income populations.** Nearly half (31 of 57) of the census block groups in the study area have minority populations that exceed their respective county levels. Minority populations account for 19.1% of the Grays Harbor population. 31 of the 43 census block groups along the PS&P rail line are considered minority and/or low-income populations. 15 of the 22 census block groups along the Grays Harbor shoreline are considered minority and/or low-income populations. (FYI, the EPA considers impacts on minority populations to be disproportionate if the minority population exceeds 50% of the study area population, or if the minority population percentage of the study area is meaningfully greater than the minority population percentage in the general population of the study area.) *We may want to look more closely at the exact numbers.*

Response GP53-1

Final EIS Chapter 4, *Environmental Health and Safety,* includes additional mitigation measures to reduce risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP53-2

7-19	FYI only	Per EIS, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). *I'm not sure this is relevant.*

Response GP53-2

Refer to the Master Response for Baseline and No-Action Alternative for a discussion of the baseline used in the analysis and a description of the No-Action Alternative.

Comment GP53-3

7-19	Unanswered What-if's	Per EIS, construction of the proposed action would affect community welfare **if** it were to substantially degrade air quality, increase noise, reduce access to parks and recreational uses, or reduce property values.

Response GP53-3

Comment acknowledged.

Comment GP53-4

7-19	High – but minimized in EIS. More in Air Chapter	Construction of the proposed action could result in emissions of toxic air pollutants, primarily associated with diesel particulate matter, **a known human carcinogen**. Per the EIS, this would only be short-term and intermittent. *What is an acceptable amount of carcinogens??* Per EIS, off-site exposure would likely be well below any level of concern based on the level considered acceptable for permitting new stationary sources of toxic air pollutants in Washington State.

Response GP53-4

As described in Draft EIS Chapter 3, Section 3.2, *Air*, based on air quality modeling for conducted by the applicant, onsite emissions of toxic air pollutants under the proposed action would be below the state thresholds identified in WAC 173-460-150. These emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and applicant mitigation that would reduce potential impacts on air quality.

Comment GP53-5

7-20	More in Noise and Vibration Chapter	Construction noise would likely be audible in nearby residential areas and recreational uses. However, per EIS, the levels would relatively low level and are not expected to adversely affect the surrounding these areas. *Does EIS minimize?*

Response GP53-5

As noted in Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*, increased noise from construction is anticipated to be low. Therefore, mitigation is not recommended.

Comment GP53-6

7-20	More in Aesthetics, Light, and Glare	Construction can also affect community welfare by temporarily lowering property values during construction. Specifically, potential buyers may find a property less attractive if views are altered by the visible and audible presence of construction equipment and activity. However, per EIS, views of the project site by residents are relatively limited and consist of elements that are already industrial in nature. *Again, EIS seems to dismiss and minimize the impact.*

Response GP53-6

As noted in Draft EIS Chapter 3, Section 3.7, *Noise and Vibration,* potential aesthetic impacts during construction would be low. Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*,

acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

Comment GP53-7

7-20		Because the period of construction is relatively short (10 to 12 months), it is expected that construction workers would commute from nearby communities. *So, perhaps the local community would not see a big increase in jobs.*

Response GP53-7

Projected job increases are presented in Draft EIS Section 7.1, *Economics*.

Comment GP53-8

7-21	Also in Tribal and Vessel Traffic Chapters	Onsite operations **would** reduce access to fishing areas immediately adjacent to the dock as result of increased frequency of vessels docked at the Terminal 1 berth.

Response GP53-8

Comment acknowledged.

Comment GP53-9

7-22	Also in Recreation chapter and Tribal chapter	Per EIS, recreational fishing and pleasure boating occurs throughout the harbor and . . . **small vessels could easily navigate away from tank vessels in transit.** *Is this really true? Or would the small vessels avoid using the harbor altogether?* Per EIS, proposed mitigation providing advance notice of incoming vessels could help reduce potential conflicts, but would still likely result in some disturbances.

Response GP53-9

As described in Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, fishing vessels and recreational boaters must obey the navigational rules (Inland Navigation Rules at 33 CFR 83) to give way to the larger commercial vessels that are limited to the navigation channel. Current vessel traffic includes a mix of large commercial vessels and smaller fishing and recreational vessels. The addition of one tank vessel transit per day under the proposed action is not expected to result in traffic impacts with fishing and recreational vessels.

Comment GP53-10

7-23, 7-24, 7-26	High. Also in Environ. Health & Safety and Oil Spills chapters	Increased rail traffic related to the proposed action could also affect local communities as the result of the increased risk of train incidents. The environmental outcome of larger incidents (e.g., oil spills associated with storage tank failures) would be substantially different compared to the no-action alternative. This is because of the potential for additional harmful substances (e.g., crude oil) to enter the environment… If crude oil entered the environment, environmental degradation could occur that could adversely affect humans and the natural environment. Per EIS, **no mitigation measures would eliminate the possibility of a large spill or explosion, nor would they eliminate the adverse consequences of a large spill or explosion.** Additionally, the perception of increased risks and concerns over the potential for environmental damage may also cause some individuals concern they would otherwise not have related to these risks. (The impacts on property values are discussed in Section 7.3.3.2, Fiscal Revenues to the City of Hoquiam.)
7-24	High. *Mitigation is not sufficient.* *Perception matters.*	No mitigation measures would eliminate the possibility of a large spill, fire, or explosion, nor would they eliminate the adverse consequences of a large spill, fire, or explosion. These impacts, should they occur, **could shape the perception** that the communities in the study area are unsafe, unhealthy, or undesirable. These perceptions could affect community welfare **whether or not** there is a measurable impact on community resources or a substantial increase in risks related to the proposed action.
7-25	*Important to note re: job numbers.*	Operation of the proposed action would [create] an estimated 36 direct [plus 73 indirect] jobs in Grays Harbor County. It is more likely [the jobs] would be filled by current residents or by **workers living outside the area** (as would likely be the case with rail and vessel operators). *I.e., even in operation mode, very few new jobs would be created for current residents of Grays Harbor residents.*
7-26	See also Tribal Resources chapter	Any large releases with the potential to enter the harbor from the project site could disproportionately affect minority and low-income populations in these areas. Tribes would also be affected.
7-27	Some areas would be more affected	Traffic delays at certain intersections could disproportionately affect minority and low-income populations in communities immediately surrounding the affected areas.

Response GP53-10

Refer to Response to Comment GP53-1.

GP54, Avery, Jean

Comment GP54-1

Re: Tribal Resources The DEIS includes many significant what-if's: potential impacts of the project on the tribal communities and their livelihood. However, the DEIS seems to assume that these what-if's won't happen. I believe the DEIS needs to be rigorous in its assessment and review of the potential consequences of the project. I personally am not as familiar with tribal culture as others may be. I understand that Ms. Maia Bellon may have more knowledge in this regard.

Response GP54-1

The commenter does not provide sufficient details to allow for a response.

Comment GP54-2

Tribal Resources Comments on Westway/Imperium Expansion Projects Draft EIS by Jean M. Avery Text is from the DEIS (**boldface added**). *My comments are in italics.*		
F*YI: Tribal resources refer to the collective rights and access to traditional areas and times for gathering resources associated with a tribe's sovereignty or formal treaty rights (per federal and state laws). These resources may include plants or fish used for commercial, subsistence, and ceremonial purposes. Tribal fishing resources include catch in freshwater, Grays Harbor, and ocean fisheries. The tribes in this area are Quinault and Chehalis tribes; there are some differences in how these two tribes are impacted*.		
Page	**Risk?**	**Concern**
S-34	High *The EIS should be more rigorous in assessing risks to tribal resources overall.*	Mitigation would reduce but not completely eliminate impact on tribal resources. Vessels would travel through fishing areas in Grays Harbor. Increased vessel traffic could restrict access to tribal fishing areas. Also, no mitigation measures would completely eliminate the possibility of impacts on fishing resources due to vessel operations. *This chapter sounds vague and contradictory. Also, it seems the DEIS avoids discussing the direct impact to tribal resources – saying that impact to tribal resources depends on impact to water, earth, etc.*

Response GP54-2

The commenter does not provide sufficient details to allow for a response.

Comment GP54-3

3.12, p. 4	High *It seems the DEIS minimizes the impact.*	The waters of Grays Harbor, the Chehalis River, and other streams entering Grays Harbor are important fishing areas for Native American tribes in the region. The Grays Harbor shores continue to be productive hunting and plant-gathering areas.

Response GP54-3

The commenter does not provide sufficient details to allow for a response.

Comment GP54-4

3.12, p. 5	High	Quinault fishers are dependent on Grays Harbor to access ocean fisheries, because [their] villages lack a harbor. Grays Harbor nourishes other species of fish important to the Quinault fisheries, such as white sturgeon and Dungeness crab. Quinault weavers have gathered materials from the Grays Harbor area for many generations.

Response GP54-4

The comment repeats text from the EIS.

Comment GP54-5

3.12, p. 6	High	Preservation of tribal land and culture is essential for the perpetuation of the Chehalis people. The importance of the land to the tribe cannot be overstated. It provides the living space, sacred and cultural sites, and natural resources that sustain the Chehalis people and culture. [The land] provides spiritual and physical sustenance, and the means for economic self-sufficiency. Many tribal members hunt and fish to supplement their incomes (commercial harvest), to provide sustenance for their families, and for cultural reasons (subsistence and ceremonial harvest).

Response GP54-5

The comment repeats text from the EIS.

Comment GP54-6

3.12, p. 17 3.12, p. 7 3.12, p. 16	High *The DEIS seems to gloss over the what-if's (listed on the right).* *The DEIS sounds contradictory when it says the tribal*	Construction could have an impact on tribal resources…**IF**… • . . . **IF** construction activities were to limit access to or degrade the resources used by the tribes -- including plants and fisheries described in other sections (re: earth, water, animals, and plants). • . . . **IF** Construction could degrade the fishery • . . . **IF** construction were to impair water quality • . . . **IF** construction produced vibration levels from pile driving that would be harmful to fish in Grays Harbor But, construction would have no impact on tribal resources???? (as stated at the end of the section). *This sounds contradictory.*

	resources are "essential," but that construction "would have no impact."	FYI: the Chehalis own tidal land in Grays Harbor and use it for recreational shellfish harvesting. The tribe plans to make it a commercial operation in the future.

Response GP54-6

The referenced bullets represent the mechanisms through which construction activities could affect tribal resources. They are presented to frame the discussion that follows.

Comment GP54-7

3.12 , p. 18 3.12, p. 11	High *The DEIS minimizes how huge vessels could easily squeeze out the tribes' small boats and low-tech fishing nets.*	Onsite operations could reduce access to tribal fishing areas as result of the increased frequency of vessels docked at Terminal 1. FYI, tribal fishers deploy gillnets and drift…. Fishers deploy gear one boat at a time, releasing their net beginning from the bank and extending across and in some cases into the navigation channel. The boat and net then drift with the current. During peak periods of the fall fishery, up to nine boats may be actively fishing the navigation channel near and in front of the terminals…. Fishing nets are marked at each end by orange or red marker buoys during daylight hours. When fishing occurs at night, nets are marked at each end with a steady white or flashing white or red light. While a vessel is at berth, fishing nets cannot be extended as far and cannot access the areas nearest to the dock structure where fish are assumed to be concentrated. When a vessel is docked, fishers must either shorten their drift or move farther out into the navigation channel to avoid the vessel. FYI: The typical 550-class tank barge is approximately 600 feet in length.

Response GP54-7

Comment acknowledged.

Comment GP54-8

3.12, p. 19	High	Increase in rail traffic could have an impact on tribal resources **IF**. . . • **IF** it were to reduce access to tribal fishing fleets, boat launches, and net sites as a result of delays at crossings • **IF** it were to degrade the fishery through water quality impacts. ***The DEIS seems to assume that these what-if's won't happen.***
3.12, p. 20		An increase in vessel trips could have an impact on tribal resources IF… • IF it were to degrade water quality

		• IF it were to reduce access to tribal resources, including the plants and fisheries.

Response GP54-8

The referenced bullets represent the mechanisms through which rail and vessel traffic could affect tribal resources. They are presented to frame the discussions that follow.

Comment GP54-9

3.12, p. 21 3.12, p. 18	High *Some of the DEIS comments sound contradictory.*	However, Inbound and outbound vessels could disrupt access to the Quinault's ocean crab and marine fisheries because ocean fishing vessels prefer to use the navigation channel to transport the catch into the harbor. <u>It is likely this disruption would be minor because smaller Quinault fishing vessels would have the ability to skirt around or adjust their time to avoid the transiting tank vessels.</u> *This sounds disruptive to me…How small are the fishing boats, compared to the huge vessels.* FYI: The typical 550-class tank barge is approximately 600 feet in length and a maximum of 78 feet wide and is assisted by a tug that is approximately 127 feet long and a maximum of 42 feet wide. A Panamax class tanker has a maximum overall length of 950 feet and a maximum width of approximately 106 feet.

Response GP54-9

The referenced text has been clarified. The larger fishing vessels would need to adjust their time of travel when a tank vessel is transiting the navigation channel.

Comment GP54-10

3.12, p. 20		Vessels related to the proposed action would be most likely to affect tribal fishing during the fall salmon management period, when more fishers typically deploy drift gillnets in the navigation channel….During peak periods of the fall fishery, up to nine boats may be actively fishing this area and two to four fishers with nets deployed at one time. . . . Increased vessel traffic means a greater chance that a vessel could travel through this area and affect tribal fishing.
3.12, p. 22		Vessels would travel through usual and accustomed fishing areas in Grays Harbor. Increased vessel traffic could restrict access to tribal fishing areas in the navigation channel and adjacent to Terminal 1 – mostly with fishing of salmon, steelhead, and sturgeon.

Response GP54-10

The comment repeats text from the EIS.

GP55, Avery, Jean M.

Comment GP55-1

I submitted comments previously, but have two more comments after reading today's newspaper (The Columbian, 11/23/15): - My earlier comments included concerns about impacts on fishing in the area of Grays Harbor. Today's article states that the Quinault's tribal fishing area in Grays Harbor is "one of the few spared by a toxic algal bloom on the Pacific coast." Let's not put that at risk with potential oil spills. - My earlier comments included concerns about the safety of rail transport. Today's article states that "as many as 19 mile-long trains carrying crude oil roll through the state each week." (That number is before any additional volume of oil would be transported.) That is a lot of exposure to possible spills, accidents or -- heaven forbid -- terrorist activities.

Response GP55-1

Comment acknowledged.

GP56, Bachelder, Karen

Comment GP56-1

My name is Karen Bachelder. I'm from Seattle, but I have spent a lot of time enjoying Grays County and I plan to continue to do that. I want to address the piece of EIS that relates to some of those critical risks and I'm going to ask you to translate those risks, because I think the EIS is reporting three -- kind of three. I'm going to say three.

One is higher than average likelihood of immediate spill during vessel loading which would likely reach water with serious, if not severe potential environmental effect.

A medium or moderate likelihood of a large rail transport spill equal to three rail cars likely reaching with a serious environmental effect.

And thirdly, from the EIS, medium to moderate likelihood of large spills from vessel collisions with a high likelihood of oil reaching water and having a severe impact.

Now, the EIS goes on to say that no mitigation measures can be implemented that could eliminate the possibility of a large spill nor any mitigation measures that could eliminate the adverse consequences of a large spill.

So given the likelihood of these things happening and these adverse effects coupled with the impossibility for complete mitigation, I see the risk simply too great to warrant the short-term benefits.

I urge the City of Hoquiam and Department of Ecology and stand up to big oil and stop doing business as usual. We have the opportunity right now to move in the direction of reducing our reliance on fossil fuel rather than stand in it.

And I urge you to have the courage to reject these proposals and to work instead on ways to create a future and jobs that uses clean, renewable, and safe energy. We have the technology. We need the political will.

Response GP56-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 to reduce the likelihood of a spill reaching the environment and the potential impacts if an incident occurs at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion.

For more information about the development, adequacy, and enforcement of mitigation, refer to the Master Response for Mitigation Framework.

GP57, Baker, Brandon

Comment GP57-1

As someone who loves the outdoors and especially fishing, the thought of what might happen with an accident with these new and expanding terminals breaks my heart. The tiny amount of new jobs compared to the risk to the environment, as well as the tourist and commercial fishing industries is not worth it. I would imagine one clam tide has a bigger impact on the local economy here than what these projects would bring in economic activity to this area. Building this kind of project in an area prone to bad storms and earthquakes is a terrible idea. And that isn't even taking into account what might happen to the lives of the people who live alone the train tracks if an accident might happen. All I see are risks for the community with very little reward. Please do not let this go forward.

Response GP57-1

Comment acknowledged.

GP58, Ballo, Dennis and Julie

Comment GP58-1

November 17, 2015

Westway and lmperium Expansion project EISs c/o ICF International 710 Second StRECEIV ED NOV Z 0 2015 Suite 550

Seattle, WA 98104

In order to ensure the safety and health of our environment in Grays Harbor, we are opposed to the oil terminal projects proposed in Grays Harbor, for the followings concerns: One of the biggest, busiest fishing harbors

Known for the best salmon, crab, oysters and razor clams

One of the most popular recreation areas with pristine beaches

Why would we even think of taking a chance on ruining this area with the chance of oil spills and train derailments along the rivers and ocean. The rail system has had numerous '"oil car derailments" in the USA and Canada, with a poor clean up record to the environment. My wife and I go down to Grays Harbor Area six or seven times a year, please continue to protect the area for our Family and future generations. Sincerely, Dennis and Julie Balla 4307 301st Ave N E Sammamish, WA 98074

Response GP58-1

Comment acknowledged.

GP59, Ballo, Kristi

Comment GP59-1

11-30-2015 Westway & Imperium DEIS's comment I am commenting on the Westway and Imperium DEIS's. These proposed projects are the worst possible types of industry for this environmentally sensitive area given the wildlife that use the bay as a nursery, the salmon that pass through here to get to their spawning grounds. the birds that stop over in the Harbor during their migrations and the businesses that rely on this clean water natural resource for their livelyhoods.

Response GP59-1

Comment acknowledged.

Comment GP59-2

These DEIS's are filled with errors, fictionalized stats and inaccurate depictions of the project and it's potential impacts. 1. The omission of comments and the subsequent fix for that situation still did not include any reference of the analysis to comments. Even after pointing out the omissions our letter was not found and possibly that is because there are 2 different addresses for the same place one is a street which is incorrect instead of ave. This mistake is repeated several more times in the DEIS's.

Response GP59-2

The co-leads reviewed and considered all scoping comments. Final EIS Appendix A, *Scoping Comments*, provides a catalog of all comments received during the formal scoping period.

Comment GP59-3

2. The lack of factual information is criminal. The modeling is done with a type of oil that is not even proposed for these facilities. Tar sands or heavy crude should be what the modeling is based on. The speed of the currents in the bay are also not true, many times a year current speed exceed the 1 or 1.5 knot model and 3 knots is common over 100 times per year. It also states that marine mammals don't enter the bay but usually stay 3 miles off shore. This is a total farce, Grey whales can be found inside the bay during certain times of the year and Sea Lions and Harbor Seals can be found in the bay year round.

Response GP59-3

Draft EIS Appendix N, *Oil Spill Modeling*, presents data from ADIOS at the 48-hour mark to easily compare with the GNOME mass balance estimates at that same period. This comparison provides a better representation of the behavior of Bakken crude oil or diluted bitumen (dilbit), which can be modeled using ADIOS but not GNOME, in the environment.

Refer to the Master Response for Oil Spill Modeling Methods, which addresses the applicability and selection of the three models used as part of the oil spill modeling effort: GNOME, ADIOS, and Hydrologic Engineering Centers River Analysis System (HEC-RAS). It was determined that these models provided sufficient analytical capabilities for the purposes of evaluating spill scenarios for the Draft EIS. GNOME, specifically, was selected to complete the oil spill trajectory analyses because it is a commonly accepted industry standard for contingency planning, scenario analysis, and oil spill response used by the National Oceanic and Atmospheric Administration, the U.S. Coast Guard, and the Washington State Department of Ecology.

Draft EIS Chapter 3, Section 3.5, *Animals,* acknowledges that marine mammals are frequently observed in Grays Harbor, and discusses sea lion and harbor seal use of Grays Harbor. The Final EIS section clarifies whale use of Grays Harbor and provides additional information on gray whale, humpback whale, and killer whale.

Comment GP59-4

3.Vessel refueling hazards are not included in DEIS and these present a very real and significant danger for a spill.

Response GP59-4

Final EIS Chapter 2, *Proposed Action and Alternatives*, clarifies that proposed operations would not include vessel bunkering (fueling) at the project site. Final EIS Chapter 4, Section 4.6, *Environmental Health Risk—Vessel*, and Chapter 5, *Extended Rail and Vessel Transport*, reflect additional information about federal and state regulations related to bunkering operations.

Comment GP59-5

4. The USF&W point out in their comments “the cost benefit analysis included in the draft EIS’s fail to acknowledge or consider significant impacts, damages or costs”. They also state that these projects present “unacceptable risks” concerning risk assessment in the likelyhood of a vessel spill.

Response GP59-5

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns*, reflects a fuller discussion of the range of costs that can result from a crude oil spill. Information about the potential consequences of such an event is provided in general terms consistent with the approach described in the Master Response for Environmental Health and Safety Analysis.

Comment GP59-6

5. There is no mitigation for an oil train fire, evacuation is the only certified response plan in such an event.

Response GP59-6

Comment acknowledged.

Comment GP59-7

6. All three of the oil terminal proposals should be considered together as they are all doing the same thing on the same tracks in the same geographical location. This is the only way to measure the true and total impacts of these projects on the environment and our communities.

Response GP59-7

Draft EIS Chapter 6, *Cumulative Impacts*, presents the potential impacts of the proposed action and the REG (formerly Imperial Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project.

Comment GP59-8

7. We have experienced an increase of erosion on our shorelines from the Army Corps of Engineers Deep Draft project. There are no measures in the DEIS for mitigation of potentially greater erosion with an increase of vessel traffic especially of such large and heavy vessels.

Response GP59-8

As described in Draft EIS Chapter 3, Section 3.1.5.2, *Proposed Action*, proposed action vessel trips would result in a small, incremental increase in the potential for impacts associated with wake compared to the no-action alternative. Final EIS Section 3.1.5.2 provides additional explanation of the basis for this conclusion.

Comment GP59-9

In conclusion this DEIS was poorly put together and one can only assume that this was intentional given the abundance of mis-information and fictional statistics. DEIS is meant to be informative and accurate this is not and was put together in an overly large volume of what can only be described as deceiving and confusing information. This seems intentional and should be grounds for dismissal for not honoring the intent of the process.

Response GP59-9

The commenter does not provide sufficient details to allow for a response.

Comment GP59-10

The omission of comment letters and the analysis of reference materials constitutes fraud on the part of the entity charged with preparing the DEIS.

Response GP59-10

The co-leads reviewed and considered all scoping comments. Final EIS Appendix A, *Scoping Comments*, provides a catalog of all comments received during the formal scoping period.

Comment GP59-11

Even a small spill will have disasterous affects on our business. Seafood is already heavily scrutinized for contaminants and the publicity from even a small spill will hurt us if not completely put us out of business. Regards, Kristi Ballo Brady;s Oysters inc, Owner 3714 oyster pl Aberdeen, WA 98520 360-268-0077

Response GP59-11

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* reflects additional information on the economic and social costs of oil spills. This includes information on accidents and spills, and information on crude oil spill during marine transport.

GP60, **Ballo, Mark**

Comment GP60-1

Is it too much to ask that the agency conducting these comment periods at least provide a real address or that they make up their minds is it 2nd Avenue or 2nd Street? 2nd street is the address I have sent my letter but i will send another to 2nd Avenue. Both are sited in the DEIS this only highlights the incompetence of the ICF INternational or is confusion the goal?

Response GP60-1

The address was corrected in the Draft EIS files and the updated files were reposted to the Ecology website. The U.S. Postal Service confirmed that comments addressed to Second Street would be delivered to Second Avenue. Comments addressed as such were received.

GP61, **Ballo, Mark**

Comment GP61-1

Westway/Imperium DEIS Comment Thursday, November 5, 2015 at 10:56 am

This EIS is quite possibly the worst one I have ever encountered. It is filled with a lot of non-essential junk and filler and doesn't even address all the issues that these projects present. This appears to be an attempt to make digesting the important and essential information both difficult and excessively time consuming for the general public who by the way this is intended for.

Not all the scoping comments were listed in the appendices also making this a difficult task. It seems all too coincidental that many of the primary resource users were the ones left off the appendices.

Response GP61-1

The co-leads reviewed and considered all scoping comments. Final EIS Appendix A, *Scoping Comments*, provides a catalog of all comments received during the formal scoping period.

Comment GP61-2

First of all the area included in the EIS doesn't adequately include areas potentially impacted that a spill further away would not have significant impacts for us on the coast is incorrect. A spill further away than 59 miles along the Columbia River would still impact us out on the coast. A spill would eventually be flushed out the mouth of the Columbia River and be transported up our coast in the prevailing currents.

Response GP61-2

Refer to the Master Response for Oil Spill Modeling Methods and the Master Response for the Geographic Scope of the EIS.

Comment GP61-3

I didn't see any acknowledgement of potential shore line erosion from the increased wave height and frequency that would come with increased vessel traffic and the increased size of the vessels coming and going to and from the terminals. The deep draft project itself has caused problems for shoreline owners and oyster growers. I believe that it should be noted that the oyster growers have been dealing with problems with the Army Corps of Engineers that are associated with the deep draft project for over 20 years now without any resolution, and that is without the proposed increased vessel traffic.

Response GP61-3

As described in Draft EIS Chapter 3, Section 3.1.5.2, *Proposed Action*, proposed action vessel trips would result in a small, incremental increase in the potential for impacts associated with wake compared to the no-action alternative. Final EIS Section 3.1.5.2 explains the basis for this conclusion.

Comment GP61-4

An oil spill would have a disastrous affect [sic] on the 70 something year old Grays Harbor oyster industry. When a best case scenario includes only recovering 5-14% of all oil spilled this cannot be mitigated for, especially for filter feeding shellfish. This document grossly underestimates the negative impacts while over estimating the positive impacts, of which I can think of no positive impacts these projects could produce given their ability to destroy 30% of Grays Harbors economy.

Response GP61-4

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* reflects additional information on the economic and social costs of oil spills. This includes information on accidents and spills, and information on crude oil spill during marine and rail transport. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP61-5

The rate at which the water moves within the bay is incorrect. Almost daily the tidal currents move the water at more than 1 knot per mile, in fact 3 knots is common. This is just an out right [sic] lie. What If the spill occurs on one of many days that the wind blows 15-60 knots?

Response GP61-5

The information presented in Draft EIS Chapter 4, Section 4.3.2.3, *Water Flow*, is intended to generally describe the range of water flow conditions that can occur within the study area. Draft EIS, Appendix N presents the assumptions used relative to wind conditions and water currents within the study area. Wind, tide, and other factors affecting water flow used in oil spill modeling are further described in the notes section of Table 1 (see p. N-5 of DEIS Appendix N) and in the Master Response for Oil Spill Modeling Methods.

Comment GP61-6

As a seller of seafood I know that we are required to have an excessive amount of liability insurance but these companies are allowed to be grossly under insured for the potentially huge damages they can inflict upon us.

Why are local and state governments responsible for cleaning up after these under insured takers? Why are they allowed to be under insured for their potential costs of clean up?

We can figure out new ways to stimulate our economy without doing permanent damage to our environment.

This a bad idea for Grays Harbor no matter how you look at it.

Mark Ballo

3714 Oyster Pl

Aberdeen, WA 98520

Response GP61-6

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP62, **Barkhurst, Ross**

Comment GP62-1

The probablities for large and medium spills, river and bay, are suspect based on real life. For example, there have been several train wrecks on pertinent tracks in the past ten years, yet your PRA implies little or no chance. The discussion on tank ruptures makes it clear that containment

berms cannot hold all tank contents, yet a tsunami or earthquake or sabatoge can clearly rupture such tank(s). The same three events can and would impact train tracks while in use. These tracks and tank farms would need to be designed to a maximum credible event such as the three above. All are credible in Grays Harbor estuary or drainage. Still, maximum credible events are not named or quantified as such. As a result there can be no design basis incident qualification of systems and components whose failure would cause spills. Because of the liklihood of these three events being greater than once in 40,000 years, we have an unreviewed environmental, economic, and personnel safety question here.

Response GP62-1

Refer to the Master Response for Risk Assessment Methods and the Master Response for Seismic Risk and Design Requirements.

Comment GP62-2

Sections on plants and animal effects are written at a grade school level. You mention 7,605 acres of eelgrass and its qualitative importance to animals, for example, however impacts of its loss are never quantified in resource impacts or economic impacts segments. The impacts would be catastrophic. Aquatic vegetation and its resident invertebrates are the base of the food pyramid for salmonids, forage fish, and waterfowl. Two studies relate this in detail, yet contents are missing from this EIS. A multi year study by Wild Fish Conservancy of Grays Harbor Smolt Habitat shows how important scrub/shrub wetlands are to Coho, and aquatic vegetative beds are for Chinook and Chum. The other major estuarine smolt habitat player is shown to be gravel/cobble beds. This EIS correctly describes how vegetative beds will be lost, and gravel/ cobble cannot be cleaned up. These will be wiped out for indefinite, long periods of time, yet deserve no mention in the economic impacts section, or a missing econnoic risks section. The second study is by Baldwin and Lovvorn, 1994. It disusses in detail the use by waterfowl of both species of eelgrass in Boundary Bay, BC. The same major species of waterfowl use Grays Harbor. These are Widgeon, Pintail, Mallard, and Pacific Brant.Of these, three seldom meet North American Waterfowl Management Plan goals. Still, the EIS talks about shorebirds and mentions only mergansers as waterfowl. This EIS must recognize waterfowl and impacts beyond Grays Harbor in order to approximate legitimacy. These must be addressed here, or more appropriately in a new Economic Risks section. Fishing (commercial and recreational) hunting (waterfowl, which is not even addressed) and shorebirds (birdwatching) are at risk but not economically quantified. The nature of these “other” economic and recreational activities is such that they do not risk heavy industrial endeavors, yet the latter constitutes a major as yet unquantified risk to them. The EIS does not look outside local impacts in any meaningful way. Salmon, shorebirds, green sturgeon, and waterfowl are migratory, crossing county, state, and even national boundaries. Grays harbor is a Shoreline of Statewide Significance, yet this does not seem to have impacted the impacts One would not guess this from the inadequate plant and animal impacts section, nor from the missing economic impacts section relative to all other environmentally related economic activities. Grays Harbor environmental health impacts salmonids which do not run up its rivers. For example, at times there are more Chinook smolts in Grays Harbor which originated in the Willapa Bay drainage than there are which originated in Grays Harbor. In both cases these are Coastal Fall Chinook. The portion of this significant unit of salmon residing in these two systems has now been officially declared “overharvested” by NOAA. One would never guess this, nor the environmental, recreational, or economic impact, from this EIS.

Response GP62-2

Draft EIS Chapter 3, Section 3.4.4.3, *Grays Harbor*, describes aquatic vegetation as the base of the food web for other aquatic organisms in Grays Harbor. Section 3.5, *Animals,* recognizes the importance of aquatic vegetation as habitat. Also, Section 3.5, *Animals*, mentions specific waterfowl species or waterfowl in general terms in several locations.

Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action. Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* reflects additional information on the economic and social costs of oil spills. This includes information on derailments and other accidents involving trains carrying crude oil and information on a crude oil spill during marine transport. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7.

GP63, **Barkhurst, Ross**

Comment GP63-1

Please accept this as my summary of my comments #000000480. I ran out of space for a summary. "In summary it is clearly difficult to justify location of a large source of liquid pollutants such as crude oil or petroleum products on an estuary such as Grays Harbor. Mechanical and eletrical components, as well as civil engineered structures, must be qualified to withstand maximimum credible events such as tsunamis, earthquakes, and manmade disasters such as sabatoge. These have not been well defined, if at all, in the EIS. Only train wrecks have been clearly identified, and we are supposed to believe, without justification, there will be no more along the harbor or Chehalis river. Existing economic activities would be at risk, as well as the ecology DOE is supposed to protect. This EIS cannot justify such projects.

Response GP63-1

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

GP64, **Bassett, Beverly**

Comment GP64-1

Good evening. My name is Beverly Bassett, and I live in Olympia, Washington. Scientists tell us that we are deep into irreversible climate change or global warming. When the large ice sheets melt, it will be too late to save life as we know on planet earth.

Last summer was the hottest on earth since records began to be kept more than 100 years ago. And if we don't stop this madness, this fossil fuel madness, each coming summer will be hotter than the last. Before too many years pass, crops will fail, and millions of people and other creatures will perish and die.

Our extraction of toxic fossil fuels is the reason we're burning up our little planet earth, our only home. We will transition to sustainable and renewable sources of energy. Let's do it while there's still a chance that we can mitigate some of this bad as anything could possibly be catastrophe now in progress.

Let's show that we love our children more than we love the bad money that fossil fuels can possibly bring to our local economies. It's time for sanity and reason to prevail. No oil terminals in Grays Harbor County.

Response GP64-1

Comment acknowledged.

GP65, Bayer, John

Comment GP65-1

Oil trains block traffic. They interfere with commerce, emergency response and school buses. The adverse impacts will be significant. There is no practical way to mitigate for blocked traffic.

Response GP65-1

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, addresses potential impacts on vehicle delay and emergency vehicle access. The Final EIS section clarifies proposed mitigation and potential significant and unavoidable impacts.

GP66, Beattie, Will

Comment GP66-1

My name is Will Beattie. I'm a salmon biologist in Olympia, Washington. The final EIS must include a much stronger assessment of the short and long term effects of spilled crude oil on salmon, crab, and other fish and shellfish species and the food they depend on.

It should describe not just the immediate effects of spills, but also the cumulative long-term effects of whether crude oil can persist for years along the shorelines and at the bottom of the bay.

Spill accidents significantly reduces the production of these species for many generations. The final EIS should summarize in much greater detail the large body of scientific research that has proven these effects, including very recently published laboratory studies of oil toxicity and consequence and field studies for spills like the EXXON VALDEZ.

Shellfish are an enormous cultural economic importance locally and regionally. The EIS should count the economic cost and the potential long-term curtailment of commercial fisheries on this species as the result of an accident. Putting species at risk is irresponsible. Please deny the permits.

Response GP66-1

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, addresses the potential long-term impacts associated with exposure to crude oil and includes information specific to potential impacts on shellfish. The likelihood of increased exposure to crude oil under cumulative conditions is addressed in Chapter 6, *Cumulative Impacts*. Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP67, **Beckley, Diane**

Comment GP67-1

Westway and Imperium Expansion Projects

Draft Environmental Impact Statements

Comments:
c/o ICF International

Co-Lead Agencies:
Washington Department of Ecology and City of Hoquiam

11/30/2015

My name is Diane Beckley and I am a resident of Ocean Shores, WA.

[box: I am writing to request you deny any permits or authorization to allow oil terminals storage, and/or transport of oil products into and out of Grays Harbor, WA.]

Many comments have been expressed, and written, about the impact of the proposed expansion of our port facilities to allow great volumes of oil to be transported into the port, and out to numerous other areas. I will focus my comments primarily on the impact to Ocean Shores as I feel our area, and the potential devastation which could occur has been overlooked.

1. Ocean Shores primarily consists of residential (high percentage retirees), small businesses, and tourists. While we currently have close to 6000 residents, we have many lots which people continue to build on because of our beautiful natural environment. During summer season, our town can quadruple in size, with the 4th of July having as many as 75,000 people. The small businesses survive from a small amount of resident business, but a large amount of tourist business. The tourists and residents come primarily for the beaches, the clean air, the fishing and crabbing, and the great waterways we have. Many also come for the unique number of birds which flock to our area.

If a barge or tanker had an accident resulting in oil leaking into the waterways, how would the city of Ocean Shores survive? Property values would plummet, businesses and tourism would die. Who would adequately compensate everyone's losses, clean the birds, the water, and replenish the natural environment?

Response GP67-1

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* reflects additional information on the economic and social costs of oil spills. This includes information on accidents and spills, and information on crude oil spill during marine and rail transport. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis.*

Comment GP67-2

2. The harbor entrance to Grays Harbor has seen its shipping catastrophe's over the years. It is said that entrance is the second most dangerous on the west coast of the USA. I have boated for many years and crossing the "bar" was a wild experience in normal weather. When the weather deteriorates which often happens, the "bar" should not be crossed, and especially not if a ship is pulling a barge.

If a ship or barge had a deadline to meet, how could there be a guarantee that they would not enter or exit the harbor until it is safe to do so? Will there be written instructions that all involved would have to adhere to? How would the losses which could occur be mitigated adequately?

Response GP67-2

Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*, discusses the systems that are in place to manage vessel traffic in Grays Harbor safely. See Chapter 4, Section 4.6, *Environmental Health Risks—Vessel Transport*, for mitigation measures associated with vessel traffic.

Comment GP67-3

3. It has been said that losses can be mitigated with insurance by responsible parties. I have been in the Insurance business for over 40 years. I have seen catastrophes in many states, and have also seen losses which result in entities declaring bankruptcy. The project being proposed is by companies organized as LLC's. These are limited liability corporations. Once these go bankrupt, there is no recourse to ask for compensation from the owners involved who are protected by the LLC. They have very little risk to themselves personally. When bankruptcy occurs, people and business are never adequately compensated. Insurance originally started because of the need for maritime insurance. In those times, many years ago, major oil spills were not a risk that insurance was thought to provide coverage for. Today, after major events such as the Exxon Valdez in Alaska, and BP oil refineries in the Gulf Coast, the catastrophic losses to the environment, properties, and peoples lives and livelihood are now a realistic consideration when allowing commerce.

How can a consulting firm hired by companies wishing to expand, and increase profits, possibly be capable of truly determining the risks and feasibility of an expansion project of this significance? With no criticism intended of ICF International consulting, asking them to know all the risks involved, the devastation (which is extremely probable) which will result in numerous areas of the coast, is like inviting the rooster into the hen house. ICT is being paid by the companies, their goal is to obtain an OK from necessary governmental entities as quickly as possible. How can this be allowed? It must be denied.

Response GP67-3

For information about the independent development of the Draft EIS, refer to the Master Response for Purpose and Focus of the EIS. For information about financial obligations of the applicant and the mechanisms in place to address these concerns, refer to the Master Response for Liability and Responsibility for Incidents.

Comment GP67-4

4. With so much oil coming in to Grays Harbor, being stored in Grays Harbor, and exiting it, I am extremely concerned with the terrorism potential. The volume of oil products being suggested today will only grow in time. Our entire area in Grays Harbor is at great risk from terrorists wanting to disrupt the source of fuel for the USA and shipment to other areas. I know the House of Representatives in Washington DC has Okayed shipment of oil out of the USA for commerce. If the Senate gives an OK, and the President also gives an OK, our risk increases for disrupting shipment to other countries.

Has Homeland Security been asked to review the plans? Have they, or other areas involved in Terrorism prevention been asked to create a plan which involves the degree of possibility, and steps to secure the area and prevent an attack?

Response GP67-4

Refer to the Master Response for Purpose and Focus of the EIS.

Comment GP67-5

5. Currently, the oil tank storage discussed has been for Hoquiam, WA. The rail tracks carrying the oil Will be through many cities and areas in Grays Harbor. The length of trains will increase dramatically, and the delays where the tracks pass through populated areas which include homes and businesses will increase greatly. Because of the current location of tracks, emergency service is already impacted when help is needed and a train is slowly passing through the area. With an increase in number of trains per day, and the number of cars in any one train greatly increasing, there will likely be a negative impact to necessary emergency care.

How will this be prevented? Will new tracks be required away from populated areas before this Project is approved?

Response GP67-5

Draft EIS Section 3.16, *Vehicle Traffic and Safety*, analyzed 81 at-grade crossings along the PS&P rail line and the potential for trains going to or coming from the project site to increase vehicle delay at these crossings, including delay of emergency response vehicles. Section 3.16.7.1, *Applicant Mitigation*, proposes mitigation measures to reduce impacts on vehicle delay. Final EIS Chapter 3, Section 3.16.8*, Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?* clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).

- Peak hour: Washington Street (Port of Grays Harbor area).

Comment GP67-6

6. Currently, Ocean Shores and other coastal cities plan for any necessary evacuations through the Hoquiam and Aberdeen areas. Our only hospital is in Aberdeen, but we must first go through Hoquiam.

If a disaster occurs at the oil storage sites, how ill Ocean Shores and other coastal areas get to the hospital safely? If the oil spill or explosion pollutes the air (which it will) how will those people with lung problems get safely to the hospital in Aberdeen? I lived in Anacortes, when the Shell oil refinery had a fire. The pollution resulted in horrific air quality problems, as well as dead sea life. What are the plans to mitigate this potential for Grays Harbor?

Response GP67-6

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Final EIS Section 4.7 has been revised to more fully describe human health impacts that could occur as the result of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP67-7

7. We live in a highly earthquake and tsunami prone area. The last major (9.0) earthquake was 200 years ago. It has been predicted that our area will experience another major quake in 200 years from the last one. We are at that year prediction now. Ocean Shores, and other coastal cities also are at great risk for a tsunami a short distance off the coast. The Techtonic plate has been active the past years with one plate inevitably colliding with the other plate causing a catastrophic earthquake. Oil should not be shipped or stored in such an unstable area. There are areas in Hoquiam, especially where the port is which are built on land which can turn to liquefaction when an earthquake occurs.

Why would there be any consideration given to build, store, or transport oil in or out of such a susceptible earthquake/tsunami prone area? It makes no sense, except those mostly interested in financial gain, or those wishing a catastrophe to occur. Please deny the permits and do not allow project to go forward.

Response GP67-7

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP67-8

8. Much has been said about improved rail cars, and improvements to train tracks. I've seen no details these changes would prevent spills for sure, or if they would be done before approvals are given. I've also seen no significant changes to ships carrying oil, and the disallowance of barges which are highly at risk crossing the "bar" at the entrance to Grays Harbor. It has been verbally said that things would be done to diminish the risk of an oil spill, but none have stated this would occur before the project can proceed. It has also been implied that risks would be "mitigated".

The DEIS states in several places that mitigation is not possible. If mitigation is not possible, then why is there consideration given to permitting this proposal? It is not possible to mitigate the horrendous risk involved. Therefore, these projects must be denied.

Response GP67-8

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP68, Bedall, Frank H.

Comment GP68-1

Name: Frank H. Bedall
Organization Name (if applicable): Bayfront Owner
City/State/Zip: Hoquiam, WA 98550

I totally oppose anything that could destroy Gray Harbor's greatest asset—its beauty and natural environment.

Response GP68-1

Comment acknowledged.

GP69, Bell, Sherri

Comment GP69-1

Say no to the OIL TRAINS: I'd say more, but I think you get the gist.

250 jobs is not worth the risk and side effects these terminals would impose on the Harbor and coastal Washington. We could lose thousands of existing jobs from one spill alone. And replacing one type of job with another is not creating jobs by any means. Just say no to these poorly thought out crude oil terminals, they're simply not worth it.

Please attend the meetings mentioned above, or if you can't please submit comments to the Department of Ecology through their website, thanks. Oh, and Renewable Energy Corp... just an FYI, but Crude Oil is NOT a Renewable Energy, at least not in the human time frame. So either change your hypocritical name, or drop your proposal and focus on what your facility in Grays Harbor was originally meant for, Biofuel production!!!

Response GP69-1

Comment acknowledged.

GP70, Bellamy, Patricia

Comment GP70-1

My name is Patricia Bellamy. Thank you for the opportunity to speak today. I'm here because the possibility of having an additional 100-mile long diesel coal train rumble through our beautiful northwest is horrifying to me.

I'm also speaking from the experience of over 40 years working as a critical nurse caring for heart and lung patients. But most importantly, I'm a great grandmother, and I'm most concerned about my great grandson's future, health, and safety.

These mile-long oil trains chugging diesel exhaust through our countryside communities will fill our air full of multiple toxins and carcinogenics, visual and microscopic soot. The unknown health risk associated with diesel transport makes expanding oil trains a moving public county health hazard, especially for children and elderly as well as those with respiratory and heart diseases.

Who would assume the cost of these stricken victims? Certainly not the oil companies or the railroads. How can people be assured by you decision-makers against the worst case oil train disaster like the one in Quebec, Canada where 47 citizens were killed?

The immediate health risk from vehicle transport and the potential for delays in the emergency response services, which is fire, police, and ambulance, cannot be mitigated, as well as continuous risk of derailment, fire and explosions.

Expanding diesel rail traffic is potentially widespread health crisis with the low-income families living along rail line suffering the most. Prevention is key in public health. You have the opportunity to make a real difference for many lives. Reject this flawed inadequate Draft EIS.

Thank you.

Response GP70-1

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion, including revisions to more fully describe human health impacts. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP71, Berger, David

Comment GP71-1

All energy projects should be evaluated on a comparative "cradle to grave" impact basis with respect to air, and water pollution, and climate change. Cumulative long and short term impacts must be regarded.

All oil trains should only be allowed to roll, if the cars can handle impact at the maximum velocity (eg. 70 mph) that they travel at.

We do not need to, in effect subsidize or bare the risk of large private corporations. Thanks for taking comment, Dave

Response GP71-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP72, Berman, Lowen

Comment GP72-1

To be very clear. To even consider the construction of new fossil fuel infrastructure at a time when 97%+ of the world's climate scientists warn of impending climate catastrophe is little short of madness. Any potential amount of jobs or development dollars pale in comparison to the financial, moral, human and environmental costs of continuing to extract, transport and burn fossil fuels. Instead of investing in new fossil fuel infrastructure we should be funding a Marshall Plan level effort to develop and implement sustainable energy systems while focusing on energy conservation through systemic lifestyle changes. These are not political opinions. They are hard scientific facts. They are reality. I am 73 years old and will not live to see the worst consequences of climate chaos. But my children and all of the world's children will curse our generations for failing to act when we had full knowledge of the consequences of our actions and inactions. In the name of humanity and the rest of the world's sentient being, we beg of you to say NO! to any new fossil fuel infrastructure.

Response GP72-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP73, Bernard, Judith

Comment GP73-1

No new petroleum trains or storage in WA! Spills WILL happen. We need to be working hard to find healthy alternatives to oil, not further endangering our land and water.

Response GP73-1

Comment acknowledged.

GP74, Beugli, David

Comment GP74-1

As the Project Coordinator for the Willapa Grays Harbor Oyster Growers Associate's I would like to thank your for the opportunity to submit comments for the Westway and Imperium EISs. Please review our attached comment letter. Sincerely, David Beugli

Response GP74-1

No attachment was uploaded to CommentWorks with this submission. However, Mr. Beugli's submission on behalf of Willapa Grays Harbor Oyster Growers Associate is presented with responses in Chapter 5, *Organizations,* of this Final EIS.

GP75, Bigelow, Bill

Comment GP75-1

Everything is connected. I have never even been to Grays Harbor, but expanding storage facilities for oil in Grays Harbor will affect all of us living near the Columbia River Gorge. Inevitably, rail traffic of unit trains carrying vast quantities of oil will increase throughout the Gorge. This would bring increased diesel pollution to our region; increase the threat of catastrophic accidents (have you investigated the impact of even a medium sized earthquake?); threaten Columbia River salmon; threaten Indigenous fishing rights; and violate the spirit of the Columbia River Gorge Scenic Area.

Response GP75-1

The Draft EIS considers the impacts related to a large earthquake, and smaller events are considered by inclusion in the consideration of the larger and more intense seismic event. Refer to the Master Response for Geographic Scope of the EIS for information about the analysis of indirect impacts in the extended study area in Chapter 5, *Extended Rail and Vessel Transport*. Refer the Master Response for Earthquake Probabilities regarding the analysis of impacts from seismic events.

Comment GP75-2

Perhaps most significantly for humanity, any increase in fossil fuel infrastructure increases the likelihood of a rise in global temperatures that put at risk the very communities throughout the world that contribute the least to greenhouse gas accumulations. The United States and most countries in the world are committed to an increase of no more than 2 degrees Celsius over pre-industrial times. Our carbon budget to stay under that temperature rise is 565 gigatons. The problem is that corporations and countries possess reserves of at least 2,795 gigatons of carbon -- more than five times our acknowledged budget. This means that there should be a moratorium on building fossil fuel infrastructure. I would like to know, point by point, whether these items are being taken into consideration as you deliberate over whether additional oil storage facilities should be allowed in Grays Harbor. Thank you for reading this comment.

Response GP75-2

Refer to the Master Response for Purpose and Focus of the EIS.

Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport from the likely source of crude oil to the furthest likely refinery destination, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals.

GP76, Black, Barbara Jean

Comment GP76-1

I attended the public hearing on October 8, 2015, in Aberdeen, Washington. I was moved by the passionate comments of so many citizens and public officials who, like me, are against any expansion of the use and transport of fossil fuels here in Washington or elsewhere. I believe we need to cut oil use and shift to clean fuels now. This will decrease air pollution and improve public health. Petroleum use is declining so it does not make fiscal sense to invest in these types of projects that are being proposed by Westway and Imperium. Furthermore, transporting oil puts communities at risk. The risk is not worth the few jobs these proposed expansions will create. We know from past experience that oil spills can have devastating effects on our natural resources. Please say "NO" to these projects and "YES" to a cleaner and greener future by investing in renewable energy like those projects in Grays Harbor, Oregon and Canada are already doing. Keep Washington clean and green and a place where people want to come and live and bring families to enjoy the beauty of the natural world. Let's spend money improving habitate for salmon and other species such as the many birds that stop here on their migration.

Response GP76-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP77, Blackbird, Marles

Comment GP77-1

we are very concerned about the health of our environment and children. please stop this assault on the earth and her peoples.

Response GP77-1

Comment acknowledged.

GP78, Bo, Bri

Comment GP78-1

These holding docs are highly dangerous for not only the environment, but the surrounding population as well. Methanol is poisonous to the central nervous system, and may cause blindness, coma, and death. I, along with countless others, oppose the Westway and Imperium Expansion Projects.

Response GP78-1

Final EIS Chapter 4, Section 4.7, *Impacts on Resources,* has been revised to more fully describe the human health impacts that could occur as the result of an oil spill, fire, or explosion. Issues specific to the REG (formerly Imperium Terminal Services) Expansion Project would be addressed in responses to comments as part of the Final EIS for that project.

GP79, Boatsman, Carolyn

Comment GP79-1

Put in an underground pipeline for gods sake. The Columbia Gorge should not be a rail conduit for oil no matter where it is going. That said, lets not despoil a public treasure to line the pockets of the oil industry. The whole idea is just infuriating.

Response GP79-1

Comment acknowledged.

GP80, Bock, Christian

Comment GP80-1

My name is Virginia Bock. I live in Hood River, Oregon, in the National Scenic Area of the Columbia River Gorge.

Oil trains pose a threat to our community. The greater the number, the greater the danger of derailment and explosion with catastrophic long-term sequences.

Your approval of these projects would increase the traffic of oil trains through the Columbia River Gorge, and consequently, the danger.

Please reject these proposals.

Response GP80-1

Comment acknowledged.

GP81, Bock, Christian

Comment GP81-1

My name is Christian Bock. I came up from Longview. Two days ago, I turned 80. And I just came here to help keep the environment because the generation born today, when they're my age, that they don't say, What did you guys do?

The thing is, ten years ago in Longview, there were some spin doctors who told us, We need energy. The United States needs energy. We need to put in an unloading facility for liquid natural gas.

And we all protested. We said, We don't need it. Upon which, a year later, two years later, this company out of Houston, Texas, went belly-up with over $100 million in debt.

Then another company started, right across from my house, to build a Ethanol plant because, We need energy. The plant was completed and they went into bankruptcy.

So we should not believe any one of these spin doctors who say, We need to do that. We need to do that. Just send them off.

Contrary to just recently, Donald Trump, he says, Yeah. Yeah. Yeah. Bankruptcy is part of business and I made a lot of money on it. We don't want that because it will ruin the landscape.

If an oil port is put in and it collapses ten years later, who is going to clean up? Nobody. For a century, it will be in a bad position.

The energy that's dug out of the ground should belong to all the people to be used here in moderation. Some people say it will last 100 years. I doubt that. But if it's used in moderation, maybe our grandchildren, when they turn 80, can still use it.

Response GP81-1

Comment acknowledged.

GP82, Bodding, Jim (Aleutian Isle Fisheries, LLC)

Comment GP82-1

Westway & Imperium Terminal

Services Expansion projects EISs

C/O ICF International

710 Second Street, STE 550

Seattle, WA 98104

Sirs:

As a Washington coastal Dungeness crab fisherman, I emphatically oppose the development within Grays Harbor of the proposed oil shipping of Bakken and tar sands oil via rail and tankers.

A devastative spill or spills are inevitable with [illegible] environmental devastation. I also own property within Grays Harbor and forsee [sic] an eventual property value problem as a result.

Jim Bodding

Response GP82-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values. Refer to the Master Response for Purpose and

Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP83, Boland, Brice (Surfider Foundation)

Comment GP83-1

My name is Brice Boland with the Surfrider Foundation. I'm here to voice a concern for over 3,000 boarders in Washington state who are opposed and are concerned about the proposed oil terminal.

Our members come from all over the state to recreate in Grays Harbor. Our members walk the beach, watch the sunsets in Ocean Shores, and enjoy the State Park in Westport. They bring their wallets, they bring their boards, they bring their enthusiasm to support this great area of recreation within the state of Washington.

Surfrider recently completed a Recreation Use Study and will be used as part of the state's marine spatial planning process. It has determined that $481 million comes to the coastal communities of Washington in nonconsumptive recreational uses. A major portion of that is in Grays Harbor.

The DEIS needs to address the financial impact to the current existing economy whether it is recreation, commercial fishings, the shellfish industry, and all the various current economies that are providing jobs, employment, and a way of life here in Grays Harbor. We oppose the terminals and ask for no action on the proposed permits.

Thank you.

Response GP83-1

Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7.

GP84, Bold, Molly

Comment GP84-1

My name is Molly Bold. I'm a lifelong resident of Grays Harbor. My family has been here for a 130 years, and my son, Fritz, will be a fifth generation fisherman here in Grays Harbor County and of the coast of Washington.

And, as a young woman that grew up in the heart of the timber bust, one of my greatest concerns and something that is very dear to my heart is the economy of Grays Harbor and having jobs and family wage jobs that will benefit our community, that will rebuild our resources and our infrastructure, and our surrounding areas, and lift the depression that is over this community, both economically and socially.

But, as I look at the oil proposals and the shift in our resources being directed toward a fossil-fuel based economy, I'm concerned because it's not sustainable.

And, as I look to the future and generations of fishermen and families and the thousands of people that are supported by our seafood economy, transferring our resources and investing so much and risking so much toward these oil expansions is not worth it. It's not a great investment or a great choice.

When I think of Grays Harbor 35 years from now, I don't want to think of a dirty community or an oil saturated community. Or even as we've seen with these huge industrial projects in our port, I don't want to see empty facilities as this phase -- or as these types of facilities phase out and are no longer needed. I want us to invest in things that are sustainable and will benefit our communities and our families. Big oil is not the proper investment for us.

Response GP84-1

Comment acknowledged.

GP85, **Boonstra, John**

Comment GP85-1

Good afternoon. My name is John Boonstra. I'm former executive minister of the Washington State Association of Churches. I'm currently serving in the United Church of Christ.

I speak on behalf of faith-based people who remind you that today's hearings are not only about the future of Grays Harbor. These proposed oil terminal retrofits will escalate dangerous rail transport of volatile crude where I also live in the Columbia Gorge.

Your EIS is limited in scope. It excludes any truthful analysis of the impact of extended communities, like the one in which I live. It treats people in extended regions as if we are collateral damage to the deadly risks of the big oil agenda.

Everybody knows you can't mitigate significant environmental destruction from oil train accidents, and oil tank spills, and air pollution.

Everybody knows that all the insurance policies in the world written to cover the cost of low profile oil spills will never be enough to compensate for the impossible liability that big oil places on the lives of our children.

Everybody knows that oil is a fossil fuel that wrecks the planet and in 15 years it will become an expendable asset. When Pope Francis came to the United States, he reminded us that harm done to the environment is harm done to all humanity; that high polluting oil must be and can be replaced with renewable energy; that we are one single family and that this is the moment to make decisions for our own dignity.

I urge you to reject the expansion proposal by Westway and Imperium, and I believe that everybody knows it's the sensible, conscionable, and responsible thing to do.

Thank you.

Response GP85-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

GP86, **Borso, Pam**

Comment GP86-1

Dear Consultants, Ecology and City of Hoquiam. The people of the State of Washington have the right to decide which risks they are willing to accept and which they are not, and just because some dangerous projects were permitted, that doesn't mean we should approve of more of them. We urge you to reject the oil terminals proposed in Grays Harbor because they will create the following significant and adverse impacts which cannot be avoided or mitigated and are unacceptable. The tank cars cannot be made crash worthy. Non-yard oil train derailment spills are guaranteed to happen in the extended area several times per decade. An oil spill would have significant and adverse impacts that cannot be prevented or mitigated. At best only 14% of the oil is recovered in a spill. Crude oil contains benzene which cannot be recovered from the water. Thank you for allowing this comment Pam Borso

Response GP86-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP87, **Bossard, Pat**

Comment GP87-1

My name is Pat Bossard. I object to the transportation of crude oil through Grays Harbor. Who pays for the overpasses and underpasses of the railroads so that emergency crews and citizens can travel about their daily lives without being blocked by the trains?

Response GP87-1

As noted in Master Response for Connected or Similar Actions, no modifications to the railroad are needed because of the proposed action. The analysis of impacts related to railroad improvements is outside the scope of this Draft EIS.

Comment GP87-2

Who will pay for cleanup of crude oil? Is that in writing? Has a complete study been done on the Wynoochee River Railroad Bridge that is over 100 years old. Who will repair and replace that bridge if necessary? Is that in writing?

You sit on the streets and when loaded log trucks come through Aberdeen and hits a bump, you can feel the ground shake. Same with Hoquiam. The ground is unstable. It rains a lot in Grays Harbor County. Railroad ties decay and collapse. We had many grain rollover cars last year. Three of them were near streams.

Response GP87-2

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP87-3

Should crude oil get the okay to ship through Grays Harbor County and there is a spill into one of our streams or rivers, it would carry to the ocean. And because the law of averages and the history of spills we've already had with grain, this will happen.

The fish, crab, and razor clam industry will be affected for a very long time which will trickle down to many losses. The impact will be huge. If an explosion and fire should happen due to crude oil, many lives will be lost and there will be horrible regrets forever.

Response GP87-3

Comment acknowledged.

Comment GP87-4

Please use common sense in your decision-making and not let dollar signs taint and cloud your thinking. Please listen to the testimonies and knowledge of the citizens of all walks of life and ages of Grays Harbor County, Oregon state, and beyond worldwide. Please listen and learn by others' mistakes. I had to cut this letter way down.

Thank you so much for listening. I moved here in 1948. I'm almost 70 years old. I've seen a lot of mistakes made. A lot of people thought they could make huge, huge money off of some of these things, and it's not as great as you think it's going to be.

Thank you.

Response GP87-4

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP88, **Bossard, Pat**

Comment GP88-1

I object to the transportation of crude oil and coal by railway or any other means through Grays Harbor and Washington State.

I object to the storing of crude oil and coal in Grays Harbor and Washington State.

Response GP88-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP88-2

Who will pay for overpasses and underpasses of the rails so that citizens, bus drivers, business owners, emergency crews, et cetera, can travel about in their daily lives without being blocked for 30-plus minutes by increased train activity due to crude oil or coal shipments? Is it in writing?

Response GP88-2

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, addresses potential impacts on vehicle delay and emergency vehicle access. Refer to the Master Response for Mitigation Framework for more information about the development, implementation, and enforcement of mitigation measures.

Comment GP88-3

Who will pay for cleanup of crude oil or coal spills? Is it in writing?

Response GP88-3

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP88-4

How will companies such as lumber, automobile, grain, Lemay Enterprises, Inc., et cetera ship by rail in and out of Grays Harbor County if crude oil and coal transporting takes up the majority of the rail time?

Response GP88-4

Draft EIS Chapter 3, Section 3.15.4.7, *Current PS&P Rail Line Capacity and Operations*, presents the results of the rail modeling analysis of the PS&P rail line capacity. Based on this analysis, the addition of 1.25 trains per day on average to baseline trips would result in approximately 4.25 train trips per day along the rail line, which is approximately one-third of the capacity of the line.

Comment GP88-5

Has a complete study been done on the Wynooche River Railroad Bridge that is over 100 years old? Who will repair the Wynooche River Railroad Bridge or rebuild it when necessary? Is it in writing?

Response GP88-5

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP88-6

Please read the History of Aberdeen and Hoquiam, Washington.

The cities were built on fill. If you stand by a street when a loaded log truck hits a bump, you can feel the ground shake. If you are in a building, it can be felt also. The ground is unstable.

It rains a lot in Grays Harbor County. Railroad ties decay and collapse. Many are currently worn out and have not been adequately repaired, maintained or replaced. Recent train car rollovers and spills prove this.

Should crude oil and coal get the okay to ship through Grays Harbor County? If there is a spill into one of our streams or rivers which will carry it to the ocean -- and because of the law of averages and history of spills we've already had, this will happen -- the fish, crab, oyster, and razor clam industry will be over with for a very long time. This will trickle down to many losses, tourism, home sales, and real estate values will plummet. The impact will be huge.

The same would happen to the logging and farming industry and other businesses if a dry land spill happens. The impact will be huge.

If an explosion and fire should happen due to a crude oil accident, many lives will be lost and there will be many horrible regrets forever.

Please, I beg you to use common sense in your decision making and not let dollar signs taint your thinking.

Please listen to testimonies and knowledge of the citizens of all walks of life and ages of Grays Harbor County, Washington State, and beyond worldwide.

Please listen and learn by other's mistakes.

Our Port of Grays Harbor County has had many opportunities in the past to have clean and safe businesses to start up and ship out of our port but were pushed out because of expensive leases, permits, and costs, so they went elsewhere.

Are the potential hazards of bringing crude oil and coal through Grays Harbor County to be stored at and shipped out of our port really worth the 85 jobs it will generate?

Force the oil companies to build refineries near drill sites instead of shipping crude oil and coal across multiple states and oceans.

Thank you for reading my comments. I moved to Grays Harbor County as a baby in December 1948.

Pat Bossard, 32 Matzen Road, Montesano, Washington 98563.

Response GP88-6

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP89, Bougher, Thomas

Comment GP89-1

Name: Thomas R. Bougher, concerned Citizen
Organization: Citizens for a Clean Harbor
City/ State/ Zip: Hoquiam, WA 98550

My concern is for public safety. Not seeing input from local first responders included in the DEIS, my question is whether our communities have capacity to respond to a petroleum fire like that which occurred in LacMegantic, Quebec? We had "crash" trucks that projected FOAM fire suppression agents to deal with such events affecting aircraft operations in Danag. What resources do Hoquiam and Aberdeen fire departments have on hand to fight petroleum fires? What do our firechiefs [sic] say about our readiness to undertake exposure to large volumes of flammable petroleum? If specialized firefighting equipment is called for, who will pay for it? Residential taxpayers, or those private enterprises creating the threat? Having survived fires, and explosions during the Vietnam War, I feel very threatened by the proximity of these proposed projects nearby my home in Hoquiam. The apparent willful disregard of public safety by responsible public officials is reminiscent of the attitude of the politicians who compelled my generation to serve in the military, as well as the same mindset which sent subsequent generations to the Middle East

Response GP89-1

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

GP90, Bougher, Thomas

Comment GP90-1

My concern is for PUBLIC SAFETY. My background includes service as a United States Marine Corps safety office, employment as a USDOL/OSHA compliance safety and health officer, and Membership in the American Society of Safety Engineers. Transportation, and storage, of volatile toxic and flammable materials in bulk, like those proposed for the Port of Grays Harbor, which includes the City of Hoquiam, poses a serious and imminent hazard to those of us residing in proximity to these operations, which cannot be administratively mitigated. Approval of these proposed commercial operations, by cognizant public officials, would assume a voluntary assumption of risk by the electorate which simply does not exist, i.e. they have no legal mandate to proceed in accommodating existential corporate interests, and doing so will constitute willful disregard for public health and safety, which they have been entrusted to protect. Having personally experienced the devastating effects of a worst case scenario, while serving in a combat environment during the Vietnam war, I can testify that the tragic events experienced by the citizens of Lac Megantic, Quebec, will have the same destructive impact upon our communities here in Grays Harbor, Washington. The fact that large numbers of my fellow citizens here in Hoquiam have not felt these affects personally, and are behaving in an apathetic manner toward these presently abstract proposals, in no way negates the legal, and moral duty, of our public officials to act with an abundance of caution, in the public interest. Therefore, I strongly recommend that these proposals, currently under review, or contemplated, as in the care of Terminal 3 in Hoquiam, be DISAPPROVED.

Response GP90-1

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP91, Bougher, Tom

Comment GP91-1

My name is Tom Bougher. I am a homeowner in Hoquiam. And I wasn't sure whether I wanted to speak this evening. This is fairly emotional for me. I'm unfortunately a person that suffers from PTSD having served in the Marine Corps in Vietnam. And one of the events that led to that condition is

very similar ironically to the event that occurred in a small town like Hoquiam, Lac-Megantic, Quebec is where one of these Bakken crude train exploded and burned and killed 47 people.

So this is a very real feeling to me. I feel personally threatened by the thought that this project would go through and I would have to live in proximity to these explosive materials. I bought my home because I thought Hoquiam was a safe place to live in retirement. And I opted for a simpler lifestyle and to be debt free rather than continuing in a manufacturing business in California that we owned.

My question is what our fire chief has to say about our preparedness for meeting this threat. In Da Nang we had crash trucks to cover air traffic like they have at the Seattle International Airport to deal with fighting fires involving flammable materials like petroleum.

We recently acquired a ladder truck in Hoquiam for over $1 million. Would we also have to acquire a foam truck in order to meet the threat of a fire involving petroleum?

Thank you.

Response GP91-1

The City of Aberdeen Fire Department provided detailed comments on the Draft EIS, which are presented with responses in Chapter 3, Section 3.1, *Regional and Local Agencies,* of this Final EIS. Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

GP92, **Bougher, Tom**

Comment GP92-1

My name is Tom Bougher spelled B-O-U-G-H-E-R.

I'm a homeowner in Hoquiam, and I've read and studied a number of what I consider to be valid considerations questioning the safety and cost benefits I think of the proposed projects. What concerns me most is public safety.

I served with the Marine Corps in Vietnam, and one morning I was awakened at three a.m. by an explosion involving a field depot. So I have some personal experience of what it feels like to be in an environment like the Lac-Mégantic, Quebec rail disaster. That's what it is. You can find it in social media.

And I'm concerned that we don't have any input in the DEIS from our fire chief in Hoquiam or the other communities affected, and whether or not we're able to fight a fire.

We had crash trucks that could project foam on the fuel fires that occurred because we dealt with aircraft operations. Airports have crash trucks that are specialized equipment. They're very costly.

Hoquiam taxpayers, like myself, were recently asked to acquire a ladder truck for our fire department because we have a multi-story occupancy, the Emerson Hotel, and that was over a million dollars. I think it was almost a million and a half dollars.

How much would it cost to be able to address the risk of a petroleum fire, and who would pay for that, and that's my concern.

I'm trying to adopt a positive attitude and I'm a Marine. I was trained to can do, but I don't really like the idea. I feel threatened by the existence of these explosive trains near where I live. I feel like I'm back in Vietnam, which may or may not be a realistic response to what's taking place.

Those are my concerns.

Response GP92-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP93, **Brake, William**

Comment GP93-1

Thank You for extending the comment period for the Westway and Imperium DEIS from 60 days to 90 days. It appears that Westway and Imperium Agreed to this change and are interested in being a "Good Neighbor in the Community"

Response GP93-1

Comment acknowledged.

GP94, **Brake, William**

Comment GP94-1

November 15, 2015

Washington Department of Ecology
Sally Toteff
Southwest Regional Director

City of Hoquiam Washington
Brian J Shay
City Administrator

Westway Terminal Expansion Project

Public Comments on Draft Environmental Impact Statement

Comment Period August 31, 2015 to November 30, 2015

Dear Decision Makers,

Thank You for the opportunity to submit public comments.

I am submitting 53 comments on the proposed Westway Terminal Expansion at the Port of Grays Harbor Washington to deliver by rail 49,041 Barrels Per Day Crude Oil and Store at the Facility and deliver to Marine Vessels for delivery to west coast and international locations.

I am a retired Professional Engineer and have a 35 year career in the energy business with specialization in environmental, process and safety engineering as well as a management position in charge of a workforce of 115 employees. My degree in Chemical Engineering with specialization in cryogenic natural gas and helium operations offers the operational experiences lacking in this report.

The following is the top twelve reasons to deny permits for the Imperium Crude Oil Terminal Facility at Grays Harbor and the 53 items of concern on the project.

William Brake PE
3407 NW 116th Way
Vancouver, WA 98685
H – 360-574-9735
Williamb98685@aol.com

Port of Grays Harbor Washington –

Crude Oil by Rail Receiving, Storage, and Marine Vessel Loading to unknown destinations

COMMENTS - There were 22,200 comments received during the Scoping Comment Period for the preparation of the Draft Environmental Impact Statement for the Westway and Imperium Projects. The entire Grays Harbor County has a population of 72,797 people in 2010 so there is a considerable concern by citizens beyond the local area in areas considered “up track”.

RAIL - There are 52 rail bridges and culverts and 37 named and unnamed tributaries of the Chehalis River that are crossed by the PS&P Railroad and the 2,600 square mile watershed has no flood control facilities and is a wild river.

RAIL - There are 103 grade crossings of the PS&P Railroad and it impacts the wait time for both personal vehicles as well as emergency vehicles along the 59 mile rail system from Centralia to Hoquiam.

Response GP94-1

Comment acknowledged.

Comment GP94-2

RAIL - The rail systems are an aging 125 year old system that even in the perfect world are not maintained or managed for the rapid growth of unit trains of fossil fuels like crude oil, coal and propane. The long and repetitive weight has a large bearing on the recent surge of incidents especially at bridges, rivers, and

curves. If there are problems now, there will be incrementally more problems in the future as the maintenance cannot keep up with the growth.

Response GP94-2

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP94-3

TERMINAL - The Imperium Bio Diesel Facility has had a rapid decline in production the past three years with 50 %, 20 %, and 10 % of rated capacity. The facility was recently sold to Renewable Energy Group.

TERMINAL - There is no need for additional crude oil terminals in the Pacific Northwest as all the crude oil product is currently going to destinations now without the construction of new terminals. This only a business opportunity for a "Middleman Operation" to obtain a fee per barrel delivered.

EARTH - Between a 30 % and 50 % Probability of a Magnitude 6.0 or greater earthquake in the area in the next 50 years indicates this is not the ideal site for crude oil facilities.

EARTH - The Westway and Imperium Terminal Facilities are built on extremely poor soil of dredged and fill material requiring significant engineered steel pipe pilings being built between 75 and 130 feet below grade.

Response GP94-3

Comment acknowledged.

Comment GP94-4

AIR - There are 22 sensitive receptors within 1 mile of the facility like parks, child care facilities, health care facilities, schools, and recreational facilities and farmers markets. This is unacceptable proximity to a Crude Oil Terminal.

Response GP94-4

Final EIS Chapter 4 has been revised to include an additional applicant mitigation measure to improve local emergency planning and response that includes development of a geographic information system (GIS) layer that identifies critical facilities near the facility and along the PS&P line. The facilities will include schools, hospitals, community centers, and parks within 0.5 mile of the rail line. The GIS layer will be provided to the Local Emergency Planning Commission, local fire departments, and Ecology. The study will be submitted prior to beginning operations. Nonetheless,

mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP94-5

SAFETY – There is No HAZMAT Team in the immediate vicinity of the project area from Centralia to Hoquiam and a serious spill, explosion, or fire requires a 2-3 hour wait for specialized teams to arrive from Tacoma or Olympia.

Response GP94-5

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP94-6

VESSEL - The Port of Grays Harbor is a shallow water port influenced by 9 foot tidal changes twice a day. A deep draft marine vessel can easily run aground due to shallow water depth.

Response GP94-6

Draft EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels*, provides information about navigable windows based on tidal heights.

Comment GP94-7

BUSINESS – The Tax Revenue of the two projects is $2,858,000 annually and is $0.0616 per barrel for a product valued between $40 and $100 per barrel. A single rail car represents $41 Tax Revenue.

Response GP94-7

Comment acknowledged.

Comment GP94-8

CONCERNS BY William Brake

WESTWAY TERMINAL AT THE PORT OF GRAYS HARBOR

Format is as follows: Section, Page Number, Risk (H,M,L) and Comment

General – Information Only – Comparison of the Railcar Unloading spots and the expected number of railcars to be Unloaded Daily is as follows for several of the proposed Crude Oil By Rail Terminals

LOCATION	NEW RAIL UNLOADING SPOTS	BARRELS PER DAY	RAILCARS PER DAY	RAIL CARS/ SPOT
Westway	62	48,917	70	1.12
Imperium	41	78,166	112	2.73
Tesoro Savage	90	360,000	514	5.71
NuStar Energy	12	22,200	32	2.66

Westway is significantly under estimating the Crude Oil Product or is significantly overbuilding the number of railcar unloading spots for future expansion.

Response GP94-8

As stated on page 1-1 of the Draft EIS, the applicant would be permitted to handle up to 17.9 million barrels per year. Chapter 3, Section 3.15, *Rail Traffic*, states that each unit train would have an estimated 120 cars. Each rail car would hold approximately 714 barrels for a total of approximately 85,000 barrels per loaded unit train. The anticipated rail traffic of 1.25 trains per day (including both loaded and empty trains) is consistent with the estimated 49,000 barrels per day on average. Additional capacity is needed to accommodate above-average days.

As noted in the Master Response for Project Objectives and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant. Draft EIS Chapter 2, *Proposed Action and Alternatives*, describes the type of material and approximate volumes to be transported based on this information. The City of Hoquiam will specify maximum throughput in the conditions of a shoreline development permit. In addition, other permit approvals could identify the maximum allowable (permitted) throughput of the facility. Any increase in annual throughput capacity would require revised or new permits and plans.

Comment GP94-9

General Page 13 – LOW - 22,200 comments were received during the scoping process and this is a significant involvement by the public. The public is actively involved in the Westway Terminal Project and is appreciated that the project has moved forward to the Draft Environmental Impact Statement.

Response GP94-9

Comment acknowledged.

Comment GP94-10

General Page 14 – HIGH - The project area is from Centralia Washington where the PS&P Railroad takes custody of the Crude Oil and continues along the Chehalis River for 59 miles to the Westway Terminal Facility in Hoquiam Washington and to a marine loading berth in the Port of Grays Harbor. This area is very limited in scope as there are several million people within the Danger Blast Zone along the route from the Production Fields in the Intermountain Western United States and Canadian Provinces. Additionally the US Water Boundary is usually designated as 12 miles off shore and this area should be considered also. There are habitat and people that is impacted throughout the approximate 1,285 miles from Williston ND to Hoquiam WA which is considerably more than 59 miles.

Response GP94-10

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP94-11

General Page 16 – HIGH- Considerable Earthquake, Seismic, and Tsunami potential exists in the Cascadia Subduction Zone and this is not a preferred location for a Crude Oil Transfer Terminal operation.

Response GP94-11

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP94-12

General Page 21 – HIGH - Rail Noise from both the Horn and the Wayside Noise from the Engines and wheels is a significant impact to human health along the 1,273 mile route. This needs to be studied more.

Response GP94-12

Draft EIS Chapter 3, Section 3.7, *Noise and Vibration,* provides an analysis of noise and vibration impacts related to the proposed action that would occur in the study area. Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP94-13

General Page 25 – HIGH - The Quinault Nation has unavoidable and non-mitigatable fishing damage from the proposed Westway Terminal in the Grays Harbor Area. This loss of fishing revenue needs to be compensated.

Response GP94-13

Comment acknowledged.

Comment GP94-14

General Page 28 – HIGH - The Olympic Gateway Plaza retail area has unavoidable and non-mitigatable retail damage from the proposed Westway Terminal in the Grays Harbor Area. This loss of retail revenue needs to be compensated.

Response GP94-14

Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7. For more information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework.

Comment GP94-15

General Page 34 - HIGH - A 10,000 Gallon or an 8.4 Million Gallon fire that reaches the water are both classified as the same high potential environmental impact.

Response GP94-15

Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant, regardless of spill size.

Comment GP94-16

General Page 34 – HIGH - A three, five or thirty rail car fire are all classified as the same high potential environmental impact.

Response GP94-16

The scenarios referenced in the comment all have a high potential to result in environmental impacts. As noted in Draft EIS Chapter 4, Section 4.7, *Impacts on Resources,* while the potential for impacts would depend on the specific circumstances of each incident, larger spills are more likely to result in significant environmental impacts because of the relatively greater potential for widespread damage.

Comment GP94-17

General Page 36 – HIGH - Table S-3 indicates that animals die but people only have respiratory problems, dizziness, nausea, and eye and throat irritation. These are very hazardous and toxic materials and people die.

Response GP94-17

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe human health impacts that could occur as the result of an oil spill, fire, or explosion.

Comment GP94-18

General Page 110 – HIGH - The change from 18 to 80 rail car unloading spots only has concrete containment for a spill equal to one rail car plus an allowance for precipitation. This change in the number of rail spots is significant and the project needs several more containment basins.

Response GP94-18

Draft EIS Chapter 2, *Proposed Action and Alternatives,* Figure 2-4, *Existing Rail Loading and Unloading Spots over Concrete Containment Area,* shows that, for the proposed action, railcars would be unloaded one by one in the containment area. The project site would only accommodate 20 cars of a unit train (120 cars) for each rail spur, so the train would need to be delivered in six separate switching operations. The leading 20 cars would be pushed into a track and the remaining 20 would be pushed into the adjacent track.

Failure of an unloading hose would typically be constrained to a single tank car being unloaded. Moreover, such spills would not be expected to involve the loss of a full rail car as unloading would be stopped—and the car may already have been partially unloaded. The proposed action would comply with regulations regarding spill containment.

Comment GP94-19

General Page 111 – HIGH - The location of the Dock Safety Unit is indicated to be on the dock if space is available and on the shore if space is not available. This defeats the purpose of the safety unit and the project design should be farther along at this stage and not be a point to be determined later in the project.

Response GP94-19

If adequate space is not available on the dock, the unit would be installed on the shoreline near the dock in accordance with U.S. Coast Guard siting requirements.

Comment GP94-20

General Page 112 – HIGH- There is NO need for the Westway Terminal at the Port of Grays Harbor Washington as it is NOT a terminal directly connected to a refinery. It is strictly a "Middle Man Operation" that charges a Fee to receive crude oil by rail and store and transfer to marine vessels for delivery to unknown final destinations.

Response GP94-20

Comment acknowledged.

Comment GP94-21

General Page 112 –HIGH - The Rail Facilities will not be able to handle an entire unit train at 120 rail cars and require the segmented batching of the rail cars though a switchyard increases the potential for an unsafe act or unsafe condition resulting in either a spill or fire of the crude oil. Repetitive operations are one of the most dangerous tasks.

Response GP94-21

Comment acknowledged.

Comment GP94-22

Earth Page 127 – HIGH - Three historic major earthquakes indicate that this is not a preferred site for a crude oil transfer terminal. The use of 18 inch steel pipe driven 150 feet deep and over 200 columns per tank is a good indication the soil is very susceptible to liquefaction and unsuitable for a terminal facility. The three earthquakes were the 7.1 magnitude Olympia Earthquake in 1949, the 6.5 magnitude Seattle Tacoma Earthquake in 1965 and the 6.8 magnitude Nisqually Earthquake in 2001.

Response GP94-22

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP94-23

Earth Page 129 –HIGH - A 30-40% probability of a 6.0 Magnitude Earthquake in the next 50 years at the terminal site and a 40-50% probability of a 6.0 Magnitude Earthquake in the next 50 years along the PS&P Railroad is not a Mitagable event and the project should be cancelled. There will be a large spill, fire, explosion and loss of life related to this earthquake potential.

Response GP94-23

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP94-24

Air Page 145 – HIGH - The impact area for air emissions is from the Centralia Rail Yard, through the terminal operations and to 3 miles off shore. The emissions are not for all the locomotive emissions from the delivery to the railroad in Montana, North Dakota or Alberta Canada or does it include the standard 12 miles from the shore line to the boundary of US and International Waters. These items should be included in the analysis to be a valid impact area for the project. This does not include upstream crude oil production operations, Crude Oil Delivery Railroad Terminal Operations or any distance in International waters to the final refinery feedstock. As a Middleman Operation, this Terminal is not required as all the Bakken Crude Oil Product is currently going to market and this is only a business financial opportunity for Westway.

Response GP94-24

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively. The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Comment GP94-25

Air Page 161 –HIGH - The concern on Greenhouse Gas Emissions seems to be focused on Locomotive Diesel and Marine Distillate Fuel Oil Emissions and not on the actual product. The emissions could be reduced considerably by changing to either Propane or LNG as the fuel source for the large industrial engines. The overall emissions would be close to half of the similar Locomotive Diesel and Marine Distillate Fuel Oil Emissions and needs to be evaluated as an alternate fuel supply. It is important to note that this is an isolated project study area and could be an example for other Railroad and Marine Vessel Projects in the State of Washington.

Response GP94-25

As noted in the Master Response for Project Objective and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant.

Comment GP94-26

Air Page 163 – HIGH - The required emission efficiency of the Marine Vapor Combustion Units (MVCU) is listed at 98 %. The NuStar Energy Terminal Application in Vancouver Air Discharge Permit (ADP-07-2710-R3 Dated April 21, 2014) requires 99 % reduction efficiency for the MVCU. The 1 % difference is significant for the Crude Oil Product as it has a lot of undesirable compounds that need destruction. 99 % is a routine achievable standard.

Response GP94-26

The Olympic Region Clean Air Agency determined that the best available control technology for the marine vapor combustion units is 98% in their Notice of Construction Application response to the applicant dated December 5, 2014. The proposed vendor for the marine vapor combustion system guarantees a minimum 99% reduction in total hydrocarbon vapor emissions when operated in accordance with vendor specifications.

Comment GP94-27

Water Page 182 – HIGH - The 100 year flood zone elevation used in this report is meaningless based on two recent events. In December 3, 2007 the Interstate – I-5 was closed for 20 miles due to flooding and January 7, 2009 the same area was closed due to flooding of the Chehalis River. We are not exempt from flooding for the next 94 years so more extensive engineering review is required. The Watershed is about 2,600 square miles and has no flood control dams and is considered a wild river. By comparison the state of Rhode Island is 1,212 square miles so the watershed is over twice the size of this state.

Response GP94-27

The floodplain information provided in the Draft EIS is based on the Federal Emergency Management Agency's (FEMA) floodplain mapping. FEMA's Federal Insurance Rate Maps are the official maps on which FEMA delineates the special flood hazard areas for regulatory purposes under the National Flood Insurance Program. Special flood hazard areas are also known as the 100-year floodplain, which are areas that have a 1% annual chance of flooding. The 100-year floodplain is the area where the floodplain management regulations of the National Flood Insurance Program must be enforced. The 2013 preliminary FEMA maps that are described in Chapter 3, Section 3.5,

Water, are the appropriate standard for reference for the proposed action. RISK Map studies that were used to delineate the 1% floodplain area are based on the best available and up-to-date information recently gathered from Light Detection and Ranging (LIDAR) and other technology that was not previously available when older FEMA floodplain maps were developed.

Comment GP94-28

Animals Page 241 – MEDIUM - The voluntary two week Crude Oil Shutdown period for the annual migratory shore bird festival in Hoquiam is not a realistic event. The City of Hoquiam will lose $765,348 per year revenue from the terminal and $15.3 million dollars over the 20 year project life related to this festival. Industry and Birds do not mix and this is a meaningless requirement.

Energy and Natural Resources Page 243 – HIGH - The 138,583 gallons annually of Diesel for Rail Operations is only a fraction of the overall rail operations that is 22 times this amount. Similarly the Marine Vessel Fuel is 93,961 gallons annually is only a fraction of the entire Marine Fuel requirement that is 166 times more.

Response GP94-28

Comment acknowledged.

Comment GP94-29

Energy Natural Resources Page 248 – MEDIUM -The diesel fuel requirement of 138,583 gallons per year for the 458 PS&P Railroad trips could be replaced with either 196,865 gallons of propane or 213,825 gallons of LNG. Both are a better alternative to diesel with lower emissions and have an added benefit of increased engine life and reduced maintenance requirements.

Response GP94-29

Refer to the Master Response for Purpose and Focus of the EIS.

Comment GP94-30

Historic and Cultural Preservation Page 320 – HIGH - The first portions of the Northern Pacific Railroad were completed in 1892 and the rail line is 123 years old and is currently owned by Genesee and Wyoming and operated as Puget Sound and Pacific Railroad. The railroad as a small independent short line operation does not have the capital funding or technical expertise to maintain the rail line to the requirements of a Class I Railroad and frequent derailments and damaged equipment appears to be routine. If it was in better shape, it would be an attractive asset for purchase by BNSF or others, but this is not the case. The introduction of Crude Oil as a rail commodity brings significant added danger and risk over other currently handled commodities. Crude Oil is an upstream product of Oil Production and is not predictable in physical or chemical composition and 'wildness' is a common characteristic.

Response GP94-30

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under

existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant. Refer also to the Master Response for the Purpose and Focus of the EIS.

Comment GP94-31

Historic and Cultural Preservation Page 323 – HIGH - The soil below the Westway Terminal Site is Dredged Fill between 75 and 130 feet below the surface. This soil material lacks cohesiveness and structural strength required for large industrial foundations. The Storage Tank design calls for about 150 pieces of 18 inch steel pipe and use of a pile driver to force the pipe to a depth of refusal at 150 feet below grade. This soil is not strong enough to hold the weight of a single steel tank and its crude oil contents and will result in a catastrophic failure at piping connections. The dredge and fill operations have been ongoing since the early part of the 20th century.

Response GP94-31

Final EIS Chapter 3, Section 3.1, *Earth*, clarifies that according to the investigations completed at the project site, the majority of the site consists of gravel to about 40 feet below the surface underlain by loose to dense sandy gravel to a depth of about 130 feet below the surface. Figure 8 of the Hart Crowser report (2013; as cited in Section 3.1, *Earth*) indicates competent soil is generally reached at 150 feet below-ground surface.

Comment GP94-32

Tribal Resources Page 347 – HIGH - The vessel trips per year currently are 436 and the proposal for the Westway Terminal is an additional 238 trips per year making the new total 674 trips per year. This is a 35 % increase over existing vessel traffic and the Westway Project will significantly impact the fishing rights and fishing harvests of the Quinault Indian Nation that has treaty protected rights. Additionally the Chehalis Tribe will be impacted by the Westway project although they do not have treaty protected rights. These rights cannot be mitigated by the proposed measures and the Quinault Nation should be adequately compensated for the loss of fishing revenue by Westway. This compensation for the 737,800 average pounds of commercially caught Quinault Fish Harvest and the 2,581,019 average pounds of Dungeness Crab Quinault Crab Harvest cannot be overlooked.

Response GP94-32

The Draft EIS does not make a determination of significance related to tribal resources or treaty rights.

Comment GP94-33

Hazardous Materials Page 360 – HIGH - The Imperium Terminal at the Port of Grays Harbor was inspected by the Washington Department of Ecology and in 2011 found 7 violations and in 2014 found 6 violations that have reportedly all been corrected. The violations were on CERCLIS,

Manifest, RCRA, EPA and Echo and this is a concern on the potential Imperium Crude Oil Expansion Project. Also Westway was not reviewed and they are a similar operation.

Response GP94-33

The specific violations mentioned in the comment have all been corrected. They were mentioned in Draft EIS Section 3.14, *Hazardous Materials*, as having a low potential to affect the proposed action because of their location within the project footprint. The environmental history of the project site was reviewed (via prior environmental site assessments) and no recognized environmental conditions were noted during the review.

Comment GP94-34

Hazardous Material Page 364 – HIGH – The Groundwater at the Westway Project Site is 10 feet below grade and makes this an extremely dangerous site for a Crude Oil Terminal. The American Institute of Chemical Engineers Facility Siting Guidelines would prohibit the construction of a petroleum facility on this site.

Response GP94-34

Response:

The proposed facilities would be designed and constructed in accordance with all applicable regulations.

Comment GP94-35

Rail Traffic Page 376 –HIGH – The PS&P is classified as a Class III Rail System with annual revenue of $34.7 Million Dollars and has 52 rail bridges and culverts along the 59 mile route from Centralia to Hoquiam Washington. Part of the narrative discusses Class 2 and the difference is confusing on what is allowed and disallowed on this short line rail system. One example is that the maximum speed limit is 25 mph and some locations like the two rail drawbridges the maximum speed is 5 mph.

Response GP94-35

As stated in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, the PS&P rail line is considered a Class 3 short-line railroad by the Surface Transportation Board based on its annual revenue. The Federal Railroad Administration (FRA) classification of railroads is based on the number of mainline tracks and operating speed. PS&P tracks are registered with FRA as Class 2 tracks with an overall maximum speed of 25 miles per hour for freight trains, although there are exceptions to the maximum speed in certain areas as noted in Section 3.15.4.2, *PS&P Rail Line Track Conditions and Physical Characteristics*.

Comment GP94-36

Rail Traffic Page 394 – High – The wait time at grade crossings near Aberdeen and Hoquiam is currently at 1 hour and 10 minutes and this will grow to 1 hour and 52 minutes with the addition of the Westway Terminal. The wait time is NOT a problem for the rail line but is a significant danger to vehicle traffic. If I lived or worked on the wrong side of the tracks, it would be extremely dangerous to have to wait for police, ambulance, or fire truck in an emergency situation. This current danger

does not go away and only gets worse with the addition of more rail traffic and people can die in this situation.

Rail Traffic Page 403 - High – There are 81 grade crossings of the PS&P Railroad between Centralia and Hoquiam in this 59 mile rail system. Many of these are the only means to a business or property and the delays are non mitigatable.

Response GP94-36

Comment acknowledged.

Comment GP94-37

Rail Traffic Page 404 – High – Port Industrial Road in Aberdeen has 17,310 vehicles per day and the wait time will be awful at this intersection. Can people be inconvenienced this much and the report does not address this truthfully.

Response GP94-37

Draft EIS Section 3.16, *Vehicle Traffic and Safety*, describes the potential impacts of increased rail traffic on vehicle traffic, including grade-crossing delay and queuing at nearby intersections. Figure 3.15-6 shows select grade crossings east of Poynor Yard. For detailed vehicle delay information, refer to Section 3.16.5.2, *Proposed Action*, and Appendix L, *Vehicle Traffic Analysis.*

Comment GP94-38

Rail Traffic Page 410 – High – Emergency Services at the Olympic Gateway Plaza is blocked for 35 minutes. This is a large shopping area and this impacts the local business in a significant way. Financial Compensation is needed.

Response GP94-38

Final EIS Section 3.16.7, *What mitigation measures would reduce impacts on vehicle traffic and safety?* identifies the measures to mitigate impacts on vehicle traffic and safety. Refer to the Master Response for Mitigation Framework for a discussion of how mitigation measures were identified.

Comment GP94-39

Vehicle Traffic Page 421 – High – Due to blockage of the Emergency Access to the Olympic gateway Plaza, Two paved recreational trails are suggested for emergency vehicles limited to 8.5 feet high. This is NOT a solution.

Response GP94-39

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Comment GP94-40

Vessel Traffic Page 441 – High – A 9 foot difference in tidal changes can make a difference on a vessel or barge to flow freely through the Grays Harbor or to run Aground. This is not the best location for a 24 / 7/ 365 operation that depends on the movement of product.

Response GP94-40

Draft EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels*, provides information about navigable windows based on tidal heights.

Comment GP94-41

Environmental Health and Safety page 473 – High – No HAZMAT Team is in the immediate vicinity of the project area from Centralia to the Port of Grays Harbor. Furthermore, 35 % Statewide has no Type 1 Hazardous Response Team and 12 % Statewide has no Hazardous Response Team at All. These Statistics make this location extremely dangerous to employees, residents and visitors in the area. HAZMAT Teams from Tacoma or Olympia are 2 to 3 hours away.

Response GP94-41

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP94-42

Environmental Health and Safety Page 482 – High – A small spill of 200 gallons once every 25 years to a large spill of 8,400,000 gallons once every 50,000 years is unrealistic for the existing methanol operations.

Environmental Health and Safety Page 485 – High – A small spill of less than 30,000 gallons once every 9 years to a large spill of 8,400,000 gallons once every 40,000 years is unrealistic for the crude oil operations.

Response GP94-42

Refer to the Master Response for Risk Assessment Methods for a discussion about the assumptions, data sources, and methods used in the assessment of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*.

Comment GP94-43

Environmental Health and Safety Page 497 – High – The recent accidents on the PS&P Railroad are as follows:

There were four recent derailments on the PS&P rail line, all in April and May 2014. These derailments did not involve oil spills.

- On April 29, two cars derailed at 5 mph at South Washington Street in Aberdeen due to wide

gauge (track separation).

- On May 9, seven cars derailed at 6 mph at Heron Street in Aberdeen due to wide gauge.
- On May 15, 10 cars derailed at 10 mph near Montesano due to thermal track misalignment.
- On May 21, 11 cars derailed at 5 mph at Blakeslee Junction due to a combination of train makeup and track geometry design.

Had these derailments been petroleum products the damage could have been catastrophic.

Response GP94-43

Comment acknowledged.

Comment GP94-44

Environmental Health and Safety Page 503 – High – This is an example of the double talk in this report and the truth is that 14 recent Crude Oil incidents did result in fires and explosions.

Although fires or explosions can result from spills resulting from events like collisions and derailments, long-term historical data show that most spills do not result in fires or explosions. A fire or explosion would be less likely to occur than a spill. While there have been multiple recent derailments of trains on main lines that resulted in fires or explosions, the chance of an extreme derailment is very limited in the study area because of the slow speeds on the PS&P rail line, which are slower than typical mainline speeds. In general, large derailments from high-speed trains lead to releases from multiple rail cars. The energy involved in high-speed derailments and the resulting scatter of rail cars yield the greatest chance of a fire that affects other rail cars and possibly result in an explosion.

Response GP94-44

Refer to the Master Response for Risk Assessment Methods for a discussion about the assumptions, data sources, and methods used in the assessment of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*.

Comment GP94-45

Environmental Health and Safety Page 513 – High – The recent Grays Harbor incidents emphasize that the policy and procedures are inadequate and will only get worse and are not mitiagable. To have a potential three crude oil facilities at this site is an accident waiting to happen. Good stewardship of the land and water should be criteria for a new facility and bad stewardship should not be rewarded with more problems.

Response GP94-45

Comment acknowledged.

Comment GP94-46

Grays Harbor has navigational challenges, including a bar at the entrance to the harbor, a constrained navigation channel for deep-draft vessels, and sharp turns in the channel. The substrate

of the channel is generally sand and mud, which, in addition to the requirement for vessels to be double-hulled, reduces the potential of spill due to groundings.

Response GP94-46

This information was considered in the analysis of risks presented in the Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*.

Comment GP94-47

From 2008 to 2014, several vessel incidents occurred in Grays Harbor, including one methanol spill from a vessel. Five incidents were caused by loss or reduction in propulsion. One of these resulted in a vessel grounding with no damage or spill and one resulted in an allusion with a buoy with no damage or spill. In 2011, a ship spilled 200 gallons of methanol to water because of human error in connecting a hose to a flange for a transfer.

In 1988, the barge *Nestucca* spilled 231,000 gallons (5,500 barrels) of heavy fuel oil along Washington State's outer coast, offshore of the entrance to Grays Harbor. The barge was being towed and the line broke after crossing the Grays Harbor bar. The tug collided with the barge and ripped a gash in the hull, causing a spill. The oil spill affected beaches as far south as Oregon and north to Vancouver, British Columbia. Because of the spill, the Washington State Department of Ecology (Ecology) Spills Program and the Pacific State – British Columbia Oil Spill Task Force were established. Since that incident, Washington State laws and federal laws for oil spill prevention, preparedness, and response were implemented, including requirements for double-hulled vessels and natural resource damages.

Response GP94-47

Final EIS Chapter 4, Section 4.2, *Applicable Regulations*, and Appendix B, *Applicable Regulations*, include this information. Both have been revised to reflect updates to the regulatory environment since the issuance of the Draft EIS.

Comment GP94-48

Environmental Health and Safety Page 522 – High – The inerting of the barges for Bakken Crude Oil is necessary but it is overlooked that the inerting of the barges is required for the Canadian Tar Sands Oil and Dilbit as well as any Crude Oil production that could come to the Port of Grays Harbor. Crude Oil is unpredictable in physical and chemical properties and is dangerous. By comparison, refined petroleum products are predictable in physical and chemical properties and at this time would not require inerting of barges.

Response GP94-48

All crude oil coming to the proposed facility would be required to be made inert, consistent with applicable safety regulations.

Comment GP94-49

Environmental Health and Safety Page 533 to 540 – High –

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it

occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for adverse impacts on human health, animals, plant , recreation resources, aesthetics, cultural resources, tribal resources, . However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill.

This Boiler Plate Statement is repeated several (seven) times indicating that not only could it happen, but it will happen and the damage will be adverse. This Terminal for the Westway Project is only an incremental financial opportunity as a middle man operation charging a fee per barrel transferred. This project should NOT be Approved as the Crude Oil is going to market now without any new Crude Oil by Rail to Marine Vessel Terminal and especially at the environmentally sensitive Grays Harbor.

Environmental Health and Safety = Page 540 to 545 -High -

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill, fire or explosion and the extent of the spill, fire or explosion would reduce the potential for adverse impacts on human health, animals, plant , recreation resources, aesthetics, cultural resources, tribal resources, . However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, fire or explosion nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire or explosion.

This Boiler Plate Statement is repeated several (seven) times indicating that not only could it happen, but it will happen and the damage will be adverse. This Terminal for the Westway Project is only an incremental financial opportunity as a middle man operation charging a fee per barrel transferred. This project should NOT be Approved as the Crude Oil is going to market now without any new Crude Oil by Rail to Marine Vessel Terminal and especially at the environmentally sensitive Grays Harbor.

Response GP94-49

Comment acknowledged.

Comment GP94-50

Extended Rail Analysis Page 566 – High

The rail systems are an aging 125 year old system that even in the perfect world are not maintained or managed for the rapid growth of unit trains of fossil fuels like crude oil, coal and propane. The long and repetitive weight has a large bearing on the recent surge of incidents especially at bridges, rivers, and curves. If there are problems now, there will be incrementally more problems in the future as the maintenance cannot keep up with the growth.

This analysis of the BNSF lines suggests the following conditions by 2035.

- Pasco-Spokane at 170% utilization.
- Seattle-Spokane via Wenatchee at 150% utilization.
- Spokane-Hauser Junction, Idaho at 150% utilization.
- Vancouver-Pasco at 140% utilization.
- Seattle-Portland and Everett-Burlington are projected to be near the 100% utilization mark.

Response GP94-50

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS.

Comment GP94-51

Extended Rail System – Page 569 – High

The following statement indicates that the state of Washington and Specifically the WADOT is totally unprepared for the crude oil and coal unit trains. Since they are an integral part of the overall decision on the many proposed terminal facilities, the Westway Project needs to be rejected.

The WSDOT State Rail Plan states it did not include crude oil movement by rail or coal export terminal proposals in Washington State for the 2035 projection. The Millennium Bulk Terminals – Longview coal export proposal includes an estimate of 16 train trips a day (Millennium Bulk Terminals—Longview 2013). The Gateway Pacific Terminal coal and bulk export proposal includes an estimate of 18 train trips a day (Pacific International Terminals 2012).

Since this report overlooked all the Crude Oil Terminal, Refinery, Propane Terminal , Butane Terminal at Longview, this report is meaningless with old data and statistics.

Response GP94-51

Rail traffic is highly dynamic and fluctuates because of changing demand. The 2035 rail traffic estimates are intended to provide a "snapshot" of estimated rail traffic volumes; the rail traffic estimates do not represent actual volumes for 2035.

Comment GP94-52

Cumulative Impacts – Page 582 – High The 1 hour NO2 Standard would be exceeded if all the three crude oil projects are approved in the Grays Harbor Area. This Standard cannot be exceeded.

Response GP94-52

As stated in Draft EIS Chapter 6, Section 6.5.1, *Air*, a violation of the NO_2 standard would not likely occur for the following reasons.

- The standard requires that the 3-year average of NO_2 be exceeded.
- The analysis conservatively assumed a high percentage of NO_2 converted.
- All of the mobile source activity as previously described would have to occur simultaneously during meteorological conditions that have the poorest dispersion conditions (i.e., very low wind speeds and a strong temperature inversion).
- The maximum 1-hour background concentration would need to occur simultaneously.

Additionally, incorporation of the mitigation proposed in in Section 6.5.1.3, *Mitigation Measures*, would further reduce the risks of exceeding applicable air quality standards.

Comment GP94-53

Cumulative Impacts – Page 602 – High – If all the crude oil projects are approved in the Port of Grays Harbor, the unit trains will go from 3.1 per day to 7.35 per day and the wait time at one grade crossing will be 3 hours and 23 minutes. This is unacceptable to anyone.

Response GP94-53

Comment acknowledged.

Comment GP94-54

Cumulative Impacts - Page 632 – High – The cumulative adverse impacts are significant and are a significant change in the way of life for all people impacted by the Port of Grays Harbor Crude Oil Terminals. Home Values are degraded, fishing is decimated, the beauty, recreational and cultural resources are tarnished, and people die from the effects of the crude oil. The prescription in this report is to: "Take two aspirins and call me in the morning" is totally unacceptable.

With the cumulative projects, although the chance of an incident occurring would be cumulatively greater, the potential consequences of any one event would be similar to those described in Chapter 4, Environmental Health and Safety. While the increased activities from the concurrent operation of all cumulative projects would increase the risk of a release, the expected impacts from any of the release scenarios would remain the same. As discussed in Chapter 4, Section 4.7, Impacts on Resources, exposure to crude oil could result in adverse impacts on the following resources.

- **Water, plants, and animals.** In general, crude oil can degrade water quality and result in toxic exposure of plants and animals to harmful chemicals. Depending on the specific circumstances, exposure can cause tissue damage in plants and animals that can affect respiration, reproduction, and behavior. In extreme cases, exposure can result in death.
- **Tribal resources.** Harm to natural resources used by tribes for commercial, subsistence, or ceremonial purposes could result in adverse impacts on tribal resources.
- **Aesthetics, recreation, and cultural resources.** Crude oil can cause aesthetic impacts by coating the environment and resulting in large areas of reduced vegetative growth. These impacts can disrupt recreational activities if areas affected by spills have to be closed to prevent harm of exposure to people or to conduct cleanup activities. Spilled oil can also cause damage to historic structures or other important cultural resources. Depending on the circumstances of the incident and the nature of the cleanup activities, ground disturbance during cleanup may also adversely affect archaeological resources.
- **Human health.** Exposure to crude oil can adversely affect humans, primarily through exposure to harmful air pollutants in the first few minutes of a spill. Depending on the circumstances of the incident, if people inhale crude oil vapors, they may suffer irritation to their respiratory systems, which can cause dizziness, rapid heat rate, headaches, confusion, nausea, and / or vomiting.

Response GP94-54

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency

response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP94-55

Cumulative Impacts - Page 700 – High – The overall project will generate 82 construction jobs for Phase One and 46 Construction Jobs for Phase Two which will probably be out of area workers and short term. The Operations of the Westway Terminal at full build out will employ an additional 36 workers.

The Tax Revenue related to this project is $1,217,000 per year for the 49,041 BPD Crude Oil by Rail Terminal. The $1,217,000 Annual Tax Revenue divided by (49,041 BPD x 365 Days) = $0.06798 per Barrel. With Crude Oil Market Price between $40 and $100 per Barrel, is it worth $0.6798 per Barrel to the citizens of the State of Washington and more specifically the local Port of Grays Harbor Area?

Response GP94-55

Comment acknowledged.

Comment GP94-56

Appendix M – Risk Assessment Technical Review - Page 362 - HIGH– The Class 2 Railroad system is limited to 25 MPH or less and is as slow as 5 MPH on the Wynochee Bridge. This rail system cannot support this increased hazardous material traffic.

Appendix M – Risk Assessment Technical Review – Page 369 –LOW - The Rail Release Frequencies between 11 and 44,000 years is unrealistic numbers. The statistics need a reality check.

Appendix M – Risk Assessment Technical Review – Page 383 – MEDIUM - 33 million gallons of Methanol annually at Westway and 751.8 million gallons of Crude Oil annually. The potential for cross contamination is very possible as the methanol represents only 4 % of the total rail car product.

Appendix M – Risk Assessment Technical Review – Page 384 – HIGH - The Overall chance of an accident with loaded or unloaded railcars is 1.7 years. This is an extremely high risk and the project is too dangerous for this location.

Appendix M – Risk Assessment Technical Review – Page 386 – HIGH - The Overall chance of an accident with a Marine Vessel is once every 11 years. This is an extremely high risk and the project is too dangerous for this location.

Response GP94-56

The reference in the comment to an incident occurring once in 1.7 years is for the no-action alternative and as noted in Appendix M, *Risk Assessment Technical Report*, does not represent the

likelihood that a spill would occur but rather the chance than any incident might occur regardless of the potential for a release. Similar estimates for rail and vessel transport related to the proposed action are given on Draft EIS pages 4-8 and 5-6, respectively. These numbers represent the incremental chance of any incident associated with the proposed action. Similarly, they do not represent the equivalent chance of a spill. The combined risks of a spill are not presented in the Draft EIS for the reasons discussed in the Master Response for Risk Assessment Methods.

GP95, **Brake, William**

Comment GP95-1

Brake—Comments on Rail Transportation System as it relates to the Grays Harbor Terminals of Westway and Imperium on the DEIS

November 18, 2015

City of Hoquiam—Brian Shay

Washington Department of Ecology – Sally Toteff

Subject: Rail System related to the Port of Grays Harbor Crude Oil Terminals

Westway and Imperium Draft Environmental Impact Statement Comments

I am a retired Energy Engineer that lives "Up Track" of the Proposed Grays Harbor Crude Oil Terminal Projects of Westway and Imperium.

The impacts of this project go well beyond Grays Harbor and its communities. The railroad hauling this explosive crude go right through the heart of two of Washington's largest cities, Spokane and Vancouver, as well as the many smaller communities along the Columbia River and I-5 Corridor. The consequences of an explosive derailment in these communities would likely result in many deaths and the destruction of infrastructure. When the responsible company is sorted out....and then goes bankrupt, who will pick up the tab? The profits are capitalized, the losses are socialized, landing square in the lap of our state and local residents.

Response GP95-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP95-2

The Washington Administrative Code - WAC197-11-060 (4) (b) states that, "In assessing the significance of an impact, a lead agency <u>shall not limit</u> its consideration of a proposal's impacts only

to those aspects within its jurisdiction, including local or state boundaries." Clearly at the very least WA law requires that impacts on affected areas within the state must be considered.

Response GP95-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP95-3

However, there is no need for additional crude oil terminals in the Pacific Northwest as all the crude oil product is currently going to destinations now without the construction of new terminals. This is only a business opportunity for a "Middleman Operation" to obtain a fee per barrel delivered. The profit goes to the terminal; the costs of an environmental/human disaster are borne by the public.

Response GP95-3

Comment acknowledged.

Comment GP95-4

Additionally, there is No HAZMAT Team in the immediate vicinity of the project area from Centralia to Hoquiam and a serious spill, explosion, or fire requires a 2-3 hour wait for specialized teams to arrive from Tacoma or Olympia. The rest of the state has very limited emergency response capabilities for the rail systems.

Response GP95-4

Draft EIS Chapter 4, Section 4.2.1, *What framework prevents incidents from happening?* describes the formalized planning framework in place to address risks related to oil spills, fires, or explosions from the terminal operations, rail transport, or vessel transport. The responsible party may vary during the transport of crude oil. This section describes the requirements for planning and preventive equipment and design. Section 4.2.2, *What framework prepares for an incident?* describes federal and state regulations to prepare for an incident, the integration of plans, and drill and exercise requirements.

Final EIS Section 4.2.3, *What framework provides responses to an incident?* has also been updated to better reflect existing response capabilities and resources in the study area, including information identifying existing gaps from the Marine and Rail Oil Transport Study (Ecology 2015). Final EIS Section 4.7, *Impacts on Resources,* has been updated to better reflect how the proposed action could affect emergency service responses.

Final EIS Chapter 4 reflects additional mitigation measures proposed to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

Chapter 4, *Environmental Health and Safety*, identifies other proposed measures to ensure that broader prevention, preparedness, and response planning involves the appropriate stakeholders and that updates to any plans applicable to reducing risks related to the proposed action contain

appropriate applicant information and participation. To the extent possible, as outlined in the Master Response for Mitigation Framework, measures that address the need for more coordinated and focused planning clarify the role of the applicant as appropriate.

Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7 describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP95-5

The rail systems are an aging 125 year old system that even in the perfect world are not maintained or managed for the rapid growth of unit trains of fossil fuels like crude oil, coal and propane. The long and repetitive weight has a large bearing on the recent surge of incidents especially at bridges, rivers, and curves. If there are problems now, there will be incrementally more problems in the future as the maintenance cannot keep up with the growth

Response GP95-5

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP95-6

For example, there are 52 rail bridges and culverts and 37 named and unnamed tributaries of the Chehalis River that are crossed by the PS&P Railroad and the 2,600 square mile watershed has no flood control facilities and is a wild river.

Response GP95-6

Comment acknowledged.

Comment GP95-7

Additionally, there is No Spill Plan for the Puget Sound & Pacific - This Class 2 railroad is limited by regulation to a maximum of 25 MPH. It is a "Ma and Pa" Railroad and should not be transporting loads that are capable of extreme environmental and safety hazards. It is sheer folly to expect that a railroad and its accompanying bridges, built over 100 years ago could be capable of handling products never dreamed of then. It was built to haul wood products, easily cleaned up after

inevitable derailments. It was not built to handle explosive, heavy loads. To even consider allowing this is to put the state at serious risk of law suit on the basis of casual disregard for human life.

Response GP95-7

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Refer to the Master Response for Risk Assessment Methods for a discussion about the assumptions, data sources, and methods used in the assessment of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*.

Comment GP95-8

The wait time at grade crossings near Aberdeen and Hoquiam is currently at 1 hour and 10 minutes and this will grow to 1 hour and 52 minutes with the addition of the Westway Terminal with similar times for the Imperium Project. The wait time is NOT a problem for the rail line but is a significant danger to vehicle traffic. If I lived or worked on the wrong side of the tracks anywhere in the state of Washington, it would be extremely dangerous to have to wait for police, ambulance, or a fire truck in an emergency situation. This current danger does not go away and only gets worse with the addition of more rail traffic and people can die in this situation.

Response GP95-8

Comment acknowledged.

Comment GP95-9

The Washington Department of Ecology, the air quality assessment in this DEIS is not taking into account the amount of diesel particulate matter because "this regulation only applies to stationary sources, not mobile sources such as rail locomotives. There are no local or state regulations for DPM (Diesel Particulate Matter) emissions from mobile sources." Mobile Emissions are regulated by the Federal Environmental Protection Agency and not the Washington Department of Ecology.

Response GP95-9

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of

increased risk is not considered significant. The proposed mitigation measure for air quality monitoring near the project site is no longer warranted.

Comment GP95-10

Of interest is the Draft Environmental Impact Statement acknowledges the risks of pollution, noise and, oh yes, catastrophic explosions from oil trains, the likes of which leveled Lac-Mégantic, Quebec, in July 2013. Disappointingly, having recognized the issues involved, the report simply says there's no way to mitigate them and recommends moving ahead. With a bureaucratic shrug of the shoulders, the concerns of communities from Spokane to Vancouver and onto Aberdeen are dismissed.

Naturally, the Washington Comprehensive Plan disagrees, and so do I. While it's true that there's not a lot the City of Hoquiam can do itself to mitigate the impact of its project, it can force Westway and Imperium to do something about it.

Response GP95-10

For more information about the development and implementation of mitigation measures, refer to the Master Response for Mitigation Framework.

Comment GP95-11

I urge a raft of measures that are within Westway and Imperium's control: advanced notification to local emergency personnel of all shipments, limits on storage of crude-oil tanks in urban areas, funding to train emergency responders, cars with electronically controlled pneumatic brakes, money for rail-safety improvements, implementation of Positive Train Control protocols and, most importantly, a prohibition on shipments of unstabilized crude oil that hasn't been stripped of the volatile elements that made Lac-Mégantic and other derailments so catastrophic.

Response GP95-11

Refer to Response to Comment GP95-4. For information regarding the approach to identifying mitigation, refer to the Master Response for Mitigation Framework.

Comment GP95-12

Due to federal laws, cities along the railway lines have no ability to control what goes through. Only the City of Hoquiam, now, while the project is still on the drawing board, has the authority to set reasonable limits and conditions on a project that puts millions of people along the railroad in harm's way.

I urge the Hoquiam City Council to use its discretionary authority in this matter to protect those of us who have no say in the process.

The Tax Revenue of the two projects is $2,858,000 annually and is $0.0616 per barrel for a product valued between $40 and $100per barrel. A single rail car represents $41 Tax Revenue.

We Can Do Better.

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Response GP95-12

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP96, Brake, William

Comment GP96-1

BRAKE—Marine System Comments for DEIS Westway and Imperium

November 24, 2015

City of Hoquiam—Brian Shay
Washington Department of Ecology – Sally Toteff

Subject: Marine System related to the Port of Grays Harbor Crude Oil Terminals

Westway and Imperium Draft Environmental Impact Statement Comments

I am a retired Energy Engineer that lives "Up Track" of the Proposed Grays Harbor Crude Oil Terminal Projects of Westway and Imperium. My 35 year work experience has demonstrated the wild and unpredictable crude oil dangers - far more than the dangers of the refined products.
The impacts of this project go well beyond Grays Harbor and its communities. The railroad hauling this explosive crude go right through the heart of two of Washington's largest cities, Spokane and Vancouver, as well as the many smaller communities along the Columbia River and I-5 Corridor. The consequences of an explosive derailment in these communities would likely result in many deaths and the destruction of infrastructure.

When the responsible company is sorted out....and then goes bankrupt, who will pick up the tab? The profits are capitalized, the losses are socialized, landing square in the lap of our state and local residents.

However, there is no need for additional crude oil terminals in the Pacific Northwest as all the crude oil product is currently going to destinations now without the construction of new terminals. This is only a business opportunity for a "Middleman Operation" to obtain a fee per barrel delivered. The profit goes to the terminal; the costs of an environmental/human disaster are borne by the public.

Response GP96-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel

transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP96-2

Additionally, there is No HAZMAT Team in the immediate vicinity of the project area as well as off shore and a serious spill, explosion, or fire requires a 2-3 hour wait for specialized teams to arrive from Tacoma or Olympia.

Response GP96-2

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP96-3

The Port of Grays Harbor is a shallow water port influenced by 9 foot tidal changes twice a day. A deep draft marine vessel can easily run aground due to shallow water depth.

Response GP96-3

Draft EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels*, provides information about navigable windows based on tidal heights.

Comment GP96-4

Historically, there have been several vessel incidents in Grays Harbor: 28 from tankers and tank barges in 13 years. One spill affected beaches as far south as Oregon and north to Vancouver, British Columbia. The DEIS seems to minimize the spills, because they were "less than a full discharge of contents." Per the DEIS, the likelihood of very large releases would remain low. As noted previously, it is not possible to predict the timing or magnitude of an Incident Several Species that could be affected by a significant oil spill include: Fish, Crabs, shellfish, double-crested cormorants, pied-billed grebe, belted kingfisher, Caspian tern, Western sandpiper, Dunlin, and Sanderling, Bufflehead ducks and common goldeneyes, common mergansers, harbor seals, sea lions, killer whales, sea turtles, humans! (Yes, we can suffer mucous membrane inflammation from the oil or its fumes), pink-footed shearwater, black footed albatross, northern fulmar, beavers, river otters, bald eagles (can be exposed by feeding on injured or dead fish), clams, mussels, barnacles, snails, algae and plankton, salmonids protected under the Endangered Species Act, migratory birds, frogs, perhaps others unnamed.

Response GP96-4

Draft EIS Chapter 4, Section 4.6, *Environmental Health Risks—Vessel Transport*, presents the analysis of risk of oil spills, fires, and explosions during vessel transport related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Section 4.6.3 that would reduce the likelihood of a spill reaching the environment and

the potential impacts of an incident. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP96-5

Tribal fishing resources could be affected – Grays Harbor is home port for fishing vessels in ocean fisheries, and this is where fishers offload catch for these fisheries. Quinault also manage razor clams for commercial and subsistence harvest on beaches on and off the reservation adjacent to Grays Harbor. Fire could also result in the exclusion of tribal members from traditional areas during incident response, with a recovery estimate of years, if ever

Response GP96-5

Final EIS Chapter 4, Section 4.7.1.7, *Oil Spills, Fires, and Explosions*, reflects additional information to clarify potential impacts on tribal resources in the event of an oil spill, fire, or explosion.

Comment GP96-6

Wrong place for oil terminals: dramatic increase in oil tanker and barge traffic in Grays Harbor invites an oil spill disaster. If both terminals were built, 638 tankers and barges of oil would need to traverse Grays Harbor every year. The twelve mile Grays Harbor shipping channel is narrow and shallow, subject strong currents and has limited staging area for ships and tugs. An additional 638 trips through the Harbor by tankers and barges – both those carrying crude oil and those empty to receive the crude oil - would only add to congestion and collision risk.

The largest Panamax class tankers that would carry oil through Grays Harbor can hold almost 17 million gallons and are nearly three football fields in length.

Response GP96-6

As described in Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, the proposed action would result in a maximum of 238 vessel transits under maximum throughput operations; half of these trips would be laden vessels. As described in Chapter 6, *Cumulative Impacts*, the cumulative projects—the proposed action, the REG [formerly Imperium Terminal Services] Expansion Project, and Grays Harbor Rail Terminal Project —would add 758 trips. Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions.

Comment GP96-7

For perspective, the Exxon Valdez disaster in Alaska in 1979 spilled about 11 million gallons.

The Washington State Department of Fish and Wildlife stated “Grays Harbor is an area particularly sensitive to the adverse effects of oil spills.”

A major oil spill could devastate marine resource jobs which support more than 30% of Grays Harbor’s workforce according to a 2013 study by the University of Washington.

An economic study commissioned by the Quinault Indian Nation found that more than 150 tribal commercial fishermen could lose their jobs, resulting in a direct loss of as much as $20 million in wages and up to $70 million in revenue for affected businesses.

In 2014 Washington residents took an estimated 4.1 million trips to the Washington Coast spending $481 million. More than one-third of those visits were to Grays Harbor County to enjoy its spectacular and productive coastal and ocean waters.

Grays Harbor and the region are no strangers to oil spills. The Northwest has experienced two dozen spills and near misses over the last two decades. In 1988, the Nestucca barge holed off Grays Harbor spilling "only" 231,000 gallons of marine bunker oil, killing an estimated 3,500 seabirds. The oil sheen was seen from Oregon to the Strait of Juan De Fuca.

If built the two terminals together could store an astounding 114 million gallons, or the equivalent of 4,000 oil tank cars.

Response GP96-7

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP96-8

Grays Harbor sits in a major earthquake and tsunami zone. Geologists say the odds of a "big" Cascadia earthquake happening in the next 50 years are approximately one in three. The odds of the "very big" one are roughly one in 10.

According to the U.S. Geological survey the overdue earthquake could produce waves from 20 feet to more than 100 feet high. We can expect that wall of water would topple storage tanks washing away all the oil and possibly ignite.

Response GP96-8

Refer to Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP96-9

Such a huge surge in oil vessel traffic, in a place not suited to it in the first place, invites disaster. We know from disasters like the Deepwater Horizon in the Gulf of Mexico and Exxon Valdez in Alaska that one major oil spill can be devastating: contaminating coastlines, killing fish and wildlife,

destroying livelihoods, and ruining property values. The damage can last for decades, even generations. – Larry Thevik, long-time fishermen from Ocean Shores

For example, there are 52 rail bridges and culverts and 37 named and unnamed tributaries of the Chehalis River that are crossed by the PS&P Railroad and the 2,600 square mile watershed has no flood control facilities and is a wild river.

Response GP96-9

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP96-10

Only the City of Hoquiam, now, while the project is still on the drawing board, has the authority to set reasonable limits and conditions on a project that puts millions of people along the railroad in harm's way.

I urge the Hoquiam City Council to use its discretionary authority in this matter to protect those of us who have no say in the process. There is Significant Adverse Environmental Impact that cannot be mitigated for these crude oil projects.

The Tax Revenue of the two projects is $2,858,000 annually and is $0.0616 per barrel for a product valued between $40 and $100 per barrel. A single rail car represents $41 Tax Revenue.

We Can Do Better.

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Response GP96-10

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP97, Brake, William

Comment GP97-1

Brake - Comments on DEIS for Terminal Systems for Westway and Imperium Crude Oil Facilities at Grays Harbor Washington

November 22, 2015

City of Hoquiam – Brian Shay
Washington Department of Ecology – Sally Toteff

Subject: Terminal System related to the Port of Grays Harbor Crude Oil Terminals
Westway and Imperium Draft Environmental Impact Statement Comments

I am a retired Energy Engineer that lives "Up Track" of the Proposed Grays Harbor Crude Oil Terminal Projects of Westway and Imperium.

The impacts of this project go well beyond Grays Harbor and its communities. The railroad hauling this explosive crude go right through the heart of two of Washington's largest cities, Spokane and Vancouver, as well as the many smaller communities along the Columbia River and I-5 Corridor. The consequences of an explosive derailment in these communities would likely result in many deaths and the destruction of infrastructure.

When the responsible company is sorted out....and then goes bankrupt, who will pick up the tab? The profits are capitalized, the losses are socialized, landing square in the lap of our state and local residents.

However, there is no need for additional crude oil terminals in the Pacific Northwest as all the crude oil product is currently going to destinations now without the construction of new terminals. This is only a business opportunity for a "Middleman Operation" to obtain a fee per barrel delivered. The profit goes to the terminal; the costs of an environmental/human disaster are borne by the public.

Response GP97-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP97-2

Additionally, there is No HAZMAT Team in the immediate vicinity of the project area from Centralia to Hoquiam and a serious spill, explosion, or fire requires a 2-3 hour wait for specialized teams to arrive from Tacoma or Olympia. If there is a Tsunami or Earthquake in the Pacific Northwest, the wait time for HAZMAT could be days or weeks as there may be other higher priorities in the major urban population centers.

Response GP97-2

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP97-3

It is reported in the DEIS that there is between a 30 % and 50 % Probability of a Magnitude 6.0 or greater earthquake in the area in the next 50 years indicates this is not the ideal site for crude oil facilities. In general, the Japanese earthquake and tsunami was an epic disaster, but the resulting industrial failure (Fukishima) was cataclysmic. A great NW quake (magnitude+9.0) occurs every 350 years on average, and is now imminent or overdue. Grays Harbor is in the quake zone, the tsunami zone and the liquefaction zone. No industrial/chemical facility should be allowed there! Additionally, the Westway and Imperium Terminal Facilities are built on extremely poor soil of dredged and fill material requiring significant engineered steel pipe pilings being built between 75 and 130 feet below grade. Lastly, there are 22 sensitive receptors within 1 mile of the facilities like parks, child care facilities, health care facilities, schools, and recreational facilities and farmers markets. This is unacceptable proximity to a Crude Oil Terminal.

Response GP97-3

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Final EIS Chapter 4 has been revised to include an additional applicant mitigation measure to improve local emergency planning and response that includes development of a geographic information system (GIS) layer that identifies critical facilities near the facility and along the PS&P line. The facilities will include schools, hospitals, community centers, and parks within 0.5 mile of the rail line. The GIS layer will be provided to the Local Emergency Planning Commission, local fire departments, and Ecology. The study will be submitted prior to beginning operations. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP97-4

The 100 year flood zone elevation used in this report is meaningless based on two recent events. In December 3, 2007 the Interstate – I-5 was closed for 20 miles due to flooding and January 7, 2009 the same area was closed due to flooding of the Chehalis River. We are not exempt from flooding for the next 94 years so more extensive engineering review is required at the Terminal Sites as they are on the banks of the Chehalis River.

Response GP97-4

The floodplain information provided in the Draft EIS is based on the Federal Emergency Management Agency's (FEMA) floodplain mapping. FEMA's Federal Insurance Rate Maps are the official maps on which FEMA delineates the special flood hazard areas for regulatory purposes

under the National Flood Insurance Program. Special flood hazard areas are also known as the 100-year floodplain, which are areas that have a 1% annual chance of flooding. The 100-year floodplain is the area where the floodplain management regulations of the National Flood Insurance Program must be enforced. The 2013 preliminary FEMA maps that are described in Chapter 3, Section 3.3, *Water*, are the appropriate standard for reference for the proposed action. RISK Map studies that were used to delineate the 1% floodplain area are based on the best available and up-to-date information recently gathered from Light Detection and Ranging (LIDAR) and other technology that was not previously available when older FEMA floodplain maps were developed.

Comment GP97-5

The American Institute of Chemical Engineers details a facility checklist for Facility Siting as required under the OSHA 29 CFR 1910.119 Process Safety Management Program to protect the employees. The PSM Rule requires facility siting to be addressed in all Process Hazard Analysis. For a new facility, fulfilling this requirement can involve an analysis of plant layout and spacing between process units.

However, most PrHAs are performed on existing facilities. For existing facilities, PrHAs should include the severity of consequences of potential accidents involving co-located workers and adjacent facilities. Shielding, barricades, escape routes, control room location, and control room design for employees involved in the operation of the process should also be discussed. In addition, the impacts of vehicular traffic and of adjacent operations should be considered.

Example Checklist of Facility Siting Issues

General Considerations

1. Location of people relative to the unit

2. Location of critical systems

3. Dominant wind direction

4. Climate and weather extremes; earthquake, flooding, windstorms

5. Site topography

6. External hazards or threats (fire/explosion/toxic release from

7. nearby process or facility; aircraft; subsidence; sabotage)

8. Traffic flow patterns and clearances from process vessels and lines

9. Security and reliability of all critical feeds and utilities

10. Command center and alternate command center locations

11. Evacuation routes, emergency exits, safe rally spots

Control Room

12. Minimum occupancy; only essential functions during emergencies

13. Control room construction

14. Fresh air intakes location/isolation; temporary safe havens

15. Control room location relative to unit, columns, and pipe bridges

Process Facilities

16. Area electrical classification

17. Accessibility for mechanical integrity (sampling, maintenance, repairs)

18. Protection of piping and vessels from vehicles and forklifts

19. Protection of small-bore lines, fittings from external impact, personnel

20. Routing of process piping, critical controls cable trays, critical utilities

21. Vent, drain, and relief valve discharge locations

Loading/Unloading and Storage Facilities

22. Incompatible materials segregated; storage, dikes, sumps, drains, waste

23. Siting, labeling of unloading spots for incompatible materials

24. Storage tank separation distances (to process, between tanks)

25. Spill control, drainage direction, destination, treatment capacity

Fire Protection

26. Access for fire fighting and any other emergency services

27. Ignition sources (continuous, occasional/intermittent, uncontrolled)

28. Access to hydrant, indicator, and deluge valves

Accident Mitigation

29. Detection of leaks/ruptures 30. Emergency shutdown switch locations

31. Accessibility of isolation valves

32. Potential for fire/explosion in unit affecting other equipment

33. Critical controls, mitigation, communication, and fire protection systems functional and accessible after initial explosion or release

34. Back-up power supply/redundant feeds for critical electrical systems

35. Water supply for fire fighting

36. Routing of utilities

Personnel Protection

37. Passageways, pedestrian traffic patterns vs. hazardous locations

38. SCBA/respirator locations; accessibility on all shifts

This information was not addressed in the Westway and Imperium DEIS and is very important for the protection of the employees. To ignore this regulation is to ignore the safety of the employees.

The OSHA Process Safety Management (PSM) Regulations protect the employees and the EPA Risk Management Program (RMP) protects the public (neighborhood) from the harmful effects of an industrial facility in an urban environment. Only the City of Hoquiam, now, while the project is still on the drawing board, has the authority to set reasonable limits and conditions on a project that puts millions of people along the railroad in harm's way with the very volatile Bakken Crude Oil.

I urge the Hoquiam City Council to use its discretionary authority in this matter to protect those of us who have no say in the process.

Response GP97-5

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP97-6

The entire world is grappling with the imminent problem of global climate change. One of the major contributors is the use of fossil fuels. Now is not the time to build out risky infrastructure in a dying industry. To allow this project to move forward is to support a dinosaur industry at the expense of the future of the planet and its inhabitants.

The Tax Revenue of the two projects is $2,858,000 annually and is $0.0616 per barrel for a product valued between $40 and $100 per barrel. A single rail car represents $41 Tax Revenue.

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Response GP97-6

Comment acknowledged.

GP98, **Brake, William**

Comment GP98-1

Brake - Public Comments on Westway and Imperium related to Green House Gas Emissions for the entire project proposals from the crude oil rail loading terminal some place in the mid western states or Canada to the proposed Terminals in Hoquiam Washington and to the final destinations to domestic US refineries or to world markets.

November 26, 2015

City of Hoquiam - Brian Shay

Washington Department of Ecology - Sally Toteff

Subject: Westway and Imperium Incremental Emissions Comments for Crude Oil Trans-Shipment DEISGreen House Gas Emissions Calculations

I live "Up-Track" in Vancouver Washington and am a retired Professional Engineer with a 35 year career in the energy business.

These project proposals intend to deliver crude oil by rail from the Mid-Western United States, some 1,200 miles away, and go through the communities of Spokane, Kennewick, White Salmon, Washougal, Camas, Vancouver, Felicia, Ridgefield, Kalama, Longview, Chehalis, Elma, Montesano, Aberdeen, and Hoquiam. At the Terminal, the crude oil will be off loaded and stored in new tankage for delivery to marine vessels for unknown destinations. If it is US Crude, it is required to go only to US Refineries; however, if it is Canadian Crude Oil, it is allowed to go to world markets.

The Westway and Imperium DEIS issued August 31, 2015 details the Green House Gas Emissions in Metric Tons of C02 Equivalent for the Project Construction, Rail Transit, Rail Switching, Vessel Transit, Vessel at Dock, and On Site Operations. The total combined C02 Emissions are 77,968 Metric Tons Annually.

However, this is only part of the story as the limited scope of the DEIS only covers 59 miles of the PS&P Rail Road and 3 miles off shore of the Marine Dock at Hoquiam. The true picture is a 1,200 mile rail road one way trip and an estimated 500 mile marine transit to typical California and Puget Sound Refineries. Additionally, the crude oil could go to Alaska or Hawaii Refineries.

The revised CO2 Equivalent is 1,484,878 Metric Tons and is 19 times larger Green House Gas Emissions. What does the 1,484,878 Metric Tons of CO2 Equivalent mean in terms of Green House Gas?

Using the Green House Gas Equivalencies Calculator by the EPA, it helps to understand translating the abstract measurement into concrete terms that you can understand, such as the annual emissions from cars, households, or power plants. This calculator may be used in communicating your greenhouse gas reduction strategy, reduction targets, or other initiatives aimed at reducing greenhouse gas emissions.

1,484,878 Metric Tons CO2 Annually Equals

312,606—Passenger vehicles driven for one year

3,535,423,810—Miles driven by an average passenger vehicle

532,214—Tons of waste sent to the landfill

76,109—Garbage trucks of waste recycled instead of land filled

167,084,280—Gallons of gasoline consumed

1,594,928,034—Pounds of coal burned

19,657—Tanker trucks worth of gasoline

135,482—Homes energy use for one year

204,247—Homes electricity use for one year

7,962—Railcars worth of coal burned

38,840,649—Incandescent lamps switched to CFLs

3,453,205—Barrels of oil consumed

0.39—Coal-fired power plants for one year

38,073,795—Tree seedlings grown for 10 years Carbon Sequestered

1,217,113—Acres of US forests in one year Carbon Sequestered

11,465—Acres of US forests preserved from conversion to cropland in one year

Needless to say, these projects, Westway and Imperium, that seem small to many as compared to the many larger proposals in the Pacific Northwest have a SIGNIFICANT ADVERSE ENVIRONMENTAL IMPACT THAT CANNOT BE MITIGATED.

The Project Proposals for Westway and Imperium should be Denied.

Thank You for the Opportunity to express my professional engineering opinion on the Crude Oil Projects at the Port of Grays Harbor.

We Can Do Better.

Response GP98-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP99, **Brake, William**

Comment GP99-1

November 28, 2015
City of Hoquiam – Brian Shay
Washington Department of Ecology – Sally Toteff

Subject: Westway and Imperium - Explosive Power of Energy and Other Comments for Grays Harbor Terminals

I live "Up-Track" in Vancouver Washington and am a retired Professional Engineer with a 35 year career in the energy business.

The explosive powers of the various energy proposals at the Grays Harbor are very catastrophic to the local communities and also in many cases to all the communities "Up Track" from the Facilities.

The Atomic Bombs that were detonated on Hiroshima and Nagasaki Japan and ended World War II were between 15 and 21 Kilotons of TNT. The Proposals at Grays Harbor can be **as much as 81 times more powerful than these atomic bombs** using the Environmental Protection Agency – Risk Management Program RMP*COMP used to determine the risk to the neighborhoods surrounding an industrial facility.

Three factors were used to calculate the danger using this program that were not done to protect and all communities and neighborhoods from the dangers of crude oil in the DEIS.

Over Pressure—at 1 PSI that shatters glass at body piercing velocities

Vapor Cloud Ignition—from a small 4 inch Diameter Hole (12.56 Square Inch) from broken piping or a simple act of terrorism

Heat Release—Boiling Liquid Expanding Vapor Explosion (BLEVE) with heat causing 2nd degree burns

The worst case scenarios are if the entire Westway Crude Oil Facilities were on fire with five storage tanks at 200,000 barrels of storage each and total loss of 1,000,000 barrels of crude oil.
Over Pressure—Every window would be shattered up to 4.8 miles from the site and significantly more damage at the source including fatalities.

Vapor Cloud Ignition—A 4 inch hole has to be promptly isolated within a 10 minute period to control the exposures to a 0.1 mile radius. If the incident is not controlled quickly, it can easily escalate to an uncontrolled fire.

Heat Release (BLEVE) —at a radius of 8.4 miles from the source, the heat is so intense that second degree burns are expected at the perimeter and worse burns and fatalities closer to the source.

The results are enclosed in my attachment BRAKE – Energy Potential of Grays Harbor Project.xls

It is recommended that these calculations be verified and included in the Final Environmental Impact Statement to present the dangers of crude oil and its relationship to the neighborhoods and communities.

Response GP99-1

The term "explosion" used throughout the Draft EIS, and the assessment of the likelihood and consequences of explosion incidents, refer to boiling liquid, expanding vapor explosions (BLEVE), vapor cloud explosions (VCE), and other types of explosive events that could result from releases of crude oil. As discussed in Final EIS Section 4.5, not all spill events would result in a fire (ignition), and not all fire events would result in an explosion. The Draft EIS proposes mitigation that would reduce the potential for oil spills, fires and explosions, but, as noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident and environmental impacts could be

significant. The approach and methods for analyzing risk of train oil spills, fires, and explosions in the Final EIS is discussed in more detail in Appendix M, *Risk Assessment Technical Report,* the Master Response for Environmental Health and Safety Analysis, and the Master Response for Risk Assessment Methods.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Comment GP99-2

This is my final letter expressing my opposition to the proposed Westway and Imperium Terminals at Grays Harbor Washington and final comments are as follows:

Comment #1 - The Deputy Attorney General of the State of Washington (Essko) has commented on the PDEIS for the Tesoro Savage Crude Oil Terminal proposal and stated that the RULE OF REASON should be part of the DEIS. This RULE OF REASON is that all the engineering calculations and theory are meaningless if it doesn't make reasonable sense. To state that a potential metal component in an industrial facility has a failure rate of 20,000 years is not reasonable and common sense if that at best the component is good for 200 years if properly maintained. The RULE OF REASON should be applied to the Westway and Imperium Proposals for crude oil transfer at Grays Harbor.

Response GP99-2

Comment acknowledged.

Comment GP99-3

Comment #2 - The alternate proposals presented in the Grays Harbor DEIS are weak and do not adequately evaluate the pipeline alternative. The example that a crude oil rail car is 74,000 pounds of steel and there are over 50,000 crude oil rail cars in service in the US and Canada. If one rail car was melted down to make an 8 inch pipeline it is equal to 2,591 feet of pipe or one half mile. The 50,000 rail cars would be able to make close to 25,000 miles of 8 inch pipe and be a safer way of transporting the dangerous crude oil commodity. The cost is paid by the producers and not the taxpayers.

Response GP99-3

Refer to the Master Response for Project Objective and Alternatives for an explanation of the alternatives evaluated in the Draft EIS.

Comment GP99-4

Comment #3 - The Location of any crude oil terminal in an urban location is a disaster waiting to happen. It is not IF a disaster is going to happen, but WHEN. The Terminal needs to be located in a rural location that is 5 to 10 miles away from urban population centers. The American Institute of Chemical Engineers Facility Siting Guidelines is a basis to not only protect the employees working at a highly hazardous facility but it protects the neighborhood also by providing a safe distance. This has not been addressed in the DEIS.

Response GP99-4

Refer to the Master Response for Project Objective and Alternatives for an explanation of the alternatives evaluated in the Draft EIS.

Comment GP99-5

Comment #4 – Crude Oil is a raw upstream commodity with unpredictable chemical and physical properties totally different that the predictable world of refined petroleum products. When you pump gas at the gas station it is predictable on the product chemistry and physical properties. Crude oil can contain "Fracking Chemicals" that are not disclosed and classified as "Trade Secrets" that could be carcinogenic, radioactive, toxic, and dangerous in small quantities. When a new well is brought online, producers typically flush the chemicals out going directly into the crude oil tanks, pipelines, railroads and terminal facilities. The unknown Trade Secrets can kill humans at any location related to a release, spill, fire, explosion or BLEVE. This is not what I want for my community.

Response GP99-5

Comment acknowledged.

Comment GP99-6

Also, Crude Oil is allowed a 2.00 % Basic Sediment and Water (BS&W) and still be a marketable product.

Where does this 2.00 % Go – Into the bottoms of tanks to be drained off and go to disposal which could be a municipal wastewater treatment plant.

For the Westway Proposal 2.00 % equals 42,000 gallons per day of a mystery BS&W that needs handling.

For the Imperium Proposal 2.00 % equals 67,200 gallons per day of a mystery BS&W that needs handling.

It is concerning that as a private citizen, that I have been so actively involved in a project that is over 150 miles away from my home in Vancouver Washington because the DEIS for the Westway and Imperium failed to provide the basics needed to make an informed decision on these projects.

This is the 8th letter submitted as comments on the Westway and Imperium DEIS and the others are public record as The # 358, #401, #402, # 442, # 512, #552, and #561 and this one # ???.

Thank You for the Opportunity to make public comments on the Westway and Imperium DEIS.

We Can DO Better

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Response GP99-6

As noted in Draft EIS Chapter 3, Sections 3.3, *Water*, 3.13, *Public Services and Utilities*, and 3.14, *Hazardous Materials*, contaminated water, solid waste, and hazardous waste would be disposed of properly consistent with applicable regulations.

GP100, **Brake, William**

Comment GP100-1

FROM THE SEPA POLICY ACT HANDBOOK IN EIS IS THE FOLLOWING: 3.3. Purpose and Content of an EIS The primary purpose of an EIS is to provide an impartial discussion of significant environmental impacts, and reasonable alternatives and mitigation measures that avoid or minimize adverse environmental impacts. This environmental information is used by agency officials—in conjunction with applicable regulations and other relevant information—to make decisions to approve, condition, or deny the proposal. (See Using SEPA in Decision Making on page 73.) An EIS is not meant to be a huge, unwieldy document. The text of a typical EIS is intended to be only 30 to 50 pages. It is not to exceed 75 pages unless the proposal is of unusual scope or complexity, in which case it may not exceed 150 pages. The EIS should provide information that is readable and useful for the agencies, the applicant, and interested citizens. A readable document: • Is well organized; • Provides useful tools for the reader, such as a table of contents, glossary, index, references; • Is not overly technical (technical details necessary to support information and conclusions in the EIS should be included in appendices or incorporated by reference); and • Is brief and concise. A useful document: • Focuses on the most significant and vital information concerning the proposal, alternatives, and impacts; • Provides sufficient information about each alternative so that impacts can be compared between alternatives; and • Presents the lead agency's analysis and conclusions about the likely environmental impact of the proposal The Westway DEIS is 1,826 pages and the Imperium DEIS is 1,821 pages for a total of 3,647 pages is SIGNFICANTLY ABOVE THE REGULATORY GUIDELINE OF 150 PAGES. There is a fine line between what is too little and what is too much for a decision maker to make a decision, but in this case the documents are too long and too wordy to manage for the responding agencies, business, tribes, and public citizens. It is very difficult to read, understand, and respond to a DEIS in a short time period with the other priorities of life or business. If it is one project, a long DEIS is acceptable, however it is anticipated that close to 20 fossil fuel proposals are anticipated to get products to the Pacific Northwest Coastal Cities for transport on rivers and the Pacific Ocean to world markets. The Tesoro Savage (Vancouver Energy) Crude Oil Terminal DEIS has recently been released and is 4,556 pages. Thank You for allowing the public to comment on the Westway and Imperium DEIS.

Response GP100-1

The length of the Draft EIS reflects the amount and complexity of information deemed adequate for the full disclosure of impacts. Due to the size, other materials such as the *Summary* and fact sheets were prepared to convey impacts in a more condensed format. See response to previous comment regarding printed copies.

GP101, **Branshaw, Jon**

Comment GP101-1

Good evening. My name is Jon Branshaw, a lifelong resident of Grays Harbor and commercial fisherman from Westport, Washington. The proposed Westway and Imperium crude oil terminals that are in the planning and development phase for Grays Harbor is the biggest mistake the county can make.

I get it. We need jobs here, but the few hundred jobs these projects will provide are far outweighed by the economic disaster in the event of one oil tanker crashing on the south jetty.

Trust me, folks, I've been through one oil spill already. Anybody who remembers the EXXON VALDEZ in 1989. I was resident of Cordova, Alaska when that happened. Exxon said they will clean it up. But you can still dig down a foot on the affected beaches and find oil, almost 30 years later.

As a commercial fisherman I have a viable opinion on this project. But everybody loses in the event of a spill. Westway fails to mention of the 17 train loads of crude that will pass through the harbor each week. You think Walmart is tough now, just wait. There will be over 400 bar crossings, tankers crossing across the Grays Harbor bar every year. I urge all concerned harborites to oppose this project.

Thank you.

Response GP101-1

Comment acknowledged.

GP102, **Brantner, Maren**

Comment GP102-1

The Washington State Audubon society brought to my attention the negative impacts of the proposed oil terminals in an important bird area. To quote the WA State Audubon, "Proposed oil terminals in Grays Harbor estuary would endanger critical habitat for a host of migrating and resident bird species, including Red Knots and Marbled Murrelets. Grays Harbor is a site of hemispheric importance for shorebirds and supports six Important Bird Areas and a national wildlife refuge. The majority of the Pacific coast population of Red Knots congregates in the mudflats of Grays Harbor each spring to fatten up before heading on to breeding grounds in the Arctic. That means a significant portion of the population could be wiped out with a single accident or spill." I understand the need to balance development with environmental concerns, however, the risks of these alternatives seem to far outweigh any possible benefits. I am opposed to any alternative that increases the risk of damage and harm to the environment or bird habitats.

Response GP102-1

Comment acknowledged.

GP103, **Bray, Karen**

Comment GP103-1

Karen Bray
Earth Ministry
Olympia, WA 98206

I appreciate the effort being done to assess all the impacts that surround these expansion projects—Nothing has been noted however concerning the impact on our planet of burning 5 more million gallons of fossil fuels somewhere in the world. We need to address the global climate change Imperium should stay with just producing biodiesel and Westway with methane transport.

Response GP103-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively. Section 6.5.1.2 acknowledges that greenhouse gas emissions contribute to climate change and describes the projected impacts of climate change in the Pacific Northwest.

GP104, **Breuer, Sandra**

Comment GP104-1

I am opposed to crude oil facilities at Gray's Harbor

Response GP104-1

Comment acknowledged.

GP105, **Broadus, Jerry**

Comment GP105-1

I am a volunteer at Grays Harbor National Wildlife Refuge, where I perform shorebird censuses during migration. Even the relatively small portion of Grays Harbor known as Bowerman Basin performs an essential feeding role for migrating shorebirds. The remainder of Grays Harbor, especially along the north shore and at Bottle Beach, is the most important feeding area for shorebirds on their northerly migration along the Pacific Coast of the Northwest. I have helped with studies of blood lipid changes as shorebirds migrate. In a nutshell, if a shorebird on migration cannot stop at one of its feeding points along route, it will almost certainly never make it to the next stop. No bay on the Washington Coast is more important from this standpoint than Grays Harbor. All of the Pacific Coast race of Red Knots use Grays Harbor as a staging and feeding area during migration. They are declining already. Any large oil spill in impacting the north shore of the Harbor will impact this migration, and could easily drive this subspecies to extinction. There is no way to predict where or when an oil spill could occur. Even if a spill that reaches a shorebird feeding is cleaned up, it would have a long term serious and probably destructive effect on these areas. This could completely eliminate many vulnerable west coast populations of shorebirds. The DEIS

"technical fact sheet" for Environmental Health and Safety lists the likelihood of spill incidents from vessel collision, harbor entrance collision, and grounding-- using the "sliding scale" illustration--as closer to "likely" than "unlikely" for the first two and midway between "likely" and "unlikely" for the third. Risk from all three incident possibilities are severe. When added to the proposed size of the vessels, the amount of oil proposed to be carried, the narrowness of the Grays Harbor shipping channel, the strong currents in the Harbor, and the treacherous Bar conditions at the entrance--these risks are simply too high and potentially too devastating to allow. The only meaningful mitigation listed is the requirement of the use of tugs. That is not enough. The risk and the potential consequences should completely disallow permitting for this project.

Response GP105-1

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed in the Final EIS.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or within Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including potential consequences to marine plants and animals and to sensitive areas including the Grays Harbor Shoreline and Grays Harbor National Wildlife Refuge (Bowerman Basin).

GP106, **Brockway, Abby (Rising Tide and Earth Ministry)**

Comment GP106-1

My name is Abby Brockway, and I'm with Rising Tide and Earth Ministry. I've partnered with Backbone Campaign 350, Seattle, Greater Church Council of Seattle, many organizations because we cannot do this alone. Washington state and actually North America is under attack from the fossil fuel industry.

I've attended every hearing I can. I'm a mother, I'm a business owner, and I believe that we have a small window to make change. I will submit my technical comments about how you can find the information you need to reject this proposal because there's been many arguments that have been said. But it comes down to the survival of our planet.

James Hanson just released a new ice melt paper, and our pathway to a safe and stable economy and environment. The window is closing. By 2013 we should have been at six percent reduction in carbon in the world.

We have got to be done with coal by 2030 and done with fossil fuels at 2050. And this makes absolutely no sense to drench these communities in fossil fuel. We are moving the wrong way, and I believe our backs are up against the wall.

And if these approvals get approved, I believe civil disobedience is my only option. And I can ensure you that everyone standing behind me is feeling the same way.

And I'm telling you now, I will go to jail. I'm fine to pay the price for our future generations. I am here and I mean it. I want you to see my face and my seriousness of how dire the situation is.

Thank you.

Response GP106-1

Comment acknowledged.

GP107, **Brooke, Phillip**

Comment GP107-1

Dear EIS Administrators: The Draft EIS for both the Westway and Imperium crude oil terminals in no way adequately addressed the areas of concern I detailed in my original written scoping comments. Where topics were addressed by name, the DEIS response was weak to non-existent. In the rare instance where the DEIS did respond to a topic, it was concerned with merely the parcels where the crude oil tank farms would sit, or the immediate area of the terminal, not the rail corridors. Where prevention and precaution was requested, the DEIS was focused on what would happen only after an incident. I have attached a copy of my original scoping comments for reference. Specifically, the Draft EIS did not address or inadequately addressed the following areas requesting consideration in my original scoping comments:

1. Bisecting our Communities, Accident Rates and Track Trespassings.

2. Cumulative Impacts to Historic Preservation, Historic Districts and Historic Architecture

3. Aging Infrastructure vis-à-vis Size and Weight of Crude Oil Trains.

4. Corrosiveness Impacts to Tanker Car Components and Railroad Tracks.

5. Hazardous Material Mislabeling (blind spot in federal law).

6. Schools and Vulnerable Populations.

7. Inadequate and Unsafe Existing and Re-designed Tanker Cars (blind spot in federal law).

8. Residential Neighborhoods Along Rail Corridors.

9. Lack of Tanker Car and Train Weigh-Ins (blind spot in federal law).

10. Elevated and Tunnel Track Systems.

11. Non-Accidental “Routine” Releases/Chemical Hazards.

12. Impacts of Sub-contracting and Lack of Joint Liability.

13. Bakken Crude Oil Pressures vs. Conventional Crude Oil (blind spot in federal law).

14. Hazard Communication, SDS, Benzene, Hydrogen Sulfide and (other) Carcinogens.

15. Accidents vs. Health Impacts of Long Term Exposures (10-fold Rule).

16. Crossing Times, Emergency Response and Economic Loss.

17. Vehicle Traffic Impacts (direct and indirect economic losses).

18. Limits to Future Size of Export Terminals and Foreign Oil Export.

19. Loss of Property Values and 'Takings'.

20. Risk to First Responders, Fire, EMS and Law Enforcement.

21. Emergency Response Plans.

22. Unsafe Rail Cars-Existing, Retrofitted and New.

23. Liability Insurance and Financial Responsibility.

24. Violating Permits and Inadequate Penalties.

Cumulative impacts of ALL fossil fuel rail terminal and refinery proposals currently under consideration, not just in Washington State, but those passing through Washington State (such as coal trains bound for the British Columbia Coal Export Terminal) must be considered in their fullness to understand the cumulative impacts to local communities and existing infrastructure around Washington State. I ask you to re-visit these topics in your Final EIS in order to adequately address the interests of those who live, work and recreate in so-called Pass-Through Communities around Washington State. On behalf of those impacted negatively by these proposed projects, I thank you for your thoughtful consideration of these critically important areas to us. Respectfully submitted, Phil Brooke, Centralia, WA Mailing address: PO Box 294 Wilkeson, WA 98396 253.531.3353 oldbrickhousefarm@yahoo.com

Grays Harbor Crude Oil Export Terminal Public Scoping Comment—Submitted September 23, 2014

Dear EIS Administrators:

Moratorium & the Precautionary Principle: This terminal approval process should not be allowed to advance until the absolute full impacts are known and impacted communities, as well as the natural environment are fully protected. The burden of proof and the entire expense should fall squarely upon those proposing these Bakken crude oil export terminals and not the U.S. Taxpayer. **For this & the below reasons, I & many others call on Governor Jay Inslee to call an immediate, retroactive & comprehensive moratorium on crude-by-rail export terminal schemes in Washington State**.

I'm a resident of Centralia, business owner in Winlock, farmer & am the director of risk management for a large employer by profession. Our whole family loves trains. I have family members who put in careers with Burlington Northern & I'm routinely interrupted by my 3 year old nephew, who wants to be lifted up to the window to see which train is passing by. Indeed, trains are one of the most environmentally sound methods to transport goods and people. But these proposals to transport extremely flammable Bakken crude oil in what rail industry officials are calling unsafe soda cans threatens this soundness & is simply put, a disaster waiting for all of us. As part of my scoping comments, I'm will also submitting separately the petition signatures of 450 of my neighbors & friends in opposition to these projects.

Response GP107-1

Refer to responses to detailed comments below.

Comment GP107-2

Bisecting our Communities, Accident Rates & Trespassings: Just in Lewis County, this crude oil will bi-sect & damage our 4 largest cities: Centralia, Chehalis, Napavine & Winlock. Centralia & Chehalis alone have 64 crossings between them. We know Lewis County has among the highest incidences of track trespassing in the State. Just because an oil executive says safety is their highest priority, does not mean Bakken crude oil can be shipped via railroad safely. It is not & cannot. The Manhattan Institute, a conservative pro-business think tank reports that crude oil rail accidents occur 34 times more frequently than pipeline accidents for every barrel of crude shipped comparable distances. We're seeing this play out in the news & have seen in the last year more crude oil train accidents than the last 4 decades combined.

Response GP107-2

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, addresses potential impacts on vehicle delay, emergency vehicle access, and safety in the study area from routine rail operations related to the proposed action. Final EIS Chapter 3, Section 3.16.8, *Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?* clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Chapter 5 acknowledges that routine transport in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and*

Mitigation. Final EIS Chapter 5 further describes the potential risks associated with rail transport in this area.

Comment GP107-3

Cumulative Impacts to Historic Preservation, Historic Districts & Historic Architecture: I am deeply involved in historic preservation in my personal life & have served for years on Historic Preservation Commissions. Much of Washington State's (& the nation's) historic architecture & built environment exists along railroad corridors, which are proposed to host crude oil trains. Sometimes the railroad came before the historic architecture & sometimes the railroad was built after. Indeed, when these trains bisect both small & large communities, it's usually in the historic areas. Both the Lynchburg, VA & Lac Megantic, Quebec disasters serve as poignant examples of this. These derailments & gigantic explosions occurred in the heart of historic districts. The nature of these historic areas & the condition of historic architecture will change fundamentally with the inundation of dangerous mile & a half long explosive trains, turning many areas into high risk rail yards prone to derailments even when the trains are not moving or moving at a very slow speed, as is common for derailments. Cumulative impacts from all crude oil trains must be studied on different levels:

- Immediate impacts to historic districts or those areas eligible for historic status will occur due to:
  - Derailments & other accidents/incidents.
  - Decline in business, as business interruptions occur due to blocked intersections, crossing times, noise, fumes & both real & perceived danger.
  - Higher crime, as areas parallel to railroad tracks carrying highly explosive crude oil will be reduced to all rental properties. Crime will increase. Neighborhood disintegration will occur.
  - Decline in local tax revenue to the city, county & state when properties lose value. Data already exists on decline of property values. this sub-topic, which should be accessed.
- Long-term impacts to historic buildings & properties, as property values decline as businesses & residents abandon historic areas & properties in light of the high risk posed with explosive trains. Ongoing maintenance & capital improvements will be neglected. I can tell you as a risk manager, vacant properties are at a significantly higher risk of fire, theft & water damage.

Cumulative negative impacts to historic preservation must be considered, understood & mitigated in the scoping. Our State's cultural heritage is dependent upon preservation of these many areas.

Response GP107-3

Draft EIS Chapter 3, Section 3.11, *Historic and Cultural Preservation*, describes the archaeological resources, historic resources, and culturally significant properties in the study area and identifies potential impacts from routine rail operations. Chapter 4, Section 4.7, *Impacts on Resources*, describes potential impacts on these resources from oil spills, fires, and explosions. Chapter 6, *Cumulative Impacts*, describes potential impacts on these resources from routine operations and risks of oil spills, fires, and explosions under cumulative conditions. Potential impacts on property values are addressed in Section 7.3, *Cost-Benefit Analysis.*

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP107-4

Aging Infrastructure vis-à-vis Size & Weight of Crude Oil Trains: The crude oil trains proposed will be up to 1.5 miles or 125 cars long, & as a result harder to control or stop, increasing the risk of something going wrong. Our area's rapidly aging rail and bridge infrastructure, much of it built on often saturated flood plains, has not been sufficiently assessed for suitability to this intensity of cargo with each & every tanker weighing up to 143 tons & the 4-5 locomotives weighing 190 tons each. We have seen 3 derailments in the Centralia to Grays Harbor line in the last 3 weeks for grain trains running at 10 mph, 6, mph & one at a complete stop. Slowing these crude oil trains is not going to prevent their derailment, as is suggested by Federal authorities. Ironically, Genesee & Wyoming propose to double the speeds on the Centralia to Grays Harbor line. Will scoping be conducting these infrastructure assessments to the satisfaction of local governments?

Response GP107-4

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP107-5

Corrosiveness Impacts: The corrosive nature of fracking liquids & materials in Bakken crude oil is well-known to cause premature corrosion to tanker cars; the interiors, fittings, hatch covers, valves & even the railroad tracks themselves (although Coal trains are surely helping). Your scoping must consider this as it relates directly back to human safety.

Hazardous material mislabeling: Scoping must consider the mislabeling & mischaracterizing of highly flammable crude oil under re-classification rules related to 'understood', but not 'actual' flash points.

Response GP107-5

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action that could occur as the result of various causal events. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Refer to the Master Response for Risk Assessment Methods for a discussion about the assumptions, data sources, and methods used in the assessment of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*.

Draft EIS Chapter 4, Section 4.5.3, proposes a mitigation measure to address concerns about the potential for mislabeled or mischaracterized crude oil. Specifically, the measure indicates that to improve the safe transport of crude oils with different volatilities and sinking tendencies, the applicant will not accept crude oil by rail unless the following actions have occurred.

- The applicant has received verification that a sample of the oil has been tested and properly classified and characterized.
- Where classification and characteristics of the oil are available in advance, the applicant has fully described this information and the implications for emergency response in its oil spill contingency plan.

Refer to the Master Response for Mitigation Framework.

Comment GP107-6

Schools & Vulnerable Populations: Scoping must consider all educational, child care, healthcare, vulnerable adult & critical infrastructure facilities within proximity of the radius of hazardous crude-by-rail trains. For example, in Winlock, WA, the Elementary School is just feet from the tracks.

Response GP107-6

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP107-7

Inadequate & Unsafe Tanker Cars: Scoping must consider the well-known safety issues for DOT-111's, retro-fitted DOT-111's, and newer DOT-123's. They must consider the need for pressurized tanker cars for this explosive material. It's a flammable gas, so pressurized cars only make sense. Bakken crude oil should be required to be transported and stored only in a safe manner, which does not cause 'imminent' threat as it does now to those living within radius of railroad tracks from North Dakota to their in-state destination. Roughly 5,000 of the worst DOT-111's were just made illegal in Canada. The rest will soon be illegal in Canada. Those are now likely to comprise the core of the crude oil tanker fleet in the United States, increasing the risk to all of us. This is considered a new weak spot in crude-by-rail safety.

Response GP107-7

Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and the retrofitting of all existing tank cars in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643). However, as noted in Section 4.5.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport*? the risks cannot be completely eliminated.

Comment GP107-8

Residential Neighborhoods: Scoping must consider the more conspicuous proximity of residential neighborhoods to the railroad tracks in smaller cities vs. cities like Lynchburg, VA, where urban growth has pushed residential areas out from the track radius (although higher density development is not occurring near tracks in urban areas). For example, the same derailment & explosion as the Lynchburg, VA derailment on 4/30 in a place like Centralia or Winlock, WA would have undoubtedly led to significant loss of life & property.

Response GP107-8

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the potential impacts that could occur as the result of an oil spill, fire, or explosion, including potential impacts on humans.

Comment GP107-9

Lack of Weigh-Ins: Due to the length of unit trains carrying crude oil, they do not typically pass through weigh-in stations, so no one is tracking their weights. As a result, overweight cars will not be identified, much less tracked, creating more unnecessary imminent danger for communities. This is considered a blind spot in federal law.

Response GP107-9

As noted above, PS&P is required to adhere to all applicable regulatory requirements intended to ensure the safe passage of rail freight. Nonetheless, implementation of the measures described in Section 3.15.6, *What required permits and plans apply to rail traffic?* and Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident.

Comment GP107-10

Elevated & Tunnel Track Systems: The City of Spokane & many other areas have built their railroad lines on elevated tracks. Many others like Seattle have tunnels. Spokane has had cars fall from these tracks before. Scoping must study the result of highly flammable tanker cars being dropped from up to 80 feet elevations onto population centers.

- How does this enhance the explosion, resulting fires, scope/intensity of fire/explosion, loss of life, property damage & structural integrity of elevated areas?
- Will the entire train come down & explode when a crude oil tanker bomb goes off destroying the tracks?
- How would a tunnel or elevated accident decommission main lines for ALL train traffic, most especially local Washington State products?

Response GP107-10

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

Comment GP107-11

Non-Accidental "routine" Releases/Chemical Hazards: Impacts from non-accidental releases of crude oil & VOC's must be scoped, quantified & understood. Hazardous materials testing studies must be considered for Bakken crude oil, to include all carcinogens, health hazards & fracking liquids not characterized in placards & safety data sheets. Trains WILL emit tons of VOC's annually into neighborhoods full of children & residents. For comparison, a small 2-aisle gas station emits 5-10 tons of VOC's annually just from people pumping gasoline. Using the precautionary principle, VOC emissions must absolutely be quantified & studied for these non-pressurized tanker cars. Due to oil & gas industry exemptions from Clean Air & Water laws, protections are non-existent.

Response GP107-11

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources. Draft EIS Chapter 3, Section 3.2, *Air*, presents emissions estimates of criteria and toxic air pollutants from onsite operations. Considering background concentrations, onsite emissions of criteria pollutants would not cause an exceedance of national ambient air quality standards. Emissions of toxic air pollutants related from onsite stationary sources would be below the state thresholds identified in WAC 173-460-150. As described in Draft EIS Section 3.2, these emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Rail and vessel operators are required to adhere to all applicable regulatory requirements intended to ensure the safe passage of freight.

Comment GP107-12

Impacts of Sub-contracting: Will railroads, shippers, oil companies and tank car companies all be made **jointly liable** for accidents, health damage & spills, rather than simply sub-contracting away the most dangerous parts of crude-by-rail to 3rd party haulers, (LLC's without assets & very little insurance) who indemnify the parties above them? What other "disincentives" to safety, monitoring & maintaining safe operations exist within these business relationships? Sub-contracting the most high risk activities in an industry to a 3rd party is standard risk management practice across all industries & all governments. The effects of this should be scoped.

Response GP107-12

PS&P is required to adhere to all applicable regulatory requirements intended to ensure the safe passage of rail freight.

Comment GP107-13

Bakken Crude Oil Pressures: Scoping must include pressure tests for Bakken crude oil, which carries a relative pressure 3 times that of conventional crude oil. This is considered a blind spot in federal law.

Response GP107-13

The proposed facility would comply with the regulations described in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*. PS&P is required to adhere to all applicable regulatory requirements

intended to ensure the safe passage of rail freight. Final EIS Chapter 4, Sections 4.4.3, 4.5.3, and 4.6.3 identify additional mitigation measures to reduce risk.

Comment GP107-14

Hazard Communication/SDS-Hydrogen Sulfide & Carcinogens: I'm looking at the safety data sheet (SDS) for Bakken Crude & note this is nowhere near our grandfather's crude oil. It carries an NFPA flammability rating of 4, which is considered highly flammable & higher than that of gasoline, with a flash point of a hot day in July, as reported in the Lewis County Chronicle. It should be nowhere near barbeques, smoking, sparks or even static electricity. This oil also contains a baker's dozen of known or suspected carcinogens, such as benzene, hexane, ethylbenzene & xylene with a topping of fine particulates from the 4 to 5 locomotives required to pull these mile long loads. Benzene isn't a suspected carcinogen. It's known to cause leukemia in children. This isn't under debate. Incidentally, they're finding much higher levels of benzene in this stuff than was previously understood (up to 10 times higher), but it should be noted that according to current MSDS sheets, this crude already contains 10 times the legally allowed dose for an 8 hour shift. There are 12 other cancer-causing chemicals in Bakken Crude Oil. We know these tanker cars will vent & leak tons of pollutants into our neighborhoods annually. They have to vent, or they will explode. Thermal imaging cameras are documenting emissions locally. Federal officials in the Midwest are threatening to close down crude oil on-loading operations until lethal levels of hydrogen sulfide are brought under control. Oderless, hydrogen sulfide can simply kill you in high enough concentrations. It's heavier than air, so it will settle into the low points of our neighborhoods. Lewis County's flood plains have quite a few low points—especially in our cities.

Response GP107-14

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources.

Draft EIS Appendix D, *Air Data*, Table 5, reports onsite emissions of criteria and air toxic pollutants, including fugitive emissions during filling and draining and from storage tank valves and flanges, and emissions from annual storage tank cleaning, operation of the marine vapor control system during vessel loading, and onsite rail operations and vessel hoteling. Final EIS Table 5 reflects updated stationary source emission estimates based on the applicant's revised Notice of Construction application to the Olympic Region Clean Air Agency (ORCAA), which reflects requested ORCAA revisions to apply a more conservative crude oil Reid Vapor Pressure based on review of recently published Bakken crude oil data. Final EIS Table 7 reflects updated emission estimates for rail transport based on revised assumptions for rail operations (types and number of locomotives), based on information received from PS&P.

As noted in Draft EIS Chapter 3, Section 3.2, *Air*, prior to operation, the applicant will be required to obtain a permit from ORCAA, which limits the amount of emissions allowed by the applicant to safe levels.

Comment GP107-15

Accidents vs. Long Term Exposure: We know that in the American workplace, there are roughly 5,000 fatalities each year due to accidents, but more than ten times that number of deaths due to long term exposure to chemicals and other persistent health hazards. Our Children will be exposed

to these health hazards simply by playing in their back yards. Yet, they won't have the benefit of protective equipment, medical surveillance, occupational safety programs or workers' compensation like the employees working just on the other side of their fences. Will lead agencies be considering long term health effects of exposure to residents in Washington's pass through communities & what it will cost to provide personal protection, medical surveillance, & healthcare to residents experiencing persistent exposure?

Response GP107-15

Refer to the Master Response for Purpose and Focus of the EIS.

Comment GP107-16

Crossing Times, Emergency Response & Economic Loss: I want to thank Bill Schulte, Lewis County Commissioner & those involved in getting Lewis County & Chehalis a 3-year option on the Tacoma line. This keeps at least one pawn out of G&W's hands. But even with its purchase, crossing times will increase exponentially. I've seen cumulative impacts up to 12 hours a day in other traffic studies.

What we know are these mile & a half long trains will be managing a 90 degree turn in Centralia, then running at less than 5 miles per hour through our commercial & residential neighborhoods. Will traffic studies be conducted for ALL pass through communities in the State. Not just Centralia & Chehalis, to determine how much time crossings will be increased & perhaps more importantly, how this will impact emergency response services & local businesses?

Response GP107-16

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*, which presents a detailed analysis of potential impacts on vehicle traffic delay in the study area related to the proposed action.

Comment GP107-17

Vehicle Traffic Impacts: The direct and indirect economic and traffic impacts of traditional train cargo being forced to use roads and highways, because railroad routes are overwhelmed by crude oil trains should be carefully examined at all levels. Road may be inundated by cargo traditionally transported by train, exacerbating already difficult traffic backups & prematurely aging vehicle roads & bridges. This examination should include the impacts to the competitiveness of Northwest & American businesses, when these businesses are forced to utilize more costly transport methods when railroads become unavailable.

Response GP107-17

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, addresses potential impacts on vehicle delay and emergency vehicle access. The Final EIS section clarifies proposed mitigation and

potential significant and unavoidable impacts. Refer to the Master Response for the Purpose and Focus of the EIS.

Comment GP107-18

Limits to Future Size & Foreign Export: These proposals do not limit the size of their future operations. Concurrently with these proposals, they are pursuing dredging permits with the Army Corps, so they can bring super-tankers into Grays Harbor, making it the cheapest & most convenient deep water port in the lower 48 for export to places like China. The Army Corps in response is expressing profound skepticism to the terminal developer claims that oil export terminals will only be used for domestic refineries, instead of creating high paid refinery jobs in places like China. Nothing about these proposals is about energy independence. In fact, it's a fact spoken openly about in energy industry journals.

Response GP107-18

The proposed action does not include dredging. Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment GP107-19

Loss of Property Values: Studies show property values will fall anywhere from 5 to 20% depending on where you live in relationship to these oil trains. Will home & business owners be reimbursed for the loss or "taking" of their property values? Will these companies buy homes & property from residents at pre-damage value?

Response GP107-19

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

Comment GP107-20

First Responders: Locally, we're cutting back on fire fighters & first responders. This is hardly a time to do something like this. When the train derailed in Quebec, causing so much death & destruction, residents had between 3 to 5 seconds to evacuate. From what I have read, many victims were simply vaporized when making the decision to walk outside their doors to escape. Will pass-through communities be provided with resources to plan evacuation routes & install early warning systems?

Emergency Response Plans: Washington State admits it does not have a plan or resources to adequately respond to a crude oil derailment & explosion. This should be considered in the scoping.

Response GP107-20

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP107-21

Unsafe Rail Cars-Existing, Retrofitted & New: The Railroad Industry testified last week that not only are the DOT 111 cars unsafe for the transport of this highly flammable crude oil, but the new & retrofitted cars are no better. Carriers are finding the heat and vibrations associated with the train trip is actually causing the refining process to begin in these tanker cars, making the oil even more prone to ignition when it reaches our doorstep. Just like a can of soda in your backpack, or perhaps more appropriately, a meth lab. Railroad officials are recommending pressurized tanker cars be used, which makes sense. It's a flammable gas. Canada just voted to phase out DOT 111's. The railroads are telling the oil companies they need to build pressurized cars with thicker walls and electronic brakes. The oil companies are blaming accidents on unsafe railroad tracks and lax safety. The need for re-designed cars, thicker walls, electronic brakes, unsafe tracks & elimination of lax safety should all be scoped.

Response GP107-21

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*, presents the analysis of risk of oil spills, fires, and explosions during rail transport related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident along the PS&P rail line.

Comment GP107-22

Liability Insurance & Financial Responsibility: Crude oil carriers typically can only buy $25 million in railroad liability, which is a drop in the bucket compared to the potential for loss. Damages in the Lac Megantic disaster are approaching a combined $5 billion dollars. As a taxpayer, I oppose paying for rail improvements oil companies should be funding (such as the Tiger grant), but I really oppose paying for their negligence, especially when most carriers are limited liability corporations using leased tanker cars. Are lead agencies ensuring these developers & their carriers have the financial resources to take financial responsibility for their actions, which I understand is a requirement of state law?

Response GP107-22

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP107-23

Violating Permits/Inadequate Penalties: Our existing local export terminal, Global Partners, which is operating out of Clakskanie, Oregon was just caught violating the terms of their permit exporting six (6) times their legally permitted crude oil amounts. Incidentally, they ship from a former bio-fuel

terminal paid for by taxpayers. In 2012, they paid $1.6 million dollars in federal taxes on revenue of over $17 billion. That's a tax rate of less than 1%. They paid a $117,000 fine for violating their permit, which amounted to a mere penny per barrel. Breaking the law is quickly becoming the cheapest way to conduct business for these companies.

Response GP107-23

Refer to the Master Response for Purpose and Focus of the EIS.

Comment GP107-24

Conclusion: ALL negative cumulative impacts of ALL fossil fuel rail terminal & refinery proposals currently under consideration, not just in Washington State, but those passing through Washington State (such as coal trains bound for the British Columbia Coal Export Terminal) must be considered in their cumulative fullness to understand the cumulative impacts to local communities & existing infrastructure around Washington State.

In closing, Robert Kennedy famously cautioned us not to excuse those willing to build their lives on the shattered dreams of others. In the case of crude-by-rail export terminals, we should not. Too much is at stake for our local communities. I love Lewis County & many communities around this area. I care deeply for many people who will have their lives & livelihoods directly impacted by these terribly dangerous crude-by-rail proposals. **These proposals do absolutely nothing but damage to our communities.**

Thank you in advance for your thoughtful consideration of all of the above scoping requests.

Respectfully submitted,

Phil Brooke,
Centralia, WA

Mailing address:
PO Box 294
Wilkeson, WA 98396
253.531.3353
oldbrickhousefarm@yahoo.com

Response GP107-24

Comment acknowledged.

GP108, **Brosman, Wes**

Comment GP108-1

Thank you for this opportunity to speak to you. My name is Wes Brosman. I live in Aberdeen, Washington. I moved here 15 years ago for health reasons related to asthma and allergies.

It was the clean air of Grays Harbor that brought me here. But if these projects are allowed to move forward, it would mean a shorter life span for me or I will have to move.

These projects are proposed for locations -- some for directly across the river from me and about three miles as the crow flies directly within the path of prevailing winds. Leisure Manor is where I live, along with 200 other senior citizens, and we would be downwind and most of us would not hear the warning sirens even though one is located nearby.

Even a minor spill during these projects would result in negative effects for us. And even if we could hear the warning, many of our residents are unable to evacuate in a timely manner. The rail line is less than two miles from our home and that rail line uses mostly 100-year-old construction materials that force the trains to travel no more than five miles per hour.

The tracks utilize wooden ties and old spikes without the placement of steel bases on sectional rail segments. No other rail system uses the antiquated and dangerous construction materials we see here.

I want to know how the residents will be notified in the event of a fire. Will the residents be compensated for loss of home value? Will the rail line be brought up to modern standards? How will the rail line be protected against earth movements? And how will elderly residents reach the hospital if the streets are blocked?

These problems cannot be mitigated and the permits should be denied

Response GP108-1

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP109, **Brosman, Wes**

Comment GP109-1

Westway and lmperium Terminal Services Expansion Projects EIS.

My name is Wes Brosman and I live in Leisure Manor Mobile Home Park, Aberdeen, Washington. I moved here 15 years ago for health reasons related to asthma and allergies. It was the clean air of the Grays Harbor area that brought me here, but if the above projects are allowed to go forward my health will likely cause me to either move away or face a much shortened life span. These projects are proposed for a location that is almost directly across the river from Leisure Manor, about three miles as the crow flies, and directly in the path of prevailing winds.

Leisure Manor is where I live along with more than 200 other senior citizens. We will be downwind from these dangerous projects and most of us cannot hear the warning sirens even though one is located nearby. Even a minor spill near these projects could result in negative health effects for us. And even if we could hear the warning, many of our residents are physically unable to evacuate in a timely manner.

The rail line to serve these projects is less than two miles from our homes. That rail line uses mostly 100 year old construction techniques that force the trains to travel no more than 5 miles per hour. The tracks utilize old wooden ties and old style spikes often without the use of placement steel base retainers on sectional rail segments. No modern rail system uses such antiquated and dangerous methods of railroad construction. Continuous rails with concrete ties have been standard in Europe for over thirty years. And even if the rail line were modernized, it must pass through areas of geological instability that have resulted in numerous landslides. On-going earth movement is currently threatening the rail line near the Lakeside Industries yard within Aberdeen City limits.

1. How will residents of Leisure Manor be notified and/or evacuated in the event of a spill, fire or the release of airborne suspended particles?

Response GP109-1

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP109-2

2. Will residents be compensated for loss of home values due to proximity to these projects?

Response GP109-2

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

Comment GP109-3

3. Will the rail line be brought up to modern standards?

Response GP109-3

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP109-4

4. How will the rail line be protected against earth movement?

Response GP109-4

Refer to Section 3.1, *Earth*, and the above response regarding ongoing inspections of the PS&P rail line.

Comment GP109-5

5. How will our elderly residents south of the river be able to reach the hospital if the streets are blocked by oil trains.

Response GP109-5

At-grade crossings would be blocked during the passage of trains going to or coming from the project site. Refer to Chapter 3, Section 3.15, *Rail Traffic*, for the estimated time a train would occupy at-grade crossings. Refer to Section 3.16, *Vehicle Traffic*, for the vehicle delay impacts related to the passing of these trains.

Comment GP109-6

I contend that these problems cannot be mitigated and permits for the projects should be denied. Please favor me with a written reply. Wes Brosman, 21 Meander Way, Aberdeen WA, 98520

Response GP109-6

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP110, **Brown, Keith and Teresa Robbins**

Comment GP110-1

In reviewing the Draft Environmental Statement on the impact of an Oil Spill and Fire along the rail lines numberous times in the document (section 4.7 and section 5) it is stated that: " ... no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, fire, or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion." This serious and unavoidable negative adverse impact needs to be further studied as to the unique impact it would have in the West End of Skamania County. My wife and I live in Skamania County in the heart of the incredible Columbia River Gorge and its National Scenic Area, rated #6 in the world for sustainable beauty destinations by National Geographic Traveler. The EIS must take into account the impact of the oil trains during transport through this exceptional area. It needs to include the likelihood of increased fires as a direct result of derailment (possibly exacerbated by coal deposits along the tracks loosening the rails) and additional train traffic. As former volunteer firefighters and a former fire commissioner during the past 12 years, we have fought first-hand, fires ignited by rail traffic in the Cape Horn region of the National Scenic Area. On a dry day with high east or west winds that frequent this area, a fire could easily sweep out of control and up the slopes of Cape Horn and into the tree canopy – destroying homes, lives, and wildlife habitat. We were distressed to see that the assessment of fire danger did not address the specifics of our area. On July 9th, 2015 Fire District no.4 passed a resolution (attached) calling upon our congressional representatives to work with federal agencies to STOP the rail transport of the highly flammable and volatile Bakken crude oil through Skamania County and the gorge at large…until railroad companies demonstrate the capacity to suppress the all–too-frequent devastating oil fires. Current practice is simply to let them burn themselves out, which represents a "clear life and safety danger to the residents". A fire of this size, type and duration in the West End of Skamania County would be nothing short of devastating. The fire dangers and ability of gorge local volunteer community fire departments to adequately respond must be documented as part of this EIS. There are numerous homes in the West End of Skamania County that will be totally cut off from Emergency Response services as the mile and a half long oil trains travel through on an all too frequent basis. As former EMT's, we know this 15 to 20 minute delay for each train can literally be the difference between life and death. We have been intricately involved in developing the Cape Horn Trail and Recreation area for the past 10 years.

This excessive train traffic will dramatically increase noise, the likelihood of a train derailment (due to build-up of coal on the tracks), and could result in significant crude oil spills and toxic degradation to what has been a pristine and treasured environment and experience. More fully investigate, as part of this EIS, the contamination that will certainly result from crude oil washing into the Columbia River, its tributaries and its many wildlife refuges. Do not allow this scenic treasure and sensitive wildlife to be destroyed.

Skamania county's economic health and future depends heavily on the draw this area has for tourists because of the National Scenic Area and the recreational opportunities that exist here. For example, 72% of all retail sales in Skamania County come from tourists. The additional oil trains will cut Stevenson off from their waterfront area, discouraging tourists, the docking of passenger ships and the holding of special events. The negative economic impact on and potential loss of jobs within gorge communities must be more fully articulated in the EIS. Keith Brown and Teresa Robbins

Response GP110-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP111, **Brown, Ray**

Comment GP111-1

Name: Ray L. Brown

City/State/Zip: Westpoint, WA 98595

My comments relate to both the Westway and Imperium Draft EISs.

These projects will bring much needed jobs and commerce to the area. In addition these companies have many people in leadership that have expertise in economic development. Plus they have networks that stretch around the world, energy is a universal language. Economic development skills, jobs, networking sounds good to me! Mitigation is a simple mater of engineering. Stop with the fear mongering already!!

Response GP111-1

Comment acknowledged.

GP112, **Brown, Ray**

Comment GP112-1

Good afternoon. My name is Ray Brown, I live in Westport, Grays Harbor Canyon, United States of America.

I fully support these projects, all three of them actually. And it goes well beyond the jobs and, you know, the temporary jobs, the permanent jobs. These companies are loaded with leadership that has a lot of skill and economic development, and they have that pretty much go around the world.

That would be of tremendous benefit. We can leverage that knowledge here in Grays Harbor County, I believe, and bring a lot more economic development to the harbor, not just the immediate jobs that will come from these projects.

I think it's ironic that we stand here in the rubble of an energy project that was defeated by the engineers many years ago. We've seen the disaster that resulted from that and the loss of revenue, the loss of jobs, prestige. I mean, we could have been the center of the universe in terms of the nuclear power of these projects and continue.

It's unfortunate that they did not, but we can correct that mistake by continuing this project. I think mitigation is the simple matter of engineering. I think any and all of those problems are easily overcome.

Again, I'd like to see these projects go ahead. I'd like to work with the companies that are going to bring these projects to town, to the county, and I think it would be a tremendous benefit to everybody in the county if we did that. Thank you.

Response GP112-1

Comment acknowledged.

GP113, **Brown, Ray**

Comment GP113-1

Hello, my name is Ray Brown. I live in Westport, which is actually a part of Grays Harbor County. What are we really talking about here? We are talking about adding a few more tanks to already existing tank farms. Most would be hard-pressed to tell the difference when the construction is complete.

This project will not go from zero to 60 instantly. This will develop slowly over a period of time. We need to calm down here. As permits are issued, contracts will be signed with the promise of future business financing can be arranged. Construction can begin and it takes a certain amount of time. Rail companies will see more business coming their way and operations will increase. Trains will go as they always have, carrying hazardous material as they always have. As issues crop up, there will be plenty of time to deal with them and figure things out, because the hysteria surrounding this issue is just that, hysteria.

There are over 70,000 living in this county and all of them will be benefitted by this project, some directly, some indirectly. We need these jobs. We need the business. More importantly, we need the economic development that these companies will bring with them. Energy is an international language and these companies speak that language fluently. I urge you to issue the permits.

Thank you very much.

Response GP113-1

Comment acknowledged.

GP114, **Brownell, Basilia**

Comment GP114-1

Oct. 6, 2015

To whom It May Concern:

Re: Expansion of the Grays Harbor Facility

I am opposed to the expansion of the Grays Harbor facility. We are dangerously close to a irreversible tipping point for global warming. We must keep more fossil fuel in the ground. We have a unique position to close the gate.

Sincerely, Basilia Brownell

Seattle, WA

Response GP114-1

Comment acknowledged.

GP115, **Browning, Linda**

Comment GP115-1

Please do not put our areas at risk--once these environment killing storage centers are built, they are there to stay, and we will not be able to prevent the damage that will come from leaks and accidents. Please consider the future, rather than short term profits and gains. Thank you.

Response GP115-1

Comment acknowledged.

GP116, **Bruton, Peggy**

Comment GP116-1

I am addressing the cumulative impacts portions of these documents. I do not think it is appropriate to suggest that the incremental carbon footprint of these facilities could be constrained by federal laws banning export of crude oil, or limiting refining capacity, because any assumption that these laws will withstand the extreme pressure now being brought to bear to secure their repeal. Nightly ads on national network TV make this point. These laws are tenuous, and cannot be seen as possible checks on the carbon footprint of these projects.

Response GP116-1

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

GP117, **Bruton, Peggy**

Comment GP117-1

The chapter on cumulative impacts appears to minimize the contribution of these projects to global warming, based on the U.S. prohibition of crude oil export and the limitation by law on refinery capacity. These laws can be removed at any time, and are under massive attack at this moment. It would seem to me there is no way these projects, should they be permitted, could avoid contributing significantly to global climate change, and to the perpetuation of global reliance on fossil fuels, at a time when all efforts should be focussed on switching to clean renewables.

Response GP117-1

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

GP118, **Burgoon, Susan**

Comment GP118-1

My name is Susan Burgoon. In mid September the Amtrak Cascade, just outside of Bellingham, trains conform to the posted speed of ten miles per hour. The oil cars that occupy main tracks, it necessitates slow speed on secondary track. It is a fact that the number of trains on the PS&P rail line will increase into Grays Harbor if the terminals are approved. However, these trains on BNSF rail lines and connect to the PS&P have not been addressed in environmental impact statement. The Amtrak Cascade operates on BNSF line. The impact on passenger rail service is unknown.

In Chapter 5, Extended Rail and Vessel Transport, page 4, the EIS states, Crude oil shipped by rail in Washington is currently going through the Columbia Gorge, but could transit over other rail routes. Same chapter, page 17, the DEIS states, BNSF has not specified a train route for crude oil unit trains in Washington state.

In 2010, Washington state received approximately $782 billion in federal bonds to improve high speed rail service on the section called the Pacific Northwest Cascade Corridor, one of the less high speed rail corridors designated by the federal government.

Pacific Coast Leaders for Americans Demand Justice for High Speed Rail, rail, particularly high speed rail, can deliver specific benefits to the region including energy conservation, congestion reduction, and job creation for citizens of region.

The absence of detail concerning Grays Harbor in an expanded study area demand comprehensive review of the impact on passenger rail. The safety response from federal government to improve high speed rail services, with those funds it seems to be responsible stewardship and the legal responsibility to safeguard . . .

Thank you.

Response GP118-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

GP119, **Burke, Denise**

Comment GP119-1

I am not finding information on the study of residential real estate prices and taxes for those homes within a half mile radius of a rail line. What have other areas experienced regarding the ability to sell a home? How does the addition of the rail line impact taxation? I submitted these questions during the review process and do not see this specifically addressed using the search tool. Thank you.

Response GP119-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values. Draft EIS Section 7.3.3.2, *Fiscal Revenues to the City of Hoquiam*, discusses property and leasehold excise tax, sales and use tax, business and occupation tax, utility and other taxes, licenses, and permits.

GP120, **Burnes, Thomas**

Comment GP120-1

4623 Village Ct. SE Olympia, WA 98501 October 12, 2015 Westway & lmperium Expansion Projects DEIS clo /CF International 710 Second Avenue, Suite 550 Seattle, WA 98104

SUBJECT: Comments Regarding The Westway & lmperium Expansion Projects DEIS

To Whom it may Concern,

The following are my comments regarding the Westway & lmperium Expansion Projects DEIS in addition to the PS&P Rail service to the proposed expansion sites. Specific Comments: Chapter 3. 15 Rail Traffic There is a significant discrepancy to the length of the PS&P rail line in the study area. The Executive Summary cites 59 miles; however, Chapter 3.15.4.2 cites that the line runs from Centralia

at Rail Mile (RM) O. O to RM 70. O at the Port of Grays Harbor. Footnote b states that Mile Post 13. 3 to 39. 8 is skipped? That is 26. 5 miles of skipped track in the study area.

Please clarify the length of affected rail line.

Response GP120-1

As described in the notes at the bottom of Table 3.15-2, PS&P Subdivisions (Draft EIS Chapter 3, Section 3.15, *Rail Traffic*), the milepost numbering skips a section from milepost 13.3 to 29.8, resulting in the physical track miles being less than the notated signage. The PS&P rail line begins at milepost 0.0 in Centralia and the track ends at milepost 75.2 in Hoquiam. The distance is approximately 59 miles.

Comment GP120-2

Chapter 3.15.4.2. Cites: The PS&P line between the BNSF main line in Centralia (MP 0.0) and its terminus in Hoquiam (MP 72.6) has 55 rail bridges (including box culverts). There are 52 rail bridges (including box culverts) between Centralia and the project site. All bridges cross waterways (sloughs, rivers, creeks, or intermittent streams)."

Is there an inspection schedule for these "rail bridges", i.e., water crossings? What are the current conditions of these structures? How often do they require removal of debris?

I suspect that Hi-Rail inspection does not adequately address maintenance needs at water crossings. For example, does a PS&P person physically get out of the Hi-Rail vehicle, walk down a steep fill slope and actually looks in the culverts before and after high flow events (especially at night) for occlusion (blockage by debris)? Without this address, water crossings, i.e., culverts, become plugged with debris resulting in water pooling up at the culvert inlet, saturating the rail road fill and compromising the rail crossing.

Nowhere In the DEIS Is there a mention of the current condition of the 55 rail crossings nor the Inspection, maintenance and the probability (which is real) of rail line failure especially during high flow events, a seismic event and/or a landslide. A complete inventory of all 55 documented rail crossings is needed as to their condition and ability to pass a 100 year flood event along with a soil study of potential fill failure at these crossings in the event of such a flood event.

WDFW currently maintains a Fish Passage Data Base on such crossings and should have inventoried all water crossings on SR 12 where the PS&P rail line runs alongside. I suggest you request a copy of PS&P owned water crossings that may exist on the data base.

The PS&P rail line is a century old (119 years to be exact). It was not designed to carry up to six fully loaded trains (120 cars/train) per day on fill within the Chehalis River flood plain and associated wetlands.

Each rail tank car weighs in excess of 286, 000 pounds fully loaded with 30, 000 gallons of crude. What is the potential that the rail line on a saturated fill will fail leading to a derailment? The likelihood of this happening is real as witnessed by the three derailments in 2014 in a two month period on this very same line. A geo-technlcal study is needed to determine if the rail line can safely handle the increase in crude oil transport.

General Comments: The PS&P Website: http://employees.org/-c/avlsonlpspl cites several concerns I have in general to the 100 year old railroad infrastructure and PS&P's ability to carry hazardous cargo, e.g., crude oil. The company cites the following:

Maintenance

Since the creation of the PS&P, the railroad has been gradually improving the maintenance facilities at Elma. A locomotive servicing pit was installed and plans include a shop building over that pit.

A mobile crane is in use on the railroad. The unit appears to be fairly old and was formerly owned by the US Navy. The crane is used primarily for track maintenance and can frequently be viewed in Elma. While the PS&P does not have major maintenance facilities and has been resourceful in working around this limitation. In the summer of 1998 they exchanged trucks from PS&P 3005 and AZ&CA 3802 in the Aberdeen yard."

I gather from the above that the existing maintenance facility would not be adequate to address increase rail traffic and that the Company has had to be resourceful in working around the limitations of not having a major maintenance facility. In addition the Company has to rely on a fairly old mobile crane that is used for track maintenance.

The Company's own website, leaves little doubt In my mind that PS&P cannot safely transport crude oil nor should It be allowed to under Federal Regulators governing such commerce.

In the event of a fill fa/lure and potential derailment of a loaded tank car at one of the water crossings, what is there to prevent harm to the public or aquatic life, i.e., fish In the event of a spill?

Response GP120-2

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for information about the analysis of emergency planning and response capabilities.

Comment GP120-3

Chapter 3.16 Vehicle Traffic & Safety Chapter 3.16.3.2 Impact Analysis cites:

Emergency Access "An increase in vehicle delay at PS&P grade crossings could affect emergency access and response time. A qualitative analysis was conducted to identify potential impacts on emergency vehicle response and access under the proposed action at PS&P grade crossings. The analysis identified areas along the PS&P rail line where the emergency vehicle response and access would substantially change."

Increase rail traffic and train length will (not could) affect emergency access and response time in looking at the various Tables within Attachment L-1 Vehicle Traffic Modeling threatening human life. Let's look at one example, a one-way in, one way out road such as Moore Road, ID 096648. Upon review of Google Map, 39 Farms/Residences are located behind the one-way rail crossing. If a member of one of these residents were to suffer a heart attack or a life threatening injury due to a farm accident, the cited delay for first responders would be 6. 58 minutes or longer in order to wait out a mile long train.

Time is of the essence in getting first responders to a person suffering from a heart attack or a life threatening injury.

How many one-way crossings exist on the rail line where first responders would be blocked from responding to a life threatening situation such as Moore Road?

The DEIS should succinctly state that Increase rail traffic and delay time for first responders will affect emergency access and response time resulting at times in loss of human life.

In Summary: The above comments are just a few of many of the high risks posed by The Westway and lmperium Expansion Projects. Having gone through the pages of the DEIS, I found that the overall risks to human health, terrestrial and aquatic life and long term impacts to the environment from the construction, on/off site(PS&P) operations and/or a spill have been downplayed in this document.

Both Westway and lmperium officials have been quoted in the past as stating that "if the projects were to pose a high risk to public health and safety, the projects would not go forward."

I recommend that Westway and lmperium take a no-action alternative to their plans to expand their existing facilities due to the aforementioned risks.

Thank you for considering my comments. Thomas Bums

cc: Governor Jay lnslee Senator Kevin Ranker Sally Toteff, WDOE Brian Shay, City of Hoquiam The Surfrider Foundation The Friends of Grays Harbor Washington Environmental Council Earth Justice

Response GP120-3

As described in Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, increased vehicle delay from trains related to the proposed action would also increase emergency vehicle delay at grade crossings. Delays would affect emergency response times if an emergency vehicle was blocked at a grade crossing occupied by a proposed action train. The potential for the proposed action to affect emergency response would also depend on whether the dispatched emergency vehicle would need to cross the PS&P rail line and the availability of alternative routes if a train occupies the crossing at the time of the call.

Average vehicle delay would slightly increase compared to the no-action alternative at grade crossing between Centralia and Aberdeen. Vehicle delay at grade crossings in Centralia would be greater; however because emergency response providers are located on both sides of the PS&P rail line, emergency response calls could be dispatched to stations that would not be blocked. The most significant vehicle delay would occur in Aberdeen from rail switching operations near Poynor Yard can block access to the Olympic Gateway Plaza and Port of Grays Harbor areas. Final EIS Section 3.16 reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These

procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

GP121, **Burns, Daniel**

Comment GP121-1

I am in support of the project. 1. Rail is the safest mode of transportation of goods and services. 2. This will bring money and jobs to the Harbor. 3. This oil is going somewhere, so we are not protecting the environment by stopping the Grays Harbor proposal, the oil will just go elsewhere, to another community and bring them money and jobs so lets bring the money to Grays Harbor where it is desperately needed. 4. If the QIN can put a Gas station on the edge of the Wishkah river then the QIN have no basis to stand against this project over environmental concerns. Please allow this project to continue.

Response GP121-1

Comment acknowledged.

GP122, **Bussmann, Krissy**

Comment GP122-1

THE TIME TO ACT IS NOW. Unfortunately, by the time the effects of carbon emissions are apparent, we have already done lasting and expensive damage to our planet. Please do not expand our dependency on fossil fuels!

We also desperately need to limit the risk of severe oil spills.

The Columbia is already threatened by nuclear waste at Hanford and the already ongoing warming trends are killing fish and creating environments favorable to toxic algal blooms. Please do not contribute to the waste of our home and our environment.

Response GP122-1

Comment acknowledged.

GP123, **Butler, Quinn**

Comment GP123-1

Westway and Imperium Terminal Services Expansion Projects EISs are absolutely not worth the risks of negatively impacted the environment and way of life of so many people. The risk of an oil spill or accident is not theoretical; we have seen oil trains explode across North America, including the tragic accident in Lac-Mégantic, Quebec, that killed 47 people in 2013. We have seen oil spills all along the rail route. And in 1988, one year before the Exxon Valdez, the Nestucca barge 231,000-gallon spill of heavy oil off Grays Harbor fouled beaches from Oregon to Vancouver Island and killed 56,000 sea birds. Washington's ocean, waves and beaches are vital recreational, economic and ecological treasures that will be polluted by an increase in the transportation of fossil fuels thru sensitive ecological areas.

Instead of pursuing transient and environmentally harmful ways to meet America's energy needs, we should seek comprehensive and environmentally sustainable energy solutions, including energy conservation.

As a citizen of Earth and a self-appointed spokesperson for those who are not physically capable of writing this to you for a myriad of reasons (one being he/she may not be born yet), I strongly urge you to not be selfish and greedy, and instead make the right decision for your life, your kids' lives, your neighbors and friends and family, and the rest of the global community and shutdown these proposals once and for all. HAPPY HOLIDAYS!

Response GP123-1

Comment acknowledged.

GP124, **Callos, Duane**

Comment GP124-1

I have lived at my current address (2217 Morgan St. Aberdeen, WA) for over thirty years and have always felt safe and pleased with my neighborhood and surrounding environment. In view of all the derailments and explosions that have happened to "crude by rail" in the recent past, I will be forced to move my family to another, safer location if this project is approved. I realize there are plans for safer rail cars (that have shown that they also may explode), improved first response, and improved clean-up. Even if all these things happen, in the event of a derailment, none or all of them would help myself and my family as our home is located just 95 feet from the rail line. It would be very difficult for us to move. The value of our house would plummet because nobody would choose to live in an unsafe environment Please do not approve this project so that my family and our neighbors can sleep at night without concern and continue to live in the homes we love in a safe environment.

Response GP124-1

Comment acknowledged.

GP125, **Campbell, Kevin**

Comment GP125-1

I have operated and managed tugboats in Grays Harbor for 30 plus years. At the beginning of my career Grays Harbor received twice as many vessel calls per year as we currently do. During the years of 250 plus vessel calls plus tug and barge traffic we never have had an incident in the Grays Harbor channel which proves that Grays Harbor is a safe harbor for increased vessel traffic. Brusco Tug and Barge within the last two years has positioned State of the art ASD tractor tugboats that substantially increases safety and provides escort tugboats that are capable of being tethered to vessels while underway. I believe that Grays Harbor is very well suited for increased vessel traffic including oil tankers and ATB vessel and in need of the increased traffic to utilize the equipment that is presently available to vessels calling Grays Harbor

Response GP125-1

Comment acknowledged.

GP126, **Campbell, Rebecca**

Comment GP126-1

REMARKS TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY ON CRUDE OIL TRAINS, ABERDEEN PUBLIC HEARING-OCTOBER 8, 2015

I recently moved from Seattle to Olympia, Washington State. One of the reasons I made this move was, that I was living in an apartment on a rise right above the iconic Pike Street Public Market. This put me within the potential 200-yard blast zone of mile-long crude oil "bomb" trains moving several times a day thru the century-old tunnel directly beneath the Pike Place Market and the Seattle downtown historic district, as well as within 20 yards of the two much-frequented sports stadiums in the South Downtown neighborhood. This was manifestly endangering the valuable urban built environment/infrastructure of Seattle, and the even more precious lives of tens of thousands of people, including my own.

The fact that Berkshire-Hathaway -- read billionaire Warren Buffett -- -owned -- BNSF Railroad is continuing to operate these catastrophes on wheels through the thickly populated Columbia Gorge/coastal areas of Western Washington is a crime against nature and humanity being perpetrated by BNSF and the federal and state corporate governments continuing to allow this "a-bomb-i-nation". The magnitude of this crime is not in any way mitigated by claims of state and federal officials that they are attempting to regulate it; such a crime does not need to be ***regulated*** -- it needs to ***eliminated***. Its perpetrators need to be held accountable and charged with criminal malfeasance and reckless public endangerment, including BNSF corporate executives/owners, as well as the federal and state government officials who have enabled this crime against nature and humanity to continue. This is despite the forewarnings given by numerous destructive crude oil train derailings throughout North America over the past several years, including the decimation of Lac Mecantique in Quebec Province, Canada killing 47 people in a village business district the size of the Pike Place Public Market in July 2013.

Here are a few other of the numerous aspects of this crime against nature and humanity being presently enabled by BNSF executives/owners, as well as by federal and state officials, including, so far, by the Washington State Department of Apology:

1. BNSF, as previously mentioned, refuses to curtail running mile-long crude oil "bomb" trains 20 yards from the Seattle stadiums filled with tens of thousands of people during sporting and other entertainment events;

2. BNSF refuses to provide local officials, including local first responders and planners, with schedules of when these "a-bomb-i-nations" will be running, declaring this to be "proprietary information", while continuing with the gross criminal malfeasance and reckless public endangerment cited in Point No. 1;

3. BNSF, with the approval so far of federal and state officials, has continued to do this without catastrophic insurance coverage adequate to cover any disaster their crude oil "bomb" trains may cause to the people, natural environment and/or infrastructure of Washington State, grossly and needlessly endangering the people of Washington State not only physically, but financially as well;

4. BNSF, with the approval so far of federal and state officials, refuses to run its crude oil "bomb" trains on the sparsely populated Northern Transcontinental Railroad Route through the Cascade

Mountains, insisting instead on using the heavily populated Columbia Gorge/Washington State coastal routes. This constitutes, on the part of BNSF management/owners and its enabling federal/state officials, deliberate denial of remedy indicating collusion in criminal conspiracy;

5. BNSF, with the approval so far of federal and state officials, has continued to violate treaties made with the Swinomish, Quileute and Lummi peoples concerning trespassing railroads rights-of-way on their lands and waterways since the mid-19th century.

This fact of law should have immediately induced federal and state government officials to shut down BNSF's operation of crude oil "bomb" trains from their beginning on the coast of Western Washington State. The fact that these sovereign Indian nations are having to file lawsuits in US federal courts to enforce these long-standing tribal treaties, rather than federal and state officials using their designated authority to enforce them, shows the massive degree of corruption that has permeated corporate-controlled government at all levels in our country, including, as often recently demonstrated, our federal courts of law.

Therefore, if the United States government, the government of Washington State and, finally, the federal courts, refuse to take action to enforce these treaties -- contracts that, if actually enforced, could effectively shut down the criminal malfeasance and reckless public endangerment of BNSF's crude oil "bomb" train operations in Washington State -- another type of cost-and time-effective but powerful legal action outside the corrupt federal corporate court system will need to be employed. Anyone interested in potentially taking such alternative legal action should see me before I leave the hearing hall this tonight. Thank you and good evening.

See original attachment for photos

[Photos reviewed but not reproduced.]

Response GP126-1

Refer to the Master Response for Purpose and Focus of the EIS.

GP127, **Campbell, Rebecca**

Comment GP127-1

Rebecca Campbell, Olympia. The running of oil bomb trains through the western Washington area and other areas are crimes against humanity and nature. The responsibility of public officials is not to regulate such crimes or mitigate such crimes, but eliminate such crimes.

BNSF railroad refuses to curtail mile long crude oil bomb trains yards from Seattle stadiums filled with tens of thousands of people during sports and other entertainment events.

The BNSF refuses to provide local officials, including local first responders or planners, with schedules when these abominations will be running while continuing with the criminal malfeasance and reckless public endangerment mentioned in point number one.

The DEIS, with the approval of federal and state officials, including the State Department of Ecology refuses to run its crude oil bomb trains on the sparsely populated Northern Transcontinental Railroad route, instead using the heavily populated Columbia Gorge, Washington state coastal

routes. This constitutes on the part of BNSF's management, and owners, and enabling state officials deliberate denial of remedy, entertaining pollution and criminal conspiracy.

BNSF with state officials has continued to violate treaties made to the Sequimish, Prairie, and Lummi peoples by putting trespassing railroad passageways on their lands and waterways since the mid 1970s.

Therefore if this state government and the federal officials cannot make a decision just and true, preservative of its earth and its people, then other means, besides the courts, must be found. If this happens see me afterwards. There's another way it can be dealt with legally.

Thank you.

Response GP127-1

Comment acknowledged.

GP128, **Cannady, David**

Comment GP128-1

Hello. First of all, I would like to thank you all for coming. I know your time is valuable, taking away from your families. So, I want to say thank you for coming.

My name is David Cannady. Unlike most of the people that are in the audience, I was not raised in Grays Harbor. My wife and I were imported into the U.S. Navy. And, but, I'm also a UW graduate, and I'm accountant by trade, my wife is a professional. We choose to live in Grays Harbor like a lot of these folks. We could live anywhere in Washington state pretty much, and we chose to live here.

And as young professionals, we built a business. We believe in Grays Harbor and we believe in the future of Grays Harbor. If I mention the business, it's highly popular in this area that we own. And I would like to say I hugely support what the residents are saying.

And the last thing I want to say, as an accountant, the probability of an oil spill goes up. Year after year after year, the probability has to be at some point not if, but when. And I mean, we all know that there's always risk.

But for the people that work here and live here, as the probability factor goes up, it's imminent it will happen. Imminent. And I value this area or I wouldn't be here.

And I encourage the young adults in the area to come back to the area, but why would they want to come back to something happening that will destroy the area.

Thank you.

Response GP128-1

Comment acknowledged.

GP129, **Canny, Maureen**

Comment GP129-1

Name: Maureen Canny
City/ State/ Zip: Olympia, WA 98516

Please deny permits for the nearly infinite number of reasons stated by more eloquent speakers—reasons I am unable to list.

Protect lives, our ecosystem, the "commons" (air, water, soil…) and our future generation.

Denial of these permits will also help to move our economy away from a fossil-fueled based system to a more sustainable basis.

Thank you.

Response GP129-1

Comment acknowledged.

GP130, **Capozzelli, J**

Comment GP130-1

Westway and Imperium Terminal Services Expansion Projects EISs c/o ICF International 710 Secorrd Street Suite S50· Seattle, WA 98104

RE: Westway and Imperium Crude Oil-by-Rail Terminal EISs

I am writing because I have read that the findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor-show that the risks of oil spills cannot be fully mitigated and that environmental damage to marine habitat and wildlife could be significant. Similar findings exist for waterway contamination, train accidents, increase train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings.

Response GP130-1

Final EIS Chapter 3, Section 3.2, *Air*, has been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analysis predict lower emissions; the updated level of increased risk is not considered significant. Therefore, the Final EIS concludes no potential unavoidable and significant adverse impacts on air quality.

Comment GP130-2

Due to such numerous and enormous risks, I join with those in Washington State who ask you to reject the Westway and Imperium oil terminal proposals. I Critical coastal estuaries could face devastating consequences for birds if the oil industry is successful in expanding operations in Grays Harbor-a site visited by hundreds of thousands of migrating shorebirds every year. Three proposed new oil terminals would store roughly 91 million gallons of toxic crude, most of it for export to

China. Birds rely on this Pacific coast estuary to rest and refuel during migration. One oil spill would devastate this fragile marine ecosystem.

Grays Harbor is a site of hemispheric importance to birds. Surrounded by six Important Bird Areas, Grays Harbor is host to hundreds of thousands of resident and migrating birds that rely on this Pacific Coast estuary. Several species protected under the Endangered Species Act are likely to be harmed by these projects, including the Marbled Murrelet, Snowy Plover, and Streaked Horned Lark.

Recent research by the Washington Department of Fish and Wildlife shows that the Pacific population of the Red Knot uses the North Bay of Grays Harbor almost exclusively as its one refueling site during its long migration from Mexico to breeding grounds in Alaska and beyond. One oil spill could have devastating effects on this species' survival. One oil spill or accident in Grays Harbor could wipe out a significant portion of the Red Know population in the Pacific Flyway. Furthermore, the cumulative release of toxic chemicals and oil leaks is known to have negative effects on endangered salmon and other small fish upon which birds rely.

Response GP130-2

Draft EIS Chapter 3, Section 3.5, *Animals*, addresses potential impacts of construction and routine operation of the proposed action on animals, including birds such as red knots. Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment GP130-3

There are better ways to meet our energy needs. Instead, Washington State could continue to lead the nation on safe, renewable clean energy solutions and say no to more oil and coal. Building more infrastructure for yesterday's energy would be moving in the wrong direction. (And most of this project is for export to China.)

I support the protection of Grays Harbor, its marine life, and its people, and ask you to reject the proposed Westway and Imperium oil terminals.

Thank you for your consideration.

Yours truly, J. Capozzelli New York, NY

Response GP130-3

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States,

West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP131, **Carlson, Joel**

Comment GP131-1

Fossil fuel spills would devastate our pristine Puget Sound and surrounding environment for many years. We must not allow transport of fossil fuels through the Pacific Northwest! Global warming fossil fuels must stay in the ground so we don't destroy life on earth in our current sixth great mass extinction. Almost all life on earth disappeared in previous mass extinctions. We must very quickly switch to renewable energy including solar. Electric vehicles keep costing less while going farther on a charge so fossil fuel vehicles must be eliminated. Wood construction including large multi-story projects sequesters a lot of carbon. Many trees must be planted. Now is the time for action! See https://www.youtube.com/watch?v=sRGVTK-AAvw .

Response GP131-1

Comment acknowledged.

GP132, **Carlson, Joel**

Comment GP132-1

We must not destroy our pristine environment in the Pacific Northwest with dirty fossil fuels that could explode and kill millions! Global warming fossil fuels must stay in the ground so we don't destroy life on earth in our current sixth great mass extinction. Almost all life on earth disappeared in previous mass extinctions. We must very quickly switch to renewable energy including solar. Electric vehicles keep costing less while going farther on a charge so fossil fuel vehicles must be eliminated. Wood construction including large multi-story projects sequesters a lot of carbon. Many trees must be planted. Now is the time for action! See https://www.youtube.com/watch?v=sRGVTK-AAvw .

Response GP132-1

Comment acknowledged.

GP133, **Carol**

Comment GP133-1

Dangers from and projected accidents due to Vessel traffic increases of 450% of crude oil storage and shipping in Grays Harbor have not been fully considered, nor mitigated in this DEIS.The vessel traffic, including tankers 3 football fields long will displace other traffic-pure and simple. Interfering with marine resources and exacerbating shell fish-all fish with increases fuels, spillage and leaking into waters hosting crab nurseries. To say this will not be harmful is pure nonsense.

Response GP133-1

Draft EIS Chapter 4, Section 4.6, *Environmental Health Risks—Vessel Transport*, presents an analysis of potential impacts from increased risk of vessel collisions, groundings, allisions, and related consequences (e.g., release of crude oil) under the proposed action and proposes mitigation measures to reduce the likelihood of a vessel incident.

Comment GP133-2

DEIS Appendix N-page N-3-lacks reliable data" uses data from previous estimated rivers." Also, The considerations for resulting disastrous oil spills -as applied to tidal flows in Grays Harbor are not calculated by considering the true flows of The Chehalis R. Rather tides are based on models-not the Chehalis River Estuary and thus are wholly incorrect, invalid and inaccurate.

Response GP133-2

Refer to the Master Response for Oil Spill Modeling Methods for a discussion of the purpose of and limitations to the oil spill modeling.

GP134, **Carter, Al**

Comment GP134-1

My comments are for both Westway and Imperium EISs. I work for Ocean Gold Seafoods Inc in Westport Wa. We support annually 400 to 500 jobs processing fish. An oil spill of any kind would put our business a risk for closing. Just the knowledge that an oil spill occurred within our waters would cause our customers to delay or cancel buying our products for fear of contamination.

Response GP134-1

Comment acknowledged.

Comment GP134-2

Both sites are within the liquifaction areas of Grays Harbor They are on unstable soils within the areas that would be affected by earthquakes. Under current rules the safety factor for holding tanks is 110% of one tank. Both projects have multiple tanks and hold millions of gallons of oil. The proposed tank farms are within 70 miles of Cascadia Subduction zone. An earthquake and the tsunami that will follow could cause those tanks to rupture and the resulting influx of massive amounts of water will push oil into the upper reaches of our many rivers, estuaries and habitat for endangered salmon.

Response GP134-2

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP134-3

We are an International flyway for millions of shorebirds every year. Any oil spill will be spread across the very mudflats that are critical to the survival of many of these species of birds. A recent Port of Grays Harbor study states 2200 jobs and over $220,000,000 annually come from fishing activity in Westport. A 2012 NOAA study on the importance of our nation's economy identified 67,000 in Washington state that are based in seafood related commercial and recreational activities. Grays Harbor is a major nursery area for dungeness crab and supports both tribal and non-tribal fishers that deliver on average $44,000,000 each year and support over 600 fishers, and contributes an estimated 80 to 150 million dollars in economic value to the state.

Response GP134-3

Comment acknowledged.

Comment GP134-4

These two projects will increase the vessel traffic by 450% adding 728 annual large tanked vessel bar transits. This amount of increase will likely increase conflicts with current fishing operations as the larger vessels are given the right of way and will close the harbor during their transits.

Response GP134-4

Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, discusses potential impacts on commercial fishing and proposed mitigation measures that would reduce impacts.

Comment GP134-5

Currently we have only one rail line that enters Grays Harbor. Many sections of this line are nearly 100 years old. The tracks have not been maintained to handle the increased loads of crude oil or the weight of such train cars. We have had 4 derailments in the last year caused by nothing more than the annual rain fall and the weight of grain cars sitting in the rail yard. Tidal currents in Grays Harbor reach 3.5 knots on over 100 days per year. According to the International Tankers Owners Pollution Federation limited and the Governors Oil Safety Study recovery of oil in that type of environment results in 10-15% recovery of spilled oil. The rest will not sink in fast moving water it will be spread across every estuary and waterway in Grays Harbor and up and down the coast. I own approximately $250,000 in property in Hoquiam.

Response GP134-5

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not

completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP134-6

If an oil spill happens, who will cover my loss of income, loss of property value and loss of use of my property? The draft EISs do not account for who will be paying for the equipment, manpower and clean up of an oil spill. These are limited liability companies. They are designed to limit the liability of the owners and push the cost off onto the public and local taxpayers. Many people like myself have invested in Grays Harbor. All we have is invested here in what we own. These companies are buying crude oil, leasing train cars, leasing tank farms, and leasing barge or ships to transport the most dangerous crude oil yet discovered through our backyard. They are not invested here, they only want to use our facilities to transport through. They make all the money and we take all the risks. Please rejects these draft EISs as inadequate and insufficient and deny the permits to use Grays Harbor as their dumping ground for toxic crude oil.

Response GP134-6

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP135, **Carter, Albert**

Comment GP135-1

My name is AI Carter, I live at 315 Lawrence Drive, Hoquiam.

I am a former Grays Harbor County commissioner. I own five properties in Hoquiam so I am invested here.

When the inevitable happens and we have an explosion of train cars, a spill during transferring of oil, or worse a collision in our harbor, my property values will go to zero. Who will compensate me for the loss of my investments?

Response GP135-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP135-2

On the Port of GH website they state that there are 5204 jobs supported by Port activity. More than 2000 of those jobs are in the fishing, shellfish growing and fish processing industries. To put at risk over 2000 existing jobs for a promise of 73 jobs is reckless and a bad business decision.

An oil spill of any kind would do unmeasurable damage to our fishing industry, tourism industry, and possibly destroy an international migration route of hemispheric importance for the world's population of shorebirds.

Response GP135-2

Comment acknowledged.

Comment GP135-3

As county commissioner, I cut the ribbon on the Biodiesel plant. Westway Terminals soon followed. The county supplied the economic development money for the (5 rail crossings) at the Port of GH. So I am a supporter of the Port and economic development.

I work for Ocean Gold Seafoods as the Safety and Compliance Manager.

The fishing industry is one of the most highly regulated industries in America. As a Safety and Compliance Manager, I deal with the DOE every day. We test our storm water, waste water, and all chemicals used in our processing and the air quality emitted from our plants. We must account for everything we do. We are responsible for everything we do and must do so in the open under scrutiny by numerous agencies. That does not seem to be the case with the oil industry or the railroad industry.

The city of Hoquiam and the DOE made the decision these projects were of Non-significance to the environment. It took a lawsuit by the Quinault Nation to force our public decision makers to make these projects go through the EIS process.

The proposed Oil Terminals are Limited Liability Corporations. They are structured to limit the liability of the people who operate them.

They buy crude oil, rent train cars, and rent terminal facilities and rent barges or ships to transport the oil. They will ship this highly volatile, unstable and explosive crude oil through our community. They make the profit and we take all the risks.

This is very simply, bad leadership by the Port of GH, the city of Hoquiam and the Dept. of Ecology.

Response GP135-3

Comment acknowledged.

Comment GP135-4

These proposals to expand and ship crude oil should be rejected as unsafe and too risky for the inhabitants and the environment of Grays Harbor County.

Response GP135-4

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP136, **Carter, Judy**

Comment GP136-1

My name is Judy Carter. I'm from Hoquiam. And my husband spoke earlier. We have property. We've invested quite a bit into our properties. It's a big part of our retirement. And we are really concerned about how a project like this can affect our real estate value.

But more importantly, I'm talking as a citizen. I've lived here my entire life. I raised my family here. We still have all sorts of people that live in the area, people we care about. We live here for a certain lifestyle.

This type of project is going to have dramatic impacts on those of us who like to go out and watch the birds. I'm really concerned about the wildlife refuge, as I'm sure has already been mentioned.

But I'm also concerned about what the perception of what our town is going to look like to other people. Are they going to want to move into an area that is going to be affected by possible explosions? Not only these issues, but also the leakage, the impact to traffic, all of those other issues that affect our quality of life in this area.

If people don't want to move here because they're perceiving us as a dirty oil town, it's not going to be good for our communities and for our children who grew up here. And we want our children to stay here, get an education and come back and contribute to our area.

But if this is a dirty, dying town, who wants to do that? Instead of a community that's dying we need to grow. And I would like you to consider the long-range impact on the lifestyle of the people that live here, which is part of the environment and all the other concerns that you should be looking at, but I think the quality of life of the citizens is really important.

So, thank you.

Response GP136-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

GP137, **Cates, Eddy**

Comment GP137-1

Hello, my name is Eddy Cates. I'm a member of the Washington State Medical Association, and I'm a practicing family doctor in Lacey. I come before you today to urge you to deny the permits of the oil transport terminal in this county.

Why I took time out to address this board, I'm here because this is a pressing issue that has important implications for the health and safety of our communities. The urgency of this topic proposal is so strong, so strong impact on September 27 the Washington State Medical Association passed a resolution in its annual meeting ten days ago to address concerns raised by all those in the community.

The WSMA resolution charged the organization to support their position works to prevent or minimize potential health effects related to the transportation of coal and oil by train through Washington state.

And secondly, to make a comment and express the health and safety concerns to the proposals for oil and coal terminal and their infrastructure. That's why I'm here today.

Why is the community wrapped so strongly around this issue? We have done so because we recognize the known risks associated with oil by rail transport, oil tank storage, oil transport by vessel. These risks are unacceptable for human safety.

Doctors are deeply troubled by the safety -- health and safety of these proposals. The impacts of oil by rail transport storage, oil tank storage at the Port of Washington are well documented. They include air pollution, specifically diesel, diesel particulate matter are associated with a number of health risks. Increased water pollution, delays in emergency vehicles across rail transits.

In summary, I'm here to make it clear that these projects are not concerning only to environmentalist, fisherman, and the local community, but also the broad medical community and the Washington State Medical Association.

Response GP137-1

Comment acknowledged.

GP138, **Chapin, David**

Comment GP138-1

Comments on:

Westway and Imperium Expansion Projects
Draft Environmental Impact Statements
Comments by:
David Chapin, Ph.D.
17826 NE 27th St.
Redmond, WA 98052
dchapin84@hotmail.com

The Draft Environmental Impact Statements for Westway and Imperium Expansion Projects provide a multitude of reasons why these projects should not go forth. I oppose these projects because they would:

- increase air pollution from site facilities in the Hoquiam/Aberdeen area and from diesel engines along the entire rail route from North Dakota Bakken oil fields and the Alberta tar sands;

- expose communities in along the entire rail route to the risk of massive explosions in the event of train derailment;
    - the expansion of these facilities endangers people from the west coast to North Dakota by increasing the frequency and volume of oil trains;
- disrupt transportation and access by emergency vehicles in Hoquiam/Aberdeen with increased train traffic;
- pose a high risk to very valuable and sensitive marine resources in Grays Harbor and the Washington coast line due to transport and storage of highly toxic crude oil;
- result in major increases in tanker traffic to Grays Harbor, increasing the risk of an oil spill to sensitive marine resources;
- greatly increase the impacts of spilled oil resulting from an earthquake and tsunami from the Cascade Subduction Zone.
    - The DEIS states an earthquake having a 30-50% probability of occurrence for 6.0 magnitude event and a 10-12% probability for a devastating 8.0 magnitude event; with these probabilities, the idea of expanding the oil transport facility in Grays Harbor is ludicrous.
- increase global warming as a result of bringing Bakken and tar sands crude to potential markets in the U.S. and Asia
    - The DEIS is incorrect in saying that "there is reason to believe that much of the crude oil being transported to the new facility would replace crude oil that was previously transported by tank ship." (3-2-20) Existing oil delivered by tank ship is mainly coming from Alaska, where oil production is dropping dramatically. These sources will continue to decline. So oil transported by rail will definitely replace oil previously transported by ship.
    - The DEIS is incorrect in saying that " Even if the proposed facility is not built, additional GHG emissions from end use may still occur over the course of the analysis period. This is because the product could be transported to another facility for use or exported depending on the source of the oil, the type of oil, and the final point of delivery." (3-2-21) This assumes that oil ports elsewhere on the Pacific Coast will expand to accommodate Bakken and tar sands oil delivery. With the Keystone XL pipeline off the table and no expansion of west coast oil ports, these oil sources will not have additional outlets to bring their oil to market and will therefore be much more likely to be left in the ground. There is no basis to assume that other west coast oil ports will expand or that other pipeline will be built to allow the oil intended for these facilities to go elsewhere.

For these and other reasons, the expansion of the Westway and Imperium oil transport facilities makes no sense. We need to, and are, transitioning away from fossil fuels toward an economy based on renewable energy. With that transition well underway, there is no need to continue building infrastructure for the fossil fuel industry. <u>The only reason to build these facilities is to allow the oil industry to make more profits.</u>

<u>The only sensible alternative is the "no-action" alternative.</u> While some of the direct impacts of the project on the immediate environment of the facilities can be partially mitigated, risks of oil spill, explosions, and climate change - all of which would be catastrophic - cannot be mitigated adequately to make these projects acceptable.

As stated in the DEIS web site (http://www.ecy.wa.gov/geographic/graysharbor/factsheet-safety.html), "*A large oil spill, fire, or explosion would likely include unavoidable and significant adverse environmental impacts*." So the question becomes, does the benefit of more oil being brought to these terminals outweigh the very real and large risks to people and ecosystems? The benefit of more oil, except to the oil industry, is nil, whereas the risks are high. The answer to the question is obvious: the benefits do not outweigh the risks. These facilities should not be built.

Response GP138-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP139, **Chappell, Lisa**

Comment GP139-1

I am concerned that if these are approved my property value will decrease and I will not be able to sell my home, how will I and others in the community be compensated for this loss? Deny the permits.

Response GP139-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

GP140, **Chappell, Lisa**

Comment GP140-1

Currently, trains that are stopped cut off some communities. There have been children who have not been able to get home after school because trains have blocked their access and there is no way around this, even for vehicles. At times parents are not able to get to their children who are stuck on the other side of a stopped train. Children, alone or in groups, have been seen crawling under stopped trains as their only route to get home. Children of any age should not be put at such risk this is far too dangerous. Children should not be forced to wait for a train to move in order for them to get home, especially in inclement weather. Parents need a way to be able to access their children when they are stuck on the other side of a stopped train. How will this be prevented? Deny the permits.

Response GP140-1

Comment acknowledged.

GP141, **Chappell, Lisa**

Comment GP141-1

When a train explodes or derails, there will be damages that cannot ever be repaired or recovered, specifically the loss of human life. Who will take care of families who have lost their main provider or providers as a result of death or injury due to a train derailment or explosion? Deny the permits.

Response GP141-1

Comment acknowledged.

GP142, **Chappell, Lisa**

Comment GP142-1

A derailed or exploded crude oil train in Grays Harbor County will be a monumental disaster as has been witnessed in Lac Megantac. First Responders, victims who live through the disaster, individuals who come in to help rescue wildlife or other animals (pets, livestock, etc), and those who have lost family members or place of employment or their homes and all of their possessions, will all be traumatized. Children will be left without parents, parents will be left without children (especially

since schools are so closely located to the proposed sites in Hoquiam, and families will be left homeless. The traumas caused by this reckless action will not be unlike that of those who have survived a war. As a provider of services to victims of violent crimes, I have seen the devastating effects of Post Traumatic Stress Disorder (PTSD; commonly the impacts of PTSD last a lifetime and negatively effect the quality of people's lives. Who will be financially responsible for the psychological effects of a crude by rail disaster on all of the aforementioned groups of people and others which I have not included? Please, deny the permits!

Response GP142-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Final EIS Chapter 4 has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

GP143, **Chappell, Lisa**

Comment GP143-1

I live in Hoquiam, in the blast zone when a crude by rail disaster would occur if this permit is approved. If I survive this disaster but my home is destroyed, who will pay for my relocation and the replacement of my possessions? Many of my possessions are irreplaceable, this cannot be mitigated. Please deny the permits.

Response GP143-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP144, **Chappell, Lisa**

Comment GP144-1

I live in Hoquiam, in the blast zone when a crude by rail disaster would occur if this permit is approved. If I survive this disaster but am maimed, who will provide for my medical costs, my future financial needs, and my future medical care? Please deny the permits.

Response GP144-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP145, **Chappell, Lisa**

Comment GP145-1

I live in Hoquiam, in the blast zone when a crude by rail disaster would occur if this permit is approved. If I survive this disaster but my means of transportation are destroyed, who will pay for the replacement of my vehicles? This is especially a concern if the corporations involved are able to immediately declare bankruptcy and will then not be held liable for losses such as this and other losses. Please deny the permits.

Response GP145-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP146, **Chappell, Lisa**

Comment GP146-1

The potential for disaster from a crude by rail explosion or derailment is significant anywhere along the rail line. In the event of a disaster who will be held financially responsible for the tremendous losses that will occur? Are the companies going to be able to declare bankruptcy as they did in Lac Megantac? The current insurance requirements do not even begin to cover the potential cost of such losses. Who will be liable for the costs of a crude by rail disaster? The permits must be denied!

Response GP146-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents

for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP147, **Chappell, Lisa**

Comment GP147-1

I live in Hoquiam, in the blast zone when a crude by rail disaster would occur if this permit is approved. If I survive this disaster but my means of transportation are destroyed, who will pay for the replacement of my vehicles? This is especially a concern if the corporations involved are able to immediately declare bankruptcy and will then not be held liable for losses such as this and other losses. Please deny the permits.

Response GP147-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP148, **Chappell, Lisa**

Comment GP148-1

Hi, I'm Lisa Chappell. I live in Hoquiam in the blast zone. My professional career has been spent with victims of violent crime, all these men, women, children permanently scarred by the horror they have experienced.

Most of these victims many will suffer from PTSD for the rest of their lives. Victims of the bomb train explosion will also suffer from PTSD. There is nothing in the DEIS that addresses who will attend to the immediate and lifelong psychological scars that the victims of a crude oil disaster will experience, from people who have lost family members, homes, jobs, those who have been injured, and the rescue workers will come to the aid of humans and wildlife.

And on a more personal note, Brian, who will comfort your newborn and your older children when a bomb train explodes and Hoquiam City Hall is incinerated and your children are left without a father? This room is filled -- or was filled with my friends and my neighbors. People that I love. I cherish this community.

Another issue that was not addressed in DEIS is what will happen to those of us who happen to survive the coming disaster, but we have lost people we love and everything that we own. I also want to add that I prefer my wildlife and my natural habitats not coated in toxic crude oil. There's only one thing you can do to protect us and that is to deny these permits.

Thank you.

Response GP148-1

Comment acknowledged.

GP149, **Cheatham, North**

Comment GP149-1

I know what oil spills can do to a community. Many of my relatives live in Lynchburg VA, the site of one of our nation's numerous spill disasters. Regardless of precautions and assurances the community, it happened back in 2014, and similar incidents continue to recur throughout the country from time to time. Due to the frequency and long haul of oil trains from the point of extraction through the Columbia River Gorge to the proposed terminal locations in Vancouver and near the WA coast, the potential environmental cost too high to justify the consequences of a disaster. I urge that these terminal siting proposals be declined.

Response GP149-1

Comment acknowledged.

GP150, **Christ, Peter**

Comment GP150-1

It is totally dangerous and unreasonable to allow more oil terminals in Washington State, which will increase train traffic through the beautiful Columbia Gorge. Residents of Gorge communities (Washougal, Camas, Stevenson, Vancouver, etc.) are already subject to almost continuous streams of oil and coal trains. These trains are dangerous and destroy the serenity of the Gorge. Health problems are an issue.

Where there is no overpass, the trains cause delays of traffic which are not only inconvenient but could be a real safety hazard int he case of a fire or police vehicle not being able to cross the train tracks. Please do NOT increase this traffic by building more oil terminals.

The supposed prosperity from these terminals is a red herring. First there are very few workers at each terminal and over time the degradation of the area will decrease the value of the area.

Response GP150-1

Comment acknowledged.

GP151, **Chudy, Cathryn**

Comment GP151-1

EARTH - There is a 30 % to 50 % probability of a Magnitude 6.0 or greater earthquake in the area in the next 50 years - this makes the risk too great for siting oil terminals.

EARTH - The Westway and Imperium Terminal Facilities are built on extremely poor soil of dredged and fill material. A viable terminal would require that significant engineered steel pipe pilings be built between 75 and 130 feet below grade.

Response GP151-1

Comment acknowledged.

Comment GP151-2

SAFETY – The project area from Centralia to Hoquiam lacks a Hazmat team in the immediate vicinity, so a serious spill, explosion, or fire will require a 2-3 hour wait for specialized teams to arrive from Tacoma or Olympia. This is an unacceptable safety risk.

Response GP151-2

Final EIS Chapter 4, Section 4.2.3, *What framework provides responses to an incident?* has been updated to better reflect existing response capabilities and resources are within the study area. Section 4.7, *Impacts on Resources,* has been updated to better reflect potential impacts on emergency service responses from the proposed action. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP151-3

SCOPE - I live in Vancouver and am concerned that the impacts of this project go well beyond Grays Harbor and its communities. The railroad hauling this explosive crude goes right through the heart of two of Washington's largest cities, Spokane and Vancouver. The consequences of an explosive derailment in my community and other rail cities/towns would likely result in many deaths and the destruction of infrastructure. Liability issues and who will pay for whatever losses occur (which could be catastrophic)is not clear and is likely to be at best not determined sufficiently to assist victims should catastrophe occur. The profits are capitalized while losses are socialized at the expense of our state and local residents.

Response GP151-3

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP151-4

SCOPE - I am deeply concerned about the imminent problem of global climate change. One of the major contributors is the use of fossil fuels. These projects involve building out risky infrastructure in a dying industry and is antithetical to seriously addressing the impacts of climate change.

Response GP151-4

Comment acknowledged.

Comment GP151-5

HUMANS - Humans will be affected by spills or burning of oil: Inhalation of vapors resulting from exposure to a spill can cause irritation of the respiratory system. Inhalation of high concentrations of hydrogen sulfide released into the air poses a potential health risk, especially for children and the elderly. Concentrations (well in excess of 10 ppm) could be immediately dangerous to workers due to respiratory paralysis. At levels between 700 and 3,000 ppm, benzene can cause drowsiness, dizziness, rapid heart rate, headaches, tremors, confusion, and unconsciousness. When crude oil is burned it emits chemicals that affect human health.

Response GP151-5

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including potential impacts on human health from inhalation of toxins released during a fire or explosion.

Comment GP151-6

ANIMALS - I am worried about the range of species that could be affected by a significant oil spill. These include: Fish, Crabs, shellfish, double-crested cormorants, pied-billed grebe, belted kingfisher, Caspian tern, Western sandpiper, Dunlin, and Sanderling, Bufflehead ducks and common goldeneyes, common mergansers, harbor seals, sea lions, killer whales, sea turtles, humans! (Yes, we can suffer mucous membrane inflammation from the oil or its fumes), pink-footed shearwater, black footed albatross, northern fulmar, beavers, river otters, bald eagles (can be exposed by feeding on injured or dead fish), clams, mussels, barnacles, snails, algae and plankton, salmonids protected under the Endangered Species Act, migratory birds, frogs, perhaps others unnamed.

Response GP151-6

Draft EIS Chapter 3, Section 3.5.4, *What animals are in the study area*? describes animals and habitats in the study area that could be affected by construction and operation of the proposed action. Chapter 4, Section 4.7, *Impacts on Resources*, describes impacts on animals that could result from potential oil spills, fires, or explosions and clarifies that while impacts would depend on the circumstances of the incident, the resources described in Chapter 3 could be affected.

Comment GP151-7

PLANTS - Plant tissues are fragile and can be damaged or destroyed by Crude oils and heavy refined oils. a typical recovery period for salt marshes (like those at Grays Harbor)would be 3 to 5 years. This affects the base of the estuarine and marine food web, resulting in broader ecological damage. A spill could destroy plants' ability to photosynthesize (which affects air quality as well). Fire from explosions would also result in plant mortality.

Response GP151-7

Impacts on plants that could occur in the event of a spill, fire, or explosion are addressed in Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*; specifically, Section 4.7.1.2, *Plants* (for oils spill impacts) and Section 4.7.2.3, *Plants* (for fire or explosion impacts). Final EIS Section 4.7 has been revised to acknowledge the potential for more lasting impacts as the result of a spill.

GP152, **Clark, Dan**

Comment GP152-1

This is the first DEIS I have read. I am impressed with the effort and thoroughness that went into the making of this document. I do have, however, 3 observation/suggestions: Observation 1: a. I notice that your home webpage identifies climate change as a significant threat. It presents arguments for a number of remedies/mitigations that Washington state might take. b. The DEIS makes no mention of climate change. Since the oil passing through these terminals will be burned somewhere (why else to ship it?), it will certainly contribute to climate change. The question is: how much? Suggestion 1: a. Identity the amount of greenhouse gases likely to be released into the atmosphere over the next 10 years from the burning of the oil contained in all these trains. Also identify the likely reduction from all measures proposed in Washington state to reduce greenhouse gases. The DEIS should present these estimates to permitters so they can compare and properly judge the impact of the activity associated with the use of these terminals to Washington's stated environmental goals. I think we're all coming to the realization that the threat of climate change anywhere (e.g. China) is a threat to climate change everywhere (Washington).

Response GP152-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the likely sources and destinations of crude oil shipped through the proposed facilities.

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, acknowledges that greenhouse gas emissions from the cumulative projects would contribute to global greenhouse gas emissions, which contribute to climate change, and describes the projected impacts of climate change in the Pacific Northwest.

Comment GP152-2

Observation 2: a. There are extensive descriptions of the impacts of train activity (1 to 2 hour delays, etc.) the Grays Harbor area; there are also numerous, useful charts detailing the risk of spills. b. These descriptions, however, are limited to about a 60 miles radius of Grays Harbor. The trains carrying this oil will be traveling the entire length of Washington state—from Spokane through Pasco (my own area) through the Columbia Gorge, Vancouver, and so on. All of the concerns identified in the Grays Harbor area impact every community through which the tanks cars travel. Suggestion 2: Include the total and cumulative negative impacts and risks on communities and natural environments throughout the state that might accrue from the activities directly connected with these two terminals. These impacts need to be included to enable permitters to take the broadest perspective and to make the best decision for our state. Observation 3: Your website shows that the EIS process is partly complete. The Department of Ecology has the opportunity to adjust the DEIS before the final draft. Suggestion 3: This DEIS must include a broader perspective in order to assist the permitters to make the best, most informed decision. There is still time to make

adjustments that include impacts outside the Grays Harbor area. I appreciate all the effort the Washington Department of Ecology has put into this DEIS so far, and I appreciate this opportunity to give input. I urge you to take these suggestions into consideration during the revision process. We all want the best decision possible for our entire state.

Response GP152-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

GP153, **Clark, Sharon**

Comment GP153-1

Please deny the proposed expansion of there 2 companies. The potential risk of spill either in the area or as these products come to the proposed terminals is too high. Additionally, we continuing to encourage and promote the use of fossil fuels in the far East rather than the promotion alternative energy sources, we are harming our own environment through continued drilling, fracking etc. The risk for us both locally and for the planet is too great. Please vote No on these proposals.

Response GP153-1

Comment acknowledged.

GP154, **Clark, Sheri**

Comment GP154-1

I stand with my granddaughter at Titlow beach and we watch the oil trains roll through. She pronounces them “scary” and they are in many ways she doesn’t understand. I have helped to clean oiled sea birds and watched them suffer and die. Really???? Are our only two options to pay the now-chaotic Middle East for petroleum products or else to endanger the public, the oceans, the life on earth by sending what is produced in North America to Asia? Haven’t we learned from the harm done by the Exxon Valdez and the BP spills that one spill is one too many? How can we create a system that protects us and prevents spills when all systems are prone to corruption? Let’s think of a better way: plan C.

Response GP154-1

Comment acknowledged.

GP155, **Clarkson, Jim**

Comment GP155-1

We often visit the Columbia Gorge often along with many like us from all over the world. Tourism is huge because of the almost untouched beauty and serenity--some might say: God’s majesty. Have you ever hiked or driven to a lookout in any part of the Gorge or even enjoyed the river from

Vancouver and points beyond? Must we put industrial enterprises on every piece of land? They bring air pollution, water contamination--someone always finds industry ignoring, accidentally perhaps, or evading EPA regulations. Much of what makes these regions special would be put at risk. A single major oil spill could devastate the enterprises of tourism, the area's maritime economy, productive fisheries, tribal cultures and economies, spectacular coastal waters, sensitive habitats and protected lands and waters in the Columbia River Gorge--not to mention the poor communities along the way that reap none of the so-called benefits but must put up with additional trains and the potential for oil spills. So who's receiving lobbying money to push this through? Let's sell a culture that can live with less growth, so much of which benefits so few. Let's sell the Pacific Northwest as the last bastion free from industrial sprawl.

Response GP155-1

Comment acknowledged.

GP156, **Clendenin, The Rev. Evan Graham**

Comment GP156-1

I believe Jesus sent us a spirit to renew the whole creation, which means working both conservatively and restoratively on behalf of the land, all creatures and the human communities it supports. Our work on behalf our local communities and the land that supports us must look to this image and hope. Shipments of crude oil-by-rail thru Grays Harbor pose multiple risks of irremediable consequence for the well-being and economies related to water and land, as well as to the human communities who reside here. These far outweigh the already small economic gain to be had, which would narrowly benefit a relative few people in this immediate region, with the wealth not shared and invested in the long-term, common good of the region. I pray that the short-sighted efforts at development, and specifically the shipment of crude-oil by rail, be stopped, and more durable and broadly restorative investments in the local common good be pursued.

Response GP156-1

Comment acknowledged.

GP157, **Clifford, Margaret**

Comment GP157-1

Co-Lead Agencies; City of Hoquiam Administrator Brian Shay, and Department of Ecology

Director Maia Bellon ,

I strongly oppose the expansion of crude oil projects in Grays Harbor because they pose extreme risks to human life and the environment while providing little benefit to the citizens of the state. Adequate mitigation is not feasible for this project. For these reasons the permits should be denied.

All three crude oil projects should be considered together before a decision to permit any one project. The risks to public safety and to the environment, the actual economic costs and reduction in the day to day quality of life elements, such as delays of transportation, noise, vibration, air pollution, must be based on the impacts from all projects combined. Expansion of these storage

facilities would not be considered without construction of the Port of Grays Harbor terminal. All of the risks and impacts from transporting crude oil to and from these storage facilities by rail and ship, respectively have to be identified and assessed by this DEIS. SEPA requires related projects to be considered as a whole. Impacts and risks are a function of the volume of crude oil transported over the rails. The entire DEIS risks and impacts are based on a volume of crude oil provided by the proponents. It is critical to understand, however, that there are no restraints on the volume once this project is approved. Over and over in past SEPA documents, we have seen one volume proposed, only to increase when economic incentives prevail. All impacts projected in the DEIS are based upon the proposed volume and therefore, to the extent that this is underestimated so are the actual impacts.

Response GP157-1

Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of cumulative impacts. Refer to the Master Response for Connected or Similar Actions for additional information about the consideration of other projects. Refer to the Master Response for Cumulative Impact Analysis for additional information about the scope of the cumulative impacts analysis.

Comment GP157-2

The DEIS states in several places that mitigation is not possible. Which brings us to a key point- if mitigation is not possible, then why are we considering permitting this proposal? There are extremely high risks and little benefit. This proposal puts the Bowerman Basin, a National Wildlife Refuge and national treasure at risk of not only killing the birds, marine mammals, crab larvae and salmon as a result of a large spill, but contaminating the Harbor and coastal shorelines for perpetuity. It puts thousands of children in the blast zone, not only in Aberdeen and Hoquiam, but all along the route, at risk of incineration. It is true, there is no mitigation for such risks. Therefore these projects must be denied.

As long as mitigation is not possible, this project should not be permitted. The DEIS has tried to explain mitigation for burning train cars. However, it acknowledges that the sole method to deal with tank train fires is to stand back and let them burn.

The addition of storage of this quantity of hazardous oils requires additional terminal capacity. Therefore, this DEIS must examine the primary project risks; delivering crude oil to the harbor via rail and exporting the same by ship. A derailment or major spill would be a catastrophe, most likely including a major fire, and oils that are impossible to clean up once spilled into the Chehalis River or Grays Harbor. This DEIS does not provide for adequate prevention, response, cleanup or mitigation. The reasons for this are basic: it is not possible. If any such measures were possible they would be so costly that these projects would not even be considered.

Response GP157-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 to reduce the likelihood of a spill reaching the environment and the potential impacts if an incident occurs at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water

flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP157-3

This is the one chance to get this decision right. There are a few permits to be issued and the building of tanks that caused the SEPA to be engaged. This SEPA opportunity is the only time that the full rail impacts will be assessed. Even if the trains derail with the attendant horrors, and the corporations fall to bankruptcy as has been described in many scenarios, that won't stop the continuation of this rail traffic. Another company could take over operations of the storage facilities since the construction has already been permitted. This is the one chance to secure our future by saying no to the dangerous and deadly rail traffic upon which this project depends.

The Grays Harbor watershed which drains over 2,500 square miles is the largest system accessible to anadromous fish in Washington State outside the Columbia Basin. The harbor is a national treasure that provides habitat essential to important fish and wildlife populations that support the local and state economy. These oil storage projects will cause irreparable harm to these resources and the dependent economies. If these projects are permitted, future generations will wonder why we traded sustainable fisheries and a tourism economy based on a healthy environment for a crude oil portal.

Sincerely, Margaret Clifford 1617 Columbia St. SW Olympia, WA 98501

Response GP157-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP158, **Cochran, Julia**

Comment GP158-1

Hi. My name is Julia Cochran. I'm from Port Townsend, Washington. I'm a blogger. I'm incredibly uncomfortable in front of an audience. I am here -- I retired in June from being a classified employee in the public school district because I wanted the children who I was teaching, the 37 teenagers I've raised, my biochild, to have a future because I believe climate change is real.

And the scientists all say, leave it in the ground. So that's (inaudible.) (Inaudible) says no matter what all these people are saying, agree with them, but leave it in the ground.

Anything that is taken out of the ground and putting out there is going to kill our children, our grandchildren, our great-grandchildren, and then there won't by any more after that. So please, leave it in the ground.

Response GP158-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP159, **Cole, Robert**

Comment GP159-1

I strongly oppose both of these projects. I do not want long oil trains traveling near where I live. I oppose exporting oil and coal to Asian countries because of the very negative effect on climate change. I care deeply about the world my grandchildren will live in, and I don't want to support more fossil fuel going to Asia. I understand that the people of Grays Harbor County are strongly opposed to this project. Your DEIS must consider what the local people want, since they bear the bulk of burden of oil trains.

Response GP159-1

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP160, **Connally, Patricia**

Comment GP160-1

My name is Patricia Connally. I'm against the proposal for the crude oil transit. I was born and raised on the harbor, raised by commercial fisherman. My whole family has lived and basically been raised by fishing, the fishing industry, and most of my friends and family have too.

And I just think the negative impacts of transporting crude oil is way too risky for how many people really rely on the natural resources that this town provides. We just really can't risk it, so I do not support it. Thank you.

Response GP160-1

Comment acknowledged.

GP161, **Connor, Robert**

Comment GP161-1

I'm opposed to expanding terminals!

Response GP161-1

Comment acknowledged.

GP162, **Cool, Debbie**

Comment GP162-1

To whom it may concern, I moved to Montesano eighteen years ago to work and live in one of the most beautiful and pristine areas of the world. The rain forest is our backyard, the oceans and rivers our food source. Here the pace is slower, people depend on their backyard gardens, and recreation is something you do outdoors. Having read the DEIS I am particularly concerned that you believe you can adequately mitigate for noise, pollution, natural disasters, and human error. Your report is saying that the State of Washington believes the hazards to the people along the train route and in particular to Grays Harbor residents is outweighed by the income the state estimates it will take in. For me, the balance rests on the quality of life that will be impacted. You cannot mitigate enough to overcome the barriers to health, safety and the environment. It's time to end US reliance on oil. No oil/no trains. Sincerely, Debbie Cool

Response GP162-1

Comment acknowledged.

GP163, **Cornelison, Peter**

Comment GP163-1

Hello, my name is Peter Cornelison. I'm from Hood River. I'm on the Hood River City Council and I represent the City of Hood River in my remarks today.

Our council passed a resolution in 2014 opposing oil trains in the Columbia River Gorge National Scenic Area. And I would like to describe two of the impacts in our region from additional oil trains, such as we put forth by this proposal.

We have two major concerns. Number one is fire. You may have heard of the winds that happen both in the summer and winter. In the Columbia Gorge they're quite strong, 30 to 40 mile-an-hour winds at times.

An oil train that caught fire in the Gorge could send a fire downwind or upwind and at a very fast rate through the Gorge threatening both sides of the river, Oregon and Washington, because the sparks would easily go over to the other side of the river.

The other sort of nightmare scenario is one that was put forth by the Army Corps of Engineers, which is if an oil spill happens near one of the dams, the high end hydrocarbons go down and impregnate into the concrete of the fish ladders. The salmon would no longer use those fish ladders.

So either one of those scenarios, fire or oil spill, presents with real dire consequence, and we hope that this proposal will be rejected.

Thank you.

Response GP163-1

Refer to the Master Response for Geographic Scope of the EIS and the Master Response for Environmental Health and Safety Analysis.

GP164, **Corr, Nancy**

Comment GP164-1

I`m opposed to the oil transport terminals being proposed or increased in the Grays Harbor area, as the oil is not for use locally, but to be exported and of no value to anyone but the oil companies.

Response GP164-1

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP165, **Covert-Bowlds, Chris**

Comment GP165-1

Name Chris Covert-Bowlds, M.D.
Organization St. Patrick's Catholic Church Social Justice Committee
City/State/Zip Seattle, WA 98103

Coal & oil export terminals are a threat to local and global health & environmental safety. Corporations that profit from these projects have not been paying the full price of such projects. Please consider all effects, including on salmon, people around the world, birds, the entire ecosystem. This could devastate the local economy, dependent on healthy fisheries.

Response GP165-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP166, **Cozzetto, Bonnie**

Comment GP166-1

My Name is Bonnie Buchanan-Cozzetto & my Grandparents, on both sides, immigrated to the US Drectly to Grays Harbor ~ They came here for the Beauty & OutDoor Splender this area had to offer! My Father was a Boom Foreman, walking on logs floating in our water ways, always Loving & Respecting the Outdoor Immenities, this area had to offer! Those jobs, along with many other Wood Product related Jobs are gone now, but the pristine waterways & wildlife remain. The Fishing, Crabbing, Clambing & Oaster Bed are also still here and I believe chancing losing those things is NOT worth anthing Imperium & Westway might say our area might Gain. Grays Harbor has been through some 'Rocky Times' over the last 15yrs, having said that, "That is NO EXCUSE to disrespect our Beautiful Area. Chancing Oil Contamination &/or Explosions & Fires caused by Future Rail Accidents w/Oil Contents on Trains! Yes, Gray Harbor Economy may gain a few badly needed jobs, but overall

the damage that rail accident may cause are just not worth the risk! Please Respct this Beautiful Enviroment & Don't Allow Permitting of fthios Project!

Response GP166-1

Comment acknowledged.

GP167, **Crawford, Dennis**

Comment GP167-1

My name is Dennis Crawford. As an Emergency Management Specialist from Western Washington, I wish to comment on the dangers of the Westway and Imperium expansion projects as currently conceived. The location of these projects next to the bay is most concerning as they relate to the predicted seismic shift in the Cascadia Fault running a few miles off the Pacific Coast.

The Washington Department of Emergency Management has held numerous workshops to help prepare the public for a large earthquake with a magnitude of up to nine that has a ten percent chance of occurring in the next 15 years accompanied along the coast with a possible 80-foot tsunami.

The devastation that will occur at some point in the future will be massive along the coast. It will be much more destructive for the environment and coastal marine life if there is spillage from ruptured oil, gas, and chemical tanks situated on soils that are subject to liquefaction during an earthquake.

The proposed projects are located on soils which are known to liquefy in large earthquakes. As an alternative -- if there is to be one, an alternative would be to select sites for these where they would be on a nearby hillside above 80 feet where the underlying material is igneous rock, less subjective to fissures and more stable in earthquakes.

To move the stored oil products from the tanks to the harbor for loading would be accomplished with pipelines that would automatically close when an earthquake occurs.

Thank you.

Response GP167-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

As noted in the Master Response for Project Objectives and Alternatives, the EIS analyzes the potential impacts of a private project on a specific site; the objectives and proposal are defined by the applicant.

GP168, **Crawford, Dennis PhD**

Comment GP168-1

As an Emergency Management Specialist from Western Washington, I wish to comment on the dangers related to the Westway and Imperium Expansion Projects as currently conceived.

The location of these projects next to the bay is most concerning as they relate to the predicted seismic shift in the Cascadia fault running a few miles off the Pacific Coast. The Washington Department of Emergency Management has held numerable workshops to help prepare the public for a large earthquake with a magnitude of up to a nine that has a ten percent chance of occurring in the next 15 years accompanied along the coast with a possible 80-foot tsunami. The devastation that will occur at some point in the future will be massive along the coast.

It will be much more destructive of the environment and coastal marine life if there is spillage from ruptured oil, gas, and chemical tanks situated on soils that are subject to liquefaction during an earthquake. The proposed projects are located on soils which are known to liquefy in large earthquakes.

An alternative to the sites selected for these projects would be on nearby hills above 80 feet where the underlying material is igneous rock, less subject to fissures and more stable in earthquakes.

To move the stored oil products from the tanks to the harbor for loading could be accomplished with pipelines that would automatically close when an earthquake occurred.

Submitted by Dennis Crawford, PhD, 2580 Crest Avenue, Port Townsend, Washington 98368.

Response GP168-1

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

GP169, **Culhane, Tom**

Comment GP169-1

I would like to go on record as strongly opposing both the Westway and Imperium Expansion Projects. My main objections all relate to the insanity of shipping such large quantities of crude oil by rail. Obviously the proposed expanded use of the rail lines would increase the vibration and noise experienced by those people living near the line, and the backed up traffic at railroad crossings would cripple the mobility of locals and emergency responders.

Then there is the real possibility of a spill of Bakken crude oil – extremely flammable fuel with the incendiary potential to destroy large swaths of the cities and towns it is travelling through. Explosions of Bakken Crude oil have occurred and if one of these takes place near a community, either by chance or due to a terrorist act, many people would die and there would be tremendous destruction. No adequate mitigation for these problems was proposed, truthfully because no adequate mitigation for these concerns are possible.

From a western Washington perspective the social costs and economic liability of these projects would far outweigh any gains, and it would be a travesty if any of the government agencies involved were to allow either of these proposals to move forward.

Response GP169-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP170, **Cummings, Roger**

Comment GP170-1

I wish to express my complete opposition to these projects for reasons already stated by public safety experts. *These projects are in a highly seismic region of the world subject to quake and tsunami risk.

These projects only promote increased fossil fuel consumption and do nothing to mitigate resultant climate change.

Existing infrastructure (bridges, rail systems) are inadequate to manage the high load of rail traffic that would result and long rails trains will impact response time for local emergency vehicles by blocking traffic routes for extended lengths of time.

Effective response plans in an emergency are lacking and inadequate.

The projects have potential, disastrous environmental risks to wildness areas and waterways and to natural fish runs and ocean harvest. *The industry promoting these projects have poor record in preventing spills or even enhancing local economies. I stand with many the citizens of this state against this enterprise. The risk of harm is far to much. Thank you.

Response GP170-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities.

GP171, **Cunningham, Lynda**

Comment GP171-1

While Grays Harbor might seem far from the Columbia Gorge, the potentially explosive Bakken crude-oil trains serviced by these terminals would travel through, and directly threaten, the Columbia River Gorge National Scenic Area. Why are we allowing these dangerous crude oil trains to go even close to such a national treasure as our beautiful Columbia Gorge. Please, let us move forward and out of the old days into cleaner, healthier energy choices. Thank you.

Response GP171-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

GP172, **Curry, Stephen**

Comment GP172-1

Westway and lmperium Expansion Projects EIS c/o ICF International 710 Second Ave., Suite 510 Seattle, WA 98104

My name is Stephen L. Curry. I currently reside at: 5039 Brenner Rd. NW, Olympia, Washing ton, 98502.

The following is my testimony regarding both Westway and lmperium Expansion Project Draft Environmental Impact Statements, both affecting Grays Harbor and the Chehalis River estuary.

I am a Natural Resources Scientist, forest inventory specialist, retiree from the WA State Dept. of Natural Resources. While a resident of Aberdeen, Washington between 1971 and 1984 I was employed by Boise Cascade Corp. whose office was located at 1321 Sargent Blvd., the present location of the Rotary Log Pavilion. This location is adjacent to the southwestern boundary of Think-of-Me hill and the eastern boundary of the Olympic Gateway Plaza Shopping Mall.

Think-of-Me Hill Concern.

Think-of-Me hill has a notorious history of sliding which I witnessed many times over the years. Sliding is a concern because the main and only highway into Aberdeen is from the east. Both the highway and the rail line are sandwiched between the Chehalis river and Think-of-Me hill. The Think-of-Me hill slides have been mitigated to some extent over the years but not eliminated. Storms with heavy rainfall and/or coupled with an earthquake event would create a catastrophic, explosive slide if an oil train were passing through. With several trains projected to pass through per day the risk is high. Extensive slope stability studies on Think-of-Me hill with the above in mind must be done to even consider transporting hazardous materials through this corridor.

Response GP172-1

Based on the recent landslide occurrences that exceeded the predicted landslide flow distance, Final EIS Chapter 3, Section 3.1, *Earth*, reflects the acknowledgement of the distance that debris flow has traveled in the past. Despite the recent landslide events that exceeded the predicted landslide flow distances, the rail and road segments for 12 of the 19 miles described are estimated to have the same level of risk for interruption by landslides as previously described in the Draft EIS.

Comment GP172-2

Olympic Gateway Plaza Shopping Mall Concern.

An additional concern is the location of the Olympic Gateway Plaza Shopping Mall. Westward bound trains with up to 120 cars full of explosive contents, if stalled, would block all cars and people from evacuating the shopping mall. The Chehalis river blocks escape to the south, the Wishkah river blocks escape to the southwest, the rail line blocks escape to the northwest, north, and east. This concern alone should be reason enough to deny permits for both projects.

Response GP172-2

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Comment GP172-3

Oil Storage Tank Concerns.

Increased recent knowledge regarding the Cascadia fault suggests that there is a 10 percent chance of experiencing a magnitude 9 earthquake in the next 15 years. Emergency planners in Washington and Oregon are incorporating this information in their planning. The Department of Ecology needs to decide whether it likewise will include this information in their decision criteria. Of great concern is the location of existing and proposed additional oil storage tanks. That location sits on unstable fill that is subject to liquefaction resulting in violent shaking and tank structural failure during an earthquake. In addition to the shaking there is the danger of a tsunami wave overtopping the pad the tanks sit on and destroying the tanks.

Response GP172-3

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment GP172-4

I attended the early afternoon 'Westway and lmperium Expansion Project DEIS' hearing in Aberdeen on October 8, 2015. Speaker number 3, Dennis Crawford, an emergency management specialist, testified about his concern regarding these very issues. Speaker number 21, Arney Martin of Hoquiam, testified regarding the inadequacy of 75' piling lengths not reaching stable bed rock and therefore being ineffective. Even with adequate piling length the overtopping issue remains.

Response GP172-4

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP172-5

Oregon Field Guide, an Oregon PBS program, produced and aired an excellent program, "Unprepared: An Oregon Field Guide Special", regarding these issues on October 1, 2015 and what Oregonians need to do to mitigate some of these catastrophic dangers. Portland, Oregon is in the unfortunate position of having a huge petroleum tank farm sitting on fill subject to liquefaction. The tank farm supplies most of western Oregon with petroleum products. Tank destruction due to earthquake would not only impact supply of petroleum to western Oregon but release an unimaginable amount of oil down the Columbia River and out to sea and along the Pacific cost impacting birds and wildlife.

Response GP172-5

Comment acknowledged.

Comment GP172-6

We in Washington have a choice and an obligation not to add to the problem and instead pro vide an oil free habitat to the coastal creatures that need it.

<u>WA DOE Mission and Responsibility</u>.

A search of the the WA DOE web site reveals its Mission/Vision Statement which states: "The mission of the Department of Ecology is to protect, preserve and enhance Washington's environment, and promote the wise management of our air, land and water for the benefit of current

and future generations. In order to fulfill our mission and move Washington forward in a global economy, the Department of Ecology has three goals: to prevent pollution, clean up pollution, and support sustainable communities and natural resources."

The WA DOE web site also includes sections related to: Climate Adaption Knowledge Exchange (CAKE) and Institute for Catastrophic Loss Reduction, a Canadian entity.

WA DOE's mission statement and sensitivity to preventing catastrophic environment and human loss are laudable. There is no mention regarding supplying jobs or keeping corporations profitable in WA DOE's mission statement. To be consistent with these stated values and goals, both Westway and lmperium Expansion Projects should be denied.

Thank you for the opportunity to render testimony.

Sincerely, Stephen L. Curry

5039 Brenner Rd. NW

Olympia, Washington, 98502

360-556-6815

Response GP172-6

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP173, **Curtz, Thad**

Comment GP173-1

My wife and I love to go see the migrating shorebirds in Bowerman Basin. There are only a limited number of these stopovers sites available on the flyway. Please don't approve these projects and expose that important site to the risk of a major oil spill. Yours, Thad Curtz, Ph.D.

Response GP173-1

Comment acknowledged.

GP174, **D, Dave**

Comment GP174-1

I think it's great to see the harbor get more opportunities for family wage jobs. It seems to me that those that are oppose to oil, factories or any other jobs that pay well are the people paying minimum wages to the majority of there employees. I don't remember a comment period when the Quinault tribe decide to bury large diesel and gas tanks in the bank of the Wishka river? As far as oil tankers I think we need the business. Make safety a priority but stop blocking the ports ability to grow. We have lost hundreds of family wage jobs in grays harbor and I don't think tourism or casinos paying minimum wages is going to turn things around. We need to stand up against these people putting their special interest ahead of the common good these industries can bring to us. I have three

children raised here on the harbor and they are all looking to go elsewhere because of the lack of good jobs and wages. We need jobs. Stop killing good opportunities or all our children will be leaving.

Response GP174-1

Comment acknowledged.

GP175, **Dahlquist, Brynn**

Comment GP175-1

My name is Brynn Dahlquist. I'm from Washington, Klickitat County, and I'm here on behalf of all the tiny towns that exist in the Columbia River Gorge along the tracks. I spent most of my life in those small towns and all of them grew up because the tracks were there, which means those tracks run through downtown.

The one-mile radius that is referred to as the blast zone is this town. There are schools and grocery stores, Main Street City Hall. Darn near everything is within a mile of the tracks and that is not addressed in the DEIS.

Response GP175-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP175-2

It states in the job assessment dozens of job loss are basically null and void. It will be no jobs loss.

Response GP175-2

Draft EIS Chapter 7, Section 7.1.4.2, *Proposed Action,* describes the estimated impacts on employment associated with the construction and operation of the proposed action, including the number of direct, indirect, and induced jobs that would be generated as a result of the project.

Comment GP175-3

In the event of an accident, which is bound to happen, that the Department of Transportation said ten trains on average will derail each year if the current rate of traffic stays the same.

There is no assessment at all for the fact if there is a disaster. We all have volunteer fire departments. We can't afford the necessary machinery, the necessary chemicals, the necessary anything to stop destruction in the event of a fire. Who is going to cover any of the issues that arise? It's not shown in the DEIS.

Response GP175-3

Final EIS Chapter 4, Section 4.2.3, *What framework provides responses to an incident?* has been updated to better reflect existing response capabilities and resources in the study area. Section 4.5.3,

What mitigation measures would reduce impacts related to rail transport? proposes additional mitigation measures to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional fire-fighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

Comment GP175-4

These small towns, it all comes down to recreation. People come to recreate, sailboarding, kiteboarding, windsurfing. In the event of an oil spill, that is not covered. Jobs would be lost. Recreation is why people come now. None of those are covered in the Draft Environmental Impact Statement. The issues need to be addressed in order for the proposals. . . .

Thank you.

Response GP175-4

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources,* describes potential impacts on recreation as a result of an oil spill, fire, or explosion.

GP176, **Dahlquist, Daeuthen**

Comment GP176-1

Hi, my name is Daeuthen Dahlquist. I'm 11 years old from a small town in the Columbia Gorge, Klickitat County. It's important that we don't act hastily from a point of instant gratification, but that we reflect upon the longer consequences of what could happen. The DEIS needs to consider all the threatened and endangered species and the habitat or lifestyle we are destroying, oil train.

According to the National Columbia River Gorge Natural Scenic Area Active Management Plan, there are 114 state and federally recognized endangered or threatened species where I live. The marine and rail transportation study only -- reports that only 14 percent at best of an oil spill is recoverable. That means 86 percent coming to steelhead and their spawning grounds. Eighty-six percent of the bald eagles, and the habitat of the Osprey.

The DEIS needs to address the necessity of this area for species other than humans. The economic cost/benefit analysis of the DEIS does not recognize the negative impacts of an explosion, spill, or derailment. Forty percent of my town -- of our town is employed by an industry directly on the tracks. In the event of an explosion I guarantee jobs will be lost, lives will be lost.

Response GP176-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Comment GP176-2

Lastly, I recognize climate change is a moral decision. It requires to look past facts and into your conscience. I am asking you to do what you feel is just, only not for this moment but future generations, for the earth, the animals, and the youth of the world.

We need to stop burning, and drilling, and using the planet as a commodity. Our future, my future is sacred. Thank you for being responsible for my future.

Response GP176-2

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP177, **Dale, Garry**

Comment GP177-1

Department of Ecology and City of Hoquiam,

RE: Westway and Imperium Oil Expansion Projects DEISs

State of Washington through Washington State Department of Ecology and City of Hoquiam as SEPA Leads are responsible for accurate presentation of direct, indirect and cumulative impacts of these proposals as well as mitigation measures to lessen impacts.

The State and City are responsible for Public Health Safety and Welfare and protection of air quality, water quality, and public resources and human health through any permits that might be issued for these projects at completion of environmental review. Since the potential impacts from both projects are similar, I will offer one comment letter and submit it for both projects.

Since projects are on previously developed lands, greater potential for impacts are off-site and secondary in nature. They include potential risks of accident, spills, derailment that exists because of distance of volatile Bakken oil and/or jet fuel on rail line infrastructure that is aged, crosses waters and hydric soils and in areas that experience earthquakes.

I'm writing because **I oppose** the proposed Westway and Imperium bulk liquid storage terminal expansion projects proposed at the Port of Grays Harbor.

I believe that the risk posed by increased oil traffic, particularly by dangerous oil trains running through our communities, is unacceptable, and the Draft EIS doesn't go far enough to consider those and other risks. In particular:

The Draft EIS does not adequately address the impacts to the rail communities and water bodies in the extended area.

The DEIS inexplicably only studied the last 59 miles -- less than 5% -- of the route.

The last few years have seen an enormous expansion in the amount of highly volatile crude oil shipped by rail, and there has been a corresponding spike in the number of derailments, fires and explosions. State and federal regulation of crude-by-rail transport doesn't go nearly far enough, so

more oil train traffic through our communities increases the risk of loss of life, property damage, and pollution from oil spills.

Response GP177-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Comment GP177-2

The Draft EIS also failed to adequately consider a number of other important issues, including, but not limited to:

Why is Bakken crude oil more prone to ignite than motor oil?

The potential of even low-speed train car derailments, punctures, spills, fires and explosions.

Risks to endangered or threatened species.

Statewide traffic impacts especially first responder delays.

Full statewide economic impacts of an oil train disaster.

Inadequate preparedness of first responders.

Adequacy of insurance. You assume in the event of an accident, responsible parties will be able to pay for damages and do so in a timely manner.

Rail inspection failures.

Risks of fire spreading beyond one train car or oil storage tank in the event of a leak, fire, or explosion.

Risks posed by outdated and insufficient oil barge regulations.

How this proposal would increase Washington State's contribution to carbon pollution and climate change.

Please also do a full accounting of the flaring and fugitive emissions of greenhouse gases in the oil fields, in the gathering areas, in the loading areas, and from the tank cars during transit and unloading.

I urge you to ensure that the Final EIS makes a more comprehensive and rigorous analysis of all aspects of safety, environmental and economic risks posed by these proposed oil terminal expansions and the increased rail and barge traffic that they would enable. **These proposals are guaranteed to produce significant and unavoidable adverse impacts to our communities, our state, or our environment**. Because of this, the permits should be **denied outright**.

Thank you.

Garry Dale

Response GP177-2

Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils.

As noted in Master Response for Environmental Health and Safety Analysis, the risk assessment considers the potential for oil spills, fires, and explosions of various sizes regardless of the specific causal events.

Risks to endangered and threatened species are addressed in Final EIS Chapter 3, Section 3.4, *Plants*, and Chapter 4, Section 4.7, *Impacts on Resources*.

Refer to Response to Comment GP177-1 for information about the analysis of impacts in the extended study area.

Refer to the following Master Responses:

- Emergency Response and Planning Gaps
- Environmental Health and Safety Analysis
- Purpose and Focus of the EIS
- Crude Oil Extraction, Transport, and Combustion

GP178, **Dale, Garry**

Comment GP178-1

Thank you for giving me an opportunity to comment on the DEIS for the Westway and Imperium proposed oil-by-rail terminals. Much of what makes Grays Harbor special would be at risk if these proposals were permitted. A narrow, shallow shipping channel and strong currents put Grays Harbor at high risk of an oil spill. There is no way to mitigate the risks and dangers of these crude oil terminals. The DEIS doesn't identify insurance coverage for these trains.

This leaves important questions unanswered: Is it even possible for an oil shipper to get the coverage it needs for worst-case scenarios? What assurance is there that the companies involved will not declare bankruptcy?

Response GP178-1

Draft EIS Chapter 4, *Environmental Health and Safety*, Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP178-2

The DEIS barely touches on threats to Tribes, especially to the potential damage of traditional fi?shing areas from a spill into the Chehalis River and Grays Harbor

Response GP178-2

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes potential impacts on tribal resources as a result of an oil spill. The Final EIS section further clarifies these potential impacts.

Comment GP178-3

There is also a absence in the DEIS to address the concerns of the Washington Dungeness Crab Fishermen's Association, Coalition of Coastal Fisheries, Westport Charterboat Association and the Willapa/Grays Harbor Oysterman's Association. I strongly object to the exclusion of scoping comments by the marine industries and the Quinault Indian Nation in the DEIS. I have been a farm owner in the Wynoochee Valley for 15 years and a fisheries biologist who worked with the marine industry for 13 years. I truly believe that this proposal would put the health and safety of the people, the local economy and the resources that we all depend on at serious risk. Again, there is NO WAY to mitigate the risks and dangers of these crude oil terminals. The permits must be denied!!

Response GP178-3

The co-leads reviewed and considered all scoping comments. Final EIS Appendix A, *Scoping Comments*, provides a catalog of all comments received during the formal scoping period.

GP179, **Dale, Garry**

Comment GP179-1

Questionable assumptions in the DEIS's

1.In your economic summary, you make a chart of economic benefits and costs assuming there would be No job losses and no accidents.

Response GP179-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2, has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP179-2

2. You assume sparks are almost absent at 25 MPH.

Response GP179-2

Refer to the Master Response for Risk Assessment Methods for a discussion about the assumptions, data sources, and methods used in the assessment of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*.

Comment GP179-3

3. You assume the impacts to property values of an oil train , is the same as the impacts to property value of a general freight train.

Response GP179-3

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

GP180, **Damike, Tammy**

Comment GP180-1

Continuing with Candy's letter. Our own people are becoming addicts and need treatment but they continue to be arrested and sent to jail while the two perpetrators of the crimes keep slipping away, only to bring more drugs, guns, and crime.

I can't even begin to describe to you the heaviness in my heart, having buried my brother's beautiful 28-year-old step-daughter just a few weeks ago who could not stop using heroine, which destroyed her body so much we had to have a closed casket.

We found my little cousin's body in the lake this spring. He disappeared last fall after last being seen with two known MS-13 gang members. His death was ruled an accidental drowning and the case was open and shut.

Just this past week two armed robberies occurred at two separate downtown businesses on our little main street.

Take these words that have been read here today and quadruple the horrors and maybe then you might be able to begin to get a sense of what's happening to us in our communities on Fort Berthold in North Dakota as a direct result of our country's addiction to fossil fuels and fracking.

It's sick and it's sad, and I would never in my life wish this kind of horror on anyone else, if you have a choice to do what you can do now to help us stop this kind of devastation from spreading. We need help. Will you help us?

Do not support fracking. The social and environmental impacts from it are negatively life altering, and those impacts are spreading across this country like a disease. Please, from one compassionate human being to another, help us and do not support fracking. (Speaking Indian). Thank you.

Response GP180-1

Comment acknowledged.

GP181, **Davis, Edith**

Comment GP181-1

Nov. 15th 2015

Dear Gray's Harbor Folks—

Recently, I was enjoying a beautiful sunny day in Cankeek Park in NW Seattle. Standing close to the beach, I observed several freight trains pass by and was reminded of the proposed expansion of oil terminals in Grays Harbor and Anacortes. Exposing the citizens of this NW community to serious problems such as train derailments, and leaking fossil fuels is a risk not worth taking in my opinion.

I would implore you, before our desire for economic gain gets galloping ahead of our heads and hearts, to bring sound judgement and prudence to the fore...let the innovative and visionary spirit of the Pacific Northwest guide us in seeing that there can be another way to live, grow, and prosper without our continuing dependence on fossil fuels.

Thank you for your consideration.

All the best,

Edith Davis

Response GP181-1

Comment acknowledged.

GP182, **Davis, Kelley**

Comment GP182-1

I live in the Columbia River Gorge, and am very active in the Pacific Crest Trail Association as a caretaker for a section of the PCT. I see the oil and coal trains every day, and am very concerned about the impact they have on this special, wild place I call home. We have a fragile and magical environment here as a National Scenic Area, offering recreation opportunities and places to find refuge away from city life. I feel it is our duty to protect this special place and all of the valuable creatures that live here, including the Columbia River salmon. Please, please do not allow these hazardous oil and coal trains to continue polluting the Gorge!

Response GP182-1

Comment acknowledged.

GP183, **Davis, Major Tom E.**

Comment GP183-1

My name is Major Tom E. Davis. I live at 604 3rd Avenue in Aberdeen, 98520. And I have resided within Grays Harbor County for just under 30 years. I have experience with oil and gas leasing of tribal and individual trust properties in Oklahoma. I am a tribal member of the Choctaw Nation of Oklahoma. I'm a tribal elder and I used to monitor oil and gas leasing within the state of Oklahoma for the Federal Government Department of Interior.

What concerns me about this public hearing—I hear a lot of people talking about concerns of damage to life and property. But what concerns me more so is these public hearings. Are they really a guise to help promote something and we're just attempting to pretend that we're getting due process as a community? And while allowing lobbyists and the big money people to negotiate deals, we just use these public hearings as a pretext?

What I'm wondering is if we really will make any difference within our community. I hope that we do. I don't mean to sound like a pessimist, but that's really my concern, is who has the big bucks compared to the individual citizens that just want to look out for their families, community, and properties.

Now, once upon a time, there was an attorney general, Christine Gregoire, governor of the State of Washington, who said, We, the people of the State of Washington, do not yield our sovereignty to our elected officials, our hired hands. It seems like we haven't really yielded our sovereignty, but we just don't have the big bucks of the corporations.

And so I guess in closing, what I would like to say is make sure that the silent majority or the concerned citizens have as much weight as the lobbyists and big money corporations. Otherwise, this would create an unlevel playing field for the citizens of the state of Washington and our elected officials will have failed their citizens.

Thank you so much for your time. I do appreciate the opportunity.

Response GP183-1

Comment acknowledged.

GP184, **Davis, Tom**

Comment GP184-1

My name is Tom Davis. And have bad hearing, so if I bust your eardrums, it’s because I can’t hear you. I’m a member over there in Choctaw Nation in Oklahoma, tribal elder. I’ve lived in the area for 30 years. And I can’t say anything any better than what’s been said. Hopefully the right folks will get the right message.

But what I would like to do is present it in a different twist, if I may, and read a letter sent to me from Congressman Derek Kilmer. And I will do this in the remaining time frame, but if I don’t, and I will give you a copy.

Dear Mr. Davis, thank you for contacting me about H.R.702, a bill that will lift a 40-year ban on U.S. crude oil exports. I appreciate you taking your time sharing your thoughts with me. Like you, one of the reasons I enjoy living in the region is because I value the richness of our environment.

As a man, I feel strongly that we have an obligation to be responsible stewards to our environment so we can maintain the pristine beauty and diversified wildlife that the Olympic Peninsula is known for.

Recent years have seen extensive expansion of oil and gas extraction efforts in our nation. While some of these efforts have expanded energy supplies, there are legitimate concerns regarding the impact these activities has had on our national environment.

I've got about another page to read. I'm not going to make it, so what I'm going to say is maybe instead of bashing -- to be continued perhaps.

Thank you for your time.

Response GP184-1

Comment acknowledged.

GP185, **Dawning, Desdra**

Comment GP185-1

My name is Desdra Dawning and I come from Olympia Washington.

I am here today to appeal to your better instincts and your deeper wisdom and intelligence.

The process that has so far been taken to determine the environmental impact of crude oil terminals in Grays Harbor is terribly incomplete. Much has been left unexamined and the alarming safety record of explosive crude oil train derailments in North America in recent years has been largely discounted.

I remember seeing footage of the horrible devastation that happened to the people of lac-Megantic, Quebec just two years ago when an oil train careened into their downtown, exploded, and wiped out many blocks of homes and businesses, killing 47 people in its fiery wake. My heart wept for them.

Many people live along the train routes for these terminals proposed for Grays Harbor, from Hoquiam to Centralia, and all the way to the oil sources in North Dakota and Alberta, Canada. With about 16 crude oil trains passing them every week, it would only be a matter of time before something similar or worse would happen to them.

Response GP185-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an

incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP185-2

The habit of relying on oil and coal for our energy needs is fast becoming a dinosaur. It is time to get creative, wise up and begin embracing renewable sources to meet our energy needs and respond to global warming. We need to shift into the perspective of the wise elders of First Nations People and start considering how our decisions today will affect our descendants 7 generations from now. Will we be their conscious, intelligent, foresighted ancestors, or will our decisions bring more destruction and decay to an already-suffering planet?

Thank you for considering my thoughts. Please take them into your heart and do what you know to be right.

Response GP185-2

Comment acknowledged.

GP186, **Day, John**

Comment GP186-1

My name is John Day. I live in Seattle and am retired. I am a lifetime resident of Washington State. I am retired from the marine repair and services industry.

I am very concerned about the vulnerability of the proposed oil terminal projects in SW WA and the close proximity of the rail lines and storage terminals to our state's waterways. The DEIS does not do very good job of describing the risks along the Columbia River rail corridor and in particular the risk to these projects from Tsunami and Earthquake in Grays Harbor and along our coast. A recently released study from Oregon State University cites a 40% chance of a major earthquake along the Cascadia Subduction Zone during the next 50 years. The quake could have a similar intensity to the Japanese quake in 2011. The prescription for fortification of the terminal sites will not measure up to the destruction that would follow such an event. The DEIS states on numerous occasions that the risks from these projects cannot be mitigated--if the risks cannot be mitigated the projects should not be permitted.

Response GP186-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP187, **Dayton, Gary**

Comment GP187-1

Name: Gary Dayton
Organization:
City/State/Zip: Vancouver, WA, 98665

This afternoon I listened to 35 speakers speak against the proposed oil terminal and trains. They spoke about the chance of a train accident and the disastrous effects on the environment and the communities. They spoke about the chance of a major earthquake and how it would damage trains and terminals. They spoke about how few jobs would be created and how the oil companies and their insurors [sic] do not carry sufficient coverage to pay for the damages or the enormous price of the cleanup. I agree with all of them. Now I will write about something that was not talked about. I don't like to but I believe it must be said. These trains and terminals could become a target for terrorists. If you think this is absurd then please consider these 3 questions.

1. Is the United States at war with ISIS and Al Quada? [sic]

2. Do you believe ISIS and Al Quaida are at war with the United States?

3. Are there other terrorist groups who hate the United States?

If we are at war with terrorism and I believe we are then from a military standpoint oil trains are long, slow, highly flammable, unguarded, targets. Terminals, refineries and oil fields are large stationary targets. If you believe terrorists groups don't have the ability to attack then I would like to remind you that 14 years ago terrorists captured 4 civilian airliners in flight and rammed them into 3 buildings. A feat far more difficult than blowing up a few trains or setting fire to a terminal.

Response GP187-1

Comment acknowledged.

GP188, **Deakin, Dave**

Comment GP188-1

We need growth in the harbor most of our jobs at least the ones that pay good have gone away like the timber industries. if you were trying to open a new mill we would have the same protesters fighting that. My point is this we need to allow expansions of these companies and others. We can't all work for minimum wages and expect our community to survive. We all know that oil is flammable and yes sometimes it even explodes in very rare cases. So does gas, propane and saw dust. Safety is what I'm concerned about we need to allow the companies that want to ship oil make the upgrades to our aging rails. Some of the bridges are so rusted that I don't even fish under them due to the rusted out beams. But who's got the money to fix the problem? big oil. I say fix the rails, use safe tank cars and if you have any openings give me a call I have three people unemployed in my house that want to work for more than minimum wages. Pump away and stop listening to people who don't pay taxes to our county, port or city. We need good jobs bring in a couple refineries too I'm serious thanks for your time

Response GP188-1

Comment acknowledged.

GP189, Denison, Marcia (Pacific Rainforest Wildlife Guardians)

Comment GP189-1

The EIS fails to say that the areas beyond the proposed terminals are prone to severe flooding, like earlier this month. The possibility of loaded tank cars floating away from the tracks and causing a spill is great in low areas the tracks pass through. Thank you.

Response GP189-1

Draft EIS Chapter 3, Section 3.3.4.4, *Floodplains*, lists the locations of floodplains along the Grays Harbor shoreline and along the PS&P rail line. The floodplain information is based on the Federal Emergency Management Agency's (FEMA) floodplain mapping, which is based on an extensive floodplain study. FEMA's Federal Insurance Rate Maps are the official maps on which FEMA delineates the special flood hazard areas for regulatory purposes under the National Flood Insurance Program. Special flood hazard areas are also known as the 100-year floodplain, which are areas that have a 1% annual chance of flooding. A special flood hazard area (or 100-year floodplain) is the area where the National Flood Insurance Program floodplain management regulations must be enforced.

The Draft EIS acknowledges flooding as an environmental factor that can contribute to potential impacts from an oil spill incident in Chapter 4, Section 4.3.2, *What environmental factors contribute to potential impacts from an incident?* In addition, Section 4.5.2.1, *Oil Spills*, addresses the movement of spilled oil in the Chehalis River during flood conditions; this information was incorporated into the oil spill model (Appendix N, *Oil Spill Modeling*). The potential impacts of exposure to spills are addressed in Section 4.7, *Impacts on Resources*.

GP190, Dennehy, Casey (Surfider Foundation)

Comment GP190-1

My name is Casey Dennehy. I work for the Surfrider Foundation and I actively advocate for protecting the spectacular marine resources in our region. I am a surfer, a fisherman, a clammer, a bird watcher, and I personally enjoy our natural surroundings every day. All these things that I love dearly could be lost with one oil spill. I chair the Grays Harbor County Marine Resource Committee and have been appointed by Gov. Inslee to represent recreational interests on the Washington Coast Marine Advisory Council. I also serve on the Olympic Coast National Marine Sanctuary Advisory Council. I am not representing these organizations in this letter. Rather, I am demonstrating that I spend considerable time and energy to protect our marine resources so that myself, my family, my friends, and future generations can enjoy Washington's glorious coastline. All that work, and the work of countless other individuals to keep the Washington coast pristine and wild, could be undone with one accident. Numerous impacts have been identified throughout the DEIS and determined to have no means for mitigation. How many valuable resources must be put at risk before these projects are denied? Why should these projects move forward when there are risks to the community that cannot be mitigated? Those who would benefit do not share the risks our

community would face. When will a cost/benefit analysis be done to accurately compare the risk with the purported benefits? The burden of risk is placed entirely on the local population and resources, while many others would profit handsomely without having to bear any significant risk. This math doesn't add up for our community. I am also a highly trained wildland firefighter and know a thing or two about anticipating and managing risks. The first rule is: if the threats are too great, avoid them. Do not drop that match because once you do, you can't take it back. These projects should follow the same rule. If they were approved there would be no going back. The proverbial fire would be on our doorstep and all we could do is hope and pray for no accidents. Unfortunately, this industry's track record gives us no reason to be hopeful. These projects, if approved, threaten to destroy the great things that belong to Grays Harbor and Washington State residents. And when an accident does occur, our community will pay for it. A legitimate cost/benefit risk analysis would show that these projects are not a good deal for the citizens of Grays Harbor county or Washington State. Deny these projects. Choose the no project alternative.

Response GP190-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP191, **Denney, Casey (Surfider Foundation)**

Comment GP191-1

My name is Casey Dennehy. I work for the Surfrider Foundation, and I actively advocate protecting our marine resources in our region.

I'm a surfer, fisherman, clammer, a bird watcher. I personally enjoy our natural surroundings every day. All these things that I love can be lost with one oil spill. I'm a member of the Grays Harbor Marine Research Committee. I've been appointed by Governor Inslee to represent recreational uses on the Washington Coast Marine Advisory Council.

In other words, I spend considerable time and energy to protect our resources so that myself, my family and friends, and future generations can enjoy Washington's glorious coastline. All this work can be undone with one accident.

Two minutes is woefully inadequate to address the EIS statements, so I will summarize. Numerous impacts have been identified and determined there are no means for mitigation. How many valued marine resources can be put at risk before these projects are denied? I say none. In this case there are many.

Those who would benefit do not have the risks our community would face. The burden rests entirely on us while many people who are not in this room cash in at our expense. This does not add up for our communities.

I'm also a highly trained wildfire fighter anticipating and managing risks. The first rule is if the threat is too great, avoid them. These projects should follow the same rule. If they're approved there would be no going back. The proverbial fire would be on our doorstep.

And I hope and pray there's no accidents. Unfortunately, given this industry's track record, there is no reason to be hopeful.

These projects, if approved, threaten to destroy the greatest things that belong to Grays Harbor and Washington state. And when an accident does occur, our community will pay for it. Deny these projects and choose the no project alternative. All it takes is one accident.

Thank you.

Response GP191-1

Comment acknowledged.

GP192, **Dickason, Pat**

Comment GP192-1

Hello, I'm Pat Dickason. I'm president of League of Women Voters, but I'm speaking from my own point of view. The League is nonprofit membership organization, which neither supports or opposes candidates or parties. However, The League developed positions in multiple public policy areas.

And among these positions we support policies that ensure public safety in communities, protect public health, maintain environmental policy, protect streams and estuaries, and reduce toxic air pollutants.

Based on these positions, we are particularly concerned about the contamination risks to Olympia's water supply should an oil train shipment on the rail lines derail or spill.

Response GP192-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP192-2

The League is concerned about the project's identified such as vehicle traffic delays, tsunamis, air pollution, major train accidents, oil spills, water contamination, fires and explosions, impact of noise and vibration, and likely impact of global climate change of these proposed projects, just to name a few.

We further suggest that policy makers at all levels need to be aware of the urgent warning of that there is no time to waste in reducing the carbon footprint, avoiding the most serious consequences of global climate change that can no longer support our civilization.

The League urges that these permits be denied.

Response GP192-2

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP193, **Dickerson, Michael**

Comment GP193-1

My name is Michael Dickerson. I do not believe that the current DEIS contains sufficient information to be able to make a determination on these projects. Let me give you a couple of examples. The DEIS says that in the future it's likely that oil sands will come into the harbor with increase of pollution over what was projected in the DEIS. The oil sands projection is not just a little oil increase, but a major increase.

I spent a month with the CIO projects in the tar sands in Alberta. The problem with trying to mitigate the oil sands, tar sands as we call them, because they have to go to through factories, to -- each location involves onto the trains, off of the trains, and into the pipelines. This is not something that DEIS mentioned. It will be worse.

Response GP193-1

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil and the potential for the proposed action to induce production at those sources, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Comment GP193-2

The second thing I would like to mention, the DEIS assumes that the spills will be combined. They come into the ground. It doesn't talk about the environment in which they will spill. The environment in which they will spill contains ethyl alcohol and diesel fuel. I'd like to know the mitigation for a fire at that project at that yard. It seems to me that that's very difficult.

Response GP193-2

Practices and procedures to prevent and respond to fire and explosion events at the project site are described in Draft EIS Chapter 4, Section 4.4.2.2, *Fires or Explosions*. Oil spills at the project site would likely occur in the concrete paved containment areas for the railcar loading and unloading area or within the geotech (clay)-lined storage tank containment area. Storage and handling of oil would be segregated from storage and handling of methanol to minimize such risks. Additionally, Section 4.3, *What mitigation measures would reduce impacts related to terminal operations at the project site?* includes applicant measures to further address these risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP193-3

And lastly, to give you an example of human potential for catastrophe such as (inaudible) the Cascade, it cost over $1 million to build it. And the old bridge across the street, that would need to be replaced to give the railroad right of way. And it's inadequate for the project. So I think its difficulty with this is real. Rethink this.

Thank you.

Response GP193-3

Comment acknowledged.

GP194, **Dickerson, Michael**

Comment GP194-1

My name is Michael Dickerson, D-I-C-K-E-R-S-O-N. I live at 200 West 10th, Aberdeen.

I have concerns that an agency from the EIS, as proposed, could not make a valid decision. I will give a couple of examples.

One, the EIS says that in the future we could receive oil sands, commonly called tar sands into these terminals. The EIS says that will cause a significant increase in pollution. It doesn't measure this nor does it preclude it.

Those facilities require heating the railcars and heating the storage facilities to keep the tar sands liquid enough to have them transported. It is common knowledge that this is not easily mitigated, the smell, because the heat has to be vented, and there is not presently a capture method that captures a significant part of the fumes from the heating process.

In Alberta, where most of this is now originating, the difficulty of getting the oil out of their system and into railcars is something that is causing a smell in excess of four kilometers from the facility, and it is severe.

Response GP194-1

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil and the potential for the proposed action to induce production at those sources, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Comment GP194-2

Second problem, the EIS addresses spills and potential fires. It does not address the environment of a spill in the Aberdeen yard. The Aberdeen yard stores ethyl alcohol cars. The ethyl alcohol cars are far more volatile than either Bakken crude or the other things that are stored there, which is canola oil and diesel fuel.

If a derailment should puncture an ethyl alcohol car, that would cause a number of problems. One, the heat would be severe, and every instance where an ethyl alcohol car has been punctured, it has caused a fire, and the fire usually spreads to all of the other cars in the immediate vicinity.

There was one within a month on the Burlington in which one car derailed and blew up the other four.

If you punctured one here and you had the number of cars being stored here as are stored now, it would be a major disaster. If you had the increased storage of cars, since neither Imperium or Westway can't take the entire train at one time, they have to store the cars in the Aberdeen yard, the fire potential is severe and has not been addressed in the EIS at all. It has only addressed a fire in an isolated location, not in the environment that would be the most likely place to have a fire.

As an example, last year, the PS&P had four derailments. Two were in yards, two were outside of yards. The likelihood of a derailment in the yard is therefore 50 percent of all derailments and the likelihood of a derailment in the yard is therefore something that needs to be studied.

The EIS anticipated that the trains would be traveling at between five and ten miles an hour which, in the case of a derailment, is not a significant speed. What it fails to address is that the power on the trains is four diesel engines on a spill that they had at the east end of the yard, PS&P last year. The train pulled the cars almost 200 feet before it stopped, and that was traveling at five miles an hour. All the cars -- and the cars were on their side and they were actually pulled on their side. It happened to fall on the north side of the track.

If that had fallen on the south side of the track and had been on the east throat of the yard rather than the west throat of the yard, those cars would have taken out five ethyl alcohol cars which were standing on the adjacent track.

Those are my comments. I am not intrinsically in favor or not in favor of the project. I would just like to see all of the issues clearly presented so people can make an informed decision on what needs to be done and what the cost would be if the worst things happened. Thank you.

Response GP194-2

The proposed action is specific to the handling, storage, and transport of crude oil and would not result in changes to existing operations. The approach to the risk analysis is to consider different spill scenarios of crude oil that could occur related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, a spill could occur at any location. Scenarios were chosen based on operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Nonetheless, mitigation would not completely

eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

GP195, **Dietz, Kimberly**

Comment GP195-1

Dear Washington Leaders, Neighbors, and Friends, I beg you to consider the long-term possible impacts of this decision. Consider all aspects of sustainability and resiliency for people as well as for the environment. Think also of future generations - particularly, the ability of your great grandchildren to thrive. In doing so, you will likely realize that neglecting our natural resources and placing natural ecologists in harms way, this proposal should be rejected. It is not a matter of measuring fuel-related disasters by their likelihood but by the level of impact and destruction the accidents inflict. It is not a matter of if but a measure of how failed ecosystems ever have an opportunity to be safe, long-lasting, healthy, and cherished. Please, do what is good for all. With hope, Kim

Response GP195-1

Comment acknowledged.

GP196, **Dilsaver, Erin**

Comment GP196-1

I am in support of this project. it would mean jobs for the area and oil transportation by train is the safest way to transport. if people really cared about it negatively they would stop driving cars and they don't.

Response GP196-1

Comment acknowledged.

GP197, **Dilworth, Erin**

Comment GP197-1

The Draft Environmental Impact Statements on the proposed Westway and Imperium oil-by-rail terminals do not address several significant factors. The Washington State Department of Fish and Wildlife has stated, “Grays Harbor is an area particularly sensitive to the adverse effects of oil spills.” The DEISs do not address the potential impact an oil spill would have on migratory marine mammals, birds or salmon. The Grays Harbor estuary is a extremely important stop-over area for migrating waterfowl, a nursery for commercial shellfish populations, and a throughway for endangered Chinook and coho salmon.

Response GP197-1

Draft EIS Chapter 4, Section 4.7.1.3, *Animals*, identifies potential impacts to marine animals, including potential impacts to sensitive areas within the study area. Sensitive areas identified in Section 4.7.1.2, *Plants*, include the Chehalis River Sure Plan Natural Area and the Grays Harbor National Wildlife Refuge, and critical habitat areas for the federally listed bull trout, green sturgeon, and marbled murrelet. Section 4.7.1.3 also identifies that the Grays Harbor National Wildlife Refuge supports migrating shorebirds and identifies potential impacts to birds foraging on invertebrates in spill-affected areas and potential effects to birds of physical contact with oil. Section 4.7.1.2 also identifies potential impacts to salmonids from oil spills, including effects on the survival of eggs and larvae and fish mortality.

Comment GP197-2

This DEISs fail to consider the significant impact any scale oil spill would have on tourism dollars, commercial and recreational fishing dollars, ecosystem values of marine mammals, shore birds, anadromous salmon, a functioning estuary, and the inherent value of all forms of life in Grays Harbor.

Response GP197-2

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP197-3

Additional research into the impact of various sized oil spills on fish, wildlife, and ecosystem services of Grays Harbor needs to be conducted prior to moving forward with any facet of these proposals.

Response GP197-3

The approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Nonetheless, mitigation would not completely

eliminate the possibility of an incident. Depending on the specific circumstances of an incident, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP197-4

The DEISs claim the proposed oil terminals would have no significant impact on Tribal nations. This finding clearly fails to acknowledge the fact that an oil spill of any scale has the potential to reach the Usual and Accustomed fishing grounds granted to the Quinault, Hoh, Quileute and Makah Tribes in 1994. Additionally, an economic study commissioned by the Quinault Indian Nation found that a major spill could cause a direct loss of as much as $20 million in wages and up to $70 million in revenue for affected businesses. These potential significant impacts need to be addressed in the DEISs before moving forward with any facet of these proposals.

Response GP197-4

Draft EIS Chapter 4, Chapter 5, and Chapter 6 state that the proposed action has the potential to result in significant environmental impacts from increased risk of an oil spill, fire, or explosion. Because the consequences would depend on the specific circumstances of the incident, the potential impacts are described in general terms in Section 4.7, *Impacts on Resources*, and include the potential for significant impacts on tribal resources.

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* reflects additional information on the economic and social costs of oil spills. This includes information on derailments and other accidents involving trains carrying crude oil and information on a crude oil spill during marine transport; however, the scope of the economic analysis is limited to the costs and benefits specific to the City of Hoquiam. Refer to the Master Response for the Economics, Social Policy, and Cost-Benefit Analyses.

Comment GP197-5

A 2014 study conducted by the Surfrider Foundation, along with other partners, found that in 2014, Washington residents spent $481 million on recreation on the coast, where more than 1/3 of the associated trips were spent in Grays Harbor County. The current DEISs fail to acknowledge the significant impact an oil spill of any scale would have on recreation in Grays Harbor County, and how a loss of substantial tourism dollars would affect the local economy. Further research on potential revenue loss caused by removal of recreation opportunity due to an oil spill needs to be conducted prior to moving forward with any facet of these proposals.

Response GP197-5

Final EIS Chapter 4, *Environmental Health and Safety*, Sections 4.4.4, 4.5.4, and 4.6.4, have been revised to clarify that in the event of a spill, fire, or explosion, there is the potential for impacts on all resources in the study area addressed in Chapter 3, *Affected Environment, Impacts, and Mitigation*, including recreational resources. Potential impacts on recreation from oil spills are described in Final EIS Chapter 4, Section 4.7.1.5, *Recreation*, and impacts from an oil fire or explosion are

described in Section 4.7.2.6, *Recreation*. Refer to the Master Response Economics, Social Policy, and Cost-Benefit Analysis.

Comment GP197-6

Lastly, both DEISs provide only a No Action alternative. Other alternatives that explore solar, wind, and other clean, renewable energy sources, infrastructure and jobs should also be considered and addressed in these DEISs.

Response GP197-6

Refer to the Master Response for Project Objective and Alternatives for an explanation of the alternatives evaluated in the Draft EIS.

GP198, **Dolph, Phyllis**

Comment GP198-1

Please pay special attention to the comments made by Tim Manns of Skagit Audubon and all comments made by Washington Audubon. Birds are at risk but it is not only birds which are at risk. All plants and animals, including people, are at risk when it comes to oil spills. Infrastructure and oil clean ups will not be paid for by the oil industry, but by tax payers.....which is wrong. We need desperately to learn how to wean ourselves off oil. Therefore, these oil projects should be denied. Phyllis Dolph

Response GP198-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP199, **Domike, Tammy**

Comment GP199-1

The DEIS for crude oil terminals in Grays Harbor is a deeply flawed document. I am a lifelong Bookseller, and it reminds me of particularly bad “self-published” books. It is imperative that the final document be rid of the many flaws that are rampant in the DEIS. Some instances of the problems are:

It very much needed both a proof reader and an editor.

There are non-existent quoted passages, and looking for the referenced page number leads nowhere in many cases.

The grammar and spelling alone make it not a document to be taken seriously.

A very telling error, is that the people preparing this document were unable to get their own mailing address correct. I certainly hope the Seattle Post office is able to get all the comments to you.

Making this document such an unwieldy size, made it cost prohibitive for public ownership, those for whom this was supposedly being prepared. It is not easy to read through repetitive, technical banks of paragraphs. This made it inaccessable to many general readers.

Response GP199-1

The commenter does not provide sufficient details to allow for a response.

Comment GP199-2

The electronic portal was not working between Nov 6 and Nov 10. It took much pressure from the public for this to be addressed and no relief for the loss of comments has been proposed.

Response GP199-2

The issue was fixed and a phone support line was established to provide assistance 24/7 through the end of the comment period.

Comment GP199-3

The research on many topics, such as the Chehalis River data are based on faulty assumptions. If you did not have records for the Chehalis, you should have studied the Chehalis, not simply use a sleight of hand and insert data from some other river that is kinda sorta like the Chehalis. The tidal data is woefully off, as we saw in this past month's storm, when the Chehalis river reached 21.1 feet at flood stage, and with sustained winds of 45 to 65 mph, your data is completely inadequate.

During these same storms we saw landslides in Grays Harbor and there was a mudslide across the tracks between Nisqually and Tacoma, 45 feet long and 15 feet tall. This shut down the rail to freight and passenger service for 2 days. Locally, many rails were in 4 inches of standing water.

Response GP199-3

The information presented in Draft EIS Chapter 4, Section 4.3.2.3, *Water Flow*, is intended to generally describe the range of water flow conditions that can occur within the study area. Draft EIS, Appendix N, *Oil Spill Modeling,* presents the assumptions used relative to wind conditions and water currents within the study area. Wind, tide, and other factors affecting water flow used in oil spill modeling are further described in the notes section of Table 1 (see p. N-5 of Appendix N) and in the Master Response for Oil Spill Modeling Methods.

Comment GP199-4

This past month also saw an earthquake in Grays Harbor, just ahead of where Grays Harbor Rail Terminal is asking to be permitted. The 2.4 magnitude quake occurred at 3:36am, November 13th, west of Bowerman Field and Grays Harbor Wildlife Refuge. This shows that Grays Harbor very much has fault lines, and an earthquake is not some 500 year danger, but a very real daily one.

Response GP199-4

Refer to the Master Response for Earthquake Probabilities for an explanation of the probabilities of earthquakes reported in the Draft EIS. Refer to the Master Response for Seismic Risk and Design

Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment GP199-5

Many others will provide you with scientific evidence why this is a flawed document and that your assessments and conclusions are in error. It is a joke of a document if it is supposed to protect the people and ecology of Grays Harbor. This month also saw a Supreme Court Judge, find in favor of a Children's lawsuit, that yes, young people of our state do have the right to inherent a clean environment. It also directs the Dept of Ecology to use Best Science when making your decisions. How will you comply with that finding, while using this badly executed document & the research therein?

Please deny these permits. The dangers are too great and you say so often, there is little or no remediation. Don't make Grays Harbor the Sacrifice Zone for private Oil profits.

Tammy Domike
Hoquiam, WA

http://www.spokesman.com/stories/2015/nov/14/small-earthquake-hits-grays-harbor/
http://kbkw.com/flood-warning-continues-near-freezing-temperatures-expected-thursday-night/
http://westernlaw.org/our-work/climate-energy/dirty-energy/Protecting-Washington-Atmosphere-as-a-Public-Trust

Response GP199-5

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP200, **Doull, Bryan**

Comment GP200-1

Oil trains should travel caravan style, in three parts, to increase safety. Here is one approach. Ahead of any oil train between a mile and three miles ahead of the oil train should be a short scout train whose function it is to find any problems before the oil train passes over those tracks and would tell the oil train to stop if there were any problems. The second part of the caravan would be the oil train or trains. Taking up the rear would a separate train that has a complete oil spill response team and all the equipment needed to handle a oil train spill or derailment. No waiting for any local emergency crews to arrive. A team and equipment stays one to five miles behind the last oil train car.

Response GP200-1

Comment acknowledged.

GP201, **Downing, Beulah**

Comment GP201-1

God created our earth and now we are messing it up. We should not be using these dirty fuel sources - they should remain in the ground. And we are putting a death threat to those who live near the train line or the export building.

Response GP201-1

Comment acknowledged.

GP202, **Drumheller, Susan (Idaho Conservation League)**

Comment GP202-1

Thank you. My name is Susan Drumheller. I'm with the Idaho Conservation League. And I live in the blast zone near the main BNSF line near Sandpoint, Idaho.

I realize that you're making decisions in Washington for Washingtonians but I hope that your decisions will impact people outside of the state.

Sandpoint is at the top of the funnel, where all westbound rail track conversions. All the Bakken oil trains roll by my house, and that's after they cross Lake Ponderay.

So while I worry for the safety of my family and my friends, I also worry about the risk torturing our waterways, which are a big part of the economic life flood of North Idaho.

This week our county first responders, Idaho Department of Homeland Security, Idaho DEQ, and the EPA and other agencies practiced a full-scale exercise that simulated the derailment of a unit oil train off the trestle over Lake Ponderay. They practiced because they recognize a derailment is a real risk. But no matter how much they practice or how fast they respond, they cannot prevent irrepairable damage to our lake, which is critical habitat for nature trout, provides drinking water for thousands of people, and is the premier asset for our tourism economy.

These trains also travel along the Kuni River, which is home to endangered sturgeon, and across the Rathdrum Prairie Aquifer, which is the drinking water source for half a million people in North Idaho and Eastern Washington.

A spill in any of these critical water sources would be devastating to North Idaho's economy and quality of life, and cannot be mitigated. Therefore, the only solution is prevention. We cannot allow increase in oil train tracks and the risks that they bring. So it's imperative that you deny these permits. Thank you.

Response GP202-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in

the extended study area under existing conditions, the no-action alternative, and the proposed action.

GP203, **Dunlap, Fredric**

Comment GP203-1

Name: Fredric C. Dunlap
Organization: Presbyterians for Earth Care
City/State/Zip: Issaquah, WA 98029

It does not seem very intelligent to build oil shipping terminals in the Grays harbor area because of the catastrophic effects of spills from accidents and/or geographical and atmospheric events that are probable in the future to that area. Grays Harbor sits in a major earthquake and tsunami zone. The earthquake in Japan near the nuclear power plant is an example of poor planning that should be a warning against building sensitive facilities near ocean shores (in tsunami zones).

Response GP203-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP203-2

Another reason to protect Grays Harbor from oil spills is to protect the fish and wildlife that live in that area. The Washington State Fish/Wildlife Dept. believes that Grays Harbor is particularly sensitive to any oil spills. An ·oil spill could devastate marine resource jobs which support more than 30% of that areas workforce. A recent study found that an oil spill could put more than 150 commercial fisherman from the Quinalt Indian Nation out of work resulting in as much as $20 million in wages, and $70 million in revenues for affected businesses.

Because of the recent poor Safety Record of Oil Trains, and the worsening of the Earths atmospheric conditions, I strongly recommend rejection of these proposed oil shipping terminals.

Response GP203-2

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP204, **Durr, Becky**

Comment GP204-1

I'm Becky Durr. I live in Aberdeen. Our children grew up here and now their children are growing up here. We are surrounded by this beautiful, bountiful land and we'd like to pass it on intact.

In 1988, the Nestucca spilled heavy fuel oil offshore. Oil spread from Ocean Shores south to Oregon; north to British Columbia; and east to Dungeness Spit. The Ocean Shores Convention Center was used for cleaning up oiled birds.

Our children were in grade school and they wanted to help so we went there to volunteer. Rescue crews could use the sheets and towels we brought, but children were turned away because it was too dangerous.

I believe this oil spill and explosions were omitted in the EIS. Such catastrophes should have been cited as examples of environmental impact from them. We know oil spills cannot be contained. Oil spills kill marine life. Oil fires cannot be extinguished. Oil explosions demolish property and kill people.

There's never enough money and there will be no complete recovery in our lifetime.

From both of environmental impact statements I quote, The cumulative projects would have unavoidable and significant adverse environmental impact on noise, tribal resources, vehicle traffic, and environmental health and safety. Isn't this reason to deny permits? It's too dangerous.

Response GP204-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP205, **Durr, Rebecca**

Comment GP205-1

This is a comment about the proposal to halt operations for 2 weeks each year, near the time of peak shorebird migration north. This is totally inadequate to protect shorebirds which migrate in this hemisphere. If there were a spill at any time it would affect shorebirds. They eat creatures from the shores and mudflats all around the harbor. Those creatures would surely be covered with oil and smothered by a spill. I don't know how you plan to clean up a spill which would be moved to the shores by action of the tides and wind. There are shorebirds present here at all times, with many migrating together in the spring and scattered migrations in the fall. A spill at any time could have an impact on the survival of shorebirds for many years, as we have seen with previous spills. If their food is wiped out by a spill at any time of the year, it would impact many members of the chain of life in our harbor, and it could be devastating to some, including shorebirds which might not be able to continue on their journeys without the necessary food they are accustomed to finding here. If you propose halting operations during 2 weeks in order to protect shorebirds, then think again, and do not allow any transport of oil here. That would protect shorebirds. Ceasing operations for only 2 weeks would only prevent all the visitors to our Shorebird Festival from witnessing an environmental disaster.

Response GP205-1

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification. Potential impacts on resources in the event of a spill, fire, or explosion are addressed in Chapter 4, Section 4.7 *Impacts on Resources*. Final

EIS Section 4.7 has been revised to indicate that the mechanisms for potential adverse impacts also include secondary impacts on shorebirds from loss of food sources. Chapter 4, *Environmental Health and Safety*, acknowledges (in multiple sections) that oils spills are not completely preventable even with the regulatory requirements and mitigation measures that would reduce the risk of an oil spill; Chapter 4 further states that that the potential impacts from an oil spill could be significant.

GP206, **Durr, Rebecca**

Comment GP206-1

This is a comment about the proposal to halt operations for 2 weeks each year, near the time of peak shorebird migration north. This is totally inadequate to protect shorebirds which migrate in this hemisphere. If there were a spill at any time it would affect shorebirds. They eat creatures from the shores and mudflats all around the harbor. Those creatures would surely be covered with oil and smothered by a spill. I don't know how you plan to clean up a spill which would be moved to the shores by action of the tides and wind. There are shorebirds present here at all times, with many migrating together in the spring and scattered migrations in the fall. A spill at any time could have an impact on the survival of shorebirds for many years, as we have seen with previous spills. If their food is wiped out by a spill at any time of the year, it would impact many members of the chain of life in our harbor, and it could be devastating to some, including shorebirds which might not be able to continue on their journeys without the necessary food they are accustomed to finding here. If you propose halting operations during 2 weeks in order to protect shorebirds, then think again, and do not allow any transport of oil here. That would protect shorebirds. Ceasing operations for only 2 weeks would only prevent all the visitors to our Shorebird Festival from witnessing an environmental disaster.

Response GP206-1

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification. Potential impacts on resources in the event of a spill, fire, or explosion are addressed in Chapter 4, Section 4.7 *Impacts on Resources*. Final EIS Section 4.7 has been revised to indicate that the mechanisms for potential adverse impacts also include secondary impacts on shorebirds from loss of food sources. Chapter 4, *Environmental Health and Safety*, acknowledges (in multiple sections) that oils spills are not completely preventable even with the regulatory requirements and mitigation measures that would reduce the risk of an oil spill; Chapter 4 further states that that the potential impacts from an oil spill could be significant.

GP207, **Dye, Jessie**

Comment GP207-1

This morning a small earthquake hit Clark County, WA, reminding us once again that we in WA live in a very active subduction zone and are at risk for earthquakes a variety of magnitudes. Near the

site of the Imperium and Westway proposed terminals many tsunami warning signs are posted. The sites themselves are located on unstable fill which would collapse during a seismic event. There is no evidence in the DEIS for either project that the nature of the soil where tanks are proposed during is taken into account, including its stability during a tsunami or earthquake. It is essential that measures be included in the DEIS that plan for securing the oil tanks in the event of either an earthquake and tsunami and that local evacuation plans be outlined and funding for emergency planning be established.

Response GP207-1

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events. Section 3.1.7.1, *Applicant Mitigation*, includes a measure proposing that the applicant ensure that a tsunami evacuation and emergency management plan for the facility is prepared prior to beginning operations.

Comment GP207-2

Most importantly, there is no plan for the mitigation of damage in the event of these major crises and no cost analysis nor evaluation of insurance needs in the event of such a catastrophe. There was an earthquake today, and there will be others. The tsunami signs are by the port of Grays Harbor are there for a reason.

Response GP207-2

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP207-3

If a compelling plan for management of the site during a natural disaster, evacuation and safety plans for the local community, and mitigation of resultant damages cannot be developed, the permits should be unequivocally denied.

Response GP207-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP208, **Dye, Jessie**

Comment GP208-1

Thank you. Jessie Dye. I'm here with an organization called Earth Ministry, but really I'm speaking as a citizen today.

I moved to Washington state in 1976 and loved Grays Harbor County, loved the coast, loved this beautiful, beautiful country so much so that from 1978 to 1980 I was a volunteer lawyer for the groups -- the many groups that have hosted and (inaudible) standing. And it gives me an odd feeling approaching this place. So grateful that it never produced electricity.

We said at that time that it was a dirty and dangerous and terribly, terribly risky disaster for public health, and ridiculously expensive for what we would get from it.

Then in 2011, when Fukushima happened, the nuclear disaster that resulted from an earthquake and a tsunami and fought for the grace of God to go with us. This could have happened here.

And now I read a proposal that puts oil terminals on fill in a clear earthquake subduction zone. As I walk through the area, there are tsunami warning signs everywhere. And I ask you, what could go wrong?

This is a project that cannot be mitigated. The risks are too high. There is nothing in the environmental and the Draft Environmental Impact Statements that list evacuation plans, that lists plans to secure the site in the event of either of these extremely predictable catastrophes.

As I've seen the rail tracks in Grays Harbor it's unbelievable to me that they could actually carry the weight of these oil terminals. So I ask you first of all for far better mitigation plans, far better than you have, and to the deny the permits.

Response GP208-1

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

GP209, **Eachus, Ann**

Comment GP209-1

Continuing to burn fossil fuels is causing the changes to weather patterns that we are beginning to see. Droughts are causing food shortages, heat is causing premature deaths. Storms are causing huge losses to property and life. We should not invest more resources in programs that help people cope with the problems already visible, not enable more fuel get to market.

Response GP209-1

Comment acknowledged.

GP210, **Eddington, Marianne**

Comment GP210-1

I implore that you choose to reject the proposed oil terminals for Grays Harbor. The rail cars have a proven history of derailment spills. The benzene in crude oil will have lasting effects on the sensitive environment surrounding this area. The oil train fires experienced in Canada and the U.S. Have caused horrific deaths and property damage.it will take many years before tanker cars can be built strong enough to be more effective against potential explosions. Many trains pass through small towns where they block traffic and commerce. In addition, these small communities have not had training in emergency preparedness for a spill and/or explosion that would cause toxic damage to people and property on a scope that is hard to even imagine.

Temporary excitement about the jobs the terminals will bring to the community will be short lived after the structures are completed. Then few new jobs will not be sustainable. Why do these companies always try to build in economically depressed areas, where people often are struggling to find a voice about issues that affect their quality of life? They are also Washingtonians, so I consider them my neighbors and want to write on their behalf.

The Paris climate change talks begin today. Let's be an example to the world that we will not succumb to the capitalistic powers of the oil companies, and that we know the greenhouse emissions caused by this plan will affect our whole world. We are all responsible for each other's welfare and well being.

Response GP210-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP211, **Edwards, David**

Comment GP211-1

My name is David Edwards. I'm a retired physician from Olympia. My concerns include the massive emergency treatment problem that a derailment from explosion would cause. Those are imminent and they've been discussed.

But more immediate, the problem of blockage of access of the emergency vehicles to medical facilities by slow moving oil trains of extreme length and duration are unacceptable hazard and threat to the public health and threat to the public health of the community. The permit really must be denied.

Thank you.

Response GP211-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP212, **Edwards, Karen**

Comment GP212-1

Please do not expand the oil terminals in Grays Harbor as the increased rail traffic through the Columbia Gorge will expose that beautiful area to grave potential environmental damage. The likelihood of an oil spill or explosive accident will increase and is too much risk. Please do not recommend this expansion.

Response GP212-1

Comment acknowledged.

GP213, **Edwards, Rose**

Comment GP213-1

There is no way to effectively boon a tidally influenced area in the case of an oil spill. It makes absolutely no sense to bring these operations in that would amount to a small handful of jobs when there are hundreds of existing jobs, direct and indirect that rely on the health of the estuary and surrounding waterways. From tourism to fishing and crabbing. Plus it is federally punishable to endanger the Quinault's treaty lands. The area is so ecologically and culturally rich, I couldn't imagine a worst place to propose these terminals. It's all risk with only small, immediate, non-sustainable benefit.

Response GP213-1

Comment acknowledged.

GP214, **Ellingboe, Linda**

Comment GP214-1

My name is Linda Ellingboe. I'm a native of Seattle. I'm a member of the Oregon Episcopal Church and we held an earth care retreat at the ocean over Earth Day. We helped with the ocean beach cleanup. The members of our group that were there.

And we also had some speakers, one of which was Jesse Guy of Earth Ministry, that told us about this, that there would be potentially an oil transfer station in Hoquiam.

We were pretty stunned because there had been all kinds of issues going up the I-5 corridor, and we hadn't heard about this one here. And one of the people in our group grew up around Willapa Bay and she hadn't heard anything. She was really quite unhappy about that that was going on. As a person of faith, I think the care for both the environment and people is critical to going forward. And it is our expectation that will be taken into account.

In Seattle last year there was -- there were overturned oil cars right below a main bridge right next to the cruise ship terminal in the middle of summer. When I went back to look at the exact date, which was July 25, I saw that there had been this past January 14 leaking cars on an oil train.

Some were pulled off in Spokane, some were pulled off in Vancouver, some were pulled off in Auburn. That could easily happen here. And because the trains are so close to the major access to the Hoquiam area, it's even more critical that this project be denied.

Thank you.

Response GP214-1

Comment acknowledged.

GP215, **Ellis, E.**

Comment GP215-1

Draft Environmental Impact Statement (DEIS) for Westway and Imperium proposed oil-by-rail terminals Public Comment

Elizabeth Ellis, resident

Aberdeen, WA.

The draft EIS documents for the Westway and Imperium projects at the Port of Grays Harbor are inadequate, containing incomplete data and findings.

I ask that these EIS's be redone and expanded to include more upstream communities and utilize current data and science.

My comments below focus on the Tsunami Risk elements in Appendix C of the DEIS for both projects.

The documents minimize the real hazards of a catastrophic earthquake especially in Grays Harbor. It is apparent that these draft EIS documents as a whole do not utilize best science and they should not be used to provide further guidance on the merit of these projects nor the mitigation measures necessary to justify the purported benefits over the risks to terrestrial, marine, and human communities.

Page 2. 2.1 Tsunami Modeling Methodology

- FERC's revised seismic design criterion (2007) requires that the seismic source used to generate a design tsunami event be consistent with a Safe Shutdown (SSE with a return period of 2,475 years.

Comment: Significant earthquakes of the magnitude of 9 or greater off the coast of Grays Harbor are known to happen in regular 300 – 600 year intervals. The area is due for a significant event any time now.

Every 300 to 600 years

Great earthquakes (magnitude 8 to 9) and tsunamis have repeatedly rocked the Pacific Northwest. Catastrophic earthquakes and tsunamis have occurred along Washington's coast at least six times in the past 7,000 years -- about every 300 to 600 years. There is a good chance that another earthquake will occur offshore within the next 100 years.
http://www.ecy.wa.gov/programs/sea/coast/waves/tsunami.html

Response GP215-1

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

Comment GP215-2

Page 15 Tsunami Force Calculations

Calculation of tsunami forces herein is conducted according to FEMA P646 (2012)2 . Results of force calculation for each tsunami force component are listed in Tables 3 and 4 for Westway Terminals LLC and Imperium Terminal Services Facilities, respectively. **Calculation of floating debris impact force has been conducted assuming lumber or a wood log –oriented longitudinally as debris.**

Comment: Debris from a tsunami would consist of ships of all sizes and lumber or wood log oriented either longitudinally as well as hitting the tanks and above ground tank components head on.

Response GP215-2

Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis,* calculates debris forces based on guidance from the Federal Emergency Management Agency's[1] (2008) *Guidelines for Design of Structures for Vertical Evacuation from Tsunamis*, which was developed for structures that would provide vertical refuge for evacuees above the level of tsunami inundation. Factors used in this document were derived from laboratory simulations of impenetrable vertical walls. Tsunami-borne debris may not accumulate around a circular tank the same way it would against a vertical structure. Stiffness between debris and vertical structures would differ from stiffness between debris and circular tanks, and impact and damming forces would likely differ for the proposed facilities and evacuation facilities. Uncertainties also exist regarding the size and type of debris that would float over the berm surrounding the site. However, these uncertainties are accounted for in the tsunami analysis by applying a factor of safety of 1.3, as described in Appendix C.

Comment GP215-3

[Proposed Mitigation 3.1 Tsunami

[1] Federal Emergency Management Agency. 2008. Guidelines for Design of Structures for Vertical Evacuation from Tsunamis. FEMA-P646. Washington, D.C.

- To minimize the potential for damage to the storage tanks related to geologic risks and unstable soils, the applicant will install pile-supported foundations that extend up to 150 feet deep for storage tanks to avoid excessive settlement from potentially liquefiable materials.

- To minimize the potential for damage to the storage tanks related to geologic risks and unstable soils, the applicant will develop final design specifications for proposed structures based on the following updated standards/information, including additional site-specific evaluation for the easternmost portion of the project site.

Comment: This mitigation is not sufficient. ADD THE ADDITIONAL REQUIREMENTS for tank design to include:

- To minimize the potential for damage to the storage tanks related to geological and Tsunami risks, all bulk oil storage tank design shall account for the following **five** categories of damage at a minimum 9.0 earthquake. The damages reported due to seismic actions in the past in unanchored above ground storage tanks have been observed principally at the base in the fond and the walls. Then, these damages could be producing the structural loss of the tanks. It can be classified in **five** general categories [Footnote 1: SEISMIC RESPONSE OF CYLINDRICAL TANKS FOR OIL. Cortés Salas Carlos and Sánchez Sánchez Héctor. World Conference on Earthquake Engineering. October 12-17, 2008, Beijing, China. http://www.academia.edu/658535/SEISMIC_RESPONSE_OF_CYLINDRICAL_TANKS_FOR_OIL 5th category added by E. Ellis]

1 . Buckling at the bottom plates of the wall tanks, where it is attending the maximal axial compression stresses due to overturning moment. In this zone the buckling of the plates appear with long deformations as elephant foot.

2 . Damage of the roof near to the end wall hoop and the internal columns is due to sloshing effect of the liquid.

3 . Damage in pipes and others accessories linking to the wall tanks during the seismic movement of the soil.

4 . Damage due to fails of the foundation or intense seismic loads

5 . Damage to tank structure from battering of representative sizes of ships that will be docked or in transit in the harbor (see table 3.18) Current use of boards and log damage does not address a real threat to these structures in a tsunami event and should be recalculated for varying representative debris and ships of different sizes striking the tanks head on as well as sideways.

Response GP215-3

Draft EIS Section 3.1.7.1, *Applicant Mitigation*, identifies measures that would reduce the potential for significant impacts related to the design and performance of the storage tanks during and following seismic and tsunami events. The Final EIS reflects the addition of a measure to incorporate automatic shut-off valves into tank design.

Comment GP215-4

2. Calculation of design runup elevation herein is conducted according to methodology described in Sections 2.1 and 3.3. This methodology has been previously approved by FERC and DOGAMI

Comment: **Final EIS must cite specific references within FERC and DOGAMI that specify which methodology applies to the calculation of tsunami forces. This information is not listed in the citations section and could be misleading or not applicable to Grays Harbor.**

Response GP215-4

Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis,* presents references in the final section of the report (the last page).

Comment GP215-5

Table 3. Tsunami force calculations according to FEMA P646 (2012) for two scenarios: with and without Sea Level Rise for Westway Terminals LLC Facility

Comment: In the event of a magnitude 9 earthquake and resulting tsunami, the amount of oil that would be spilled is outrageously large and impossible to prevent or to mitigate.

Response GP215-5

Final EIS Chapter 3, Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* clarifies expected post-seismic and post-tsunami performance of the proposed storage tanks. Refer to the Master Response for Seismic Risk and Design Requirements.

Comment GP215-6

Total combined storage Westway and Imperium is 127,000 **72M** barrels of oil. Each train (average two per day) 16 per week**. 2526 Rail Tanker cars**

One panamax tanker holds 17M Gallons.

Comment: Attributing sizes to spills does not equal damage potential. There must be a zero tolerance threshold for oil spills of any size.

References from the draft EIS Imperium and Westway Terminals in Hoquiam

Small S-20

Project site 2,100 gallons (50 barrels) spilled when transferring oil from rail cars or to vessels at the project site

Rail transport 1,000 gallons (24 barrels) spilled during a derailment along the PS&P rail line

Medium

Project site 10,000 gallons (238 barrels) spilled when transferring oil to a vessel at the project site

50,400 gallons (1,200 barrels) spilled from pipeline or storage tank at the project site

Rail transport 30,000 gallons (714 barrels or the contents of one full tank car) spilled during a derailment along the PS&P rail line

Large

Project site 8.4 million gallons (200,000 barrels, the entire contents of 1 full storage tank) spilled on project site

Rail transport 90,000 gallons (2,140 barrels or the contents of three full tank cars) spilled during a derailment along the PS&P rail line

150,000 gallons (3,570 barrels or the contents of five full tank cars) spilled during a derailment along the PS&P rail line

900,000 gallons (21,400 barrels or the contents of 30 full tank cars) spilled during a derailment along the PS&P rail line

Vessel transport 105,000 gallons (2,500 barrels) spilled into Grays Harbor from a vessel collision

Up to 1.2 million gallons (29,000 barrels) from a vessel grounding in Grays Harbor million gallons (360,000 barrels or the entire contents of one full tanker, including fuel) spilled into Grays Harbor from a vessel collision at harbor entrance

http://www.ecy.wa.gov/geographic/graysharbor/imperiumterminal.html
Appendix C

Size, quantity of ships expected in the harbor.
3.17 Vessel Traffic

Although there can be as many as 400 or more commercial, tribal and recreational vessels in the harbor during peak fishing times (Scharpf pers. comm.), fishing activities are highly seasonal and occur primarily in the fall with the highest point in September. (3.17-22)

Tanker. (Bulk Liquid Transfer) Deadweight tonnage: 53,100 metric Tons
Length 612 ft Width 106 ft

Tank Barge (Bulk Liquid Transfer) Deadweight tonnage: 20,000 metric tons
L x W 604’ x 75’

Cargo Ship. (Dry Bulk Cargo) Deadweight tonnage: 43,000 metric tons
L x W 656’ x 105’

Cargo Barge (Dry Bulk Cargo) Deadweight tonnage: 11,000 metric tons
L x W 512’ x 85’

RoRo Vessel (Automobile hauling cargo ship) Deadweight tonnage: 11,760 metric tons
L x W 600’ x 103’

Commercial Fishing Vessel Deadweight tonnage: 100-2000 metric tons.
L x W 82-262, 20-40’

Cargo barges traveling to destinations at the mouth of the Chehalis River or further inland are forecast to account for approximately 21% of total large commercial vessel trips through Grays Harbor in 2017 (Table 3.17-8). These vessels would likely have drafts between 0 and 17 feet, consistent with vessel data reported between 2008 and 2012 (Table 3.17-5).

Up to half of the cargo ships and tank vessel trips would be made by vessels in ballast, assuming that they are in ballast on either the inbound or the outbound trip. Vessels transiting in ballast would have a shallower draft than vessels laden with cargo. Using vessel data (U.S. Army Corps of

Engineers 2014a), ballasted vessels are expected to operate at a draft of less than 27 feet. Based on these assumptions, it is estimated that a substantial proportion (approximately 61%) of the vessel trips under the no-action alternative would be made by vessels that draft less than 27 feet. As described for existing conditions, these vessels are minimally constrained by tidal elevations at any of the three channel depths considered in this analysis.

The remaining vessel trips (approximately 39%) are projected to be laden cargo ships and tank vessels (with drafts between 27 and 39 feet). Pilots schedule most transits of these vessels when tidal elevations are at 5 feet or above MLLW (U.S. Army Corps of Engineers 2014a:21).

Response GP215-6

The comment presents text from the Draft EIS.

GP216, **Ellis, Liz**

Comment GP216-1

Good evening. My name is Liz Ellis. Imperium and Westway's proposed oil terminal DEIS has failed on a number of levels. It's incomplete and contradictory, and if I was rating it, I would give it D for deny.

Most reviews and the scope for the EIS focused on the immediate area of the project and the nearby vicinity within the city of Hoquiam. Although the two projects have applied for permitting within the City of Hoquiam, oil by rail impacts every city and community along the rail line within Grays Harbor County and every other county along the rail line in Washington state.

The scope of this EIS should be broadened to include all communities within the state.

Response GP216-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP216-2

Mitigation related to construction and routine operation does not address the constant noise and ground shaking from driving piles 150 feet into the ground.

The EIS must look at the health impacts of this noise stress on students trying to study, the elderly and the infirm.

Response GP216-2

Draft EIS Chapter 3, Chapter 3.7, *Noise and Vibration*, presents a detailed analysis of potential noise and vibration impacts from construction of the proposed action. Although Washington State and local noise regulations provide an exemption for construction noise during daytime hours, the Draft EIS analyzes impacts based on guidance provided in the Federal Railroad Administration/Federal Transit Administration Manual (*Transit Noise and Vibration Impact Assessment*) as cited in Section 3.7. Based on this guidance, noise and vibration impacts on the nearest sensitive receptors

(residential neighborhoods) from construction activities, including pile driving, are anticipated to be low.

Comment GP216-3

Section three describes risk of damage of facilities during an earthquake as having an increased potential impact with the potential for the tanks to rupture and result in a leak of crude oil into the environment.

This is a gross understatement, for the potential here is really measured in millions of gallons, not just a few barrels of oil.

Response GP216-3

This statement in the Final EIS has been revised to use the word "release" instead of "leak."

Comment GP216-4

The proposed construction of tank facilities would be the current building codes and standards.

Thank you.

Response GP216-4

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

GP217, **Engel, Kim**

Comment GP217-1

I absolutely oppose the increase of the oil rail traffic to these terminals. There is no way that Spokane and the other communities that these rail cars will pass through should have been left out of this decision process. It effects all of us!

Response GP217-1

Comment acknowledged.

GP218, **Engvall, Brady**

Comment GP218-1

Thank you for giving me the opportunity to comment on this issue. My name is Brady Engvall, and I'm a long-time shellfish grower, now retired. And I'm speaking for the shellfish growers in Grays Harbor.

So, the issue here is, the mitigation for an oil spill in Grays Harbor is nonexistent. The Global Response Plan the DOE proposed and is on record of applying to Grays Harbor has never been tested. We don't know what will happen. Oil spills happen. They're happening every day today.

The shellfish growers, the fisherman, and all the fishing families in Grays Harbor County have experienced these issues with oil spills. San Francisco, Coos Bay, the New Carissa in Coos Bay, the Nestucca in Grays Harbor, these all impact the fishing families.

It's got to be remembered, in Grays Harbor County nearly 30 percent of the income to the county is marine related and fishing industry jobs. One oil spill will eliminate all those jobs, thousands of jobs will be eliminated.

So I'm asking you today to think really hard about what this issue is going to bring to Grays Harbor. And thank you for the time to comment on this important issue.

Response GP218-1

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities.

GP219, **Engvall, Brady**

Comment GP219-1

Brady Engvall

From: Brady Engvall [brady@bradysoysters.com]
Sent: Thursday, October 08, 2015 11:15 AM
To: Brady Engvall
Cc: Arthur (R.D.) Grunbaum
Subject: Westway and Imperium crude oil-by-rail terminal Elss

My name is Brady Engvall. I live at 3714 Oyster Pl. E., Aberdeen. I'm a retired shellfish farmer.

One very serious issue is the type of crude oil and the volume that will be delivered to Grays Harbor. The oil we have grave reservations about is Canadian Tar Sands crude or bitumen. You know the stuff, they make highways out of it. This type of crude is heavier than water and sinks. The Rail Road has said that it must haul this type of oil. This type of oil is looking for foreign markets. Because the United States can't restrict local export of this product it will be handled.

As an example: In 2010 a pipeline broke and spilled bitumen into a tributary of the Kalamazoo River in Michigan. Today the cleanup costs are at 1.2 billion dollars. That's with a "B" and total cleanup has not been achieved.

The draft EIS calls for the updated oil spill "Geographic Response Plan" to protect the Grays Harbor estuary from an oil spill. When the current Response Plan was developed I ask the question. How would oil that sinks be handled in a spill situation? The written DOE response to my question was that- oil that sinks is outside of the Grays Harbor Response Plan. So.... we don't have any type of mitigation in response to oil that sinks. In essence, the projects are relying on the shellfish growers and public to absorb the time, money and energy to subsidize these two projects after an oil spill.

The cruel irony of this is the Geographic Response Plan calls on the shellfish growers and fishermen to marshal their resources for cleanup while at the same time destroying our ability make a living. No mitigation no projects!

Response GP219-1

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources and destinations of crude oil related to the proposed action, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

GP220, **Engvall, Brady**

Comment GP220-1

Brady Engvall

From: Brady Engvall [brady@bradysoysters.com]
Sent: Wednesday, November 25, 2015 8:20 AM
To: Brady Engvall
Subject: Comment to DEIS Westway-Imperium Improvement Projects

RECEIVED NOV 30 2015

Please incorporate by reference comment by: Quinault Indian Nation, Willapa-GH Oyster Growers Association, Washington Dungeness Crab Fishermen's Association, Audubon Washington and Friends Of Grays Harbor (FOGH).

Note: Because my concerns were not addressed from scoping comments to these projects I'm resubmitting my original scoping comments to be addressed in the FEIS. Thank you!

Dear Sirs, It is of interest that my direct concerns were submitted to the scoping process but the final product for the DEIS was presented in overly broad terms without specific identifiable mitigation .Crude oil by its very nature and the sheer magnitude of the proposals requires detailed accurate information for the agencies to make informed decisions that all citizens rely on.

From WAC 197-11-660 (in essence) and SEPA Handbook p- 62, I find this:

"One of the most important aspects of the SEPA process is the consideration of environmental impacts and the possible mitigation measures during agency decision making. SEPA substantive authority gives all levels of government the ability to condition or deny a proposal based on environmental impacts".

For SEPA to actually work my comments must be addressed in a manner that is in detail so government can carry out its public responsibility.

Thank you in advance,

Brady Engvall (360) 268 5518

Response GP220-1

Comment acknowledged. See response to specific comments below.

Comment GP220-2

Brady Engvall

RECEIVED NOV 30 2015

From: Brady Engvall [brady@bradysoysters.com]
Sent: Saturday, May 10, 2014 2:19 PM
To: Brady Engvall
Subject: Comments CBR- Originally typing into DOE's comment site. Error message appeared when sent so I did a c/p and will mail to ICF International, Seattle
RE: Comments to CBR Imperium-Westway

Dear Sirs,

In the last two weeks the local railroad (RR) has run off the tracks in the city of Aberdeen twice. This does not breed confidence that the local RR can haul crude oil to the port without a serious accident. Crude oil that has been proposed to be hauled has been described as dangerous by the federal government recently. Besides that industrial alcohol is also hauled on the same tracks and stored in close proximity to the crude oil storage tanks. Within the blast radius (currently described by the federal government as 2,000' for tracked crude) are important facilities such as grain silos feeding export markets worldwide. With these facts in mind I ask the following questions. Will the entire RR line from Centralia to Hoquiam be rebuilt to handle the large volume of crude oil proposed?

Response GP220-2

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under

existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP220-3

Does the city of Hoquiam have fire fighting equipment and man power to fight a crude/alcohol fire? Does mutual aid agreements allow other fire departments to respond? Does Hoquiam have and other responders have crude/alcohol fire training? Does Hoquiam and other responders have class "B" foam capability to fight oil fires?

What about Elma and Montesano- do they have oil fire capability and man power staffing to fight an oil fire and can their mutual aid help in an oil fire event? Does Aberdeen and Hoquiam presently fence RR stored transported hazardous materials such as at the siding in Aberdeen (presently this siding has no fencing)? Will the RR identify and tell local fire department what is in the RR cars so they can be prepared in case of a special fire event? Who trains first responders and will the RR help with the cost? Have fumes and secondary impacts been investigated to protect first and mutual aid responders. Does the Hoquiam and mutual aid responders have enough Aid-Car capability to cover a major event? finally- how will the RR and port protect the public from that one unknowable- the person bent on creating a catastrophic event by their actions? Will surveillance of the area be constant and verifiable?

Response GP220-3

Draft EIS Chapter 4, Section 4.2.1, *What framework prevents incidents from happening?* describes the formalized planning framework in place to address risks related to oil spills, fires, or explosions from the terminal operations, rail transport, or vessel transport. This section describes the requirements for planning and preventive equipment and design. Section 4.2.2, *What framework prepares for an incident?* describes federal and state regulations to prepare for an incident, the integration of plans, and drill and exercise requirements.

Final EIS Section 4.2.2 has been revised to indicate that railroad operators would be required to develop spill contingency plans consistent with state requirements and a mitigation measure is proposed for a contingency plan to be submitted to Ecology until state requirements are in place. Final EIS Section 4.2.3, *What framework provides responses to an incident?* has also been updated to better reflect existing response capabilities and resources in the study area, including information identifying existing gaps from the Marine and Rail Oil Transport Study (Ecology 2015). Final EIS Section 4.7, *Impacts on Resources,* has been updated to better reflect how the proposed action could affect emergency service responses.

Final EIS Chapter 4 reflects additional mitigation measures proposed to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

Chapter 4, *Environmental Health and Safety*, identifies other proposed measures to ensure that broader prevention, preparedness, and response planning involves the appropriate stakeholders and that updates to any plans applicable to reducing risks related to the proposed action contain appropriate applicant information and participation. To the extent possible, as outlined in the Master Response for Mitigation Framework, measures that address the need for more coordinated and focused planning clarify the role of the applicant as appropriate.

Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7 describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

For more information about the analysis of potential impacts on the BNSF main line, refer to the Master Response for the Geographic Scope of the EIS.

Comment GP220-4

Brady Engvall

From: Brady Engvall [brady@bradysoysters.com]
Sent: Thursday, May 15, 2014 2:43 PM
To: Brady Engvall
Subject: Comments to CBR (Crude By Rail)

RECEIVED NOV 30 2015

RECEIVED MAY 19 2014

RE: Scoping comments to CBR lmperium-Westway

Dear Sirs, Westway and lmperium presently are asking for permits to ship crude oil through the Port of Grays Harbor. Tank farms for crude oil are going to be placed on land owned by the Port. This land has been described as dredge spoils and close to the Grays Harbor estuary. Many other Port renters are located in the same area. As a retired shell fish farmer, in Grays Harbor, I have real concerns about these projects. Because of the nature of crude oil as a product and its current history of not being friendly to the natural environment I have these questions to be answered in the draft EIS.

Earth quakes and resultant tsunami type waves in the location of storage tanks will be a problem. We are in a earth quake zone of great magnitude just off the Washington coast. It has been reported that an earth quake of just 6.00 on the Richter Scale would cause liquefaction in dredge spoils plus possible tank failure. What analysis (peer reviewed) has been undertaken that would allow the proposed tanks to be built on dredge spoils? If liquefaction did happen what would be the outcome for the estuary? Would containment proposed hold all the oil and would the containment structures maintain their integrity? What safety features will be in place to stop oil transfer during a quake event? Will cleanup proposals work during an event and will cleanup crews be available for a massive spill? Where would cleanup start on land or in the water? What fire control measures would be in place since in Japan during the last quake fire was a major hazard? These are just simple questions and could be expanded to be very inclusive but you can see the proposals are not appropriate for location and scale of the projects present real risks for the public.

Tsunamis are a part of earth quakes off coastal Washington. The location of the proposed projects are within the tsunami flood zone for Aberdeen and Hoquiam. Couple an earth quake and a tsunami and you have total devastation. Because of the nature of crude oil and scale of the proposed projects Grays Harbor would never recover from an event. What study will be conducted to examine the effects of an earth quake and tsunami event on Grays Harbor and coastal Washington? Is a cost benefit analysis being prepared to compare long term benefits as opposed to total damage cost from a catastrophic event when it occurs? How long would it take the estuary to return to its original condition given the element of crude oil in the event of a massive spill. What are the benefits of Grays Harbor to fishing, shell fish farming and clam digging if lost to a spill? What is the occurrence here of smaller earth quakes at or above 6.00 for Grays Harbor. ls it within the projected life of the project?

Response GP220-4

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Refer to the Master Response for Seismic Risk and Design Requirements for a description of the earthquake source model and hydrodynamic modeling method used in the site-specific tsunami analysis conducted for the project site and presented in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis*.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP220-5

Sea level rise is now an accepted fact. How much and when are in dispute but it is happening and will continue to happen. What is the projected impacts from sea level rise on the projects? Will storm events added to sea level rise threaten the projects in their projected life span? The Chehalis River floods yearly does adding flood conditions, sea level rise and storm events threaten the location of the projects? What are the projections for sea level rise at the projects location and what effect does this have on RR lines serving the projects? Does soft RR bed lead to toppled rail tank cars?

Thank you for the opportunity to comment.

Brady Engvall (360) 268 5518

Response GP220-5

Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts, Climate Change*, clarifies predictions of sea level change in the project area and potential for flooding at the project site. With predicted sea level rise in the project area for 2050 of 1.57 feet, the project site will remain approximately 5 feet higher than the projected high tide. As such, it would not be subject to flooding even during extreme storm events.

Refer to the Master Response for Risk Assessment Methods for information about the approach, assumptions, and data sources used in the assessment of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*.

Comment GP220-6

RECEIVED NOV 30 2015

RECEIVED MAY 16 2014

Brady Engvall

From: Brady Engvall [brady@bradysoysters.com]
Sent: Monday, May 12, 2014 1:36 PM
To: Brady Engvall
Subject: Comments CBR (Crude By Rail)

RE: Comments to CBR lmperium-Westway

Dear Sirs,

Fifty jobs are being proposed for the CBR projects. As a recent scoping meeting it was stated by a person, with oil operations experience, that these types of operations rely on automation as humans make mistakes. So maybe the original 50 jobs as proposed is not the real figure in reality? A recent quote from an editorial in the Aberdeen World puts the issue of jobs in perspective: "A National Ocean and Atmospheric Administration report released this week said the commercial seafood industry in Washington was responsible for just shy of 61,000 jobs in 2012. A heckuva lot of those are on the Twin Harbors. Crude oil and seafood don't mix." Just the oyster production from Grays Harbor is $3,230,500 without economic multipliers. Willapa and Grays Harbor shellfish together account for $19,549,000 with multipliers in both harbors. As you can see the benefits to local economies are great not even adding in Dungeness crabs, razor clams and other associated seafoods.

Oil spills happen, a steady drip or something catastrophic, that is a given and clean up is never complete with 10 to 15% of cleanup considered a success. You have to imagine and include Willapa in the discussion as oil spills never stay put and impacts range far and wide. A little bit goes a long way. Given this I submit the following comments and questions.

Are there reliable baseline studies in Grays Harbor that define food chains and population dynamics in the estuary that would spell out what would be lost in the event of an oil spill? Who would do these studies and who would do the peer review? A few years ago a ship, the New Carissa, went aground near Coos Bay. The spill out in the open ocean of bunker fuel went into the estuary and killed many of Clauson's oysters. It was only 70,000 gallons of bunker fuel but it took many years for

the settlement to wind iits way through the courts after the shipping company appealed the original settlement. What will be the order of settlement if oil is spilled in GH? Will the railroad, the Port and shipping companies be responsible for losses to the oyster growers and not go bankrupt or challenge settlements after a spill? Will the companies who handle the oil be bonded for future spills and who administers and guarantees the bonds? Will affected citizens be able to collect unemployment insurance during and after a spill episode and if so for how long? After a spill has been partially cleaned up (success could be labeled as little as 10-15%) who pays for market disruption? After a spill it will never be the same as customers either don't come any longer or question the health of your product. This has been the experience of the Gulf seafood industry after the Deepwater Horizon oil spill.

Thank you for the opportunity to comment on CBR.

Response GP220-6

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP220-7

RECEIVED NOV 30 2015

From: Brady Engvall [brady@bradyaoysters.com]
Sent: Sunday, May 18, 2014 3:20 PM
To: Brady Engvall
Subject: Scoping comments lmperium - Westway

RECEIVED MAY 22 2014

Dear Sirs,

lmperium and Westway want to being crude oil to Grays Harbor for transshipment through the Grays Harbor estuary and along coastal Washington. These huge projects by scale will expose both Willapa and Grays Harbor estuaries to potential oil spill risks. Both of these estuaries have a natural resource based economy which provides to their respective communities over 30% of their economic base. By its very nature of and history crude oil and natural resource based economies do not exist comfortably together. Example- Exxon Valdez and Deepwater Horizon. The word "cleanup" is used extensively to describe how a spill would be treated but the word for clams ,crabs, salmon and oysters has no meaning in reality as 15-20% clean up is considered a success. This leaves 80 to 85% to be cleaned up by mother nature over time. Our natural resource economies will not survive this impact. Railroads(RR} are an important part of these proposed projects as this is how the oil gets to the Port and transshipment tank farms. Getting to Grays Harbor the trains cross 100 water courses and wetlands from Centralia each important to the sustainability of our natural resource economy.

The RR that provides this service to the projects is the Puget Sound to Pacific by name and is now having great difficulty staying on the tracks. Just in the last two weeks they have had three grain car derailments in Grays Harbor county and each spilling grain. With the recent history for crude oil

trains with environmental damage and explosions one only has to imagine what may have happened if these grain derailments had been crude oil in DOT-111cars. It must also be mentioned that on the same tracks and rail yards there are ethanol tanker cars that are in proximity to population centers in Grays Harbor county. With these concerns I ask these questions to be answered in the Draft EIS.

Response GP220-7

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP220-8

Who provides insurance coverage for the RR and is the amount compatible with the risk? In the event of a spill can the RR just declare bankruptcy without involving their parent companies?

Response GP220-8

Refer to Response to Comment GP220-6.

Comment GP220-9

Will the RR upgrade their infrastructure before any crude is sent to Grays Harbor and will the upgrades be peer reviewed?

Response GP220-9

Refer to Response to Comment GP220-2.

Comment GP220-10

Who provides spill cleanup services to the RR and where are and what are the amounts of spill cleanup equipment available in a spill event? How much man power is available for cleanup and what are the response times that are guaranteed? If response times are not met is their automatic fines and who pays the fines? What is the training required for response providers and is it updated yearly? What is the plan for dilbit (dilute bitumen) from Canada's tar sands- is their now a dependable, verifiable and certified clean up method available for this type of crude?

Response GP220-10

Refer to Response to Comment GP220-3.

Comment GP220-11

What will projected sea level rise be and will the rise effect the RR track bed? If rain fall increases (note- rain fall this spring is blamed for the grain cars falling over) due to climate change will this impact the integrity of the RR track bed?

Response GP220-11

Final EIS Chapter 6, Section 6.5.1.2, *Climate Change*, clarifies predictions of sea level change in the project area and potential for flooding at the project site. With a predicted sea level rise of 1.57 feet in the project area by 2050, the project site will remain approximately 5 feet higher than the projected high tide. As such, it would not be subject to flooding during extreme storm events. Refer to Response to Comment GP220-2 regarding regulatory requirements for track maintenance and inspection addressed in the EIS.

Comment GP220-12

Port facilities in Hoquiam, next to the Grays Harbor estuary, is the destination of the oil trains. What safety precautions will be provided to insure that crude rail cars are safe from potential damage and fires resultant from other local explosion prone business' such as biofuel manufacturing? What precautions will be in place to protect numerous grain silo's from tank car fires and explosions in the event of a catastrophic event?

Response GP220-12

Refer to Response to Comment GP220-3.

Comment GP220-13

Will earth quakes as little as 6.00 on the Richter Scale affect the trains on the tracks at the off loading facilities?

Response GP220-13

Refer to Response to Comment GP220-4.

Comment GP220-14

What is the plan to identify train car contents for local responders given crude and ethanol in proximity to the off loading location?

Response GP220-14

Final EIS Section 4.2, *Applicable Regulations*, describes the requirements identifying and communicating contents of rail cars and identifies mitigation measures to further address coordination with local emergency responders.

Comment GP220-15

What other types of flammable material is stored close by the crude oil cars and do they pose a threat?

Response GP220-15

Refer to Draft EIS Chapter 3, Section 3.14, *Hazardous Materials*, for a description of the types of hazardous materials that are currently stored and used at the project site as well as those that would be used as stored under the proposed action.

Comment GP220-16

Will DOT 111tanker cars be used to haul crude to the Port and tank farms?

These are the questions that quickly come to mind and r reserve the right to expand my concerns as new information comes to light.

Brady Engvall (360) 268 5518

Response GP220-16

Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and the retrofitting of all existing tank cars in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643).

Comment GP220-17

RECEIVED NOV 30 2015

RECEIVED MAY 27 2014

From: Brady Engvall (brady@bradysoysters.com]
Sent: : Monday, May 19, 2014 8:39 AM
To: Brady Engvall
Subject: Comments to CBR lmperium-Westway.

RE: Comments to CBR lmperium-Westway

Dear Sirs,

Crude by Rail (CBR) is coming to Grays Harbor. There are many concerns regarding this product and the methods by which it may be handled. The scope and scale of the proposed tank farms are far beyond anything the estuary has ever experienced. It has been averred that the scale may grow as markets grow and market potential is certainly there. Canadian tar sands dilute bitumen is proposed to be delivered by rail to the tank farms. To date, no known method is available to cleanup tar sand crude efficiently. Crude oil has a legacy of impacting water bodies and shorelines in a negative way. It is difficult to cleanup spills and the fact that it travels with the tides and before the winds it's impacts are great over long distances. These proposed tank farms and resulting ship transits have the potential to impact Grays Harbor, Willapa and ocean beach environments. These bays and beaches provide over 30% of the economic base for both Pacific and Grays Harbor counties.

Spills are inevitable- whether it is a drip, drip over time or a catastrophic event it will happen. Always has and always will. Given that outcome and the potential to destroy a .large part of the economic base of two harbors I have these concerns. Grays Harbor is a sunken valley that needs

extensive dredging by the Corp of Engineers (COE) to keep the channel deep enough to support shipping. One million to 1.7 million cubic yards need to be dredged each year. Dredge spoils are deposited in three locations two within Grays Harbor and one outside the harbor on the Westport ocean beach. Crude oil spilled into salt water spreads and a portion sinks after losing some of its lighter distillates and contacting sediment on the shore lines, beaches and mud flats. Our estuaries are continually being buffeted by ocean swells, wind waves and tides. Heavy sediment always moves to the lowest point in the estuary which are the channels that the COE must dredge. The COE is required to place contaminated dredge spoils in upland locations out of the marine environment.

The questions I have are below:

Does the COE have a dedicated upland spoil site to take yearly contaminated dredge spoils as required? Does the COE have a protocol in place to identify crude oil contaminated dredge spoils as it is dredged? Will open ocean dumping be allowed for crude contaminated dredge spoils? If open ocean dumping is allowed will the additional cost be computed in dredging cost/ benefit analysis? Tanker ships will be used to haul crude away from Grays Harbor to remote markets they load at docks. Presently siltation around the Port's piers are cleaned by clamshell dredges and a water jet array. Where ships tie there will be crude oil accumulations. How will these dredged materials be checked for contamination so that contamination does not get recycled back into the shellfish growing environment? Is there a protocol in place. How will the water jet arrays be monitored for crude contamination and is thee presently a protocol in place? Will each loading ship be preboomed to contain an oil spill. If so, on days and nights that weather conditions prevent prebooming what other precautionary methods will be used to protect against a crude spill? Will there be onsite responders to protect against a spill when a ship is being loaded? What is the alternative plan for rapid spill cleanup when the weather is stormy?

Response GP220-17

No dredging is proposed as part of this proposed action.

Refer to Chapter 2, *Proposed Action and Alternatives*, for a description of the proposed action. The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. For information about the most likely sources and destinations of crude oil related to the proposed action, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

For information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

Section 4.4.3, *What mitigation measures would reduce impacts related to terminal operations at the project site?* includes applicant measures to improve response effectiveness in the case of a spill. More specifically, applicant mitigation includes purchasing an equipment and software package to supplement information on environmental conditions to support oil spill modeling, identify specialized spill response or prevention equipment, and assist with determination of safe and effective conditions for prebooming. Additionally, a licensed engineer would perform an independent engineering analysis and feasibility study to determine the number of days per year it is safe and effective to preboom oil transfers and identify site-specific improvements. If the study identifies no feasible alternative or until the changes are in place, and if prebooming is not feasible, alternative measures would be implemented during oil transfers in addition to those otherwise

required by regulation. However, as noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP220-18

Ballast water is used in tankers when traveling without a load. How will ballast water be handled for tankers coming to Grays Harbor? Will Hoquiam have a pump station for contaminated ballast water? How close to the harbor can tankers discharge ballast water before going over the bar? How is ballast water treated to keep unwanted critters from entering our coastal environment?

Thank you for the opportunity to comment on these proposals.

Response GP220-18

Draft EIS Chapter 3, Section 3.3, *Water*, Section 3.4, *Plants*, and Section 3.5, *Animals*, describe potential ballast water impacts and the regulatory requirements to reduce these impacts. Section 3.4.7.1, *Applicant Mitigation*, and Section 3.5.7.1, *Applicant Mitigation*, identify mitigation measures to further reduce potential impacts.

Comment GP220-19

RECEIVED NOV 30 2015

RECEIVED MAY 27 2014

Brady Engvall

From: Brady Engvall [brady@bradysoysters.com]
Sent: Monday, May 26, 2014 10:04 AM
To: Brady Engvall
Subject: Comments to: lmperium-Westway scoping for EIS

Please include by reference comments by: Quinault Indian Nation, Willapa Grays Harbor Oyster Growers Association and Washington Dungeness Crab Fishermen1s Association.

RE: Scoping for Westway-lmperium EIS.

Three Crude By Rail (CBR) projects are being planned for Grays Harbor. Potential impacts to the natural environment are huge. Grays Harbor relies on an economic foundation based on natural resources. Dungeness crab fishing ($35-$60,000,000 state wide of which GH contributes heavily), tourism ($30,000,000 as reported by the Grays Harbor Chamber of Commerce), razor clam digging ($22,000,000 as reported by the Washington State Department of Fisheries) and oysters ($3,230,500 for Grays Harbor oyster production as reported by Department of Fisheries records). As you can see these Industries are all clean water related. One crude oils pill would threaten these basic industries of which our coastal communities rely. Oil spills happen- it is inevitable and impacts always last long after the spill cleanup crew has declared victory and left the scene.

Response GP220-19

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on fisheries and shellfish.

Comment GP220-20

The following questions need to be addressed in the scoping EIS process-

Statutory requirements of Coastal Marine Spatial Planning requires that existing sustainable uses be protected. How will these historic uses be protected given that just 10-15% of an oil spill cleaned up is considered successful? Which government agency will guarantee historic uses are protected? Is liability insurance high enough to cover all cleanup costs to guarantee sustainable uses as per statutory requirements? Will the public be indemnified for their natural resource losses from an oil spill? What agency can the public petition if long term losses are incurred? Secondary losses by local tourist businesses- are they covered by cleanup damage awards? How far up the natural resource benefit ladder will losses be covered by insurance awards?

In order to identify natural resource losses there must be baseline studies done to identify that which will be lost. Who will do these studies and will the studies be done before any crude oil is delivered to Grays Harbor? It is not only the estuary that studies must be conducted but from Centralia to the far end of ocean beaches north and south as this is the natural habitat that is all interrelated. Who will be responsible for sediment studies as these are very important for crude oil spills as tidal conditions and time will not allow much cleanup on the mud flats after a spill? How will crude oil combine with mud and sand to make tar balls and will tar balls remain stationary or will they be moved around by wind and currents to different locations over time? Because the Corp of Engineers must dredge the Grays Harbor navigation channel yearly will tar balls and errant crude be dredged up over time? If so, where will these contaminated dredge spoils be discharged and who is responsible to make sure these spoils don't get redeposited in the estuary?

Response GP220-20

Refer to Response to Comment GP220-6.

Comment GP220-21

Through the whole process of the coming EIS it has been stated (over and over again} that only American crude can be shipped out of Grays Harbor because of federal law requirements. But in truth something else is reality. The railroads have said that they have to haul legal products,

American and Canadian. The Canadian product is tar sands crude- the worst possible product to spill into a marine and fresh water environments. It sinks and it defies cleanup by its very nature of being very heavy and the need for solvents to make it pumpable. Because local folks cannot control what comes to our shores there is a real possibility that Grays Harbor would become the tar sands crude oil North American export point. Given that does Department of Ecology (DOE) have a tested, peer reviewed, effective way to clean up tar sands crude oil? Can and will DOE demonstrate their methods for crude oil clean up? Will the US Coast Guard demonstrate effective clean up methods and response times. If cleanup is impossible what are the long term (peer reviewed) impacts our water bodies will experience? Is there sufficient insurance funds for full restitution to fisheries, tourism and to public citizen benefits of a healthy environment we all depend on?

Thank you very much for the opportunity to comment on scoping for the coming EIS. And- in the end when all has failed and the developers have packed up their "carpet bags" and fled to more comfortable environs and have left the public to wallow in their misery we can say, "we tried but no one listened". Please listen!

Brady Engvall (360} 268 5518

Response GP220-21

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

GP221, **Engvall, Korry**

Comment GP221-1

RECEIVED OCT 07 2015

Comments to the Draft EIS lmperium and Westway Expansion Projects. Dear Sirs, I'm part of a large family making their living from the ocean and estuary. The DEIS does not address potential habitat issues that these two projects bring to our family and other fisher families. In the event of a crude oil spill, which is inevitable as history teaches, valuable ocean and estuary habitat will be lost. Habitat that our local citizens rely on for survival.

Response GP221-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including aquatic habitat.

Comment GP221-2

There is no baseline studies in the estuary that lists what habitat will be lost if a spill occurs. The DEIS has the responsibility to list potential habitat degradation and the consequences to the environment so restoration can be achieved. An example would be dilbit or dilute bitumen which is produced from Canadian tar sands. This type of crude oil sinks as it is heavier than water. Current crude oil recovery technology does not address oil that sinks. There has not been any studies that explains bitumen behavior in estuaries such as Grays Harbor. From a recent spill of dilbit in the Kalamazoo River we learn that it is very expensive and nearly impossible to clean up the mess. Also-historically when a spill happens the responders gather just 14% leaving the rest to degrade in the environment. This is unacceptable. The DEIS must include a section on dilbit as well as Bakken crude and how it impacts the marine environment when it is spilled and what it would mean for Grays Harbor and the ocean.

Better yet the two projects should be rejected by Hoquiam and DOE as the risks are too high and the rewards are too small for Grays Harbor.

Aberdeen, WA. 98520

Response GP221-2

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* reflects additional information on the economic and social costs of oil spills. This includes information on derailments and other accidents involving trains carrying crude oil and information on a crude oil spill during marine transport.

GP222, **Engvall, Luella**

Comment GP222-1

Dear Sirs, I attended the morning session of the public hearing for these two projects at Elma. It was evident that the pubic does not support these projects. If the public was in support where were the supporters and where were their oral comments in support? Lets hear them! The purpose of these hearings on the draft EISs is to identify issues that were not covered in the drafts.Here are my comments to the weakness' and incomplete nature of the drafts.

Our family is a fishing family. We have over 14 family members on the ocean and bay that make their living from fishing and oystering in the ocean and estuary. The draft does not cover just how our family members will be supported financially if a spill occurs. Under adverse conditions a spill will be all over the bay and into the ocean within an hour of a spill. The DOC Global Spill Response Plan ironically calls for local fishermen to help with the cleanup. Yet again-cleaning up someone else' mess. The fishermen know how spills are treated by business' as from California to Alaska business fight any attempt to make fishing families whole after a spill event.

The Exxon spill in Alaska is still being litigated and the New Clarisa spill in Coos Bay was litigated by oyster farmers to the bitter end. The oyster growers were never made whole and in Alaska the effects of the spill are still impacting fishing resources. That's what history tells us about oil and fisheries. The draft EIS should out line any and all insurance resources that are compliance bonded to help make fishermen whole in case of a spill .As an example of spill cleanup costs- A few years ago a crude spill happened in Michigan on the Kalamazoo river. One billion dollars have been spent and the spill is still not cleaned up.

Response GP222-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS. The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP222-2

The draft EIS also does not realistically address potential spills along the RR line from Chehalis to Hoquiam. Really- a spill in these locations, over 100 stream crossings, would leach into the harbor and river system for years and impact the publics resources.

As shellfish growers only a sheen is enough to stop all shellfish farming and negative impacts to salmon smolts would happen as well. Tide pools that harbor crab larvie and Year of the Young crabs would also not survive the spill impacts.

Response GP222-2

As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion. For information about the assumptions, data sources, and methods used in the analysis of risks, refer to the Master Response for Risk Assessment Methods.

Comment GP222-3

The rail lines into GH are old and faulty. Rail cars just plop over on occasion and derail more often. The draft EIS should address these issues with a guarantee all rail lines in the area be brought up to mainline specifications before any crude oil visits Grays Harbor county.

Response GP222-3

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP222-4

Fully 30% of the income of GH county is marine related. In the case of a spill that would be lost. That is an impact that can't be mitigated and should be covered in the draft identifying sources, impacts and potential long term effects of an oil spill. Thanks for the opportunity to comment on the DRAFT EIS. Luella Engvall 3714 Oyster Pl. Aberdeen, WA. 98520

Response GP222-4

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on*

Resources, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on aquatic resources.

GP223, **Estalilla, Francis**

Comment GP223-1

I am submitting these comments in OPPOSITION to the proposed Westway and Imperium expansions. 1) The railroad parallels the lower Chehalis River for much of its length. Because of the dilapidated condition of the railway into Grays Harbor, derailments are a chronic and recurrent problem. An oil spill from these tracks would discharge directly into the tidal Chehalis River where strong currents would rapidly disperse the toxic goo upstream and downstream before it could ever be contained. This threatens the sensitive riparian and estuarine habitat that supports salmon, steelhead, and sturgeon; many species of wading/diving birds; beaver, river otter, and other marine mammals; and a whole host of important microfauna not even visible or apparent to the casual observer.

A major oil spill from either of the storage facilities or an outbound oil tanker ship would discharge directly into Grays Harbor where strong tidal exchanges over an expansive low-gradient estuary could rapidly contaminate vast swaths of the bay, as well as the ocean beaches to the north and south. Containment would be nearly futile if not impossible, especially during our storm-prone winters. Such a catastrophe would not just threaten a way of life for locals but also soil one of the state's most valuable coastal playgrounds. Hundreds of thousands of visitors come to boat, hike, camp, hunt, fish, kayak, surf, swim or simply WATCH in awe the myriad species of riverine and marine wildlife… and appreciate the clean unsoiled land- and sea-scapes they call home. Oil contamination also poses a major risk to commercially- and recreationally-harvested oysters, clams, crab, salmon, bait-fish and bottom-fish…. all of which are vitally dependent on a clean healthy marine ecosystem. These CLEAN RENEWABLE and SUSTAINABLE industries, valued in the 100's of millions of dollars, are incompatible with an estuary turned toxic oil zone. In that context, crude oil expansion is neither clean, renewable, nor sustainable for our community.

Explosions have proven to be a recurrent risk to the industry. This threatens not only the host storage city of Hoquiam but also EVERY town situated along the railway into Grays Harbor. It's not a matter of "if" but "when". Let's be clear here. People WILL die and many others WILL become ill due to toxic fumes and contamination from an explosion. This is a predictable risk to human life and public health that CANNOT be mitigated

Response GP223-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or within Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts,* presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be

significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP223-2

Seismic and potential tsunami events are an unavoidable reality in the Pacific Northwest, and Grays Harbor is as vulnerable as they come. With the knowledge of the certain devastation a spill or explosion poses to our citizens, willfully and irresponsibly locating, or worse yet, expanding an oil storage zone here is simply courting disaster for the community.

Response GP223-2

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP223-3

The proposed initial volumes of oil train traffic will cause tremendous chaos to the existing traffic and commerce in Aberdeen and Hoquiam. And that's just the tip of the iceberg. Once the way is paved, ever greater volumes of oil train traffic are sure to follow. The additional oil trains WILL block traffic in and out of an already congested Gateway Mall – Walmart complex which includes major retailers, restaurants, financial services, and even a medical office (eye clinic). Thousands of patrons and employees are literally trapped every time a train transits through the area. On one hand this could be dismissed as a trivial personal inconvenience, but on the other hand, it could just as easily and unnecessarily delay access to critical care in a life-threatening emergency. The additional oil train traffic can only exacerbate this problem. How ironic would it be if the medical crisis were an oil-related incident and the oil train was blocking the ONLY access for emergent medical care in or out of the site? Respectfully yours Francis V. Estalilla, MD

Response GP223-3

Comment acknowledged.

GP224, **Estalilla, Francis**

Comment GP224-1

Good afternoon, folks. My name is Dr. Francis Estalilla. I'm an eye surgeon here in Aberdeen. I'm here for now my 22nd year, and I'm here to speak out in opposition of oil by rail, oil by boat, whatever. It's a bad fit for this space. Simply said, it's a bad fit for this space.
I'm a part of this community. I live here, I've got friends, I've got family, I've got patients here. They're all threatened by this. Okay?

I love taking my friends out fishing. I was out on the bay today. It was a great day looking at that pristine water out on the bay catching King Salmon, Coho Salmon, wild fish produced in the Chehalis Basin, estuaries and the rivers of Grays Harbor.

This is why I'm here. This is the only reason I'm here. I make a living here. But by golly, if it weren't for these fish, I wouldn't be either. Ask anyone in this audience. Ask anybody who knows how to fish.

Simply said it's time to stay no. It's a bad fit. The question you must ask yourselves is it worth the risk? Is it worth the risk? The answer is simply no, no, no. Not just no, but hell no.

Response GP224-1

Comment acknowledged.

GP225, **Evans, Susan**

Comment GP225-1

Greys Harbor is a sanctuary for migrating shore birds. One of the largest populations of shorebirds in North America can be seen there in the spring. It is our obligation to protect this area from the catastrophic consequences should there be an oil spill. My fathers ashes were scattered at Greys Harbor because it is the most important birding site he ever saw. And that is after 80 years of birding all over the country. In addition it is time to embrace an economy based on renewable energies, not fossil fuels. The 20 plus oil, coal and gas terminals proved along the west coast only fuel the climate crisis. Please say No to destroying Greys Harbor.

Response GP225-1

Comment acknowledged.

GP226, **Fargo, Rich**

Comment GP226-1

I am viciously opposed to this plan. The ecosystem that makes up Grays Harbor is one of the most diverse in the world. Even the greatest track record has an "OOPS" in it. And when it comes to oil, one "OOPS" means decades of dead habitat and creatures. Keep your oil out of our homes!! WE DON'T WANT IT! NOBODY DOES!! Every single person I have talked to hates the idea of endless trains, explosive material, and the possibility of a spill.

We have lived here our entire lives, and will be damned to let oil companies do what they want with our homes. In today's society we need to GET OFF of fossil fuels. Not pump a ton of tar sands out of the ground, and get what scraps we can there. Makes ZERO sense and only lines the pockets of the oil company elite and a SMALL HANDFUL of jobs.

[Photo of man fishing not reproduced.]

Response GP226-1

Comment acknowledged.

GP227, **Farra, Jackie**

Comment GP227-1

Good afternoon, Panel. My name is Jackie Farra, and I'm a citizen of Grays Harbor County, and a homeowner in Ocean Shores for the last 27 years.

I have hardly any words to say to you except do not do this. Common sense should bring it to a point that this will destroy our fishing industries. I have family and I have daughters that have come with their grandparents to Westport for many, many years in a row fishing for salmon and enjoying our Pacific Northwest.

We don't need this company here. They need us to want them here and pay for them, and we cannot pay for our lives. It's about money for them, it's about livelihood for the rest of us.

I urge you, please, please do not permit any oil transport to Grays Harbor County. I've gone by the rails many, many times, and right now, yes, they have done a lot of improvements, so it appears, in the downtown district. However, there will be absolutely no way to escape that downtown that we're trying to recover from economically.

Economically Grays Harbor does not need this business. I agree with what's been said before me, we need to get our heads together and get green businesses in here and make us well again. We're on that road, we don't need a setback. Thank you.

Response GP227-1

Comment acknowledged.

GP228, **Farrell, Jenny**

Comment GP228-1

Name: Jenny Farrell
Organization Name (if applicable): St. Patrick Church
City/State/Zip: Seattle, WA 98178

My comments relate to both the Westway and Imperium Draft EISs.

There is no way to mitigate the dangers of these crude oil terminals, Grays Harbor is an unsafe place for oil terminals. Also, it is a major earthquake & tsunami zone. Please keep our natural habitat safe and avoid any crude oil in our waterways.

Response GP228-1

Refer to the Master Response for Mitigation Framework and the Master Response for Seismic Risk and Design Requirements.

GP229, **Feltham, Wendy**

Comment GP229-1

I am writing to express my opposition to both the Westway Expansion Project and the Imperium Expansion Project. Thank you for providing the fact sheets and the opportunity for public comment. I am gravely concerned about the increase in transport of highly flammable crude into an area famous for its coastline and estuary visited by migrating birds. The potential for accidents and destruction is just too great. We have seen that accidents happen too frequently, they are too destructive, and they are impossible to clean up. The devastation caused in the recent Lac-Mégantic railway disaster is an example. I believe the coast of Washington should be preserved for recreation

for future generations, and protected for marine mammals, birds, marine invertebrates and native plants.

Response GP229-1

Comment acknowledged.

GP230, **Ferguson, Ken**

Comment GP230-1

Hi, my name is Ken Ferguson. And I'll claim Multnomah County, Portland as my residence.

Of course we know that we've currently had a number of issues with oil trains moving through the Columbia Gorge National Scenic area. And so these trains would likely trend that same corridor.

I would like to underline the necessity of ensuring that the Quinault Indian Nation people exercise their treaty rights under the treaty of 1855. This will definitely impact all the unusual and custom sites in terms of, you know, water quality, air quality.

I want to underline everything everybody said about, you know, danger, environmental contamination, threats to water, threats to fisheries.

These are also things that these nations consider sacred, and so this is impacting also their religious rights. So these are things I think need to really be considered outside the scope of an Environmental Impact Statement.

And also the fact that these terminals don't even exist in a bubble. There's a regional infrastructure that communities all over the region are fighting to prevent, as well as coal and LNG.

This is part of a global war for energy supremacy. So like right now we have, you know, Russia turning to Syria, which of course you know that whole entire region is a lynchpin for global warming.

So Grays Harbor is a pawn, but sometimes the pawn can help put the king in checkmate. So, you know, we have all these things occurring around the world. And a hurricane maybe as large as, you know, Sandy to the Eastern Coast of the United States down to the Caribbean.

So these things are all happening right now in our world and you can't just consider these terminals as, you know, existing in this bubble. And so I think it's interesting, first of all, that we come here to the site of another failed scheme to consider entering into possibly one just as dangerous. Thank you.

Response GP230-1

Comment acknowledged.

GP231, **Ferguson, Ken**

Comment GP231-1

My name is Ken Ferguson. I live in Portland, Oregon, part-time resident of White Salmon, Washington, which is -- the BNSF tracks run right through there. So there's a lot of concerns from the Columbia River Gorge, Columbia River Water Shed, Chehalis Water Shed, all the communities located everywhere along the transportation -- this explosive oil track.

The fact that there's even -- this is even being considered from an ecological standpoint is ridiculous. I would ask Paula Ehlers to do everything you can to ensure that those permits are denied. You need to stand up to oil. We have a lot of people -- hundreds of people came here to stand up to oil. But what we need is a representative in government to stand up to oil. Please deny these permits.

I also have concerns about all Nations under the treaty of 1855 and ensuring that the uniform custom sites for the Quinault Nation and members of the treaty and Chehalis. You must ensure that their ability to exercise that -- those treaty rights are not threatened.

This project threatens not only the Quinault, the Chehalis, the Cowlitz, the Yakama, Warm Springs, you've had people travel from other reservations to speak out from their nations. These are sovereign nations. That is a nation-to-nation arrangement that we need -- you need to make sure that you have prior informed consent from all of those nations throughout the entire transportation route to ensure -- please deny the permits.

All of those nations do not want to see this project and this structure go through. Stand up to oil. We need one of you to. Deny these permits.

Response GP231-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP232, **Ferra, Jackie**

Comment GP232-1

Good evening. My name is Jackie Ferra. I'm speaking on behalf of myself this evening and my community of Ocean Shores. I don't have a lot to say because I'm so ashamed of what's been going on here. I wish I was not here tonight to have to tell you that you should all go away right after you say no. And, Brian, I'm especially upset with you, I guess, because of your position where you were able to deny this a long time ago along with port commissioners.

I'm appalled that these money sucking people would come here and try to destroy our area and only feel worse when I think that it's going to be allowed, in some of your minds. It's not going to be allowed in mine. It's not going to be allowed in the minds of the nation -- Quinault Nation or any of these people that are here tonight or today during the rally.

Please reconsider this and think with your hearts a little bit. It's embarrassing to be in the human race and have you want to be in favor of destroying any part of the mother earth.

Response GP232-1

Comment acknowledged.

GP233, Ferraro, Natalie (Friends of the Columbia Gorge)

Comment GP233-1

Thank you. My name is Natalie Ferraro. I'm with Friends of the Columbia Gorge. I live in Vancouver. I wake up in the morning to the sound of trains, but we're here to talk about environmental impact. And this draft is focused on local impact of this project.

The environmental impact of these terminals not only affects Grays Harbor, but this county, across our state, our nation, and our world. You heard today from citizens how these terminals would threaten their safety, their health and well-being. And I urge you to consider the no action DEIS.

Increases in train traffic would severely affect the safety of every town that these trains go through from Vancouver, Spokane, and over to our state. Increases in train traffic will endanger the habitat in the Columbia Gorge, which is already fighting environmental impact from existing train track. And we're here today to talk about their impact and we need to make sure we talk about all of them.

Thank you.

Response GP233-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Final EIS Chapters 5 and 6, *Cumulative Impacts*, have been revised to clarify the existing risks and the risks under the no-action alternative and the proposed action in the extended study area, individually and cumulatively.

GP234, Ferraro, Natalie (Friends of the Columbia Gorge)

Comment GP234-1

My name is Natalie Ferraro, and I'm from Vancouver, with Friends of the Columbia Gorge.

History and research have shown that transporting oil by train is a dirty and dangerous process. The construction of either of these projects would increase train traffic in the Columbia Gorge National Scenic area as well as in several other places that are designated parks, wildlife refuges and sensitive habitats. These areas are already experiencing negative impacts from train traffic at its current levels.

Throughout the region, communities in which projects like these have been proposed have all stood in opposition. We are proud of our beautiful home and share a commitment to keeping it healthy. I stand with these communities in saying no oil by rail now or ever. Thank you.

Response GP234-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 further describes the potential risks associated with rail transport in this area. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP235, **Figlar-Barnes, Jarred**

Comment GP235-1

Comments and Questions to the Department of Ecology and the City of Hoquiam for the Draft Environmental Impact Statements for the Westway and Imperium Proposal's;

1. Is Crude Oil a renewable energy? If not, I would suggest Renewable Energy Corp is misleading the public, through false advertising, of their true intent. If they wish to pursue their Crude Oil Project further, I ask that they change their name to reflect their actual business practices, so that they are no longer misleading the public about their company's true purpose. Simply adding the word *'Non'* before Renewable in their company's name would be a quick and acceptable fix. A better alternative, if they want to keep their current name, would be that ask they drop their project and pursue the production of Biofuel at their Grays Harbor Facility (Imperium Renewables), which was the original purpose of the facility. Then they would no longer be misleading the public.

Response GP235-1

Comment acknowledged.

Comment GP235-2

2. In the DEIS, rail traffic noise impacts were addressed in detail for the City of Elma. However, increased **rail traffic impacts on car and emergency vehicle blockage** to the north side of the PSAP in Elma were not provided in detail. Rather, an average wait time was derived along the segment of railroad from Centralia to Aberdeen. Elma was omitted from this part of the study. Elma has 11 rail crossings, and with 900 plus people living on the north side of the tracks, I would ask that the EIS include a detailed study of the impacts the increased train traffic would have on the City of Elma including wait times, be it vehicle impacts or emergency access being cut off.

Response GP235-2

Draft EIS Appendix L, *Vehicle Traffic Analysis*, illustrates the estimated daily average and peak hour delay at all at-grade crossings on the PS&P rail line, including the crossings in Elma, for the analysis years (2017 and 2037). The estimated vehicle delay at grade crossings would be for all vehicles, including emergency response vehicles.

Comment GP235-3

3. Oil Train Explosion and Fire Mitigation. There are only two major mitigation measures shown for the potential derailment and explosion of crude oil trains along the PSAP. First, an annual training

day with local emergency responders, and second, a foam truck to be given to the City of Elma Volunteer Fire Department. I ask that the foam truck and yearly training day both be removed from the list of mitigation measures for the following factual reasons;

- Of the 14 large CBR derailments and fires/explosions that have occurred across the US and Canada, almost all were too dangerous for fire crews to fight let alone approach. Due to the risk of further explosions, and toxic smoke issuing forth from the burning cars, emergency responders and the public have often been evacuated to a distance of several miles, and emergency responders have been told to simply let the oil tank cars burn themselves out. Even in Lac-Mégantic, when the train exploded in the center of town, killing 47 people, emergency responders were forced to let the blaze burn out, as it was simply too dangerous to fight.

- A foam truck provides no use parked miles from a train accident if it is too dangerous for first responders to fight the fire. As has been the case in most of the 14 derailments, and as would be the most likely case if a derailment and explosion were to occur in Grays Harbor.

- Foam trucks are only effective as long as they have foam. Presuming that the truck can actually reach and fight an oil train fire, the amount of foam available can run out incredible fast, especially if the fire is burning hot and intense. Thus, as soon as the truck runs out of foam, it becomes obsolete, unless further foam is provided. Will further foam be provided to the Elma Fire Department? If so, how much?

- Yearly training to fight CBR fires is great, but provides little use when a derailment and resulting fire and explosion are too dangerous to approach, even in a city where people's lives are at stake, the heat alone from one of the explosions can prevent first responders from looking for survivors close to the derailment. How will this be addressed?

- Simply not permitting these projects would be the most effective way to mitigate the potential of a spill, explosion or fire along the PSAP Railroad. Why is a no-build scenario not included as a viable alternative in the DEIS?

For the reasons stated, I again ask that the two mitigation measures listed for fire and explosions from derailments in the DEIS be removed. Instead, I would ask that the EIS simply state that there are no effective feasible mitigation measures in the real world that can completely mitigate the potentially dire and tragic possibility of a CBR derailment, fire and explosion. I would ask that the same reasons above also be applied to the possibility of a terminal fire, ship crash or grounding and storage tank rupture and explosion.

Response GP235-3

Refer to the Master Response for Mitigation Framework for an explanation for how mitigation was proposed. Additionally, Final EIS Chapter 4, *Environmental Health and Safety*, proposes additional mitigation measures to address in part local first responder capabilities. As noted in the comment and in the Draft EIS, no measures can completely eliminate all risks.

Comment GP235-4

4. The potential exists for the export of Heavy Tar Sands crude from Canada through these proposed terminals. Heavy crude oil, when spilled, sinks instead of floats when spilled. Thus the spill mitigation measure of booming would become almost completely obsolete. I would ask that the EIS reflect this reality, and state explicitly that booming, in ideal conditions, is only effective for lighter

crudes, if effective at all in the varied and unpredictable weather conditions of the Washington coast. How well will current spill response measures work with heavier Tar Sands Crude Oil? Will this scenario be included in the EIS? If not, why?

Response GP235-4

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action.

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods.

To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP235-5

5. Will the increased train traffic on the PSAP associated with these terminals (over 1,500 additional trains a year loaded and empty), cause more train related fatalities each year? With no fencing to keep people from trespassing on railroad property, and with hundreds of people regularly trespassing on the tracks in all of the communities on the PSAP (including kids heading home from School in Elma, and many people during the summer at the Wynoochee Railroad Bridge [which you can actually see in Google Earth Satellite Imagery using historic imagery]), with all this in mind, what is the expected loss of life associated with the increase in rail traffic?

Response GP235-5

The Draft EIS does not evaluate potential increased fatalities from increased rail traffic on the PS&P rail line. Refer to the Master Response for the Purpose and Focus of the EIS. Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, includes information about the requirements for PS&P to provide information at grade crossings (toll-free phone number, crossing identification number, and warning devices) and PS&P's participation in Operation Lifesaver, a nationwide public education program to help prevent collisions, injuries, and fatalities at highway and rail grade crossings. These programs address the dangers of at-grade crossing.

Comment GP235-6

If proposed quiet zones are set up in cities like Elma… meaning trains will no longer blow their horns at crossings, will this increase the risk of fatalities and injuries if those kids and teenagers on

the tracks can't hear the trains coming as easily? How many people are expected to be hurt or injured by trains each year? How often are fatalities expected to occur? Where are these fatalities most likely to occur (in the cities, suburbs, rural, county)? What mitigations measures will be required to reduce illegal trespassing? Will mitigation be required at all? If not, why? As these proposals directly contributes to the increased rail traffic and thus any resulting fatalities and injuries, what will the EIS do to address this issue?

Response GP235-6

Quiet zones are described in Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*. To qualify for implementation, grade-crossing quiet zones must undergo a feasibility study and safety risk assessment, and be approved by the Federal Railroad Administration in cooperation with all applicable jurisdictions. Regarding mitigation for the proposed action, refer to the Master Response for Mitigation Framework.

Comment GP235-7

6. The proposed facilities for both Westway and Imperium (Renewable Energy Corp.) will be highly automated, with plenty of computer systems. In this day and age, computer systems have been found to be highly vulnerable to hacking and cyber-attacks, regardless of what safeguards they have in place. What measures will the facilities have in place to prevent or limit the threat of a cyber-attack? Will the facilities have adequate fail-safes in case of a cyber-attack? And what are the worst case scenarios if a full-scale cyber-attack happened to each facility?

Response GP235-7

Refer to the Master Response for the Purpose and Focus of the EIS.

Comment GP235-8

7. The United States Navy and US Military list the PSAP as part of the Strategic Rail Corridor Network (STRACNET), meaning the PSAP is of great importance during times of war for the movement of troops and supplies… as was the case during the early 2000's when tanks were transported by the PSAP to the Port of Grays Harbor for shipment to the Middle East… the PSAP also provides the only rail connection to the Bangor-Trident Base on the Kitsap Peninsula, and thus provides the only safe land route for nuclear missiles to be transferred on. How will the substantial increase in train traffic on the PSAP effect the local and regional military readiness during disaster and/or war? What is the Navy's opinion of this and have they considered potential impacts to their operations during times of disaster and/or war?

Response GP235-8

Draft EIS Chapter 3, Section 3.15.4.7, *Current PS&P Rail Line Capacity and Operations*, presents the results of the rail modeling analysis of the PS&P rail line capacity. Based on this analysis, the addition of 1.25 trains per day on average to baseline trips would result in approximately 4.25 train trips per day along the rail line, which is approximately one-third of the capacity of the line.

The Department of Navy did not comment on the Draft EIS.

Comment GP235-9

8. A major concern many have with the shipment of Crude Oil by Rail, specifically Bakken Crude Oil by Rail, is the fact it's highly explosive. This makes these trains, unfortunately, an easy target for terrorism, be they abroad or homegrown threats. How will the PSAP Railroad and the Department of Homeland Security insure the security of these trains as they are shipped through our communities? Will the 70 miles of the PSAP that these trains have to cross be secured to prevent illegal trespassing, tampering and or willful destruction of railroad property for the intent of causing harm? What effects would potential terrorist targeting oil trains have on the PSAP's STRACNET readiness?

Response GP235-9

Refer to the Master Response for the Purpose and Focus of the EIS.

The Pipeline and Hazardous Materials Safety Administration (PHMSA) regulates the movement of hazardous materials. PHMSA's Hazardous Materials Regulations require any person shipping a number of regulated hazardous materials (including crude oil) to develop and adhere to a safety and security plan that must address personnel security, unauthorized access, and *en route* security. The Federal Railroad Administration is responsible for enforcing the Hazardous Materials Regulations related to the movement of hazardous materials by rail.

Comment GP235-10

9. Spill Response: there are over 100 creek and river crossings on the PSAP mainline, and numerous wetlands, including the extremely unique, fragile and important Chehalis River Surge Plain. Where along the rail line will booming and spill response equipment be placed to provide adequate spill response time to any of these numerous creeks, rivers and wetlands? Will the railroad be required to place spill response equipment along its tracks as a proactive measure for any potential spills? If not, why? What are the costs to fish and wildlife if one tank car spills into a small creek (like Dry Bed Creek in Elma) or a large creek (Like Sylvia Creek in Montesano) or a large creek/river (like the Cloquallum in Elma)? What about 2 tank cars in the above scenarios? Or several? What kind of spill response equipment and spill response time would be needed to adequately stop a spill of any of these sizes? What is the most realistic spill response time likely to be along the PSAP?

Response GP235-10

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Final EIS Section 4.2.2, *What framework prepares for an incident?* has been revised to indicate that railroad operators would be required to develop spill contingency plans consistent with state requirements and a mitigation measure is proposed for a contingency plan to be submitted to Ecology until state requirements are in place. Nonetheless,

mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP235-11

10. Railroad Maintenance: What are the exact, explicit, and detailed list of upgrades the PSAP will be required to make in order to handle the substantial increase in train traffic associated with these proposals? Will they be required to upgrade their tracks at all? If not, why? If so, will they pay for the upgrades with their own money? Or will they seek taxpayer money for these upgrades? If taxpayer funds would be required, and since these upgrades would be for the proposed oil terminals, would these extra costs to the taxpayer be included in the EIS under financial impacts?

Response GP235-11

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspection* describes PS&P ongoing maintenance and inspections, including future maintenance projects from the PS&P capital improvement program such as ongoing and periodic maintenance projects designed to maintain current capacity, safety, and operations. These projects address the normal wear and tear of a rail line and will be needed as more trains (or more cars) transport commodities along the PS&P rail line. The actual scope of these projects may vary depending on future rail traffic volume and the needs of PS&P's rail customers and would be determined based on applicable regulatory requirements. Any future improvements to the rail line would be would likely be privately funded.

Draft EIS Chapter 3, Section 3.15.4.5 also describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP235-12

11. If a crude oil train derailment and explosion occurs along the railroad, and results in substantial loss or property or life, who will pay for it? Does the PSAP Railroad have adequate insurance to cover the worst case scenario? If the proposed oil terminals and storage tanks were to have a large explosion, resulting in substantial loss of property and life, who will pay for it? Do the Westway or Imperium (Renewable Energy Corp) companies have adequate insurance to cover the worst case scenario at their future facilities? Their current facilities? If no to the above questions, they why ae these companies not required to carry insurance that will cover the maximum cost of a worst case scenario? And if not the companies, who will pick up the tab for a worst case scenario? Local Government? Cities? The State or federal Government? The Taxpayer? Can the companies listed above (PSAP, Westway, & Imperium (Renewable Energy Corp)) file for bankruptcy to void any

responsibility or liability for a worst case scenario? If so, then what funding sources will cover the worst case scenario? Will these funding sources be able to cover all the cost of a worst case scenario?

Response GP235-12

Draft EIS Chapter 4, *Environmental Health and Safety*, Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP235-13

12. What effect will increase rail traffic associated with these proposals have on smaller business that rely on the railroad for shipping their products? It's been shown across the country that smaller businesses who rely on the railroad for shipping their products are often given lower priority for shipping than larger companies with bulk products being shipped. This lower priority often results in smaller business being forced to switch to more expensive means of transportation (truck or plane) or in worse cases, actual force smaller businesses out of business entirely. How will the bulk shipment of crude oil on the PSAP railroad effect smaller businesses priority when it comes to shipping their own products? Regardless of the rail lines capacity, there will be an impact to shipping times for smaller business, so what will this impact be?

Response GP235-13

Draft EIS Chapter 3, Section 3.15.4.7, *Current PS&P Rail Line Capacity and Operations*, presents the results of the rail modeling analysis of the PS&P rail line capacity. Based on this analysis, the addition of 1.25 trains per day on average to baseline trips would result in approximately 4.25 train trips per day along the rail line, which is approximately one-third of the capacity of the line. Therefore, no additional analysis was deemed necessary.

Comment GP235-14

13. What are the proposed terminals lifetimes? How much crude oil is expected to be shipped out of these terminals over their entire lifetimes? (a range is fine)…. How much Carbon Dioxide, methane and other greenhouse and toxic gases will be emitted by these facilities over their lifetimes? How much Carbon Dioxide, methane and other toxic gases will be released into the atmosphere by the eventual refining and burning of the crude oil that will be shipped through these terminals over their lifetimes? What effect will these greenhouse gasses have to the planets climate? How much will these emissions contribute to global warming and climate change? Or to sea level rise and ocean acidification?

Response GP235-14

Table 6-7 in Draft EIS Chapter 6, Section 6.5.1, *Air*, presents proposed daily throughput of crude oil for each of the cumulative projects compared to national average throughput of crude oil. The EIS evaluates the potential impacts over the anticipated lifetime of the proposed action, which is represented by conditions anticipated in 2017, the first year of operation, and 2037. Refer to Master Response for Baseline and No-Action Alternative.

Section 6.5.1 presents estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the cumulative projects in the context of emission inventories and reduction goals. The Final EIS section has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination.

Section 6.5.1 also describes the projected impacts of climate change in the Pacific Northwest.

Comment GP235-15

14. The tank cars the crude oil will be shipped in have vents to relieve pressure inside the tanks by venting excess gases. Some of these gasses are remnant from the fracking process in North Dakota used to extract the oil. Many of the chemicals used in fracking are proprietary due to copy right laws. But, as these gasses and chemicals will be venting from these tank cars all the way to Grays Harbor, passing through countless communities, schools, clinics, parks, hospitals, it becomes a substantial matter of public safety and health to know what is being vented, regardless of copyright laws (one would hope human rights and constitutional freedoms of US Citizens trump corporate copyright laws). So in the interest of public safety and health, what gases are expected to vent from these tanks? Over what temperature extremes will certain gases vent? Are toxic fumes expected more during summer than winter (these tanks are black, ergo they will heat up substantially more in the summertime and increased sunlight)? How will these fumes effect individuals with health problems, such as asthma or emphysema? Can these gasses and chemicals get into the human bloodstream? What effects to the human body can these chemicals cause? Are they bio-accumulative? Will fish and wildlife along the tracks exposed to these fumes and chemicals increase the concentrations of the chemicals incrementally up the food chain? Can these chemicals react inside the tank cars as they're traveling to create new compounds and chemicals that may be worse than the originals?

Response GP235-15

PS&P is required to adhere to all applicable regulatory requirements intended to ensure the safe passage of rail freight. Final EIS Chapter 4, Sections 4.4.3, 4.5.3, and 4.6.3 identify additional mitigation measures to reduce risk of an incident that could result in the release of crude oil. Section 4.7, *Impacts on Resources*, describes potential human health impacts related to a release of crude oil.

Comment GP235-16

15. Vibrations: In Elma, I live about a half mile away from the PSAP Railroad, however I can always tell when a train goes by at night as parts of my house will vibrate slightly (windows mainly). With an increase of 1,500 trains a year (loaded and empty), how will the increased vibrations from these trains effect nearby buildings and structures? We have many old bridges and historic structures in Grays Harbor (especially the Aberdeen/Hoquiam area), how will the increased vibrations effect these structures? How will soft soils (fill and clays) and easily liquefiable soils that are found abundantly in the Chehalis River Valley and Estuary (Aberdeen/Hoquiam) effect the vibrations as they travel? Will the vibrations be amplified by these types of soils? Could this cause increased damage to already damaged buildings like those found in downtown Aberdeen or Hoquiam? What impact would increase vibrations from these trains have to highly saturated hillsides along the tracks? Would this increase the likelihood of landslides across the tracks?

Response GP235-16

Groundborne vibration from trains is associated with perceptible vibration in buildings, including noise that is audible inside buildings (e.g., rattling windows). Although this vibration may annoy humans, it rarely causes any kind of building damage. Groundborne vibration from trains does not cause seismic-like activity such as landslides. Draft EIS Chapter 3, Section 3.7*, Noise and Vibration*, provides an analysis of noise and vibration impacts related to the proposed action that would occur in the study area.

Comment GP235-17

16. What impacts will the increased train traffic have on the PSAP railroads existing infrastructure? Its bridges and culverts? As many of these bridges and culverts are very old (80 years plus), how will the increased train traffic impact their life expectancy? How long will the increased trains be able to run before some of these bridges and culverts will need to be replaced? Will the PSAP railroad be required to actively maintain these bridges and culverts? Or will the practice of deferred maintenance be allowed to continue as has been the case since the rail line was sold by BNSF? Wil the PSAP be required to pressure wash and paint their metal rail bridges, as is the normal practice by most department of transportations and railroads in the country (almost all the PSAP's metal bridges are in dire need of painting)? Or will the bridges be allowed to continue to weather and rust?

Response GP235-17

Refer to the Response to Comment GP235-11.

Comment GP235-18

17. If a crude oil train derails in the Chehalis Valley during a **major flood event** and oil spills, spreading quickly across the Chehalis Valley covering farmlands, riparian forests and wetlands, how will that oil be recovered? Are there plans for such a scenario? Are their mitigation measures that will be required to prevent this? Would farmers be compensated for the loss of productivity of their farmland due to high concentrations of Bakken Crude Oil in their fields? What economic loss would result from such a spill?

Response GP235-18

For information about the scenarios addressed in the risk assessment, refer to the Master Response for Environmental Health and Safety Analysis. Mitigation measures aimed at reducing risks during rail transport are proposed in Final EIS Chapter 4, Section 4.5. Refer to the Master Response for Mitigation Framework for more information about the approach to developing mitigation. Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of

associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP236, **Figlar-Barnes, Jarred**

Comment GP236-1

My name is Jarred Figlan-Barnes, and I live here in Elma. So I'd just like to quickly address something about the DEIS meeting location here before I go on.

It's miles from Elma, it's inconvenient, it's out of way. It's hard for people who are unfamiliar with the area to get to. People with disabilities, people who do not own a car because of low income who rely on mass transit may find this meeting almost impossible to attend.

Had a location in Elma, such as the high school or the fairgrounds been chosen, it would have been a lot more convenient.

Furthermore, as the Port of Grays Harbor directly benefits from these projects and owns Satsop Business Park, and as these meetings are supposed to be free of situational bias or geographical bias related to these projects, having the Port of Grays Harbor host this meeting is therefore a direct conflict of interest due to their own interest in having these projects go through since they'll be beneficiaries.

Response GP236-1

Comment acknowledged.

Comment GP236-2

Furthermore, in the DEIS, rail traffic noise impacts were addressed in detail for the city of Elma. However, increased rail traffic impacts on car and emergency vehicle (inaudible) to the north side of (inaudible) were not provided in detail. Rather an average wait time was derived along the segment of railroad from -- basically from Centralia all the way to Aberdeen. Elma was omitted from this part of the study. Elma has 11 rail crossings and with 900-plus people living on the north side of the tracks. I would ask that the EIS include a detailed study of the impacts the increased train traffic would have to the city of Elma specifically before it goes through.

Response GP236-2

Draft EIS Appendix L, *Vehicle Traffic Analysis*, illustrates the daily average and peak hour delay at all at-grade crossings on the PS&P rail line, including the crossings in Elma, for the analysis years (2017 and 2037).

Comment GP236-3

Furthermore, oil train explosions and fire mitigation, there are only two major mitigation measures shown for the potential derailment and explosion of a cruel oil train along the PSAP. First is an annual training day and second is a foam truck given to the City of Elma.

I would ask that the foam truck and both of those be removed as they do not mitigate an explosion if emergency responders cannot actually access the explosion or derailment because it's too dangerous.

Response GP236-3

Refer to the Master Response for Mitigation Framework.

GP237, **Figlar-Barnes, Kim**

Comment GP237-1

Co-lead Agencies: City of Hoquiam Washington State Department of Ecology November 21, 2015 The draft EIS is a horribly composed document and full of inaccuracies and lacks factual information. In particular, the last chapter of the document, Chapter 7 which includes the "Cost-Benefit Analysis" is extremely disconcerting. It is obvious the document has been composed to thoroughly benefit Westway Terminal Company LLC and Imperium Terminal Services proposed expansion to existing bulk liquid storage terminals. The City of Hoquiam and the Washington State Department of Ecology should be ashamed to be the co-lead agencies for the EIS. With that said, please review the attached comments for the DEIS for Westway Terminal Company LLC and Imperium Terminal Services proposed expansion to existing bulk liquid storage terminals located at the Port of Grays Harbor Terminal 1. Sincerely, Kim Figlar-Barnes

Response GP237-1

The commenter does not provide sufficient details to allow for a response.

Comment GP237-2

Chapter 3.1 Earth

Table 3.1.2 Probability of Stronger Earthquakes in Study Area

This information needs to be updated with figures from the *March 10, 2010 FEMA HAZUS-MH: Earthquake Event Report Canyon River Fault Grays Harbor County.*

Operations

Under this section of the report it states:

"Therefore, the development and implementation of the emergency evacuation plan described in Section 3.1.7.2, *Applicant Mitigation*, would help to reduce this impact."

So exactly where is section "**3.1.7.2**, Applicant Mitigation" located in the report for public review?

Response GP237-2

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies. The reference to Section 3.1.7.2 has been corrected to Section 3.1.7.1, *Applicant Mitigation*.

Comment GP237-3

Rail - Landslide and Slope Instability

Under this section of the report it states:

"For approximately 12 of the 19 miles (about 63%) that the rail line is adjacent to steep or unstable slopes, it is separated from the adjacent hillslope by US 12, a two-lane highway that is between 40 to 70 feet wide and often divided by a concrete barrier, as well as a vegetated median of varying width. Based on data obtained from WSDOT's Unstable Slopes Management Program, debris flows from the majority of the known unstable slopes upslope of the highway are not expected to impede more than half of the roadway width (Fish pers. comm.). Consequently, it is unlikely that landslide debris from these locations could reach the PS&P rail line."

This statement is false as the January 2015 storm event caused a severe landslide to cross Hwy 12 and the PS&P rail line east of Morrison Park closing both Hwy 12 and the rail line. Large amounts of landslide debris covered both areas. Why does the report not reflect that ***it is likely that landslide debris will reach the PS&P rail line as it occurred in the January 2015 storm?***

Response GP237-3

Based on the recent landslide occurrences that exceeded the predicted landslide flow distance, Final EIS Chapter 3, Section 3.1, *Earth*, acknowledges the distance that debris flow has traveled in the past. Despite the recent landslide events that exceeded the predicted landslide flow distances, the rail and road segments for 12 of the 19 miles described are estimated to have the same level of risk for interruption by landslides as previously described in the Draft EIS.

Comment GP237-4

3.1.7.1 Applicant Mitigation

Under this section of the report it states:

"The applicant will ensure that a tsunami evacuation and emergency management plan is prepared prior to beginning project operations. This plan will consider evacuation planning, identification of safe havens, and identification of evacuation routes to natural high ground and will be developed in coordination with emergency management officials (City of Hoquiam, Grays Harbor County, Washington State, U.S. Coast Guard, ship captains, and pilots)."

Where is the tsunami evacuation and emergency management plan? Why is this plan not included in the EIS for public review?

Under this section of the report it states:

"To reduce the potential for environmental damage related to a tsunami event, the applicant will

conduct a study to assess the technical feasibility and cost of implementing measures to construct

the proposed facilities to withstand a CSZ L1 tsunami wave based on the Scenario 2 inputs listed in Table 3 of the Tsunami Impact Modeling and Analysis (Appendix C). Agreed upon measures will be implemented prior to project design and construction in coordination with the co-lead agencies."

Where is the study to assess the technical feasibity and cost of implementing measures to construct the proposed facilities to withstand a CSZ L1 tsunami wave based on the Scenario 2 inputs listed in Table 3 of the Tsunami Impact Modeling and Analysis (Appendix C)? The study needs to be conducted and included in the EIS for public comment and review before the project is designed and constructed.

Response GP237-4

Development of the specified measures would be required if the proposed action is approved. Refer to the Master Response for Seismic Risk and Design Requirements for more information about the iterative, ongoing risk assessment and design processes commensurate with the project's stage in development.

Comment GP237-5

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

Under this section of the report it states:

"Although the likelihood of a large-scale tsunami event is low, such an event would likely cause

unavoidable and significant adverse environmental effects at or near the site if it occurred and the facility was not constructed to withstand it. The potential impacts in the event of a large scale

tsunami would include oil spills, fires, or explosions which are discussed in Chapter 4, *Environmental Health and Safety*."

According to the report *The Oregon Resilience Plan Reducing Risk and Improving Recovery for the Next Cascadia Earthquake and Tsunami, Report to the 77th Legislative Assembly from Oregon Seismic Safety policy Advisory Commission (OSSPAC) Salem, Oregon February 2013,* the likelihood of a large scale tsunami event is **high**, due to this fact alone the Westway and Imperium permits should be denied.

Response GP237-5

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP237-6

Chapter 3.2 Air

According to a report published by John Kemp through Reuters on August 3, 2015 the following was observed at tanks containing Bakken Crude oil for rail transport:

"The pipeline operator made the application just three days after the vapours in one crude tank at Berthold terminal in North Dakota were sampled and found to contain H2S at an extremely high concentration of 1200 parts per million, more than enough to be fatal."

"Exposure to hydrogen sulphide causes severe irritation and respiratory problems. It is immediately dangerous to life and health at concentrations above 100 parts per million (ppm), according to the federal government's Occupational Safety and Health Administration (OSHA)."

"Concentrations of as little as 50-200 ppm can cause shock, convulsions and coma. Inhaling H2S in excess of 1,000 ppm will cause immediate respiratory paralysis followed by death according to the Environmental Protection Agency (EPA) ("Report to Congress on Hydrogen Sulfide Air Emissions Associated with the Extraction of Oil and Gas" 1993)."

"Under OSHA regulations, workers must not be exposed to an average concentration more than 20 ppm over the course of an eight hour shift. Exposures of 20-50 ppm are permitted for no more than 10 minutes at a time. Workers must never be exposed to concentrations over 50 ppm."

So, how will the storage tanks at the terminals and the railway tank cars mitigate for storing and transporting Bakken Crude oil containing high concentrations of H2S at 1200 parts per million?

What mitigation measures will be taken at the terminal storage tanks to ensure the health and safety of individuals working around these tanks containing high concentrations of H2S at 1200 parts per million?

How will stationary railway tanks cars mitigate for venting the high concentrations of H2S at 1200 parts per million in communities throughout the transportation routes from North Dakota to the terminals in Grays Harbor?

Response GP237-6

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources.

As described in Draft EIS Chapter 3, Section 3.2, *Air*, based on air quality modeling for conducted by the applicant, emissions of toxic air pollutants related to routine operations of onsite stationary sources, including hydrogen sulfide, would be below the state thresholds identified in WAC 173-460-150. The Final EIS section reflects updated estimates based on a review of recently published Bakken crude oil data. These emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and applicant mitigation that would reduce potential impacts on air quality.

PS&P is required to adhere to all applicable regulatory requirements intended to ensure the safe passage of rail freight. Final EIS Chapter 4, Sections 4.4.3, 4.5.3, and 4.6.3 identify additional mitigation measures to reduce risk of an incident that could result in the release of crude oil.

Comment GP237-7

3.4 Plants

3.4.5.2 Proposed Action - Rail

Under this section of the report it states:

"An increase in leaks and spills of petrochemicals used in routine rail operations could occur due to the increased frequency of rail traffic and associated maintenance; the increase would be slightly higher compared to the no-action alternative. Diesel fuel, oils, grease, and other petrochemicals required for rail operation and maintenance could reach vegetation along the rail line through a small-scale spill or dripping from the train. These materials could either leak directly into vegetated areas along the rail bed or be carried short distances by precipitation or surface waters to more sensitive areas such as streams and wetlands through the openings on bridges and trestles. Impacts from a minor spill would be expected to be localized to the area of the spill adjacent to the rail line and would not be expected to spread across a wide area."

Why is it not reflected that such spills would spread across a wide area during any high water or flood event thus contaminating all vegetation that would come in contact with spilled oil?

Response GP237-7

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses the impacts associated with routine operations, including the potential for spills and leaks. As noted in Section 3.3, *Water*, the potential for impacts associated with such spills would most likely be minimized by containment features and best management practices. The potential for widespread environmental damage related to the risk of oil spills, fires, and explosions is addressed in Chapter 4, *Environmental Health and Safety*.

Comment GP237-8

3.5 Animals

3.5.3.2 Impact Analysis

Under this section of the report it states:

"The impact analysis for animals considered animals and habitats in the study area, specifically in and within 1 mile of the project site, within 0.5 mile on either side of the PS&P rail line, in and along the shoreline (0.5 mile inland) of Grays Harbor, and in the Pacific Ocean within 3 nautical miles of the entrance to Grays Harbor."

The Pacific Ocean currents will take spills farther than 3 nautical miles from entrance of Grays Harbor, the 1989 Nestuca Oil spill impacted Vancouver Island, BC. Since this is true; Why is the report not including all animal species likely to occur in the Pacific Ocean that is greater than 3 nautical miles of the entrance to Grays Harbor?

Response GP237-8

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively.

Comment GP237-9

3.5.4.3 Grays Harbor - Aquatic Habitats – Chinook
Under this section of the report it states:

"Spring-run adults are likely to pass through Grays Harbor in April on their return trip

to spawn in upper tributaries."

Spring-run adult Chinook pass through Grays Harbor in ***March***, see WDFW data 2015. Why is this information not included correctly in the report?

Response GP237-9

Final EIS Chapter 3, Section 3.5.4.3 *Grays Harbor*, *Aquatic Habitats*, *Fish*, reflects additional information to address the distinction between the presence of Chinook salmon and steelhead in Grays Harbor and the timing of river entry.

Comment GP237-10

3.5.4.3 Grays Harbor - Aquatic Habitats – Marine Mammals

Under this section of the report it states:

"Several ESA-listed whale species may occur off the Washington coast near Grays Harbor. These include blue, fin, and sei whales (*Balaenoptera musculus, B. physalus, and B. borealis*, respectively), sperm whale (*Physeter macrocephalus*), killer whale (*Orcinus orca*), and humpback whale (*Megaptera novaengliae*), all of which are federally listed and state-listed as endangered. Other whale species that may occur in the waters off Grays Harbor are the pygmy sperm (*Kogia breviceps*), common minke (*Balaenoptera acutorostrata*), and the state-listed sensitive gray whale (*Eschrichtius robustus*)."

Both the humpback whale (*Megaptera novaengliae*) and gray whale (*Eschrichtius robustus*) are frequently observed and known to **forage <u>with</u> in Grays Harbor**. Why is this information not included in the report?

Response GP237-10

Final EIS Chapter 3, Section 3.5, *Animals*, clarifies whale use of Grays Harbor, including frequent use by the gray whale, and provides additional information on gray whales, humpback whales, and killer whales.

Comment GP237-11

3.5.5.2 Proposed Action - Underwater Vessel Noise -

According to "Figure 3.5-1. Frequency Relationship between Marine Animals Sounds and Sounds from Shipping" Primary Shipping Noise ranges from 10 Hz to 1kHz which directly over laps with the hearing frequency range of baleen whales. How will underwater vessel noise be mitigated to protect baleen whales, specifically humpback whales (*Megaptera novaengliae*) and gray whales (*Eschrichtius robustus*) when they are foraging in Grays Harbor?

Response GP237-11

Draft EIS Chapter 3, Section 3.5, *Animals*, Figure 3.5-1, shows that primary shipping noise ranges between 10 Hertz and 1 kilohertz, a range that includes all vessel types. However, the Draft EIS also states that tankers exhibit noise frequencies at the lower end of this spectrum (40 Hertz), and tank barges would produce even less near-surface sound. Given that the context for the increase in vessel traffic related to the proposed action is an existing navigation channel currently used by large commercial vessels and that the proposed action would add fewer than one vessel trip per day on average, vessel traffic related to the proposed action is not expected to have a significant impact on humpback and gray whales.

Comment GP237-12

3.10 Recreation

3.10.4.3 Grays Harbor - Recreational Activities – Shellfishing

Under this section of the report it states:

"Razor clams are found primarily on the intertidal coastal beaches (those that are exposed at low tide) from a +3 foot tide level to a -2 foot tide level. The Washington Department of Fish and Wildlife manages two razor clam harvest areas near Grays Harbor.

- **Copalis Beach**. Harvests are managed from the north jetty at the mouth of Grays Harbor to the Copalis River.

- **Twin Harbors**. Harvests are managed from the Willapa Bay north to the south jetty at the mouth of Grays Harbor.

Razor clam seasons are variable and occur only after clam samples have been tested by Washington Department of Health and are found to be safe for human consumption (Washington Department of Fish and Wildlife 2015b)."

According to the Washington Department of Fish and Wildlife webpage the following is true regarding razor clam management:

"Razor clams are found primarily on the intertidal coastal beaches (those that are exposed at low tide) from a +3 foot level to a -2 foot tide level. The Washington Department of Fish and Wildlife (WDFW) divides the harvest areas into five major management zones (see map):

- **Long Beach** from the Columbia River north to the mouth of the Willapa Bay

- **Twin Harbors** from Willapa Bay north to the south jetty at the mouth of Grays Harbor

- **Copalis Beach** from the north jetty at the mouth of Grays Harbor to the Copalis River

- **Mocrocks** from the Copalis River to the south boundary of the Quinault Indian Reservation and

- **Kalaloch**] from the South Beach campground north to ONP Beach Trail 3. *(This beach is closed to harvest until further notice)*"

The Mocrocks and Kalaloch razor clam management areas need to be included in the EIS since they are located near Grays Harbor and many individuals who live in and near Grays Harbor are known to harvest razor clams in these areas.

The EIS also needs to include the fact that razor clam seasons **occur throughout the fall, winter and spring months** once the Washington Department of Health finds that clam samples are safe for human consumption.

Response GP237-12

Both the Mocrocks and Kalaloch razor clam management areas are outside of the study area for recreation analyzed in EIS Chapter 3, Section 3.10, *Recreation*. Final EIS Section 3.10.4.3, *Grays Harbor,* reflects revisions to indicate that razor clam seasons occur in the spring, fall, and winter.

Comment GP237-13

3.14 Hazardous Materials

3.14.5.2 Proposed Action-Operations-Diluted Bitumen

Why is "Diluted Bitumen" not listed as acutely toxic to all types of organisms?

Under this section of the report it states:

"Additionally, the applicant would be required to develop the required spill prevention, contingency, and response plans to reduce the potential for releases of crude oil and to clarify emergency notification and response protocols during site operations and vessel transfers. "

Where are the required spill prevention, contingency, and response plans so the public can review these documents?

Response GP237-13

It is the constituent chemicals of diluted bitumen that can be acutely toxic. Final EIS 4.7, *Impacts on Resources*, has been revised to more fully describe the potential impacts on human health. As noted in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, such plans are not required prior to operations and have not been developed. However, once the plans have been submitted to Ecology, such as the contingency plan required by WAC 173-186, they will be available for public review and comment for a period of 30 days. Refer to the Master Response for the Purpose and Focus of the EIS.

Comment GP237-14

3.15 Rail Traffic

3.15.4.2 PS&P Rail Line Track Conditions and Physical Characteristics- Federal Railroad Administration Class of Track and Speeds

Under this section of the report it states:

"The PS&P tracks are registered with the Federal Railroad Administration (FRA) as Class 2 tracks11 with an overall maximum speed of 25 mph for freight trains."

In light of the numerous crude by rail derailments that have occurred across the United States, the "Class 2 tracks11" are insufficient to tolerate such heavy freight loads due to transporting crude by rail. What mitigation measures will PS&P take to ensure their tracks will be able to tolerate the heavy freight loads associated with transporting crude by rail?

"Over Devonshire Bridge (Wynoochee River), the speed limit is 10 mph. Current maintenance

plans include repairing this bridge and increasing the speed limit to 25 mph."

What exactly are the maintenance plans for repairing this bridge that is nearly 100 years old and full of structural deficiencies, specifically gaping holes in the steel structural supports? Why is it not mandatory that this bridge should be replaced in order to transport crude by rail?

"Over the moveable bridges spanning the Wishkah and Hoquiam Rivers, the speed limit is 5 mph, in part because of the maintenance condition, but also because these are moveable bridges

(drawbridges). The rails must separate to open the bridge and align again when the bridge is

closed, which contributes to the speed limit of 5 mph."

Again, another bridge that is structurally deficient and nearly 100 years old which had a freight derailment on May 9th. Why is it not mandatory that this bridge should be replaced in order to transport crude by rail?

Response GP237-14

Refer to Response to Comment GP235-11.

Comment GP237-15

3.15.4.5 Ongoing Maintenance and Inspections- Future Maintenance Projects

Under this section of the report it states:

"Install 9,500 new hardwood ties at various locations on the west end of the Elma Subdivision."

It is a fact that concrete ties can handle heavier loads, are better support and last longer than wooden ties; why are concrete ties not being used to replace hardwood ties?

"Upgrade three steel bridges."

What and where are the three steel bridges that are to be upgraded?

Response GP237-15

As described in Draft EIS Section 3.15.4.5, *Ongoing Maintenance and Inspections*, PS&P has a capital improvement program, which includes a number of ongoing and periodic maintenance projects designed to maintain current capacity, safety, and operations. These planned projects address the normal wear and tear of a rail line, and will be needed as more trains (or more cars) transport commodities along the PS&P rail line. The actual scope of these projects may vary depending on future rail traffic volume and the needs of PS&P's rail customers and would be determined based on

applicable regulatory requirements. The projects listed are planned projects only and the scope of the projects may change.

Draft EIS Chapter 3, Section 3.15.4.5 also describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP237-16

3.15-10. Maximum Occupancy Time at Selected Grade Crossings—No-Action Alternative and Proposed Action

The proposed action times at Fleet Street 45 minutes and East Heron Street 52 minutes, is too long. The train would prevent any emergency vehicle from entering or exiting these areas. What is the plan to prevent this from happening?

Response GP237-16

Final EIS Chapter 3, Section 3.16.8, *Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety*? clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Comment GP237-17

3.16 Vehicle Traffic and Safety

3.16.5 What are the potential impacts on vehicle traffic and safety? No-Action Alternative-Emergency Vehicle Access

Under this section of the report it states:

"Additionally, as noted above, there are times (an average of four times per week) when all access into the Olympic Gateway Plaza is blocked for approximately 35 minutes."

An average of four times per week, where the Olympic Gateway Plaza is blocked for 35 minutes, that is too long. How will this be mitigated in order to save an individual's life during an emergency situation?

Response GP237-17

The text referenced in the comment describes impacts under the no-action alternative.

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Comment GP237-18

3.17 Vessel Traffic

3.17.4.2 Large Commercial Vessels-Large Commercial Vessel Operations-Escort Tug Services

Under this section of the report it states:

"The existing emergency response towing vessel at Neah Bay, located at the far northwest corner of Washington State, is available to assist vessels off the coast of Washington and in Puget Sound. It could assist with vessels in a difficult situation in or near Grays Harbor; however, under normal weather conditions, it could take an average of 12 hours to reach the harbor. Under adverse weather conditions, transit time to Grays Harbor could be as much as 18 hours."

Westway and Imperium are proposing to store and ship millions of gallons of crude oil out of Grays Harbor and the emergency response towing vessel is at Neah Bay! This is totally irresponsible and unacceptable, 12 to 18 hours for assistance or even longer depending upon adverse weather conditions which are a given every fall, winter and spring. How can this be justified when so much is at stake? This alone is gross negligence calling for the permits to be revoked. How and who will be responsible for staging an emergency response towing vessel in Grays Harbor? Who will be paying for this additional cost as it should be mandatory if crude oil is to be shipped from Grays Harbor?

Response GP237-18

Final EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels*, clarifies the emergency response capabilities of the tugs stationed at Grays Harbor.

Refer to Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*, for information about the closure of the Grays Bar Channel. The Captain of the Port has the authority to close the bar at Grays Harbor if the weather conditions are deemed too severe for vessels to transit. If the entrance to the port is closed due to weather conditions, the Port, the U.S. Coast Guard, and state-licensed pilots coordinate ship logistics until the Captain of the Port reopens the entrance.

Comment GP237-19

3.17.8 Would the proposed action have unavoidable significant adverse impacts on vessel traffic?

Under this section of the report it states:

"Under existing fishing conditions, increased vessel traffic would cause a disruption when

commercial fishers are in the navigation channel. This conflict is most likely to occur related to

harvest of salmon, steelhead, and sturgeon during the fall fishery. Although vessel operations related to the proposed action are reasonably certain, it is not possible to determine how the proposed action could affect a commercial fisher's daily catch because of other unpredictable factors (number of fishers, fish distribution, timing, and duration of fishing window on any given day of any given week). However, it is anticipated that because there are alternate fishing areas and because there would be additional days/windows to fish uninterrupted, impacts would not be significant."

"…it is not possible to determine how the proposed action could affect a commercial fisher's daily catch…"

This statement is a bogus and totally inaccurate. It is totally possible to determine how the proposed action could affect a commercial fisher's daily catch. Have the commercial fisher's been interviewed and asked: "How the proposed action could affect a commercial fisher's daily catch?" Has the commercial gillnetters association be contacted and asked this exact question? Have the commercial fish buyers been contacted and asked this exact question? All these groups would have an exact answer as it is their livelihood that is at stake and to make the assumption that "impacts would not be significant" shows a total lack of respect and how little research was done to acquire the correct answer.

Response GP237-19

Draft EIS Chapter 3, Section 3.17.4.3, *Fishing and Recreational Vessels*, describes commercial fishing in the study area. Section 3.17.5.2, *Proposed Action, Conflicts with Commercial Fishing*, describes potential conflicts with project vessels and commercial fishers. The statement quoted by the commenter does not reflect absence of information on fishing practices and catch; it reflects the uncertainty of specific circumstances. As stated, "Depending on the specific circumstances of each interaction (e.g., chance of a vessel calling during an open fishing window, distribution of the fish within the channel, number of fishers on any given day), it is difficult to predict whether increased occupancy at Terminal 1 would significantly affect any single fisher's daily catch."

Comment GP237-20

4.3 Risk Considerations

4.3.1.2 Crude Oil - Bakken Crude Oil & Diluted Bitumen

Under section "3.14 Hazardous Materials" the report states that Bakken Crude Oil is acutely toxic to all types of organisms and in this section of the report it states "In general, Bakken crude oil is moderately toxic." So which is it – acutely toxic or moderately toxic?

Under this section of the report it states:

"The responders for the Enbridge spill found that after the oil remained in the environment for a few hours or days, it sank because its composition changed (weathered).2 Oil that sinks below the surface of the water is harder to see and harder to recover."

According to the U.S. Coast Guard there is no effective or known method for cleaning up Diluted Bitumen oil that sinks. Why is this fact not represented in this report?

Response GP237-20

Final EIS Chapter 3, Section 3.14, *Hazardous Materials*, and Chapter 4, Section 4.3, *Risk Considerations*, have been revised for consistency. Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe the human health impacts. These revisions include clarification that the potentially toxic effects are more specifically related to the constituent components of crude oil rather than the crude oil itself.

Comment GP237-21

4.4 Environmental Health Risks—Terminal (Onsite)

4.4.1 What are the existing risks?

Under this section of the report it states:

"The **medium pipeline or storage tank spill scenario** could occur once in 2,500 years. This volume of spill could occur in the event of a pipeline rupture or a smaller storage tank failure. Depending on the event, it is possible that the existing containment areas would contain the majority of a spill of this size; however, if extensive infrastructure damage were to occur,

widespread environmental damage could occur."

If the above is true, then how can the "Potential Environmental Impact" under figure 4.4-1 be listed as ***LOW*** for the medium spill scenario? Why is it not ***SEVERE***? Please explain in detail.

Response GP237-21

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment GP237-22

4.5 Environmental Health Risks—Rail Transport

4.5.1 What are the existing risks? - Figure 4.5-1. Environmental Health Risks from Potential Spills during Rail Transport—No-Action Alternative

Under this section of the report it states:

For medium to large spills the figure under "likelihood of reaching water" should read likely not unlikely. The report states that the rail line crosses 107 waterways from Centralia to Hoquiam. The report neglects to point out that from Oakville to Hoquiam the rail line parallels the Chehalis River and the Chehalis River surge plain for 16 miles (See Table 4.5-1. Sensitive Habitats along the PS&P Rail Line). This is significant and therefore it would be ***likely*** that a medium or large spill will reach the water. In this same figure for medium to large spills "potential for environmental impact" would be low. Considering the facts listed above, the potential for environmental impact should be severe for medium to large spills. Figure 4.5.1 needs to reflect these facts!

Response GP237-22

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks. For the reasons discussed in this Master Response, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed in the Final EIS.

Comment GP237-23

4.5.2 What are the potential risks of the proposed action?

Under this section of the report it states:

"However, recent incidents in Lac-Mégantic, Québec; Casselton, North Dakota; Aliceville, Alabama; and Lynchburg, Virginia have been more significant."

Why does the report not list the reason for these recent incidents to be "more significant"? Each recent incident needs to be listed in detail as follows: the cause of derailment, amount of oil spilled, number of rail cars that exploded, loss of human life, damages to the surrounding environment and economic costs of the clean-up and who was responsible for those costs?

Response GP237-23

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns*, reflects additional information on the economic and social costs of oil spills. This includes information on derailments and other accidents involving trains carrying crude oil and information on a crude oil spill during marine transport.

Comment GP237-24

4.5.2.1 Oil Spills

Oil Spill Risk

Under this section of the report it states:

"There were four recent derailments on the PS&P rail line, all in April and May 2014. These

derailments did not involve oil spills.

- On April 29, two cars derailed at 5 mph at South Washington Street in Aberdeen due to wide gauge (track separation).

- On May 9, seven cars derailed at 6 mph at Heron Street in Aberdeen due to wide gauge.

- On May 15, 10 cars derailed at 10 mph near Montesano due to thermal track misalignment.

- On May 21, 11 cars derailed at 5 mph at Blakeslee Junction due to a combination of train makeup and track geometry design."

All of these listed derailments point to the PS&P rail line having rail tracks that are in disrepair and unable to handle the current cargo being transported. How will the PS&P rail line upgrade and repair current rail tracks in order to transport crude by rail without the risk of an oil spill or explosion?

Response GP237-24

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP237-25

Also in this section the report states:

"The likelihood of very large releases would remain low."

This is totally false, especially with the state of the PS&P rail line tracks. Until the PS&P rail line upgrades the rail tracks and decaying bridges to support the transportation of crude oil this statement should read: "The likelihood of very large releases would remain ***high***."

Response GP237-25

Refer to the Master Response for Risk Assessment Methods for information about the data, methods, and approach used in the risk analysis.

Comment GP237-26

Oil Spill Prevention

Under this section of the report it states:

"As discussed in Section 4.2, *Applicable Regulations*, railroad operators that transport oil and hazardous materials are required to meet federal and state standards for

locomotives and rail cars. They must also develop contingency and response plans to prevent spills from reaching the environment."

Where are contingency and response plans to prevent spills from reaching the environment? These plans need to be included in the EIS for public review.

Response GP237-26

Contingency plans would not be required until the proposed action has been approved. Once they are available, the will be circulated for public review and comment.

Comment GP237-27

Oil Spill Prevention

Under this section of the report it states:

"As described in Section 4.2.1.2, *Rail*, PHMSA has issued a final rule that defines and regulates highhazard flammable trains (49 Code of Federal Regulations [CFR] 171?180). The proposed requirements would improve the safety of crude oil and ethanol shipments by rail (80 FR 26643)."

Since this rule has been in effect crude oil trains are still derailing and exploding. How will the rail lines transporting crude oil go above and beyond this rule to ensure that crude oil trains will no longer explode when derailed?

Response GP237-27

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* discloses voluntary measures and design features, applicant mitigation, and other measures that would further reduce environmental health and safety impacts from rail transport related to the proposed action, in addition to regulatory compliance and best practices. To the extent possible, within the framework outlined in the Master Response for Mitigation Framework, measures addressing the need for more coordinated and focused planning include the role of the applicant as appropriate. However, as noted, no risks can be completely eliminated. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Comment GP237-28

Under this section of the report it states:

"Reduce operating speeds to no more than 40 mph. The PS&P rail line is already limited to 25 mph as Class II track and there are slower speed limits in areas."

The Aliceville, Alabama train was traveling 20 mph when it derailed, exploded and spilled 750, 000 gallons of crude oil into surrounding wetlands. How will the PS&P rail line mitigate to prevent such an event from occurring?

"Require new and existing tank cars to meet specific design requirements or performance

criteria (e.g., thermal, top fittings, and bottom outlet protection; tank head and shell puncture resistance)."

New and existing tanks cars required to meet specific design requirements for performance criteria have already been involved in train derailments and have failed to prevent oil spills and oil explosions. The tank cars cannot be made crashworthy. Non-yard oil train **derailment spills** are guaranteed to happen in the extended area several times per decade. An oil spill would have significant and adverse impacts that cannot be prevented or mitigated. At best only 14% of the oil is recovered in a spill. Crude oil contains benzene which cannot be recovered from the water. How will the PS&P rail line mitigate to prevent these events from occurring?

Response GP237-28

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* discloses voluntary measures and design features, applicant mitigation, and other measures that would further reduce environmental health and safety impacts from rail transport related to the proposed action, in addition to regulatory compliance and best practices. To the extent possible, within the framework

outlined in the Master Response for Mitigation Framework, measures addressing the need for more coordinated and focused planning include the role of the applicant as appropriate. However, as noted, no risks can be completely eliminated and, depending on the circumstances, significant impacts could occur.

Comment GP237-29

Oil Spill Response – Railroad

Under this section of the report it states:

"Implement emergency response plan required under federal law. This includes notifications and

initial actions for incidents."

Where is the emergency response plan so it can be reviewed for public comment in the EIS?

Response GP237-29

Evaluation of the emergency response plan is outside the scope of the EIS. Refer to Purpose and Focus of the EIS.

Comment GP237-30

Geographic Response

Under this section of the report it states:

"For example, the Grays Harbor GRP contains 16 response strategies relevant to an oil spill that affects the Chehalis River (this number does not include response strategies related to tributaries or wetlands that connect to the river)."

According to this report, the rail line crosses 107 waterways from Centralia to Hoquiam. So what exactly will be the response strategies related to tributaries or wetlands that connect to the river? This information needs to be available for public comment in the EIS.

Response GP237-30

As discussed in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, the response framework would consider the specific conditions at the time of an incident to inform the best procedure for containing and responding to an oil spill.

Comment GP237-31

Under this section of the report it states:

"In addition to the site-specific information in the GRPs, there is relevant information in other

sections of the larger Northwest Area Contingency Plan that supplements the site-specific strategies. For example, Chapter 3000 – Operations, contains a section titled Operational Safety Issues Associated with Bakken Crude Oil and another section titled Fast Water Oil Spill Response, which would inform local responders in the event of a rail incident. Section 9302 of the Northwest Area

Contingency Plan is entirely dedicated to responder decision tools for oil spill response in fast water currents."

Why are these plans not included in the Appendices of this report for public review and reference?

Where are the exact methods for "oil spill response in fast water currents"? This information needs to be included in the EIS for public review.

Response GP237-31

Although the Northwest Area Contingency Plan (NWACP) contains information that would inform emergency preparedness and response planning in the event of an incident associated with the proposed action, review of and comment on the NWACP is not within the scope of the EIS. As noted in Draft EIS Chapter 3, Section 3.0, *Introduction*, the Draft EIS considers the effectiveness of existing regulations, plans, and available resources, including the NWACP, in the analysis of impacts. As discussed in Section 4.2, *Applicable Regulations*, the response framework would consider the specific conditions at the time of an incident to inform the best procedure for containing and responding to an oil spill.

Comment GP237-32

4.5.2.2 Fires or Explosions

Fire or Explosion Risk

Under this section of the report it states:

"While there have been multiple recent derailments of trains on main lines that resulted in fires or explosions, the chance of an extreme derailment is very limited in the study area because of the slow speeds on the PS&P rail line, which are slower than typical mainline speeds."

The Aliceville, Alabama spill was 20 mph and the spill was extreme. The Mount Carbon WV spill was very extreme! Extreme spills happen at slower speeds!

According to the April 16, 2015 article; *Rail defect, tank car valves implicated in West Virginia oil train fire (http://www.mcclatchydc.com/news/nation-world/national/economy/article24783187.html#storylink=cpy)* the following facts are true:

1. Outlet valves underneath four tank cars in a February oil train derailment in West Virginia were sheared off and the 50,000 gallons of crude oil they released ignited in a fire (According to Wikipedia *All of the cars were DOT-111 tank cars meeting the Casualty Prevention Circular (CPC)-1232 industry standard*).

2. 362,000 gallons of crude oil were released. The fires and explosions from the derailment kept 300 residents away from their homes.

3. Federal regulations require tank cars to survive 100 minutes of fire exposure. However, eight tank cars failed within 90 minutes after the derailment, their contents exploding in giant fireballs, according to the NTSB.

How will PS&P rail lines mitigate to prevent the scenarios listed above? Will the PS&P rail lines guarantee that all the tank cars will have thermal jackets and high capacity pressure relief valves to prevent tank cars sitting in a pool fire from exploding? Please be specific with the response.

Response GP237-32

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* discloses voluntary measures and design features, applicant mitigation, and other measures that would further reduce environmental health and safety impacts from rail transport related to the proposed action, in addition to regulatory compliance and best practices. To the extent possible, within the framework outlined in the Master Response for Mitigation Framework, measures addressing the need for more coordinated and focused planning include the role of the applicant as appropriate. However, as noted, no risks can be completely eliminated and, depending on the circumstances, significant impacts could occur.

Comment GP237-33

Explosion Prevention- Explosion Response

Under this section of the report it states:

"PHMSA provides guidance for a fire or explosion from a train carrying crude oil (Pipeline and Hazardous Materials Safety Administration 2014), which states that, "in the event of an incident that may involve the release of thousands of gallons of product and ignition of tank cars of crude oil in a unit train, most emergency response organizations will not have the available resources, capabilities, or trained personnel to safely and effectively extinguish a fire or contain a spill of this magnitude (e.g., sufficient firefighting foam concentrate, appliances, equipment, water supplies). Response to unit train derailments of crude oil will require specialized outside resources that may not arrive at the scene for hours; therefore it is critical that responders coordinate their activities with the involved railroad and initiate requests for specialized resources as soon as possible.""

This is absurd beyond absurdity! There are no effective means to extinguish a fire or contain a spill of this magnitude. To date no crude by rail derailment consisting of explosions has been successfully fought or put out with "foam concentrate, appliances, equipment, water supplies". It is totally absurd to even include such comments in this report. The only effective means to fight a crude by rail train derailment explosion is to **LET IT BURN OUT**! The oil vapor pressure cannot be lowered enough to prevent ignition. When tank cars are punctured during a derailment, gases rush out and find a spark. Non-yard derailment spills usually lead to fire. Oil train fires are likely to cause **burns, deaths**, and property damage. Burns, deaths, and property damage are significant adverse impacts that cannot be prevented or mitigated. This fact needs to be included in the EIS for public review and comment.

Response GP237-33

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*, presents the analysis of risk of oil spills, fires, and explosions during rail transport related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident along the PS&P rail line. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including those raised in the comment. The Final EIS section acknowledges that injury and death are potential impacts of a fire or explosion.

Comment GP237-34

4.**5.3 What mitigation measures would reduce impacts related to rail transport?**

4.5.3.1 Voluntary Measures and Design Features

Why are the measures listed in this section of the report voluntary? These measures should be mandatory!

Response GP237-34

Voluntary measures and design features are measures not otherwise required by law, which the applicant has committed to and which are considered to be elements of the proposed action. Refer to the Master Response for Mitigation Framework.

Comment GP237-35

4.5.3.2 Applicant Mitigation

Under this section of the report it states:

"The applicant will implement the following mitigation.

- To improve preparedness for incidents, including oils spills, explosions, and fires, the applicant will ensure an emergency preparedness workshop is conducted prior to beginning project operations. The applicant will coordinate the workshop with Ecology. The workshop will be no more than 1 day in length and be held prior to beginning operations and annually thereafter. The initial workshop will focus on familiarizing local emergency responders, tribes, and communities with the contents of the Northwest Area Contingency Plan, the Grays Harbor and Chehalis Geographic Response Plans, other local response plans, the facility response plan, and the measures that are in place for a rapid and effective spill response."

The workshop will be no more than 1 day in length! Are you serious? Can this report get any more absurd? Why is this workshop no more than 1 day in length? Does one honestly believe that the contents of "the Northwest Area Contingency Plan, the Grays Harbor and Chehalis Geographic Response Plans, other local response plans, the facility response plan, and the measures that are in place for a rapid and effective spill response" can be covered in no more than 1 day in length? This is totally unrealistic and needs to be appropriately addressed in the EIS.

Response GP237-35

Comment acknowledged.

Comment GP237-36

Under this section of the report it states:

"Due to sensitivity of the local environment, tribal resource concerns, and the potential presence of special-status species, to improve coordination and response capabilities in the event of a rail accident, the applicant will not accept crude oil by rail unless PS&P prepares, submits to Ecology for approval, and implements a contingency plan…"

Where are the contingency plan? These plans need to be completed and made available for public review and comment in the EIS.

Response GP237-36

As noted in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, an oil spill contingency plan is not required prior to operations and has not been developed. However, once a plan has been submitted to Ecology as required by WAC 173-186, it will be available for public review and comment for a period of 30 days. Refer to the Master Response for the Purpose and Focus of the EIS.

Comment GP237-37

Under this section of the report it states:
"To improve response capability for trains transporting product to the project site, the applicant will not accept crude oil until a foam truck has been provided to the Elma Fire Department to provide fire-fighting capability along the PS&P rail line. The foam truck must be available and operational prior to beginning operations. The applicant will consult with Ecology and the local fire department to determine the capacity of the foam truck."

Is this seriously being considered? To date a foam truck has not been effective in fighting a crude by rail train derailment and explosion. Why is this even being considered? If it is being considered, who will be purchasing the foam truck? Will taxpayer dollars be used to purchase the foam truck? All of these questions need to be addressed in the EIS for public review and comment.

Response GP237-37

Final EIS Chapter 4, Section 4.5.3.2, *Applicant Mitigation*, clarifies the proposed measure to support the Elma Fire Department's response capabilities. The measure is the responsibility of the applicant.

Comment GP237-38

4.5.5 Who would pay for the response and cleanup of a rail transport spill?

Under this section of the report it states:

"The liability for rail transport spills is the same as described for onsite spills (Section 4.4.5) when there is the potential for waters of the United States to be affected. The polluter pays for costs and damages associated with oil spills. Response and cleanup of spills from rail cars that threaten the navigable waters or adjoining shorelines are the responsibility of the owner or operator (also referred to as the shipper) of the rail cars carrying the crude oil (RCW 88.40, Transport of Petroleum Products—Financial Responsibility). The federal government has established high limits on that liability. Washington State places no limits on liability of polluters to third parties, allowing recovery of cleanup costs and natural resource damages beyond the federal limit. To cover removal costs above the federal limits of liability, the U.S. Congress established a 1-billion-dollar Oil Spill Liability Trust Fund to pay for expeditious oil removal and uncompensated damages."

Who will pay when the "shipper" claims bankruptcy as did the "shipper" for the Lac-Mégantic, Québec crude by rail derailment disaster with costs currently approaching 2 billion dollars?

Response GP237-38

Draft EIS Chapter 4, Section 4.5.5, *Who would pay for the response and cleanup of a rail transport spill?* addresses the liability for rail transport spills. Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Comment GP237-39

Who will pay when the costs exceed the U.S. Congress established a 1-billion-dollar Oil Spill Liability Trust Fund?

Response GP237-39

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law.

Comment GP237-40

Will it be mandatory for the "shipper" to obtain the best available insurance policies to cover a worst case scenario of a crude oil disaster by rail?

Response GP237-40

The Oil Transportation Safety Act (House Bill 1449, Section 10) added a new section to RCW Chapter 81.04 (81.04.560) that requires railroad companies that transport crude oil in Washington to submit information relating to the railroad company's ability to pay damages in the event of a spill or accident involving the transport of crude oil in Washington. The Washington Utilities and Transportation Commission is administering this requirement and recently approved regulations (TR-151079, effective March 11, 2016) that require rail operators transporting crude oil in Washington to state in a required annual report that they carry sufficient insurance to cover any losses resulting from a reasonable worst-case spill. Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Comment GP237-41

4.6 Environmental Health Risks—Vessel Transport

Oil Spill Prevention

Under this section of the report it states:

"Vessel operators are required to develop and implement safety and contingency plans to ensure that appropriate protocols, equipment, and training are in place to reduce the chances and extent of damage related to spills."

Where are the safety and contingency plans to ensure the appropriate protocols, equipment, and training are in place to reduce the chances and extent of damage related to spills? These plans need to be available for public review and comment in the EIS.

Response GP237-41

Although individual vessel operator contingency plans contain information that would inform emergency preparedness and response planning in the event of an incident associated with the proposed action, review of and comment on these plans is not within the scope of the EIS. As noted in Draft EIS Chapter 3, Section 3.0, *Introduction*, the Draft EIS does consider the effectiveness of existing regulations, plans, and available resources, which includes an understanding of the basic requirements of a vessel contingency plan, in the analysis of impacts. And as discussed in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, the response framework would consider the conditions at the time of an incident to inform the best procedure for containing and responding to an oil spill.

Comment GP237-42

Oil Spill Response- Geographic Response

Under this section of the report it states:

"The GRPs describe response strategies such as placing boom to close off access of spilled oil into environmentally sensitive sites (such as Grass Creek in North Bay or Newskah Creek just to the south of Rennie Island)."

Booming is a useless oil spill response strategy in Grays Harbor, especially during the fall, winter and spring months when storms are persistent. These storms are accompanied by high winds and fast flowing/flooding currents. What other oil spill response strategy will be used instead of booming to protect environmentally sensitive sites when winds are creating waves and currents are flooding?

Response GP237-42

Final EIS Chapter 4, Section 4.4, *Environmental Health Risks—Terminal (Onsite*), includes proposed applicant mitigation measures to assess the feasibility of response strategies in the study area, including rail and vessel transport, options for prevention and response strategies other than booming. If the underlying permit application is approved, these measures can be required to inform strategies that would be required in the applicant's contingency plan and related operational approvals. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion.

Comment GP237-43

Under this section of the report it states:

"In some cases, economic considerations may dictate response priorities (for example preventing oil from affecting shellfish harvest areas or a marina)."

Preventing oil from affecting shellfish harvest areas. The exact methods, time of response, and allocation of resources needs to be explained in full detail on how this will occur? Every shellfish

grower/harvester in Grays Harbor and along the WA coastal beaches has a right to know: "How this will be done?!"

Response GP237-43

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Section The geographic response plans, as referenced in Final EIS Chapter 4, Section 4.2, *Applicable Regulations*, supplement the Northwest Area Contingency Plan and provide additional information on sensitive resources that could be affected by a spill at specific locations in the study area. The plans also identify appropriate response strategies for different spill scenarios. These plans are publicly available as follows:

- The Northwest Area Contingency Plan: http://www.rrt10nwac.com/Files/NWACP/2016/Northwest%20Area%20Contingency%20Plan%202016.pdf
- The Chehalis River Geographic Response Plan: http://www.ecy.wa.gov/programs/spills/preparedness/GRP/ChehalisRiver/ChehalisRiverGRP.pdf
- The Grays Harbor Geographic Response Plan: http://www.ecy.wa.gov/programs/spills/preparedness/GRP/GraysHarbor/GraysHarbor-AllChapters.pdf

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP237-44

4.6.2.2 Fires or Explosions

Explosion Prevention

Under this section of the report it states:

"Ecology also conducts vessel inspections. Vessel classification societies also regularly survey vessels to ensure compliance."

How often does Ecology conduct vessel inspections? How often do vessel classification societies survey vessels to ensure compliance? This information needs to be included in the EIS for public review and comment.

Response GP237-44

Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, describes the applicable regulatory requirements and framework related to vessel transportation. The inspection requirements for all tank vessels are provided in 33 CFR D (Part 30-40). As required by 46 USC 3714, each foreign tank vessel must undergo a Certificate of Compliance Exam conducted by the U.S. Coast Guard at its initial U.S. port of call and at least annually thereafter. U.S. tank vessels are also boarded annually to maintain a current Certificate of Inspection and to ensure other international and domestic

requirements are being met (e.g., pollution prevention, lifesaving, navigation equipment). Additional design, equipment, and operations requirements relating to pollution prevention for vessels that carry oil are provided in 33 CFR O, 151–157). Vessel classification society boardings are carried out independently or in conjunction with the U.S. Coast Guard boarding depending upon the situation. Washington State Department of Ecology inspects vessels and observes oil transfer operations in accordance with 90.56 RCW and 88.46.167 RCW, respectively. The following link provides information on the requirements for tank vessels operating in Washington State waters:

http://www.ecy.wa.gov/programs/spills/prevention/vesseltechassist/tankvessels.html.

Comment GP237-45

Under this section of the report it states:

"A venting system that prevents tanks from being over-pressurized while they are being loaded or if the product expands while being transported. Vapors are released high above the deck at the end of vent risers, away from potential ignition sources."

What measures are in place to protect the safety of people working or living in the vicinity of the toxic vapors being released into the environment?

Response GP237-45

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources.

As described in Draft EIS Chapter 3, Section 3.2, *Air*, based on air quality modeling for conducted by the applicant, onsite emissions of toxic air pollutants related to routine operations of onsite stationary sources would be below the state thresholds identified in WAC 173-460-150. The Final EIS section reflects updated estimates based on a review of recently published Bakken crude oil data. These emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and applicant mitigation that would reduce potential impacts on air quality.

Comment GP237-46

4.6.3.1 Applicant Mitigation

Under this section of the report it states:

"To reduce the risk of a fire or explosion from tank barges, the applicant will not receive or supply Bakken crude oil to tank barges unless the tank barges are able to inert their tanks when carrying Bakken crude oil."

What product will be used to "inert their tanks"? How much will this reduce the risk of a fire or explosion?

Response GP237-46

Draft EIS Chapter 4, Section 4.6.2.2, *Fires or Explosions*, discusses the use of an inert gas system to reduce the threat of a fire or explosion on tank vessels and barges. Controlling ignition sources also helps reduce the chance of igniting any vapors. As noted in Master Response for Environmental Health and Safety Analysis, the risk assessment considers the risks of various release scenarios regardless of causal event to provide information to characterize the risk profile and better target the need for potential mitigation.

Comment GP237-47

Under this section of the report it states:

"To improve response times and communication in the event of an incident that could affect commercial or recreational fishing, the applicant will develop a method for provide information on potential incidents to commercial and recreational fishing boats and will describe this measure in the oil spill contingency plan prior to beginning operations."

Where is the oil spill contingency plan? The plan needs to be included in the EIS for public review and comment.

Response GP237-47

As noted in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, an oil spill contingency plan is not required prior to operations and has not been developed. However, once a plan has been submitted to Ecology as required by WAC 173-186, it will be available for public review and comment for a period of 30 days.

Comment GP237-48

4.6.3.2 Other Measures to Be Considered

Why is an emergency response tug stationed at Grays Harbor not listed in this section? Why is this not mandatory?

Response GP237-48

Final EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels*, clarifies the emergency response capabilities of the tugs stationed at Grays Harbor.

Comment GP237-49

4.6.4 Would the proposed action result in unavoidable and significant adverse environmental impacts related to vessel transport?

Under this section of the report it states:

"However, no mitigation measures would completely eliminate the possibility of a large spill or explosion, nor would they completely eliminate the adverse consequences of a large spill or explosion."

This statement alone sums up the insanity of the proposed Westway and Imperium oil terminals. Please explain what the full costs would be to the local economy and environment if a large spill or explosion were to occur?

Response GP237-49

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP237-50

4.7 Impacts on Resources

Groundwater

Under this section of the report it states:

"In the study area, the highest risk of groundwater contamination from spilled crude oil would be along the PS&P rail line, which runs through several areas underlain by largely unconfined surficial1 aquifers. These aquifers are known to interact with surficial water features (e.g., rivers, streams), generally receiving discharge from these features during the winter when river stages are high and discharging to rivers and stream during the summer when river stages are low (Gendaszek 2011:10)."

Exactly how will these groundwater areas be protected from an oil spill or explosion? Please list the exact details and costs of implementing such protective mitigation measures.

Response GP237-50

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. The potential impacts are described in general terms in Final EIS Section 4.7, *Impacts on Resources*, including the potential impacts on groundwater. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2, has been updated to provide additional information about economic and social costs of oil spills.

Comment GP237-51

Under this section of the report it states:

"The greatest potential for the most extensive environmental exposure would involve a large spill directly to surface waters because the oil could be transported to a much wider geographic area. For these reasons, the subsequent discussion focuses on the potential for impacts on plants for a larger-scale release within Grays Harbor or the Chehalis River.

If a plant comes into direct contact with crude oil, constituent compounds (e.g., polycyclic aromatic hydrocarbons) can cause acute toxicity, resulting in tissue necrosis and loss of photosynthetic ability.

Depending on the amount of a plant's surface that is coated, crude oils and heavy refined oils can destroy plant tissues through direct toxicity and can reduce photosynthesis, oxygen transfer to the roots, and respiration to the point where the aboveground portion of the plant dies. Regrowth from below ground roots and rhizomes is possible within one to two growing seasons, although 3 to 5 years is a typical recovery period for salt marshes such as are present along the shores of Grays Harbor and the lower Chehalis River (International Tanker Owners Pollution Federation Limited 2011a:4; Michel and Rutherford 2013:2-21)."

It is bad enough native plants would be destroyed, but there is no mention of agricultural crops. If an oil spill occurs along the rail line when the Chehalis River is flooding as it is today (11-18-15) as I write these comments farmers would lose crops for market and feed for animals. Who will cover farmers loses for 3-5 years or longer?

Response GP237-51

Final EIS Section 4.7, *Impacts on Resources*, clarifies that while impacts would depend on the circumstances of the incident, the resources described in Chapter 3 could be affected. This section has been revised to more specifically refer to the potential for impacts of a crude oil spill on crop land. Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Comment GP237-52

Under this section of the report it states:

"Dispersed oil in the water column can also affect floating plants (phytoplankton), nonfloating kelp, and primary consumers (zooplankton) typically through direct toxicity. This affects, at least temporarily, the base of the estuarine and marine food web, which, depending on the extent (in size and duration) of the damage, can result in broader ecological damage."

Why does the statement end with "can result in broader ecological damage"? The true statement should read "can result in a complete ecological collapse in areas of oil contamination". The amount of "downplaying" the consequences of an oil spill throughout this report is shameful and totally unprofessional.

Response GP237-52

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts that could be expected if an incident were to occur and acknowledges resources that could be adversely affected. The potential impacts from a spill would vary based on the material spilled, weather, tides,

location, and other factors. The reference to broader ecological damage is inclusive of extensive damage.

Comment GP237-53

Under this section of the report it states:

"Once oil enters these small pores, it can be very difficult to access and clean up contaminated areas. Heavier and more viscous oils, such as bitumen, may be more likely to remain trapped in pore spaces and thus be more difficult to remove (International Tanker Owners Pollution Federation Limited 2011a:6). High viscosity oils can also form "asphalt pavements"—the oil oxidizes in small pore spaces into hard pavement that can persist for decades (International Tanker Owners Pollution Federation Limited 2011b:7)."

Since oil can still be found just a few inches below the surface of the shoreline from the Exxon Valdez spill that occurred in 1989; what exactly will the mitigation plans be to prevent and clean-up contaminated areas that fall under the above classification?

Sensitive Areas in the Study Area-Grays Harbor Shoreline, Chehalis River Surge Plain Natural Area and Grays Harbor National Wildlife Refuge (Bowerman Basin)

Response GP237-53

Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, includes a discussion of the existing regulatory framework in place to respond to and cleanup an oil spill. Refer to the Master Response for Liability and Responsibility for Incidents.

Comment GP237-54

Under this section of the report it states:

"However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill."

Another callous statement that sums up the insanity of the proposed Westway and Imperium oil terminals. So does that mean the *Sensitive Areas in the Study Area-Grays Harbor Shoreline, Chehalis River Surge Plain Natural Area and Grays Harbor National Wildlife Refuge (Bowerman Basin)* are expendable? What would the exact economic and environmental costs be if a large spill would destroy these Sensitive Areas?

Response GP237-54

Refer to Response to Comment GP237-50.

Comment GP237-55

4.7.1.3 Animals- Impacts from Oil at the Water Surface

Under this section of the report it states:

"Federally protected species such as killer whales, humpback whales, and sea turtles such as leatherback and green sea turtles might visit Grays Harbor (although rarely) and can be seasonally present in adjacent Pacific coast waters."

Why does this statement list humpback whales visiting Grays Harbor as rare? This is totally false and needs to be corrected! Humpback whales are regular visitors to Grays Harbor and have been observed feeding in the harbor on multiple occasions this summer and in years past.

Response GP237-55

Final EIS Chapter 3, Section 3.5, *Animals,* and Chapter 4, Section 4.7.1.3, *Animals*, clarify whale use of the study area. Additional information on humpback whales and killer whales has also been added to Section 3.5.

Comment GP237-56

Impacts from Oil in the Water Column

Under this section of the report it states:

"These responses include developmental abnormalities in larval and adult fish, cardiovascular defects in embryonic fish, and delayed hatching and smaller size at hatching of juveniles (Michel and Rutherford 2013:2?18)."

Why does this report not include the latest findings from the report *Very Low Embryonic Crude Oil Exposures Cause Lasting Cardiac Defects in Salmon and Herring*? Since salmon and herring populations are vital to Grays Harbor and the coastal waters the most relevant and significant studies involving crude oil exposures to such populations must be included in this report.

Response GP237-56

There are many studies on the potential impacts of oil (and its components) on many species and specific physiological functions. Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, covers subacute and acute impacts, and the worst-case scenario of death for aquatic organisms, including fish. These impacts are well documented in literature, and as required under SEPA regulations (WAC 197-11-440 (6)(c)(v)), impacts are summarized in the Draft EIS.

Comment GP237-57

Impacts from Oil along Shoreline and Intertidal Habitats

Under this section of the report it states:

"Common benthic invertebrates in Grays Harbor marshes and intertidal mudflats include variousspecies of clams and snails, as well as intertidal crabs (e.g., red rock crabs and Dungeness crabs), which burrow in the substrates of these habitats. Oil that sinks and binds with sediments in these habitats can become trapped, resulting in smothering or toxic effects in benthic invertebrates."

Why does the report neglect to state the smothering or toxic effects in the microbenthic invertebrates, major food web organisms of the marine environment?

Response GP237-57

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources,* addresses the potential oil impacts on plankton, phytoplankton, and zooplankton, which are major food web organisms that include microscopic plants and animals (including microinvertebrates in the benthic zone).

Comment GP237-58

Terrestrial Animals

Under this section of the report it states:

"Oil spills in the vegetated terrestrial environment could occur during rail transport and could affect terrestrial animals and their habitats."

Why is livestock not included under "terrestrial animals"?

Response GP237-58

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Final EIS Section 4.7 acknowledges agricultural uses along the rail line.

Comment GP237-59

Sensitive Areas in the Study Area

Under this section of the report it states:

"The U.S. Fish and Wildlife Service designated critical habitat in several areas along the PS&P rail line for the federally listed bull trout (fish) and marbled murrelet (bird), and has proposed critical habitat for the Oregon spotted frog."

Why is the Pacific Ocean not included as designated critical habitat for the marbled murrelet considering it lives and forages along the Washington coast? This fact needs to be included in the EIS.

Response GP237-59

Critical habitat is a specific habitat designation under federal regulations and the critical habitat designation applies to specific areas identified in the regulations. The U.S. Fish and Wildlife Service has not designated marbled murrelet critical habitat in the Pacific Ocean.

Comment GP237-60

Under this section of the report it states:

"The applicant has committed to cease all vessel-loading operations for a 2-week period each year during the Grays Harbor Shorebird Festival."

This is such an absurd statement it is laughable. Why does the applicant not recognize that any oil spill at any time of the year would jeopardize all living organisms?

Response GP237-60

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to completely eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Comment GP237-61

4.7.1.4 Aesthetics

Under this section of the report there is no mention on how private property would be effected by oil spills?

Response GP237-61

The approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms, which includes aesthetic impacts on surrounding land uses regardless of specific land ownership.

Comment GP237-62

4.7.1.5 Recreation

Under this section of the report it states:

"However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill."

This statement seems to be a rather common phrase throughout this report. It is so insensitive and has a total disregard for the recreational value of Grays Harbor and the people who live in this community. How can the proposed Westway and Imperium oil terminals even be considered given the above statement?

Response GP237-62

The statement referred to in the comment is intended to acknowledge the potential for unavoidable significant impacts in a consistent manner for all resource areas that could occur as the result of the proposed action. As noted previously, the approach to the risk assessment is to evaluate the risks of select spill scenarios and therefore, does not identify the impacts that could affect specific resource areas. However, Chapter 4, Section 4.7, *Impacts on Resources,* does address the types of impacts that could occur, including the impacts on recreational resources within Grays Harbor, in general terms.

Comment GP237-63

4.7.1.8 Human Health

Under this section of the report it states:

"A potential health risk is posed from the inhalation of high concentrations of hydrogen sulfide released into the air from an oil spill."

Why is there no mention of the inhalation of high concentrations of hydrongen sulfide and other toxic gases that will be released from venting rail cars, tanks and vessels?

Response GP237-63

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources.

As described in Draft EIS Chapter 3, Section 3.2, *Air*, based on air quality modeling for conducted by the applicant, onsite emissions of toxic air pollutants related to routine operations of onsite stationary sources, including hydrogen sulfide, would be below the state thresholds identified in WAC 173-460-150. The Final EIS section reflects updated estimates based on a review of recently published Bakken crude oil data. These emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and applicant mitigation that would reduce potential impacts on air quality.

Rail and vessel operators are required to adhere to all applicable regulatory requirements intended to ensure the safe passage of freight.

Comment GP237-64

4.7.2.1 Recent Fires and Explosions Involving Crude Oil Trains

Since the report lists all of the recent fires and explosions involving crude oil trains, then how can the report make the following statements?

"The **large (five-car) rail transport spill scenario** could occur once in 4,800 years with current rail cars; with rail car improvements, this would extend to once in 11,000 years."

"The **large (30-car) rail transport spill scenario** could occur once in 10,000 years with current rail cars; with rail car improvements, this would extend to once in 74,000 years."

What sources were used to come up with the above statements? It seems the recent events listed under section 4.7.2.1 had a frequency of less than 4,800 and 10, 000 years? Is that not true? Where are the facts to support the above statements? Were the recent listed events used in determining the above statements? If they were not then why?

Response GP237-64

Recent events are included in the Federal Railway Administration's database used to derive accident rates. The scale of the nationwide rail system is more than a 1,000 times the length of the PS&P rail line, with a very large number of trains traveling each day. Thus, the likelihood of an incident occurring along any single segment of railroad (such as the PS&P rail line) would be much less than the likelihood of an incident occurring across the nation on the entire mainline railroad system. In addition, the Draft EIS determines the likelihood of an accident on an annual basis. These frequencies can be multiplied by the expected lifetime of the proposed action to determine the overall chance of an accident of a specific size.

Comment GP237-65

Chapter 5 Extended Rail and Vessel Transport

5.4.4.4 Emergency Response Towing Vessel

Under this section of the report it states:

"To help protect Washington's shorelines and waterways, the Washington State maritime industry has permanently stationed an emergency response towing vessel in Neah Bay. The tug is an important safety net to prevent disabled ships and barges from grounding off Washington's outer coast or in the western Strait of Juan de Fuca. Tank vessels transiting to or from a Washington port through the Strait of Juan de Fuca (except for transits extending no further west than Race Rocks Light) must include the emergency response towing vessel stationed at Neah Bay in their oil spill contingency plans (RCW 88.46.130)."

In section 3.17.4.2 the report states:

"The existing emergency response towing vessel at Neah Bay, located at the far northwest corner of Washington State, is available to assist vessels off the coast of Washington and in Puget Sound. It could assist with vessels in a difficult situation in or near Grays Harbor; however, under normal weather conditions, it could take an average of 12 hours to reach the harbor. Under adverse weather conditions, transit time to Grays Harbor could be as much as 18 hours."

How can an emergency response towing vessel stationed in Neah Bay that can take 12 or more hours to reach Grays Harbor be considered an important safety net? Again, according to the Westway and Imperium permits, both companies intend to ship millions of gallons of crude oil from the port of Grays Harbor; therefore why is an emergency response towing vessel not being stationed at the port of Grays Harbor? Why is this not a mandatory recommendation in order for either permit to be considered?

Response GP237-65

Final EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels*, clarifies the emergency response capabilities of the tugs stationed at Grays Harbor.

Comment GP237-66

5.6 What mitigation measures would reduce impacts on rail and vessel transport in the extended study area?

Under this section of the report it states:

"The increase in rail and vessel traffic in the extended study area from the proposed action is small relative to the existing and anticipated future traffic that will occur without the projects. A risk of an incident involving a major spill, fire, explosion, or derailment in the extended study area exists but has a low likelihood based on the small increase in overall rail and vessel traffic due to the proposed action. Therefore, no mitigation is proposed in the extended study area."

Where are the facts to support the above statement? Where are the reports and references to support the above statement?

Response GP237-66

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

Comment GP237-67

Chapter 6 - Cumulative Impacts

Toxic Air Pollutants

Why does this section not include the toxic air pollutants, which include high concentrations of H2S at 1200 parts per million, from the venting of crude oil from rail cars, storage tanks and vessels?

Response GP237-67

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants. As described in Draft EIS Chapter 3, Section 3.2, *Air*, based on air quality modeling for conducted by the applicant, onsite emissions of toxic air pollutants related to routine operations of onsite stationary sources, including hydrogen sulfide, would be below the state thresholds identified in WAC 173-460-150. The Final EIS section reflects updated estimates based on a review of recently published Bakken crude oil data.

Rail and vessel operators are required to adhere to all applicable regulatory requirements intended to ensure the safe passage of freight. Refer to the Master Response for Cumulative Analysis for an explanation of the scope of the analysis in Chapter 6, *Cumulative Impacts*.

Comment GP237-68

6.5.1.3 Mitigation Measures

Where are the mitigation measures for rail cars, storage tanks and vessels venting toxic air pollutants which include high concentrations of H2S at 1200 parts per million?

Response GP237-68

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources.

As described in Draft EIS Chapter 3, Section 3.2, *Air*, based on air quality modeling for conducted by the applicant, onsite emissions of toxic air pollutants related to routine operations of onsite stationary sources, including hydrogen sulfide, would be below the state thresholds identified in WAC 173-460-150. The Final EIS section reflects updated estimates based on a review of recently published Bakken crude oil data. These emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and applicant mitigation that would reduce potential impacts on air quality.

Rail and vessel operators are required to adhere to all applicable regulatory requirements intended to ensure the safe passage of freight. Refer to the Master Response for Mitigation Framework for information about the development and enforcement of mitigation measures.

Comment GP237-69

6.5.5.3 Mitigation Measures

Under this section of the report it states

"To ensure that local emergency service providers have access to areas south of the PS&P rail line in Aberdeen, the applicant will ensure an automobile with an 8-foot clearance and a combination truck (pumper and ambulance) are available for staging south of the PS&P rail line in the Olympic Gateway Plaza for use by local emergency service providers. The applicant will also ensure an ambulance is available for staging south of PS&P rail line in the Port of Grays Harbor area between the project site and Port Industrial Road for use by emergency service providers. These measures will be in place prior to beginning crude oil operations."

How can this mitigation measure get the emergency vehicle to a hospital any faster if the train is blocking the tracks?

Response GP237-69

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Comment GP237-70

6.5.7.3 Mitigation Measures

Under this section of the report it states:

"To improve oil recovery in the case of a spill during vessel loading at the dock, the applicant will retain a licensed engineer to perform an independent engineering analysis and feasibility study to determine the number of days it is safe and effective to preboom oil transfers and to identify site-specific improvements to maximize successful prebooming. The applicant will ensure the study is submitted to Ecology for review. If approved, Ecology will amend the applicant's oil spill contingency to require prebooming and improvements consistent with the study."

Where is the analysis and feasibility study to determine the number of days it is safe and effective to preboom oil transfers and to identify site-specific improvements to maximize successful prebooming? Why is this study not available for public review and comment before the permits are issued?

Response GP237-70

Refer to the Master Response for Mitigation Framework for a discussion of public availability for studies identified in the mitigation measures.

Comment GP237-71

Under this section of the report it states:

"At a minimum, this alternative must include the following elements.

One oil spill response vessel with crew, skimmer, and at least 1,000 feet of boom at the dock."

What are the mitigation measures for recovering Diluted Bitumen, it sinks? Where are the mitigation measures for cleaning up and recovering Diluted Bitumen?

Response GP237-71

It is the constituent chemicals of diluted bitumen that can be acutely toxic. Final EIS 4.7, *Impacts on Resources*, has been revised to more fully describe the potential impacts on human health.

As noted in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, such plans are not required prior to operations and have not been developed. However, once the plans have been submitted to Ecology, such as the contingency plan required by WAC 173-186, they will be available for public review and comment for a period of 30 days. Refer to the Master Response for the Purpose and Focus of the EIS.

To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP237-72

Under this section of the report it states:

"To reduce the risks and impacts from an oil spill, prior to beginning the proposed operations the applicant will conduct a study to identify an appropriate level of financial responsibility for the potential costs for response and cleanup of oil spills, natural resource damages, and costs to state and affected counties and cities for their response actions."

Where is the above study and why is not available for public review in the EIS?

Response GP237-72

Refer to the Master Response for Mitigation Framework for a discussion of public availability for studies identified in the mitigation measures.

Comment GP237-73

Under this section of the report it states:

"Due to sensitivity of the local environment, tribal resource concerns, and the potential presence of special-status species, to improve coordination and response capabilities in the event of a rail accident, the applicant will not accept crude oil by rail unless PS&P prepares, submits to Ecology for approval, and implements a contingency plan meeting the requirements identified below. This requirement will remain in place until state contingency plan requirements for railroads are implemented by Ecology pursuant to ESHB 1449, Section 5, and/or amendments to the federal oil spill response plan rule (49 Code of Federal Regulations 130) is adopted."

Where is the contingency plan for public review in the EIS?

Response GP237-73

Applicable plans would be prepared and permits would be issued after the publication of the Final EIS. Refer to the Master Response for the Purpose and Focus of the EIS. State approved contingency plans are made available for public review and comment when complete.

Comment GP237-74

6.5.8.1 Rail Traffic

Under this section of the report it states:

"More specifically, the following impacts could occur as more trains, including the anticipated increases in Class I freight rail traffic, travel along the BNSF main line routes. - Increased emissions resulting from more diesel trains."

Where are the impacts of toxic air pollution being vented from the oil rail cars? Why is this not listed as an impact that would occur?

Response GP237-74

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment,*

Impacts, and Mitigation, which presents a detailed analysis of potential impacts on air in the study area related to the proposed action. As noted in Section 3.2, *Air*, the release of toxic air pollutants during rail transport related to the proposed action is not anticipated to be significant. Chapter 6, *Cumulative Impacts*, similarly addresses these potential impacts from the cumulative projects.

Comment GP237-75

Chapter 7-Economics, Social Policy, and Cost-Benefit Analysis

Under this section of the report it states:

"The proposed action would generate an estimated 73 jobs throughout the County's economy. These jobs would account for $3.6 million in annual direct labor income and benefits and $5.1 million in total labor income and benefits throughout the County's economy (Table 7-7)."

Really, 73 jobs? What exactly would be the economic loses to the thousands of direct sea resources jobs when an oil spill puts those individuals out of work? What would be the economic loses for all the indirect jobs that support the sea resources industry when an oil spill occurs? Why are these figures not included in this report? Is it not supposed to be a **Cost**-Benefit Analysis? So where are the costs?

The Cost-Benefit Analysis of the report is totally bogus plain and simple. If exact figures can be estimated for Benefits then the same can be said for **Costs**. What a bunch of malarkey stating repeatedly throughout this chapter "It is not possible to estimate how much…" loses would be. The lack of costs associated with any oil spill/explosion to a particular entity whether it be the shellfish industry or community etc…. is appalling. It is imperative the **exact costs** related to cleanup activities and related degradation be fully listed in this section of the document. Do the work!

Response GP237-75

Draft EIS Section 7.1.4, *What are the potential impacts on economic conditions?* describes the estimated impacts on employment associated with the construction and operation of the proposed action, including the number of direct, indirect, and induced jobs that would be generated as a result of the project. Final EIS Chapter 7, Section 7.3.4.2, Po*tential Costs Related to Environmental Health and Safety Concerns,* reflects additional information on the economic and social costs of oil spills. This includes information on derailments and other accidents involving trains carrying crude oil and information on a crude oil spill during marine transport. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP238, **Figlar-Barnes, Ron**

Comment GP238-1

Westway and Imperium Expansion Projects Draft Environmental Impact Statements Here are my comments regarding the DEIS. These project should not have gone this far in the process. Several concerns can not be mitigated. The projects endanger so many communities and environments it is amazing that the Department of Ecology did not deny the permits immediately. Attached are my questions regarding the DEIS.

Westway and Imperium DEIS

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ICF International and Ms. Toteff,
Westway and Imperium crude oil-by-rail terminal EIS

Thank you for the opportunity to comment again on these two projects. In previous correspondences and testimony we expressed our disbelief that these type of projects would be proposed in an area which is susceptible to sea level rise, earthquake activity and is in a tsunami zone. Despite the logic for rejection of these proposals due to these major factors we are still going through the process asking for the permits to be denied. According to the Washington Administrative Code [WAC 197-11-560] it is the responsibility of the lead agency to respond to our questions. As stated,

"The lead agency must consider comments received during the draft EIS comment period, and respond to them in the final EIS Lead agency responses—comments should be as specific and informative as possible.

Possible responses are to:

- Explain how the alternatives, including the proposed action, were modified;

- Identify new alternatives that were created;

- Explain how the analysis was supplemented, improved, or modified;

- Make factual corrections; or

- Explain why the comment does not warrant further agency response.

Since all of our questions will be specific and we are requesting specific answers. As stated in the DEIS "in all likelihood, the projects will have an accidents", oil will spill, or an explosion will occur and the community will suffer loss. Since this is the basic conclusion of the DEIS, that accidents are unavoidable, we ask; how can a project be permitted when there is no mitigation for loss? How can a non-mitigatable human activity be allowed?

For our questions, we want to see the specific mitigation actions for each of our concerns. For example, who will pay the businesses and individuals associated with economic loss or loss of life associated with the transport and siting of these oil terminals when an unavoidable accident occurs. How and who will evaluate loss?

The DEIS has determined that the projects' (1), will increase rail and marine vessel traffic (2), would increase the risk of a derailment, collision, spill, fire, or explosion. (3), the projects would cause increased air pollution from more diesel trains and vessels (4), will increased noise (5), would have

harmful impacts on tribal resources (6), will increase vehicle delay at railroad crossings large enough to disrupt emergency vehicle response times. According to the DEIS all of these impacts cannot be fully mitigated. So, revoke the permits. It is not acceptable to permit these facilities and then rely on the proposers to build or plan the components without public input and scrutiny.

Response GP238-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP238-2

Here are our first questions,

(1) What type of containment will protect tanks from a tsunami with waves of 40 to 100 ft. high as projected for a major offshore earthquake? We want to see the plans and designs before the permits are allowed. Oh that's right--- a tsunami of that size cannot be mitigated however, a tsunami of that size is what's projected *(The Oregon Resilience Plan Reducing Risk and Improving Recovery for the Next Cascadia Earthquake and Tsunami, Report to the 77th Legislative Assembly from Oregon Seismic Safety Policy Advisory Commission (OSSPAC) Salem, Oregon February 2013).*

Response GP238-2

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction. This master response also addresses the iterative, ongoing risk assessment and design processes, including the opportunity for public review, commensurate with the project's stage in development.

Comment GP238-3

(2) **Table 3.1-2**, "The Probability of Stronger Earthquakes in the Study Area" needs to be revised to show the latest data by Goldfinger *(U.S. Geological Survey Professional Paper 1661–F 2012).* The 8.0 or greater projections are not 10-12 percent—it's **37 percent** and there is a one and three chance an earthquake of this magnitude will occur in next 50 years. How can you justify allowing these terminal upgrades when data shows the probability of a damaging earthquake in the next 50 years?

Response GP238-3

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

Comment GP238-4

(3) In the DEIS your assumptions about climate change assume sea-level will stop rising at the end of the century, but NASA studies conclude the loss of sheet ice will continue for centuries. How can you use information that is clearly a minority opinion? *(America's Climate Choices: Panel on Advancing the Science of Climate Change,* Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, considers the impacts of sea-level rise in 2050. It does not assume that this is the

endpoint of sea-level change, but it is a reasonable period for considering the impacts on the proposed facilities*., Division on Earth and Life Studies, NATIONAL RESEARCH COUNCIL OF THE NATIONAL ACADEMIES (2010). "7 Sea Level Rise and the Coastal Environment". Advancing the Science of Climate Change. Washington, D.C.: The National Academies Press. p. 245. ISBN 978-0-309-14588-6. Retrieved 2011-06-17).*

Response GP238-4

Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, considers the impacts of sea-level rise in 2050. It does not assume that this is the endpoint of sea-level change, but it is a reasonable period for considering the impacts on the proposed facilities.

Comment GP238-5

(4) In your final EIS please describe how oil trains will affect the health safety and welfare of other communities along the train route.

Response GP238-5

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to clarify the potential impacts on human health that could occur as the results of incidents involving the spill of crude oil or as the result of related fires or explosions related to the proposed action. Consistent with the approach to the risk assessment as discussed in the Master Response for Environmental Health and Safety, the discussion of impacts is presented in general terms.

Comment GP238-6

(5) The DEIS cites the Contingency Plan regarding preparations for oil spills on the Chehalis River. Although we appreciate the effort put into the plan, it is unrealistic. Citing this plan as a solution to rail or marine oil spills is troubling. For example, the scope of the plan is large and the cost for personnel and equipment to cover each of the contingencies is prohibitive. The training of personnel to cover each area needs to be well coordinated and we wonder if that can be accomplished.

A plan is only as good as the actions implemented during an emergency. We believe it will be difficult at best to protect the natural resources of the area if a spill occurs due to a number of factors. These include: (1) Training of local teams: how will Ecology plan to prepare local groups? (2) Supplies needed to accomplish protection: how will Ecology supply these items? (3) Long-term readiness for a major oil spill and how will Ecology maintain this long-term readiness? Has long-term funding been for the effort been identified?

So much of the Contingency Plan depends on calm weather or slack tide. It is doubtful there will be either when a spill occurs. It would be better to plan for extreme weather and hope a spill occurs on a nice day with a corresponding slack tide, or, as the saying goes, plan for the worst but hope for the best!

Several response strategy locations in the lower Chehalis (sector CHER-1A) are in the slough areas and must rely on booms to protect wetlands and critical habitat. Many of these sites can only be accessed if a responder boat can get to them and some locations are inaccessible during low tide. How do you plan to respond in those areas? Have you identified boats to match shallow water areas? Is boat size important for deploying booms? Blue Slough mouth is an example of where

adverse weather conditions may make the required towing of booms quite difficult if not impossible. What are the contingencies for such areas? After deployment how will boom be monitored? The existing boat launches are distant to some selected locations; will responders be able to get to those locations in adverse weather conditions and to the response locations in an appropriate timeframe? How was the "Potential Oil Spill Points"decided? Looking at a map for the route especially in the lower Chehalis River many more locations exist where a crude by rail spill could occur which are not marked. How does having a spill in a different location affect your response plan? Although, we respect the efforts of the Washington Department of Ecology Spill Prevention, Preparedness, and Response (CHER-GRP) team to put together an oil spill plan for the Chehalis River. However, the plan is problematic and citing it in the DEIS as a solution that will reduce the impacts of an oil spill related to crude by rail or the oil terminals is overly optimistic.

Ecology and the City of Hoquiam should use the analysis and findings in the DEISs to reject these terminals. Since the risks of oil spills during rail transport, at the terminal site, and during marine vessel transport through Grays Harbor cannot be fully mitigated and if a spill occurred, the environmental damage would be significant. The permits for terminals in Grays Harbor should be denied.

Response GP238-6

Final EIS Chapter 4, *Environmental Health and Safety*, has been revised to clarify the application of existing geographic response planning to the proposed action and to include additional applicant measures to address increased risks related to the proposed action. Nonetheless, existing regulations and proposed mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources,* describes the types of impacts that could result from an oil spill, fire, or explosion. As noted above, the City of Hoquiam will make a determination on the land use permit application submitted by the applicant to construct and operate the proposed facilities. Evaluation of the proposal will include the information presented in the Final EIS, including the potential for significant and unavoidable adverse impacts.

Comment GP238-7

Below are specific issues associated with specific DEIS by chapters.

Chapter 3.1 Earth

Understanding the types of soils and the underlying geologic conditions is important in determining whether a project would be exposed to increased risks related to these conditions.

From the DEIS: two separate areas. On page 3.1.13 it is stated,

"The Hoquiam-Aberdeen area is underlain by sandy gravel, which is susceptible to liquefaction. The Hoquiam-Aberdeen shoreline, including the project site, is mapped as having a high liquefaction hazard (Slaughter et al. 2013); consequently, these areas are susceptible to liquefaction during a strong (6.0 magnitude or greater) earthquake. This high hazard zone extends up to 0.5 mile inland from the shoreline of the harbor". Then on page 3.1.11 the DEIS states,

The probabilities of earthquakes of magnitude 6.0 to 9.0 and greater affecting the study area.

• *At the project site, a magnitude 6.0 earthquake has a 30 to 40% likelihood of occurring once in 50 years.*

• *An earthquake of magnitude 9.0 or greater has a lower likelihood of occurring, 6 to 8% chance within a 50-year window."*

Using this DEIS information, the permit it is understood the site will experience an earthquake which will cause significant damage in the next 50 years which is troubling enough. **However, the earthquake data in the DEIS is now outdated.** Research from scientist at the Oregon State University suggests the assumptions made by the DEIS are underestimated at best. The major earthquakes that devastated Chile and which triggered the catastrophic Indonesian tsunami of 2004 are more than just a distinct possibility to strike the Pacific Northwest coast of the United States. There is more than a one-in-three chance that it will happen within the next 50 years.

New analyses by Oregon State University marine geologist Chris Goldfinger and his colleagues have provided fresh insights into the Northwest's turbulent seismic history – where magnitude 8.2 (or higher) earthquakes have occurred 41 times during the past 10,000 years. Those earthquakes were thought to generally occur every 500 years, but as scientists delve more deeply into the offshore sediments and other evidence, they have discovered a great deal more complexity to the Cascadia Subduction Zone. According to Goldfinger, "What we've found is that Cascadia isn't one big subduction zone when it comes to major earthquakes," Goldfinger said. "It actually has several segments – at least four – and the earthquake activity is different depending on where a quake originates. The largest earthquakes occur in the north and usually rupture the entire fault. These are quakes of about magnitude-9 and they are just huge – but they don't happen as frequently.

"At the southern end of the fault, the earthquakes tend to be a bit smaller, but more frequent," he added. "These are still magnitude-8 or greater events, which is similar to what took place in Chile, so the potential for damage is quite real."

Based on historical averages, Goldfinger says the southern end of the fault – from about Newport, Ore., to northern California – **has a 37 percent chance of producing a major earthquake in the next 50 years.** The odds that a mega-quake will hit the northern segment, from Seaside, Ore., to Vancouver Island in British Columbia, are more like 10 to 15 percent.

"Perhaps more striking than the probability numbers is that we can now say that we have already gone longer without an earthquake than 75 percent of the known times between earthquakes in the last 10,000 years," Goldfinger said. "And 50 years from now, that number will rise to 85 percent."

Understanding the Cascadia Subduction Zone history is further complicated by the possibility that major earthquakes in the northern segment have occurred in "clusters." A thousand years may go by without a major event, and then an earthquake would occur every 250 years or so.

In fact, the science is robust, and one of the chief scientists behind it is Chris Goldfinger. Thanks to work done by him and his colleagues, **we now know that the odds of the big Cascadia earthquake happening in the next fifty years are roughly one in three. The odds of the very big one are roughly one in ten** *(U.S. Geological Survey Professional Paper 1661–F) -- U.S. Department of the Interior U.S. Geological Survey U.S. Geological Survey, Reston: Virginia 2012*.

We believe this new research warrents a new analysis of risk of an earthquake and tsunami at the project site. Can you explain why allowing a significant increase in risk of toxic oil

contamination should be allowed? Permits should not be issued if the DEIS review shows a one and three (37%) this problematic outcome.

1) What type of mitigation and insurance measures are in place if an earthquake and tsunami impacts the oil facilities? Who pays for the cleanup? The Tohoku Japan tsunami in 2011 caused fuel storage containers in Japan to fail. Failure of these containers resulted in major damage to Japanese cities where fuel leaked out of the containment basins that surrounded the storage areas. Oil damage is difficult to clean up and often precludes rehabilitation of any contaminated structures.

2) What types of storage tanks are being proposed and what is the rating for withstanding a tsunami event? We want to know before a permit is issued.

3) What type of cable system will be used to ensure the storage tanks will remain secure during a tsunami event? We want to know before a permit is issued.

The Westway and Imperium sites are located on soils derived from dredge materials that have a high liquefaction susceptibility factor. Both locations are rated by the National Earthquake Hazards Reduction Program as a seismic class D-E site. However, both proposed bulk facility projects are located on past lagoon fills (figure 1). Since the surrounding areas which weren't lagoon fills are Classified D-E [Footnote 1: D-E sites:

- Structures must be designed to resist seismic forces.

- Only structural systems that are capable of providing superior performance permitted.

- Many types of irregularities are prohibited.

- Nonstructural components that could cause injury must be provided with seismic restraint.

- Nonstructural systems required for life safety protection must be demonstrated to be capable

- Nonstructural systems required for life safety protection must be demonstrated to be capable of post-earthquake functionality.

- Special construction quality assurance measures are required.] does this indicate the site class for the specific project area needs to re-classified to a more susceptible level like F?

4) Why is there a difference of 75 feet regarding piles driven into the ground from the proponents?

5) What are the piles being driven into? What do the well logs show? Has there been a detailed geologic assessments conducted?

6) What is the depth to bed rock?

7) The project is located in a potentially earthquake and liquefaction hazard zone; how are you going to mitigate if an accident occurs? What type of insurance and coverage do the proponents have?

Attached is a map showing various earthquake faults, earthquakes and liquefaction potential near Grays Harbor. As the map shows there are many fault systems associated with the project site. What earthquake impacts are anticipated from (1). Canyon River, (2) Cascadia, (3) Saddle Mountain, (4) Tacoma, and (5) Langley Hill?

8) Has there been an assessment regarding the structural damage that would happen during a smaller 5 to 7 magnitude event to the proposed facility?

9) How can you explain the practicability of increasing the oil capacity of these facilities knowing the dangers associated with their location?

[Figure 1 Liq Sucep - project locations; reviewed but not reproduced.]

Response GP238-7

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

1. Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events. Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

2. Refer to the Master Response for Seismic Risk and Design Requirements for more information about the iterative, ongoing risk assessment and design processes commensurate with the project's stage in development. Designs and the permit application that are public records will be available for review during the design and permitting process.

3. Refer to the Master Response for Seismic Risk and Design Requirements for more information about the iterative, ongoing risk assessment and design processes commensurate with the project's stage in development. Designs and the permit application that are public record will be available for review during the design and permitting process.

4. Final EIS Chapter 3, Section 3.1, *Earth*, clarifies the approximation of pile depth. According to the investigations completed at the project site, the majority of the site consists of gravel to about 40 feet below the surface underlain by loose to dense sandy gravel to a depth of about 130 feet below the surface. Figure 8 of the Hart Crowser report (2013; as cited in Section 3.1, *Earth*) indicates competent soil is generally reached at 150 feet below-ground surface. Estimates in the REG (formerly Imperium Terminal Services) Expansion Project Draft EIS are based on subsurface investigations completed for that project site.

5. Proposed piles would be driven to necessary depths to reach required embedment into competent soils. Refer to the Master Response for Seismic Risk and Design Requirements for information about the iterative, ongoing risk assessment and design processes commensurate with the project's stage in development.

6. Figure 8 of the Hart Crowser report (2013; as cited in Section 3.1, *Earth*) indicates competent soil is generally reached at 150 feet below-ground surface.

7. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential

impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction. Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS. The Draft EIS considers the impacts related to a large earthquake, and smaller events are considered by inclusion in the consideration of the larger and more intense seismic event.

8. The Draft EIS considers the impacts related to a large earthquake, and smaller events are considered by inclusion in the consideration of the larger and more intense seismic event.

9. As noted in the Master Response for Project Objective and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant.

Comment GP238-8

Chapter 3.2 Air

1. Impacts on climate change. In order to have any chance to stave off global warming disaster, we must start weaning ourselves off of fossil fuels. The DEIS discusses the direct emissions from the rail-transportation part of these projects, and finds a 2.6% increase in greenhouse gas emissions from rail in Washington—over 30,000 metric tons of carbon dioxide equivalent each year. **The DEIS improperly limits its cumulative effects on climate change analysis to the Grays Harbor terminals,** even though federal agencies, like the U.S. Fish and Wildlife Service, have called on Ecology and Hoquiam to review the cumulative impacts of all oil and coal shipping terminals proposed for Washington ports. The 2.6% increase in DEIS for Greenhouse gases for Grays Harbor does not get at the real impacts associated with the project. We want to see the total Greenhouse gases for the entire process—what are those totals? From fracking to the transport across the states involved in rail transport. What is the cumulative impact of Greenhouse gases on climate change? What is the impact of increased Greenhouse gasses on the snow of the Cascades and Olympic Peninsula? How does increasing temperature and changes in the climate translate to our agricultural economy? What effect does the increases in Greenhouse gasses effect our seafood industry? Again, we want to see a comprehensive analysis of the total potential impacts. From the fracking of the product to the transportation of the product, to the storing and shipping of the product, and finally to the final burning of the product.

Response GP238-8

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, describes the projected impacts of climate change in the Pacific Northwest.

Comment GP238-9

2. There needs to be a baseline assessment of the current conditions of Grays Harbor! Then there needs to be a way to monitor the potential air pollution associated with the projects. What type of monitoring will be done? Where will monitoring location be placed?

Response GP238-9

As described in Section 3.2.6, *What required permits and plans apply to air quality?* the proposed action is subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record-keeping requirements for onsite stationary sources.

Comment GP238-10

3. Train impacts: There needs to be side air pollution detectors in the study area. What types of air pollution detector are proposed for the rail potion of the project? Will inspectors use infrared cameras to detect vapor leaks? If not why how will vapor leaks be detected?

Response GP238-10

Rail operators are required to adhere to all applicable regulatory requirements intended to ensure the safe passage of rail freight. Refer to the Master Response for Mitigation Framework for information about the development and enforcement of mitigation measures.

Comment GP238-11

4. How will the crude oil rail cars be vented to protect the air quality people and animals breath as the rail cars travel from North Dakota to Grays Harbor?

We want to know the long term outlook for maintenance of air pollution controls for the plants. What type of system will be used? Will air pollution be monitored 24 hours and if problems occur what will be the procedures to protect the surrounding communities from airborne toxics?

Response GP238-11

Rail operators are required to adhere to all applicable regulatory requirements intended to ensure the safe passage of rail freight.

Comment GP238-12

1) How will the oil tanks at Westway and Imperium be vented to protect the air quality people and animals breath in the Port of Grays Harbor and surrounding communities?

2) How will the transfer of oil from the tanks to vessels be vented to protect the air quality people and animals breath in the Port of Grays Harbor and surrounding communities?

Response GP238-12

As described in Draft EIS Chapter 3, Section 3.2, *Air*, the proposed action is subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary

sources. Refer to the Draft EIS for a list of permit conditions and proposed applicant mitigation that would reduce potential impacts on air quality.

Comment GP238-13

Chapter 3.4 Water

In your assumptions about climate change you assume sea-level will stop rising at the end of the century, but NASA studies conclude the loss of sheet ice will continue for centuries *(America's Climate Choices: Panel on Advancing the Science of Climate Change, Board on Atmospheric Sciences and Climate, Division on Earth and Life Studies, NATIONAL RESEARCH COUNCIL OF THE NATIONAL ACADEMIES (2010). "7 Sea Level Rise and the Coastal Environment". Advancing the Science of Climate Change. Washington, D.C.: The National Academies Press. p. 245. ISBN 978-0-309-14588-6. Retrieved 2011-06-17).*

In 2015 study by sea level rise experts concluded that based on MIS 5e data, sea level rise could rise faster in the coming decades, with a doubling time of 10, 20 or 40 years. This research was conducted by thirteen of the leading climate change scantiest in the world have now predicted that sea level is rising at an accelerated rate *(J. Hansen, M. Sato, P. Hearty, R. Ruedy, M. Kelley, V. Masson-Delmotte, G. Russell, G. Tselioudis, J. Cao, E. Rignot, I. Velicogna, E. Kandiano, K. von Schuckmann, P. Kharecha, A. N. Legrande , M. Bauer, and K.-W. Lo (2015). "Ice melt, sea level rise and superstorms: evidence from paleoclimate data, climate modeling, and modern observations that 2?C global warming is highly dangerous" (PDF). Atmospheric Chemistry and Physics (ACP). doi:10.5194/acpd-15-20059-2015).*

Additional work has been published by. R. Winkelmann, A. Levermann, A. Ridgwell, K. Caldeira. Combustion of available fossil fuel resources sufficient to eliminate the Antarctic Ice Sheet. Science Advances, 2015; 1 (8): e1500589 DOI: 10.1126/sciadv.1500589, they concluded the Antarctic Ice Sheet stores water equivalent to a 58 meter in global sea-level rise. They show in simulations using the Parallel Ice Sheet Model that burning the currently attainable fossil fuel resources is sufficient to eliminate the ice sheet. With cumulative fossil fuel emissions of 10,000 gigatonnes of carbon (GtC), Antarctica is projected to become almost ice-free with an average contribution to sea-level rise exceeding **3 meters per century** during the first millennium. Consistent with recent observations and simulations, the West Antarctic Ice Sheet becomes destabilized and melt the ice basins in both West and East Antarctica results in a threshold increase in global sea level. Unabated carbon emissions thus threaten the Antarctic Ice Sheet in its entirety with associated sea-level rise that far exceeds that of all other possible sources. Why would we want to put a new oil terminal in a location that will be susceptible to this type of change over the next 50 years?

Recent reasons to be concern about Grays Harbor include (1) Storm waves near the Grays Harbor South Jetty threatened City of Westport facilities and a state park including the South end of Ocean Shores. Increasing sea level will increase the problem and will create problems with erosion and sediment movement in Grays Harbor. What studies have been done to look at the potential impacts of such changes to the shipping channel of Grays Harbor? (2) High erosion rates at North Willapa Bay! At Washaway Beach more than 100 homes have fallen into the ocean in the last 20 years, including the entire town center of North Cove. This type of erosion due to sea-level rise will be more pronounced. Recently higher than predicted tides have occurred in Grays Harbor and the rest of Washington, this type of change is predicted by the extreme sea level rise events of climate change.

There have also been larger than usual rainfall events in the area. How do atmospheric rivers of moisture impact the oil terminals sites? Stormwater and asphalt surfaces can impact water quality. How will the terminal locations deal with large amounts of rainfall and saturated soils?

Response GP238-13

Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts, Climate Change*, clarifies predictions of sea level change in the project area and potential for flooding at the project site. With predicted sea level rise in the project area for 2050 of 1.57 feet, the project site will remain approximately 5 feet higher than the projected high tide. As such, it would not be subject to flooding even during extreme storm events. Regarding the other points, refer to the Master Response for the Purpose and Focus of the EIS.

Comment GP238-14

Chapter 3.5 Plants

Native Americans have used Grays Harbor for many years as a repository of plants for basket weaving and medicinal herbs. What impacts will the sites have on traditional access to treaty-protected resources of Tribes to gather these plants? What value will be put on native vegetation that would be destroyed if an oil spill occurs in Grays Harbor and along the coast?

Response GP238-14

Draft EIS Chapter 3, Section 3.12.5.2, *Proposed Action*, describes potential impacts on tribal resources from construction and routine operation of the proposed action. Potential impacts from oil spills, fires, or explosions are addressed in Draft EIS Chapter 4, *Impacts on Resources*, including impacts on plants and tribal resources. The process for determining damages for an oil spill, including impacts on plants, is called a natural resource damage assessment, as defined in WAC 173-183.

Comment GP238-15

According to the DEIS invasive species are present at the project sites—how will the proponents insure invasive will not propagate due to building and production activities?

Response GP238-15

As noted in Draft EIS Chapter 3, Section 3.4, *Plants*, the applicant would prevent the potential establishment and spread of noxious weeds during construction and operation per Washington State noxious weed regulations (RCW 17.10). This weed law establishes and spells out property owners' responsibilities for preventing and controlling the spread of noxious weeds. If a property owner fails to control noxious weeds, the local weed board can impose civil fines for failure to control weeds. Any weeds removed from the project site would be disposed in accordance with these regulations.

Comment GP238-16

Ballast water is carried by empty vessels to provide stability during transit. As vessels are loaded with cargo, ballast water is discharged to balance the weight of the new cargo. What types of

measures will be used to insure both plant and animal invasive species will not be present in the discharged water into Grays Harbor?

Response GP238-16

Draft EIS Chapter 3, Section 3.3, *Water*, Section 3.4, *Plants*, and Section 3.5, *Animals*, describe potential ballast water impacts and the regulatory requirements to reduce these impacts. Section 3.4.7.1, *Applicant Mitigation*, and Section 3.5.7.1, *Applicant Mitigation*, identify mitigation measures to further reduce potential impacts.

Comment GP238-17

This section should include mitigation for all spills, leaks, and explosions throughout the entire corridor, including in remote areas where support vehicle access is very limited.

Response GP238-17

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or within Grays Harbor, respectively.

Comment GP238-18

Chapter 3.6 Animals

It is very important to take into consideration all animals that could be affected by the citing of oil terminals in Grays Harbor. **Specifically we want to know how the following species are going to be protected.**

1) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Endangered Bucaccio Rockfish?

2) How will an oil spill response plan for the coast of Washington ensure the protection of the Federally Endangered Snake River Sockeye Salmon?

3) How will a rail oil spill response plan for the Columbia River ensure the protection of the Federally Endangered Snake River Sockeye Salmon?

4) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Threatened Bull Trout?

5) How will a rail oil spill response plan for Grays Harbor drainages ensure the protection of the Federally Threatened Bull Trout?

6) How will an oil spill response plan for the coast of Washington ensure the protection of the Federally Threatened Canary Rockfish?

7) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Threatened Columbia River Chinook Salmon?

8) How will a rail oil spill response plan for the Columbia River ensure the protection of the Federally Threatened Columbia River Chinook Salmon?

9) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Threatened Columbia River Chum Salmon?

10) How will a rail oil spill response plan for the Columbia River ensure the protection of the Federally Threatened Columbia River Chum Salmon?

11) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Threatened Columbia River Coho Salmon?

12) How will a rail oil spill response plan for the Columbia River ensure the protection of the Federally Threatened Columbia River Coho Salmon?

13) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Threatened Columbia River Steelhead Trout?

14) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Threatened Green Sturgeon?

15) How will a rail oil spill response plan for the Columbia River ensure the protection of the Federally Threatened Green Sturgeon?

16) How will a rail oil spill response plan for the Columbia River ensure the protection of the Federally Threatened Columbia River Steelhead Trout?

17) How will an oil spill response plan for Grays Harbor and the coast of Washington ensure the protection of the Federally Threatened Eulachon?

18) How will a rail oil spill response plan for the Columbia River ensure the protection of the Federally Threatened Eulachon?

19) How will an oil spill response plan for the coast of Washington ensure the protection of the Federally Threatened Hood Canal Summer Chum Salmon?

20) How will an oil spill response plan for the coast of Washington ensure the protection of the ederally Threatened Ozette Lake Sockeye Salmon?

21) How will an oil spill response plan for the coast of Washington ensure the protection of the Federally Threatened Puget Sound Chinook Salmon?

22) How will an oil spill response plan for the coast of Washington ensure the protection of the Federally Threatened Puget Sound Steelhead Trout?

23) How will an oil spill response plan for Grays Harbor and the coast of Washington ensure the protection of the Federally Threatened Yelloweye Rockfish?

24) How will an oil spill response plan for Grays Harbor and the coast of Washington ensure the protection of the Federal Species of Concern Copper Rockfish?

25) How will an oil spill response plan for Grays Harbor and the coast of Washington ensure the protection of the State Candidate Greenstriped Rockfish?

26) How will a rail oil spill response plan for the Grays Harbor drainages ensure the protection of the State Sensitive Olympic Mudminnow?

27) How will an oil spill response plan for the coast of Washington ensure the protection of the State Candidate and Federal Species of Concern Pacific Hake?

28) How will an oil spill response plan for the coast of Washington ensure the protection of the State Candidate and Federal Species of Concern Quillback Rockfish?

29) How will an oil spill response plan for the coast of Washington ensure the protection of the State Candidate and Federal Species of Concern Pacific Herring?

30) How will an oil spill response plan for Grays Harbor and the coast of Washington ensure the protection of the State Candidate and Federal Species of Concern Quillback Rockfish?

31) How will an oil spill response plan for Grays Harbor and the coast of Washington ensure the protection of the State Candidate Redstripe Rockfish?

32) How will an oil spill response plan for Grays Harbor and the coast of Washington ensure the protection of the State Candidate and Federal Species of Concern River Lamprey?

33) How will a rail oil spill response plan for the Grays Harbor drainages ensure the protection of the State Candidate and Federal Species of Concern River Lamprey?

34) How will an oil spill response plan for the coast of Washington ensure the protection of the State Candidate Tiger Rockfish?

35) How will an oil spill response plan for the coast of Washington ensure the protection of the State Candidate Widow Rockfish?

36) How will an oil spill response plan for Grays Harbor and the coast of Washington ensure the protection of the Federal Species of Concern Pacific Lamprey?

37) How will a rail oil spill response plan for the Western and Eastern Washington ensure the protection of the Federal Species of Concern Pacific Lamprey?

38) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Leopard Dace?

39) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Umatilla Dace?

40) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Mountain Sucker?

41) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Sensitive and Federal Species of Concern Pygmy Whitefish?

Specific Areas of Concern Bird Life:

42) How will an oil spill response plan for Grays Harbor and the coast of Washington ensure the protection of the Federally Threatened Marbled Murrelet which spends most of its life within 5 miles of the Washington coast?

43) How will an oil spill response plan for Grays Harbor and the coast of Washington ensure the forage fish for the Marbled Murrelet which includes the Pacific Herring, Anchovy, Pacific Sand Lance, Capelin and Krill will be protected from a spill?

44) How will a rail oil spill response plan for the Eastern Washington ensure the protection of the State Endangered American White Pelican?

45) How will an oil spill response plan for Grays Harbor and the coast of Washington ensure the protection of the State Endangered and Federal Species of Concern Brown Pelican?

46) How will a rail oil spill response plan for the Eastern Washington ensure the protection of the State Endangered Sandhill Crane?

47) How will an oil spill response plan for Grays Harbor and the coast of Washington ensure the protection of the Federally Threatened Snowy Plover?

48) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Sensitive and Federal Species of Concern Bald Eagle?

49) How will a rail oil spill response plan for all of Washington State ensure the protection of the State Sensitive and Federal Species of Concern Bald Eagle?

50) How will a rail oil spill response plan for all of Washington State ensure the protection of the State Candidate and Federal Species of Concern Northern Goshawk?

51) How will a rail oil spill response plan for Western Washington State ensure the protection of the State Candidate Pileated Woodpecker?

52) How will a rail oil spill response plan for South Western Washington State ensure the protection of the State Candidate Purple Martin?

53) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Candidate Cassin's Auklet?

54) How will a rail oil spill response plan for all of Washington State ensure the protection of the State Sensitive and Federal Species of Concern Peregrine Falcon?

55) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Candidate Brandt's Commorant?

56) How will a rail oil spill response plan for all of Washington State ensure the protection of the State Candidate and Federal Species of Concern Yellow-billed Cuckoo?

57) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Candidate Common Murre?

58) How will a rail oil spill response plan for the Eastern Washington ensure the protection of the State Threatened Ferruginous Hawk?

59) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Candidate Tufted Puffin?

60) How will a rail oil spill response plan for the Eastern Washington ensure the protection of the State Candidate Flammulated Owl?

61) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Candidate Western Grebe?

62) How will a rail oil spill response plan for all of Washington State ensure the protection of the State Candidate Western Grebe?

63) How will a rail oil spill response plan for all of Washington State ensure the protection of the State Candidate Golden Eagle?

64) How will a rail oil spill response plan for the Eastern Washington ensure the protection of the State Threatened Columbian Sharp-tailed Grouse?

65) How will a rail oil spill response plan for all of Washington State ensure the protection of the State Sensitive Common Loon?

66) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Sensitive Common Loon?

67) How will a rail oil spill response plan for the Eastern Washington ensure the protection of the State Threatened and Federal Candidate Greater Sage Grouse?

68) How will a rail oil spill response plan for the Eastern Washington ensure the protection of the State Candidate Burrowing Owl?

69) How will a rail oil spill response plan for Southwestern Washington ensure the protection of the Federally Threatened Streaked Horned Lark?

70) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Threatened Streaked Horned Lark?

Specific Areas of Concern Mammals:

71) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Endangered Blue Whale?

72) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Endangered Northern Sea Otter?

73) How will a rail oil spill response plan for Southwest Washington ensure the protection of the Federally Threatened Tenino Pocket Gopher?

74) How will a rail oil spill response plan for Southwest Washington ensure the protection of the Federally Threatened Yelm Pocket Gopher?

75) How will a rail oil spill response plan for Southwest Washington ensure the protection of the State Threatened Mazama (western) Pocket Gopher?

76) How will a rail oil spill response plan for Southwest Washington ensure the protection of the Federally Endangered Columbian White-tailed Deer?

77) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Endangered Sperm Whale?

78) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Threatened and Federal Species of Concern Stellar Sea Lion?

79) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Endangered Fin Whale?

80) How will a rail oil spill response plan for the Eastern Washington ensure the protection of the State Species of Concern White-tailed Jack Rabbit?

81) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Species of Concern Gray Whale?

82) How will a rail oil spill response plan for the Eastern Washington ensure the protection of the Federally Endangered Gray Wolf?

83) How will a rail oil spill response plan for Southwest Washington ensure the protection of the State Threatened Western Gray Squirrel?

84) How will a rail oil spill response plan for Southwest Washington ensure the protection of the State Candidate Gray-tailed Vole?

85) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Candidate Harbor Porpoise?

86) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Endangered Humpback Whale?

87) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Endangered Killer Whale?

Specific Areas of Concern Mollusk:

88) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate California Floater?

89) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Dalle's Sideband?

90) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Columbia Oregonian Mollusk?

91) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Columbia Pebblesnail?

92) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Candidate Northern Abalone?

93) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Giant Columbia River Limpet?

94) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the State Candidate Newcomb's Littorine Snail?

Specific Areas of Concern Reptiles and Amphibians:

95) How will a rail oil spill response plan for the Black River drainage in Grays Harbor ensure the protection of the State Endangered and Federal Candidate Oregon Spotted Frog?

96) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Endangered Loggerhead Sea Turtle?

97) How will a rail oil spill response plan for the Eastern Washington ensure the protection of the State Candidate Sagebrush Lizard?

98) How will a rail oil spill response plan for the Eastern Washington ensure the protection of the State Endangered Northern Leopard Frog?

99) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Cascade Torrent Salamander?

100) How will a rail oil spill response plan for the Eastern Washington ensure the protection of the State Candidate Columbia Spotted Frog?

101) How will a rail oil spill response plan for all of Washington State ensure the protection of the State Candidate Western Toad?

102) How will a rail oil spill response plan for Southwestern Washington State ensure the protection of the State Candidate Dunn's Salamander?

103) How will a rail oil spill response plan for Southwestern Washington State ensure the protection of the State Candidate Van Dyke's Salamander?

104) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Threatened Green Sea Turtle?

105) How will an oil spill response plan for the terminal areas, Grays Harbor and the coast of Washington ensure the protection of the Federally Endangered Leatherback Sea Turtle?

Specific Areas of Concern Insects:

106) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Columbia Clubtail?

107) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Columbia River Tiger Beetle?

108) How will a rail oil spill response plan for the Columbia River ensure the protection of the Federally Endangered Taylor's Checkerspot?

109) How will a rail oil spill response plan for Thurston County and Eastern Washington State ensure the protection of the State Endangered and Federal Species of Concern Mardon Skipper?

110) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Juniper Haristreak?

111) How will a rail oil spill response plan for Eastern Washington State ensure the protection of the State Candidate Silver-bordered bog fritillary?

112) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Chinquapin Hairstreak?

113) How will a rail oil spill response plan for Southwestern Washington State ensure the protection of the State Candidate Valley Silverspot?

114) How will a rail oil spill response plan for Grays Harbor County Washington ensure the protection of the State Candidate Puget Blue?

115) How will a rail oil spill response plan for Grays Harbor County Washington ensure the protection of the State Candidate and Federal Species of Concern Queen Charlotte's Copper?

116) How will a rail oil spill response plan for Grays Harbor County and Southwestern Washington State ensure the protection of the State Candidate Johnson's Hairstreak?

117) How will a rail oil spill response plan for the Columbia River ensure the protection of the State Candidate Pacific Clubtail?

Specific Areas of Concern Other Species:

118) How will a rail oil spill response plan for Eastern Washington State ensure the protection of the State Candidate Giant Palouse Earthworm?

119) How will a rail oil spill response plan for Thurston County Washington ensure the protection of the Leschi's Millipede?

Response GP238-18

As noted in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, an oil spill contingency plan is not required prior to operations and has not been developed. However, once a plan has been submitted to Ecology as required by WAC 173-186, it will be available for public review and comment for a period of 30 days. Refer to the Master Response for the Purpose and Focus of the EIS.

Comment GP238-19

Specific Areas of Concern Global:

The projects are expected to increases CO2 by more than 15,000 metric pounds a year. Reports show that pH is decreasing to critical levels in the Pacific Ocean. Increases in CO2 are directly linked to this problem. Question;

120) Oyster spat are dying by the millions in Willapa Bay due to lower pH and oyster growers are increasingly desperate to get oyster to grow. How can there be justification to contribute to this problem by increasing CO2 with the proposed terminals?

Response GP238-19

Refer to the Master Response for Purpose and Focus of the EIS.

Comment GP238-20

<u>Chapter 3.8 Noise and Vibration</u>

The projects will increase noise in the area of the projects. What about the impacts to homes near the project? Noise from facility operations is expected to be similar to the existing levels at the port. What are the existing levels of noises at the port?

Studies found the increased number of trains could increase noise, mainly from train horns at road crossings. These horns are for safety to let cars and people know the trains are approaching. Homes near the rail line between Satsop and Elma and in Central Park, Malone Porter and Centralia could be most affected, and the average noise increases in these areas could be substantial. What is substantial? The studies recommend creating Quiet Zones to reduce noise, but impacts could remain. What are Quiet Zones?

Please explain how the only viable mitigation for the noise and vibration of the 7.65 and 1.25-mile-long trains per day is to trade off the increased risk of vehicle crossing accidents for reduced use of locomotive horn soundings!

Where is the information on noise and vibration impacts to Elma, Centralia, Montesano, and Junction City? We would like to get an in-depth understanding of the effects of noise and vibrations on home values in the communities associated with the increases in train traffic. Where is that information? Where is the analysis?

Response GP238-20

Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*, provides an analysis of noise and vibration impacts related to the proposed action that would occur in the study area, including Elma, Centralia, Montesano, and Junction City. Noise monitoring conducted for the proposed action is summarized in Appendix G, *Noise Data*. Quiet zones are described in Section 3.7. To qualify for implementation, grade-crossing quiet zones must undergo a feasibility study and safety risk assessment, and be approved by the Federal Railroad Administration in cooperation with all applicable jurisdictions.

Comment GP238-21

<u>Chapter 3.14 Hazardous Materials</u>

First responder delays will be statewide. How can first responders effectively respond to an explosive rail train accident? What will the response time be if an accident occurs along a deserted part of the track from Elma to Hoquiam? How many first responders are available? What is the work schedule for local police and fire to respond to an oil spill and /or explosive fire?

Response GP238-21

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP238-22

What is the secondary containment common to all tanks at the terminal? Can fire from a leak in one tank weaken other tanks sitting in the same pool, causing the oil to exceed capacity of secondary containment?

October 1, DOT implement stricter safety standards for America's crude-oil transporting railcars—however, the CPC-1232 cars were introduced by the rail industry in 2011 as an upgrade to older models and were built with thicker shells and pressure-relief devices. According to the Association of American Railroads (AAR), roughly 60,000 CPC-1232 tank cars are operating across North America, in addition to 100,000 of the older models.

"These new type of cars were supposed to be safer, but it's obvious these cars are not good enough or safe enough," said Claude Gravelle, a Canadian lawmaker who represents a northern Ontario area where two recent derailments occurred. The Wall Street Journal reports that one of the derailments occurred on Saturday near Gogama, Ontario, and by Monday, emergency workers were still trying to extinguish fires from the ninety-four car Canadian National Railway Co. train. Even with new tank cars explosions and fires still occur. How can there be any justification for allowing trains to carry crude by rail through Grays Harbor County and to the Port of Grays Harbor. How are you going to mitigate this concern? What type of rail cars will be required on the rail line through Grays Harbor?

Response GP238-22

Facility design standards required by state and federal law are described in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, and are intended to minimize the risks of the spread of crude oil and the likelihood of fires or explosions. Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and the retrofitting of all existing tank cars in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643). However, as noted in Section 4.5.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport*? the risks cannot be eliminated.

Comment GP238-23

Chapter 3.15 Rail Traffic

Your Draft Environmental Impact Statement glosses over the impacts, particularly in the extended rail study area. In addition, each of our communities have names how will each of our named communities be affected by oil trains going through or by their city limits. Be specific, what is the chance of property damage, of loss of life or of oil spills and explosions to each individual community. The probability of this happening in any one town on any one day may be "low" as you say, but in 20 years, significant property damage, loss of life, burns and oil in the river is almost guaranteed to happen and will be unavoidable.

We disagree with your use of the word "low" in this statement. What does "low" look like in terms of loss of life, property, or oil in a river. Either replace the word "low" with the word "high" or ask your consultants to do the math for the entire route.

Response GP238-23

Comment acknowledged.

Comment GP238-24

3.15.4.5 Ongoing Maintenance and Inspections

Made various bridge repairs at MPs 2.34, 12.64, 38.8, 46.9, 52.43, 63.93, and 68.64. What are the repairs?

Response GP238-24

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP238-25

Table 3.15-4. Current Rail Traffic by Commodity along the PS&P Rail Line

Commodity: Auto
Status by Direction: Full Empty
Typical Trips
Daily: 0.5
Weekly: 3.8
Annually: 197
Typical Number of Cars: 65

Commodity: Grain
Status by Direction: Full Empty
Typical Trips
Daily: 0.6
Weekly: 4.0
Annually: 206
Typical Number of Cars: 101

Commodity: Mixed carload freight
Status by Direction: Varies Varies
Typical Trips
Daily: 2.1
Weekly: 15.0

Annually: 780
Typical Number of Cars: 50

Commodity: Between Centralia and
Status by Direction: Varies Varies
Typical Trips
Daily: 1.6
Weekly: 11.5
Annually: 598
Typical Number of Cars: 50

Commodity: Between Centralia and Elma
Status by Direction: Varies Varies
Typical Trips
Daily: 0.3
Weekly: 2.4
Annually: 124
Typical Number of Cars: 50

Commodity: Between Elma and Aberdeen
Status by Direction: Varies Varies
Typical Trips
Daily: 0.2
Weekly: 1.1
Annually: 58
Typical Number of Cars: 50

Commodity: Garbaged
Status by Direction: Empty Full
Typical Trips
Daily: 0.1
Weekly: 1.0
Annually: 52
Typical Number of Cars: 98

Total
Typical Trips
Daily: 3.1c
Weekly: 23.8
Annually: 1,235

3.0d

According to the DEIS the PS&P rail line would not need to expand for these proposals. The Westway and Imperium projects together would add about 3.25 train trips (full and empty) a day to the 3 train trips a day that happen now. The studies found the PS&P rail line can accommodate up to 12 trips per day with its existing infrastructure, so no additional construction is needed. What studies? In addition, U.S. Development is also interested in developing a terminal in Grays Harbor what would be the total including their proposed facility?

The Westway and Imperium projects together would add about 3.25 train trips (full and empty) a day to the 3 train trips a day that happen now. The studies found the PS&P rail line can accommodate up to 12 trips per day with its existing infrastructure, so no additional construction is needed. What study? We need to review the research to better understand the conclusions.

Response GP238-25

The detailed analysis of rail capacity is presented in Draft EIS Appendix K, *Rail Traffic Technical Information*.

Comment GP238-26

What do these projects mean for traffic at Olympic Gateway Plaza?

The studies found the increase in train traffic could increase the average daily time that street crossings are blocked. The wait times are expected to be worst during rush hour. The current amount of time that the railroad crossings in the Olympic Gateway Plaza area are blocked on an average day ranges from 49 to 70 minutes in a 24 hour period. This range could increase to 96 to 112 minutes per day for the Westway project, and 108 to 138 minutes for the Imperium project. That's---around 4 hours a day for these projects plus the existing rail traffic. With U.S. Development also in the mix, bossiness will be severely impacted by the increase in rail traffic.

Because project trains are longer than current trains in the area, the proposed projects could increase the amount of time that all crossings into and out of the Olympic Gateway Plaza and Port of Grays Harbor areas are blocked. Trains currently occupy all crossings in the Olympic Gateway Plaza area for about 35 minutes four times per week. With the projects, this could increase to 45 minutes each time and happen four more times a week for Westway and seven more times a week for Imperium. In the Port area, trains currently occupy crossings up to 13 minutes at a time. With the projects, this could increase up to 22 minutes for 22 minutes for Westway and 77 minutes for Imperium. The studies recommend the companies work with agencies responsible for traffic to find ways to reduce the possible impacts. If the impacts cannot be reduced, they will be identified as unavoidable and significant impacts in the final EISs. Will this finding stop the permitting of the terminals?

You computed the probability of harm for the last 59 miles of the route and we want you to compute that probability for the entire route. A million people who live, work, and drive near the tracks are at risk. Having 2 drunk drivers on the road doesn't mean it is OK to have three.

"Although the likelihood of a large spill, fire, or explosion is low, the potential for significant adverse impacts on the environment and human health in the case of such an incident is high." What is high—what is the loss of life look like?

Using the FRA rate of 0.8 non-yard accidents per million miles, we conclude there will be 22 non-yard accidents involving full oil trains and 22 more involving empty oil train in twenty years for the combined Westway and Imperium proposals. Is that acceptable to the Department of Ecology and the City of Hoquiam?

Response GP238-26

Refer to the Master Response for Purpose and Focus of the EIS.

Comment GP238-27

In your EIS please describe how oil trains will affects the health safety and welfare of other communities including members of the Columbia River Inter-Tribal Fish Commission, the Washougal School District and the Federally protected National Scenic Columbia River Gorge and Recreation Area.

Response GP238-27

Refer to the Master Response for Geographic Scope of the EIS.

Comment GP238-28

You assume that **historical risk assessment for crude oil applies to Bakken Crude.** You wrote "Long-term historical data may show that most spills do not result in fires or explosions" . . . but . . . the oil being transported now is much more prone to ignite. There have been 14 spills resulting from derailments since 2013, and all but two of them have ignited. You need to reexamine your analysis. What is the real risk of an explosion or fire associated with Bakken Crude?

You assume that if one tank car spills from a derailment, the subsequent fire does not cause other tank cars to spill. Derailments and explosions over the last 3 years do not support that assumption. What is the likelihood of an explosive event when Bakken Crude rail cars derail? We would like that analysis to only include the last 5 year period.

You assume empty tank car derailments do not cause fire, but the fire chief in Ellensburg says otherwise. Why is there a concern by the fire chief in Ellensburg?

Railroad's calculated Worst Case Scenarios for a potential crude oil train emergency in urban and sensitive environmental locales. What is the potential impact of a crude oil disaster in Washington communities? What is the potential impact of a crude oil disaster in Grays Harbor?

What is the evidence of the levels of catastrophic insurance coverage railroads and Westway and Imperium has purchased relevant for potential serious releases in Washington State and Grays Harbor? For what level of potential disaster is your railroad covered?

There are high hazard flammable train Comprehensive Emergency Response Plans, both generic and for specific locations in Washington, urban and rural. Is there any credible emergency response to crude oil train disasters except evacuation? Please provide such plans covering all counties with crude train routes.

Route analysis documentation and route selection results for Washington State., pursuant to 2007 Public Law 110-53 on urban hazmat safety and security routing, with the currently covered cargoes, especially chlorine and ammonia, as well as for the newly-recognized "key trains" of crude oil and ethanol. How have you weighted the 27 federal routing factors and whatever interchange agreements your railroad has struck with others to avoid high-risk areas?

You assume sparks are **almost absent** at 25 mph. What does almost absent mean? You assume the impacts to property values of an oil train, is the same as the impacts to property value of a general freight train. Where does that information come from? Cite the source!

You assume spills can be cleaned up, but according to the Marine and Rail Transportation Study, at best only 14% of the oil is recovered in a spill. How are you going to improve on that percentage?

You assume tank car caps are on tight and there are no vapor releases during transport, but Oregon State Rail Inspector reports hearing hissing and observer's have witness vapors escaping tank cars. Can you prove that there are no vapors linking from rail cars?

You say "Heavier oils . . . do not generate many flammable vapors", but the oil train fires in Timmens and Gogama Ontario in winter involved Tar Sands Crude. Where is the proof that heaver oils do not explode?

In the event of an accident, you assume the responsible parties will be able to pay for damages and do so in a timely manner. Why do you assume this?

You assume the vapor combustion units are reliable, but they have been known to fail. You assume that better control technology does not exist. If you assume combustion, units are the most reliable and they can fail —what is the rationale for your statement?

1. What are the speeds above which tank cars can rupture?

2. Why have there been rail inspection failures?

3. Why have there been equipment inspection failures?

4. Why are there concerns about crew size on trains?

5. Are there concerns about the human element, fatigue, long hours?

6. What are the lessons learned from the recent whistleblower victory in court.

7. What is the cost of providing adequate staff, and equipment for emergency preparedness for Grays Harbor?

8. America's largest landslide area, in the Columbia River Gorge.

9. The speed of the train that spilled into the James river was 24 mph

10. There have been four ruptures of the newer safer CPC 1232s in the last yaer—why is this a concern for Grays Harbor?

11. Why is there a need for 25 mph speed limit on the PS&P line from Centralia to Aberdeen?

Response GP238-28

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, has been revised to include a discussion of the unique considerations specific to Bakken crude oil with respect to emergency response and cleanup activities, including factors related to its relatively higher potential for flammability.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Final EIS Chapter 5, *Extended Rail and Vessel Transport*, further describes the potential risks associated with rail transport in this area.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values and includes a discussion of the range of impacts that could be anticipated based on studies cited in that section.

Rail operators are required to adhere to all applicable regulatory requirements intended to ensure the safe passage of freight.

Draft EIS Chapter 3, Section 3.2, *Air*, addresses potential impacts from routine operations. Emissions of onsite stationary sources, including the marine vapor combustion, are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and applicant mitigation that would reduce potential impacts on air quality.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP238-29

Chapter 3.16 Vehicle Traffic and Safety

Where are the statewide traffic impacts?

Where is there reference to school bus delays statewide?

Response GP238-29

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP238-30

Chapter 3.17 Vessel Traffic

If both projects are approved, Terminal 1 would be occupied up to 363 days per year. This would exceed the maximum capacity of the dock, considering needed time off for maintenance, but is based

on the assumption that the greatest number of vessels would be used for each project. How will this be mitigated?

Response GP238-30

The Draft EIS does not specify exact combinations of vessel types to ensure berth capacity is not exceeded.

Comment GP238-31

Based on the combined traffic for the proposed projects and future vessels, **the studies found there would not be a substantial impact on the navigation channel traffic.** The increase in vessels from the proposed projects **would not** affect the movement of other large commercial vessel traffic in Grays Harbor. You have got to be kidding! How can this be possible? Ships and barges will be using the harbor every day of the year—in good weather and bad. Near the entrance into the Grays Harbor estuary from the Pacific Ocean, less buoyant saltwater (from the ocean) flows beneath more buoyant freshwater (from the numerous rivers and streams that drain into Grays Harbor). During ebb tide, bouyant freshwater at the ocean/estuary innerface expands. Coupled with high winds brought on by severe winter storms, wave conditions near the entrance to Grays Harbor can be intense *(Grays Harbor Geographic Response Plan December 2013).*

The Grays Harbor Bar can be closed for days to weeks!

Response GP238-31

Refer to Draft EIS Chapter 3, Section 3.17.5.2, *Proposed Action*, for the channel capacity analysis. Section 3.17.3.2, *Impact Analysis,* describes the methods used in the analysis.

Comment GP238-32

In addition, the navigation of Grays Harbor can be difficult! Due to shoals and flats, the navigable channel into Grays Harbor narrows to 0.6 miles wide with a number of turns where well judged course changes are required. A breaking bar at the entrance to Grays Harbor, coupled with strong and sometimes erratic currents, can present a navigational challenge to commercial and recreational vessels entering or leaving port. Periods of limited visibility (fog, rain, and darkness) can add to this challenge. Submerged sections of the north and south jetties at the Grays Harbor entrance extend seaward about 0.2 and 0.9 miles (respectively). Hazardous breakers can occasionally be present near these jetties, especially during periods of heavy weather.

Response GP238-32

Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*, discusses the systems that are in place to manage vessel traffic in Grays Harbor safely. Chapter 4, Section 4.6, *Environmental Health Risks—Vessel Transport*, presents an analysis of potential impacts from increased risk of vessel collisions, groundings, and allisions and related consequences (e.g., release of crude oil) under the proposed action, and proposes mitigation measures to reduce the likelihood of a vessel incident.

Comment GP238-33

Pilotage rules for commercial traffic must be followed in order to reduce the risk of groundings, collisions, or other accidents (Grays Harbor Geographic Response Plan December 2013). When conditions deteriorate, vessels may not be able to enter port due to a bar closure. Should a vessel experience a casualty, tug assistance from nearby coastal ports may be unavailable due to conditions on the bar. Brief windows of improved weather may cause waiting vessel traffic to get under way to cross the bar, potentially leading to heavier than usual vessel traffic during marginal conditions around harbor entrances.

Response GP238-33

The pilotage rules contained in WAC 363-116 are in effect for the Grays Harbor pilotage district (state rules) and enforced by the Board of Pilotage Commissioners. Federal pilot requirements for proposed action vessels are contained in 46 CFR 15.812 and are enforced by the U.S. Coast Guard. Refer to Draft EIS Chapter 3, Section 3.17.4.2, *Large Commercial Vessels*, for a discussion of escort tug use in Grays Harbor as related to the proposed action vessels. As noted in Section 3.17, *Vessel Traffic*, pilot and escort tug capacity would not be exceeded because of proposed action vessel operations. Refer to Section 3.17.4.4, *Vessel Traffic Management*, for information about how vessel movements are managed in Grays Harbor.

Comment GP238-34

Who bears responsibility for damage when a tanker runs aground or a collision occurs? How will this be mitigated?

Response GP238-34

Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP238-35

Chapter 7 Economics, Social Policy and Cost Benefit Analysis

Who pays for site-cleanup in the event of a bankruptcy?

Response GP238-35

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Comment GP238-36

You assume that oil production in Alaska and from OPEC might decline in amounts equivalent to the amounts proposed for Grays Harbor. We have no guarantees of that and OPEC appears unwilling to give up market share.

We have no hope of stopping climate change if we continue to build new fossil fuel infrastructure. We need to transition away from fossil fuels, not strengthen our dependence on them. Once a facility is built, investors such as pension funds will demand a return on investment for the rest of the century.

We are in an oil glut. You ignore the impact that increased supply of oil will have on consumer interest in fuel efficient cars. You suggest that maybe production in North Dakota might replace production from OPEC or Alaska, but there are no guarantees of that.

Response GP238-36

Comment acknowledged.

Comment GP238-37

In your economic summary, you make a chart of economic benefits and costs assuming there would be NO job losses and no accidents, you did not include the harm to jobs in the fishing industry. You didn't include the decay that will set in, as businesses and people move away.

Statewide economic impacts

Adequacy of Financial Responsibility

The Economic Impact Analysis Planning model used by ECONorthwest in relation to the fact that oil trains are prone to catch fire.

Where is the minimal analysis of the cost of a small spill in Grays Harbor, a moderate spill in Grays Harbor, a large spill in Grays Harbor?

If you can analyze the positive impacts to the Grays Harbor economy—why can you not analyze the potential negative impacts?

Response GP238-37

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis.*

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

GP239, **Figlar-Barnes, Ron**

Comment GP239-1

My name is Ron Figlan-Barnes, resident of Elma. And thank you for this opportunity to, you know, give testimony on these two projects again.

I've got all this written here, you know, WAC 197-11, WAC 560. Lead Agency, what the agency must do. I have all this stuff, you know, saying what -- how lousy the, you know the DEIS really is because it misleads. I don't want -- and then you have two minutes to be able to say anything, you know.

Brian Shay, this is like the third or fourth time that I've talked while you've listened. Still the permit process continues. This is not a good situation for Grays Harbor. You need to pull the permits, period. And you have all these good folks giving you all the reasons why. If you can't see that, then I feel sorry for you.

Response GP239-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP240, **Finke, Jeanne**

Comment GP240-1

I care about the economic impacts on Grays Harbor. The DEIS seems to value only the economic benefits from the terminals, including a small number of jobs and annual taxes. The DEIS fails to adequately analyze the harms and negative impacts of these terminals, not only if there is an accident, but impacts on other proposed developments, the marine resources economy, tourism, and property values.

Response GP240-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4, *What are the costs of the proposed action?* describes the range of associated costs that could be expected in general terms, including impacts on affected businesses and property owners. Final EIS Section 7.3.4.2, *Potential Impacts on Property Values,* has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP240-2

I live in Ocean Shores, WA right on the North Bay shore so I can visualize clearly the devastating impact of oil spillage on oystering operations, seining off Damon Point, the Bay itself which is the

Pacific flyway resting site for bird migrations who gather here, razor clamming on our ocean beaches, surf fishing, and the attraction of our beach areas to tourist to enjoy, and the livability and value of my own home as it sits on this waterfront view property. I care about the respiratory and neurological health impacts for all the people in the communities along the rail lines from beginning of the rail route as it enters the state of Washington, following the Columbia River Gorge to Vancouver, then north to Centralia/Chehalis, then west along the Chehalis River to the terminals in Hoquiam.

Response GP240-2

Comment acknowledged.

Comment GP240-3

The increase in these rail car shipments and hence the increase in diesel emissions will increase the pollution of the fresh air here that we of all ages seek to enjoy. Diesel emissions have been identified and linked by the WSMA to increase in asthsma and increase in neurological disorders in children. My mother, Dorothy H. Kullberg, President of Portland Transit Savers organization, fought in the 1950's against diesel bus service replacing electric trolley rail service in Clackamas County. That battle was lost to more powerful interests, but over 50 years later, the MAXX electric rail trains now have emerged to serve the airport and several areas in the greater Portland area and Clackamas County. Oregonians finally awoke to take environmental actions to work to preserve the livability of their state. We can do that too in Grays Harbor and all along the rail line! The Department of Ecology and Hoquiam should fill the gaps and inadequacies in the DEIS analysis. The analysis and findings of significant environmental impacts that cannot be mitigated in the DEIS should be used to reject these proposed oil shipping terminals.

Response GP240-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP241, **Finke, Jeanne**

Comment GP241-1

I would like the DOE to identify the risk taking entitites associated with these projects,as well as the order of precedence in ownership of responsibility for risk mitigation and risk acceptance. (For example, based on what I have just read about the Fry Creek mineral oil spill November 16, 2015, the Grays Harbor PUD was first to respond then the DOE was secondary. It appears the DOE will determine the fault and ask for compensation from the offender, e.g., the PUD or the railroad company for the train that hit the transformer.) Potential Oil spills and oil train fires are the biggest risks for the Westway and Imperium projects. If the commercial companies involved in the transportation and storage and shipping process are not financially capable of assuming the risks associated with these projects, the tax payers will end up owning the costs which would include litigation. The costs that cannot be recouped could end up bankrupting the small towns or counties along the railroad lines and the seafood and tourism industries. If the state and the federal government are willing to accept these financial risks, we all will be paying the bill for the damage.

Response GP241-1

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

GP242, **Fjachie, Craig**

Comment GP242-1

Grays Harbor is a unique and vital natural resource and key estuary in our marine ecology. A terminal to export oil in Grays Harbor is immoral and extremely short-sided, given the urgent need to reduce, not expand consumption of fossil fuels.

Response GP242-1

Comment acknowledged.

GP243, **Ford, Robert**

Comment GP243-1

Specific Item Which Should Be Considered In More Significant Depth Within The Draft Environmental Impact Statement Presented For Public Comment Oct. 8, 2015:

Presented for consideration by Robert M. Ford, III, FAIA,

Architecture/Planning (Northwest)

1335 E. First Street

Aberdeen, WA 98520

DANGER OF LANDSLIDES OVER TRACKS INTO CHEHALIS RIVER

This year, in January 2015, Hoquium and Aberdeen experienced significant rainfall within a relatively small period of time. Many people awoke to water standing on their city streets. In fact at 6am the standing water at my house on the East end of First Street, near the Wishkah River, was over 8” deep. As daylight broke, I walked along my street in ankle deep standing water. On close examination I realized many neighboring houses actually had water up to or above their door sills. And it was still raining. I parked my little car in my neighbors driveway to get it above the standing water.

Later that morning, as I was watching the water very slowly subside, a neighbor asked if I had heard about several houses sliding down a hill over near the hospital? And about that time I heard a cracking sound as five mature trees across the Wishkah River slid down the hill into the river! They are still there as a bit of a hazard to fishermen and their boats. No one accepted responsibility. An act of God?

Response GP243-1

Comment acknowledged.

Comment GP243-2

On January 5th I had to drive into Olympia, but was faced with large D.O.T. trucks and heavy equipment attempting to open up Highway 12. Seems a major hillside slide had engulfed all four lanes of the highway, and in fact toppled the guard rail with earth then falling down over the next lower hill, across the railroad track and into the Chehalis River!!!!!

What if 20 0r 30 rail cars of Baaken Crude had been traveling through on its way to those proposed tanks in Hoquium??? "So long" to Grays Harbor fisheries, clams, oysters, crabbing. The flowing river and ebb-tide would quickly carry the oil out to West Port ..... in several hours. No time for response!

This week I read a clear article by correspondent Kyle Mittan of the Daily World. He had researched that slide area thru the Department of Transportation (article attached) Seems that particulars spot is still sliding on occasion. They have attempted to install drain pipes all the way up the hill to the ridge and they must monitor the slide area each day!! And in fact that bluff has experienced eight slides since 1994!!! The "worst slide to date was in 1996, resulting in closure of all four lanes for several days." (see full Daily World article attached)

If this or similar slide area were to hit a Crude Oil Train we might no longer talk of the threat of bringing crude oil thru our cities. We would simply look for a new place to live. The only rational answer is to say NO TO CRUDE OIL!!!!

Response GP243-2

Based on the recent landslide occurrences that exceeded the predicted landslide flow distance, Final EIS Chapter 3, Section 3.1, *Earth*, acknowledges the distance that debris flow has traveled in the past. Despite the recent landslide events that exceeded the predicted landslide flow distances, the rail and road segments for 12 of the 19 miles described are estimated to have the same level of risk for interruption by landslides as previously described in the Draft EIS.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP244, **Ford, Robert**

Comment GP244-1

My name is Robert Ford, architect planner, living at the end of First Street near the Wishkah River. I'd like to talk about landslides. In January we had 11 inches of rain. I woke up one morning and there was eight inches of water in my street, a lot of water all over town, and in a lot of houses.

A neighbor of mine said, Have you heard about the houses that slipped off the hill over in Hoquiam? They're still there at the bottom of the hill. I looked around me and I heard a cracking noise and there were five trees cross the river from me that came down the side of that hill into the Wishkah River. The trees are still there. Nobody bothered to get them out of there.

The next day I went into Olympia down Highway 12 -- or up over Highway 12 and there had been a landslide. I didn't realize that. I couldn't get through. They were moving dirt. The landslide came down, hit Highway 12, knocked out the guardrail, gone over the hill, gone down over the railroad tracks and touched the river.

What if that had been that Bakken crude oil train? It would have been in the river. The contents, because of the ebbing tide and the flowing river, would quickly be down to Westport. There's no time for response. There's no way to mitigate that kind of a problem. I urge you to vote no, please.

Response GP244-1

As stated in Draft EIS Chapter 3, Section 3.1.5.2, *Proposed Action*, *Rail*, the potential for landslides along the rail line would be the same under the proposed action as the no-action alternative; however, increased rail traffic related to the proposed action would slightly increase the likelihood of a landslide affecting a train along the PS&P rail line. Draft EIS Chapter 4, Sections 4.5, *Environmental Health Risks—Rail Transport*, presents the analysis of risk of oil spills, fires, and explosions along the PS&P rail line under the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures. Nonetheless, implementation of these measures would not completely eliminate the possibility of an incident. Depending on the specific circumstances of an incident, the environmental impacts could be significant.

Refer to the Master Response for Purpose and Focus of the EIS.

GP245, **Forster, Charles**

Comment GP245-1

I urge a refusal of ANY oil-train terminal on Washington's coast. We all know (from more examples than can be listed in 4000 characters) that where-ever oil is shipped by pipeline or rail or freighter eventually there will be a large spill. our coastline and the ocean fauna is already under threat from warming ocean waters. Please, let us use common sense and deny any effort to further threaten our coast and ocean waters.

Response GP245-1

Comment acknowledged.

GP246, **Francy, Joshua**

Comment GP246-1

I have a few concerns about companies shipping oil through grays harbor and transferring it to boat to transport it overseas. There are a number of reasons why this is not a good plan. They are the condition of the railways, the usual weather in the harbor, and the risk of a spill.

I have lived in this area for over a quarter century. I have enjoyed living in this area with its various biomes. This area has many rivers that join together to form the waters of Grays Harbor. Close to this area we have the temperate rainforest, beaches, lakes, hills, and forests. Our local economy fell apart after the timber industry lost its profit margin. Our local shorelines provide the areas to farm cranberries, oysters, and clams. We have a very unique environment that would be destroyed if these companies are allowed to ship oil through this area. We have a rainforest close to where we live so we have more rain than else were.

Our harbor usually has high winds that causes conditions that would prevent the oil from being contained when it spills. Booms will not function correctly. I have seen it with my own eyes.

Response GP246-1

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP246-2

I have seen a number of train wrecks here. I live close to the tracks. I have seen the damage caused by four train wrecks over the past few years. I also see the space that is used to store full biodiesel tankers in Aberdeen does not have a fence and is not monitored for long periods of time. I am attaching some pictures of two different wrecks. One was caused by antiquated and faulty equipment and the other was caused by the rail road company transporting something too large that snagged a fiber optics cable and knocked a transformer and mineral oil into a local creek. The first collage of pictures should show railroad tracks & a track switch covered by rain. The railroad company stated that the switch being covered with water shorted it out and caused it to send the train down tracks that don't exist anymore. It happened during the end of April in 2014. That caused two railcars to wreck and spill grain onto the ground. The grain and railcars were left next to the railroads for over a month. The grain was there so long it molded. The second set of pictures is more recent. This happened only a few weeks ago. The story I was told was that the train over hauling something oversized and that snagged a fiber optics cable and power transformer. The transformer had mineral oil in it and that spilt into a local creek. I came across the scene two days after the accident. The booms were placed on both sides of the last culvert before the creek enters Grays Harbor. Those booms were tangled due to the tide. Both times I went to the site it was unmonitored. I called spill response after I came across the site. The booms were floating at high tide the next day, but was still unmonitored. Both of these incidents showcase how train wrecks affect the local area.

If these corporations are allowed to ship crude oil through this area it will destroy our local livelihood and only a small amount of people will benefit while the rest of our safety is risked.

See original attachment for photos [Photos reviewed but not reproduced.]

Response GP246-2

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures

with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

GP247, **Franklin, Teri**

Comment GP247-1

Good evening. My name is Teri Franklin. I'm from Grays Harbor. I'm third generation.

I'm three quarters of the way through reading your EIS. My background is watershed analysis. I find it willfully inadequate. I've been involved in projects here with the Land -- Shadle Space and Land Trust, the Shadle Space and Partnership, Thurston County Conservation, Lewis County Conservation. We've spent hundreds of millions, and I mean hundreds of millions of dollars cleaning up our fish runs, doing all kinds of work and restoration, and this is like a slap in the face for all those volunteer hours, all that time, all that energy to put something like this in the mouth of the Chehalis River. It's craziness.

There's no mitigating any of this. If it spills over there's -- it's never -- our fisheries are going to be gone. All that work, all those years. I've been at this since 1992. That's a lot of volunteer hours. This is craziness. Absolute craziness.

These are the most hokey documents I've seen in a long time. And you will be getting my written testimony because I can't even begin to tell you how crazy it is in two minutes. So I really hope that you will look at this and look at all the money, time, and energy that we have spent cleaning the mess up here. And take a look at this building, because this is the last major debacle you guys let through here.

So, please, think twice about, you know, what you're up to. Thank you.

Response GP247-1

Comment acknowledged.

GP248, **Franklin, Teri J.**

Comment GP248-1

November 28, 2015

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To all agencies that will use this information to determine if permitting will be allowed please read carefully, it is not that long and is a summary of events that were undertaken to protect the natural resources of this area. All information pertaining to my statement can be found on the internet at the Federal, State and Local government agency level, you should have better access and an easier time then I did obtaining all the information concerning costs. If you track the money spent you will be surprised.

It appears to me that you have totally ignored the Chehalis Basin Partnership Management plan by entertaining the thought of the projects being proposed for Westway, Imperium and US Development. You are also ignoring the entire chapter of RCW 77.85. I find this totally unacceptable.

In the past 17 years we have spent over $137.4 million dollars, of taxpayer's money cleaning up the water quality, restoring as much habitat as we could afford and doing restoration projects on the Chehalis and its tributaries, all for the preservation of the salmon. It will take years for the results of these efforts to be realized. Allowing these storage tank projects to go on is ludicrous, I am so tired of government officials with a single stroke of a pen undermining the hard work of all the people who have volunteered their time, energy and money to make this a reality.

The people of Grays Harbor allowed Westway Terminal Company LLC into Grays Harbor without opposition because they were going to do bio-diesel which we saw as a better alternative technology to fossil fuels. There are a great many progressive thinkers in Grays Harbor County. Our quality of life and our natural resources are extremely important to help secure our vision for a sustainable community using our natural resources and attempting to add the benefit of a more eco-tourist type economy into the mix.

We find Westway's attempting to change over to some of the worst crude oil this planet has seen humans extract, a huge slap in the face to all of us.

What our Port Officials are promoting is not the general consensus of the people of this area. It is also contrary to what the Port of Grays Harbor signed on for by signing up with the Chehalis Basin Partnership. Their lack of vision as to the risks they are taking to secure 20-40 permanent jobs while putting 1000's of natural resource jobs at risk is appalling.

The added rail traffic and the long trains will disrupt all who use the roads in this area since we have 100's of crossings and maybe three over road trestles. There are no trestles or underpasses for emergency services for Elma, Montesano, Aberdeen or Hoquiam to gain access to portions of their individual communities and the cost to build them is prohibitive for the people of this area.

Response GP248-1

Comment acknowledged.

Comment GP248-2

The added crude rail traffic will require some serious attention to the area's along the rail that cross all the culverts, wetlands and streams. The increase in rail traffic of these 1 ¼ mile long trains will vibrate the ground causing erosion issues that could derail a train. I have notice in the last mouth there are areas in Grays Harbor where the speed of trains has been increased recently that are now causing the rails to become wavy. The trains may need to travel at lower speeds which would than cause more congestion. I do not see anything in the DEIS that truly makes any changes that will relieve these problems.

Response GP248-2

As noted in Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*, implementation of the proposed action is not expected to result in changes in speeds and therefore, no changes in vibration or speed-related increased in congestion along the PS&P rail line.

Comment GP248-3

There are marble murrelet nesting sites in WRIA 22 and they do use the Chehalis. The vessel and rail route include many environmentally sensitive areas including streams, rivers, wetlands, fishing areas, shellfish beds, migratory bird habitat and a national wildlife refuge. This is our natural resources that we are trying to keep intact and this proposal does not do that. Federal Law through the endangered species act requires us to protect the fisheries of this area and no amount of spill prevention preparedness is going to do that. This proposal does not fit with this area. My state representatives gave a town hall meeting in the Elma area and told us that we have the best spill response teams around. I was told that they see the tankers going to and from the Strait of Juan de Fuca on a daily basis. Well you tell me how many intact salmon runs are left in Puget Sound. Not that many, imagine that. We have taken steps here in the Chehalis Basin to preserve what we have and to enhance what we can, to protect this resource as required by law. These types of proposals undermine that work. No mitigation is going to be able to protect the investment, either monetarily or physically, we have made in our natural resources which are highly valued by the people of the Chehalis Basin. Our commitment to the long term planning for this area proves this. These permits should be denied and this type of industry should never be considered for Grays Harbor again we have invested too much time and money to have it undermined by proposals such as these. We have taken steps to stop any future thought of oil storage in Grays Harbor through the political process putting ordinances in place that will make this impossible in the future and due to the sensitive nature of Grays Harbor we are asking that these permits be denied. As evidence to what I am stating I give you the following:

The Chehalis Basin Partnership was formally created through an intergovernmental agreement dated August 31, 1998; however, the group formed and began meeting in the fall of 1996 in response to water resource issues that had emerged in the Chehalis Basin. In 1998 the Partnership took advantage of the legislative enactment of the Watershed Management Act (Engrossed Substitute House Bill 2514, Revised Code of Washington 90.82), to begin a voluntary planning process for the Chehalis Basin. The Chehalis Basin includes two state-designated Water Resource Inventory Areas or WRIAs: the Lower Chehalis Basin (WRIA 22) and the Upper Chehalis Basin (WRIA 23). Together, they comprise one of the largest watersheds in Western Washington.

The state-authorized watershed planning process allows local governments and interested groups and citizens to assess and manage the water resources of a river basin and to develop strategies within the basin to address water quantity, water quality, fish habitat and in-stream flows. Watershed planning is intended to support economic growth and promote water availability and quality for the state.

Between 1996 and 2008, project partners received almost $96 million to improve and protect water quality in the Chehalis River Basin. Nonpoint source project funding included $675,000 in CWA section 319 grants; $2.2 million in Centennial Clean Water Fund (CCWF) grants to Thurston, Mason and Lewis County CDs; $500,000 in Local Toxics Control Account grants for stormwater improvements; $400,000 in Aquatic Lands Enhancement Account grants for habitat improvement and vegetation control; and $502,000 in special appropriations administered by the state's Shoreland Environmental Assistance Program. Landowners and project sponsors contributed an additional $1 million toward those projects in cost-share funds. Although the FC pollution was primarily nonpoint source-related, significantly more funding was channeled to point source controls to support the high cost of maintaining and replacing sewage treatment plants. Funding for treatment plants included $75.5 million in state revolving fund loans and $16 million in Washington's CCWF grants.

The group's stated mission that guided the development of the Plan was to: develop a management plan that will result in effective, economical, and equitable management of the water in the Chehalis Basin to sustain viable and healthy communities and habitat conditions necessary for native fish.

Chehalis Basin Partnership
ORGANIZATION AND MEMBERSHIP
ORGANIZATION OPERATIONS

The Chehalis Basin Partnership became a WRIA planning unit through an intergovernmental agreement in August 1998 for the purposes of watershed assessment, planning and management:

"This Agreement shall designate a planning unit and a lead agency for purposes of assessing and managing the water resources of the Chehalis River Basin and to pursue strategies within the Chehalis River Basin which include the key elements of flood reduction, fisheries, recreation, watery quality and water quantity and examine their relationship to economic health and sustainability."

Shortly after its formation, the CBP adopted Bylaws. The adoption of an Operating Procedures Manual followed on September 24, 2004.

Intergovernmental Agreement
Bylaws
Operating Procedures Manual
MEMBERSHIP
Printable Membership List

The Chehalis Basin spreads from the headwaters near Pe Ell, up to the reaches of the Humptulips River in the Olympics, and into Grays Harbor. It includes parts of eight different counties; Cowlitz, Grays Harbor, Jefferson, Lewis, Mason, Pacific, Thurston, and Wahkiakum, and is one of the largest watersheds in Washington. Below is a list of partnership members:

MEMBER COUNTIES

Grays Harbor County
Commissioner Frank Gordon
360-249-3731

Lewis County
Commissioner Bill Schulte
Lee Napier, Alternate
360-740-1419

Mason County
Vacant
360-427-9670 x419

Thurston County
Commissioner Karen Valenzuela
Cindy Wilson, Alternate
360-786-5440

MEMBER TRIBES
Confederated Tribes of the Chehalis Reservation
Chairman David Burnett
Mark White, Alternate
Glen Connelly, Alternate
360-273-5911

MEMBER PORTS
Port of Centralia
Art Lehman
Charles Caldwell, Alternate
360-736-5192

Port of Grays Harbor
Charles Caldwell
360-249-4651

MEMBER CITIES & TOWNS
Aberdeen
Lisa Scott
Bob Waite, Alternate
360-537-3238

Centralia
Bonnie Canaday, Mayor
Kahle Jennings, Alternate
360-330-7674

Chehalis
Councilman Terry Harris
Patrick Wiltzius, Alternate
360-354-1042

Hoquiam
Councilman Paul McMillan

McCleary
Vacant
360-495-3200
Montesano

Mayor Ken Estes
360-249-5424

Napavine
vacant

Ocean Shores
vacant
360-289-2486

Pe Ell
vacant

MEMBER WATER DISTRICTS

Thurston PUD
Commissioner Chris Stearns
360-357-8783

Grays Harbor Water District #2
vacant
360-533-3490

MEMBER CITIZEN REPRESENTATIVES

Citizen - Grays Harbor County
Gary Waltenburg
Citizen - Lewis County
Lyle Hojem, Jim Hill, Bill Barmettler, Chris Cheney
Citizen - Mason County
Peter Hiebert, Jim Bottorf, Laurie Cox, Neal Cos
Citizen - Thurston County
Chanele Holbrook-Shaw, Earl Emerson, J. Roach

MEMBER STATE AGENCIES

Washington Department of Agriculture
Vacant
360-902-2051

Washington Department of Ecology
Chris Hempleman
360-407-0239

Washington Department of Fish & Wildlife
Bob Burkle
360-249-1217

Washington Department of Natural Resources
Chuck Turley
360-575-5002

MEMBER STAKEHOLDER GROUP REPRESENTATIVES
Business Representative
vacant

Fishery Interests: Chehalis Basin Fisheries Task Force
Terry Nielsen, Lonnie Crumley
360-482-2347

Agricultural Interests: Lewis County Farm Bureau
John Lucas, Julie Balmelli-Powe
360-249-4854

Forestry Interests: Weyerhaeuser
Annette Grainger
360-291-5540

What is the point of long range planning if no one follows the plan? Why would we invest hundreds of millions of dollars to preserve the salmon runs, and water quality if the result was oil storage tanks in the area at the mouth of the Chehalis? We made sure that our government officials were on board with the Chehalis Basin Partnerships plans and as officials sometimes due they see dollar signs and forget every thing else that has gone on before.

I want to reiterate these permits should be denied and this type of industry should never be considered for Grays Harbor again, we have invested too much time and money to have it undermined by proposals such as these. We have taken steps to stop any future thought of oil storage in Grays Harbor through the political process putting ordinances in place that will make this impossible in the future and due to the sensitive nature of Grays Harbor we are asking that these permits be denied.

Thank you for your time and consideration,

Teri J Franklin
tfrank655@techline.com

Response GP248-3

Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses potential impacts from construction and routine operation of the proposed action. Increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) and potential consequences (e.g., release of crude oil) are addressed in Chapter 4, *Environmental Health and Safety*. Section 4.7, *Impacts on Resources*, describes the general types of impacts on water, plants, and animals that could occur as a result of an oil spill, fire, or explosion.

GP249, **Freiberg, Pat**

Comment GP249-1

Hi. I'm Pat Freiberg, and I'm here today from Vancouver to say that every oil train reaching Grays Harbor passes through Centralia, Ridgefield, Vancouver, Camas, and points west to Spokane.

What happens with oil trains in Grays Harbor affects every community that the Bakken crews unit trains pass through. The DEIS ignores this fact, as if Westway, Imperium and Grays Harbor were together on an island, but we all know that this isn't so.

Response GP249-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP249-2

Federal Railroad Administration statistics show that once a month on average there's a major derailment involving spilled cargo, a fire explosion or loss of human life. It's strictly the math. For every one million rail miles traveled, there will be a catastrophic derailment, as seen in West Virginia in February and Illinois in March.

Response GP249-2

Comment acknowledged.

Comment GP249-3

Unit trains coming into Grays Harbor cross over at least 15 bridges that are over 100 years old. I read that one bridge was built in 1890. These bridges are built on wooden pilings and were never intended to carry the loads involved in modern oil by rail traffic.

The DEIS does not address how these bridges will be upgraded or reinforced. That's because it's a railroad problem, not an oil company problem.

My question is, will these bridges be upgraded at all, or will it require a catastrophic accident before the obvious problem is addressed? And who will pay for the upgrades? It won't be the oil companies. And it's probably not the railroad. As usual it will probably be the taxpayers. I urge you to deny this permit.

Response GP249-3

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless,

compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

GP250, **Freiberg, Pat**

Comment GP250-1

I am here today from Vancouver, to say that every oil train reaching Gray's Harbor passes thru Centralia, Ridgefield, Vancouver, Camas and points east to Spokane. What happens with oil trains in Grays Harbor affects every community the Bakken crude unit trains pass through. The DEIS ignores this fact as if Westway, Imperium & Grays Harbor were together on an island. We all know this isn't so.

Response GP250-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP250-2

Federal Railroad Administration statistics show that once a month, on average, there's a major derailment involving spilled cargo, a fire or explosion or loss of human life. It's strictly the math. For every one million rail miles traveled, there will be a catastrophic derailment as seen in W. Virginia in February or Illinois in March.

Response GP250-2

Comment acknowledged.

Comment GP250-3

Unit trains coming into Gray's Harbor will cross over at least 15 bridges that are over 100 years old. One bridge was built in 1890! These bridges are built on wooden pilings and were never intended to carry the loads involved in modern oil by rail traffic. The DEIS does not address how these bridges will be upgraded or reinforced. That's because it's a railroad problem not an oil company problem. My question is will these bridges be upgraded at all? Or will it require a catastrophic accident before the obvious problem is addressed? And who will pay for the necessary upgrade? Not the oil companies. Probably not the railroad. Most likely us, the taxpayers.

Response GP250-3

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge

management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

GP251, **Freiberg, Patricia**

Comment GP251-1

COMMENT DEIS WESTWAY, IMPERIUM (REG) PROPOSAL GRAYS HARBOR OCTOBER 8, 2015

PATRICIA FREIBERG 8327 NE 54TH STREET VANCOUVER, WA 908662

Anyone who has been around industrial areas involving crude oil knows that it's associated with a foul odor for a couple miles in all directions. The issue of odor is not addressed in the Draft EIS, not even in section 3 which focuses on the "aesthetics, light and glare" of this proposal. In fact, there is a vast emptiness in the Draft EIS regarding the considerations of smell, noise and vibration which will obviously impact the homes and businesses in the port vicinity.

Response GP251-1

Final EIS Chapter 3, Section 3.2, *Air*, reflects the addition of a discussion of potential impacts related to odor. The only compound with sufficient emissions to have the potential to have a perceptible odor is hydrogen sulfide. The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, are expected to reduce emissions of air pollutants, including hydrogen sulfide, to below the odor threshold for the most sensitive individual.

Draft EIS Chapter 3, Section 3.7, *Noise and Vibration,* provides an analysis of noise and vibration impacts related to the proposed action.

Comment GP251-2

The proposal requests adding 5 storage tanks to the existing 4 that are already on site. The 5 new tanks will be 150 feet wide and 64 feet tall which exceeds the City of Hoquiam height restrictions. The 4 storage tanks already in place are 24 feet shorter while the grain silos are 63 to 71 feet taller and also exceed the height restrictions but appear to operate under a conditional use permit from the City of Hoquiam. This proposal requests a conditional use permit be granted to the applicants to accommodate the height of the 5 new crude oil storage tanks that will be built. I suggest that this permit be denied.

Response GP251-2

Comment acknowledged.

Comment GP251-3

These tanks will store volatile Bakken crude and will need a venting system to prevent pressure buildup. What kind of venting system will be in place and how foul is the odor that will be vented

into the surrounding air space? Is there a filtration system in existence that can eliminate the stench accompanied with crude oil?

Because the issue of foul odor is not addressed and because the proposed storage tanks exceed Hoquiam's height restrictions, this proposal should be denied.

Response GP251-3

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions from onsite stationary sources. Refer to Response to Comment GP252-~~3~~ 1 on potential odor.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP252, **Freund, Sylvia**

Comment GP252-1

Months ago, I submitted my concerns on this project but I shall repeat them here. Although I live in Centralia, my Grandfather was an early settler and the second State Senator elected from the Hoquiam area. I cannot address the issues that city will face but I know how I will be impacted. I've lived in a historical neighborhood here since 1975. When we first moved here, there was a vacated railroad several blocks away that was only used to bring greens to be made into wreathes and swags at Christmas time. Then, about 25 or so years later traffic on the line began to increase, especially all night long and it is used as a "parking line" for traffic on the main line through town. If this project is approved, it is my understanding that the little parking rails will be revamped, the neighborhood north of the line will be cut off from our side of the rails, the children will be cut off from their neighborhood school and what is a historical, residential neighborhood will become an industrial thoroughfare. The possible danger we will face with the transported coal, the increased rail traffic, and the lowered property values will bring us NO benefits.

On an even larger scale, at a time when we face the disasters resulting from global warming, we will be victims of something that profits few at the expense of ourselves and our environment. At a time when we are trying to pursue cleaner energy sources, this project would encourage continued environmental damage and we would reap that not only in the transportation through our neighborhoods but also in the polluted air streams returning to us from Asia.

I know Grays Harbor and Lewis County are two of the highest unemployed counties in the State...but, perhaps, you instead of adding to our problems...could become leaders in solutions, like harvesting tidal energy? I feel I am talking to the wind...all of the logic will have no bearing on what will be decided it is a foregone conclusion. But I have to protest.

Response GP252-1

Comment acknowledged.

GP253, **Fuquay, Anita**

Comment GP253-1

Gmail: Oil Trains

Anita Fuquay swampgramma@gmail.com
Fri, October 9, 2015, 3:28 PM
Draft

Big corporations are asking the people of Grays Harbor to make a wager. We are to ante up our environment, our fisheries, our scenic beauty, our very lives and the lives of our loved ones. Against this bet, big corporations make a relatively modest investment in the community and promise us 245 permanent jobs. There is a 75% chance that we will lose this bet.

Any sane person in Las Vegas would simply turn away from a bet such as this. We here on the Chehalis estuary have everything to lose and almost nothing to gain, while Big Oil companies have almost nothing to lose and everything to gain. The odds are in favor of Big Oil. To them, it's like taking candy from a baby.

Even if the other 25% happens to prevail…and there is no catastrophic spill (and in this place, ANY spill would be a catastrophe) the Harbor would still end up filled with ugly storage tanks and our roads would be choked with blockages from the long oil trains.

When the oil corporations…which are already suffering from a glut of product on the market?ante up as much or more than we would have to here…such as their very lives, their jobs, their families' lives, their homes and everything dear to them…only then would the bet be a fair one. And we would still say "NO!!!"

Anita Fuquay
swampgramma@gmail.com

Response GP253-1

Comment acknowledged.

Comment GP253-2

I tried to send this via e-mail, but the address given is not viable. Guess that's one way to keep people from responding to the situation. When you say "all comments will be valued equally", does that just mean that nothing the public says will be considered at all?

Anita Fuquay

P.S. – Does the snail mail address not work, either?

Response GP253-2

The commenter does not provide any details about what email address did not work. Comments were received in writing (via email, U.S. mail and at public meetings), through oral testimony at public hearings, and via the web portal. All comments were entered into a comment

processing software and reviewed, and each individual comment within each submission was responded to. All comments were considered in updating the Final EIS.

GP254, **Garnett, Kathryn**

Comment GP254-1

I speak to you today as a member of the Faith Community in Grays Harbor. And I speak in opposition to the proposed moving and storage of crude oil in our community. God created our world and we are fortunate to live in one of the most beautiful areas of that creation. But even as we have been given this gift of beauty, we have a responsibility to care for it. The earth is fragile as are all the creatures, including we human creatures. We are the ones who must protect our environment. It is the heart and soul of Grays Harbor County.

Jesus talked to us about the consequences of failing to honor our commitment to protect God's creation. When we allow corporate profits to hold sway over God's creation and all the living things that inhabit this creation, we have warped our priorities and failed in our commitment. Jesus said: "For what shall it profit a man, if he shall gain the whole world, and lose his own soul?

The movement and storage of crude oil brings with it the potential for major environmental and economic disaster. Not only would this bring serious financial consequences to Grays Harbor, it would negate any potential economic gain that might be realized by additional industry in the area.

We all know that we live in an area that is beautiful, but environmentally fragile. Are the risks of moving and storing potentially dangerous materials being faithful caretakers of God's creation? Jesus asked if it profits one to gain the world, but lose ones soul. I would put that question to those who are weighing this decision.

Response GP254-1

Comment acknowledged.

GP255, **Gere, Susan**

Comment GP255-1

My name is Susan Gere. I live in Portland just across the Willamette River not far from the oil trains. It would destroy my home in the event of a fire caused by a derailed oil train. This fuel drive is a regional issue. No matter where they end up burning, we all live downwind.

Our planet is on the verge of irreversible disaster. We need to move away from fossil energy immediately if we have any hope of us having a sustainable and recognizable future. Convert to green energy as quickly as possible. For this and 1,000 other reasons detailed by others, you must deny these permits.

Thank you.

Response GP255-1

Comment acknowledged.

GP256, **Gervais, Anthony**

Comment GP256-1

Hello, I am writing today to strongly oppose the proposed Westway and Imperium Expansion Projects. I am a Puget Sound resident and frequent visitor (4-6 times per month) to the Grays Harbor area. Washington's ocean, waves and beaches are vital recreational, economic and ecological treasures that will be polluted by an increase in the transportation of fossil fuels thru sensitive ecological areas. Instead of pursuing transient and environmentally harmful ways to meet America's energy needs, we should seek comprehensive and environmentally sustainable energy solutions, including energy conservation.

The risk of an oil spill or accident is not theoretical, and far outways the benefits of this project. I do not support the proposed project. Thank you for your time and consideration. Anthony Gervais

Response GP256-1

Comment acknowledged.

GP257, **Gesseit, Kate**

Comment GP257-1

Climate Working Group 966 Jackson Eugene, OR 97402

Dear Director Maia Bellon,

Please oppose the building of oil terminals in the Grays Harbor. We would be transporting dirty oil from fracking to foreign buyers mean while producing large quantities of greenhouse gasses.

Sincerely,

Kate Gesseit Carey D Thompson Joan Kleba M. Gesseit Manetta O'Byrne Eric O'Byrne

Response GP257-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP258, **Gibbs, Virginia**

Comment GP258-1

As a former resident of Washington state, I have been following this project for some time with great concern. Frankly, I'm appalled that anyone would consider the Grays Harbor area for a fossil fuel terminal. Every time there's an oil train derailment somewhere in North America, I think "That'll happen in Hoquiam some day." Every time there's a tanker run aground somewhere, spilling crude oil on delicate coastal fisheries and recreational shores, I think "Someday, Grays Harbor will be ruined that way." The infrastructure for the terminal will be ugly and unattractive - even if there are no incidents, tourism will be affected. Property values will go down for those near the terminal or within sight. Is it worth it? I don't think those property owners would think so. A devastating

ecological accident only has to happen ONCE - and then ALL the other dependent industries such as fisheries and tourism are ruined for decades. Please don't risk ruining a beautiful and valuable resource like Grays Harbor.

Response GP258-1

Comment acknowledged.

GP259, **Giddings, Roxy**

Comment GP259-1

Name: Roxy Giddings
City/State/Zip: Tacoma, WA 98444-5118

Thank you for having this hearing. It is a good thing to study projects before we do them. I hope all the folks assigned to be trained on safety are already trained for the emergencies listed in the EIS. We are already being impacted.

Creating an EIS makes jobs—so good for us on that score.

Projects like these ask us to sacrifice this part of our state on the altar of dirty energy.

Mitigation is not just notification of trains & ships coming and going so we can stay out of their way. Of course that might ensure that the "accidents" are the fault of God alone.

The real question to me is economic. How much will it cost to replace Grays Harbor—its clean water, air, and life or lives.

No one should have to clean oil off of birds.

Response GP259-1

Comment acknowledged.

GP260, **Giddings, Roxy**

Comment GP260-1

I'm Roxy Giddings. I want to thank you for having this hearing. And it's a good thing the studies are published where people can review them. I see the folks with signs for safety. That has been mentioned. We already have trains because we're already doing this. This is an expansion. Projects are already in effect and therefore require you... I suggest that maybe businesses and everybody and in all the counties all the way around, because that's what you have to do, you have to look at what we've done with fires. They brought in people from all over.

And even having a golf tournament in Tacoma, University Place in Lacey, they had to bring people from all around for safety reasons and I suggest you carefully look at all around here.

Projects like these ask us to sacrifice this part of the state of Washington on the altar of dirty energy. Mitigation is not just a notification of trains and ships coming in and going so we can stay out of way.

The real question to me is economic. How much would it cost to replace Grays Harbor, and clean water, and all the lives of the things that are alive, including us?

No one should have to clean oil off of birds. I'm talking about in 1988, down at Long Beach. And I hope I never have to have my children or grandchildren or great-grandchildren have to clean birds because of these expansion projects.

Thank you.

Response GP260-1

Comment acknowledged.

GP261, **Giesler, Sheila**

Comment GP261-1

Name: Sheila Giesler
Organization Name (if applicable): St. Patrick's Catholic Church
City/State/Zip: Lynnwood, WA 98037

My comments relate to both the Westway and Imperium Draft EISs.

It has been proven that the oil trains are unsafe, running on unsafe rails. They are endangering our fragile environment.

As Washington State needs to (& is) rapidly moving away from fossil fuels, it is foolish to build more infrastructure to support yesterday's energy needs, rather than tomorrow.

Response GP261-1

Comment acknowledged.

GP262, **Gilmore, Thomas**

Comment GP262-1

Track defects are the leading cause of derailments and internal rail flaws account for the most damaging of them, according to an analysis of government data and academic reports. Those tasked with identifying and fixing track flaws say more needs to be done to improve track inspection, including more frequent checks.

Response GP262-1

Comment acknowledged.

GP263, **Goldberg, R. David**

Comment GP263-1

The state of Washington is already facing significant adverse, immitigable impacts from anthropomorphic climate change. The Washington Department of Ecology acknowledges this in a document posted on their website entitled "Climate Change: Disrupting our Economy, Environment and Communities". The numerous adverse impacts listed there include:

- Decreased snowpack- which leads to summer droughts and longer and more intense fire seasons, like the one we experienced

- Acidification of our oceans- which is decimating Washington's shellfish industry.

- Lower and warmer stream flows which are a threat to salmon survival.

- Disappearing glaciers http://www.ecy.wa.gov/climatechange/effects.htm

Are assertions like these reliable? According to Department of Ecology document "Q and A SEPA and Greenhouse Gas Emissions" yes they are. "Are the environmental impacts from climate change too speculative to include in a SEPA analysis? The impacts resulting from greenhouse gas emissions are reasonably foreseeable. Both the Security and Exchange Commission and the National Association of Insurance Commissioners require they be disclosed. The U.S. National Oceanographic and Atmospheric Administration has climate related information on a national scale while the University of Washington's Climate Impacts Group has information for the Pacific Northwest." http://ecy.wa.gov/climatechange/docs/sepa/faq.pdf The Department of Ecology acknowledges significant adverse, immitigable environmental impacts based on settled science. The projects must be denied. And since we are at the beginning stages of this crisis there are many more serious impacts of global warming on the horizon. The U.N. Refugee Agency estimates "that between 250 million and 1 billion people throughout the world" will become climate refugees in the next 50 years. http://www.world bank.org/en/news/feature/2014/10/14/cambio-climatico-mas-desplazados-que-un-conflicto-armado If our emissions continue at their current pace researchers lead by Benjamin Strauss of Climate Central conclude that as many as 600 cities or municipalities will be lost to the sea in the near future. https://www.washingtonpost.com/news/energy-environment/wp/2015/10/12/this-iwwws-how-rising-seas-will-reshape-the-face-of-the-United-States/ The lead agencies must decide whether the 139 permanent jobs and the 115 temporary construction jobs projected for these two projects are worth risking Washington's future. Use your substantive SEPA power to deny these projects.

Response GP263-1

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, describes the projected impacts of climate change in the Pacific Northwest. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP264, **Goldberg, R. David**

Comment GP264-1

I would like to comment on Bakken shale's contribution to global warming. My thesis is that the production and distribution of Bakken shale increases the worldwide supply of gasoline, which lowers the cost of gasoline, encouraging US drivers to buy bigger vehicles, travel more miles and emit more CO2, worsening global warming. Gas prices have gone way down. As KTVZ.com reports, nationally, gasoline prices for the peak summer driving season of 2015 were down 89 cents per gallon over the same period in 2014. Looking to the Northwest, Oregon gas prices are down an average of $1.10 over last year. http://www.ktvz.com/news/oregon-gas-prices-falling-but-still-well-above-us/35161634 Why are gas prices dropping? According to the "New York Times" . . . it boils down to the simple economics of supply and demand" attributed to the production of Bakken shale oil among other factors. http://www.nytimes.com/interactive/2015/business/energy-environment/oil-prices.html?action=click&contentCollection=Energy%20%26%20Environment%20&module=RelatedCoverage®ion=Marginalia&pgtype=article

Bakken shale is not replacing oil from other sources, as claimed by the DEISs for the Westway and Imperium projects but contributing to a worldwide glut. As a result of these lower gas prices American consumers are buying larger, more fuel consuming vehicles and driving more miles. According to InsideClimateNews.org automakers are reporting increased sales of SUV's and pickup trucks and declining sales for small fuel efficient cars. We are returning to levels of gasoline consumption not since record levels set in 2007. From 2007 to 2013 gas consumption actually went down every year, sometimes by as much as 18%. But in 2013 due to increased supply from the Bakken shale and an improving economy, gas consumption started to rise again. Gas consumption for January through May 2015 rose 2.9% as compared with the same period in 2014. American drivers in the period from January 2014 through June 2015 travelled 3.08 trillion miles, topping the record set in 2007-2008 for the same period. During the last week of July 2015 American drivers used 9.68 million barrels of gasoline, almost beating the old record of 9.75 million barrels of gasoline set in July 2007. As a result of these trends CO2 emissions from gasoline in 2013 were up almost 1%, 1.4% in 2014. http://insideclimatenews.org/news/12082015/americans-cheap-fuel-gas-emissions-rise-climate-suffers Several authorities feel that Bakken shale is increasing supply and decreasing gas prices everywhere. Bakken shale oil is not "replacing" oil from other sources. Climate activists hoped that 2007 would represent the peak year for US gasoline consumption followed by yearly decreases. But US consumption after stunning decreases for 6+ years are reaching the resumed peak levels of 2007.

Response GP264-1

Comment acknowledged.

GP265, **Goldberg, R. David**

Comment GP265-1

The DEISs for the Westway and Imperium projects do not look at the emissions that are created throughout the entire process of drilling Bakken shale oil in North Dakota and transporting it to

terminals in Washington and beyond. While the DEISs consider only end use emissions and those produced by rail transportation within the state of Washington, lead agencies are encouraged by statute to study projects' green house emissions from their source regardless of state or local boundaries. Documents posted to the Department of Ecology's website acknowledge global warming's significant, adverse effects on our environment. http://www.ecy.wa.gov/climatechange/effects.htmIn another document DOE concludes forecasts of these effects of global warming are based on sound science and that the effects of global warming are "easily foreseeable". http://ecy.wa.gov/climatechange/docs/sepa/faq.pdf The Department of Ecology acknowledges serious environmental adverse impacts on our environment.

SEPA law grants great flexibility to decision to deal with new circumstances. Since the grave dangers of global warming are now becoming more apparent we should use SEPA's substantive power to deny these projects. Greenhouse gas emissions from the Bakken shale wells in North Dakota are immense. Because the oil produced is worth more than the natural gas that leaks from their wells drillers spend every nickel they can on drilling more wells and next to nothing on capturing the gas. In 2012 drillers flared off approximately $1 billion worth of natural gas. That's the emissions equivalent of 1 million cars on the road for a year. Fracking for oil is five times more energy intensive than more conventional methods. It also requires additional energy to transport the massive amounts of water used in the fracking process greatly adding to Bakken's greenhouse footprint. Can the EIS consider emissions produced at the source of Bakken crude? According to the DOE's own Greenhouse Gas Guidance document the answer is yes. The section on "Evaluating Emission Sources" states "Scope Three emissions can include embodied emissions from the extraction and transportation of purchased goods." WAC 197-11-060 (4) (b) states "In assessing the significance of an impact a lead agency shall not limits its consideration of a proposals impacts within its jurisdiction, including local or state boundaries." If we can consider these emissions, why wouldn't we? Especially considering global warming's effects on our salmon, shellfish industry and our forests.

Response GP265-1

Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Comment GP265-2

Regarding our forests- In May of 2015 we experienced fires in the Olympic Rain Forrest something previously unheard of. Wildfires charred 300,000 acres this year in Washington and we currently face a fire season that is 35 days longer than in 1950. Scientists at the National Oceanic and Atmospheric Administration predict that in parts of the Western U.S. (including parts of Washington) large fires will increase six-fold due to global warming. The future of our planet versus a few hundred full and part-time jobs? This project should be denied.

Response GP265-2

Comment acknowledged.

GP266, **Goldberg, R. David**

Comment GP266-1

The DEIS's state that the projects will only contribute a small percentage to Washington's greenhouse totals. But quoting DOE's "Q and A" on global warming "..some commenters have suggested that the emissions of greenhouse gasses from a single proposal will never qualify as significant in light of the fact that a that a project's emissions a a mere fraction of the entire global problem, Federal and state courts have already rejected similar arguments."

Response GP266-1

Comment acknowledged.

GP267, **Goldberg, R. David**

Comment GP267-1

The oil terminals in Grays Harbor will lead to a net increase of up to 70,000 barrels per day more than there would be if the terminals were not built. This figure is based on a study commissioned by The Sightline Institute. Sightline chose Oil Change International to perform the study because they performed the analysis of the Keystone Pipeline climate impacts for the EPA. http://www.sightline.org/research_item/tracking-emissions/ Shipping Bakken shale to west coast ports are more profitable than sending it anywhere else. So oil companies will make more will start more projects. If new oil fully"replaced" old sources oil prices would not go up or down.

Response GP267-1

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

GP268, **Goldberg, R. David**

Comment GP268-1

The DEISs for these projects state the resultant emissions would represent "..less than .001% of the national 2025 target and less than .01 of the state 2050 target." But according to DOE's Q and A SEPA and Greenhouse Gas document: http://www.ecy.wa.gov/climatechange/docs/sepa/faq.pdf "Some commenters have suggested that the emissions of greenhouse gasses from a single proposal will never qualify as significant in light of the fact that a project's emissions are a mere fraction of the entire global problem. Federal and state couts have already rejected similar arguments." So the DEIS are bring up arguments already rejeced by courts.

Response GP268-1

Comment acknowledged.

GP269, **Golde, Hellmut and Marcy**

Comment GP269-1

HELLMUT & MARCY J. GOLDE
116 Fairview Avenue N, Apt. 428, Seattle, WA 98109
Telephone & Fax: 206-254-1633
E-mail: hgolde@golde.org, marcy@golde.org'

October 5, 2015

Department of Ecology
State of Washington
PO Box 47600
Olympia, WA 98504-7600

Re: Comment on DEIS regarding the Imperium and Westway Oil Companies

We have been residents of the State of Washington since 1960 and continue to spend much of our leisure time on the Olympic Peninsula, where we enjoy the scenic beauty and wildlife. We believe that oil terminals in Grays Harbor County and elsewhere on the Washington Coast are an invitation to increased pollution and potential ecological disaster. The damage to our wildlife and our way of life could be enormous. We encourage you to deny these companies the permits to build new fossil fuel export terminals.

Instead of adding to the pollution and global warning, companies should be encouraged to invest in clean, renewable energy production and distribution.

Sincerely yours,

Hellmut Golde

Marcy J. Golde

Response GP269-1

Comment acknowledged.

GP270, **Golde, Hellmut and Marcy**

Comment GP270-1

Hellmut and Marcy J. Golde 116 Fairview Avenue N, Apt. 428, Seattle, WA 98109 Telephone & Fax: 206-254-1633 E-mail: hgolde@golde.org, mercy@golde.org

October 27, 2015 Westway and Imperium Expansion Projects EIS c/o ICF International 710 Second Avenue, Suite 550 Seattle, WA 98104

Subject: Westway and Imperium proposed oil-by-rail terminals

Dear Washington State Department of Ecology and City o~Hoquiam staff and elected officials,

We are writing in support of the letter written and submitted by Pat McLachlan, which opposes the Westway and lmperium proposed oil-by-rail terminals. We have visited the west coast of the Olympic Peninsula at least once a month for the last 40 years, travelling through the towns of Aberdeen and Hoquiam, Washington. We have a vacation home above the beach north of the Raft River, and cherish the coastal beach. We have a personal interest in the decisions you are about to make. That coast is vulnerable to damage from any ocean oil spill. Grays Harbor is one of the most dangerous harbors on the Pacific Coast with its tide-dependent bar.

We urge you to· deny all requests for permits and authorizations for construction of the Westway and Imperium oil-by-rail terminals or associated facilities to trans-ship such oil.

The people, including the tribal villages of Taholah and Queets and all the small towns along the coast, fishing industry, the natural runs of salmon and other fish and various forms of coastal wildlife and the world famous Olympic National Park with it exposed coast all would be placed at risk by the creation of the Westway and Imperium terminals and the most of all by the whole plan to ship oil through the port of Grays Harbor. We urge each of you to turn down any plan to trans-ship oil through the Port of Grays Harbor.

In addition there are 7 federally declared and protected Wildernesses on the Olympic peninsula. They are the Washington Islands (right off of Hoquiam and the rest of the coast northward), Colonel Bob, Wonder Mountain, Mount Skokomish, The Brothers, Buckhorn, and the Olympic Wilderness. These Wilderness areas and the life within them would be irreparably damaged by spills and explosions that would be likely to occur in a setting where millions of gallons of dirty, crude oil are transported on trains into this area, stored in oil tanks, and loaded onto ships that travel the coastlines to refineries.

Response GP270-1

Comment acknowledged.

Comment GP270-2

Additional risk comes from the threat of a very large earthquake along the Cascade Subduction Zone. The odds of the big Cascadia earthquake of an 8. to 8.6 magnitude happening in the next 50 years are roughly 1 in 3. The odds of the very big one of a 8.7 to 9.2 are 1 in 10. Any such quake would cause tank rupture and risk a huge tsunami.

Please do not increase the risks by adding two or three oil transshipment facilities to Grays Harbor and the Olympic Peninsula's natural riches. Sincerely,

Sincerely yours,

Hellmut Golde Marcy J. Golde

Response GP270-2

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory

requirements and proposed mitigation measures would reduce potential impacts related to these events.

GP271, **Golding, Will**

Comment GP271-1

From my understanding there is a lot of resistance to this project from many of the local communities that will be impacted by implementing this proposed project. How will this proposed project benefit the local communities?

How can the operations of this proposed project impact local communities on a daily basis?

Response GP271-1

Refer to Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP271-2

What measures will be taken to ensure the safety and future prosperity of local communities that will be impacted this proposed project?

Response GP271-2

Refer to the Master Responses for Purpose and Focus of the EIS and Mitigation Framework.

Comment GP271-3

What methods will be implemented to ensure the structural integrity of the proposed infrastructure implementations?

Response GP271-3

The project design development and review would adhere to applicable building code requirements. Structural requirements specific to seismic risks are discussed in Draft EIS Chapter 3, Section 3.1, *Earth.*

Comment GP271-4

What effects will this proposed projects cause to the local marine environment?

Response GP271-4

Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses potential impacts from construction and routine operation of the proposed action. Increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) and potential consequences (e.g., release of crude oil) are addressed in Chapter 4, *Environmental Health and Safety*. Section 4.7, *Impacts on Resources*, describes the general types of impacts on water, plants, and animals that could occur as a result of an oil spill, fire, or explosion.

Comment GP271-5

What are the environmental considerations of this proposed project both in regards to its effect on the local natural environment, and overall effects on global warming producing climate change?

Response GP271-5

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses potential impacts of construction and routine operations of the proposed action. Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from the proposed action. These estimates have been updated in the Final EIS. Draft EIS Section 6.5.1.2 describes the projected impacts of climate change in the Pacific Northwest.

Comment GP271-6

What effects would rising sea levels have on this proposed project and its ability to ensure environmental protection from possible leaks contaminating local water systems?

Response GP271-6

As discussed in Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, based on the site elevation and predicted sea-level change in the study area, flooding is not expected to affect the proposed facilities. Final EIS Section 6.5.1.2 reflects further clarification.

Comment GP271-7

What benefits will this proposed project provide for the State of Washington?

Response GP271-7

Draft EIS Chapter 7, Section 7.1, *Economics*, identifies the employment, income (including benefits), and economic output that would be generated in the region by the proposed action during construction and routine operation.

Comment GP271-8

If problems arise during the life of the proposed project, what cost will the State of Washington be required to cover?

Response GP271-8

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP271-9

What effects will this proposed project have on Marbled Murrelet populations that rely on Washington's coastal areas to survive?

Response GP271-9

Draft EIS Chapter 3, Section 3.5, *Animals,* describes impacts of construction and routine operation of the proposed action on animals, including birds; Chapter 4, Section 4.7, *Impacts on Resources*, describes impacts on resources that could result from potential spills, fires, or explosions.

Comment GP271-10

What measures are being taken to ensure environmental protection of the areas where crude oil is being extracted in the Bakken Shale?

Response GP271-10

Refer to the Master Response for Purpose and Focus of the EIS. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Comment GP271-11

How will environmental protection procedures be monitored over the life of the proposed project?

Response GP271-11

For more information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework.

Comment GP271-12

What forms of actions will be enacted if contamination of the surrounding natural environment is detected during the life of the proposed project?

Response GP271-12

The regulatory framework in place to identify, respond to, clean up, and compensative for oil spills is described in Chapter 4, *Environmental Health and Safety*. Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Comment GP271-13

What effects could this proposed project have on native salmon populations?

Response GP271-13

Draft EIS Chapter 3, Section 3.5, *Animals,* describes impacts of construction and routine operations of the proposed action on animals, including salmon; Chapter 4, Section 4.7, *Impacts on Resources*, describes impacts on resources, including salmon, which could result from potential spills, fires, or explosions.

Comment GP271-14

How would a major oil spill from this proposed project affect the local environment and also all of the Washington Pacific Coastal areas?

Response GP271-14

Final EIS Chapter 4, *Environmental Health and Safety*, presents an analysis of potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil) under the proposed action in the study area. Final EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area, which are generally anticipated to be similar to those identified in Final EIS Chapter 4, Section 4.7, *Impacts on Resources*.

Comment GP271-15

What effects could an earthquake or tsunami have on this proposed project?

Response GP271-15

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment GP271-16

Is this proposed project objected by any indigenous peoples groups throughout the country?

Response GP271-16

All comments received on the Draft EIS are included in and responded to in the Final EIS.

Comment GP271-17

Have negative human health risks been associated with local populations in areas with similar existing projects?

Response GP271-17

Draft EIS considers the following impacts related to human health.

- Chapter 3, Section 3.2, *Air*, describes potential impacts on air quality and the potential for increased cancer risk from emissions of diesel particulate matter related to construction and routine operation of the proposed action.

- Chapter 3, Section 3.7, *Noise*, describes potential impacts on sensitive receptors near the project site and transportation corridors from increased noise and vibration related to construction and routine operation of the proposed action.
- Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, describes potential impacts on public safety and emergency vehicle access from increased vehicle delay related to rail traffic from routine operation of the proposed action.
- Chapter 4, Section 4.7.1.7, *Human Health*, describes potential impacts of an oil spill on human health.
- Chapter 4, Section 4.7.2.3, *Human Health*, describes potential impacts of a fire or explosion on human health.

GP272, **Gooding, David**

Comment GP272-1

We must stop supporting dirty energy in the world theater and place our efforts in alternative solutions. We are contributing to our own foul health, poisoning the earth. The coal dust goes freely into the air, there have been explosions, fires and consequent deaths from these coal trains. We cannot allow more tragedy in populated areas and sports stadiums. STOP THEM NOW!

Response GP272-1

Comment acknowledged.

GP273, **Gordon, Diana**

Comment GP273-1

Washougal is located along the Columbia River straddling the rail tracks. We get the cumulative effect of every oil or coal train that goes by. They delay us at our 5 at grade crossings, endanger our schools, our downtown, parks, and damage our livability as well as our property values. Since our home is our largest investment, I very much oppose the idea of more oil terminals here.

Response GP273-1

Comment acknowledged.

Comment GP273-2

We are between the Washougal and the Columbia Rivers so we have flooding issues occasionally, for example, in 1996. I was curious about flooding issues you might have so I looked in the DEIS, Appendix E, to look over the FEMA maps for your area.

The maps in the DEIS are old and small and not at all up to date. The one from 1978 is interesting in that it shows the marine slip that was filled in starting in 1983 and is currently being used by Westway and Imperium for their terminals. A map from 2006 to reflect the new Zone C rating is also included. This area went from a watery boat slip to a Zone C which reflects a 100 year flood risk in just a few years.

[Maps reviewed but not reproduced.]

But the 2006 map does not give us a clear picture of the flood risk for the project site because it is of a very small area. The project area is at the mouth of the Chehalis River which is quite a large river system - 2600 square miles. It is 'wild' river with no flood control or hydroelectric dams to slow down the water in case of a flood event. This looks like many miles of flooding on a river that comes out right at the project site where the elevation is about 10 feet. In fact, this part of the port is surrounded by areas that are in the 100 year floodplain so in the event of a 100 year flood the project will become an island.

This is a 2015 Digital Flood Insurance Rate Map from the Department of Ecology clearing showing that circumstance. I do not understand why it was not included in the DEIS. You can see the swollen Chehalis River covering the neighborhoods around the project site and cutting off all road access to it.

We know that with climate change the sea level is rising and that severe weather events are slated to become more extreme. Right .now, there are four other extreme weather events going on around the world in addition to the awful flooding in South Carolina. The Letter of Map Revision sent to the cities explaining the 2006 maps says that a comprehensive restudy of these communities' flood hazards could establish greater flood hazards in this area. They may then require higher floodplain management criteria. The communities' criteria will take precedence over the federal ones.

I feel this comprehensive restudy should be undertaken to understand the full impacts of various kinds of floods on this critical area.

Diana L. Gordon
6421 Street
Washougal, · WA 98671-1129
October 8, 2015
tndgardens@comcast.net
360-835-77 48

Response GP273-2

The floodplain maps in Draft EIS Appendix E, *FEMA Flood Insurance Rate Maps,* are the currently approved Federal Emergency Management Agency (FEMA) flood maps for the project site and are therefore, used in the analysis of impacts on floodplain. However, as explained in the Chapter 3, Section 3.3.4.4, *Floodplains*, and based on the new comprehensive preliminary Flood Insurance Study conducted by FEMA in 2013 (in coordination with Washington State Department of Ecology and Washington State Department of Natural Resources), the floodplain maps at the project site were revised and remapped by FEMA in October 2013. The new floodplain map is currently pending approval from FEMA. As stated in the Draft EIS, the project site is outside of floodplain based on the new and revised floodplain study and mapping effort. The elements of the proposed action that would require new construction are in an area mapped as Zone X, which is outside of the 100-year and 500-year floodplains (i.e., areas determined to be outside of the 0.2% annual chance of flood). Therefore, the project site poses no risk to the floodplain because the proposed action's construction or placement of any new structure (e.g., storage tanks and new rail spurs) would occur outside of the floodplain and would not affect or be affected by floods or flood flows. The revised 2013 floodplain map, which the commenter references as Washington State Department of Ecology's

"2015 Digital Flood Insurance Rate Map," is included in the Draft EIS and is the basis for the floodplain assessment.

Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts, Climate Change*, reflects clarification regarding predictions of sea level change in the project area and potential for flooding at the project site. With predicted sea level rise in the project area for 2050 of 1.57 feet, the project site will remain approximately 5 feet higher than the projected high tide. As such, it would not be subject to flooding even during extreme storm events.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

Comment GP273-3

The RR has added new siding to tracks that ran through town near schools & shopping areas. I don't think anyone in Washougal likes to see mile-long oil trains parked for hours just a few yards from our h.s., m.s., & our school district offices.

Our school board took the extraordinary step of adopting a resolution asking state agencies to refuse permits for any further increases in oil train traffic in Washington. As a retired teacher I couldn't agree more.

Response GP273-3

Comment acknowledged.

GP274, **Gordon, Diana**

Comment GP274-1

A DEIS must carefully and thoroughly assess the impacts of a proposed project on the area where it is actually located. It must also, however, consider impacts that the project could have on other areas that it affects. The trains serving the Westway Terminal will be from the Bakken Oil Fields of North Dakota. On their way to Grays Harbor, they will pass through numerous communities in the Columbia River Gorge and Eastern Washington, as well as many, many others all the way back to North Dakota.

We live in Washougal, Washington at the mouth of the Gorge, and are very much opposed to an increase in oil train traffic. We already have several trains of explosive, Bakken crude coming through our community every week. Sometimes we see them pulled over on a recently added siding across the road from our high school, middle school, district education offices, and a shopping center housing Safeway, our only supermarket. These trains tie up our 5 at grade crossings making access to our downtown difficult. Our only overpass, which is supposed to handle emergency traffic, is often backed up especially at rush hours due to the volume of traffic.

These trains pass through our downtown, feet from city hall, the library, the senior center, many business including the famous Pendleton Woolen Mills and hundreds off residences. We receive increased air pollution from diesel train engines and idling cars as well as considerable inconvenience.

We also face decreasing property values from being located in a 'fossil fuel corridor'.

Needless to say, any mishap - a spill, a derailment, an explosion - would have a devastating effect on Washougal. Please deny this project. Diana Gordon November 28, 2015 642 I Street tndgardens@comcast.net Washougal, WA. 98671-1129

Response GP274-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP275, **Gordon, Diana**

Comment GP275-1

After testifying at the hearing in Aberdeen on October 8, 2015, I went next door to an information center. My question: Could the Grays Harbor projects switch over to shipping tar sands oil without re-permitting. Unsettlingly, the answer was affirmative.

Oil from the Alberta Tar Sands is a nasty business. It is very thick and will not flow readily so they add propane and other substances to make it easier to handle. We are never exactly sure what we are getting when we are dealing with 'dilbit', or diluted bitumen. Fortunately, it does not explode readily, but, if spilled as the result of an accident, derailment, puncture, earthquake, etc., it oozes along the ground coating everything in its path. Worse still, if spilled in water, it sinks and coats the bottom of the waterway killing vegetation and organisms (oysters, crabs, and so on) in its path. We know that fresh water, turbulence, and sediment in the water speed up the sinking. The PS & P Railroad runs right along a 'wild' river which probably furnishes all 3 factors along most of its length. Tar sands oil is difficult to see and difficult to clean up. The Enbridge tar sands spill in the Kalamazoo River in Michigan in 2010 has stretched at least 20 miles downriver and cost $1.21 billion so far. The clean up is not yet finished. If tar sands oil got into the salt marshes at Grays Harbor, it could have far reaching consequences for the estuarine and marine food web. Clearly, a tar sands spill would have a devastating effect on Grays Harbor's fishing, oyster, crab, and tourist industries. Paying for such an accident is a huge problem. If a spill occurred in Grays Harbor, who would pay? If a spill occurred further up the Chehalis Rver and the oil spread downstream into Grays Harbor affecting fisheries there, who would pay then? I think these questions should be answered before this project is allowed to go forward, and that the project should be discontinued at this time. Diana Gordon November 28, 2015 642 I Street tndgardens@comcast.net Washougal, WA 98671-1129

Response GP275-1

As noted in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, such plans are not required prior to operations and have not been developed. However, once the plans have been submitted to Ecology, such as the contingency plan required by WAC 173-186, they will be available for public

review and comment for a period of 30 days. Refer to the Master Response for the Purpose and Focus of the EIS.

To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

GP276, **Gordon, Diana**

Comment GP276-1

One of the major problems in this Grays Harbor project is the rail link between the main BNSF line and Grays Harbor. This small line, the Puget Sound and Pacific, would be admirably suited as a scenic excursion trip for tourists. It is not, however, ready, for this project. The PS & P is about 125 years old. It was not built to carry extremely heavy mile plus long trains filled with hazardous materials. These are some of the questions I have about it: > Can the bed support the weight of these trains passing week after week? > Are the 52 bridges and culverts strong enough to sustain this long and repetitive weight over time?> The tracks run along a 'wild' river, one with no flood controls or dams. This area has experienced considerable flooding in the past. If an oil train were passing through, could the rail bed, bridges, and culverts sustain a powerful flood without a derailment or spill? > We are in earthquake territory - how large a quake could this railroad sustain without incident? a 4.5? a 7.0?

Response GP276-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant. Regarding earthquakes, refer to Final EIS Chapter 3, Section 3.1, *Earth*, the Master Response for Seismic Risk and Design Requirements, and the Master Response for Purpose and Focus of the EIS.

Comment GP276-2

What is the Spill Plan for this small, Class 2 railroad? > In the event of a spill, derailment, or explosion, who will be responsible for the damage to life and property as well as downstream economic and ecological damage to the salt marshes and estuarine ecosystems?

Response GP276-2

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Comment GP276-3

Where are the closest HAZMAT teams? I think Olympia or Tacoma. Their response time could be 2-3 hours.

Response GP276-3

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks.

Comment GP276-4

This project raises many environmental, seismic, flooding, economic, and safety concerns, many of which cannot be mitigated. Shipping crude oil by rail is new, developed mostly in the last 5 years. We are not yet aware of and do not yet have the capabilities to deal with all the problems it can present. We do not yet know the cumulative effects of shipping oil this way over time. We certainly do not yet have in place even the most basic safety measures, such as foam to be used in the event of an explosion. I do not think the fragile area of Grays Harbor is ready for this enterprise at this time. I think it would be irresponsible for the safety of human life and the environment to proceed.

There does not seem to be a real need for these terminals right now and they should be denied until they can be done with safety. Diana Gordon November 28, 2015 642 I Street tndgardens@comcast.net Washougal, WA 98671-1129 360-835-7748

Response GP276-4

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP277, **Gordon, Diana**

Comment GP277-1

Truth be told, geology has a tendency to make my glaze over. However, we all know the Pacific Northwest is an earthquake zone and locating oil terminals in an quake zone is a risky business. In 2004 the world watched in horror as a huge quake devastated southeast Asia and again in 2001 as a

9.0 quake hit Fukushima , Japan. The resulting tidal waves did unspeakable damage, killing thousands of people and permanently disabling the Fukushima power plant. The ensuing environmental disaster will haunt us for decades. The Pacific Northwest receives a very large quake, 7.0 plus, about every 350 years. We are overdue, and likely to receive one within 50 years. This would be a subduction zone quake where the coastal plate slips under the North American plate, usually generating a huge tidal wave. We would assume that in an earthquake prone country like Japan, a nuclear power plant like Fukushima would be built to a very high standard, a higher standard than an oil terminal placed on fill material in a harbor. Yet it took took only minutes for the earthquake's tsunami to compromise Fukushima permanently, spreading radioactive material far and wide. Grays Harbor is not a good place for these terminals. The fill material under the tanks will liquify in a quake and the tanks would likely be punctured in a tsunami spreading oil that will damage the environment and plague us for years.

The best solution to the earthquake is to find another place to locate these terminals if they are deemed truly necessary and not just a revenue generator for the port. Putting oil terminals in Grays Harbor really is a disaster waiting to happen and it could easily happen within our lifetimes.

Response GP277-1

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

As noted in the Master Response for Project Objectives and Alternatives, the EIS analyzes the potential impacts of a private project on a specific site; the objectives and proposal are defined by the applicant.

GP278, **Gordon, Diana**

Comment GP278-1

This year the Quinault Nation was able to open its crab fishing season more than a week earlier than Oregon and most parts of Washington. Their crab fishing area was spared the toxic algal bloom that plagued other areas. I doubt they dodge the bullet every time some thing like a toxic bloom occurs. However, we should take all possible precautions to preserve their vibrant and lucrative fishing industries. Quinault engage in ocean fishing using Grays Harbor as home port; they manage razor clams near Grays Harbor as well as fishing for crab. They have subsistence and commercial fishing rights. These treaty rights are part of our Northwest culture and safe guarding them is important to all of us.Fisheries, etc, will be much more at risk if these terminals go in. They bring an increased risk of spills and fires both at the terminal and along the rail line. A crude oil incident would be serious and damaging. A dilbit spill (where the oil oozes along the bottom of the waterway) would be potentially devastating. Tankers and tank barges also have mishaps. One spill affected beaches from Vancouver, B.C. to Oregon. The Quinault are already facing increased ocean acidification from increased world wide levels of green house gases and this project would result in still more. Acidification is a serious threat to shellfish whose shells are affected by increased acidity. (Witness

the recent move of some Northwest oyster farms to the less acid waters of Hawaii.) Please safeguard the fishing rights of the Quinault (and everyone else). Do not allow these terminals to be built in Grays Harbor.

Response GP278-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP279, **Gordon, Diana**

Comment GP279-1

An important concern about terminals in Grays Harbor is the amount of greenhouse gases they will generate. Greenhouses gases will be produced by the trains hauling the oil, the volume of traffic idling at crossings waiting for the trains to pass, the production of crude itself, and the eventual use of these fuels. We know that increasing levels of gases in the environment accelerates global climate change. The temperature has been inexorably rising for many years and we can see higher water levels around the globe as water in the ocean heats up and causes a rise in sea level. Melting glaciers and ice sheets also contribute, The Grays Harbor terminals are in a 500 year flood plain by just a few feet and are surrounded by 100 year flood plains. Pictures of the existing tanks surrounded by flood water and cut off by road from the surrounding neighborhood and therefore any emergency response vehicles are easy to find on the Internet. We should not assume that tanks only 9 feet above sea level are safe. South Carolina is recovering from 100 year floods a few months ago. We would all like to think that this kind of thing is rare, but it is not. This is the sixth one-in-a-1000 year weather event occurring since 2010 in the U.S.

I feel that we at the state level must deny these projects. We cannot count on the federal government, the President, or anyone else to help with these choices. We can see that the Grays Harbor projects are dangerous on many levels. They provide very few permanent jobs and have the potential to decimate an economically and environmentally vibrant part of our state. Please say no to these terminals.

Response GP279-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Final EIS Section 6.5.1.2, *Climate Change*, clarifies predictions of sea level change in the project area and potential for flooding at the project site. With a predicted sea level rise of 1.57 feet in the project area by 2050, the project site will remain approximately 5 feet higher than the projected high tide. As such, it would not be subject to flooding during extreme storm events.

GP280, **Gordon, Diana**

Comment GP280-1

My name is Diana Gordon. And I live in the state of Washington. Washougal is located along the Columbia River straddling the rail tracks. We get the cumulative effect of every oil and coal train that go by at at-grade crossings, and that can be a problem.

They endanger our schools, our downtowns, our parks, and damages our livability as well as our property values. Since our home is our largest investment, I oppose the oil terminals here.

Now, in Washougal the railroad has added new signage to the tracks that run right through town, near the schools and shopping areas. I don't think anyone in Washougal feels comfortable to see a mile- long oil train parked for hours right next to our schools, businesses, and offices.

Our school board took the extraordinary steps of selecting the resolution asking state agencies to refuse permits for any further increase in oil train traffic through our state. As a retired teacher I couldn't agree more.

Thank you.

Response GP280-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP281, **Gordan, Don**

Comment GP281-1

My name is Don Gordan. The DEIS states, In this city there are broader involving issues that could affect the project site, transportation, including landslides, and slope instability, earthquake and earthquake-related activity, volcanic activity.

I have been concerned about the Westway and Imperium terminals here in Aberdeen. And some of the concerns for the EIS forecasts involving around earthquakes and tsunamis. For instance, forecast for the terminal range magnitude from 6.0 to 9.0 earthquake. The terminals will have tides from two to 9.61 feet instantaneous. This means the oil tanks will fall. The terminal site is a safety issue. The earthquake would be followed by a tsunami ranging from two feet up to 26 feet above ground. The design is threatened according to minimum design standard defined by the International Building Code. These are not required in the consideration -- to be considered, such specific tsunami risks the tanks that are already there withstand the tsunami earthquakes that might come.

Thank you.

Response GP281-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

GP282, **Gordon, Frank**

Comment GP282-1

Frank Gordon, Grays Harbor Planning Commission, speaking for myself. Hi, how you doing?

I guess everybody spoke so well out here but I just have a couple things. One on safety. I don't care how well the tracks are made and whatnot, as you can see, like the airline industry we have the best trained people in the world. Most accidents are caused by human error. I don't care how well we have it, we're going to have human error. Most of these train wrecks we've had that go down, they're caused by human error. I don't think we can stop the potential accident from happing.

The second thing is, when we were talking about jobs, okay 30 percent of the jobs are created with marine resources. That doesn't count our Native American jobs, our Native American (inaudible) in Grays Harbor County. It's the biggest employer we have here.

And then we've left East County of Grays Harbor and Lewis County. And we have a (inaudible) on the river in the wintertime and we have high tides in the fields (inaudible), and fields are useless for years and years and years. It will destroy our dairy industry. It's not even just the seafood, it's the whole thing. And we have a culture here. We have a culture that's so important, I'm asking you personally, please say no, we just ask not afford the loss for such a short-term gain. Thank you very much. Appreciate it.

Response GP282-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP283, **Gordon, Frank**

Comment GP283-1

My name is Frank Gordon, Grays Harbor County Commissioner for District 2. My constituents are seafood people, and so I would like to speak my opinion and the people that I represent we are against crude oil because crude oil cannot be brought in safely.

We are not against oil per se. We all have gas vehicles and everything like everybody else, but they don't have the ability or the skill to control if we had a spill and the loss of jobs that would overwhelm and destroy the harbor.

That's just my short statement I would like to reinforce. I spoke last week so I just want to reinforce that. Thank you.

Response GP283-1

Final EIS Chapter 4, *Environmental Health and Safety*, acknowledges that, while the risk of an oil spill is low, if one were to occur, it would likely cause unavoidable and significant adverse environmental impacts and that significant impacts to human health and the environment could occur even as the result of smaller incidents. The specific impacts would vary based on the location, amount spilled, type of liquid, river flow, time of year, and weather conditions.

GP284, **Gordon, Frank**

Comment GP284-1

Name: Frank Gordon
Organization Name (if applicable): GH Commission Dist 2
City/State/Zip: Montesano, WA 98563

My comments relate to both the Westway and Imperium Draft EISs.

1. We are in a earthquake zone
2. Rail line not built for traffic of oil cars
3. Harbors main source of job marine
4. Spill would change our way of life
5. Heavy crude (no tools to clean off bay, river bottom)
6. Land where tanks get would go liquid during earthquake

Response GP284-1

Comment acknowledged.

GP285, **Gordon, Pat**

Comment GP285-1

My name is Pat Gordon. I'm a resident of Aberdeen. I've been on the harbor for 53 years. I'm concerned about my children, my grandchildren, and my great grandchildren.

We want no oil. The spill will take away our fishing jobs, all kinds of jobs that are done with fishing. I love my clams. I hope you do too.

So that's my statement. I do not want crude oil.

Response GP285-1

Comment acknowledged.

GP286, **Gordon, Thomas**

Comment GP286-1

I am concerned about earthquakes and that their full range of effects have not been addressed in the DEIS. The oil tanks would have to withstand not only the force of magnitude 6.0 to magnitude 9.0 earthquakes, but an earthquake does not always just span a second or a few seconds. A large earthquake could last minutes. The DEIS does state that the side to side motion of an earthquake could be up to 0.7 g, where a g is the force of gravity. This is like a 200 lb man being slammed in his side with 120 lb. However, this could go on for minutes. How could a 150 ft wide oil tank survive crude oil sloshing around inside with such force for minutes? Thank You, Thomas Gordon

Response GP286-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

GP287, **Gordon, Thomas**

Comment GP287-1

The DEIS describes the material that the proposed terminals would be built on. This ranges from peat to sand to sandy-gravel to gravel, which extends down to bedrock which is 150 to 200 or more feet down. Tanks would be built on pilings, but the DEIS also states that some of these various layers could move partially or completely, leaving sloping ground holding up the 150 foot wide tanks filed with crude oil. The pilings, if not broken, would be under tremendous strain to keep the oil tanks from rupturing. This is a bad place to place oil tanks. Thank You, Thomas Gordon

Response GP287-1

Proposed piles would be driven to necessary depths to reach required embedment into competent soils. Final EIS Chapter 3, Section 3.1, *Earth*, clarifies that, based on investigations completed at the project site (Hart Crowser 2013, as cited in Chapter 3, Section 3.1, *Earth*), competent soil is generally reached at 150 feet below-ground surface.

GP288, **Gordon, Thomas**

Comment GP288-1

My concerns are many, but one main one earthquakes. According to the DEIS, an earthquake, depending on the strength of the earthquake of magnitude 6.0 to magnitude 9.0, would have an instantaneous subsidence of 2 to 9.61 feet. This means the oil tanks would fall 2 to 9.61 feet. The DEIS does not take into account this force the tanks would be subjected to and have to withstand. A tsunami could accompany the earthquake and devastate the tanks, if any remained intact. Thank You, Thomas Gordon

Response GP288-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

GP289, **Gordon, Thomas**

Comment GP289-1

I oppose the oil terminals in Aberdeen and Hoquiam. The City Council of Aberdeen opposes these terminals. The SCOPING form requesting public comments last spring, 2015, said ". . . this project is likely to have adverse impact on the environment." These are only a few that oppose the oil terminals proposed by Westway and Imperium. Commercial fishermen and crabbers also oppose

these terminals. With such opposition, both public and private, the EIS should reflect this concern from many quarters. In the end, these projects should be canceled.

Response GP289-1

Comment acknowledged.

GP290, **Gordon, Thomas**

Comment GP290-1

I oppose the proposed oil terminals in Grays Harbor by Westway and Imperium. One of my areas of concern involves the railroad into the Grays Harbor area. Many of the bridges from Centralia on the PS&P Railroad are over 100 years old. With an estimated 37.5 trains a day, these structures would be put under tremendous strain. Landslides occur even now blocking the rail line every so often just from slope failures. The entrance into town is below a sharp cliff of sedimentary material, mainly compressed sand, which is prone to collapse. If this should collapse, both the highway and railroad would be covered. This is no place to put oil terminals, with the danger of transmission of oil on this old railroad, to unstable slopes adding to the hazard. All of these things should be expanded on in the EIS and the recommendation should be against these terminals.

Response GP290-1

As described in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, the proposed action would add 1.25 unit train trips per day on average along the PS&P rail line to the 3 train trips under the no-action alternative.

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

GP291, **Gordon, Thomas**

Comment GP291-1

I oppose the proposed oil terminals in Grays Harbor by Westway and Imperium. With a projected 37.5 trains a day coming into the area each day, access for both emergency vehicles and normal traffic would be greatly hindered at rail crossings in Aberdeen and Hoquiam. The towns people and tourists would not be enamored with waiting for unit trains over a mile long to snake their way through town. Waits of 20 minutes or linger would be common. More importantly, emergency vehicles would not be able to transport people to the hospital and fire engines would not be able to

respond to fires in a timely manner. Please address these issues in your EIS and recommend against these terminals.

Response GP291-1

As described in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, the proposed action would add 1.25 unit train trips per day on average along the PS&P rail line to the three train trips under the no-action alternative.

Emergency vehicle impacts are addressed in Draft EIS Section 3.16, *Vehicle Traffic and Safety*, for the proposed action, and Section 6.5.5, *Vehicle Traffic and Safety*, for the cumulative projects. The Final EIS clarifies the potential for unavoidable and significant adverse impacts.

GP292, **Gordon, Thomas**

Comment GP292-1

TESTIMONY ON THE PROPOSED WESTWAY OIL TERMINAL ABERDEEN, WA, OCTOBER 8, 2015

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

I have many concerns about the proposed Westway oil terminal here in Aberdeen and some of them concern the DEIS forecasts revolving around earthquakes and tsunamis.

For instance, forecasts for the terminal range from a magnitude 6.0 to 9.0 earthquake, state that the terminal will have subsidence from 2 to 9.61 feet instantaneously. This means the oil tanks will fall, that's right fall, 2 to 9.61 feet No where in the DEIS did I see this factored in. The tanks would have to withstand this, while accompanied by powerful shaking up to 0.7 g back and forth, where 1 g is the strength of gravity. In fact, the terminal site is Class E, which is the worst for increased ground shaking with the materials the site is built on, which range from peat to silt to sand to gravel, while hard rock is 150 to 200 or more feet down .Any oil tank would have to withstand great strains to not rupture.

The earthquake would be followed by a tsunami, ranging from 2 feet up to 26 feet above ground level. ''The new tanks are expected to be designed and constructed according to minimum design standards as defined by theInternational Building Code, adopted through State Building Code [RCW 19.27) and City Building Codes [HMC 2.08 andAMC 15.08] do NOT require consideration of site-specific tsunami risks."

Could the tanks that Westway already have there holding methanol withstand these forces?

Thomas Gordon 642 I Street Washougal, WA 98671 (360)835-7748 tndgardens@comcast.net

Response GP292-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction. The Draft EIS

presents an analysis of potential impacts of the proposed action; it does not analyze the existing facility.

GP293, **Grace, Lise**

Comment GP293-1

Dear WA Dep't of Ecology and City of Hoquiam: The DEISs for Westway and Imperium oil terminal proposals must be substantially revised to fully disclose the risks of oil spills, train accidents, increased train / oil tanker traffic, air pollution, noise, tribal culture and resources, delays at railroad crossings, negative impacts on the Columbia River Gorge National Scenic Area, and climate change. It is highly likely that the indirect and cumulative environmental impacts would be significant and impossible to mitigate.

Furthermore, the DEIS failed to substantively address the concerns raised by many environmental groups and individuals, in particular the concerns related to the Columbia River Gorge National Scenic Area. This is inconsistent with the scenic area act, and it is illegal under the State Environmental Policy Act to ignore these impacts. Some specific examples of this include:

1. The DEIS fails to analyze the indirect project impacts to grade crossings in the Gorge, the extent that the increase in oil trains would impact the level of service for local traffic, and any necessary mitigation measures, such as new overpasses.

2. The DEIS fails to analyze the cumulative impacts to grade crossings from the proposal and other oil and coal export proposals, the likely need to construct additional sidings, overpasses, and second tracks, and the need for additional emergency response capacity along the entire rail route.

3. The DEIS fails to list the Columbia River Gorge National Scenic Area Act and Management Plan as an applicable regulation, despite the fact that the cumulative impact of additional oil train traffic would require new construction in the National Scenic Area.

4. The DEIS fails to disclose the actual risk of an oil spill or explosive accident in the Gorge. The DEIS provided analysis of the risk of a spill or explosion near the facility where maximum speeds are limited to 25 mph. The DEIS completely fails to disclose the risk of spills and explosions in the Gorge, where the maximum speed is 50 mph for unit trains of oil and 60 mph for mixed-commodity trains with up to 34 oil tank cars dispersed throughout the entire train.

5. The DEIS fails to analyze the likelihood of a spill in the Columbia River along hundreds of miles of the BNSF rail line. Along with failing to analyze the likelihood of a spill, the DEIS fails to analyze safety impacts to local communities, environmental impacts to threatened and endangered salmon species in the Columbia River, and operational impacts on Columbia River Dams. There is simply too much risk and too little reward from these proposals: Grays Harbor and rail-line communities would take on the risk and oil companies would reap the profits, while Grays Harbor and the Columbia River Gorge would become a through-way for oil going elsewhere. What makes these regions special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, spectacular coastal waters, sensitive habitats and protected lands and waters in the Columbia River Gorge. The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line from Aberdeen to Chehalis, through the Columbia River Gorge, and all the way to

the source of the oil in North Dakota and elsewhere. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our electricity needs and respond to global warming. Building large infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor. Washington state should continue to lead on safe, renewable, clean energy solutions and say no to more oil and coal. I urge you to to stop dirty and dangerous projects.

Response GP293-1

The proposed action does not involve construction in the Columbia River Gorge National Scenic Area.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

GP294, **Graham, Bill**

Comment GP294-1

Thank you, Mr. Keillor. My name is Bill Graham and I'm from Ocean Shores here in Grays Harbor County.

Unlike the others, I want to direct this to a particular scientific sort of thing. And before I begin, I'd like to say that I want to spell salmon P-S-A-M-M-O-N and not S-A-L-M-O-N.

Thank you, Mr. Keillor, for a chance to describe dangers likely from the river. (Inaudible) are transferred oils into the harbor. The oil grades of interest here include those which cannot be modeled by GNOME even were the trajectory models and the contour models available to address my concern, which they're not.

My concern is the salmon and other inverted (inaudible) are dependent upon the periodic position and replacement of alluvial deposits in North Bay and South Bay by Tulips River and the other large rivers from the south.

These are washed in, washed out, and they're tidal and they bring down a constant flow of silt and other things that are absolutely vital not only to the inverted (inaudible) but everything that depends on it, the huge migration of the western (inaudible) that stops here and is dependent on the biomass available.

So, wide-raging biochemical magnification of these organic derivatives in inevitable and seems probable.

So I'd like to know, what are the long-term dangers of soluble oil components and the density and diversity of the inverter community in the harbor? Thank you for this opportunity.

Response GP294-1

The chemical properties and mechanisms of oil impacts on animals are described in Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*. The primary impacts on animals from exposure to oil would occur through direct physical contact and chemical mechanisms as well as through chronic or more persistent mechanisms if a prolonged exposure occurred. These mechanisms are summarized in Table 4.7-1, *Chemical Properties and Mechanisms of Impact on Plants and Animals*. Discussion of impacts on invertebrates is found throughout Section 4.7.

Refer to the Master Response for Oil Spill Modeling Methods.

GP295, **Graham, Bill**

Comment GP295-1

Good afternoon. I'm Bill Graham, and I live in Ocean Shores. I've been so happy to be able to live here for the last four years and blessed in an area that seems to me, obvious this afternoon, over a dozen unmitigatable conclusions reached in testimonies.

My original concern was for the nonvolatile components, the horrible stew that the crude oil from that portion of the Plains in the Dakotas has in it both organic and inorganic. It's basically in the EISs unstudied, unmodeled, the number of things of which we're dealing with.

And I hope you reject this. It's just too great. I just don't think it would be wise in any way to accept at this time with what we know about this substance into this pristine harbor.

And I was so happy to hear this young person who spoke and lots of people in between. Most of them getting younger than I am every day, I think. So I want to read a couple of stanzas from my favorite poem.

Maggie, and Milly, and Molly, and May went down to the beach to play one day. And Maggie discovered a shell that sang so sweet that she couldn't remember her troubles.

And Molly befriended a stranded star whose rays five languid fingers were.

And Molly was chased by a horrible thing which raced sideways while blowing bubbles.

And all of these things will be lost to the young generation.

Response GP295-1

Comment acknowledged.

GP296, **Graham, William**

Comment GP296-1

I came in the fall of 2011 as a trailing spouse. My mother-in-law's declining health was no longer remediable from a distance, and we moved here for support. I had long wanted to retire in a verdant and healthful climate such as came to me. I am committed—if the area avoids further deterioration of its natural benefits—to living a productive engaged life here in Gray's Harbor.

The proposals by Imperium and Westway are more than disappointing. Even a brief scan of the large documents shows several "show stopper" conclusions that cannot be supported. The obvious inadequacy in the route of rail transport amazes me. The condition and location of the oil route makes it unusable. This is too obvious to need detailed documentation. The bridges and bed of the rail nearly require tipping, spillage, or worse--ignition and probable explosion.

Response GP296-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP296-2

The core parameters of the GNOME modeling are poorly chosen. Many vital parameters are missing from this EIS. These this do not account realistically for drift, deposition, decay or permanence in the bay. Thus, the EIS addresses environmental impact in language but not with facts or data. The scope of needed mediation is missing or inadequate, perhaps based on unavailable or underutilized data. Many issues suggest the impossibility of mediation. Throughout the DEIS regulatory minima are used as target goals by the companies. In lay terms they seek the necessary, not the desirable. For example, geological phenomena natural here—earthquakes and resulting tsunamis—are dis-considered in the construction of piping, tanks, valves, and processors in the tank farms. Is this not offloading external cost from Westway or Imperium onto tax payers in Hoquiam, Aberdeen, and Gray's Harbor?

Response GP296-2

As noted in Draft EIS Chapter 4, *Environmental Health and Safety,* oil spill modeling was completed to provide information about the potential movement of spilled oil for a subset of the risk scenarios

addressed in the risk assessment based on conditions that could occur within the study area. The consequences associated with any single scenario would vary depending on the conditions at the time of an incident. Refer to the Master Response for Oil Spill Modeling Methods for a discussion of the assumptions, methods, and limitations of the oil spill modeling. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami.

Comment GP296-3

The tides in the harbor are incorrectly modeled. The seven rivers that flow into Gray's Harbor produce, even in summer, a net outflow. The 4-6 knot tidal bore is well known. Why have these extremely vital data been modeled with disregard?

Response GP296-3

Oil spill modeling requires consideration of wind, tide, and other site-specific environmental factors that influence the trajectory of oil after a spill. GNOME uses Location Files that contain site-specific information about the area being modeled. This modeling effort used a Location File that contained information about Grays Harbor. GNOME Location Files are prepared by the National Oceanic and Atmospheric Administration and contain prepackaged tide and current data based on historical data. According to the GNOME User's Guide, each Location File contains generalized information about the tides, currents, and shorelines in the region it covers. For most parameters (e.g., currents), the location files use averages of historical data. Although actual conditions may vary from historical averages at any particular time, the use of the location file is the most reasonable approach to representing conditions in Grays Harbor. For additional information about the approach, assumptions, and limitations, refer to the Master Response for Oil Spill Modeling Methods.

Comment GP296-4

Oil spilled in the terminal area will travel into all bays. Have the influences of such distillates and carried constituents been assessed with regard to adsorptive permanence?

Response GP296-4

As discussed in the Master Response for Oil Spill Modeling Methods, Draft EIS Appendix N*, Oil Spill Modeling*, provides information about the weathering behavior of these types of oil in the environment. Appendix N presents a comparison of the behavior of the medium crude oil proxy, Bakken crude oil, and diluted bitumen in the environment, which was competed using ADIOS.

Comment GP296-5

The tank cluster will be kept at the top of the bay. Have the latest Cascadia Subduction Zone models been incorporated with regard to damage from tank rupture or destruction from the likely scenario?

Response GP296-5

Refer to the Master Response for Seismic Risk and Design Requirements for a description of the earthquake source model and hydrodynamic modeling method used in the site-specific tsunami analysis conducted for the project site and presented in Draft EIS Appendix C, *Tsunami Impact*

Modeling and Analysis. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP296-6

Are Westway's and Imperium's placing of all external costs onto tax payers as an unfunded mandate legal? For these general reasons and many more detailed ones, I request the permits be denied.

Response GP296-6

The commenter does not provide sufficient information about how external costs are placed on taxpayers to allow for a response. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP297, **Graham, William**

Comment GP297-1

I came in the fall of 2011 to Ocean Shores as a trailing spouse. My mother-in-law's declining health was more demanding, and we moved here for support of her. I had long wanted to retire in the verdant and healthful climate of the Pacific Northwest. Then the chance came to her son, my spouse. I am committed—if the area avoids further deterioration of its natural benefits—to living a productive engaged life here in Gray's Harbor. My resources will be spent here where I remember that the term "Pacific Northwest" means to most people "cleanliness," a place where wealth is measured many ways.

The proposals by Imperium and Westway are disappointing. A brief scan of the large documents shows several "show stopper" conclusions that cannot be supported.

The obvious inadequacy in the route of rail transport amazes me. Along the ineffably sensitive Columbia, Chehalis River, and at last the Hoquiam River these plans mandate passage of hypo-insured oil tank cars. The condition and route of the oil route makes it unusable. The redundancy in the many descriptions of bridges, weak railbeds, and slumping hillsides threatening the track precludes needs for mention again here. The bridges and bed of the rail nearly require tipping, spillage, landslide overturns, or worse--ignition and probable explosion within the waterway itself. The Dakotan volatiles make this inadequately stabilized oil product yet more polluting and incendiary when shipped in moving vehicles. Velocity itself we review,is the largest factor in force (Force = Mass * Velocity^2), is idealistically one to avoid when transporting explosive masses.

Response GP297-1

Refer to Response to Comment ~~GP297~~GP298-1.

Comment GP297-2

The core parameters of the GNOME modeling are inappropriately chosen. Many historically considered and vital geo- and biological parameters are missing from these EISs. These this do not

account realistically for drift, deposition, decay or permanence in the bay. Thus, these EISs addresses environmental impact in language but not with historical, bioassayed, relevant data. These data bend heavily to those regarding appearance rather than ecosystem deterioration.

The scope of needed mediation is missing or inadequate, perhaps based on unavailable or underutilized data. My amateur scan of government data banks and reports (many machine readable) reveals many data available appropriate to the analysis of poisons and flows in Gray's Harbor. Several great failures in this model are clear.

- Only Gray's Harbor is modeled. This is inadequate given historical events and spills here.

As Appendix N-1 states we must assume that "the NOAA Grays Harbor Location Files used in the GNOME trajectory analysis were developed to address hydrodynamic conditions within the harbor and are not meant to model accurately the movement of oil outside of Grays Harbor."

- The channel rather than shellfish and other invertebrate habitats of interest to prey organisms such as migratory waterfowl is emphasized. Again N-1 states the NOAA Grays Harbor Location Files "are limited to the geographic extent of the Location Files when, during an actual spill, oil could continue to spread over time and travel beyond the immediate vicinity of the harbor depending on the existing current and wind conditions at the time of the spill." The files were developed earlier and used, though they fail to extend to concerned areas of the harbor.

- Flows are not based on historically available data from the seven rivers into the harbor although the ADIOS attempt at approximation and amelioration is applied. One must question why accuracy has been sacrificed for research efficiency. Flows are chaotic and weather-dependent. Rivers are short and periodic, though viable in all season. Modeling these conditions demands greater care than that applied in each EIS.

Some issues suggest the impossibility of mediation, though appropriate longer-term analysis could very well dispel such objections. But one would be wise to believe that destruction of the basis for healthy diversity in reproducing populations is at risk because of these contaminants. Current data suggest the likelihood of irreversible permanent damage.

These seeming irregularities suggest questions.

1. Why are the data for drift/trajectory and downward migration not applied to the North Bay? The movement of water in the channel is emphasized, but both outflow and water speed are not as observed in modern times. The figures are wrong so the model is useless. Why are incorrect and inadequate data accepted for modeling water related parameters?

2. Why are spills emphasized over the more damaging chronic leakage? Oil cars, tanks, pipes and valves are all human monitored in part—even if remotely aided—and inevitably drip. They drip and have accidents without human operation too. Our rail lines are outlined in spilled contents as even a short stroll with interest will make clear. Runoff to North Bay and the Southern Elk and John's River embayments is vitally damaging. Why are long term effects on invertebrate prey populations in the visible periphyton and psammon communities of these commercially important estuaries unmodeled?

3. Why are the long term effects within the photic and aphotic zones not compared? The smell of rotting biomass via anaerobic decay caused by inorganic and organic ingredients in crude oil is inevitable. Data modeling could provide instruction. Has anaerobic decay caused by these spills been considered?

For these general reasons and many more detailed ones, I request the permits be denied.

Response GP297-2

Most parameters in the GNOME Location Files are based on historical averages and therefore use of the Location Files is considered appropriate for representing conditions in Grays Harbor for the purposes of the EIS. The oil spill model is not designed to identify potential impacts on individual species such as invertebrates but rather to track potential trajectories of oil spilled in the harbor. The results of the model were then used to describe in general terms the types of impacts that could affect animals, plants, and other resources, as described in Section 4.7, *Impacts on Resources*. Specifically, Section 4.7.1.3, *Animals*, describes impacts on invertebrates from oil in the water column and along the shoreline. Appendix M, *Risk Assessment Technical Report,* Section 5.2.1, *Spill Sizes and Release Probabilities*, notes that overall oil spills into the waters of Grays Harbor have been infrequent and small (Table 11, *Estimated Quantity of Oil Reported Spilled in Grays Harbor*). Between 2007 and 2014, an average of 112 gallons of oil per year was released into Grays Harbor based on U.S. Coast Guard data. Refer to the Master Response for Oil Spill Modeling Methods.

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses the impacts associated with routine operations, including the potential for spills and leaks. As noted in Section 3.3, *Water*, the potential for impacts associated with such spills would most likely be minimized by containment features and best management practices. The potential for widespread environmental damage related to the risk of oil spills, fires, and explosions is addressed in Chapter 4, *Environmental Health and Safety*. As noted in Chapter 4, spill scenarios include the release of up to a specified volume of oil, meaning that smaller spill volumes are included in the assessment of risks.

Refer to the Master Response for Purpose and Focus of the EIS.

GP298, **Grant, Brenda**

Comment GP298-1

Imperium and Westway proposed oil-by-rail terminal projects
Public Hearing, October 8, 2015
Aberdeen, WA

My name is Brenda Grant
I live in Aberdeen.

I'm a family doctor in Aberdeen and I'm particularly worried about the health risks the oil trains pose to Aberdeen and other communities along the rail route.

The Draft Environmental Impact Statement predicts that a medium pipeline or storage tank spill will occur once in 1,100 years. It further predicts that a large spill will occur once in every 22,000 years. But human error was to blame for 30% of the 1,193 spills that happened on the west coast in 2014. These predictions grossly underestimate the probability of an accidental spill, whether at the terminal or along the rail line.

Bakkan crude oil has been shown to have a high percentage of Volatile Organic Compounds like benzene and xylene, making it flammable at lower temperatures and more combustible. When tank cars have ruptured during derailments these gasoline-like volatiles have exploded.

Railroad employees report that the rail industry has resisted a range of safety, staffing and track and equipment monitoring programs that could improve safety. The Washington State Council of Firefighters takes an official position opposing the shipment of crude oil by rail.

History shows that the handling of crude oil produces accidents, fires and explosions. The question is not WHETHER major accidents will happen, only WHEN and how often. The oil industry's record in recent years strongly supports this observation.

The Draft Environmental Impact Statement does not mention that when spills and derailments happen people will burn and die. The probability of this is high. A train of more than 100 cars, carrying three million gallons of a highly combustible product, traveling through population centers, is a public health catastrophe waiting to happen.

How would the damage of burn injuries and death be mitigated?

In my opinion the permits must be denied because the risks to human health are too great.

Response GP298-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or within Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur by an oil spill, fire, or explosion.

GP299, **Graser-Lindsey, Elizabeth**

Comment GP299-1

Please deny the Westway and Imperium EISs. The environmental effects of new fossil fuels is devestating directly and thought global climate change which is causing local problems such as decreasing snow pack and increasing summer drought and increasing temperatures.

Response GP299-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP300, **Greef, Fred**

Comment GP300-1

Westway and Imperium Draft EIS Comments

Thank you for this comment opportunity. Both of these DEIS documents are very weak and fail to meet some basic SEPA EIS requirements. They fail to inform agency decision makers, and the

majority of those citizens of this state who are most at risk, of many of the worst case impacts of both of these proposals.

The scope of significant impact consideration is far too narrow in geographic area, largely misses some significant impacts, and fails to provide adequate detail or worst case scenarios for others. No reasonable alternatives are considered or even dismissed with any explanation. No alternatives besides the no-action were considered. There is no EIS summary for either document that meets the SEPA rule requirement at WAC 197-11-440(4).

There are many uncertainties, but there are also acknowledged significant potential impacts, and the level of detail of impact analysis is not commensurate with the potential impact scale or even the location of most of the worst potential impacts (WAC 197-11-402(2)). The documents are poorly constructed (especially the missing summary) and weak in assessing some major impacts. This makes it hard to understand the effectiveness of any proposed mitigation, or the full consequences of moving forward with either of these proposals. The narrow geographic realm of impact consideration violates WAC 197-11-060(3)(a) and (b), (4)(d) and is one of the biggest flaws. There are also violations of WAC 197-11-080, WAC 197-11-330, WAC 197-11-402, WAC 197-11-440, WAC 197-11-660, and WAC 197-11-792. Both DEISs fail to adequately consider significant impacts as required under WAC 197-11-330(1)(b), and 330(3)(a), (3)(e)(i), (3)(e)(ii), and (3)(e)(iv). WAC 197-11-960 should be used to help determine significant impacts to all environmental elements. Impacts at WAC 197-11-960 Part B (2, 5, 7, 8, 12, and 14) were missed. Missed and weakly assessed impacts of most significance are discussed below.

Response GP300-1

As summarized in Draft EIS Chapter 3, Section 3.0, *Introduction*, Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses potential impacts from construction and routine operation of the proposed action. Increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) with the potential to result in the release of crude oil are addressed in Chapter 4, *Environmental Health and Safety*. The resource areas considered include those listed in WAC 197-11-960, Part B.

For more information about the scope and approach to the analysis presented in the Draft EIS, including the reasons the analysis of impacts in the extended study area are addressed qualitatively, refer to the Master Responses for Purpose and Focus of EIS and Geographic Scope of the EIS.

Refer to the Master Response for Environmental Health and Safety Analysis for a discussion of the risk scenarios evaluated in the EIS, including the definition of a worst-case discharge.

Comment GP300-2

WAC 197-11-060(3)(a) says that agencies shall make sure that proposals are properly defined. Both proposals are poorly defined. WAC 197-11-060(3)(a)(iii):

(iii) Proposals should be described in ways that encourage considering and comparing alternatives. Agencies are encouraged to describe public or nonproject proposals in terms of objectives rather than preferred solutions.

These proposals may be largely private but were not well defined, and not properly scoped. The scope of analysis for both EISs missed proposal components, alternatives, and impacts. The Westway proposal only offers a preferred solution. WAC 197-11-060(2)(c) says the scope must

meet WAC 197-11-792 (Scope). WAC 197-11-792(2) says the scope must consider three types of (a) actions, (b) alternatives, and (c) impacts. The three action types include single, connected (Imperium and Westway proposals), and similar action types, such as the current Tesoro/Savage proposal at the Port of Vancouver, and the Shell refinery proposal at Anacortes. These were not considered or acknowledged as having similar impacts. Both EISs missed an adequate assessment of widely known similar current actions, and obviously cumulative, and highly significant potential rail transport-related impacts. The three impact types required in EIS analysis at WAC 197-11-792(2)(c) include direct, indirect and cumulative impacts.

The EIS requirements at WAC 197-11-792(2)(b) for alternative consideration include a look at other reasonable courses of action and mitigation that is not part of the proposal. This was simply not done in either EIS. Other reasonable alternatives besides the no-action, and reasonable and effective mitigation options that actually address most of the significant impacts were not adequate, partly because proposal parts and impact types were missed. I will specify a few reasonable alternatives and reasonable mitigation options below that should be considered.

Response GP300-2

Refer to the Master Response for Project Objectives and Alternatives for a discussion about the basis for selecting alternatives to be evaluated in the EIS.

Refer to the Master Response for Connected or Similar Actions and Cumulative Impact Analysis for a discussion of the approach to considering other similar projects in the EIS.

Refer to the Master Responses for Purpose and Focus of the EIS and Geographic Scope of the EIS for a discussion of the scope of the EIS, including the reasons the potential impacts in the extended study area were evaluated qualitatively.

Comment GP300-3

WAC 197-11-440(4). EIS summary

Neither EIS provides the EIS summary required for a SEPA EIS. The failure to look at reasonable alternatives (WAC 197-11-786) and effective reasonable mitigation is likely associated with the failure to meet some of the EIS summary requirements and the failure to properly describe the proposals (objectives, and purpose and need) as required at WAC 197-11-440(4), and (5). One "objective" was found in the Westway proposal "executive summary":

The objective of the proposed action is to expand the existing bulk liquid storage terminal to receive crude oil by train, store the crude oil, and load crude oil onto tank vessels at the Terminal 1 dock for shipping to refineries on the West Coast and potentially abroad.

This single objective is actually the preferred solution. Perhaps the "objective" represents the proposal purpose? If so the proposal objectives, and the underlying proposal need are still missing. This violates the EIS summary requirements at WAC 197-11-440(4) and unfairly restricts alternative considerations.

Response GP300-3

As noted, Draft EIS *Summary* identifies the project objective. Final EIS Chapter 2, *Proposed Action and Alternatives*, has been revised to more clearly highlight the objective of the proposed action,

including the purpose and need to which the proposal is responding consistent with WAC 197-11-44-(4). Refer to the Master Response for Project Objective and Alternatives for additional information about the consideration of alternatives in the Draft EIS.

The Final EIS and Summary have also been revised as discussed further below.

As noted in Draft EIS, Chapter 3, Section 3.0.5*, How was mitigation identified*? mitigation measures are considered when applicable regulations, permit conditions, and required plans do not adequately reduce potentially significant impacts. Refer to the Master Response for Mitigation Framework for additional information about the development, implementation, and enforcement of mitigation measures.

Comment GP300-4

Other required EIS summary components are also largely missing. The extent to which other required EIS summary parts have been partially addressed is difficult to determine because they are not summarized anywhere. They are hard to find, and widely scattered over 66 pages. This fuzzy 66-page "executive summary" does not much help decision makers or the general public. The required brief EIS summary was also not included in the cover letter, fact sheets, the introduction, or anywhere in chapters one or two.

The Imperium EIS is also missing an EIS summary meeting WAC 197-11-440(4):

"The EIS shall summarize the contents of the statement and shall not merely be an expanded table of contents. The summary shall briefly state the proposal's objectives, specifying the purpose and need to which the proposal is responding, the major conclusions, significant areas of controversy and uncertainty, if any, and the issues to be resolved, including the environmental choices to be made among alternative courses of action and the effectiveness of mitigation measures."

The Imperium "executive summary" is 69 pages and still misses the same requirements, but the "objective is better stated and thus a bit more useful. There is no proposal purpose, or statement of the proposal's underlying need, or a statement of the proposal objectives. These are also absent in the cover letter, fact sheets, the introduction, and in chapters one and two. The other EIS summary requirements are also difficult to find and never summarized in the 69 pages, even though the word "summary" is in the header of all of those pages, just as with the Westway proposal. Executives and public need a summary, not a 66 page fuzzy document missing many requirements and never summarizing things.

Response GP300-4

Consistent with WAC 197-11-440, the Draft EIS *Summary* includes a discussion of the project objective, significant areas of concern, and major conclusions. A brief project description is included in the Draft EIS Cover Letter, Fact Sheet, and Summary. Final EIS Chapter 2, *Proposed Action and Alternatives*, reflects the addition of the project objective, specifying the purpose and need to which the proposal is responding. For additional information about the proposed action's objectives and the consideration of alternatives, refer to the Master Response for Project Objective and Alternatives.

Portions of the comment specific to the REG (formerly Imperium Terminal Services) Expansion Project would be addressed in responses to comments as part of the Final EIS for that proposed project.

Comment GP300-5

Alternatives

Please add reasonable alternatives and reasonable mitigation to these EISs. The failure to meet SEPA rule EIS summary requirements leaves us little basis for creating reasonable alternatives or reasonable mitigation, or for objectively assessing relative merits of alternatives. The EIS Summary failure is thus a serious flaw, but it should not be used to justify not looking at any other reasonable alternatives or reasonable mitigation. I would suggest that the real proposal purpose (for both proposals) was something like "storage capacity expansion" to meet the underlying need "oil-related business growth at the Port of Grays Harbor in Hoquiam."

Alternative modes of delivery and alternative oil-related fuel products would meet the proposal need. These include pipeline, trucking, or boat/tanker product transport alternatives and less volatile and explosive products as mitigation. These are far safer with less severe potential environmental consequences to the most sensitive resources, but were not offered as alternatives or as mitigation measures. WAC 197-11-786 says reasonable alternatives must at least approximate the proposal objectives at a lower environmental cost. It is hard to approximate those objectives when they have not been shared. No reason was provided why any alternatives were dismissed or even whether any were considered. Choosing not to share the proposal purpose and underlying need, or list of proposal objectives with the public or decision-makers is not enough reason not to consider reasonable alternatives and lower environmental impacts, especially when potential impacts are so large. WAC 197-11-440(5)(b):

(b) Reasonable alternatives shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation . . .

Other oil delivery modes meet the reasonable alternative test of lower environmental cost to those elements of the environment most at risk of significant impacts statewide from the oil trains. The potential significant impacts of oil trains are simply too large to ignore without any reasonable alternative consideration and with very little effective mitigation consideration. The scope also largely missed the statewide oil train impacts of largest significance. Too many human lives are potentially threatened statewide by the oil trains not to consider other transport modes, and safer oil products to address the most significant likely potential impacts.

The imperium "objective" statement is more useful than the Westway statement at fostering alternatives, since it does not limit oil delivery to trains. It more closely meets the WAC 197-11-440 requirement for the proposal "purpose," and does seem to allow for multiple oil delivery alternatives and mitigation options. Imperium "objective":

The objective of the proposed action is to expand the existing facility to receive and load bulk liquids in addition to those already permitted.

Unfortunately reasonable alternatives were not proposed for this EIS either. The stated objective does not specify rail transport, but the facility currently uses rail transport, the largest share of the new liquid storage capacity is anticipated to be unit-train delivered Bakken or Alberta crude oil, and rail construction is part of the proposal, to accommodate this large increase in rail transport. Statewide unit train crude oil transport is a fully anticipated and major part of both proposals for EIS consideration based on WAC 1097-11-060(3)(b). This is especially true because the direct,

indirect, and cumulative impacts of these trains are potentially huge and have never been looked at before in another EIS.

Alternative Suggestion: One more lower-environmental-cost EIS reasonable alternative may be to **not allow** Alberta oil-sand Bitumen shipments by rail as they are even worse environmentally than Bakken crude oil by rail. Alberta Bitumen formulations are also volatile and explosive, fumes are much more harmful to humans, has worse impact on fish habitat in Columbia River if it spills, creates huge amounts of high-sulphur petrolium coke waste from refineries (if refined on west coast), is even dirtier than coal and would have to be shipped overseas as a cheap coal substitute since it cannot be burned in US or Canada. We cannot block export of the bitumen crude either since it comes from Canada. We really do not want to deal with the waste product on our west coast. No good reason to send world's dirtiest petroleum products overseas through our state.

One other required form of reasonable alternative consideration is missing from both EISs:

WAC 197-11-440(5)(c) Alternatives

. . . (vii) Discuss the benefits and disadvantages of reserving for some future time the implementation of the proposal, as compared with possible approval at this time. The agency perspective should be that each generation is, in effect, a trustee of the environment for succeeding generations. Particular attention should be given to the possibility of foreclosing future options by implementing the proposal.

Since this WAC was violated, I propose adding an alternative or mitigation option that delays the Westway and Imperium approvals until at least one EIS takes an adequate look at all the worst case unit train impacts and includes at least some consideration of reasonable alternatives or reasonable mitigation measures. Then all the other proposals can incorporate that impact analysis by reference. Until that is done such impacts are largely unknown, although they are known to be potentially very significant.

You could delay the Westway and Imperium approvals, or delay EIS completion until EFSEC completes a likely more comprehensive EIS on the larger oil-train based proposal at the Port of Vancouver (likely covering oil train impacts statewide). The EFSEC EIS just came out and is not yet very good or adequate, but it is a more complete EIS and can still be fixed. Much impact analysis work might then be incorporated by reference to the extent that it better informs decision-makers and citizens of the true consequences of worst-case massive increases in unit train impacts, other indirect impacts, and also the smaller increases due to each single proposal's share of the explosion- and fire-prone volatile crude oil transport statewide. Some of the risk assessment is flawed still, but will likely be improved.

Response GP300-5

Refer to the Master Response for Project Objective and Alternatives for an explanation of the alternatives evaluated in the Draft EIS. Refer to the Master Response for Geographic Scope of the EIS for information about the analysis of impacts associated with rail and vessel transport in the extended study area.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action.

Portions of the comment specific to the REG (formerly Imperium Terminal Services) Expansion Project would be addressed in responses to comments as part of the Final EIS for that proposed project.

Comment GP300-6

Statewide Unit Train Impacts

This proposal is one of several current proposals that can cause very significant impacts if the full nature and extent of the most serious impacts is not first assessed and disclosed to the decision-makers and to all Washington citizens statewide who are most at risk. Decision-makers must know the full impact risks, so they cannot claim ignorance when the first disaster strikes. Ecology's March 2, 2015 Marine and Rail oil Transportation Study Rail, while flawed in several respects (discussed at the end), did say that oil train disasters cannot be prevented. SEPA is required to look at known, highly significant environmental impacts in an EIS before agencies can approve any of these dangerous crude-oil unit-train delivery proposals that will increase the risk of very significant impacts. The most significant impacts require the most extensive consideration in an EIS. WAC 197-11-440(5)(c):

(iv) Tailor the level of detail of descriptions to the significance of environmental impacts . . .

Cumulative unit-train impacts from the Westway and Imperium expansion projects (oil trains), Tesoro/Savage Port of Vancouver (oil trains) the Shell Oil facility proposal at Anacortes Washington (oil trains) and all other already known or highly likely current proposals in Oregon or Canada that are proposing unit-train crude oil transport through Washington, whether just through Spokane, Tri-Cities, and along the Columbia Gorge; or passing through Vancouver area, but heading to Oregon; or those heading north past Centralia to Tacoma or points north, must all be included as part of the cumulative impacts assessment for these two EISs. The Westway and Imperium proposals add cumulatively to the same Washington transport routes from North Dakota, and add to the risk of major disasters all along the way. Please at least expand the scope to look at the huge potential impacts at Spokane Valley, Spokane, and from there to Centralia.

This type of EIS assessment must occur before any of these proposals can be approved. One EIS could first take the broader look at these cumulative impacts and the rest could incorporate that analysis by reference. Until then, approval decisions for all these proposals must wait until the worst-case oil train impacts are known by the decision-makers and made public. These proposals must be properly defined as required by WAC 197-11-060(3)(a) and (b). This includes a look at all parts of each proposal. Explosive Bakken and Alberta crude oil rail delivery is part of both proposals and adds to the cumulative impacts of all other such current Bakken and Alberta oil by rail proposals. Please see WAC 197-11-060(4)(b):

(b) In assessing the significance of an impact, a lead agency shall not limit its consideration of a proposal's impacts only to those aspects within its jurisdiction, including local or state boundaries (see WAC 197-11-330(3) also).

Significant impacts beyond the arbitrary boundary of Centralia require much more extensive consideration in one or both of these EISs. Many potential rail transport impacts beyond the local boundaries of Centralia to Hoquiam are more significant than those that are more extensively assessed by these two EISs. WAC 197-11-330(3)(a) requires a look at other locations where the same proposal may have a significant adverse impact. The SEPA Responsible Official is also required

to look at the following factors when considering what impacts are significant under WAC 197-11-330(3)(e):

(i) Adversely affect environmentally sensitive or special areas, such as loss or destruction of historic, scientific, and cultural resources, parks, prime farmlands, wetlands, wild and scenic rivers, or wilderness;

(ii) Adversely affect endangered or threatened species or their habitat; and

…(iv) Establish a precedent for future actions with significant effects, involves unique and unknown risks to the environment, or may affect public health or safety.

The Columbia Gorge is an environmentally sensitive and special area that is extremely susceptible to oil train derailment impacts. It is the primary source of threatened and endangered chinook salmon, sockeye salmon and sturgeon and their habitat, and vast world-class scenic recreation and fishing opportunities. The DEIS for Tesoro/Savage, Port of Vancouver proposal suggests one oil train derailment is likely along the Columbia River every two years form its proposal alone. I think their calculations greatly underestimate the frequency of severe oil spills/fires/explosions, especially if other proposals such as Westway or Imperium are also approved. They have also severely underplayed the environmental significance of oil spills in the 216 mile Columbia River Allignment from Pasco to Vancouver.

Westway and Imperium might be the first approvals that spur the growth of dedicated120-car volatile Bakken crude oil unit-trains in this state. Please add this additional risk to the assessment of both EISs. This indirect impact of spurring more unit train traffic must be looked at as required under WAC 197-11-330(3)(e)(iv) and also under WAC 197-11-060(2)(c). This includes added potential significant impacts to the Columbia Gorge, T&E salmon and sturgeon, farm goods transport, and human lives and air quality impacts statewide, if these are some of first potential oil-train dependent proposal approvals. The first approval(s) will not only bring more dangerous oil trains through our state, but will likely establish a precedent for more growth in oil train traffic as well. All of these trains, whether just those from this proposal or from the precedent these proposals establish, will threaten the public health and safety of many more Washington residents than just those living between Centralia to Hoquiam.

Please add to the EISs an assessment of worst case impacts of major derailments, fire and explosions to at least a worst case sample of the many Washington towns that are much more at risk of larger disasters than Centralia or Hoquiam. Consider train speeds, topography, larger populations close to the rails, and also sole source aquifers, other sensitive resources, etc. that might help screen for examples of the worst case impact locations. Spokane, Spokane Valley (Sole source aquifer easily penetrated and contaminated by a Bakken crude spill), Tri-Cities, Cheney, Stevenson, Bingen, Camas or Washougal, and many other small towns where the trains do not slow as much come to mind. Some of the small towns along the Gorge such as Stevenson are at very severe risk due to proximity of the tracks and adjacent topography.

Additional EIS analysis is needed for potential significant direct or indirect oil train impacts to the following resources from the Westway and Imperium proposals

Columbia River Salmonids and Sturgeon] (T&E fish) and habitat impacts for both crude oil types

Transportation ---E. Washington farm produce transport impacts all the way to ports and ships

Recreation---Columbia River fishing and recreation impacts

Env. Health Hazards---fires and explosions in large and small towns along all Bakken crude rail lines---potential for vast losses of human life and property

Air Quality
• Canadian (Alberta) oil-sand bitumen impacts on GHG emissions and climate change due to petroleum coke use as a low grade, high-sulphur, cheap coal substitute if exported.

• Train diesel engine exhaust and PM 2.5 one-hour national ambient air quality standard & possible CO standard violations also in Spokane, Seattle, Vancouver, Yakima, and Columbia Gorge neighborhoods near the tracks. Emission factors, pilot studies, and monitoring records must be disclosed to assure humans will still be protected by the total increases in giant dirty diesel engines moving slowly through residential neighborhoods.

See: Diesel particulate matter emission factors and air quality implications from in–service rail in Washington State, USA, by Daniel A. Jaffe, Atmospheric Pollution Research 5 (2014) 344-351. He said a 50% increase in unit train rail traffic in Seattle could cause a national ambient air quality PM 2.5 air quality violation. The Anacortes proposal alone might be a 40% increase. More studies are needed before there is any increase, especially a 700% or 1000% increase. We also need to be sure all these trains replace all their engines with the new far cleaner diesel engines before any increased unit train traffic is allowed. Diesel emissions are very toxic. These levels kill elderly folks and those with compromised health. How many people are we killing without even spilling the oil? The EIS should do this kind of public health impact assessment. That is why we have air quality standards. Ecology has some top notch air quality modelers in their Air Quality program that can and should do some diesel railroad engine emission calculations based on the worst case number of increased unit train traffic over the next 10 years before we allow the traffic to increase.

Response GP300-6

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*, which presents a cancer risk analysis from emissions of diesel particulate matter in the study area related to proposed operation.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions (no-action alternative), and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment GP300-7

A broad EIS look at explosive unit-train impacts statewide has never been conducted. This is needed before the individual contributions statewide from each separate proposal can be understood. The March 2015 Rail Safety Study was very weak and falls far short of the SEPA analysis required for these two EISs. (See that discussion towards the end of these comments.) Piece-meal analysis of each separate proposal is not allowed until at least one EIS takes a broader look at all the cumulative impacts from current similar contributory proposals, before any proposal can be approved. WAC 197-11-060(3)(b) requires each proposal with an oil train component to look at the complete interdependent oil train transport part, since you will not have the dangerous oil trains without these oil transport proposals. These oil-train dependent proposals are directly responsible for and are the cause of increases in oil train disaster risks. These are the most significant potential impacts. Worst-case scenarios must be looked at beyond the Centralia region in these EISs as required under WAC 197-11-080(3)(b).

Please add the worst-case total cumulative increases in unit train traffic across this state, and the resulting indirect impacts to farmers and their produce transport to at least one of the EISs before we approve any new or expanded oil train facilities.

Include the additional cumulative unit-train rail traffic impacts associated with the current coal port proposals in Cherry Point, and the Millenium Longview proposal as part of the total projected increase in rail traffic statewide. Assess the cumulative total impact on farm produce transport and the likely impact of train derailments caused by sulphuric acid damage to railroad ties. Coal unit trains and oil unit trains both compete with eastern Washington farm produce transportation (SEPA checklist questions B-14-g, and h). Farm produce hauling via trains is the cheapest option for farmers and any loss of train access due to the unit train transport across our state effects the success of eastern Washington farmers getting their goods to ports.

Response GP300-7

Draft EIS Chapter 6, *Cumulative Impacts*, addresses cumulative impacts in the study area. Refer to the Master Response for the Cumulative Impacts Analysis for an explanation of the projects considered in this analysis. Regarding the geographic scope, refer to previous response.

Comment GP300-8

Coal trains spill huge quantities of Montana Powder Basin high-sulphur coal dust which then forms sulphuric acid and rots the ties. This common cause of train derailment can cause the Bakken oil trains to derail and explode. Please assess this increased risk or if unknown include a worst case derailment factor in both EISs due to rotten ties. Any increased likelihood of major disasters should be looked at, especially since UTC says they do not have enough rail inspectors, and the railroads will not commit to adequate rail inspections either.

Response GP300-8

Refer to the Master Response for Geographic Scope of the EIS.

Comment GP300-9

Please add origin locations, all train routes, and all destinations and all Washington town names near any of these rail routes for an adequate SEPA EIS cumulative effects analysis of unit train impacts. This information should be readily available for both proposals.

Response GP300-9

Final EIS Chapter 5, *Extended Rail and Vessel Transport,* reflects additional information related to the likely sources of crude oil under the proposed action and the assumed routes. Chapter 5 addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP300-10

Please add the maximum likely total of unit trains per week of Bakken crude versus Alberta oil-sand bitumen, versus coal, at least along all lines that might supply these two proposals. Please also include the nature of all possible Bakken oil train shipments in terms of flammability, explosiveness, and all of the likely train transport formulations, and assess the transport risk of each. Some formulations may provide reasonable mitigation measures or lower environmental cost alternatives to reduce the severe risks by first treating the Bakken crude in North Dakota to reduce flammability and explosiveness prior to rail transport.

Please be sure to also disclose the volatility, fumes, and properties of all potential formulations for Alberta oil-sand bitumen which requires dangerous volatile additives to dilute it. The fumes are more harmful to people than Bakken crude, the high risks of fire and explosion are similar, and consequences to the Columbia River fish habitat than with Bakken oil spills are potentially worse. These oil properties require disclosure due to the likely potential impacts to threatened and endangered fish species. Bakken is more soluble and easily dispersed. The Alberta Bitumen crude clings more to sediments and likely disrupts more T&E fish habitat.

Response GP300-10

As noted in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, such plans are not required prior to operations and have not been developed. However, once the plans have been submitted to Ecology, such as the contingency plan required by WAC 173-186, they will be available for public review and comment for a period of 30 days. Refer to the Master Response for the Purpose and Focus of the EIS.

To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP300-11

Please document the worst case potential impacts to all the small towns, cities, citizens closest to the rail lines, and those citizens and communities most at risk and why. This is not rocket science, but is

a required part of SEPA public disclosure when the potential disasters are so huge to so many of our citizens and to the environment along the Bakken crude oil train routes.

Response GP300-11

Refer to the Master Response for Oil Spills, Fires, and Explosions and the Master Response for Risk Assessment Analysis.

Comment GP300-12

What does a 300 foot high fire ball or an explosion involving multiple rail cars do to a suburb of Spokane such as Spokane Valley? What does a major explosion do to a smaller but moderately populated residential area? Quebec was really lucky the town was so much smaller and only 47 people died. Worst case impacts to many Washington towns are far more severe and SEPA requires such disclosures at WAC 197-11-080(3)(b).

A good map is crucial, with all of the most likely rail routes and towns for Canadian bitumen, Bakken crude, and coal, both separate and overlaid. Both proposals say oil train transport of Alberta oil-sand bitumen is a likely potential part of their total proposal and there are currently at least two major coal unit-train proposals.

Response GP300-12

Comment acknowledged.

Comment GP300-13

Please verify how many unit trains might pass through Spokane, Tri-Cities, Columbia Gorge, and Yakima each day, or at least all towns with Clean Air Act State Implementation Plans resulting from poor air quality, and any towns where air quality pilot studies or air quality monitors have been studying train related emissions. Decision makers and the public need to know the latest science on large increases in large diesel engine traffic through any residential areas already known for poor air quality. Projected increases in train traffic caused by these proposals, or resulting indirectly from these proposals, or adding to existing cumulative air quality problems, may violate the Clean Air Act in some neighborhoods. Please model worst case projected diesel emissions from total projected increases in unit trains to prove that large increases in unit train traffic will not cause Clean Air Act one-hour violations. This is an indirect and a cumulative impact, but it must be considered under SEPA especially since people die from these Clean Air Act violations. The study in Seattle (cited above) indicated violations are likely.

Please also verify name **all** the small towns oil unit-trains will pass through, at what speeds, and where the speeds will be up to 40 MPH along the Gorge, or near any small towns. Show the small towns along the train routes and show all locations where trains are allowed to run at speeds of 40 MPH or more. This should also be combined with topog maps showing potential consequences of steeper downhill or uphill topography near the tracks. This will help determine where train cars could roll down steeper grades or into big rocks if they derail. These maps will help calculate many of the worst-case derailment locations, or areas along Columbia River where whole trains could be pulled in with massive spills. Larger cities may have larger emergency response capability than the small towns. All citizens along the tracks must be told the increased risk of getting blown up or burned up by the volatile oil. Since this information may not be known but is not costly to obtain, it

must be included in the EIS because it is essential to understanding where the most significant potential impacts might occur.

Response GP300-13

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP300-14

Environmental Health Impacts (SEPA checklist questions B-7-a-4) and 5))

Please include percentage increase in risk from these proposals and from worst case growth in all proposals of fully dedicated Bakken oil train spills. Please also explain the risk of exposure to toxic chemicals, and the risk of explosions and huge fires to all of the many inhabited areas along the rail lines. The special emergency services (spill/fire/explosion) that will be needed by every town along the Bakken crude unit train rail routes through this state must be determined, discussed and acknowledged for each location. State what the biggest resulting consequences are for each representative major disaster worst case scenario.

The biggest problem locations and worst case impact scenarios should be used for disaster response planning and to determine mitigation needs. Spill, fire, and explosion response capabilities all along the rail routes must be determined not only for people but also for fish and fish habitat. Please include worst case disaster impact scenarios of spills of hazardous waste on threatened and endangered salmonids and sturgeon in the Columbia River for both Bakken crude, and for oil-sand bitumen. The likelihood for derailments down steep rocky embankments into the Columbia River, how many cars might get pulled in in worst case, and all of the dangerous locations and worst case scenarios along Highway 14 should be disclosed along the gorge since the risks to towns, fish, and recreation are greatest here. The warmer waters this last summer have already weakened fish populations. This additional cumulative effect to Columbia River fish populations must also be assessed as part of the cumulative effects to these threatened and endangered fish that might make them even more sensitive to oil spills.

The disaster in Quebec destroyed half the downtown, but only killed 47 people because it was such a small town. We have to consider how much worse the potential impacts might be to many of our larger. communities and whether any increased risk of such a disaster is acceptable.

Along the Columbia River and Columbia Gorge the steep topography and very narrow flatter zone along the river forces the rail lines to be directly adjacent to the small towns and Highway 14 and the River. A derailment there can destroy an entire town and its fire department with explosions and fire, and the primary access route (Highway 14) for any other emergency responders, and might also have a devastating impact on T&E salmonid populations, their habitat, and fishing recreational opportunities etc. Drive Highway 14 someday and see how close the rail lines are and how directly uphill from the River they are and how they are directly over large directly connecting water bodies to the river in many locations. The trains may go slow through Spokane, Tri-Cities and Vancouver. Please disclose train speeds in both EISs along all small towns and along the Columbia River to determine potential impacts. Please also disclose all track inspection status and maintenance records in the EISs in order for the decision makers to know the true risks of Bakken crude rail transport before deciding to add additional unacceptable risks. If not available worst case

assumptions (such as no inspections) must be assumed. SEPA impact analysis requires worst case assumptions when we do not know just how bad the impacts will be (See WAC 197-11-080(2) and (3)(b)). Let's look at the true impacts or the worst case impacts before we approve any increased risk of major disasters.

Columbia River T&E fish species are recently further at risk of extinction with the warmer water (possibly resulting from, or expected to worsen due to climate change), as evidenced by the large die-offs noted this last year to several species including sturgeon. There is already talk of removing the four lower Snake River dams to provide more salmonid access to cooler water in higher elevation Idaho streams. The impacts of worst case oil spills on Columbia River T&E fish populations, both Bakken crude and oil-sand bitumen from Alberta (which may cause a bigger fish habitat impact) should be added to both EISs. Use this same information to help assess fishing and recreation impacts along the Gorge. The tracks are right next to, and uphill from the river for many miles. Travel speeds along all those stretches should be calculated to help determine rupture potential in case of derailment

Oil train crashes with rupturing and or exploding oil cars would dump huge volumes of Bakken crude directly into the Columbia River since it is so close below and downhill from the tracks for so many miles. The worst case volume of oil entering the river must be calculated, because we know that even the safer model cars rupture in crashes of less than 40 MPH. The steep embankments and rugged rocky slopes directly down to the river from the tracks will not be gentle on the oil cars and could pull huge sections of unit trains and ruptured cars down into the river with massive explosions and spills.

Please determine relative impacts of oil-sand bitumen derailments and ruptures spilling into fish habitat, and the worst-case impacts to fish, fishing, and other recreation use of the scenic Gorge. The fish habitat impacts specific to a giant worst case influx of oil-sand bitumen to the Columbia River should be determined in the EIS. It sticks to the sediments in the river is likely more disruptive of T&E fish, fish habitat and fishing. How much fishing would be ruined? Some, worst case spill locations in terms of potential for most ruptured cars and most sensitive fish habitat reaches should be determined, especially if there are locations where whole trains may roll down jagged rocky slopes and get pulled into the river. When there are so many unknown factors SEPA requires worst case assumptions and maximum impacts to be considered. WAC 197-11-080(3)(b).

Response GP300-14

Draft EIS Chapter 4, *Environmental Health and Safety*, notes that the proposed action would result in a new potential for oil spills, fires, and explosions associated with unit train transport of crude oil in the study area. Final EIS Chapter 6, *Cumulative Impacts*, discusses the cumulative risks associated with the implementation of the proposed action in the study area. Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, includes a discussion of the type of impacts that could occur in the event of an incident involving the release of crude oil, including information about toxicity and exposure. For the reasons discussed in the Master Response for Geographic Scope of the EIS, impacts in the extended study area (i.e., on the mainline railroad throughout the state) are addressed qualitatively. Final EIS Chapter 5, *Extended Rail and Vessel Transport*, reflects additional information on risks under existing conditions, the no-action alternative, and the proposed action.

Comment GP300-15

Eastern Washington Farm Produce Transport Impacts

Very significant cumulative impacts have already started to hit Eastern Washington farmers, who cannot compete with the more lucrative unit train use of Washington railroads to get their crops to market, including the grain farmers on the Palouse. We cannot afford to limit the EIS to only a train delivery alternative for crude transport at expense of farming transportation losses.

Ecology's new SEPA checklist Question B-14-g requires consideration of impacts to agricultural and forest product transport conflicts. Grain farmers in the Palouse are already suffering from transport competition with the unit trains. Much grain has been traditionally barged on the Columbia from Lewiston area to Portland, but those barges to Portland or Kalama Washington are not cheaper than train cars and their days may be numbered. Please see Washington State University, Final Report TNW 2001-2006, Impacts of a Snake River Draw Down on Energy and Emissions, Based on Regional Energy Coefficients. Department of Agricultural Economics, W.S.U., by Trent Ball and Kent Casavant.

It is no longer economical to keep subsidizing the 4 lower Snake River dams that make barge transport possible, due to high maintenance costs that have been subsidized by taxpayers. If the dams are removed it will mean 80% more Palouse grain crops will need train transportation instead to get products to ports for export. Those transport problems do not stop in Eastern Washington either, but follow oil train use all the way to port and loading docks and dock-workers. Boat access and ship loading priority and shipping lane priority conflicts are all part of agricultural transport. Please assess the most significant cumulative and indirect worst case farm produce rail transport impacts attributable to the Westway and Imperium proposals, using the maximum worst case coal and oil unit-train growth numbers. How much more unit train traffic does it take to push our farmers out of business?

Many Washington farmers were adversely impacted by the dock-workers strikes on the west coast last year when much of their produce spoiled in shipping crates sitting on the docks waiting to load. Those losses might be assessed as one measure of potential impacts resulting from transport competition with oil trains.

Oil deliveries are not time sensitive. Crops spoiled in shipping crates during the dockworker strike last summer, and that devastated many Washington farmers. Agricultural transport impacts can occur all the way to the loading docks, ships, and shipping lane access and timing at the ports. These indirect, but cumulative oil train impacts must be assessed in at least one EIS before any of these proposals to increase and set a precedent for any more unit train use in this state is approved.

The number of farming jobs that, and might be lost in eastern Washington due to poor access to farm produce transport by rail (cheaper than trucking), and having to compete with the more lucrative oil trains can probably be calculated. This is an indirect impact that SEPA should look at since it is a result of transportation impacts to farming. Please contact the Washington State University economists cited above for help with any farm produce transport impact calculations. Qualitative if not rough quantitative significant adverse impacts to farm transport should be added to both EISs. The oil jobs may only last for 15 years, whereas the farming economy is sustainable if we do not allow big oil companies to displace it.

The cumulative unit train rail traffic impacts associated with the two large current coal port proposals in Cherry Point, and the Millenium Longview proposal should be considered to the extent that they also compete with eastern Washington farm produce transportation (SEPA checklist questions B-14-g, and h). All unit train increases hurt farm goods transport and the effects are cumulative. Farm produce hauling via trains is the cheapest option for farmers and any loss of train access due to the unit train transport across our state effects the success of eastern Washington

farmers getting their goods to ports for export. The worst case total cumulative likely increases unit train traffic and the resulting adverse impacts on agricultural transport across this entire state should be considered by at least one SEPA EIS before any of these proposals is approved. I do not know if this is a significant impact, but I think it is. It is one of the SEPA elements that must be considered. You will at least need to document why it is not significant if the economists at WSU think it is.

Response GP300-15

Refer to the Master Responses for the Purpose and Focus of the EIS. Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP300-16

Marine and Rail Oil Transportation Study (March 2, 2015)

The Governor's $300,000 rail car safety study is no substitute for a comprehensive SEPA EIS look at all the direct, indirect, and cumulative environmental impacts associated with vast increases in unit train traffic across this state. The rail study said disasters are inevitable, did not look at alternatives to rail transport, or even consider many potential risk prevention measures. It did not do a good or thorough assessment of worst case risk scenarios for all the communities along the tracks and the bigger risks along the Columbia Gorge. The primary focus was spill response, but that effort was also weak. A much better worst case look is required by a SEPA EIS when impacts are likely significant but largely unknown (WAC 197-11-080(3)).

Many rail transport spill prevention measures were ignored. Stronger rail cars were proposed for Bakken crude transport and certainly should be mandated, but they do not prevent ruptures and explosions of highly flammable and explosive Bakken or Alberta Bitumen crude at speeds of less than 40 MPH. They plan to go at least 40 MPH much of the time. Three of the primary authors of Ecology's "Rail Safety" study, David Hatzenbuhler, Robert G. Patton, Eric Lymanused of the Texas-based company MainLine Management—all held senior positions with Burlington Northern Sante Fe railroad company for decades. BNSF, has enjoyed large profit margins as a result of the oil boom, as one of its primary clients, at the expense of less lucrative clients such as Eastern Washington grain farmers and other Washington farmers.

It basically says there will be spills, they cannot be prevented, so all we have to worry about is emergency response and put a few cent tax on each barrel delivered to help pay a little bit of the spill response costs. It says there are currently about 19 Bakken oil unit trains per week and that current proposed terminals will increase that to about 137 or more. This would create more than seven times the current risk of a giant Bakken oil fire and or explosion disaster, or spill into the Columbia River. The Shell Anacortes proposal would add about 7 trains per week, a 40% increased risk of a giant disaster on route to Anacortes. Even that increase is probably not acceptable with so many lives at risk. The Imperium proposal might add 14 trains per week. This would be an 80% increased risk of massive death and environmental destruction. Westway would add about 9 trains per week which would be almost a 50% increase from the current 19 trains per week. The actual increased risks of a major disaster are probably much higher as I will explain below.

Please verify where these numbers came from, what assumptions were used, to verify the true worst cases. Were any likely proposals for Oregon ports missed that would also require Bakken unit train passage through Washington State and the Columbia Gorge? The lease for the giant Tesoro/Savage Port of Vancouver proposal allows them to build a second terminal if they exceed 400,000 barrels per day. This means at least 800,000 barrels should be used in the worst case EIS analysis. I think this is hidden in the new Tesoro Savage DEIS. I do not know what figure was used in Ecology's rail transport study. Trains/week is only a small part of the needed unit train impact analysis. Many other parts were also missing in the "Rail Safety Study," such as real prevention measures, alternatives, and many better mitigation measures.

I am also told that the current 19 trains per week from the rail safety study is a bogus number for risk comparison. Most of these 19 trains are not dedicated to oil transport. Instead they only have about 30-35 Bakken cars in one part of the train. The comparative risk of one part of the train derailing is much smaller than with 120-car dedicated Bakken oil trains with volatile oil in every car. This could easily triple the true increased risks of fires, disasters, and explosions from all of the current proposals that will use dedicated Bakken or Alberta bitumen trains passing through much of our state. Please disclose the true increased risks in these EISs. Please verify if proposed increased risk figures are based on current multi-cargo trains that include some Bakken cars, or are based on the true fully dedicated unit-train risk numbers with Bakken oil in all 120 cars. If unknowable please give us the worst case risks required under WAC 197-11-080(3). Please also include cumulative increased worst case derailment risk from rotten rail ties resulting from projected increases in coal transport. Mitigation could include inspection of all ties on a regular basis before any proposals or any increased train use is approved. The problem is nobody wants to inspect all the tracks.

Response GP300-16

Refer to the Master Response for Geographic Scope of the EIS for a discussion of the qualitative approach to and the extent of the scope of the risk analysis in the extended study area.

Refer to the Master Response for Connected or Similar Actions for a discussion of how other projects are considered in the Draft EIS.

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, methods, and data sources used in the risk assessment and for a discussion of why the figures graphically depicting risk were removed from the Final EIS.

Comment GP300-17

SEPA mitigation measures

No export of any oil products from this state that are not intended for use in this country, should be one of the many needed mitigation measures for any proposal to transport oil by rail through our state. It will eliminate the global warming impacts associated with disposal of high-sulphur coke petroleum residues from Canadian oil-sand bitumen that would otherwise collect at the Anacortes refinery, and likely be sold to Mexico or China as a cheap low grade coal substitute. It might effectively eliminate all shipments of Alberta oil-sand bitumen if it cannot be exported.

New stronger oil rail cars required for all Bakken crude transport---full disclosure is also needed that they can and have still ruptured and or exploded at speeds of less than 40 MPH, and all such studies as to their true safety in crashes must be acknowledged in the EIS.

Full track and track support structure inspections with regular complete status reports on all lines prior to approval of any facilities, and prior to any increases in Bakken unit train transport in this state, and prior to any new terminal approvals. Replacement of wood ties with concrete ties might be another option.

Regular and frequent brake inspections on all Bakken oil trains prior to entry into this state, and prior to any new facility approvals. All oil trains in this state must have frequent brake inspections of all brakes.

A railroad disaster insurance requirement of at least perhaps $5 billion dollars as one mitigation requirement commensurate with the scale of a moderate (worst-case would be easily over $20 billion) disaster for all rail companies that choose to haul Bakken crude in this state. Otherwise these costs will likely be paid by Washington taxpayers. That is one great reason to calculate worst case impacts, but another is so we know where the weakest response capabilities are. All of the rail carriers must be adequately insured in case of the inevitable disaster with all the associated lives and property that might be lost, not to mention the potential environmental impacts. Without worst case analysis we do not know if $5 billion is enough. A disaster in a larger metropolitan area like the route through Spokane with a 300 foot high fireball could easily cost $20 billion or more. Class one railroads only carry about $1.5 billion. The disaster in Quebec was relatively small but still cost about $2 billion. See Siteline Institute, RISK ASSESSMENT FOR RAILROADS--How taxpayers will end up paying for the costs of a worst case oil train derailment, by Eric de Place and Rich Feldman, May 19, 2014.

The federal government did not choose to help us pick up wildfire property losses last summer and may not help with railroad fires and explosions in our towns either. Let taxpayers know this.

Washington farmers should be given highest priority to rail transport access, ahead of unit train use in this state, to get their produce to market. Farm produce should also have top priority at all ports loading their farm products for export.

New cleanest low emission diesel engines required for all unit trains that pass through any residential neighborhoods in this state.

No coal trains with high-sulphur Powder River Basin coal allowed in our state because of the threat to so many human lives resulting from sulphuric acid rotting the railroad ties and no regular railroad tie inspections and replacements.

Total replacement of all wood railroad ties with sulphuric acid resistant concrete ties prior to any new facility approvals.

Thank you for reading my scoping suggestions. If they are not used in the EISs I hope you can let me know why not.

Sincerely,
Fred Greef (private citizen)

Response GP300-17

The Final EIS includes the proposed mitigation measures for the proposed action. Refer to the Master Response for Mitigation Framework for additional information about the development and enforcement of mitigation measures.

GP301, **Green, Richard**

Comment GP301-1

Please deny these permits. In the face of the onslaught by the oligarchs of oil and coal, it is imperative that we stand up and refuse to allow their greed to jeopardize life along the rail and at the terminals. At a time when carbon fuels are less in demand & prices are dropping, its time to focus on alternatives and put an end to the immoral stranglehold Big Carbon has had on all of us.

Response GP301-1

Comment acknowledged.

GP302, **Greenridge, Connie**

Comment GP302-1

I am a resident of Ocean Shores and have lived here for forty years. I have been involved in the commercial fishing, am a clam digger, avid kayaker and walk and enjoy the waterways on a daily basis. I have seen what happens when we don't take care of our resources. With this personal knowledge, I believe that furthering the transportation of oil is a danger for our environment. My vote is a NO! I understand that our area needs jobs for people but please rethink this oil transport idea. There is too much potential for disaster. Thank you for your time Connie Greenidge Connie Greenidge

Response GP302-1

Comment acknowledged.

GP303, **Greenridge, Connie**

Comment GP303-1

I am writing to oppose the transport of crude oil. I have resided in Grays Harbor for 40 years and recreated in Grays Harbor all my life. Because of this long term exposure to the waterways in the this area and beyond, I understand that we would not fair well if there was an oil spill. I have not observed any movement to improve the rail system and have seen what happens when goes off its track, not to even mention what damage is caused when there is an oil leak, in or upon our waterways. I do understand that our area needs jobs and how important that is, but, to me, this is too big a price to pay for the eventual still. Thank you for you time. Again my vote is a resounding NO!

Response GP303-1

Comment acknowledged.

GP304, **Greenridge, Frederick**

Comment GP304-1

I have lived in Ocean Shores for about 40 years, long enough to realize the damage an oil spill could do to this harbor and surrounding beaches. Grays Harbor business, jobs and tourism is largely dependent on the quality of its water. Sea life, be it shellfish, fin fish, mammals or birds can only survive and reproduce in clean water. Oil spills are guaranteed with the increase shipping of any sort of oil in the confined space of Grays Harbor. A huge volume of water crosses Grays Harbor Bar daily, in and out. Any oils spills will spread rapidly thru-out the Bay and for many miles on both North and South beaches. Oil booms will be totally useless to contain fast moving oil on and in this water. We don't have Boeing or Microsoft to fall back on when the oil spill happens. Jobs here depend on water quality for business and recreation. Haven't we seen enough oil soaked birds? There is already enough risk for oil spills from existing rail, tank farms and oil shipping that are in place. NO! on increased oil terminals for Gray Harbor. Respectfully Submitted, Frederick Greenidge Former Salmon Troller

Response GP304-1

Comment acknowledged.

GP305, **Grellier, Penny**

Comment GP305-1

As a surfer, hiker and Surfrider member, I enjoy visiting the Washington Coast, especially the area around Grays Harbor. I go to enjoy the natural beauty of the coastline, do some bird- and wildlife watching, spend time in the water and along the beach, and I support the local small-town economies while I'm there. I am opposed to expansion of oil terminal services in Grays Harbor because it puts at risk all of those things that I place value on and that are unique to Washington State. The EIS fails to take into full and realistic consideration the wide range of adverse effects oil trains and storage facilities would have on Grays Harbor and adjacent areas. Transport of oil through rural, ecologically fragile sections of Southwest Washington is a dangerous prospect for residents, human and wildlife alike. The rail lines are not designed to handle such traffic and a derailment would have a catastrophic impact on the surrounding communities and environment. Storing oil at sea level in a seismically-active tsunami zone puts people, animals, ocean and air health at high risk. Even a small spill would negatively impact the livelihood of anyone who earns their living in the fishing industry, not to mention the destruction of habitat and loss of life among marine animals and birds. Visiting the coast means peace, solitude and unspoiled landscape. It showcases the wild parts of our state that are protected places for animals to thrive. It means recreational activities, tourism and spending money in local businesses. Oil terminals have the potential to ruin all of this even before there is a critical incident. Please don't bring that to Grays Harbor.

Response GP305-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP306, **Grossman, Zoltan**

Comment GP306-1

My name is Zoltan Grossman. I'm a geography professor at the Evergreen State College, and I'd like to speak in favor of the two oil terminals. Just kidding. I just wanted to see what that sounded like.

In the cumulative impact section of the DEIS, it says that the Bakken oil would, quote, Replace oil currently used in U.S. refineries, there will be no net increase in overall emissions in greenhouse gasses. But this dismisses the geographical point.

This is not just any oil that can be interchanged with oil from Alaska or elsewhere, byproduct of Bakken oil fracking. The cumulative period of new Bakken oil terminals on the West Coast are necessary to keep the Bakken Basin operating into the foreseeable future and making a profit. And right now oil fracking is in financial trouble even in North Dakota. The high financial debt incurred in oil fracking mixed with dropping oil prices, decline in production from existing oil wells, and decline in the number of new wells all indicate a bust in the fracking industry.

Bloomberg News reports that the U.S. shale patch is facing a shakeout as drillers struggle to keep pace. Last week, Fortune Magazine reported that, Frackers could soon face mass extinction, because market analysts are refusing to lend to frackers.

This is one extinction that we should help hasten. Without this shipping off via the West Coast, that's how we can maybe hasten a fraction process to an earlier end. We have a geographic responsibility as the trump point for shipping between North America and Asia to use our location to mitigate carbon pollution.

Oil is like heroin. With oil companies as the pushers, the rail companies are the smugglers, all of us are the addicts, and climate change is the overdose. But instead, investing more attention by stopping the crime through our state and finish treating the symptom.

The Bakken man camp has created a hell hole in North Dakota. With traffic of sexual assault, we have become complicit in evil not only towards the environment...

Response GP306-1

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

GP307, **Grossman, Zoltan (Evergreen State College)**

Comment GP307-1

Testimony to Washington Department of Ecology and City of Hoquiam

Hearing on Westway and Imperium Draft Environmental Impacts Statements

Dr. Zoltan Grossman, October 8, 2015

My name is Zoltan Grossman, a professor of geography at Evergreen, and co-editor of Asserting Native Resilience: Pacific Rim Indigenous Nations Face the Climate Crisis.

The Cumulative Impacts section of the Westway EIS asserts, "It is anticipated that the majority of crude oil to be handled and stored at the proposed facilities would come from domestic sources (e.g., Bakken crude oil). This crude oil can only be transported to U.S. refineries, which are limited in capacity by law. Therefore, this oil would replace oil currently used in U.S. refineries and there would be no net increase in overall emissions."

But this misses the geographical point. This isn't just any oil that can be interchanged with oil from Alaska or elsewhere, but a product of Bakken oil fracking. The cumulative series of new Bakken oil terminals on the West Coast are necessary to keep the Bakken Basin operating into the foreseeable future. Just like Montana coal or Alberta tar sands, the Bakken needs that shipping infrastructure in order to sustain the companies' profit.

And right now, oil fracking is in financial trouble, even in North Dakota. The high initial debt incurred in oil fracking, mixed with dropping oil prices, declining production from existing oil wells, and declining numbers of new wells, all indicate a looming bust in the fracking industry. As early as May last year, Bloomberg News reported that "The U.S. shale patch is facing a shakeout as drillers struggle to keep pace with the relentless spending needed to get oil and gas out of the ground. Shale debt has almost doubled over the last four years while revenue has gained just 5.6 percent." Just on September 26, Fortune magazine reported that "Frackers could soon face mass extinction." Because more banks are refusing to lend to frackers, many companies may start going bankrupt after the annual audits this month.

This is one extinction that we should help hasten. Without cheaper shipping options via the West Coast, that bust may be hastened and fracking brought to an earlier end, and the remaining oil left in the ground instead of turned into greenhouse gasses. We have a geographical advantage as the chokepoint for shipping between North America and Asia. It is our geographical responsibility to use our location to mitigate carbon pollution. Oil is like heroin, with the oil companies as the pushers, the rail companies as the smugglers, all of us as the addicts, and climate change as the overdose. But instead of preventing more addiction by stopping the smugglers, our State has been only treating the symptoms and enabling the pushers with new rail and terminal infrastructure.

Response GP307-1

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, the proposed action would not result in additional drilling or Bakken production because the transportation capacity to move crude oil out of the Bakken formation is more than adequate.

Comment GP307-2

The increase in oil shipments is reliant on new infrastructure here in the Northwest. Build it, and they will come. Don't build it, and they may still come, but with much lower volumes and posing less risk. It used to be that if a community rejected trains or pipelines, they'd just be shifted elsewhere. But along the West Coast, Big Oil is now hounded wherever it goes. We are tying the well-being of our public port to the very volatile, unstable, and risky boom-and-bust oil economy of North Dakota. The Bakken man camps have created a hellhole in North Dakota, with enormous growing social problems, such as a huge spike in sexual assault, an astronomical increase in highway accident deaths with all the water and chemical trucks on the roads, not enough jail space to deal with a quadrupling in the crime rate. We have become complicit not only in environmental destruction, but in evil and suffering of human beings.

I'm glad that Ecology is preparing for oil spills from shipments already coming through our state, but that's different from using a new clean-up plan to rationalize a huge increase in shipments through the new terminals. Bakken oil doesn't just spill, it explodes, so the damage would be done long before crews could arrive. Here's an analogy to show the absurdity of the clean-up fix. A cigarette company wants to distribute lighters to kids in a local grade school to promote its product. The local government acknowledges that all the lighters might increase the risk of the kids accidentally setting fires, so to offset that risk it funds a new burn unit in the local hospital. What parents would be reassured by the promised response of medical treatment, knowing that a great danger could be easily prevented by simply not distributing the lighters? And that's what's going on here: building new oil terminals is literally playing with fire, and the role of government is to protect our kids.

On the first day of any Environmental Studies class, we talk about the Precautionary Principle that it is more cost-effective and ethical to prevent disaster in the first place than to only to tinker with technical fixes or plan an after-the-fact response. Build it, and they will come, and we're saying the simplest way to prevent the risks is: Don't build new oil infrastructure.

Response GP307-2

Comment acknowledged.

GP308, **Grundbaum, Arthur**

Comment GP308-1

My name is Arthur Grundbaum, Aberdeen, Grays Harbor County. I'm fortunate to live on the shores of the Grays Harbor estuary and utilize the bounty which it supplies on a daily basis.

I've attempted to digest the 3,649 pages of the Draft EIS, but documents are dense with argument and overwhelming with jargon and esoteric tables, instead of a clear, precise analysis of what is proposed and what will be the effects.

I'm sure that I am not alone, and I request that more time is allowed for comment so that the general public can more adequately engage in the discussion of these projects that will have a transformative effect on our entire state.

Response GP308-1

Pursuant to WAC 197-11-455, the lead agency for a SEPA proceeding shall provide 30 days for review of and comment on a Draft EIS. This may be extended by 15 days upon request. The co-lead agencies issued an extended 60-day comment period that was then extended to 90 days based on public requests to provide additional time for review and comment.

Comment GP308-2

The problematic impacts of these projects cannot be mitigated and the permits must be denied. As we stand in the shadows of the whoops nuclear towers, I would also like to make a comment about the choice of this venue to hold a public hearing on such an important subject.

Whoops is a symbol of bad judgment by business and regulatory agencies. We can only hope that this insensitive choice of location owned by unwavering project cheerleaders, a part of Grays

Harbor, will be profit that this public hearing is held at the feet of such an icon of foolishness. Thank you.

Response GP308-2

Comment acknowledged.

GP309, **Grundbaum, Arthur**

Comment GP309-1

Thank you. Arthur Grundbaum again, speaking about the length of time that we have to comment and the density of the DEIS. I want to remind you that when you guys gave the mitigated determination of nonsignificance, it was an 11-page -- a 12-page document, and you took 30 -- I'm sorry, you took 90 days to review those documents and to release that MDNS.

So, given that the DEIS is 3,649 pages, not including the fact sheets, it would seem that the public should be allowed to have more than 60 days to review those very dense, complicated, lengthy Draft Environmental Statements. Thank you.

Response GP309-1

Pursuant to WAC 197-11-455, the lead agency for a SEPA proceeding shall provide 30 days for review of and comment on a Draft EIS. This may be extended by 15 days upon request. The co-lead agencies issued an extended 60-day comment period that was then extended to 90 days based on public requests to provide additional time for review and comment.

GP310, **Grundbaum, Arthur**

Comment GP310-1

My name is Arthur Grunbaum. In my reading of the DEIS, there seems to be a serious significant adverse effect. It cannot fully mitigate this offer made 151 times in Volume I of Imperium, and 148 times in Westway's Volume 1.

For example, 4.7.1 environmental impacts of a spill. Quote, No mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill.

4.7.2, environmental impact of fire or explosion essentially says the same as does 6.5.3.4, Tribal Resources, unavoidable, significant and adverse impacts. Again, the same statement would also apply to nontribal and recreation fishing as well.

6.5.7.5, significant hazard, environmental impact states no mitigation measures would be -- completely eliminate the possibility. And it goes on.

In truth, the only mitigation possible is avoidance. You must deny the permits to Westway and Imperium and not allow these projects to go forward. These projects are asking the entire state of Washington to absorb the risks and costs while they feast on the profits.

Thank you.

Response GP310-1

Refer to the Master Response for Mitigation Framework for more information about the development, implementation, and enforcement of mitigation measures.

GP311, **Hale, Dave**

Comment GP311-1

The decision to limit this EIS to the Chehalis River up to the Chehalis/Centralia area and three miles out to sea is too restrictive. These projects are going to affect the health and safety, and the environments all along the rail transport routes, and ultimately the air and water quality of our region not to mention the global effect on climate change. You must assess the cumulative impacts of these projects from the oil fields and the sources of the proposed feed stocks, through the communities along the rail routes as well as the overall additions to GHGs.

There is also the cumulative impacts of the various fossil fuel projects proposed for the Pacific Northwest throughout the lower Columbia River Basin as well as the Puget Sound Region. Health and Safety will be adversely impacted with the large number of unit trains passing through numerous small towns and communities ill equipped to handle a spill or a fire resulting from some of the fuels being transported (Bakken crude). Please add these concerns to your investigations and assessments. Thank you for the opportunity to comment Dave Hale

Response GP311-1

Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, have been updated to include emission estimates from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for more information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP312, **Hamilton, Tim**

Comment GP312-1

Thank you. For the record, my name is Tim Hamilton. I live up on McClary. I have two passions in life. One of them is fish. I’ve spent 30 years in the hatchery, enhancement volunteer projects and things with my family. The last four years studying the fisheries in Grays Harbor and so on, at the request of the Director of Fish and Wildlife.

I have another passion. If you hit Google you’ll see I’m a petroleum industry consultant as advisory to DOE, EPA, the Department of Energy, the United States Congress. Primarily I’m controlling issues

(inaudible). But I know it, I know it very well. It's been my whole life. It's been my whole life. I know people, I have family and friends who brought in the Calgary fields.

Now, the report you put out, because I do a lot of analysis, is willfully inadequate. In fact if you want to know the truth, the fisheries so totally doesn't recognize the risk to all of us.

From the petroleum side, I'm going to show you how bad it is. I had an opportunity this weekend -- or this summer, to go to a nice little barbecue. All of us get together, you know. Two Canadian engineers, petroleum engineers help bring those fuels in there. We were talking about them bringing in the pipelines. Because you've got to (inaudible) where the pipelines would be, because we couldn't bring them above ground because it was too dangerous.

So we had (inaudible.) And they said, you can't get it across to Vancouver, B.C., so you're going to bring the price of oil up in North America because the B.C people don't want it because there's no gain to them financially, only environmental risk.

Yeah. Well, would you think of bringing it down by rail through the Frasier River Canyon or Chehalem? They looked at me and their eyes got really big, and they said, Are you kidding me? The train goes right beside the river and through all those trucks. And answer was this: My God, Tim, they wouldn't do this, would they? You couldn't sell this to petroleum people. It sucks.

Response GP312-1

Comment acknowledged.

GP313, **Hancock, Ray**

Comment GP313-1

As long as the initiators and heirs of these projects are proposing a default bond, significant enough to cover any eventuality upon failure or abandon of these sites; and all environmental requirements are in compliance, I support these projects. Bringing jobs and economy to WA should be foremost to all. Environmental impacts are a fact of life and everyone should be a good steward to their environment even big business. It is a huge problem in WA State especially that the tax payers are on the hook for the environmental failings of big business. All that can be done should be done to assure the project owners are wholly responsible for cleanup due to failure or abandon of these types of sights in perpetuity.

Response GP313-1

Comment acknowledged.

GP314, **Hansen, Elizabeth**

Comment GP314-1

Name: Elizabeth M. Hansen
Organization Name (if applicable): St. Patrick's
Church, Seattle City/State/Zip: Seattle, WA 98136

My comments relate to both the Westway and Imperium Draft EISs.

It is a matter of conscience that I am addressing you, especially in light of Pope Francis' letter to the world on the environment. Crude oil terminals proposed in Grays Harbor is a tremendous danger on many levels. I want to address the issue that a major oil spill, which is a real possibility in light of the recent train explosions, is a threat to the narrow waterways at Grays Harbor and the fishing industry including the Quinault Indian nation. An economic study found that a major oil spill could put more than 150 tribal commercial fishermen out of a job, resulting in a direct loss of as much as $20 million in wages and up to $70 million in revenue for affected businesses. This far offsets the paltry amount of jobs that the terminals would generate. Plus please consider the damage an oil spill would do to the ocean and seabirds. In 1988, the Nestucca barge holed off Grays Harbor spilled 231,000 gallons of marine banker oil, killing or injuring an estimated 56,000 seabirds. The oil sheen was seen from Oregon to the strait of Juan De Fuca.

Response GP314-1

Comment acknowledged.

GP315, **Hardesty, Alice**

Comment GP315-1

I am writing as an Oregonian and a citizen of the world as well as a member of a faith community.We in Portland love the Gorge too and we do not want millions of gallons of Bakken Crude going through our Gorge every day. There have been too many accidents -- just two in Wisconsin recently. We at St. Michael's are in the process of reducing our carbon footprint in many different ways.

We believe that sending crude oil through our Gorge to ports on the West Coast destined for Asia and other far away places does nothing but harm to our own economy and environment. Please do not allow this to happen. Thank you for your consideration

Response GP315-1

Comment acknowledged.

GP316, **Hargrove, Bourtai**

Comment GP316-1

Name: Bourtai Hargrove
City/State/Zip: Olympia, WA 98512

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

Re: Comment on the DEISs for the Westway and Imperium oil terminal proposals

To the Washington Department of Ecology and the City of Hoquim:

There is one glaring omission in the draft EISs for the Westway and Imperium oil terminals. No mention is made, and no analysis is done on the most significant, far-reaching and disastrous impact

that the terminals, if built, would have on Washington State and on the world. There is no evaluation of the impact that burning the oil transported by the 100+ tanker trains and the huge tank vessels would have on global warming. For Hoquim alone, Westway Terminals is expected to transport 48,918 barrels of crude oil per day, Grays Harbor Rail Terminal is expected to transport 45,000 barrels of crude oil per day, and Imperium Terminals is expected to transport 73,500 barrels of crude oil per day for a total of 167,418 barrels of crude oil per day. If the Tesoro-Savage Vancouver oil terminal, is built, it is expected to transport a staggering 360,000 barrels of crude oil per day, making it the largest oil terminal in the nation. Taken together, the Northwest oil-by-rail projects would have a much larger capacity than the controversial Keystone XL Pipeline. Describing the Keystone XL Pipeline several years ago, NASA climate scientist James Hansen said it was "the fuse to the biggest carbon bomb on the planet" and, if built, the pipeline would be "game over for the climate." If the Grays Harbor and Vancouver oil terminals are permitted and constructed, Washington State port will succeed the Keystone XL pipeline as the biggest carbon bomb on the planet. Our beautiful green state has become a crucial battleground in the fight to halt climate change. The decisions we make about fossil fuel infrastructure today, may well determine whether our children and grandchildren inherit the temperate climate that has enabled humans to thrive throughout history, or are condemned to struggle in a nightmare world of unprecedented heat waves, droughts, and storms.

As you know, the news on climate change is increasingly dire. Despite alarming evidence that the Antarctic and Greenland ice sheets are melting rapidly, the Siberian permafrost is belching methane, and ocean acidification threatens to eliminate coral reefs and shellfish, our greenhouse gas emissions have recently surged and are now at an all-time high, as the World Meteorological Association reports. CO2 levels are now above 400 parts per million and fast approaching the point where the world will not be able to restrict global warming to the 2 degrees Celsius that scientists warn is the threshold above which we face catastrophic consequences. We must keep 80% of known fossil fuel resources in the ground if we are to keep global temperature from soaring beyond the 2 degree C threshold. When the oil transported by the Westway and Imperium projects is burned, wherever it is burned, it will add to the cumulative level of CO2 already in the atmosphere bringing us closer each year to catastrophe. Our current trajectory is leading us toward 4 or 6 degrees C warming by the end of the century, a level we know to be a potentially civilization-threatening disaster. As Kevin Anderson, a leading scientist with the Tyndall Centre for Climate Change Research has warned, "For humanity, it's a matter of life or death."

In any assessment of the environmental impacts of the proposed oil terminals in Grays Harbor, we must address the looming danger of climate change. To ignore the greatest threat that humanity has ever faced, is insane. In my comments during the scoping hearings for these projects, I asked the Department of Ecology to determine the amount of additional CO2 that burning the oil transported by the Westway and Imperial projects would add to the cumulative CO2 already in the atmosphere for each year during the expected life of the projects and, using the best available science, evaluate the long term impact on the climate. This is not someone else's jurisdiction, and someone else's responsibility. It is our responsibility, all of us. The Department of Ecology decided to review the impacts of climate change in the EIS for the proposed Gateway Pacific coal terminal at Cherry Point. It is no less crucial here. The draft EISs for the Westway and Imperial oil terminals must be revised to include a comprehensive analysis of their potential effect on climate change. And the only reasonable conclusion is that the permits must be denied. No mitigation is possible.

With hope for a livable climate,
Bourtai Hargrove
Bourtai31@gmail.com

Response GP316-1

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, acknowledges that greenhouse gas emissions contribute to climate change and describes the projected impacts of climate change in the Pacific Northwest.

Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively. The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

GP317, **Hargrove, Bourtai**

Comment GP317-1

My name is Bourtai Hargrove, and I live in Olympia. There is one glaring omission in the Draft EIS for the Westway and Imperium oil terminals. No mention is made and no analysis is done on the most significant far reaching and disastrous impacts that the terminals, if built, would have on Washington state and around the world.

There is no evaluation of the impact of burning oil transported by the trains and vessels would have on global warming. The news of climate change is disregarded despite alarming evidence that the Greenland sheets of ice are melting rapidly, the Siberian permafrost is belching methane, and the ocean acidification threatens to eliminate our shellfish.

Our greenhouse gas emissions continue to surge. CO2 levels are up 400 parts per million and fast approaching the point where the world will not be able to restrict global warming to the two degrees Celsius that science warn is the threshold above which we face catastrophic consequences.

The three terminals planned for Grays Harbor area are expected to transport a total 167,480 barrels of crude oil per day. When the oil is burned, wherever it is burned, it will add to the cumulative CO2 already in the atmosphere bringing us even closer each year to catastrophe.

The decision we make about fossil fuel today may well determine whether our children and grandchildren inherit the temperate climate that has enabled humans to thrive throughout history or condemned to struggle unprecedented heat waves throughout the world. No mitigation is possible. The permits must be denied.

Response GP317-1

Refer to Response to Comment GP316-1.

GP318, **Hargrove, Bourtai (Confronting the Climate Crisis)**

Comment GP318-1

It makes no sense to build infrastructure for the transport of oil when we need to keep 80% of known oil reserves in the ground if we are to halt global warming at 2 degrees Celsius above pre-industrial levels—the internationally accepted threshold beyond which lies catastrophe. Yes, there is a risk of the derailment and explosion of one or more of the huge oil trains. In fact, over the life of the Westway and Imperium projects, such an explosion is inevitable and would wipe out nearby communities, pollute our rivers, and destroy the fishing industry in Grays Harbor. But the pollution of the Columbia and Chehalis Rivers, the destruction of our precious wildlife preserves, and the inevitable loss of life wherever the explosion occurs pales in significance to the horrendous consequences of burning the oil and adding additional CO2 to the cumulative CO2 already in the atmosphere. Unless we transition from fossil fuels to renewable energy within the next two decades, we may pass tipping points that take climate change beyond our power to control. Human lives are already endangered by climate change, and human beings may be at risk of extinction if we do not recognize the danger in time and act now! We cannot permit the big oil companies to destroy civilization! No mitigation is possible—we must oppose big oil in every way we can.

Response GP318-1

Refer to Response to Comment GP316-1.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP319, **Harlan**

Comment GP319-1

My name is Harlan. I came from Portland to speak with you today. I grew up not far from the refinery areas in New Jersey. And that was really ugly, 15, 16 years ago. If you turn this harbor into a stinking sewer of oil, no one will forgive you. You will have no place to run and no place to hide.

The bigger picture is global. If we invest any more in fossil fuels, it delays the transition to sustainables. If you let this go forward, my children will have no place to run and no place to hide.

Response GP319-1

Comment acknowledged.

GP320, **Harlan**

Comment GP320-1

So my name is Harlan. I'm from Portland, and I came here to speak against these proposals.

On a local level, the environmental impact statement or the DEIS fails to address a number of points.

Unmitigatable is the local traffic problem with the long trains and the degradation of the marine environment, which is largely the basis of our economy now.

Response GP320-1

Comment acknowledged.

Comment GP320-2

On a regional level, the Department of Ecology has failed to look beyond the 59-mile track of local trunk line. These trains come from -- they come through a whole lot of Washington State, Spokane, I believe, in my area, Washougal, Camas, and Vancouver and on up to here, and the hazard of rail transport of oil are pretty well known. So, until all of that is accounted for, the EIS is incomplete.

Response GP320-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP320-3

And, on a global level, this will affect us all. We have got to change course, and this large of an investment will have huge forces trying to keep it in use for many decades. So we can't just use this fuel for a short time while we figure out renewables.

We need to stop putting resources into the old fossil fuel technology and put the efforts into the renewables. We're as good as there in how to do it. We just need the investment to turn it around. Thank you.

Response GP320-3

Comment acknowledged.

GP321, **Harris, Clairmonde**

Comment GP321-1

Three oil-by-rail export terminal proposals are under consideration in Grays Harbor and two in Vancouver, including one which would be the largest oil terminal in the nation. If these terminals are approved, about 25 million gallons of volatile Bakken crude oil would be transported in unsafe rail cars every day through the Gorge. That's 55 fully loaded, mile-long trains every week! The most important negative in these transports is the risk of environmental damage to the Columbia Gorge National Scenic Area-Risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, vehicle delay at railroad crossings. This special are which is visited by people from all over the world deserves better!!! A better solution to move away from fossil fuels and towards clean, renewable sources to meet our electricity needs and respond to global warming. Building more, large infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor. Washington state should continue to lead on safe, renewable, clean energy solutions.

Response GP321-1

Comment acknowledged.

GP322, **Harris, Maury**

Comment GP322-1

The only place I have ever known as home are the Willamette Valley and Southwest Washington. I've fished the Columbia River and its tributaries for 25 years and have hiked thousands of miles throughout Oregon and Washington. I value the scenic beauty, but more importantly I understand the vital role our region's natural spaces play in the overall health of the environment and sustainability of our Earth. Projects, such as the Westway and Imperium terminal expansions take none of this into account. Their concern is the bottom line, and our economy is slow to value the cost of sustainable energy and takes little account for environmental degradation.

The direct impact of these terminals is bad enough, with the threat of oil spills and rail car fires.

But the larger issue is the ancillary effects that increasing fossil fuel consumption will have on a global scale. Increased coal burning in China has brought an increase in acid rain to US shores, and the melting of polar ice caps and global climate change has largely been attributed to the burning of fossil fuels. It's time for our state to be a leader. It's time to fund companies looking to pave the way for a new energy future and to use projects such as these as the start of a global conversation and shift. It's our responsibility as Washingtonians and global citizens to show that we didn't sell ourselves down the river and that we defined the new status quo of energy independence. Please consider saving the places and recreational activities that have come to define me and my family. Please show that Washington hasn't forgotten its pioneering spirit. Deny these shareholder-led projects of their shortsighted goals.

Response GP322-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP323, **Hartwell, Beth**

Comment GP323-1

Dear Washington Department of Ecology and City of Hoquiam: I write as a woman that has lived along the Columbia, in both Washington State, and Oregon since 1977, so am no stranger to river traffic, or to unemployment / industrial change through the decades. Our families and communities have been assaulted by irresponsibility for the quick fix, the magic pill, that will somehow bring the illusion of prosperity, rather than investing in the community in a deep and self sustaining way. This is another of those non-solutions, where we give up our resources and safety for a few to prosper. There is simply too much risk and too little reward from these proposals: Grays Harbor and rail-line communities would take on the risk and oil companies would reap the profits, while Grays Harbor and the Columbia River Gorge would become a through-way for oil going elsewhere. There are better ways to meet our energy demands. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our electricity needs and respond to global warming.

Building more, large infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor. Washington state should continue to lead on safe, renewable, clean energy solutions and say no to more oil and coal. I urge you to do everything in your power to stop these dirty and dangerous projects. I beg you to protect Grays Harbor, the Columbia River Gorge and its communities by rejecting the proposed Westway and Imperium oil terminals. This is not a solution for our local communities. Sincerely, Beth Hartwell

Response GP323-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP324, **Harty, Florence**

Comment GP324-1

Living in the beautiful Gorge, I do not want coal trains going through constantly. Please do not allow this.

Response GP324-1

Comment acknowledged.

GP325, **Hatley, Dave**

Comment GP325-1

Name: Dave Hatley
City/State/Zip: Aberdeen, WA 95201

I live in the blast zone in Central Park. I fear for my life & my neighbors when an oil tank car explods. The citizens of Wa. state & Grays Harbor need to be protected from Bakken Crude oil in transport as well as storage, the air, water and soil will be contaminated when oil is brought into Grays Harbor.

Carbon emissions will be extreme.

When a spill occurs nothing can clean it up.

No one can mitigate wind, tides & rain when crossing the bar to unload oil to tankers there is extreme danger. Winds have regularly exceeded 50 M.P.H. (winter) some reaching and surpassing 100 M.P.H. How can one say there will be no accidents (oil spills) when over 2.3 billion gal. of oil passes through Grays Harbor. Has anyone taken responsibility for the oil once exported to foreign nations? This will pollute the earth. Say no to oil export & oil trains passing through Grays Harbor. It is pure folly to suggest anything will benefit the landscape-rivers or the economy. Except for oil-the Port of Grays Harbor & the R.R. no one wins. Especially not the citizens of Grays Harbor. Even the

firemen state they have no means to extinguish a fire over a oil tank car explodes. They must just watch it burn.

DOES THIS MAKE SENSE? This idea is pure folly aimed at destroying our beautiful Harbor-rivers and beaches. Please examine the consequences of such a fairy tale.

Response GP325-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP326, **Hauck, Robert**

Comment GP326-1

The transport of Canadian and North Dakota oils through our sensitive coastal environment is a set-up for an environmental disaster. Train traffic through our WA cities will severely affect quality of life for local residents. Regulation by WA and Federal is a necessity to protect our WA residents and our PaCIFIC NW environment. Robert Hauck, MD, pediatrician.

Response GP326-1

Comment acknowledged.

GP327, **Havrilak, George**

Comment GP327-1

Attached is a Word document containing my proposed changes to the Westway DEIS Executive Summary in line-in/line-out format with rationale. Line-in (blue font, underscored)/line-out (red font, strikethrough).

The following are line-in (blue font, underscored)/line-out (red font, strikethrough) comments relevant to the Imperium DEIS, Executive Summary document.

P. S-8. Water: Rail and Vessel Transport. Add an example of an oil spill that significantly contaminated a municipal water supply for days. For example, amend paragraph to read: "Increased rail traffic could affect the quality of surface waters and groundwater along the PS&P rail line as the result of leaks and spills. Sensitive areas that could be affected by such releases include the Chehalis River Surge Plain Natural Area Preserve and the designated Critical Aquifer Recharge Area in the Black River and Scatter Creek sub-watersheds in Thurston County. Most of these releases would likely be limited to minor drips and leaks. The potential for such leaks can be reduced by regularly inspecting and maintaining locomotives and rail cars and by implementing best management practices. The impacts of larger spills, fires, or explosions during rail and vessel transport are discussed separately below; [blue: <u>though a medium size oil spill (50,000 gallons) had significant impact on the municipal water supply of Glendive, MT, as a consequence of the Yellowstone River oil spill on 17 January 2015. The municipal water supply was contaminated for a week</u>]." RATIONALE: As Fig S-2 indicates, even a small rail oil spill may affect water supplies and have a moderate environmental impact. A medium size oil spill such as the Yellowstone River incident

(https://en.wikipedia.org/wiki/List_of_oil_spills) indicates a certain likelihood of contaminating water supply and having a severe environmental impact.

Response GP327-1

Recommendations for revisions to the Draft EIS as noted in the attached document are acknowledged; however, the approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Final EIS Sections 4.4.3, 4.5.3, and 4.6.3 have also been revised to include additional mitigation measures to address risk related to spills, fires, and explosions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant. Revisions to the Final EIS have been made to clarify the potential for unavoidable significant impacts.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP327-2

P. S-20, section entitled, What are the environmental health and safety risks …, para 2, change to read: "A large oil spill, fire, or explosion would likely cause unavoidable and significant adverse environmental impacts. The likelihood … and weather conditions. [blue: Implementation of mitigation (Table S-1) would reduce but not completely eliminate significant adverse impacts on noise, tribal resources, vehicle traffic, and environmental health and safety. Only by denying permits, plans and or approvals for construction and operations] [red: ~~No mitigation measures~~] would completely elminate the possibility of an a major incident, nor would they completely eliminate the adverse consequences of [red: ~~an~~] [blue: a major] incident." RATIONALE: The new fourth sentence is derived from a clear statement found on page S-34. Use of phrase "no mitigation measures" in the last sentence is awkward and confusing. The sentence is about eliminating the possibility of a major incident; it is not about how to lessen the severity (mitigation). Therefore, the only logical way to "completely eliminate the possibility" is to prevent it from happening. The executive summary should clearly state that only by denying permits, plans and approvals will a serious incident be prevented.

Response GP327-2

Comment acknowledged.

Comment GP327-3

P. S-21, section entitled, Risks of Oil Spills, Terminal (Onsite) Operations, para 2, change third sentence to read: "Spill prevention … at the project site. [blue: According to at least three of the five spill scenarios seen in Figure S-1 below], [red: ~~Although~~] the overall risks would be [blue: likely and

severe] [red: ~~low~~], if a spill occurred, [blue: particularly the risks of reaching the water and] the potential environmental damage would be significant. These risks would remain ….” RATIONALE: Paragraph is misleading or incorrect. Fig S-1 on p. S-21 indicates the risks are likely and severe across all three categories in at least three of the five scenarios.

Response GP327-3

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment GP327-4

P. S-21, Rail Transport, para 2, change third sentence to read: “Spill prevention … reduce the risks. [blue: According to at least three of the five spill scenarios seen in Figure S-2 below], [red: ~~Although~~] the overall risks would be [blue: likely and severe] [red: ~~low~~], if a spill occurred, [blue: particularly the risks of reaching the water and] the potential environmental damage would be significant. These risks would remain ….” RATIONALE: Paragraph is misleading or incorrect. Fig S-2 on p. S-22 indicates the risks are likely and severe across all three categories in at least three of the five scenarios.

Response GP327-4

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed in the Final EIS.

Chapter 4 presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 to reduce the likelihood of a spill reaching the environment and the potential impacts if an incident occurs at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion.

Refer to the Master Response for Risk Assessment Methods for more information about the data, assumptions, and approach used in the risk analysis. Refer to the Master Response for Oil Spill Modeling Methods.

Comment GP327-5

P. S-22, Vessel Transport, para 2, change second and third sentences to read: “Spill prevention…. Implementation of mitigation (Table S-1) would further reduce the risks; [blue: however, as Fig S-3 reveals,] [red: ~~Although~~] the overall risks would be [blue: likely and severe] [red: ~~low~~], if a spill occurred, [blue: particularly the risks of reaching the water and] the potential environmental damage would be significant. These risks would remain….” RATIONALE: Paragraph is misleading or incorrect. Fig S-3 on p. S-22 indicates the risks are likely and severe across all three categories of risk for all three scenarios.

Response GP327-5

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment GP327-6

P. S-23, Risk of Fire or Explosion, para 1, change third sentence to read: "For each of the spill scenarios, Figure S-4 (onsite), Figure S-5 (rail transport), and Figure S-6 (vessel transport) depict the likelihood of the spill occurring, the likelihood of such a spill resulting in [blue: a fire and/or explosion] [red: ~~exposure to the environment~~], and the resulting extent of environmental damage that could occur. [blue: In 38 percent of the spill scenarios (5 of 13) the risk of fire/explosion is at least 50/50 or greater; whereas, the risk of spills is at least 50/50 or greater in 69 percent of the spill scenarios (9 of 13)."] RATIONALE: Stricken text is incorrect. The second risk category is "fire/explosion". A fourth sentence is added to clarify the first sentence of the paragraph to show the risk of fire and explosion is greater than implied.

P. S-23, Risk of Fire or Explosion, para 2, change third sentence to read: "Spill prevention…. Implementation of mitigation (Table S-1) would further reduce the risks. Although the [red: ~~overall risks~~] [blue: likelihood of spill and fire/explosion are at least 50/50 or greater in 69% and 38% of the spill scenarios, respectively,] [red: ~~would be low, if a spill occurred~~,] the potential environmental damage would be significant. These risks would remain even with implementation of mitigation." RATIONALE: Clarity and accuracy. Refer to Fig S-4, S-5, and S-6.

Response GP327-6

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment GP327-7

P. S-27. Air. Refer to second and third paragraphs. Since this section finds greenhouse gas emissions resulting from this proposal would be substantial (103,753 million metric tons/yr.), and clearly states greenhouse gas emissions contribute to climate change and increases risks of wildfires, floods and drought in WA State, already prone to these critical effects, permits, plans and approvals should be denied. Furthermore, it says climate change effects from the cumulative projects could contribute to sea level rise. As beaches, businesses and homeowners of Ocean Shores, WA would be severely impacted by rising sea level, including but not limited to increases in annual flood insurance premiums, lost business revenue and lower property resale values, the permits, plans and approvals for this proposal should be denied.

Response GP327-7

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP327-8

P. S-30, Environmental Health and Safety, para 1, change third and fifth sentences to read: "As described above, potential impacts of a spill, fire, or explosion vary based on the incident. A large oil spill… impacts. The likelihood of a large spill or related fire or explosion is [blue: scenario dependent] [red: ~~relatively low~~]; however, the potential for significant consequences to the environment and human health if such an incident were to occur is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. [blue: Implementation of mitigation (Table S-1) would reduce but not completely eliminate significant adverse impacts on noise, tribal resources, vehicle traffic, and environmental health and safety. Only by denying permits, plans and or approvals for construction and operations] [red: ~~No mitigation measures~~] would completely eliminate the possibility of [red: ~~an~~] [blue: a major] incident [red:, ~~nor would they completely eliminate the adverse consequences of an incident~~]." RATIONALE: The third sentence is misleading and potentially incorrect. For example, Fig. S-5 clearly shows that for rail large oil spills the risk of fires and explosion is very likely. The new third sentence is derived from a clear statement found on page S-34. Use of term "mitigation measures" in the last sentence is inappropriate. The sentence is about eliminating the possibility of a major incident; it is not about how to lessen the severity. Therefore, the only logical way to "completely eliminate the possibility" is to prevent it from happening. The executive summary should clearly state that only by denying permits, plans and approvals will a serious incident be prevented.

Response GP327-8

The Final EIS has been revised to clarify the characterization of significant unavoidable adverse impacts. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Comment GP327-9

P. S-30, Environmental Health and Safety, para 4, delete last sentence: "In general, fires or explosions occur as the result of some but not all oil spills. An incident is most likely to occur during transport when higher speeds provide enough energy to generate a spark. [red: ~~Because allowable train speeds along the PS&P rail line and vessel speeds in the harbor are low, the likelihood of a fire or explosion during transport is reduced, although the potential for environmental harm if a fire occurred with or without an explosion could be quite severe."~~] RATIONALE: The content of the stricken last sentence is unsubstantiated by Fig S-5. Fig S-5 clearly shows that for rail large oil spills there is at least a 50/50 chance or greater for a fire or explosion. It makes no distinction that speed is a factor in its depiction. Also, refer to page S-35. Speed is not listed as a factor regarding specific impacts. Number of rail cars (e.g., "amount spilled") involved is the determining factor in Fig S-5 and is one of the four factors listed on p. S-35

Response GP327-9

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety,* have been removed from the Final EIS.

Comment GP327-10

P. S-35, Environmental Health and Safety, para 1, revise accordingly: "A large… impacts. The likelihood of a large spill or related explosion is [blue: scenario dependent] [red: ~~low~~]; however, the potential for significant consequences to the environment and human health in the case of a large spill, fire, or explosion is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. While regulatory requirements for the prevention of, preparedness for, and response to a large spill or explosion and mitigation measures exist, [red: ~~no~~] mitigation measures would [blue: only lessen the impact of] [red: ~~completely eliminate the possibility of a large spill or related fire or explosion, nor would they completely eliminate~~] the adverse consequences of such incidents." RATIONALE: Consistent with earlier related remarks and for additional clarity.

Response GP327-10

Refer to Response to Comment GP327-4.

Comment GP327-11

P. S-35: **Cumulative Impacts**, delete the last clause, as follows: "[red: ~~Because~~] [blue: The cumulative projects, including the proposed action, would have unavoidable and significant adverse environmental impacts on noise, tribal resource, vehicle traffic, and environmental health and safety [red:, ~~the proposed action would contribute to unavoidable and significant adverse environmental cumulative impacts on these resources~~]." RATIONALE: Stricken text is awkward and redundant.

Response GP327-11

The referenced sentence clarifies that the proposed action has unavoidable and significant adverse impacts when considered in isolation and contributes to unavoidable and significant adverse cumulative impacts. The sentence has been retained in the Final EIS.

Comment GP327-12

P. S-52/S-53, Table S-1, Environmental Resource 4.5, Potential Impact, delete last clause: "Increased rail transport related to the proposed action would increase the likelihood of an incident involving a spill, fire, or explosion of crude oil along the PS&P rail line compared to the no-action alternative [red: ~~although the overall risks of large spills would remain relatively low~~]." RATIONALE: The stricken statement is irrelevant, as it does not describe a potential impact; it is potentially incorrect, as Fig S-5 indicates that a large rail oil spill that may involve up to three tank cars has a 50/50 chance of occurring and approximately a 60% chance of fire or explosion. Refer to the large oil train collision and derailment at Casselton, ND, 30 Dec 13, involving 18 ruptured oil tank cars, 400,000 gallons of crude, and 10 oil tank cars may have caught fire and exploded, leading to the evacuation of some residents of Casselton.

Response GP327-12

Refer to Response to Comment GP327-4.

Comment GP327-13

P. S-53, Table S-1, Environmental Resource 4.5, Potential Impact, delete last clause: "Increased rail traffic related to the proposed action would result in increased potential for environmental damage from an incident involving the spill of crude oil compared to the no-action alternative [red: ~~although the overall risks of large spills would remain relatively low~~]." RATIONALE: Irrelevant and potentially misleading. It does not describe a potential impact.

Response GP327-13

Refer to Response to Comment GP327-4.

Comment GP327-14

P. S-58, Table S-1, Environmental Resource 4.6, Potential Impact, delete last clause: "Increased vessel transport related to the proposed action would increase the likelihood of an incident involving the spill of crude oil within Grays Harbor compared to the no-action alternative [red: ~~although the overall risks of large spills would remain relatively low~~]." RATIONALE: Irrelevant and potentially misleading. Stricken text does not describe a potential impact.

Response GP327-14

Final EIS *Summary* has been revised to clarify the relative risks of the proposed action, including revisions to Table S-1.

Comment GP327-15

P. S-60, Table S-1, Environmental Resource 4.6, Potential Impact, delete last clause: "Increased vessel traffic related to the proposed action would result in increased potential for environmental damage from an incident involving the spill of crude oil compared to the no-action alternative [red: ~~although the overall risks of large spills would remain relatively low~~]." RATIONALE: Irrelevant and potentially misleading. Stricken text does not describe a potential impact.

Response GP327-15

Final EIS *Summary* has been revised to clarify the relative risks of the proposed action, including revisions to Table S-1.

Comment GP327-16

P. S-66, Table S-1, Environmental Resource 6.5.7, Potential Impact, amend last sentence: "Under cumulative conditions, there could be an increase in the likelihood of incidents involving a spill, fire, or explosion of crude oil compared to the no-action alternative. [red: ~~Although the overall risks would remain relatively low~~], [blue: <u>The</u>] potential environmental damage would be significant." RATIONALE: Stricken text is irrelevant.

Response GP327-16

Final EIS *Summary* has been revised to clarify the relative risks of the proposed action, including revisions to Table S-1.

GP328, **Hayes, Glenna**

Comment GP328-1

Name: Glenna Hayes
Organization: 350.org PDX
City/ State/ Zip: Portland, OR 97219

The draft environmental impact statement does not address the impacts to the greater Washington and OR area that will be directly impacted by the enormous risk due to increased numbers of oil trains coming through our region.

Response GP328-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP328-2

The DEIS conclusion regarding the impact to tribal fishing opportunities is dismissive and totally unacceptable. The Quinault Indian Nation has tribal fishing rights. These rights are vital to the well being and survival of the Quinault Nation.

I urge you to reject the project based on the failure of the DEIS to include the impact on the region as a whole and for failing to adequately address impacts on tribal resources. There is no way to mitigate these damages.

I am a resident of Portland, OR and I consider the Pacific Northwest my home. This project has a negative impact far beyond the Aberdeen community. I stand in support of the hundreds of community members who have called for the rejection of these projects.

Glenna Hayes.

Response GP328-2

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP328-3

Spills due to derailment and subsequent fires from derailment have not been adequately addressed. There have been 16 derailments in the region in the last year and 14 of these resulted in fire. If those trains had been oil trains the result would be catastrophic.

Response GP328-3

Refer to the Master Response for Environmental Health and Safety Analysis.

GP329, **Haywood, Susan**

Comment GP329-1

Name: Susan Haywood
Organization: 350.org PDX
City/ State/ Zip: Portland, OR 97219

There are many issues that cannot be mitigated that will arise from this project. There is a tsunami risk to terminals, but tank pilings will be in bedrock. Vehicles traffic will be delayed at rail crossings, including emergency vehicles.

Response GP329-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP329-2

Just as Gray's Harbor does not stand alone, Washington is not the only area to be affected by these dangerous trains. The whole Pacific Northwest and the sensitive Columbia Gorge will [illegible]

Response GP329-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

GP330, **Haywood, Susan**

Comment GP330-1

Well, my name is Susan Haywood. And I've been reading over materials on the Westway and Imperium expansion projects. There are many issues that cannot be mitigated that will arise from these projects.

There's a tsunami risk to the terminals. Oh. Tank pilings will be dug to 250 feet. Unfortunately, bedrock is at 200 feet, so tank pilings that are more shallow than that won't do any good.

Response GP330-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP330-2

Vehicular traffic will be delayed at rail crossings due to this project, and that will include emergency vehicles. So when we are restricting emergency vehicles, we are causing loss of life.

Response GP330-2

Comment acknowledged.

Comment GP330-3

Just as Grays Harbor does not stand alone, Washington is not the only area to be affected by these dangerous trains. The whole Pacific Northwest and the sensitive Columbia Gorge will also be victims.

Response GP330-3

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP330-4

Health risks are very important when we're looking at this. We're looking at the health of industries in the communities along the rail corridor and in the ocean off the terminals. The crab fishing could easily be disrupted to the point where there is no more crab fishing here. Seafood could also be rendered inedible by the pollution.

Response GP330-4

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe the potential human health impacts, including those from consumption of contaminated seafood. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Final EIS Chapter 5, *Extended Rail and Vessel Transport*, reflects the addition of information about why the analysis of transportation impacts in the extended study area was addressed more qualitatively and to further describe the potential risks associated with rail and vessel transport in this area. Refer to the Master Response for Geographic Scope of the EIS for more information about the analysis of impacts associated with rail and vessel transport in the extended study area.

Comment GP330-5

Now, air pollution with increased rail traffic, and at the oil terminals, and the train engines, are all huge issues. And these pollutants that will be released, DPM, which is diesel particulate matter, benzene, formaldehyde, and toluene are all serious risks for cancer and are associated with lower birth weight and respiratory death.

Now, in addition to problems with pulmonary function and asthma, they're now looking at autism as being correlated to pollution. And this is the type of pollution that also they are now looking at as a contributing factor to Alzheimer's.

So we're talking about creating a very unhealthy climate for all the people in the Pacific Northwest, because these trains are not just coming on the last 59 miles of track to get here.

Response GP330-5

As described in Draft EIS Chapter 3, Section 3.2, *Air*, based on air quality modeling for conducted by the applicant, onsite emissions of toxic air pollutants under the proposed action would be below the state thresholds identified in WAC 173-460-150. These emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and applicant mitigation that would reduce potential impacts on air quality.

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant. The proposed mitigation measure for air quality monitoring near the project site is no longer warranted.

Comment GP330-6

Another question is train derailments. And there are arguments that trail derailments are not always -- do not always end in fire, but of the last 16 train derailments for which we have a history, 14 out of 16 did end up in fire. And both the crude and the Bakken oil are very volatile.

So we're talking about not only those initial problems with air pollution, but we're also talking about the health risks from fires and toxic exposure to crude oils and burns.

The risks of an oil spill are understated because 30 percent of the last 1,193 spills have been blamed on human error. So when they're citing one tank spill in 1,100 years, they're not living on this planet. We all know that there have been many tank spills and train spills within the last several years.

Response GP330-6

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP330-7

The oil spills in land and water increase the risk of neurotoxicity, autism again, Alzheimer's again, cancer, lung disease, lost cognitive function and endocrine disruption in humans.

Response GP330-7

Refer to Response to Comment GP330-4.

Comment GP330-8

Now, we're talking about the contamination of water and we've talked about seafood. Oil spilled during a train derailment also threatens drinking water sources near the rail lines, so it threatens wells. The rail lines run adjacent to and upstream from Olympia's drinking water source. In Spokane, the sole source aquifer is at risk.

Response GP330-8

Refer to Response to Comment GP330-4.

Comment GP330-9

And again, these trains are going to be passing through and located within population centers, so you're putting a lot of people at risk. The health effects also of noise and vibrations, which cannot be mitigated, increase people's risk for stress.

And longer term injuries from climate change are the ultimate problem. We need to be fostering sustainable energy. And with climate change, we are having heat-related illness and death, allergies, higher healthcare costs, and the extreme weather events that are life-threatening and expensive.

And, of course, this is a racist policy because low-income and communities of color will be disproportionately impacted.

Response GP330-9

Comment acknowledged.

GP331, **Helen**

Comment GP331-1

My name is Helen, and I want to speak specifically on the impact of state parks economically in this county. There is a new study out done by Earth Economics entitled Economic Analysis of Outdoor Recreation at Washington State Parks. Page 24 of 45, table five, lists county by county the analysis of state park lands' incomes and jobs.

Grays Harbor County -- this is a fairly recent survey. Grays Harbor County provides state and local taxes of over five million dollars, and jobs credited to side effects and state parks of almost 845. Total economic contribution, in other words, money spent in the county generated by state parks, is nearly $68 million.

I think this is an important consideration when deciding whether to put in something as risky as oil terminals and having the crude oil which could seriously wipe out 845 jobs with one oops. Thank you.

Response GP331-1

Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed

action. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7.

GP332, **Hepp, Helen**

Comment GP332-1

My name is Helen Hepp, for the record. I live in Montesano. I'm involved with Friends Groups Supporting State Parks. I just came from the conference of Friends of State Parks, and they just handed out this new information. It is accessible from Washington State parks under the subheading of news.

It is an economic analysis of outdoor recreation at Washington State parks, and it is broken out by county.

In Grays Harbor County, the amount of money that is brought in because of parks and recreation, specifically State parks land, is over 67 million. The number of jobs brought in to Grays Harbor is nearly 845. The number of -- amount of State and local taxes is over $5 million.

I spent my life as a teacher and didn't pay much attention to the importance of fishing and hunting, but my students would always come in saying -- oh, is it time?

It's a very big concern to me. Thank you.

Response GP332-1

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP333, **Hepp, Helen**

Comment GP333-1

Regarding the Recreation section: there is a new Economic Analysis of Outdoor Recreation at Washington's States Parks available online from the Washington State Parks website under "News". On page 24 of 45 is a table showing an analysis of benefits by county. According to that table, state & local taxes brought in are over $5 million, economic contributions to our county are nearly $67 million and nearly 845 jobs are created.

Response GP333-1

Comment acknowledged.

GP334, **Herbert, Emily**

Comment GP334-1

The narrow, shallow shipping channel and strong currents put Grays Harbor at high risk of an oil spill. Such would devastate the area economy. Not worth the risk

Response GP334-1

Comment acknowledged.

GP335, **Hesse, Ilsa**

Comment GP335-1

I would very much like to leave a better Pacific North West for our children than we have right now. I visit the Olympic Penn every couple of years, ever since I was a child. The Pacific North West is a beautiful area that we can not risk just to send oil to China.

Response GP335-1

Comment acknowledged.

GP336, **Heverly, Craig**

Comment GP336-1

Pope Francis nailed it: Everything is interconnected and related. So what happens in Aberdeen and Hoquiam doesn't necessarily stay in Aberdeen and Hoquiam. A spill will impact, not only the fragile preserved lands that neighbor the terminals but, ultimately, the Salish Sea -- Washington and British Columbia. I live in Portland and a spill along the Columbia tracks would decimate our iconic river. A derailing and explosion anywhere along the routes of the trains could be catastrophic ecologically and in terms of human life. Consider all the possible catastrophes from the well head to the ports in Asia, not just Aberdeen and Hoquiam. And, most importantly, once the dirty stuff gets to its final destination it will be burned and its CO2 will become part of the thermal shield which threatens to cripple civilization as we have known if for ten thousand years. With the leaders of the world's nations gathering in Paris in a few months to try to put the brakes on this oncoming tsunami of disruption, why are we even thinking of adding to the problem? It might be good for the oil giants; it's not good for the planet.

Response GP336-1

Comment acknowledged.

GP337, **Hightower, Michael**

Comment GP337-1

Name: Michael Hightower
Organization: Public citizen
City/ State/ Zip: Camas, WA 98607

Oil has had its day. The future, a future worth living in, must leave oil behind. I have solar panels on my home. They produce more than we use in "sunny" Washington.

My small town of Camas has schools & papermills next to the train tracks. There is no mitigation that will replace the tragic failure of this plan.

I moved here from Texas and have seen fracking increase pollution, taps for water catching fire & the increase in earthquakes. This terminal would help keep this fracking supporting.

This is not needed. This is oil company greed.

Response GP337-1

Comment acknowledged.

GP338, **Hightower, Mike**

Comment GP338-1

My name is Mike Hightower. And I live in Camas. One of the things that I heard mentioned was in favor of the terminals was some people said that, you know, we were alarmists. But what I'm hearing is testimony from doctors, scientists, and educated people that say this is not right, this is not the way to go.

Jobs. We need jobs. Stimulate the jobs in Camas by putting in solar panels. And that has generated more interest. There's an alternative to oil. I've lived 50 years in Texas before we moved here. Don't trust the oil company. I've seen them fracking where they have -- this was on a line to a person's tap. And the gas is on fire on tap in an earthquake area. It happened. You know, just don't trust the oil company. They're out for greed. We don't need that kind of greed.

The train in Washougal goes by the elementary school. From the parking lot, you can walk 50 feet and touch the railroad track. With these trains, that school is gone. How do you mitigate something like that?

The other one is the Camas paper mill. The train goes by the paper mill. If one of these disasters happens in Camas, that mill is gone. There's a lot more to this than the terminal here.

Thank you.

Response GP338-1

Comment acknowledged.

GP339, **Hildreth, Joan**

Comment GP339-1

I want to thank the Ecology department for attending the Public Hearing at the D and S theatre in Aberdeen this week. It was an enlightening experience for me. I did not have any idea about this problem when I first came to see the area. I fell in love with Gray's Harbor, the shoreline and the wildlife. I went fishing and crabbing and walked on the g here for a very long time. This proposed project is unsafe and unhealthy. I do not want it in my new town. It's unbelievable that this idea has gotten to this stage. The more I learn the more I just shake my head that anyone would even consider this for one minute. re each one of us lives impacts our lives every day. Don't ruin this place with the rolling bombs. Please deny this proposal

Response GP339-1

Comment acknowledged.

GP340, **Hilke, Deborah**

Comment GP340-1

Reading the EISs for the Westway and Imperium Expansion Projects strikes me as equivalent to looking at a medical text that describes the illnesses associated with smoking – it serves as a poignant reminder of how fragile our lives really are, and that there is something we can do to protect ourselves and our loved ones. In the case of the medical text, it is the fragility of a human body. In the case of EIS, it is the fragility our communities and the earth's ecology. After reading a medical text, it is difficult to envision how an individual would willingly take on the risks associated with smoking. After reading the EIS documents, I find it difficult to envision Washington State willingly taking on the risks spelled out in such a stark, clear fashion in the EIS documents. The EIS documents for the two projects tell of disturbing and even truly horrific scenarios. Furthermore, the probability charts point out that several of these scenarios are not low-probability events. These scenarios include cataclysmic explosions, massive oil spills, snarled traffic and yet another nail in the coffin of living up to our treaty obligations as a state and nation with native peoples. It is hard to envision any rationale for inflicting these risks on our state and its citizens, as well as further undermining efforts in the rest of world to address climate change responsibly. In the immediate situation, the communities of Hoquiam and Grays Harbor will be subjected to these excessive risks, so that Canadian oil companies can export these risks to Washington State. These proposals are effectively Canadian exports of risks to humans and the ecology in Washington State that we should not accept. Similarly, if U.S. oil suppliers are intent on exporting oil to China to undercut world environmental efforts, I see no reason why Washington State or its citizens should take on these risks. If for some unfathomable reason, Washington State is obligated to accept such projects, the parties should be required to fully insure against all of the risks over the entire duration of these risks. To me, it seems difficult to believe that the proposers of these projects could profitably proceed if they had to take all of these risks. Anything short of this means the proposal is asking the State of Washington and its citizens to bear the risks for free. That does not make sense to me and I hope it does not make sense to you either. Consider that back in the early 1800s, the DuPont Family certified to its employees the effectiveness of its safety measures by literally living next door to their gunpowder factory. What we have here, are proposals to place Washington State interests at great

risk without any demonstration of good faith by the proposing parties. The proposers are not going to live on the site or drink the water and fish for their dinner in the affected water, but they are perfectly willing to recommend that Washington State citizens and First Nations peoples near these site do so, gratis.

Response GP340-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP341, **Hoeft, Bruce**

Comment GP341-1

10/1/15 testimony at the Satsop Development Park My name is Bruce Hoeft, and I live in Tacoma. I come here a lot, for the landscape, the wildlife, the seafood, and community of friends I have here. Here we are at the Satsop Development Park. Outside agencies who promise big employment and big tax revenues don't always deliver. Reactors 3 and 5 here were going to help repay the two and a quarter billion dollars WPPSS borrowed to fund their nuclear program. But the program went bankrupt. The promise wasn't kept, bond-holders got pennies on the dollar for their investment, which the public, which received nothing, had to pay. I know that's old news. But I'm afraid the public is going to have to pay again. Now we have new promises from the energy sector: a few hundred construction jobs for a year or so. A hundred, maybe more, permanent jobs. But our experience with the construction of the 405 pontoons suggests that those jobs will go to out-of-county workers, not the folks who live here now. And the terminals promise to provide tax revenues. Promise, just like the Satsop nuclear plants... But here's a revenue stream that already exists. It's not a promise: thousands of jobs in hotels, restaurants, gas stations, and tourist shops, all dependent on recreational income that would be destroyed with a large oil spill. Add that to the fishery and shellfishery businesses, and the hundreds of millions of dollars these two sectors provide to the Grays Harbor economy. This existing revenue is put at huge risk for the promise of a hundred of so jobs. I don't see adequate analysis of cost/benefit. The DEIS estimates there's a 0.8% per year chance of a vessel collision spilling 105,000 gallons of crude into the harbor. That low number is kind of meaningless unless you compare it to another number I don't see in the DEIS: how many jobs would be lost, how much income and tax revenue would disappear, and for how long, if

that spill does happen? To provide a meaningful analysis of impact, those numbers need to addressed, and compared with the risk. Bruce Hoeft 508 N 11th St. Tacoma WA 98403

Response GP341-1

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* reflects additional information on the economic and social costs of oil spills. This includes information on derailments and other accidents involving trains carrying crude oil and information on a crude oil spill during marine transport. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP342, **Hoeft, Bruce**

Comment GP342-1

I'd like to thank members of the panel, Mr. Shay. My name is Bruce Hoeft. I live in Tacoma. I come here a lot. I come for the landscape, the wildlife, the seafood, and for the lovely community of friends I have here.

It's been referenced before. Outside agencies who promise big employment, bit tax revenue, I've been here before, and they don't always deliver.

It's old news, but it's still happening today. I'm afraid the public is going to have to pay again as they did for the two and a quarter million dollars -- sorry, billion dollars for the Whoops plant.

Response GP342-1

Comment acknowledged.

Comment GP342-2

We have got new promises from the energy sector here. Two hundred construction jobs for a year or so? A hundred or a couple hundred permanent jobs? But here's a revenue stream that already exists, it's not a promise. There are thousands of jobs in hotels and restaurants, gas stations, tourist shops, all dependent on recreational income will be destroyed in a large oil spill.

Add that to the fishery and shell fishery businesses, and hundreds of millions of dollars these two sectors provide to the Grays Harbor economy. I don't see an adequate analysis of cost benefit.

The DEIS means there's a 0.8 percent chance of a vessel collision, spilling 105,000 gallons of crude into the harbor.

The number is kind of meaningless unless you compare it to another number I don't see in the document. How many jobs would be lost? How much income and tax revenue would disappear? And for how long if the spill does happen?

To provide a meaningful analysis of impact, those numbers need to be addressed and compared with the risks. Thank you.

Response GP342-2

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP343, **Holcomb, Peter**

Comment GP343-1

The Department of Ecology Is a trustee in this case for everyone in Washington, including future generations. As our trustee you have a fiduciary obligation to protect the value of the entire trust property, including the life support system. The life support system of the people for whom you are trustee includes the living systems which provide our food, our air and our enjoyment of the land and water. It includes protection of our climate from killing us and all the minute organism which provide us with food from the sea and land. The living systems which keep us alive must be protected for all future people too, to keep them alive. I conjure you to use the most stringent precautionary principle.

Response GP343-1

Comment acknowledged.

GP344, **Holden, Madronna**

Comment GP344-1

Currently retired, I taught courses on the intersection of cultural and environmental issues at Pacific Northwestern universities for several decades and did grant-funded research on the traditions of the Lower Chehalis (the Su'alemish or Harbor people) beginning in 1976. I want to register my support for the Quinault and Chehalis comments in their objections to oil terminal construction. I strongly object to the statement in the EIS that the construction of this oil terminal on Grays Harbor has no cultural significance. The slated terminal site is one that was intensively utilized by the Su'alemish for harvesting along traditional "fish trails" in various Harbor channels, as well as for the cultural practice of undertaking spirit quests nearby. The name Hoquiam itself is a corruption of the indigenous term Hokiam, meaning "lots of (drift)wood", a descriptive designation of the marshland along the mouth of the Hoquiam River. It was near here that the mother of an elder I worked with in 1976 found her spirit power. As Western scholars are learning, indigenous peoples sustained their peoples' well-being and the ecological abundance of their homeland by linking ecological knowledge with spiritual practice. In particular, sacred sites for power questing in Western Washington are often sited in key and sensitive environmental areas. We would be wise to protect such areas while

we can, not only to uphold our responsibility to local indigenous peoples, but to preserve our ability to learn more about the ecological significance of such sites. The Su'alemish lived in the Hoquiam area for thousands of years, as the recent archeological find of a fish trap at Hoquiam indicates. They did so successfully by assessing their actions for their long term consequences. We would be wise to do likewise. It would certainly run contrary to such wisdom to allow the currently inadequate safety precautions with respect to the possibility of oil spills in the rail transportation corridor of oil incoming to the Harbor terminal. Further, the proposed terminal site is on relatively unstable soils in an earthquake/tsunami prone zone. We should not risk a serious spill based on hoped-for short term economic benefits outweighed by inevitable long term hazards. I use the term "we" in making these comments, since I think of this area as my home in a special way. My parents moved our family here in 1960. My father still lives here, though my mother is deceased. My research in Upper Chehalis and Lower Chehalis territory, in which indigenous peoples shared their traditions with me so generously, gave me a lifelong sense of belonging to the Chehalis River and Grays Harbor area. I urge that we protect this traditional territory of ecologically wise peoples by following their example and caring for our own future generations. Our children will thank us for our wise decision in this respect. Cordially, (Dr.) Madronna Holden

Response GP344-1

Draft EIS Chapter 3, Section 3.11, *Historic and Cultural Preservation*, addresses potential impacts of construction and routine operation of the proposed action on cultural resources. Section 3.12, *Tribal Resources*, addresses potential impacts of construction and routine operation of the proposed action on tribal resources. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on cultural and tribal resources. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP345, **Holder, Lehman**

Comment GP345-1

I oppose the proposed projects by Imperium and Westway and I believe both draft Environmental Impact Statements should identify ALL existing environmental conditions, likely impacts and mitigation measures.

Response GP345-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP346, **Holder, Mary**

Comment GP346-1

As we expressed to you in our scoping comment, although we live in Mount Vernon, WA, several days each spring we and our friends visit the Grays Harbor National Wildlife Refuge, Bottle Beach, Westport, Tokeland, Hoquiam, and Aberdeen to view the thousands of migrating shorebirds on their strenuous northward journeys as well as non-migratory shorebirds, peregrine falcons, eagles, osprey and songbirds. We and our friends spend our "eco" tourist dollars in the communities along

the way, including in Hoquiam and Aberdeen. With each passing year, we have come to love, study and appreciate the National Wildlife Refuges in Washington State and their migratory and non-migratory fish and wildlife. These Refuges enrich our lives and provide important monetary and quality of life values for the local economies and Washington State.

Response GP346-1

Comment acknowledged.

Comment GP346-2

Holder comment on Westway and Imperium DEISs

November 27, 2015

Sent as pdf attachment to online form at
https://public.commentworks.com/cwx/westwayimperiumcommentform/

Re: Comment on Westway and Imperium Expansion Projects Draft Environmental Impact Statements (DEISs)

To: Mr. Brian Shay, City Administrator, City of Hoquiam and Ms. Sally Toteff, Director Southwest Region Office, Washington Department of Ecology

Please accept our comment on the DEISs for the proposed Westway Terminal Company and Imperium Renewables expansion projects.

General Deficiencies in the DEISs

We and many others have detailed the risks of oil spills, explosions, fires, toxic fumes, noise, and other significant adverse impacts that would occur on the way to, from and at these proposed facilities in prior (scoping) comments. The significant risks and consequences from derailment events and impacts of oil spills are undeniable based upon similar incidents occurring across the United States, even as we write this comment on the DEISs. The alarming safety record of crude oil transportation and the volatile nature of the crude oil product that would be received, handled and shipped by the proposed projects ensure that it is not a matter of "if," it is a matter of when such events would occur along the rail route from the oil wells to the projects, at Grays Harbor or in the ocean as a result of the proposed projects if permitted.

The findings in the DEISs for Westway and Imperium oil terminal proposals confirm that the direct, indirect and cumulative risks and consequences of fires, explosions, oil spills, train and vessel accidents, increased train and oil tanker traffic, air pollution, noise, and more would have probable significant adverse impacts on tribal culture and fish and wildlife resources and cannot be fully mitigated. The DEISs already present grounds for denial of the permits for the two projects. Jan Hasselman The Power to Say "No": SEPA's Substantive Authority and Controversial Fossil Fuel Projects, Washington St. L.J., Environmental and Land Use Law Section (August 2015). http://www.wsba.org/~/media/Files/Legal%20Community/Sections/ELUL/Newsletters/August%202015.ashx.

Response GP346-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP346-3

Nevertheless, there are also probable significant adverse impacts on public safety, the built environment and fish and wildlife resources and especially the public property interest in those natural resources some of which the DEISs failed to properly characterize, analyze and disclose. The DEISs fail to adequately consider the uniquely high combustibility of Bakken crude oil; the causes of derailment including the impact of heavy oil trains as contributing to rail failures; the potential of even low-speed train car derailments, punctures, spills, fires and explosions; the inadequate preparedness of local and state first responders; the inadequacy of oil spill cleanup preparedness and equipment in Washington State; the inadequacy of Applicants' and railways' insurance to cover derailment and oil spill incidents; rail inspection failures; risks of fire spreading beyond one train car or oil storage tank in the event of a leak, fire, or explosion; contribution of the proposed projects to carbon pollution and climate change; the impacts on fish and wildlife resources, tribal culture and economies; and many more significant issues.

Although the Final EISs are normally considered the "next step" in this process, the deficiencies in the DEISs are so significant that we request that the DEISs be revised. It seems patently unfair to proceed to Final EISs when the DEISs have withheld full disclosure, study and analysis of significant impacts from the public, thus preventing the public from commenting on them. Nevertheless, in order to ensure your consideration of our comment, any requests herein calling for "revised DEISs" are also intended to apply to "Final EISs" if the Co-Leads fail to revise the DEISs.

Response GP346-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods. Refer to the Master Response for Emergency Response and Planning Gaps for information about the analysis of emergency planning and response capabilities. Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

Comment GP346-4

Law Applicable to the Public's Interest in Natural Resources

Revised DEISs for Westway and Imperium oil terminal proposals must be written to fully disclose all direct, indirect and cumulative significant adverse impacts (including in the extended area) upon public safety, the built and natural environments and including upon all National Wildlife Refuges and the natural resources protected by them and upon all fish and wildlife that could be affected by these projects in light of the laws that apply to these resources. These laws include the Public Trust Doctrine and its historic and state and federal Constitutional underpinnings. Wash. Const. art. I, § 30, and art XVII, § 1. See also RCW 43.21A.010, Legislative declaration of state policy on environment and utilization of natural resources.

In this permitting matter, among other things, harm to the State's tidelands and shorelines from oil spills is recognized by the Co-Leads as a probable significant adverse impact of the two proposed projects. These tidelands and shorelines include Grays Harbor and its estuary, all along the Washington coast and along the Columbia River. The Public Trust Doctrine is applicable to this matter and to those tidelines and shorelines, but its applicability does not end there. Fish and wildlife have long been recognized as protected elements of the Public Trust Doctrine in our country's jurisprudence. William Blackstone, II Commentaries on the Laws of England ch. 1, 222 (1769) (Blackstone confirmed that within the English legal system that certain elements remain in common ownership, unsusceptible to full privatization: "[S]uch are the elements of light, air and water . . . also animals ferae naturae, or of untamable nature . . . "). This ancient common law doctrine means that the permitting authorities must not allow the "privatization" of these publically owned natural resources by, for example, issuing the permits in this matter without fully (100%) mitigating any and all probable significant adverse impacts to all natural resources from either or both of these projects. Illinois Central R.R. Co. v. Illinois, 146 U.S. 387 (1892). (Any grant by the state of control over navigable waters and soils under them "is necessarily revocable, and the exercise of the trust by which the property was held by the state can be resumed at any time. . . . The trust with which they are held, therefore, is governmental, and cannot be alienated . . . . ."). Environmental standards based upon this Doctrine cannot be treated merely as a set of minimum or advisory requirements by the Co-Leads. Because the Public Trust Doctrine is a common law doctrine, it cannot be obliquely repudiated by regulation, permit or statute.

Additionally, the fish and wildlife resources protected by National Wildlife Refuges are considered "trust resources;" that is, they are held in trust in the public interest. These Refuges are specifically created for the conservation of trust species dependent upon them. The trustees of the Public Trust interests in this case have a fiduciary obligation to perform their duties to safeguard fish and wildlife resources, including those protected by the National Wildlife Refuges, for the benefit of all, including succeeding generations. Any probable adverse impacts to the Refuges and their resources must be regarded by the Co-Leads as significant. Moreover, the public trust in fish and wildlife and the legal status of the National Wildlife Refuges and their resources demand that agencies read other statutory laws, for example the Migratory Treaty Act of 1918 and Washington State's laws including SEPA, consistent with the Public Trust Doctrine, rather than just looking for "exceptions" to the laws that they feel support the issuance of permits. Those exceptions where they occur must yield to the public's common law property interest in the natural resources including the fish and wildlife resources where, as here, the natural resources are threatened from probable impacts of private projects. The Public Trust Doctrine and the various Federal and Washington State Constitutional provisions that support it, including the laws that created the National Wildlife Refuges, must be

applied without exception to protect the Grays Harbor National Wildlife Refuge, the Willapa National Wildlife Refuge Complex, the Ridgefield National Wildlife Refuge Complex, the Washington Maritime National Wildlife Refuge, all other National Wildlife Refuges along the rail and vessel route and their associated natural resources all along the rail and shipping routes to and from these proposed facilities. The DEIS discusses only the Grays Harbor National Wildlife Refuge. The other named Refuges, also in harm's way from these projects, share species and/or contribute to overall populations of types of fish and wildlife in the State. Revised DEISs must fully disclose all probable direct, indirect and cumulative adverse impacts of these planned facilities on all Refuges and their fish and wildlife species that could suffer impacts from the projects. Those impacts must be fully mitigated.

Harm to National Wildlife Refuges, Fish and Wildlife

The Westway and Imperium projects place the fish and wildlife dependent upon the National Wildlife Refuges we have identified above at significant risk both from construction and routine operations and from oil train and/or vessel accidents, explosions, fires and oil spills (even in the "extended area"). The DEISs totally ignore the Refuges other than the Grays Harbor National Wildlife Refuge and fail to fully consider and provide adequate mitigation for the short and long-term direct, indirect and cumulative impacts of the projects even on this Refuge. All probable significant impacts from routine operations as well as from accidents and from rail, vessel, or storage tanks on all of the affected Refuges and on other areas such as the Grays Harbor estuary that provide important habitat for fish and wildlife protected by the Public Trust Doctrine must be studied and the impacts expressly disclosed in detail.

While expressly reserving the argument that all Refuges along the rail and vessel routes and all species within them must be addressed in revised DEISs, we discuss here the Grays Harbor Refuge and estuary, with particular focus on shorebirds and their habitat about which we are deeply concerned. The entire Grays Harbor supports the fish and wildlife in the National Wildlife Refuge. The Grays Harbor estuary is designated by the Western Hemisphere Shorebird Reserve Network as a hemispheric reserve of international significance because it is visited by over 500,000 shorebirds annually during spring and fall migrations. Sites in the Western Hemisphere Shorebird Network. http://www.whsrn.org/sites/map-sites/sites-western-hemisphere-shorebird-reserve-network. Accessed May 15, 2014. Grays Harbor's estuary also supports six state-level Important Bird Areas (IBAs) – a fact the DEISs ignored. The Grays Harbor National Wildlife Refuge was established by Congress to protect this critical shorebird habitat and the species that depend on it in trust for present and future generations. Hundreds of thousands of shorebirds use prey species in the Grays Harbor estuary to fuel their migrations. Migrating shorebirds visiting the Grays Harbor area gain up to 30% of their body weight in fat before resuming their long journeys northward. Shorebird species in particular have experienced dramatic population declines over the last decades. A revised DEISs analyses must provide independent studies of the potential impacts on shorebirds dependent upon the health of the Grays Harbor estuary for their survival and the revised DEISs must disclose these impacts.

A number of the migratory shorebirds that stop over at the Grays Harbor estuary are considered species of highest conservation concern. U.S. Fish and Wildlife Service. Birds of Conservation Concern 2008. P. 24. https://www.fws.gov/migratorybirds/NewReportsPublications/SpecialTopics/BCC2008/BCC2008.pdf. Accessed May 15, 2014. Of particular concern to us are the probable impacts of these projects upon migratory and non-migratory shorebirds that depend on the Grays Harbor Refuge and estuary.

The DEISs ignore and fail to disclose impacts on declining shorebird species. As an example of one declining species in particular that must be studied closely in a revised DEIS is the Red Knot, Calidris canutus roselaari. The Red Knot is one of the rarest of the long-distance migrant shorebirds that use the Pacific Flyway. Red Knots undertake long flights during their migration that can span thousands of miles and breed on Wrangel Island, Russia and on tundra in far Northern and Northwest Alaska. They overwinter in Mexico or possibly further south. Buchanan, J.B. and L.J. Salzer, Washington Department of Fish and Wildlife. Red Knot (Calidris canutus) migration on the Pacific coast of the Americas. http://wdfw.wa.gov/publications/01547/wdfw01547.pdf. Accessed May 15, 2014. Grays Harbor is a vital migration stopover point for these birds that feed on bivalves and other benthic invertebrates in the Grays Harbor estuary [Bowerman Basin, Ocosta (Bottle Beach) and Grass Creek] to fuel their return trip to Arctic breeding grounds (Bowerman Basin, Ocosta, Grass Creek). The Willapa National Wildlife Refuge Complex is also a vital stopover area. Carmona, R., N. Arce, V. Ayala-Perez, et al. 2013. Red Knot Calidris canutus roselaari migration connectivity, abundance and non-breeding distribution along the Pacific coast of the Americas. Wader Study Group Bull. 120(3): 168–180. http://www.researchgate.net/publication/264495809_Red_Knot_Calidris_canutus_roselaari_migration_connectivity_abundance_and_non-breeding_distribution_along_the_Pacific_coast_of_the_Americas. Accessed Nov. 23, 2015. This species has the smallest of all Knot populations. Hernández-Alvarez, A., Carmona, R. & Arce, N. 2013. Feeding ecology of Red Knots Calidris canutus roselaari at Golfo de Santa Clara, Sonora, Mexico. Wader Study Group Bull. 120(3): 194–201. http://www.researchgate.net/publication/274868585_Feeding_ecology_of_Red_Knots_Calidris_canutus_roselaari_at_Golfo_de_Santa_Clara_Sonora_Mexico. Accessed November 23. 2015. The Red Knots migrate at the population level – that means an oil spill, whether before or during fall or spring migration, affecting the Red Knots could destroy the entire species. The DEISs shouldb e revised to recognize and analyze that information. Although the U.S. Fish and Wildlife Service declined to list this species that was petitioned for listing along with the eastern migratory rufa Red Knot (recently listed as threatened) based upon lack of information about its wintering location(s), it is well known to be a sensitive and declining shorebird species and its migration occurrence in the Grays Harbor estuary is being intensively monitored by biologists as the above referenced studies illustrate.

Other declining shorebirds in addition to the Red Knot that must be studied more closely by the revised DEISs include, but are not limited to: Black-bellied Plover, Semi-palmated Plover, Whimbrel, Ruddy Turnstone, Sanderling, Semi-palmated Sandpiper, Least Sandpiper, and Short-billed Dowitcher. Like the Red Knot, some of these species saw significant population losses in the late 19th and early 20th centuries due to hunting and, more recently, from habitat loss. These species are especially vulnerable to disastrous decline from oil spills and these impacts should have been disclosed in the DEISs. The revised DEISs must include these as “sensitive species” even if they are not currently federally listed in light of their current status, the severe threats to them from these projects and the Public Trust interest in their preservation for current and future generations. Impacts upon their essential migration habitat in both the Grays Harbor estuary and Willapa National Wildlife Refuge Complex must be disclosed.

The DEISs apparently arbitrarily limited the study areas for animals affected by construction and routine operation to the areas “on and near the project site that could be affected by construction and routine operations at the project site” and “animals that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P) rail line and vessel transport through

Grays Harbor out to 3 nautical miles from the mouth of the harbor." (Section 3.5.1, Emphasis added.) Significantly, the Co-Leads completely failed to consider the cumulative impacts on the National Wildlife Refuges and their wildlife of routine operations in either Chapter 3 or 6 of the DEISs - important because the routine operation of the rail line, terminals and vessel route described by the Co-Leads would involve small, medium or large releases of oil and other contaminants that may singly harm fish and wildlife species or build up over time to cause harm, degrade species' food supply and destroy viable habitat. The DEISs conclude incorrectly that the likelihood of a spill occurrence is only moderately likely to likely, and the potential environmental impact is moderate to severe within the study area. As we noted earlier, it is not a matter of if a spill occurs, it is a matter of when and even how (that is, would it be accompanied by an explosion or fire caused by transporting and handling volatile Bakken crude). The DEISs then proceed to defy the logic of their own findings by determining that there would be no "unavoidable and significant adverse impacts" of the projects. Those determinations must be revised in the DEISs to reflect the full impacts of these projects.

The "mitigation measures" of Chapter 3 (repeated in Chapter 4.7 on p. 9) offered by Applicants for the proposed actions to reduce impacts on shorebirds are worthy of Johnathon Swift at his most ironic. They are preposterous.

3.5.7.1 Voluntary Measures and Design Features. The following voluntary measures and design features would reduce impacts on animals. To reduce the risk of spills affecting migratory birds during peak spring migration (typically 2 weeks), the applicant will coordinate with the City of Hoquiam to receive advance notice of the date for the annual Grays Harbor Shorebird Festival and will halt crude oil vessel-loading operations for a period of 2 weeks each year overlapping with the event.

That does not even attempt to protect the shorebirds; it may or may not protect the City of Hoquiam's financial interest in the Shorebird Festival. Birds such as the highly sensitive Red Knot do not even typically migrate through the area during the days of this Festival. Nor does this protect non-migratory shorebirds. The two weeks around the Festival do not include the fall migration period, also a "key" migration period (despite the implication to the contrary in section 4.7, p. 9). An oil spill may occur months, even years before the Festival and contaminate the estuary to the detriment and destruction of the many species of migratory and non-migratory shorebirds and the organisms upon which they feed. The Department of Ecology must and protect the wildlife, not the sensibilities of Festival goers or the City of Hoquiam's tourist economy for only two weeks of each year.

The DEISs are also inadequate because the Co-leads relied upon a paper review of limited information sources to determine the occurrence of state and federal species of conservation concern and the location of state and federal protected areas. Additional credible scientific literature should have been considered by the Co-leads and detailed baseline studies performed by independent biologists should have been performed concerning fish and wildlife species and impacts upon them. The studies should have included status determinations for fish and wildlife in Grays Harbor and in nearshore Pacific Ocean waters. The revised DEISs must include detailed, fine-scale spatial information including the delineation and GIS mapping of landuse, landcover, shoreline use, existing habitats, sensitive areas, species (marine and terrestrial plants, seaweeds, marine macroinvertebrates, marine and freshwater fish, and all wildlife) including species concentration areas and seasonal concentrations. A comprehensive scientific baseline study which includes field data collection over a minimum of a twelve month period must be included to document all species

presence, seasonal occurrence, habitat use, concentration areas, biological communities, and areas, species or communities of ecological significance. The ecological function and values of this area must be fully identified and described. Based upon such studies the Co-Leads must fully evaluate all impacts of construction and operation of the project on fish and wildlife including cumulative impacts of noise, lighting, loss of habitat, spills, release of harmful aquatic species and all other impacts.

Response GP346-4

The impacts of the proposed action have been addressed under the requirements of SEPA and associated regulations. Federal, state, and local statutes and regulations that may apply to the proposed action are summarized in each Draft EIS resource section. Refer to the Master Response for Purpose and Focus of the EIS and the Master Response for Geographic Scope of the EIS for additional information about the scope of the EIS.

The Important Bird Area program carries no regulatory authority and imposes no legal restrictions or management requirements on any property (public or private). However, the six Important Bird Areas have been added to Final EIS Section, 3.5 *Animals*, to note their significance in addition to the other important areas of Grays Harbor that are currently listed and described in the Draft EIS.

The commenter does not elaborate on what is meant by the "DEISs analyses must provide independent studies of the potential impacts on shorebirds dependent upon the health of the Grays Harbor estuary for their survival and the revised DEISs must disclose these impacts." The purpose of the Draft EIS is not to provide an extensive or exhaustive list of all species that could be affected by the proposed action. SEPA regulations for EIS content specifically state that "inventories of species should be avoided, although rare, threatened, or endangered species should be indicated" (WAC 197-11-440(6)(c)(i)). As such, there is an emphasis in the Draft EIS on identifying and focusing more on rare, threatened, or endangered species, which are listed in Draft EIS Appendix F, *Special-Status Species*, and described throughout Draft EIS Section 3.5, *Animals*. However, the Draft EIS still mentions many other non-special-status species and groups of species in Section 3.5, *Animals,* such as the red knot. Birds of Conservation Concern have been added to Final EIS Section 3.5 and Appendix F to address the commenter's concern with these species.

Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses potential impacts from construction and routine operation of the proposed action. Increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) and potential consequences (e.g., release of crude oil) are addressed in Chapter 4, *Environmental Health and Safety.*

The analysis in Chapter 4 considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor

Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification.

Conducting detailed baseline studies and status determinations in the study area would not change the conclusions of the Draft EIS because existing information sufficiently describes the affected environment for an EIS-level analysis.

Comment GP346-5

Chapter 3's statement of the No Action Alternative for animals is flawed. Section 3.5.5.1 makes the astounding statement that no analysis is needed of a No Action alternative because although the proposed action would not occur "it is assumed that increased growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017-2037). Such development could result in impacts similar to those described for the proposed action." The Department of Ecology has long maintained that it is not required to consider future actions or events that are "speculative." How is it then that the DEIS can found its No Action Alternative upon fuzzy mere speculation, and an "if the applicant doesn't do it, someone else will" argument? It is unreasonable for the Co-Leads to assume that another industrial project at the site would result in the handling of volatile Bakken or other crude oil that could lead to oil spills, fires explosions etc. What information/evidence supports this conclusion? Is there a plan, report, application? And why would that plan not be subject to the same legal requirements that the DEISs assume away today? This problem is perpetuated in Chapter 5, concerning the "extended area". 5.5.1.1: "Under the no-action alternative potential impacts from increased rail traffic could occur."

Response GP346-5

The analysis of the no-action alternative does not assume that a future development similar to the proposed action would occur at the project site. Refer to the Master Response for Baseline and No-Action Alternative.

Comment GP346-6

Additionally, the DEISs analyses considered impacts over a 20-year period (2017 to 2037) to account for future growth and development." The Co-Leads must consider impacts of the projects over the life of the projects, not over an arbitrary time period. A legitimate "No Action Alternative" must be prepared for the revised DEISs that would be simply that the projects are not constructed and Applicants would continue to operate their existing facilities.

Response GP346-6

As noted in Final EIS Chapter 3, Section 3.0, *Introduction*, the EIS analyzes the impacts that could occur over the lifetime of the proposed facilities. Potential impacts were quantitatively evaluated in 2017—the anticipated first year of operation—and 2037 to account for future growth and development. This approach provides context to decision-makers about how the impacts of operations would evolve over a reasonably foreseeable period. This is particularly relevant for transportation- and risk-related impacts that can evolve over time because of reasonably foreseeable growth, planned infrastructure changes, and phased regulatory requirements for

improved transportation efficiency and safety. Refer to the Master Response for Baseline and No-Action Alternative.

Comment GP346-7

Chapter 4 of the DEISs concerns the impacts of small, medium and large oil spills as well as fires and explosions in the arbitrarily limited study area. Chapter 4 of the DEISs determines rail transportation of oil could result in "[a] large oil spill or explosion [that] would likely cause unavoidable and significant adverse environmental impacts having large consequences to the environment." Also with regard to a vessel accident: "[a] large oil spill or explosion would likely cause unavoidable and significant adverse environmental impacts. … the likelihood of a large spill or related explosion is low; however, the potential for significant consequences to the environment and human health in the case of a large spill or explosion is high." Section 4.6.4. As described in Chapter 4.7, the impacts of explosions and oil spills on resources within the DEISs limited "study area," including shorebirds and other wildlife and the ecosystems upon which they depend would be devastating and cannot be mitigated. The section fails to discuss impacts of repeated small and medium spills on the components of the natural environment, and Chapter 6 fails to discuss the cumulative impacts of these. The revised DEISs must include a full independent analysis of impacts of small and medium spills. It is likely these could be devastating and could be fully mitigated especially given the characteristics of the crude oil products.

Gambling with Public Safety and the Environment

Chapter 4.7 of the DEISs suggests a willingness to gamble with oil by rail and vessel disasters. The chapter repeats with respect to each component of Environmental Health and Safety discussed: "However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, fire, or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion (Emphasis added). " Yet significantly they go no further to recommend the no action alternative and denial of the permits. Are the Co-Leads suggesting that the permits can still be issued in this circumstance and that a roll of the dice is acceptable when people's lives, the natural environment and economies are at stake? Is there an unwritten percentage of mitigation, that is less than full or complete mitigation, that the Co-Leads find acceptable but are presently keeping from the public? The public cannot evaluate or comment on an unwritten plan. The failure to disclose information results in a fundamentally unfair public process. It only takes one oil spill to cause long-term or permanent impairment of sensitive environments, one explosion to kill people and one fire to destroy property. Any one of these events can destroy local economies and in turn, create havoc for the state's economy. Well documented oil by rail accidents have had these impacts. It is well known that vessel accidents would also devastate the environment: in 1988, one year before the Exxon Valdez, the Nestucca barge 231,000-gallon spill of heavy oil off Grays Harbor fouled beaches from Oregon to Vancouver Island and killed 56,000 sea birds. In light of the dire consequences of a rail or vessel accident the revised DEISs must recommend a no action alternative and denial of the permits.

Artificial Division of Areas Discussed in DEISs

We are troubled by the artificial and inexplicable division in the DEISs between the "study area"(some 59 miles along the rail route to the project and vessel route from the project) and the "extended area." By treating these separately, the Co-Leads have failed to disclose and analyze in adequate detail the unique risks and consequences of rail accidents for communities, waterways and

landscapes along the "extended area" rail and vessel routes. Also significantly as a result of this artificial division on areas impacted, the DEISs fail to recognize and disclose significant adverse impacts to National Wildlife Refuges and other important fish and wildlife areas for the extended area. Chapter 5 of the DEISs concludes that the impacts along the BNSF rail line would be "similar" to that along the PS&P rail line and "roughly proportional to the incremental increase in traffic under the proposed action." Similar reasoning is applied to vessel traffic impacts in an extended vessel area. It is unreasonable to assume that, for example, the impacts of a train derailment and explosion on a small community along the Columbia Gorge that is right beside the railroad line would be the same as impacts on an area near the PS&P rail line and that impacts from such an event that involved an oil spill into the Columbia River and its fish and wildlife species would be the same as an oil spill in Grays Harbor. The Columbia Gorge area in particular is very unique and even wind conditions there vis a vis the impact of emissions from trains on air quality and water quality should have been specifically analyzed in the DEISs. Chapter 5 is also apparently based primarily upon a review of state-created studies and a reprise of information contained in them. This is insufficient. Real studies of probable significant adverse impacts on real communities and natural resources must be conducted upon which to base EISs.

Response GP346-7

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion. The Final EIS has been revised to further clarify the relative risks related to the proposed action in the study area and the extended study area. For more information about the analysis of risks in the extended study area, refer to the Master Response for Geographic Scope of the EIS.

Comment GP346-8

Cumulative:" the Opposite of "Incremental"

Section 5.6 of the DEISs apparently abolishes the cumulative impacts analysis requirement from SEPA for the Extended Area. It provides: "The increase in rail and vessel traffic in the extended study area from the proposed action is small relative to the existing and anticipated future traffic that will occur without the projects." … "Therefore, no mitigation is proposed in the extended study area." Jaws drop to behold cumulative impact equated to its diametrical opposite, incremental impact.

Moreover, it is difficult to reconcile the meaning and intent of this section with the one that follows, section 5.7, which correctly states that the consequences of rail and vessel accidents cannot be mitigated. SEPA does not allow the Co-Leads to consider a project's size and effect in relation to other projects. A cumulative impacts analysis demands that the increase in rail and vessel traffic be considered in conjunction with all existing and reasonably foreseeable future rail and vessel traffic

(the latter must include all planned future crude oil and coal transportation projects in the extended area). Chapter 6 of the DEISs compounds the problem and creates an additional one: it writes consideration of fish and wildlife impacts and impacts on the National Wildlife Refuges along the rail route out of SEPA (see list in section 6.5.8.1). Section 6.5.8.2 ignores vessel cumulative impacts in the Extended Area and fails to consider vessel traffic impacts on National Wildlife Refuges. The revised DEISs must correctly apply SEPA's indirect and cumulative impacts provisions in the Extended Area and to the Refuges. While the approach taken by the Co-Leads may have eased the burden of writing about these impacts, SEPA does not allow conclusions to be based upon analogies and ill-defined proportionalities.

Additionally, the DEISs fail to consider the projects' cumulative effects on climate change. These new fossil fuel projects would have significant cumulative impacts on greenhouse gases in the atmosphere that would result in rising sea levels (this would particularly impact shorebirds) and ocean acidification (this would particularly affect shellfish and other fisheries in Washington State). The revised DEISs must evaluate the cumulative emissions of greenhouse gases into the atmosphere not only from rail and vessel transportation and at the terminal sites but from the oil extraction sites both in the U.S. and Canada to the final refining and use end-point over the life of each project.

Response GP346-8

For the reasons discussed in the Master Response for Geographic Scope of the EIS, the impacts in the extended study area are addressed qualitatively. Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, acknowledge that the proposed action could increase the likelihood of rail and vessel incidents involving an oil spill, fire, or explosion, both individually and cumulatively, in the extended study area. However, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions or the no-action alternative, and as described in Final EIS Chapter 4, Section 4.7, *Impacts on Resources*.

Final EIS Section 4.7 has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, have been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Comment GP346-9

DEISs Ignore Significant Economic Impacts

The National Wildlife Refuges provide significant support for local economies. Large numbers of tourists visit the San Juan Islands, the Columbia River, and the coast of Washington State each year because of their natural beauty and abundance of wildlife. In 2014 alone, Washington residents took

an estimated 4.1 million trips to their state's coast, making an estimated $481 million in direct trip expenditures. 35.6% of these 4.1 million trips were taken to Grays Harbor County as this area is a major hub of coastal and ocean recreation. Each spring, the Grays Harbor Shorebird Festival attracts visitors, including ourselves, from around the world to view and photograph the astounding numbers of migrating shorebirds at the Grays Harbor National Wildlife Refuge and around the estuary. Grays Harbor is well-known as one of the top destinations nationwide to view birds. In addition to wildlife observation and fishing, the Refuges provide other recreational opportunities such as hunting, boating, and hiking. Local businesses depend on the income from the many visitors to these areas. Economic Division of the U.S. Department of Interior entitled Banking on Nature: The Economic Benefits to Local Communities of National Wildlife Refuge Visitation. October 2013. http://www.doi.gov/news/loader.cfm?csModule=security/getfile&pageid=380921. These economic benefits would be lost, likely permanently, if an oil spill or other disaster occurred on the way to, at or from the Westway or Imperium terminals. The revised DEISs must recognize and analyze the probable significant adverse indirect and cumulative impacts on local economies from an accident that would harm one or more of the National Wildlife Refuges along the rail or shipping route.

Conclusion

The impacts we have raised in these comments cannot or would not be mitigated, or mitigation would be ineffective to prevent or remediate significant environmental harm. The DEISs themselves acknowledge repeatedly that a number of significant adverse impacts cannot be fully mitigated. The permitting agencies must fulfill their fiduciary obligations under the common law Public Trust Doctrine to protect the environment against substantial impairment that would result from these projects. Particularly in light of that Doctrine, unless these direct, indirect and cumulative impacts, singly and in combination, would be fully mitigated, the revised DEISs must recommend, as we do, selection of a no action alternative and denial of permits for the proposed Westway and Imperium oil terminals.

Finally, we agree with many others who are submitting comments on the DEISs that there are better, safer and more reliable ways to meet our future energy needs than these two highly risky and unquestionably dangerous projects. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming. Building more large infrastructure for yesterday's energy is the wrong path to meet today's energy needs. Approval of these projects would be a significant economic and environmental gamble for Grays Harbor. We strongly urge you not to gamble with the safety, health, and environmental and economic well-being of our state's citizens and its unique natural resources. Instead, we ask that you fulfill your duties as trustees of the Public Trust and protect our state and its natural resources, including the atmosphere, for the present and future generations, by denying these permits.

Sincerely,

Phillip and Mary Ruth Holder
201 S. 7th St.
Mount Vernon, WA 98274

Response GP346-9

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 to reduce

the likelihood of a spill reaching the environment and the potential impacts if an incident occurs at the terminal, along the PS&P rail line, or within Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion.

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* reflects additional information on the economic and social costs of oil spills. This includes information on accidents and spills, and information on crude oil spill during marine transport. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP347, **Holm, Patricia (Confronting the Climate Crisis)**

Comment GP347-1

These terminals should not be expanded. The risk will mostly be born by the public and current businesses associated with the environment, like fishing, shell fish industries, recreation.

The draft statement does not say any of the risks can be fully remediated. The draft does not address the fact that there are no insurance companies that will insure the impacts created by a spill to Washington State waters or lands. An oil spill from a train could kill (incinerate many people, as one has in Canada has). Spills can only be retrieved at low percentages of the oil spilled. The costs of explosions and spills are huge, in the billions of dollars. Our State cannot pay for this, we can't even pay the proper costs of education of our children at this time. The profits will be going to the oil companies not the people. A few jobs may be offered, but the many jobs lost do not make up the difference.

Response GP347-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that

would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP347-2

The draft addresses trying to slow down trains near towns. What about the people living in rural areas? Should their lives be counted as less? No, we do not want these trains slowing down emergency vehicles, wherever they are. We do not want the risks to any people living near the tracks.

Response GP347-2

As stated in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, rail traffic is subject to various regulatory requirements including allowable speed limits. The PS&P tracks are registered as Class 2 tracks with an overall maximum speed of 25 miles per hour for freight trains; however, the speed limit is lower in many portions of the track. Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*, presents the analysis of risk of oil spills, fires, and explosions during rail transport related to the proposed action. Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, considers impacts on emergency vehicle access.

Comment GP347-3

We live in an earthquake/tusami zone. We already have many risks in our lives. We do not need more. The draft states the risks are small, even a small risk is too much.

Response GP347-3

Comment acknowledged.

Comment GP347-4

We cannot mitigate the costs of the climate being filled with even more carbon. Wherever it is burned, it will affect us here in Washington. We share one breathable climate, one earth. Let's protect it by investing more in wind and solar power. These terminals that are planned to be built will be there for many years, we do not have many years to transition to other fuels. Already we are experiencing historic droughts, numerous forest fires, flooding. This is costing our State a lot of money. Its our taxes that are paying for these 'natural disasters' caused by climate change and our poor agricultural practices and the continued burning of fossil fuels. We do not need to add more carbon to our world by allowing these terminals to be built. There is no mitigation for all of these concerns. Stop the terminals from being built. The risks are too great for all of us.

Response GP347-4

Comment acknowledged.

GP348, **Holz, Thomas**

Comment GP348-1

Enabling the continued burning of fossil fuel has no trivial consequences. If we do not end this practice of supporting human development, we are destroying earth's capacity to sustain us. Please do not allow these projects.

Response GP348-1

Comment acknowledged.

GP349, **Howe, David**

Comment GP349-1

Increasing the capacity to store and transport oil is not in the best interests of the planet. The planet will be more hospitable to humans and other creatures if we emphasize sequestering more fossil fuel rather than storing and transporting more fossil fuel to expedite the burning of fossil fuel.

Response GP349-1

Comment acknowledged.

GP350, **Hughes, Nelson**

Comment GP350-1

My name is Nelson Hughes. Me and my friend, Brian, we came here from Portland, Oregon. I don't know much about Aberdeen. I do know simple things. A large portion of your economy is based on fisheries, over 50 percent of you I believe. And these people are hard working people.

The amount of jobs that are going to be created for this project, I really don't think is that substantial. And I think most of you agree with me deep down in your hearts. And like the harbor people who work in the fishing industry, it's going to take tough solutions to come up to the right solution. So I encourage you to think and work together and come up with the right solution.

Thank you.

Response GP350-1

Comment acknowledged.

GP351, **Humphrey, John**

Comment GP351-1

Just stop. Stop ravaging the natural environment for corporate gain. At least find a location that has already be decimated for the same purpose. Make a stand and say no more. Be a part of the solution. You must find this continued destruction of our delicate and beautiful eco-system a little repulsive,

right? Pay no mind to the wildlife, pay no mind to the loss of wilderness, pay no mind to our children and grandchildren. Really? Just say no. Become part of a better solution.

Response GP351-1

Comment acknowledged.

GP352, **Hunter, Rhonda**

Comment GP352-1

My Comments are attached along with 2 photos. Please deny the permits for Westway and Imperium Expansion Projects, at least in part based on my attached comments.

WESTWAY & IMPERIUM EXPANSION PROJECTS – DEIS COMMENTS: Rhonda Hunter

Today, Nov. 30, as I write this, Heads of State from about 120 countries are gathered in Paris to forge a global agreement to slow climate change and our fossil fuel emissions causing it. 100's of 1,000's of people around the world in 175 countries are marching to demand action to slow climate change, including leaving fossil fuels in the ground. Current fossil fuel reserves amount to more than 5 TIMES the amount we can safely burn and still keep a livable climate.

These 2 proposals (Westway & Imperium) will clearly lead to more greenhouse gas emissions when the resulting oil is burned and SEPA requires those emissions to be taken into account in the EIS. Exporting and burning more fossil fuels / oil is the exact opposite of the direction we need to move, which is toward clean renewable energy.

In the green Pacific Northwest, we cannot allow massive fossil fuel export rail and shipping terminals to hasten climate disaster, just so a few extremely rich corporations can make even more obscene profits, while the deep risks are borne by the rest of us. (You know they are lobbying Congress to clear the path for oil exports, and allowing Westway & Imperium will only encourage Big Oil to try harder to export oil.)

[Photos reviewed but not reproduced.]

Response GP352-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively.

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and the likely destinations of crude oil shipped through the proposed facilities.

Comment GP352-2

But we/you are in luck!! Because the Westway & Imperium DEIS's clearly lay out grounds for refusal of these projects!

I will not even try to outline all the additional reasons why these proposals should be denied, but here are a few key points:

Risk of Spills & Explosions

On the RISK 'slide-bar' graphic of small to large Spills, the likelihood of incidents or Fire/Explosion ranges from '*somewhat likely*' to '*highly likely*'. But whatever the likelihood, the Potential Environmental Impacts range almost exclusively in the ***Extremely Severe*** category. This risk is too great. Say No.

These mile-long oil trains rumble down river valleys and alongside major congested freeways, through communities, residential neighborhoods, past schools, shopping centers and business districts. There is no protection from risk of spill or explosion and we have already seen those happen across the US & Canada, even with the new double-shell oil tanker cars (apparntly when it gets colder). Our railroad tracks are not in stable shape to safely take this additional heavy rail traffic. Please say No.

Even the DEIS offers only this totally inadequate response to reducing the impacts of spills, fires or explosions at the terminals themselves in Grays Harbor: "Study" how to …., "Identify"…financial responsibility for spill contingency plans, "contact the tribes" in case of spills, "Train" responders in a ONE DAY workshop, every year. For the trains themselves, the response is equally inadequate…it's all after the fact. Not prevention, only 'training' for spills which are assumed to happen.

And how do they propose to reduce risks or impacts of fire & explosion? With pitifully inadequate responses that have never fully prevented these incidents before. And they can't be serious that a 'foam truck' in Elma is the answer for fighting a full explosion on oil trains….Even advanced fire fighters can't get close enough to manage that disaster. They can only stand at a distance and watch it burn (after people have died). First Responders personally told me this last winter during testimony at the Legislature on the proposed oil train safety rules.

SO IF THEY CAN'T SIGNIFICANTLY REDUCE OR MITIGATE THIS RISK, THE PROPOSALS SHOULD BE DENIED.

Oil Spills Cannot be Cleaned Up

I was a young marine biology student at the Santa Barbara Oil Spill in 1969 and saw disaster first-hand. Cleanup after inevitable spills historically looks like this:

Exxon Valdez: This tanker spilled 25 years ago in Alaska and Prince William Sound has still not fully recovered. Despite the extensive cleanup attempts, less than ten percent of the oil was recovered and a study conducted by NOAA determined that as of early 2007 more than 26 thousand U.S. gallons (98 m3) of oil remain in the sandy soil of the contaminated shoreline, declining at a rate of less than 4% per year. In 2003, fifteen years after the spill, a team from the University of North Carolina found that the remaining oil was lasting far longer than anticipated, declaring that tidal shoreline habitats will take an estimated 30 more years to recover. Some of the oil does not appear to have biodegraded at all. A USGS scientist who analyses the remaining oil along the coastline states that it remains among rocks and between tide marks. "The oil mixes with seawater and forms an emulsion...Left out, the surface crusts over but the inside still has the consistency of mayonnaise".

Deep Water Horizon: This well blew out in 2010 and BP couldn't clean up that disaster. Now Gulf Coast estuaries and fisheries are still polluted. In 2013, researchers found that oil on the bottom of the seafloor did not seem to be degrading, and observed a phenomenon called a "dirty blizzard": oil in the water column began clumping around suspended sediments, and falling to the ocean floor in an "underwater rain of oily particles." The result could have long-term effects because oil could

remain in the food chain for generations. A 2015 study by the National Oceanic and Atmospheric Administration, published in PLOS ONE, links the sharp increase in dolphin deaths to the Deepwater Horizon oil spill. Or course, there is much more damage all along the Gulf Coast than I can relate here. We do not want a disaster like this along our own valuable Northwest shores and marine environments.

Response GP352-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur result from an oil spill, fire, or explosion.

Comment GP352-3

SO SINCE OIL SPILLS CANNOT BE CLEANED UP & ARE LONG-LASTING AND DEVASTATING TO MARINE (AND RIVER) ECOSYSTEMS (AND THE LOCAL ECONOMIES DEPENDANT ON THEM), THESE 2 PROPOSALS FOR HIGH VOLUME OIL TRAFFIC SHOULD BE DENIED.

Response GP352-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP352-4

Local Economy at Risk

Local folks in Grays Harbor (and along the Columbia River and Chehalis River) rely on fish, shellfish, Bowerman Basin Shorebirds and the draw of eco-tourism for their economy. All of that is put at high risk if these 2 proposals are permitted. This DEIS should be extended to cover ALL the communities at risk from mile-long oil trains entering our state in Spokane and traveling down our river valleys and through our communities. Because the risks are not limited to Grays Harbor, but borne by people and ecosystems all along the route to Grays Harbor.

And who benefits? Basically just wealthy oil companies which will quickly spin off shell companies to go bankrupt before paying full amounts for cleanup, which cannot be fully accomplished anyway. There is no insurance to cover this level of risk. WE taxpayers assume the financial risk, not the oil companies.

THERE IS NO INSURANCE OR MITIGATION AGAINST THIS RISK. SO THE PROPOSALS SHOULD BE DENIED.

Response GP352-4

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6, *Cumulative Impacts*, have been revised to clarify the potential impacts in the extended study area. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP352-5

Greater Volume = Greater Risk

If these projects were to be approved, there are no restraints on the volume of oil moved by rail or stored for marine tanker export. So as the volume inevitably rises, so does the risk. That is not addressed in this DEIS, so the risks (while dire) are actually under-represented in the DEIS. Historically, once corporations have a foot in the door, they expand oil facilities, (which is what our own Port of Vancouver found out in a leaked corporate memo stating that exact intention.)

SINCE THE RISKS ARE LIKELY TO BE EVEN GREATER THAN THIS DEIS STATES, WITH MORE OIL MOVED THROUGH THESE FACILITIES, THE PROJECTS SHOULD BE DENIED.

Response GP352-5

As noted in the Master Response for Project Objectives and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant. Draft EIS Chapter 2, *Proposed Action and Alternatives*, describes the type of material and approximate volumes to be transported based on this information. The City of Hoquiam will specify maximum throughput in the conditions of a shoreline development permit. In addition, other permit approvals could identify the maximum allowable (permitted) throughput of the facility. Any increase in annual throughput capacity would require revised or new permits or plans.

Comment GP352-6

Oil Train Threats to My Own Home and Life

Lastly, on a much more personal note, my home is on 3+ acres bordering a railroad track that I thought was outside the zone for these oil trains. After all, the direct routes don't include my tracks. So imagine my horror when I found these oil train cars sidetracked near my home, after traveling down my own track. Because I AM in the ½ mile blast / kill zone, should one of these derail and explode. I have personally heard fatal derailments at the crossing right behind my own home.

I am attaching photos so you can see that in addition to our homes, there is the I-5 overpass (a key state economic arterial) at one end of the oil cars, and a propane tank farm at the other. This sidetrack is at Exit 95, on I-5.

So, overall, to the decision-makers in City of Hoquiam, Department of Ecology, and hopefully ultimately Governor Jay Inslee, PLEASE DENY THE PERMITS FOR THESE ILL-CONSIDERED AND EXTREMELY HIGH RISK PROPOSALS OF WESTWAY & IMPERIUM EXPANSION PROJECTS.

Thank you for taking these comments seriously and acting on them.

Rhonda Hunter
4425 140th Ave SW
Rochester, WA 985779 current

See original attachments for photos [Photos reviewed but not reproduced.]

Response GP352-6

Comment acknowledged.

GP353, **Hunter, Rhonda**

Comment GP353-1

PLEASE REJECT BOTH IMPERIUM AND WESTWAY PROPOSALS, BASED ON THE UNMITIGATED RISKS THEY POSE TO OUR PEOPLE AND ENVIRONMENT, WHICH YOUR MISSION REQUIRES YOU TO PROTECT. AS A WOMAN OF FAITH, I URGE YOU TO FOLLOW THE MORAL COMPASS THAT POINTS THE WAY TO PROTECTING, NOT DESTROYING LIFE ALONG OUR WATERWAYS AND RAILWAYS, ESPECIALLY FROM INEVITABLE SPILLS & EXPLOSIONS. EVEN THE NEW DOUBLE-SHELLED TANKER RAIL CARS HAVE REPEATEDLY EXPLODED WHEN DERAILED ACROSS THE U.S. & CANADA,…SOMETIMES IN POPULATED AREAS – RESULTING IN DEATH OF INNOCENT PEOPLE. WHERE ARE WE WILLING TO PUT INNOCENT PEOPLE AT RISK? ON RAILWAYS RUNNING NEAR SCHOOLS, FREEWAYS, NEIGHBORHOODS? PLEASE DO NOT ALLOW BIG OIL $$ TO DICTATE OUR FUTURE. PLEASE STAND ON THE COURAGE OF YOUR CONVICTIONS AND REJECT THE PROPOSALS FOR IMPERIUM AND WESTWAY.

Response GP353-1

Comment acknowledged.

GP354, **Hunter, Rhonda**

Comment GP354-1

Hello, my name is Rhonda Hunter. I'm a ecosystems biologist. My own property borders the railroad tracks within a blast zone, kill zone. I was in Santa Barbara in 1969 when an offshore oil rig blew out and covered the beaches deep in raw crude oil. All the marine life I was studying was killed with thick, stinky crude.

Later I helped conduct research on Grays Harbor shorebirds here, which Bowerman Basin is a major shorebird feeding area. They fly from Central and South America, stop in San Francisco, and then

here, on their way to Alaska breeding areas. The Shorebird Festival is now an economic benefit for this area.

Spills will happen if these two projects are allowed to move forward. A spill will destroy shorebird habitat, and shellfish, and other life. Please deny both these permits. Beyond the environment and wildlife, people are susceptible to the direct danger of exploding oil trains running along through these neighborhoods like mine, past homes, schools, shopping centers.

These uninsurable risks fall on us, the citizens, while profits go into corporations far away. Oil explosions and fires are preventible disasters only if you deny these permits.

Lastly we don't want to be polluted like Texas and Louisiana-type oil export terminals. We need to make the change to clean energy, with wind or solar. We need to move away from climate destroying oil and move to clean energy. Please deny these two permits. They're too dangerous.

Response GP354-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP355, **Inskeep, Terry**

Comment GP355-1

My comments relate to both the Westway and Imperium Draft EISs.

Bad, no make that terrible, idea to have a terminal in Washington State at all, but especially in Grays Harbor which would be at high risk for an oil spill. Grays Harbor sits in a major earthquake and tsunami zone. Not only would an oil spill have an impact on marine resource jobs which support more than 30% of Gray Harbors workforce. Do not destroy yet another beautiful place.

Response GP355-1

Comment acknowledged.

GP356, **Isaacson, Tom**

Comment GP356-1

if the railroad system passes the all the safety requirements & the piping & tank farms also pass the requirements...than oil by rail is okay.

Response GP356-1

Comment acknowledged.

GP357, **Jackson, Aria**

Comment GP357-1

I oppose oil-by-rail because of the danger it poses to the environment and public health. The potentially explosive Bakken crude-oil trains serviced by these terminals would travel through, and directly threaten, the Columbia River Gorge National Scenic Area, a place I hold dear and which is very near my home in Portland.

Response GP357-1

Comment acknowledged.

GP358, **Jacobson, Don**

Comment GP358-1

There is no safe way to transport the highly explosive Bakken crude-oil through the Columbia River Gorge. An accident would be catastrophic to the Gorge ecosystem. The oil trains must not travel through the Columbia River Gorge.

Response GP358-1

Comment acknowledged.

GP359, **Jaeger, Michael**

Comment GP359-1

Please be sure to consider and quantify the potential risks and costs of recovery/remuneration should a train accident occur between the oil source and these Grays Harbor destinations.

Response GP359-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP360, **Jamison, Robert**

Comment GP360-1

Leave the resources alone. Do not use the world's diminishing resources for a few people to profit. They have all the money that they could ever need and only want more. They care not one bit for the World they live in. Profit and power is all they want.

Response GP360-1

Comment acknowledged.

GP361, **Johnson, Ali**

Comment GP361-1

My name is Ali Johnson. I am from Olympia, Washington, and I strongly oppose Westway and Imperium terminal. Section 5.7 in Westway DEIS states the impact of oil spills cannot be fully mitigated and that potential significant adverse impacts on environmental and human health in case of an incident happening.

I believe those impacts are not valid enough in the DEIS and that there can be much more exploration to this. This could mean the loss of jobs and even life. And are these risks that these companies are willing to take?

A spill here on the coast would really devastate the fishing industry, commercial, tribal, recreational, and fisheries. And this is unfair for everyone. My father is a fourth generation fisherman in Westport. This is my family heritage with many other people that live in this county.

Because of these abundant and natural resources, my family can support itself. I can go to college, and I can further my education, and now I can give back to my state and my community. It's a chain reaction. One gives people chances and opportunities. I urge you to think of your children and grandchildren's future.

What quality of life do you want to leave them with? Do you want to leave them with water full of life and opportunity? Or leave them with water that is dead and contaminated. Because the impacts

cannot be fully mitigated. I urge you to deny these permits to Westway and Imperium in the name of our environment.

Thank you.

Response GP361-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion. Final EIS Seciton 4.7 has been revised to more fully describe potential impacts on fishing industries.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP362, **Johnson, Marjorie**

Comment GP362-1

Can you imagine what an oil spill (which is inevitable in time) will do to our dams that make our electricity for the Pacific Northwest!? This is just one of my concerns. Others are polluting the river in such a way it might be years before the fish could be used. The birds and other wildlife in the Gorge are crucial in keeping the Scenic Gorge intact for future generations.

Lots of people depend upon the river and it would be a huge economic risk and loss when an accident needless to say the noise, and time frames for the tains to pass through our small towns. The delays would cause stress on the residents and business establishments. Please do not proceed with this dangerous venture. It does not belong in our Oreon/Washington Scenic Gorge. Public Citizen from Hillsboro, Oregon

Response GP362-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

GP363, **Johnson, Mary K.**

Comment GP363-1

Name: Mary K. Johnson
Organization: Corona Communications
City/ State/ Zip: Olympia, WA 98502

From an area of research I was able to do in one hour about oil spills and emergency planning, I have learned that the planning involves preparing first responders by training them to deal with the toxic cargo being transported by rail.

But what about the cost of the on-going damage? Already an emergency has happened, what [illegible] to WA people [illegible] when an a spill or an explosion? How many Dr's, nurses, burn specialists, lab technicians, therapists, or oncologists would it take to treat & heal any victims? How much insurance coverage would they involve? There is so much more to turn, this is one piece. This permit must be denied.

Response GP363-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP364, **Johnston, Robert**

Comment GP364-1

Johnston & Oulman, Re. DEISs for Westway and Imperium Expansion Projects 11/29/15

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

From: Robert M. Johnston & Lynne Oulman
816 14th Street
Bellingham, WA 98225

Re: DEISs for Westway and Imperium Oil Terminal Proposals

Dear Washington Department of Ecology and City of Hoquiam:

The DEISs for Westway and Imperium oil terminal proposals must be substantially revised to fully disclose the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, vehicle delay at railroad crossings, and negative impacts on the Columbia River Gorge National Scenic Area. In reality, it is highly likely that the indirect and cumulative environmental impacts would be significant and impossible to mitigate.

Response GP364-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment GP364-2

The DEISs should be expanded to comprise a full and comprehensive environmental impact statement. They should also be evaluated in light of the Magnuson Amendment, which restricts shipment of crude oil along Washington's shores. This federal law was ignored by the US Army Corps of Engineers in the case of the BP North Wing Pier at Cherry Point, WA. We should not let this happen again.

Response GP364-2

The proposed action would not require federal permits; therefore, it is not subject to the Magnuson Amendment.

Comment GP364-3

The impact of increased rail and ship transport of crude oil through the State of Washington, must be considered in the context of the potential cumulative effect of the multiple, similar projects through out the region. Responsible decision-making requires putting all the evidence on the table, so as to be able to understand the consequences a single action may have when combined with other, similar actions under consideration. To decide on initiatives such as Westway and Imperium in isolation, separate from other, similar initiatives in the region, is just plain bad decision making.

Response GP364-3

Refer to the Master Response for Connected or Similar Actions.

Comment GP364-4

There are so many factors that point toward the potential for major, significant impacts from transporting dramatically increasing amounts of crude oil through the state by rail and ship. Even the most casual observer of national, regional and local news media can point to many of them. Railway tank cars in use today are obsolete and unsafe, especially when it comes to transporting Bakkan crude oil. The emergency response capability of both industry and public entities along rail routes is seriously below what it needs to be to assure public safety. This combined with an as-yet-undermined, but arguably dramatic, increase in rail transport of crude oil statewide, points toward significant increased risk of a major disaster.

Response GP364-4

Refer to Response to Comment GP364-1.

Comment GP364-5

A comprehensive evaluation of environmental impacts statewide should also be included. An increase in rail and marine vessel transport of crude oil will increase the risk of oil spills. Train routes follow along waterways, and oil tankers travel though already busy coastal waterways. Both the state's rivers and its marine areas are home to dozens of state and federally designated endangered and threatened species. Crude oil contains many substances known to be toxic to living organisms. Without calculating the risk of potential harm from oil spills due to increased rail and vessel traffic, both to humans and to other living creatures, no responsible decision can be made as to the environmental impact of proposals like these. And such decisions must be made in the context of the potential, comprehensive impact of all such projects in the foreseeable future.

In addition, the DEISs have failed to substantively address the concerns raised by many environmental groups and individuals, in particular the specific concerns related to the Columbia River Gorge National Scenic Area. This is inconsistent with the scenic area act, and it is illegal under the State Environmental Policy Act to ignore these impacts.

Some specific examples of this include:

- The DEISs fail to analyze the indirect project impacts to grade crossings in the Gorge, the extent that the increase in oil trains would impact the level of service for local traffic, and any necessary mitigation measures, such as new overpasses.

Response GP364-5

Refer to Response to Comment GP364-1.

Comment GP364-6

- The DEISs fail to analyze the cumulative impacts to grade crossings from the proposal and other oil and coal export proposals, the likely need to construct additional sidings, overpasses, and second tracks, and the need for additional emergency response capacity along the entire rail route.

Response GP364-6

Draft EIS Chapter 6, Section 6.5.5.2, *Cumulative Impacts*, describes cumulative vehicle delay impacts at grade crossings in the study area. Regarding rail capacity, as described in Section 6.5.4.2, *Cumulative Impacts*, the addition of approximately 4.25 cumulative rail trips per day between Centralia and the project site can be accommodated without capacity improvements to the existing rail line. Regarding emergency response, refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP364-7

- The DEISs fail to list the Columbia River Gorge National Scenic Area Act and Management Plan as an applicable regulation, despite the fact that the cumulative impact of additional oil train traffic would require new construction in the National Scenic Area.

Response GP364-7

The proposed action does not involve construction in the Columbia River Gorge National Scenic Area.

Comment GP364-8

- The DEISs fail to disclose the actual risk of an oil spill or explosive accident in the Gorge. The DEISs provided analysis of the risk of a spill or explosion near the facility where maximum speeds are limited to 25 mph. The DEISs completely fail to disclose the risk of spills and explosions in the Gorge, where the maximum speed is 50 mph for unit trains of oil and 60 mph for mixed-commodity trains with up to 34 oil tank cars dispersed throughout the entire train.
- The DEISs fail to analyze the likelihood of a spill in the Columbia River along hundreds of miles of the BNSF rail line.
- Along with failing to analyze the likelihood of a spill, the DEISs fail to analyze safety impacts to local communities, environmental impacts to threatened and endangered salmon species in the Columbia River, and operational impacts on Columbia River Dams.

An increase in rail and marine vessel transport of crude oil will unquestionably increase the risk of oil spills. Train routes follow along waterways, and oil tankers travel though already busy waterways along Washington's coast. Both the state's rivers and its marine areas are home to dozens of state and federally designated endangered and threatened species. Crude oil contains many substances known to be toxic to living organisms. Without calculating the risk of potential harm from oil spills due to increased rail and vessel traffic, both to humans and to other living creatures, no responsible decision can be made as to the environmental impact of proposals like these. And such a decision must be made in the context of the potential, comprehensive impact of all such projects in the foreseeable future.

There's a reason for the state and federal laws that lay out the process for responsible and comprehensive consideration of environmental impacts. Far too often folks have sought the shortest, quickest solution to the problems before them. If you're a corporation seeking to maximize your profits, it's much better if you can keep the focus narrow and avoid having to explain the consequences of your project in combination with other, similar projects in the area. If you're a

government entity, it's easier if you can avoid the additional work of a more comprehensive study. But there are times when the easiest, quickest path isn't the best way to go. Shortcuts and easy fixes are absolutely the wrong approach to the potentially huge increase in the transport and export of fossil fuels through our state. The health and safety of our citizens and the quality of our environment truly are in the balance. This is why we are urging you to do the following:

- Revise the DEISs so that they comprise a full, comprehensive environmental review of these projects and their direct, indirect and cumulative impacts on communities and waterways in Washington State. This EIS must review and assess the potential impacts statewide on rail traffic, health, public safety, and oil spill risks. These effects must be assessed in the context of all other proposals for transporting and refining petroleum in the state.

Response GP364-8

Refer to Response to Comment GP364-1.

Comment GP364-9

- The EIS must assess the risk of oil spills presented by new feedstocks arriving by rail, not just in the vicinity of the proposed facilities, but also on all routes and waterways along which the oil would be transported. Transporting Bakken crude oil and tar sands bitumen presents new risks that have neither been adequately assessed nor prepared for. Current spill response plans and facilities are simply not adequate to address these new risks. The EIS must honestly and thoroughly assess what must be done to protect citizens, our communities and our environment.

Response GP364-9

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

Comment GP364-10

- The EIS must engage in a robust analysis of potential impacts on all endangered and threatened species. It must assesses the potential risk, especially of oil spills and vessel traffic, to Chinook salmon, the southern resident orcas, and all other state and federal threatened and endangered species that may be affected. This assessment must take into account, among other things, the chemistry and the characteristics of polycyclic aromatic hydrocarbons (PAHs), which oil spills deliver into the environment. In marine environments, for example, PAHs can remain in sediments indefinitely and affect organisms at all trophic levels. Organisms that do not metabolize PAHs may bioaccumulate them and pass them along to their predators. Organisms that do metabolize them, larger marine species especially, suffer the effects of the carcinogenic by products of metabolizing PAHs.

Current levels of PAH accumulation in land and marine environments potentially affected by the Westside and Imperium projects must be determined, and the effects of the potential increases in this contamination that might be caused by the proposed rail facilities must be assessed.

Response GP364-10

Draft EIS Chapter 3, Section 3.5, *Animals*, focuses on rare, threatened, or endangered species (listed in Draft EIS Appendix F, *Special-Status Species*) and conservatively assumes that these species are or could be present in the study area at any given time. The Draft EIS refers to other species in general terms. Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, identifies potential impacts on plants and animals from oil spills from rail transport and vessel traffic. Refer to Response to Comment GP364-1 regarding the extended study area.

Comment GP364-11

- The EIS must also evaluate the proposed facilities in light of the Magnuson Amendment and all other federal laws that address transport of oil in, through, and from Washington State.

Response GP364-11

The proposed action would not require federal permits; therefore, it is not subject to the Magnuson Amendment.

Comment GP364-12

There is simply too much risk and too little reward from these proposals: Grays Harbor and railline communities would take on the risk and oil companies would reap the profits, while Grays Harbor and the Columbia River Gorge would become a through-way for oil going elsewhere. Much of what makes these regions special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, spectacular coastal waters, sensitive habitats and protected lands and waters in the Columbia River Gorge.

Response GP364-12

Refer to Response to Comment GP364-1.

Comment GP364-13

The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line from Aberdeen to Chehalis, through the Columbia River Gorge, and all the way to the source of the oil in North Dakota and elsewhere.

Response GP364-13

Refer to Response to Comment GP364-1 regarding the extended study area.

Comment GP364-14

There are better ways to meet our energy demands. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our electricity needs and respond to global warming. Building more, large infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor. Washington State should continue to lead on safe, renewable, clean energy solutions and say no to more oil and coal.

We believe that the cumulative environmental impacts of the proposed oil facilities in Gray's Harbor and elsewhere in our state will be too great to mitigate. We urge you to protect Grays Harbor, the Columbia River Gorge, and our communities by getting all the relevant information on the table and in the light of day. We believe this will show that the only reasonable course will be to reject the proposed Westway and Imperium oil terminals.

Sincerely,

Robert M. Johnston
Lynne Oulman

Response GP364-14

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP365, **Jordan, Janet**

Comment GP365-1

Exploding oil trains are a problem that can't be solved by better equipment or better laws. Starting last April, laws went into effect telling oil companies in North Dakota they had to remove volatile gases from the oil tankers before they shipped them out. But even after the new regulations went into effect there was a large explosion in Heimdal North Dakota, involving six cars. Other new regulations included heavier shells and stronger valves for oil tankers. These will have to be phased in over time, since there isn't enough industrial capacity to replace them all immediately. Oil and train representatives are both protesting the new regulations, saying they are too expensive. So it isn't for certain that the new regulations will be phased in at all; they could be weakened by the continual lobbying. And critics say that no amount of jacketing for oil tankers will totally protect them from catching fire if they derail.

Response GP365-1

Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and the retrofitting of all existing tank cars in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643). However, as noted in Section 4.5.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport*? the risks cannot be eliminated.

GP366, **Jordan, Janet**

Comment GP366-1

Congress is considering an end to the ban on the export of crude oil. Ending the ban would bring about a boom in oil production (low prices are limiting production right now) and ensure that oil trains run ceaselessly through Washington. Any comments on inconvenience to cities along the way should be doubled or tripled with this increase in mind. Thank you for the chance to comment.

Response GP366-1

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

GP367, **Jordan, Janet**

Comment GP367-1

We desperately need to deny both these permits. Oil trains across the state would turn huge swaths of Washington State into a sacrifice zone. The state would not benefit, only the oil companies. The oil trains are dangerous; DOT-111 cars would be used for the foreseeable future and they allow flammable vapors to collect. They also are vulnerable to punctures, at which point the vapors ignite. Oil itself ignites, fast enough to produce a "bomb" effect. Towns across the state are unprepared for the danger and preparing would place a heavy burden on them.

Response GP367-1

Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and the retrofitting of all existing tank cars in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643). However, as noted in Section 4.5.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport*? the risks cannot be eliminated.

Comment GP367-2

The oil trains would slow down traffic in the cities and towns they cross and again, creating overpasses would place a heavy burden on them. Quality of life would be degraded even with overpasses.

Response GP367-2

Comment acknowledged.

Comment GP367-3

And even all this is not the worst. The worst is that the oil that would be burned every year, added to what we are already burning, contributes to climate change when we should be working with all deliberate speed to transition to clean energy. We can't afford the economic burdens of rebuilding cities after floods/hurricanes, finding a new area to create farms when our existing farms go belly up in the new rain-free climate, and finding new firewood after all our forests are lost to forest fires. Instead of working on these problems, we should decrease our use of oil and move to a better source of energy. Thanks for accepting my comments.

Response GP367-3

Comment acknowledged.

GP368, **Jordan, Yvonne**

Comment GP368-1

I have lived at one end of the gorge or the other for a lifetime. A few years ago as I was coming back from The Dalles I was approaching Portland and saw a train with hot wheels and a lot of smoke coming off of them. I exited the freeway, called 911 and tried to report it on a Sunday afternoon. I finally got the emergency person to give me the phone for UP's police and I made contact with them telling them that the train headed to the gorge. The train was stopped, corrections made and continued on. I was called back and told that it would have been a derailment. The thought of what could have happened still bothers me.

The thought of what is being proposed for transport is incomprehensible to the future of The Columbia river and the health and well being of Oregon and Washington. Yours for a healthy world Yvonne Jordan

Response GP368-1

Comment acknowledged.

GP369, **Julius, Theressa**

Comment GP369-1

My home is within a half mile of the rail line. With increased rail traffic and an increase in combustable materials being transported, my residential property value will go down. This will be a financial burden to me in the short term and long term. I assume loss of property value will be compensated as part of the project mitigation. Who will reimburse me for the loss of value on my property? Will I be receiving a check refund annually or quarterly?

Response GP369-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section

7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP370, **Justis, Bill**

Comment GP370-1

Comments on the Westway and lmperium Expansion Projects

Bill Justis 6345 Cedar Flats Road SW Olympia WA 98512-9410

Dear Ladies and Gentlemen

Thank You for the opportunity to comment on this significant proposal. I am a retired Forester with 11yrs with the WA State Department of Natural Resources and 19 years with the WA State Department of Revenue. I retired in 2002 as a Revenue Forester 4. I was born in Puyallup in 1946 have lived in Western Washington my entire life excepting 2 1/2 years while attaining a BA in Forest Management at WSU in Pullman.

I am interested in this proposal because I have roots in Grays Harbor County. My Mother was raised in Elma. I have a long history of Razor clam digging starting when I was about 5 yrs old and continues to this day. My Uncles dug clams for food and money when they were in High School. The clam season was the focal point of many family gatherings at the beach mostly at Ouyhut before Ocean Shores was thought of. I have numerous relatives in the Chehalis Valley area and this proposal concerns me a great deal.

My comments are based on the DOE/City of Hoquiam fact sheets, my familiarity with the region and my natural resources background. They are not listed in priority order but I hope you consider them all seriously.

Rail Transport Impacts

The fact that the Federal government restricts oil trains to 25 mph says to me that the PS&P line is in poor repair. Doubling the number of trains is likely to expose failures.

Traveling at slow speeds is unlikely to reduce ignition of spilled oil in case of crash. Bakken crude oil is noted for being very volatile. These trains with 3.6 million gallons of volatile oil will travel right through several towns a couple times a day. A collision or derailment with a spill and fire would be a major catastrophe destroying life and property.

Response GP370-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures that would reduce the likelihood of a spill

reaching the environment and the potential impacts of an incident. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP370-2

There are many places along the PS&P that are not accessible by road. The foam firefighting truck stationed in Elma may be useless for fighting an oil fire in these locations.

Response GP370-2

Refer to the Master Response for Emergency Response and Planning Gaps for information about the analysis of emergency planning and response capabilities.

Comment GP370-3

The increased train volumes will approximately double the particulate pollution from diesel exhaust in the air on the land and in the water. Grazing livestock (dairy cattle) will be breathing the particulate and eating pollution settling on the fields. oil spills from accidents will very likely enter streams or rivers. The PS&P fine follows the Chehalis River and crosses many side streams along the route. The main line tracks also follow the Columbia, Cowlitz and Newaukum rivers.

Response GP370-3

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter from rail transport related to the proposed action and cumulative projects, respectively. The highest concentrations would be along the line between the project sites and Poynor Yard related to rail switching operations. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant. Concentrations along the remainder of the line would be substantially lower.

Comment GP370-4

Increased rail traffic will disrupt vehicle traffic in Rochester, Elma, Montesano, and particularly in Aberdeen. The Olympic Gateway Plaza will become a major bottleneck disrupting commerce in the area a great deal. This is a major deal breaker especially during razor clam season when thousands of cars travel to and from the beaches. The EIS estimates the wait time at Olympic Gateway Plaza to be between 3 1 /3 and 4 1 /4 hours per day. Fire and medical emergency vehicles will be blocked. This is totally unacceptable.

Response GP370-4

Final EIS Chapter 3, Section 3.16.8, *Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?* clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Comment GP370-5

The doubling of rail traffic will generate a great deal more noise. Trains are noisy especially the sounding of warning horns while approaching road crossing. The additional noise will be very disruptive for the communities along PS&P's line.

Response GP370-5

Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*, provides a detailed analysis of noise and vibration related to the proposed action that would occur in the study area.

Comment GP370-6

Vessel Traffic Impacts
The EIS estimates the vessel traffic to increase to 1074 vessels per year. This computes to over three per day assuming that it is a perfect year and ships can come and go every day.

What happens during bad weather? Where are these vessels going to go? There is no space in Grays Harbor to tend more that a few vessels. Vessels waiting to unload will add to congestion and increase the likelihood of collisions or groundings. I have not read the full EIS (chap 4) but increased traffic will increase the likelihood of accidents.

Crossing the bar and navigating the narrow channel in Grays Harbor is tricky at best. During high river water events which are common in the winter months greatly increases the currents in this narrow channel. The increase in traffic will greatly increase the likelihood of collisions and groundings.

Response GP370-6

The proposed action would result in 0.7 additional vessel transit per day on average. State-licensed pilots work with the vessel operators to schedule vessel transits and to prevent any bottlenecks. Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*, discusses the systems that are in place to manage vessel traffic within the port of Grays Harbor safely. Chapter 4, Section 4.6, *Environmental Health Risks—Vessel Transport*, presents an analysis of potential impacts from increased risk of vessel collisions, groundings, and allisions and related consequences (e.g., release of crude oil) under the proposed action, and proposes mitigation measures to reduce the likelihood of a vessel incident.

Comment GP370-7

The vessels that come to port empty to load from these transfer tanks will be carrying ballast. I think that most of these vessels take on ballast water from their last port of call. The amount of ballast water from foreign seas will likely increase greatly and the likelihood of introducing invasive species also increases. The EIS says that the companies will do their own monitoring. This is the fox guarding the henhouse.

Response GP370-7

Draft EIS Chapter 3, Section 3.3, *Water*, Section 3.4, *Plants*, and Section 3.5, *Animals*, describe potential ballast water impacts and the regulatory requirements to reduce these impacts. Section 3.4.7.1, *Applicant Mitigation*, and Section 3.5.7.1, *Applicant Mitigation*, identify mitigation measures to further reduce potential impacts.

Comment GP370-8

Increased Air Pollution Impacts

The EIS states that during the transferring of oil that Federal and State air pollution standards will likely be met. Westway and lmperium will do their own monitoring and notify authorities if standards are exceeded. Self monitoring is highly subject to falsifying and neglect. This rarely works satisfactorily. Even if done properly the air in the proximity of Hoquiam will get much more polluted. The sea breeze will be laden with petrochemical fumes and carbon dioxide. The greenhouse gases are estimated to be equivalent to the emissions of 20,400 cars! Hoquiam had better hope that the wind keeps blowing.

Response GP370-8

As described in Draft EIS Chapter 3, Section 3.2, *Air*, the proposed action is subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record-keeping requirements for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and proposed applicant mitigation that would reduce potential impacts on air quality.

Comment GP370-9

Increased Water Pollution Impacts

By far the most serious risk ls pollution of our water and shores with Bakken crude oil. Precautions will be taken and oil will be spilled. The chances of oil spilling into the water during transfer to vessels is likely. The ongoing process of transferring oil to vessels will accumulate oil in the harbor and water quality will diminish.

The corner stone of the Grays Harbor county economy is recreation, fishing and shell fish harvesting. A significant spill will have severe impacts on these resources. Oil spilled in the Grays Harbor estuary will be next to impossible to clean up. The vast majority of the area is mudflats with shallow water even at high tide. Cleanup up of nonfloating oil on the mud would be nearly impossible. Oil could also be pushed up numerous rivers that enter Grays Harbor. An oil spill on the coast would severely impact Razor clams and the Dungeness crab fishery. The States largest oyster industry in

Willapa Bay is nearby. A large spill may be unlikely but the potential losses could be very severe and the risk is not worth the gamble.

During vessel loading an oil boom is to be deployed. The EIS fact sheet states that the "transfer boom will be used unless it is not safe or effective". During much of the winter a stiff wind blows up the river making the water quite choppy. Oil booms are not effective in rough water. That means spilled oil during loading of vessels (small spills are deemed likely) during windy weather will not be boomed.

Response GP370-9

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. This includes measures to collect additional data to inform conditions for safe and effective prebooming, determine the number of days it is safe and effective to preboom and identify site-specific improvements, and implement alternatives to prebooming when it is either not safe or until other measures are in place. However, as noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP370-10

Employment

The fact sheets state an estimated 139 permanent jobs. The construction phase will likely employ most of the labor from out of the area and will be temporary creating a brief boom to the area and then a contraction. The oil transfer jobs may also prove to be temporary as renewables and market forces make Bakken crude too costly. For these jobs we risk environmental damage that will diminish a reliable source of income from harvesting food. Food that replenishes and grows itself for as long as we manage the resources prudently. Handling oil will damage these resources incrementally and jobs in this sector will be lost.

Recreation revenues could be reduced because of the significant traffic delays in the Olympic Gateway Plaza area. People headed to the beach for recreation will find other places to go to avoid the long delays and traffic snarls.

Response GP370-10

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP370-11

Catastrophic Events

The timing of earthquakes is hard to predict. One thing we know is they are likely to happen and based on historic events we could have the "big one" any time. A tsunami event would certainly inundate both of these tank farms if the quake does not destroy them first. Most of the harbor property sits of fill and is saturated with water. Even a moderate quake most likely will turn the site to liquefaction. A flood event coupled with a high tide could flood this site. We cannot mitigate these risks.

Response GP370-11

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP370-12

Conclusion

To put it bluntly, I see very little benefit to the region from these two projects and many negatives. The damage to the environment and property from significant spills is real and they will occur. Train derailments happen regularly. Traffic movement through Aberdeen will be severely impacted. The Imperium project has some validity by producing some refined products that could meet domestic needs. It seems Westway is merely an oil handling facility to transport oil to the highest bidder. I cannot support Bakken crude oil from North Dakota because of the huge environmental costs of extraction, the waste it leaves behind and large volumes of pollution to our atmosphere. The most powerful hurricane ever recorded in the northern hemisphere has just occurred off Mexico. Climate change is happening now and this project will only hurry it along. It is the wrong thing to do for the country and the world economy. The people of the Grays Harbor region are taking huge risks to their livelihood and to their way of life for the benefit of others. I appeal to your good conscious to do the right thing and refuse to permit these two projects.

Response GP370-12

Comment acknowledged.

GP371, **Kachman, Kati**

Comment GP371-1

Hi, my name is Kati Kachman. And the reason I came back is that -- this is my son. Okay. His name is Hudson, and he's seven months old. He will turn seven months old today at the stroke of midnight. And I'm here today speaking for Hudson as a very young -- one of the youngest residents of Aberdeen.

He doesn't get to speak his voice today about his thoughts. He also does not get to talk about the impacts, but he's going to be someone that will be impacted by this for probably 80 years. And I want to talk about risks versus rewards of this project.

First of all, the reward -- I wasn't able to come up with many of them. There's going to be some money for Westway, money for Imperium. Jobs for Aberdeen -- not very many jobs and possibly

some economic benefit, and not a whole lot we don't really know if it's going to be Aberdeen versus other areas outside of Aberdeen.

Then we talk about risks. We have lots of risks to plant life, plant life, marine life, human life, housing, and businesses are at risk, property values. Our disaster response and clean up, we don't have a great plan for that right now.

Tribal resources, recreation, tourism, water, jobs, health risks, farming, food. And, again, I say our children's future. So I ask you to please deny these permits. We owe this to Hudson and other thousands of children in Grays Harbor and Quinault.

Response GP371-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP372, **Kaiyala, Julie**

Comment GP372-1

My name is Julie Kaiyala. I live just two blocks away from the tracks and there's been more than one where the trains have tipped over right there. They just recently -- I don't remember how long ago it was, within the year, there was a bunch of trains that fell over. Those tracks are rotten.

So if they're thinking they're going to run these oil trains along there, I thought they must have rocks in their head to be thinking they're going to do that without making sure the tracks are completely safe.

And just living in my community, my concern is with the birds and environment here. Not only the people, but we live in a house that my dad built not two blocks away from it.

So I guess that's all I have to say, but I think that man is a being quite rude to the people that are speaking out there too. I don't know why.

Thank you.

Response GP372-1

Comment acknowledged.

GP373, **Kaplan, Robert B.**

Comment GP373-1

The Department of Ecology and the City of Hoquiam know that the risks from these proposals are too high. If Grays Harbor becomes a hub for crude oil, all of Washington will be threatened.

Response GP373-1

Comment acknowledged.

GP374, **Keefe, George**

Comment GP374-1

A comprehensive draft environmental impact statement must include track failure, a growing safety problem. A review by the Los Angeles Times published October 5, 2015, shows track failure problems were blamed for 55% of oil train derailments since 2013, double the rate for all types of freight train accidents. Oil trains 100 cars in length weigh 19,000 tons, which is almost 40 million pounds. Further, oil sloshing in the cars may be exacerbating the problem and causing higher than expected track failures according to rail safety experts. Investigators at Safety Transportation Board Canada suspect that oil trains cause unusual track damage. The Safety Director at the Brotherhood of Maintenance of Way Employees said that oil trains may be creating unique stresses on the tracks. "You can certainly get some rhythmic forces in …oil trains that you might not see on a mixed freight train with cars of different sizes, weights, and commodities." Even if tracks conform to Federal standards, they can separate under the force of a heavy train. Critics say that many of the safety initiatives adopted so far reflect a policy at mitigating the damage caused by derailments rather than preventing them. Brigham McCown, former chief of the Federal Pipeline and Hazardous Materials Safety Administration said, "I believe the Department of Transportation has myopically focused on incident mitigation. Prevention should be the first question they should address." Sarah Feinberg, chief of the Federal Railroad Administration said: "We have been incredibly lucky that the accidents have happened mostly in rural areas." I implore you to prevent environmental catastrophes and human tragedies throughout our state.

Response GP374-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

GP375, **Keefe, George**

Comment GP375-1

My comments relate to both the Westway and Imperium Draft EISs.

Please conduct comprehensive review 1. Impact on turning local seafood industry 2. Effect of combustion of such fossil fuels upon ocean acidification and climate disruption 3. Certainty of disastrous consequences of rail car explosions.

Response GP375-1

The commenter does not provide sufficient detail on missing information to allow for a response.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*. Refer to Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, and Master Response for Environmental Health and Safety Analysis.

GP376, **Kempfer, Wes**

Comment GP376-1

Projects like these benefit almost no one except for those blinded enough by greed that they would doom all of humanity to who knows what kind of hellish future for their own short term gain. It is now a certainty that in the coming years millions of people will be driven from their homes as the climate shifts and sea level rises. In light of that, it amazes me that these projects are even seriously considered. I admit that I have not read the DEIS for either project. It is my opinion that in light of what we know about climate change that expansion of fossil facilities should be summarily dismissed. It is unlikely that national governments will come to an effective agreement about climate change. We cannot wait for them. It is at the local and regional level where measures to reduce greenhouse gas emissions must happen in any event. It is my hope that the state and local leaders making the decisions around these projects will recognize the tremendous responsibility that is on their shoulders, especially considering the abysmal failure in leadership at the federal level. The fate of humanity may indeed lie in the decisions like this made by city governments around the world. Please support the no build alternative. Sincerely, Wes Kempfer

Response GP376-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP377, **Kenney, Pat**

Comment GP377-1

My comments relate to both the Westway and Imperium Draft EISs.

Grays Harbor's narrow, shallow shipping channel and strong currents make it an unsuitable location for an oil terminal. For the DEIS please strongly consider the WA Dept of Fish and Wildlife's study showing "Grays Harbor is an area particularly sensitive to the adverse effects of oil spills."

A major oil spill would adversely effect, marine industries, & tourism. That would impact other businesses as well.

Response GP377-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that

would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on Grays Harbor. Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Comment GP377-2

Tribal rights to fishing must be respected!

Response GP377-2

Comment acknowledged.

Comment GP377-3

Gras Harbor [sic] is also in a major earthquake & tsunami zone. These catastrophes add to the risk of further oil spills from containers on land as well on the water.

Response GP377-3

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

GP378, **Kersting, John**

Comment GP378-1

Dear Department of Ecology and Associated Staff,

As a Parent, Journalist, Teacher and Community Leader as President of the Olympia Fraternal Organization of Eagles with over 450 members, I have been working on environmental issues for over 40 years. I remember back when our rivers were burning, Great Lakes dead and I am dead tired of corporate bullying in the name of profits for those who deserve none for poisoning our seas, air, food and lands. It is disturbingly hypocritical of our Department of Ecology, industry representatives and politicians to have access to 40 years of foundational peer-reviewed documented evidence of harm and danger with our energy sources particularly oil and coal yet to give industry a pass on the true economic, environmental and health costs of these reckless methods of energy production. These industries must be held fully accountable for their devastating impact and make room for true progress in low impact energy sources. Our government agencies must follow their foundational mandates and take the strongest actions possible to protect our planet, children and your own self.

Response GP378-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP378-2

For over 30 years I have been watching a slow train wreck in our environment, land air and water, where the use of fossil fuels has overwhelmed the incredible animal, plant, fragile environment and native peoples interests with flat out greed.

The Exxon Valdez cleanup is incomplete, funds locked in lawsuits and all efforts have been inadequate and ineffective. The Deepwater Horizon has devastated that area and will for decades. The oil train fires and spills are legion and an unacceptable risk to the incredible wealth of the Pacific Northwests treasured fisheries, landforms and water. Our government and corporations are a failure in showing responsibility with much more damage, oil spills and garbage strewn across many fragile landscapes.

OUR region is valuable beyond measure, fragile beyond belief and threatened with generations long catastrophe for a product that should have been phased out long ago and threatens our survival ironically illustrated by the diminishing arctic ice and desertification of wide swathes of our planet including California. I am appalled as are a clear majority of Americans who seem to be regularly ignored by our representatives.

Response GP378-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP378-3

You have failed to account for the climate change impacts of the 4.3 billion barrels of oil being sent to a Communist Country with no environmental safeguards which also takes away American jobs. Saying the contribution to climate change would be “negligible” is disingenuous. Last fall, over 400,000 people marched in New York City to call for urgent action on our climate. You cannot ignore the impact that the burning of oil will have on the global climate and the rapidly melting Arctic from which it will be extracted.

I am extremely concerned about the changing dynamics of oil transportation and the potential for more oil traveling through our region. I urge the state to use this study to inform strong public

policy actions that will ensure the safety of our communities and address the risks to our waterways now and in the future.

John Kersting

Response GP378-3

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, describes the projected impacts of climate change in the Pacific Northwest. Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport from likely source to furthest likely destination, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

GP379, **Kersting, John**

Comment GP379-1

Dear Department of Ecology, City of Hoquium and Associated Staff, As a Parent, Journalist, Teacher and Community Leader as President of the Olympia Fraternal Organization of Eagles with over 450 members, I have been working on environmental issues for over 40 years. I remember back when our rivers were burning, Great Lakes dead and I am dead tired of corporate bullying in the name of profits for those who deserve none for poisoning our seas, air, food and lands.

It is disturbingly hypocritical of our Department of Ecology, industry representatives and politicians to have access to 40 years of foundational peer-reviewed documented evidence of harm and danger with our energy sources particularly oil and coal yet to give industry a pass on the true economic, environmental and health costs of these reckless methods of energy production. These industries must be held fully accountable for their devastating impact and make room for true progress in low impact energy sources. Our government agencies must follow their foundational mandates and take the strongest actions possible to protect our planet, children and your own self. I have been watching heartbroken as a slow train wreck continues in our environment, land air and water, where the use of fossil fuels has overwhelmed the incredible animal, plant, fragile environment and native peoples interests with flat out greed.

Response GP379-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP379-2

The Exxon Valdez cleanup is incomplete, funds locked in lawsuits and all efforts have been inadequate and ineffective. The Deepwater Horizon has devastated that area and will for decades. The oil train fires and spills are legion and an unacceptable risk to the incredible wealth of the

Pacific Northwest's treasured fisheries, landforms and water. Our government and corporations are a failure in showing responsibility with much more damage, oil spills and garbage strewn across many fragile landscapes.

Response GP379-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP379-3

OUR region is valuable beyond measure, fragile beyond belief and threatened with generations long catastrophe for a product that should have been phased out long ago and threatens our survival ironically illustrated by the diminishing arctic ice and desertification of wide swathes of our planet including California. I am appalled as are a clear majority of Americans who seem to be regularly ignored by our representatives. You have failed to account for the climate change impacts of the 4.3 billion barrels of oil being sent to a Communist Country with no environmental safeguards which also takes away American jobs. Saying the contribution to climate change would be "negligible" is disingenuous. Last fall, over 400,000 people marched in New York City to call for urgent action on our climate. You cannot ignore the impact that the burning of oil will have on the global climate and the rapidly melting Arctic from which it will be extracted. I am extremely concerned about the changing dynamics of oil transportation and the potential for more oil traveling through our region. Everyone I know with any knowledge of this opposes these trains and want Ecology and the City of Hoquium to take strong public policy actions that will ensure the long term safety of our communities and address the risks to our waterways now and in the future. John Kersting

Response GP379-3

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, describes the projected impacts of climate change in the Pacific Northwest. Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport from likely source to furthest likely destination, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

GP380, **Kipnis, Hinda**

Comment GP380-1

RE: Grays Harbor Oil Terminal Expansion Any expansion action which furthers world dependency on fossil fuels brings us closer to the tipping point for environmental catastrophe. Unfortunately, time is running out for our children and grandchildren! Because, global warming is an EXPONENTIAL happening. An elderly concerned citizen, Hinde Kipnis

Response GP380-1

Comment acknowledged.

GP381, **Kircher, Marjorie**

Comment GP381-1

Please consider the health and safety of our children (who represent the next generations) and reject these proposals, because I don't think the damaging effects of these projects to children can be mitigated. Please see the file I am attaching, with medical journal references supporting my concerns. Thank you. Marjorie Kircher, MS OTR

Regarding the Proposed Imperium and Westway Oil Terminal Expansion Projects at the Port of Gray's Harbor

Public hearing October 8, 2015, Aberdeen, Washington (Washington State Department of Ecology, City of Hoquiam)

I am Marjorie Kircher. Thank you for this opportunity to comment on the Imperium and Westway crude oil terminals proposed for Gray's Harbor.

There are many serious health and safety concerns around this project, and you will hear those in detail from many concerned citizens today. I have a particular health concern, from greatly increasing diesel pollution throughout the region, and I urge you to reject these proposals, because I don't think the damaging effects of these projects can be mitigated.

I worked as a pediatric occupational therapist in special education in Vancouver, WA for over 25 years. We in public education have witnessed a profound increase in the number and severity of children (per capita) with neurodevelopmental disorders such as autism, attention deficit hyperactivity disorder (ADHD), learning disabilities, mood dysregulation, and cognitive delay. The Centers for Disease Control and Prevention (CDC) corroborates this increase in their recent counts of pediatric disorders on their website.

This is likely due in part to increased exposures to neurotoxic chemicals in the environment. Scientific studies published recently have correlated prenatal and early life exposure to diesel particulate exhaust with autism, ADHD, lowered IQ and cognitive function, and increased behavioral symptoms of anxiety, depression, and aggressive behavior. Diesel components can cause permanent damage to the developing nervous systems of embryonic and young children, even at low levels. If this terminal is built, an enormous increase in our regional population's exposure to neurotoxins (double in this county alone), supplied by diesel particulates from a lot more oil trains passing, will

predictably increase neurodevelopmental impairments in our children even further. (DEIS states, "Increased rail traffic would almost double emissions of criteria pollutants associated with rail transport in county.") Also, handling oil at the terminal alone would give off many other toxic air pollutants, such as cadmium, benzene, formaldehyde, and toluene. This will be at large cost to our society. It creates jobs for special education professionals and ultimately, for long term care facilities.

(I am attaching to my testimony a list of these articles--because I am interested and concerned about this matter of air pollution, I recently did a library search at Oregon Health Sciences University, where I found these articles that concern public health—besides those I've just mentioned, also asthma (one in ten children now have asthma, also linked in studies to diesel exhaust); and in adults, lung and breast cancer, heart problems, strokes, respiratory illnesses and more.

Key American medical societies and the world health organization have issued positions on reducing air pollution for the health of the population: American Heart Association, American College of Obstetricians and Gynecologists, American Academy of Pediatrics, World Health Organization's International Agency for Research on Cancer, and others.

Please consider the health and safety of our children who represent the next generations, and reject the proposals by Imperium and Westway!

Thank you,

Marjorie Kircher, MS OTR

Occupational Therapist, Registered

SPECIFIC DISEASES ASSOCIATED WITH EXPOSURE TO HIGHER LEVELS OF PARTICULATE MATTER IN AIR POLLUTION

Cancer—Studies relating cancer risk and particulate matter:

- exposure to ozone and PM correlated with development of and mortality from lung cancer (Beeson, Dockery, Pope)

- increased biological markers associated with risk of lung cancer (Demetriou)

- increased oxidative DNA damage predictive of cancer risk (Avogbe)

- increased rates of breast cancer (Crouse, Wei)

Cardiovascular—Studies have linked increased particulate matter with increased cardiac disease:

- increased cardiovascular disease mortality and morbidity in both short term and long term exposures to PM 2.5 (Brook)

- increased hospital admissions for serious cardiac arrhythmias (Peters 2000)

- increased probability of admission for acute myocardial infarction (Mustafic, Peters 2001)

- increased ischemic heart disease, arrhythmias, congestive heart failure (Dominici) and bio markers (HRV) associated with increased cardiac morbidity and mortality (Pieters)

- increased hospital admissions and death from heart failure (Shaw)

- increased risk of congenital cardiac anomalies in children (Vrijheid)

Cerebrovascular - Studies have shown links between particulate matter and adult brain effects:

- increased hospital admissions for strokes (Dominici, Lue, Wellenius 2005)

- significant increase in stroke mortality associated with increase in PM (Chen, Qian)

- increased risk of stroke associated with increased exposure to small PM, black carbon, and nitrous dioxide (Wellenius 2012)

- increased risk of stroke and death from stroke for post menopausal women (Miller)

- structural brain damage and cognitive deficits in middle-aged and older adults (Wilker)

Neurodevelopmental—Studies associating in-utero exposure to particulate matter and:

- increased incidence of autism spectrum disorder (ASD)—(Becerra, Kalkbrenner, Raz, Roberts, Volk 2013, Volk 2011)

- increased incidence of behaviors associated with attention deficit hyperactivity disorder (ADHD) (Chiu, Newman, Perera 2014, Peterson)

lowered IQ (Calderón-Garcidueñas, Perera 2009, Jedrychowski)

- increased behavioral symptoms of anxiety, depression, social problems, rule breaking, and aggression (Perera 2013)

- neurobehavioral development in children benefited from the shutdown of a coal-burning plant (Perera 2008, Tang)

Pulmonary—Studies have demonstrated the effects of particulate matter on the lungs:

- decreased lung function (WHO 3)

- inhibited lung development in children and adolescents and measurable airway inflammation (Gauderman)

- increased asthma rates and worsening of preexisting asthma and chronic obstructive pulmonary disease (COPD), resulting in increased hospitalization (Carlsten et al., Gowers, Delamater, 2012; HEI Panel, Pandya, Trasande)

General—

- increased mortality from cardiac, respiratory and kidney disease in all members of communities with coal exposure (15,16,17,18 Hendryx 2007, Hendryx 2010, Hendryx 2008, Hendryx 2009)

- long term exposure linked to decreased life expectancy from cardiopulmonary mortality (Krishnan, WHO 4)

- prenatal exposures linked to altered immune system development (Hertz-Picciotto)

References:

(Includes all illnesses associated with airborne particulate matter in air pollution)

ACOG—The American College of Obstetricians and Gynecologists, Committee Opinion, No. 575, October 2013 –

http://www.acog.org/About_ACOG/News_Room/News_Releases/2013/Environmental_Chemicals_Harm_Reproductive_Health

AAP—American Academy of Pediatrics. Committee on Environmental Health. Ambient Air Pollution: Health Hazards to Children, , Pediatrics, 2004: 114, 1699-1707, Reaffirmed April 2009

(http://pediatrics.aappublications.org/content/125/2/e444.extract)

Avogbe P, Ayi-Fanou L, Autrup H, et al. Ultrafine particulate matter and high-level benzene urban air pollution in relation to oxidative DNA damage. Carcinogenesis 2004; 26(3):613-620

Becerra TA, Wilhelm M, Olsen J, et al. Ambient air pollution and autism in Los Angeles County, California. Environ Health Perspect 2013; 121(3);380-386

Beeson WL, Abbey DE, Knutsen SF. Long-term concentrations of ambient air pollutants and incident lung cancer in California adults: results from the Adventist Health Study on Smog. Environ Health Perspect 1998; 106(12):813-23

Bellavia A, Urch B, Speck M, et al. DNA Hypomethylation, ambient particulate matter, and increased blood pressure: findings from controlled human exposure experiments. J Am Heart Assoc. 2013; 2:e000212 doi: 10.1161/ JAHA 113.000212

Brook RD, Rajagopalan S, Pope CA, III, et al. Particulate matter air pollution and cardiovascular disease: An update to the scientific statement from the American Heart Association. Circulation 2010;121(21):2331-2378

Calderón-Garcidueñas L, Engle R, Mora-Tiscareño A, et al. Exposure to severe urban air pollution influences cognitive outcomes, brain volume and systematic inflammation in clinically healthy children. Brain and Cognition 2011; 77(3):345-355

Carlsten C, Dybuncio A, Becker A, et al. Traffic-related air pollution and incident asthma in a high-risk birth cohort. Occup Environ Med 2011; 68:291-295

Chen R, Zhang Y, Yang C, et al. Acute effect of ambient air pollution and health effects study. Stroke 2013; 44:954-960

Chiu Y-HM, Bellinger D, Coull BA, et al. Associations between traffic-related black carbon exposure and attention in a prospective birth cohort of urban children. Environ Health Perpect 2013; 121(7):859-864

Crouse D, Goldberg M, Ross N, et al. Postmenopausal breast cancer is associated with exposure to traffic -related air pollution in Montreal, Canada: a case-controlled study. Environmental Health Perspectives 2010; 118(11): 1578-1583

Delamater P, Finley A, Banerjee S. An analysis of asthma hospitalizations, air pollution, and weather conditions in Los Angeles County, California. Science of the Total Environment 2012; 425:110-118

Demetriou C, Raaschou-Nielsen O, Loft S, et al. Biomarkers of ambient air pollution and lung cancer: a systematic review. Occup Environ Med 2012; 69:619-627

Dockery DW, Pope CA, III, Xu X, et al. An association between air pollution and mortality in six US cities. N Engl J Med 1993; 329(24):1753-1759

Dominici F, Peng RD, Bell ML et al. Fine Particulate air pollution and hospital admission for cardiovascular and respiratory diseases. JAMA 2006; 295(10):1127-1134

EPA 1—http://www.epa.gov/region1/eco/airtox/diesel.html

EPA 2— http://www.epa.gov/teach/chem_summ/BENZ_summary.pdf

Gauderman WJ, Avol E, Gilliland F, et al. The effect of air pollution on lung development from 10 to 18 years of age. N Engl J Med 2004;351(11):1057-1067

Gowers A, Cullinan P, Ayres J, et al. Does outdoor air pollution induce new cases of asthma? Biological plausibility and evidence; a review. Respirology 2012; 17:887-898

Guardian: http://www.theguardian.com/environment/chinas-choice/2013/oct/24/china-airpocalypse-harbin-air-pollution-cancer

HEI Panel on Health effects of traffic related air pollution, Traffic related Air Pollution A Critical review of the literature on emissions, exposure, and health effects. Boston: Health Effects Institute; 2010.

Hendryx M, Ahern MM, Nurkiewicz TR. Hospitalization patterns associated with Appalachian coal mining. Journal of Toxicology and Environmental Health, Part A. 2007;70(24):2064-2070

Hendryx M, Fedorko E, Anesetti-Rothermel A. A geographical information system-based analysis of cancer mortality and population exposure to coal mining activities in West Virginia, United States of America. Geospatial Health 2010;4(2):243-256

Hendryx M, Ahern MM. Relations between health indicators and residential proximity to coal mining in West Virginia. American Journal of Public Health 2008;98(4):669-671

Hendryx M. Mortality from heart, respiratory, and kidney disease in coal mining areas of Appalachia. International Archives of Occupational and Environmental Health. 2009;82(2):243-249

Hertz-Picciotto I, Park H-Y, Dostal M, et al. Prenatal exposures to persistent and non-persistent organic compounds and effects on immune system development. Basic and Clinical Pharmacology and Toxicology 2007;102:146-154

Jaffe, Daniel A., et al. Diesel particulate matter emission factors and air quality implications from in-service rail in Washington State, USA, Atmospheric Pollution Research. Doi: 10.5094/Apr. 2014.040

Jedrychowski WA, Perera FP, Spengler CD, et al. Prenatal exposure to polycyclic aromatic hydrocarbons and cognitive dysfunction in children. Environ Sci Pollut Res Int, 2014, Epub Sep 26 (ahead of publication)

Kalkbrenner, et al. Particulate matter exposure, prenatal and postnatal windows of susceptibility and Autism Spectrum Disorder. Epidemiology 2015; 26:30-42

Krishnan RM, Adar SD, Szpiro AA, et al. Vascular responses to long- and short-term exposure to fine particulate matter, MESA Air (Multi-ethnic study of atherosclerosis and air pollution. J Am College of Cardiology 2012; 60(21):2158-2166

Li N, Sioutas C, Cho A, et al. Ultrafine particulate pollutants induce oxidative stress and mitochondrial damage. Environ Health Perspec 2003; 111(4): 455-460.

Lue S-H, Wellenius GA, Wilker EH, et al. Residential proximity to major roadways and renal function. J Epidemiol Community Health 2013; 67:629-634

Miller KA, Siscovick DS, Sheppard L, et al. Long term exposure to air pollution and incidence of cardiovascular events in women. N Engl J Med 2007;356(5):447-5

Mustafic H, Jabre P, Caussin C, et al. Main air pollutants and myocardial infarction, a systematic review and meta-analysis. JAMA 2012; 307(7):713-721

Newman NC, Ryan P LeMasters G, et al. Traffic-related air pollution exposure in the first year of life and behavioral scores at 7 years of age. Environ Health Perspect 2013; 121(6):731-736

Oregon Live,
http://www.oregonlive.com/environment/index.ssf/2014/04/oregon_oil_train_shipments_inc.html

Pandya RJ, Solomon G, Kinner A, Balmes JR. Diesel exhaust and asthma: hypotheses and molecular mechanisms of action. Environmental Health Perspectives. 2002;110(suppl 1):103-112

Perera FP, Li T, Zhou Z, et al. Benefits of reducing prenatal exposure to coal-burning pollutants to children's neurodevelopment in China. Environmental Health Perspectives 2008; 116(10):1396-1400

Perera FP, Li Z, Whyatt R, et al. Prenatal airborne polycyclic aromatic hydrocarbon exposure and child IQ at age 5 years. Pediatrics 2009; 124(2):e195-202

Perera FP, Wang S, Rauh V, et al. Prenatal exposure to air pollution, maternal psychological distress, and child behavior. Pediatrics 2013; 132(5):e1284-1294

Perera FP, Chang HW, Tang D, et al. Early life exposure to polycyclic aromatic hydrocarbons and ADHD behavior problems. PLoS One. 2014 Nov 5;9(11); PubMed Central PMCID: PMC4221082

Peters A. Ambient particulate matter and the risk for cardiovascular disease. Progress in Cardiovascular Diseases. 2011; 53: 327-333

Peters A, Liu E, Verrier RL et al, Air pollution and incidence of cardiac arrhythmia. Epidemiology 2000; 11(1):11-17

Peters A., Dockery DW, Muller JE, Mittleman MA. Increased particulate air pollution and the triggering of myocardial infarction. Circulation 2001; 103(23):2810-2815

Peterson, BS, Rauh, VA, Perera, F, et al. Effects of prenatal exposure to air pollutants (Polycyclic aromatic hydrocarbons on the development of brain white matter, cognition, and behavior in later childhood, JAMA Psychiatry 2015; doi:10.1001/jamapsychiatry.2015.57

Pieters N, Plusuin M, Cox B, et al. An epidemiological appraisal of the association between heart rate variability and particulate air pollution: a meta-analysis. Heart 2012; 98:1127-1135

Pope CA, III, Burnett RT, Thun MJ et al. Lung cancer, cardiopulmonary mortality, and long term exposure to fine particulate air pollution. JAMA 2002; 287(9):1132-1141

Qian Y, Zhu M, Cai B, et al. Epidemiological evidence on association between ambient air pollution and stroke mortality. J Epidemiol Community Health 2013; 67:635-640

Raz R, Roberts AL, Lyall K, et al. Autism Spectrum Disorder and particulate matter air pollution before, during, and after pregnancy: a nested case-control analysis within the nurses' health study II cohort, Environ Health Perspec 2015; 123(3):265-270

Roberts AL, Lyall K, Hart, JE, et al. Perinatal air pollutant exposures and Autism Spectrum Disorder in the children of nurses' health study II participants. Environ Health Perspect 2013; 121(8): 978-984

Shaw ASV, Langrish JP, Nair H, et al. Global associations of air pollution and heart failure: a systematic review and meta-analysis. The Lancet 2013; 832:1039-1048

Tang D, Li TY, Chow JC, et al. Air pollution effects on fetal and child development: a cohort comparison in China. Environ Pollut. 2014; Feb. 185:90-6. Doi:10.1016/j.envpol.2013.10.019 Epub2013 Nov. PubMed PMID: 24239591

Trasande L, Thurston GD. The role of air pollution in asthma and other pediatric morbidities. J Allergy Clin Immunology 2005; 115(4):689-699

Vrijheid M, Martinez D, Manzanares, S, et al. Ambient air pollution and risk of congenital anomalies: a systematic review and meta-analysis. Environmental Health Perspectives 2011;119(5) 598-606

Volk HE, Lurmann F, Penfold B, et al. Traffic-related air pollution, particulate matter, and autism. JAMA Psychiatry 2013; 70(1):71-77

Volk HE, Hertz-Picciotto I, Delwiche L, et al. Residential proximity to freeway and autism in the CHARGE study. Environ Health Perspect 2011; 119(6):873-877

Wei Y, Davis J, Bina WF. Ambient air pollution is associated with the increased incidence of breast cancer in US. Int J Environ Health Res 2012: 22(1):12-21

Wellenius GA, Schwartz J, Mittleman MA. Air Pollution and hospital admissions for ischemic and hemorrhagic stroke among Medicare beneficiaries. Stroke 2005; 36(12):2549-2553

Wellenius GA, Burger, MR, Coull BA, et al. Ambient air pollution and the risk of acute ischemic stroke. Arch Int Med 2012; 172(3): 229-234

Wilker EH, Preis SR, Beiser AS, et al. Long-term exposure to fine particulate matter, residential proximity to major roads and measures of brain structure. Stroke 2015, May DOI:10.1161/STROKEAHA.114.008348

WHO 1—World Health Organization http://www.who.int/mediacentre/factsheets/fs313/en/#

WHO 2— World Health Organization/ American Cancer Society

http://www.cancer.org/cancer/news/world-health-organization-outdoor-air-pollution-causes-cancer

WHO 3— World Health Organization. Health aspects of air pollution with particulate matter, ozone, and nitrogen dioxide. Bonn: World Health Organization; 2003

WHO 4—World Health Organization. Outdoor Air Pollution. Global Health Observatory. Available at http://www.who.int/gho/phe/outdoor_air_pollution/en/index.html

Response GP381-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant. The Final EIS also reflects lower onsite emissions of criteria air pollutants from mobile sources.

To provide perspective, the most recent U.S. Environmental Protection Agency (EPA) National Air Toxic Assessment based on 2011 air emissions has the statewide average air toxic cancer risk at 43 per million and Grays Harbor County at 20 per million. However, EPA excludes diesel particulate matter from cancer risk analysis because there is too much uncertainty about the cancer potency value to assign a numerical value for diesel particulate matter. If diesel particulate matter is responsible for cancer risk similar to that found in Puget Sound by the Puget Sound Clean Air Agency and contributes 78% of the additional cancer risk, then a one-in-a-million increase from the proposed action would represent about a 1% increase over current air toxic risk levels. In addition, non-cancer chronic exposures are assessed based on a reference exposure level, which for diesel particulate matter is 5.0 micrograms per cubic meter. A chronic hazard index is calculated by dividing the annual average concentration of a toxic pollutant by the chronic reference exposure level for that pollutant. The reference exposure level is a level at or below which no adverse health effects are anticipated following long-term exposure. Thus, if the chronic hazard index is less than 1.0, the pollutant is not considered to pose a significant risk or adverse non-cancer health effects. The chronic hazard index for the nearest resident is 0.0007 and therefore does not represent a substantial risk. To date, EPA and the Office of Environmental Health Hazard Assessment have not found sufficient evidence to fully understand the mechanism of exposure and clear dose-response relationships for these acute responses, and have precluded development of recommendations about levels of exposure that would be protective.

GP382, **Kircher, Marjorie**

Comment GP382-1

My name is Marjorie Kircher. Thank you for this opportunity to comment on the oil terminal proposed for Grays Harbor. There are many serious health and safety concerns around this project, and you will hear about those in detail from many concerned citizens today.

I have a particular health concern in generating -- greatly improving pollution throughout the region. And I urge you to reject these proposals because I don't think the damaging effects of these projects cannot be mitigated.

I've worked as a pediatric occupational therapist in special education in Vancouver, Washington for over 25 years.

We in the public education have witnessed profound increase in the number of children per capita with neurodevelopmental disorders such as autism, attention deficit, hyperactivity disorder, learning disabilities, and cognitive delay.

And the Center for Disease Control corroborates this increase in their recent accounts of pediatric disorders on their website. This is likely due in part to increasing exposure to neurotoxic chemicals in the environment.

Scientific studies published recently have correlated that early life exposure to diesel particulate exhaust causes autism, ADHD, lower IQ, and cognitive function, and increased bouts of anxiety, depression, and destructive behavior.

Diesel components can cause permanent damage to the developing neurosystem at low levels. If the terminal is built, an increase in our regional population exposure to neurotoxins double in this county alone. The DEIS states increased rail traffic would almost double emissions of criteria pollutants.

Response GP382-1

Refer to Response to Comment GP381-1.

GP383, **Kirk, Ruth**

Comment GP383-1

October 28, 2015

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

The EIS is definitely mistaken in saying there is little likelihood of a major earthquake any time soon. Please correct this to incorporate current geological and seismic expertise. The whole concept of transporting so much oil by rail is a bid for disaster as has been shown elsewhere by spillages, pollution, explosions, and fires. Let's learn from those tragedies and not set Washington up for a repeat.

Sincerely, Ruth Kirk 2231 Marina Lane S.E. Lacey, WA 98503-3186

Response GP383-1

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies. Final EIS Chapter 3, Section 3.1, *Earth*, clarifies language characterizing the likelihood of events.

GP384, **Kocer, Dianne**

Comment GP384-1

The Revenue Stream to the 'Taxing Authority" for Westway is $1,217,000 Annually for 49,041 BPD x 365 = 17.90 Million Barrels The Revenue Stream to the 'Taxing Authority" for Imperium is

$1,641,400 Annually for 78,166 BPD x 365 = 28.53 Million Barrels The Revenue Stream to the 'Taxing Authority" for the Westway & Imperium is $2,858,400 Annually for 127,207 BPD x 365 = 46.43 Million Barrels The Result is the 'Taxing Authority" receives $2,858,400 divided by 46,430,000 Barrels = $0.0615 per Barrel Crude Oil on the Open Market is between $40 and $100 per Barrel or $26,400 to $66,000 per Rail Car and the Local Revenue Stream is Six Cents Per Barrel So Each of the 70,280 Full Rail Cars annually of Crude Oil carrying 660 Barrels of crude oil yields the 'Taxing Authority" $40.59 Each of the Empty Rail cars yields the "Taxing Authority" zero. Source: William Brake, retired engineer It is very obvious from the figures above that revenue to local governments is a tiny pittance compared to the profits to the oil producers. It would be more cost effective if the State of WA provided the 2.5 million for 5 years to the Grays Harbor communities to develop green industry for the people of Grays Harbor rather than risking the millions that remediation would cost the tax payers. "In 2010, the Environmental Protection Agency estimated the cost of cleanup was increasing beyond the current funding needed for Superfund sites. In the past decade, EPA allocated $243 million per year for Superfund cleanup. It estimates $335 million to $681 million per year will be needed for future cleanup. The EPA attempts to bill the company responsible for contamination. Sometimes, the company no longer exists or is bankrupt, so the EPA pays for cleanup out of the Superfund trust, previously funded by a tax on petroleum products. The tax was discontinued in 1995." The risks vs the value added to the communities just do not pencil out.

Response GP384-1

Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action. Draft EIS Section 7.1.4*, What are the potential impacts on economic conditions*? reports estimated tax revenues from construction and operations developed through the IMPLAN analysis (Appendix O, *Economic Impact Analysis*). Tax revenue is only one aspect of the social and economic impacts of the proposed action. Other considerations can be found in Section 7.1.4, *What are the potential impacts on economic conditions?* Section 7.3.3, *What are the benefits of the proposed action?* and Section 7.3.4, *What are the costs of the proposed action?* Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP385, **Kocer, Dianne**

Comment GP385-1

In reading the DEIS I found it interesting that the following statement was repeated a number of times: "No mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill." Given the train derailments with the consequent dumping of toxic oil into rivers and soil logic would dictate that with the proposed traffic for these two terminals over a 100+ year old rail system, it is inevitable there will be derailments and spills. If, as stated above, there are no mitigation measures possible, then it seems very clear that this project should be denied.

Response GP385-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP386, **Kocer, Dianne**

Comment GP386-1

Highlighting inextricable relationships between navigable waters and the atmosphere, and finding that separating the two is "nonsensical," the judge found the public trust doctrine mandates that the state act through its designated agency "to protect what it holds in trust." The court confirmed what the Washington youth and youth across the nation have been arguing in courts of law, that "[t]he state has a constitutional obligation to protect the public's interest in natural resources held in trust for the common benefit of the people." The above represents the ruling of Judge Hill. Further, "This ruling means that what the Department of Ecology does going forward in its rulemaking has to protect us, the kids of Washington, and not just us, but future generations too, like my children and those to come. Now they can't decide to protect short-term economic fears and ignore us because we have constitutional and public trust rights to a stable climate!" The DEIS for the proposed Grays Harbor terminals doesn't even come close to demonstrating the breadth of commitment to the public trust over short-term economic concerns that this ruling requires. WA can do much better and we are depending upon you to do that.

Response GP386-1

Comment acknowledged.

GP387, **Kolberg, Dave**

Comment GP387-1

I'm Dave Kolberg, I'm from Vancouver, Washington. SEPA law requires that the DEIS for these two projects consider the greenhouse gas emissions to determine if they might reach a level of significance. The statements considered the emissions on-site those produced by rail traffic within the state of Washington and those produced by end users. But the statements don't include the math additions to do exploratory oil or wells in North Dakota.

Because fracking oil is worth more than the natural gas that leaks from the wells, during their process, drillers in 2012 cleared out $1 million worth of natural gas. That's the equivalent of a million cars on the road at that period.

Fracking for oil is five times more energy intensive. It also requires additional energy to transport the massive amounts of water during the fracking process adding to its greenhouse footprint.

Can DEIS consider these emissions a new and existing source? According to DEQ's own greenhouse gas guidance document, the answer is yes.

According to WAC 197-11-060-4B in assessing the significance of an impact, a lead agency shall not eliminate consideration of proposed impact within its jurisdiction including local or state boundaries.

If we consider these emissions, why wouldn't we, especially considering the unprecedented fire season we've just experienced. In May, the Olympic Forest caught fire. Wild fires have charred 300,000 acres this year in Washington state and faced fire seasons longer than 1950.

Scientists at the National Oceanic and Atmospheric Administration predict in parts of the west large fires will increase by six fold.

Let's get this right. Heaven help us.

Response GP387-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

GP388, **Krueger, Katherine**

Comment GP388-1

As a former environmental attorney for major petrochemical companies in Texas, I am acutely aware of what can go wrong at every stage of operations: rail car, transfer, dock storage, transfer, and ship. Because of the richness of the fishery in the Grays Harbor area (and the whole WA coast) and the number of industries that depend on that fishery (commercial fisheries and satellite businesses, tourism) and the risk to drinking water, and the cost and time involved in cleanup of material that is hazardous in nature--even though oil and gas are exempted from this category as a matter of law--this location is ill advised as a major harbor for petrochemical transport. It is of concern whether a spill could be contained sufficiently to only impact the immediate area, as well. I don't believe the present protections against spill, or the present plans for cleanup, are sufficient to avoid huge safety concerns (e.g., fire) or economic loss (from contaminants) in such event, and ensuing irreparable harm to people's livelihoods. We already have harbors set up for this type of work, such as Tacoma. We should limit the areas in which such disasters can cause environmental/economic harm, rather than increase them.

Response GP388-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP389, **Lacefield, Lily**

Comment GP389-1

My name is Lily Lecefield. And the reason why I want to say something is because if the trains coming in with oil, that the people might move. And so Aberdeen will lose all its people so it will be like a big ghost town.

And there was this guy who was talking about -- in the big theater. He was talking about the birds that died in Ocean Shores and that they had to pick up more than 100 birds. And there's a fridge full of dead birds. And that they had to pick up all the birds that were running around with oil stuck to their wings. So, yeah.

And that guy was so mean to those three singing ladies.

Response GP389-1

Comment acknowledged.

GP390, **LaDuca, Kimberly**

Comment GP390-1

The most significant issue with the Draft Environmental Impact Statements is that is has an unacceptable area of study. The DEIS cannot limit its analysis of the impacts associated with the rail transport of Bakken Crude to the PS&R rail line. Thus, the DEISs are inadequate because they fail to consider the foreseeable cumulative impacts to rail traffic, human health and safety and the environmental degradation posed by oil spills along the entire rail-line transporting the Bakken Crude. The Westway and Imperium Project proposals pose unavoidable significant impacts to human health, safety and the environmental that cannot be mitigated. The SEPA EIS process must fully evaluate and discuss all impacts, including climate change impacts and the catastrophic threat to human life posed by these proposals. The DEIS analysis of the threat to human health and safety and to the environment in the event of a derailment and spill is inadequate and fails to address the actual threat of mile-long oil trains. The DEIS limited the scope of its rail traffic and human safety analysis to the PS&R line and fails to consider the impact of increased rail traffic and the safety threat of more oil trains throughout all of Washington State. Especially given the fact that BNSF has only one rail line that transports Bakken Crude from North Dakota into Washington and through Spokane, the impact to Spokane must be included in the EIS. Furthermore, the EIS must address the cumulative impacts to communities throughout our state where oil-trains pose a catastrophic adverse impact to human health and safety and the environment. Specifically, the impacts to Seattle, which acts as a hub for oil transported throughout the state and is the state's financial epicenter, must be included. The DEIS also woefully minimizes the actual threat posed by a derailment at any speed. The EIS needs to address the fact that a derailment would cause irreparable harm to the environment in which the spill occurred but also a catastrophic loss of human life. The catastrophic threat of a derailment in downtown Seattle, especially in the 100-year-old tunnel or near the stadiums which can hold up to sixty-thousand fans at a time, is an unacceptable risk that cannot be mitigated. 14 of the last 16 oil train derailment spills have caught fire. With the amount of trains rolling through our area if this project is approved, an event like that is almost certain to happen in Washington State. 6 of the 7 tanker trains that derailed and ruptured this year have caught fire. A

derailment on the main BNSF rail line could eviscerate Downtown Seattle and its economy because the financial center falls within one-mile of the potential blast radius. Importantly, the DEIS is inadequate because it fails to consider the full greenhouse gas emissions of these projects. It does not include GHG emissions associated with refining and burning the billions of gallons of Bakken crude that will be transported and stored at these facilities. The failure to consider climate change impacts violates SEPA. Importantly, the Department of Ecology's guidance on SEPA specifically states that climate change impacts from greenhouse gases are an adverse environmental impact to be considered under SEPA. (Q&A SEPA and Greenhouse Gas Emissions pg 2) It states, "There is no basis for excluding greenhouse gas emissions and climate impacts from SEPA review. SEPA requires the consideration of environmental impacts that are likely, not merely speculative. The environmental impacts resulting from greenhouse gas emissions are reasonably foreseeable." The DEIS also fails to consider the impacts to recreation if a derailment or spill occurs. The DEIS limits its analysis of recreational impacts to the impacts associated with normal operation of the facilities. The DEIS must consider Gray's Harbor importance for fishing and crabbing habitat.

ATTACHMENT 1: LaDuca Law PLLC, Kimberly LaDuca

My name is Kimberly LaDuca and I am a licensed attorney in Washington specializing in environmental law and managing attorney at LaDuca Law PLLC. I am a first-time homeowner in Downtown Seattle and live and work less than two blocks from the BNSF main rail line in Belltown. Both the Westway and Imperium Projects concern me both professionally and personally because they pose significant threats to human safety and the environment which cannot be mitigated.

The most significant issue with the Draft Environmental Impact Statements is that is has an unacceptable area of study. The DEIS cannot limit its analysis of the impacts associated with the rail transport of Bakken Crude to the PS&R rail line. Thus, the DEISs are inadequate because they fail to consider the foreseeable cumulative impacts to rail traffic, human health and safety and the environmental degradation posed by oil spills along the entire rail-line transporting the Bakken Crude. The Westway and Imperium Project proposals pose unavoidable significant impacts to human health, safety and the environmental that cannot be mitigated. The SEPA EIS process must fully evaluate and discuss all impacts, including climate change impacts and the catastrophic threat to human life posed by these proposals.

Currently there are no crude oil storage facilities in Gray's Harbor. By seeking to expand and merely retrofit their facilities, Westway and Imperium are able to avoid other permitting processes that could prevent a "new" crude oil storage facility. These two projects are not "Expansion Projects" because neither facility is expanding current crude oil operations. Since Westway and Imperium currently have no capability to process, store or transport crude oil, these projects are new crude oil storage facilities that will increase the amount of crude oil being transported into and throughout Washington. The new adverse impacts to Gray's Harbor, which cannot be mitigated, require that this new expansion of crude oil facilities be denied.

The threat to human health and safety and the environment in the event of a derailment and spill is inadequate and fails to address the actual threat of mile-long oil trains. The DEIS limited the scope of its rail traffic and human safety analysis to the PS&R line and fails to consider the impact of increased rail traffic and the safety threat of more oil trains throughout all of Washington State. Especially given the fact that BNSF has only one rail line that transports Bakken Crude from North Dakota into Washington and through Spokane, the impact to Spokane must be included in the EIS. Furthermore, the EIS must address the cumulative impacts to communities throughout our state

where oil-trains pose a catastrophic adverse impact to human health and safety and the environment. Specifically, the impacts to Seattle, which acts as a hub for oil transported throughout the state and is the state's financial epicenter, must be included.

The DEIS also woefully minimizes the actual threat posed by a derailment at any speed. The EIS needs to address the fact that a derailment would cause irreparable harm to the environment in which the spill occurred but also a catastrophic loss of human life. The catastrophic threat of a derailment in downtown Seattle, especially in the 100-yearold tunnel or near the stadiums which can hold up to sixty-thousand fans at a time, is an unacceptable risk that cannot be mitigated. 14 of the last 16 oil train derailment spills have caught fire. With the amount of trains rolling through our area if this project is approved, an event like that is almost certain to happen in Washington State. 6 of the 7 tanker trains that derailed and ruptured this year have caught fire. A derailment on the main BNSF rail line could eviscerate Downtown Seattle and its economy because the financial center falls within one-mile of the potential blast radius.

Response GP390-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment GP390-2

Importantly, the DEIS is inadequate because it fails to consider the full greenhouse gas emissions of these projects. It does not include GHG emissions associated with refining and burning the billions of gallons of Bakken crude that will be transported and stored at these facilities. The failure to consider climate change impacts violates SEPA. Importantly, the Department of Ecology's guidance on SEPA specifically states that climate change impacts from greenhouse gases are an adverse environmental impact to be considered under SEPA. (Q&A SEPA and Greenhouse Gas Emissions pg 2) It states, "There is no basis for excluding greenhouse gas emissions and climate impacts from SEPA review. SEPA requires the consideration of environmental impacts that are likely, not merely speculative. The environmental impacts resulting from greenhouse gas emissions are reasonably foreseeable."

Response GP390-2

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Comment GP390-3

The DEIS also fails to consider the impacts to recreation if a derailment or spill occurs. The DEIS limits its analysis of recreational impacts to the impacts associated with normal operation of the facilities. Most importantly, the DEIS must consider Gray's Harbor importance for fishing and crabbing habitat. It is noteworthy that this ignores the concerns of both the Quinault Indian Nation and the Commercial Fisheries Coalition, which are united on opposing these projects due to the threat to fisheries.

Response GP390-3

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe potential impacts on recreation, fishing, aquatic habitat, and tribal resources in the event of an oil spill, fire, or explosion. Section 4.7 has also been revised to clarify that in the event of a spill, fire, or explosion, there is the potential to affect all the resources in the study area, which, as described in Chapter 3, *Affected Environment, Impacts, and Mitigation*, include recreational resources, tribal resources, and commercial fishing.

GP391, **LaDuca, Kimberly**

Comment GP391-1

My name is Kimberly LaDuca and I'm an environmental attorney practicing in Washington. The Westway and Imperium proposals concern me both professionally and personally.

I work two blocks away from the BNSF north/south main line in downtown Seattle. Mile-long oil trains block off the Seattle waterfront from the rest of the city at a minimum of twice a day, usually during high tourist times like sunset.

I also worked near the stadiums right next to the BNSF main railway from February to August, where I witnessed the real impact of oil trains in Seattle. I also know personally that they are running past the stadiums when Mariner games are taking place, and that there's no -- even though the City of Seattle has said that they don't want to allow having trains run when there could be casualties in tens of thousands, there's no control over it.

The draft EIS does not adequately address any of these impacts. It only focuses on the PS&R line and pays lip service to the extended rail traffic. We know that the BNSF's main line will be burning four more oil trains per day, increasing the likelihood of highly volatile explosive trains, threatening the safety of over 600,000 people in Seattle and the water quality of the Puget Sound.

However, the impacts to Seattle are not the most important. That would be to the local communities. I am raising these because the DEIS fails to consider them. The DEIS minimizes the threat of exploding oil trains, what the impact would be if one of these trains derails, and not if, but when. It does so by looking at historical data on train explosions, and writes off recent oil train tragedies by stating that these derailments were caused and -- are less likely when trains are at low speeds.

Even if oil trains go 10 miles an hour on the PS&R line, the DEIS states that trains can travel up to 45 miles per hour through downtown Seattle. And it fails to address the catastrophic impact that derailment would have. And last summer, we had a train that derailed going five miles per hour -- an oil train.

This is not an expansion proposal because you cannot expand operations that do not currently exist. The proposal is to build new facilities and expand the business of two corporations with no benefit to the public of Washington.

Thank you.

Response GP391-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP392, **Langley, Veronica**

Comment GP392-1

As a citizen of Washington I am opposed to turning the Grays Harbor Estuary into an industrial zone. Given the sad state of the U.S. rail infrastructure in general, and the 59-mile rail line from Centralia in particular, it is guaranteed that oil will end up in the estuary. The DEIS itself finds that the risks of oil spills during rail transport, at the terminal site, and during marine vessel transport cannot be fully mitigated if a spill occurred and the environmental damage would be significant. Pleas stop caving into pressures from oil companies and big business that put our natural resources and families in danger. The moral issues must begin to outweigh the monetary gains of big business or there will nothing left for our children to inherit. Stop this project now, before it is too late.

Response GP392-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident.

Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP393, **Lanz, James**

Comment GP393-1

Dear Consultants, Ecology and City of Hoquiam. I'm a resident of Washington state and live in Vancouver, WA. I'm very concerned about the increased number of oil trains that will travel alongside the Columbia River and pass through my city as a result of the Westway and Imperium Oil Terminals proposed for Grays Harbor.

I am very concerned about the potential environmental damage that would result from an oil train derailment and oil spill next to the Columbia River.

In addition, I am very concerned about the risk of an oil train explosion as trains pass through my community. I believe the people of the State of Washington have the right to decide which risks they are willing to accept and which they are not, and just because some dangerous projects were permitted, that doesn't mean we should approve of more of them.

I urge you to reject the oil terminals proposed in Grays Harbor because they will create the following significant and adverse impacts which cannot be avoided or mitigated and are unacceptable.

• The tank cars cannot be made crashworthy. Non-yard oil train derailment spills are guaranteed to happen in the extended area several times per decade. An oil spill would have significant and adverse impacts that cannot be prevented or mitigated. At best only 14% of the oil is recovered in a spill. Crude oil contains benzene which cannot be recovered from the water.

• The oil vapor pressure cannot be lowered enough to prevent ignition. When tank cars are punctured during a derailment, gases rush out and find a spark. Non-yard derailment spills usually lead to fire. Oil train fires are likely to cause burns, deaths, and property damage. Burns, deaths, and property damage are significant adverse impacts that cannot be prevented or mitigated.

• Until all the tank cars have thermal jackets and high capacity pressure relief valves, tank cars sitting in a pool fire, are likely to explode. Firefighters cannot protect the public in those cases. Oil train explosions will be impossible to prevent for nearly a decade.

• Oil trains block traffic. They interfere with commerce, emergency response and school buses. The adverse impacts will be significant. There is no practical way to mitigate for blocked traffic.

Response GP393-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

GP394, **Lanz, James**

Comment GP394-1

Dear Consultants, Ecology and City of Hoquiam. I am a resident of Vancouver, WA and I am very concerned about the proposed oil terminals proposed in Grays Harbor. I urge you to reject them because they will create the following significant and adverse impacts which cannot be avoided or mitigated and are unacceptable.

• On some days the oil terminal will stink, particularly if the vapor combustion units fail. The city of South Portland Maine has banned the trans-loading of crude oil into marine vessels for that reason. Hydrogen sulfide first deadens the sense of smell, and then it kills you. It gets trapped in low-lying pockets.

Response GP394-1

Final EIS Chapter 3, Section 3.2, *Air*, was revised to include a discussion of potential impacts related to odor. The only compound with sufficient emissions to have the potential to have a perceptible odor is hydrogen sulfide. The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, are expected to reduce emissions of air pollutants, including hydrogen sulfide, to below the odor threshold for the most sensitive individual. As described in Section 3.2 the proposed action is subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping requirements for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and proposed applicant mitigation that would reduce potential impacts on air quality.

Comment GP394-2

False Prosperity. An oil terminal can only begin the slide toward altering the landscape, river, and quality of life here. There will be no other direction once it begins. The construction unions in Texas oil towns have been starved to death. And once they've got their foot in the door, big oil is as happy as any other corporation to break unions. The prosperity we're being offered is a poison pill. This cannot be mitigated or avoided.

Response GP394-2

Comment acknowledged.

Comment GP394-3

The proposed oil terminals will lead to a net increase of greenhouse gas emissions. If all the terminals in Washington and Oregon are approved, the net global oil production could increase 496,000 barrels per day. This is additive. This is not simply replacing one oil source for another. The increases must be mitigated.

Response GP394-3

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and for information on the likely destinations of crude oil shipped through the proposed facilities.

Comment GP394-4

Lost property values More than reported in the Economic Impact Analysis Planning model used by ECONorthwest. That model doesn't distinguish between unit oil trains and other types of freight. These adverse impacts are significant and cannot be mitigated or avoided.

Response GP394-4

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

Comment GP394-5

The Cost of Emergency Preparedness in all rail communities. NTSB says emergency response planning along the rail routes is "practically nonexistent".

Response GP394-5

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities in the study area. For more information about the analysis of potential impacts on the BNSF main line, refer to the Master Response for the Geographic Scope of the EIS.

Comment GP394-6

Spill Cleanup delays. It took decades for the spill to be cleaned up in the town of Skykomish. Buildings had to be moved. The delays were significant and are unlikely to be avoided in the future.

Response GP394-6

Section 4.7, *Impacts on Resources*, describes the general types of impacts on resources that would be expected as a result of an oil spill. Final EIS Section 4.7 has been revised to acknowledge the potential for more lasting impacts as the result of a spill.

GP395, **Larson, Carrie**

Comment GP395-1

While the EIS addresses all manner of issues raised by the initial scoping period, the findings indicate the ludicrous nature of expanding these facilities and more than doubling train traffic—greatly increasing the odds of a derailment and spill—to this fragile area. If we look at the impact to vehicular traffic due to train crossings, we can see that waits of up to 52 minutes multiple times per week to the retail hub that is Olympic Gateway Plaza are simply unacceptable. Not only for emergency vehicle access but for other commercial enterprises—employees or delivery vehicles—and the general public. With no knowledge of when a train might come along, a parent stopping on an errand prior to picking up a child from school might not be able to reach that child for nearly an hour. All manner of seemingly "insignificant" outcomes can lead to many potentially dangerous situations. What about access to other Port businesses being blocked in similar ways? Why should one industry trump another? All this for potentially 36 direct jobs?

Response GP395-1

Final EIS Chapter 3, Section 3.16.8, *Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?* clarifies that, while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP395-2

The Westway Expansion project proposes halting vessel operation for two weeks each year during the Shorebird Festival to reduce impacts on the natural environment. This token attempt by industry to placate environmentalists is insulting to the public's intelligence. If the danger is so great that we shouldn't ship oil when shorebird stopovers are at their peak, what about other animals that make this estuary their home throughout the year?

Response GP395-2

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading

operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification.

Comment GP395-3

The EIS itself describes the unique nature of many of our area's species and habitats. The EIS states "Because the cumulative projects, including the proposed action, would have unavoidable and significant adverse environmental impacts on noise, tribal resource, vehicle traffic, and environmental health and safety, the proposed action would contribute to unavoidable and significant adverse environmental cumulative impacts on these resources." The environmental risk to our community—our people, our livelihoods, our unsullied natural bounty—is too great to allow these proposals to move forward. Everything is situated too close to a waterway, where spills would flow out, increasing damage exponentially. The Westway and Imperium expansion projects must be stopped and additional oil trains should not be allowed through Grays Harbor County.

Response GP395-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP395-4

When a spill occurs—and it will be when, not if—who would pay or be made to pay? And how easy is it for a company to declare bankruptcy and walk away after the damage is done? Would any insurance company be willing to cover these transports at a level that could feasibly pay for the cost of cleaning up a major spill? And how could any level of compensation restore our way of life or our environment after such destruction took place? The rural poor should not be devastated so that big industry can make a buck.

Response GP395-4

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP396, **Larson, Don**

Comment GP396-1

Hi. My name is Don Larson. I'm from Seattle, King County. And I just want to make a couple short comments. I'm opposed to this project based on safety and security concerns, and also environmental concerns.

If a train derailed it would have potentially catastrophic effects on local populations and communities along the rail route. And I'm also concerned that transport of oil by rail could be potentially very damaging to the waterways that runs along.

I grew up in Vancouver, Washington, and I spent many hours in the Columbia Gorge. And if you've been through the Gorge you know that that rail line runs just within feet of the Columbia River. And anything could cause a derailment; human error, a rock slide, storm damage. And if it tipped over into the river that would be extremely damaging to the economy of the Gorge which is mostly based on recreation and tourism. So potentially a lot of jobs could be lost and those highways could be shut down east and west. And people that are in the Gorge have nowhere to go. They're pinned in by the mountains.

And then as far as costs go, it would mostly be the public that would shoulder the risk of any costs. And the oil industry usually winds up paying pennies on the dollar. It's just part of their business plan. Thank you.

Response GP396-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Draft EIS Chapter 4, *Environmental Health and Safety*, Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP397, **Larson, Donald A. (Organized Workers for Labor Solidarity)**

Comment GP397-1

November 25, 2015 Seattle, Washington

To Westway and Imperium Expansion Projects:

The Westway and lmperium Oil Terminal Projects should not be permitted to proceed. Business as usual should be denied. Oil leaks, large and small, from ruptured tanks caused by derailments or ships and barges running aground threaten the health and security of humans and all inhabitants of our environment.

We can no longer pretend that it is normal for mile long oil trains to carry millions of gallons of explosive, toxic cargo through our towns and communities and along our waterways.

We can no longer pretend that these millions of gallons of oil, when burned, have no effect on our climate.

We, the people, are our own best scientists. We know there is something seriously wrong with our climate. Our own observations over many years tell us this is so.

Trains running along the Chehalis River and ships and barges maneuvering through a dredged channel in Grays Harbor, represent a danger to us all. Ask crab harvesters in Grays Harbor what they think about expanded oil shipments. How about tribal and recreational salmon fishermen? Don't

forget to ask the oyster farmers of Willapa Bay. We know what they would say. Their livelihoods are on the line. Tourist related jobs such as the Shorebird Festival of Grays Harbor would also suffer as would numerous job categories.

It's time to quit pretending that this is a simple economic transaction between the Port of Hoquiam and the oil industry. The repercussions of this decision go well beyond the artificial boundaries of this draft Environmental Impact Statement. Climate change happens in everyone's backyard. The backyard of planet Earth. Climate change recognizes no national boundaries. Let's not enable the fossil fuel industry by permitting these oil terminals. Instead, let's work to develop alternative fuel sources. Let's draw a line in the sand and move towards a cleaner environment and a hopeful future.

Let us join our neighbors to the south, Portland, Oregon, whose city council, in November 2015, voted to oppose the expansion of infrastructure for transporting or storing fossil fuels in Portland or nearby waterways.

The time for taking action is past due. There is no time like now to start.

Organized Workers for Labor Solidarity

Donald A. Larson 8422 41st Ave S.W. Seattle, WA 98136

Response GP397-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP398, **Larson, Erik**

Comment GP398-1

The purpose of the EIS process as created by NEPA is to quantify and compare several possible actions (and the no-action alternative) in order to advise agencies in decision making. The dEIS submitted for both the Westway and Imperium projects does not quantify significant risks associated with the projects which cannot be completely mitigated. Chapter 7 of each dEIS states, "... the cost-benefit analysis considers costs that may accrue to the City of Hoquiam related to preparing for the potential consequences rather than the costs that may be incurred related to cleanup activities and related degradation." In order for the cost-benefit analysis to accurately quantify the costs of each action, this information cannot be excluded. These costs may be estimated as an annualized risk using normalized data from oil spill responses, and the associated clean-up costs, as documented by the EPA and the return periods for each spill scenario addressed in Chapter 4. Also included should be the value of all resources at risk from each scenario, adjusted to account for probability of inclusion in the affected area. In addition to providing a more accurate cost-benefit analysis, this information would also be important in policy decisions on asset/insurance minimums required to ensure any potential financial liabilities are underwritten.

Response GP398-1

The EIS is being prepared under the Washington State Environmental Policy Act (SEPA) under RCW Chapter 43.21C, the SEPA Rules (Chapter 197-11 WAC), and HMC 11-10. Refer to the Master Response for Purpose and Focus of the EIS.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP399, **Larson, John**

Comment GP399-1

November 30, 2015

Westway and Imperium Terminal Services Expansion Projects EISs

To whom it may concern:

I am writing to comment and express a number of concerns regarding the proposed Imperium and Westway crude oil terminal projects.

Though trains travelling over the historic Northern Pacific route into Grays Harbor have a long history of hauling all manner of cargo – even bulk hazardous liquids – nothing in the past rivals the volume of shipments being proposed in these two crude oil plans. Imperium is proposing to add two unit trains per day, Westway is seeking to add 1.25 unit trains a day. Though not under consideration here, a third company, U.S. Development Corp. is seeking to add its own bulk shipping station with at minimum a similar number of trains each day.

Considering the Puget Sound and Pacific Railroad's already busy rail business on Grays Harbor – hauling automobiles, agricultural products, other bulk liquids, lumber, etc. – does the existing rail infrastructure have the capacity to safely handle this greatly increased rail traffic? The three recent derailments on this railroad suggest that the existing single line may not be able to safely withstand even existing heavy use. Much of the railroad's route through Grays Harbor comes in close proximity to fragile aquatic lands and across numerous streams and several rivers.

Response GP399-1

Draft EIS Chapter 3, Section 3.15.5.2, *Proposed Action*, presents the rail traffic, capacity, and grade-crossing occupancy impacts from the construction and routine operation of the proposed action and Chapter 6, Section 6.5.4.2, *Cumulative Impacts*, presents the rail traffic, capacity, and grade-crossing occupancy impacts that could result from the routine operation of the cumulative projects. Operation of the cumulative projects at maximum throughput would add 1,553 unit train trips per year (4.25 trips per day on average) along the PS&P rail line to the approximately 1,100 train trips per year (three trips per day on average) under the no-action alternative (Section 3.15, *Rail Traffic*). Rail traffic from the cumulative projects at maximum throughput added to baseline rail traffic would equal approximately 7.35 trips per day on the PS&P rail line. Based on simulation modeling (Section

3.15, *Rail Traffic*), the PS&P rail line currently has the capacity to handle up to 12 trips per day, although, as with the existing traffic, delays along the rail line may occur. Current rail traffic along the PS&P rail line is approximately 3 trips per day. The addition of approximately 4.25 trips per day between Centralia and the project site can be accommodated without any improvements to the existing rail line. Section 3.15.4.7, *Current PS&P Rail Line Capacity and Operations*, provides more information on the capacity of the PS&P mainline.

Comment GP399-2

During the summer of 2011, I had the privilege of driving the PS&P rail line twice in a Suburban "high rail" vehicle with the railroad's general manager (as Director of Hoquiam's Polson Museum, I was charged with giving a presentation on the history of the rail line to guests at the Greater Grays Harbor "Showcase" tour that year). Such a firsthand look at the rail line from Hoquiam to Oakville was eye opening then but especially in light of the current proposals to bring crude oil to Grays Harbor. As detailed throughout section 3.15.4, there are a number of rail line locations that require reduced speed due to known deficiencies in the rail line. The long stretch that parallels the Chehalis River west of Montesano especially comes to mind when thinking of a poor rail subgrade in direct proximity to a fragile waterway ecosystem. Though the railroad has stated they plan to make upgrades, I am doubtful that Grays Harbor's soil and climate conditions would guarantee the 100% safe passage of crude oil tank cars day in and day out, year after year.

Response GP399-2

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP399-3

In addition to the environmental dangers posed by adding such a dramatic increase in hazardous-cargo rail traffic to Grays Harbor, the impact to personal and commercial vehicular transportation will pose ongoing problems and inflict economic hardship to nearby businesses. Though the railroad's entrance to East Aberdeen in front of the Gateway Mall is sure to be an even worse problem than it is now, crude by rail traffic will snarl vehicular traffic at rail crossings elsewhere in the county and especially along the Port Dock Road.

Response GP399-3

Refer to Draft EIS Chapter 3, Section 3.15, *Rail Traffic,* and Section 3.16, *Vehicle Traffic and Safety,* for information on impacts on rail traffic and vehicle traffic and safety.

Comment GP399-4

In thinking generally about the prospect of crude oil being transported to and shipped from Grays Harbor, I am left asking some broad yet crucial questions:

- Does adequate manpower, money, and equipment exist to handle crude oil contamination of our waterways in the event of a derailment or tanker spill?

Response GP399-4

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP399-5

Has any consideration been given to establishing a special tax on the rail and water shipment of crude oil to be banked as an insurance fund to cover the broad costs of damages done by a spill or explosion?

Response GP399-5

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP399-6

Is there even a way to accurately calculate what impact a crude oil catastrophe could have on Grays Harbor economically or environmentally? And if so, would the introduction of high-volume crude oil shipments have such a substantial net economic benefit to a large enough percentage of Grays Harbor's population to outweigh the ruin such a disaster could bring?

Response GP399-6

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of

associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP399-7

I am fearful that no matter what precautionary measures are taken to prevent an environmental catastrophe, any small economic gains cannot outweigh the potential losses that are sure to come. I urge those charged with oversight of these projects to reject granting their permits.

Sincerely,

John Larson
Hoquiam, Washington

Response GP399-7

Comment acknowledged.

GP400, **Larson, Ralph**

Comment GP400-1

Gentlemen, As a 74 year resident of Aberdeen, whose family came here in 1910, I am 100% in favor of crude by rail. I remember Standard oil docks at Junction City, and numerous oil tank farms at Port Dock. No spills then and there won't be any now! What do the environmentalists want us to do? Starve to death? Sincerely, Ralph and Susan Larson

Response GP400-1

Comment acknowledged.

GP401, **Leed, Mark**

Comment GP401-1

The DEIS contains a number of invalid assumptions that need to be addressed when completing the final EIS: 1)The economic summary fails to address job losses in the fishing and shellfish industries. 2) The impact to property values of a crude oil train is assumed to be equal to that of freight trains in general.

Response GP401-1

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for an explanation of the basis for the scope of the analysis of potential economic impacts in the Draft EIS.

Comment GP401-2

3) You imply that limiting speed to 25 mph reduces the risk, but it has been shown that tank car ruptures and fires can occur at much lower speeds. 4) It is repeatedly stated that the risk of a serious accident in the extended area is low. We need an actual number based on FRA statistics for BNSF. How many derailment spills can be forecast over a 30-year period? 5) You assume that empty tank car derailments don't cause fires. Fires professionals including the City of Ellensburg's fire chief state that this is inaccurate. 6) You say "Heavier oils . . . do not generate many flammable vapors", but the oil train fires and explosions in Timmens and Gogama Ontario in the late winter of 2015 involved Tar Sands Crude. 7) You assume that in the event of an accident, the responsible parties will be able to pay for damages and do so in a timely manner. Please include numbers supporting this statement.

Response GP401-2

The risk assessment does not distinguish between specific causes of an incident but acknowledges that, in general, slower speeds reduce the likelihood of an incident. Draft EIS Chapter 4, *Environmental Health and Safety,* also notes that the potential impacts would vary depending on the specific circumstances of an incident. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

GP402, **Lenigan, Rosemary**

Comment GP402-1

I back the Audubon Washington point of view. I feel we need more time to explore the dangers to our oceans & rivers & their denizens. Take time to examine other alternatives to improve the economy.

Response GP402-1

Comment acknowledged.

GP403, **Leon, Carmen**

Comment GP403-1

My comments relate to both the Westway and Imperium Draft EISs.
Since "Grays Harbor is an area particularly sensitive to the adverse effects of oil spills," I am against

the proposed oil shipping terminals, oil trains, storage tanks, tankers and barges that would be hazardous to health & safety, our ocean & coastlines, as well as the local economy.

Response GP403-1

Comment acknowledged.

GP404, **Levy, Cindy**

Comment GP404-1

My name is Cindy Levy. I live in rural Thurston County outside of Olympia. And I urge you to deny the permit because this project is insane. The threats to public, health, and livelihood and the threats to wildlife and natural resources are unmitigatable.

As so many people here have already stated in detail the risks, I stand on all of that and I reiterate it. All it takes is one spill. Just one spill over the course of this project to be a major disaster. And the odds of that happening are overwhelming, and we've already seen that.

I would like all of you here to imagine that you are living in Lac-Megantic, Quebec. Just imagine your home is there in the blast zone. Who here wants that? And do you want that on your conscience, to have a project like this to cause that kind of death to people and to devastate the area?

I urge you to take the funds that you're using in this work and invest that in the renewable resources so that we can have long-term health and sustainability for this area for us and for the next set of generations.

As the words of wisdom are, we don't inherit the earth from our ancestors, we borrow it from our children. What are we going to leave them with this? Please deny this project.

Response GP404-1

Comment acknowledged.

GP405, **Levy, Cindy**

Comment GP405-1

It only takes one spill/derailment to create a major catastrophe. We can't afford that. Would you want a rail line transporting this next to your home?

Response GP405-1

Comment acknowledged.

Comment GP405-2

Furthermore, we must focus on developing clean, renewal energy sources. We cannot wait any longer to end our dependence on fossil fuels, with all the risk that entails.

Response GP405-2

Comment acknowledged.

GP406, **Lewis, Twila**

Comment GP406-1

My name is Twila Lewis. I lived in Hoquiam most of my life. Three generations of my family, my father, my brothers, my husband, my brother-in-laws, my nephews have been or are still engaged in commercial fishing. And I think it was out of this that we began learning about keeping our environment safe long before it, I think, even became a word.

And because of this, I was drawn to join the Women League of Voters. We have held several forums and town meetings -- town hall meetings about this problem that we're facing. And we have been told that your scope and Department of Ecology can only cover our own small area.

So I want to say that whatever I say about our area is going to apply to every mile of train track between us and the oil fields. They have not addressed rail safety. They said that they were safe. The very next week there were three derailments. They have not addressed how they -- how the train or oil companies would address helping with disaster. There is no insurance company that would give them insurance to cover disaster, so they should not be able to work in our area.

Response GP406-1

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation. For more information about the analysis of potential impacts on the BNSF main line, refer to the Master Response for the Geographic Scope of the EIS.

GP407, **Liebaum, Ellen**

Comment GP407-1

My name is Ellen Liebaum. I came down here today from Portland, Oregon. Thank you for letting me speak about this Draft EIS and the impact that this project will have on my life and on the life of my four Godchildren, whom I have brought from Westport across through Grays Harbor for the sixth time this summer, since they were old enough to enjoy the drive up.

Your impact statement says that impact fire spills and explosions can be mitigated in a one-day workshop for emergency responders, a one-day hazard awareness training. This is crazy. Your risk

statements say there's a likelihood -- a great likelihood of a small spill. A great likelihood of a medium spill. A large spill versus a small. It just goes up and down, and the potential environmental impact is small for this kind, medium for this. There is no small environmental impact. Any amount of oil spill puts at risk our fisheries, our crab, our tourism, our children's future.

I urge you to look again at what possible mitigation there would be for any more danger to this beautiful river and wonderful Washington.

Thank you.

Response GP407-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

For more information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework.

GP408, **Linn, David**

Comment GP408-1

Westway and Imperium Terminal Services Expansion Projects EISs Comments
November 30, 2015

My wife and I decided to retire in Ocean Shores because of the beauty of the environment and the feeling of closeness to Nature. We oppose the development of oil terminals here because they would most certainly damage our environment and take away much of what we enjoy.

First, I would like to focus on those areas of the report that propose mitigating risks by the use of "best management practices". This mitigation strategy is mentioned frequently and implicitly assumes that "best management practices" will be well-defined and implemented.

I think that that the authors of the DEIS need to keep in mind that all of the companies involved in this process are "for-profit" and "limited liability" entities. What that means for the citizens of Grays Harbor is that these companies will derive most of the benefits from the operations, while the citizens will bear most of the liability. This risk-shifting is not a reasonable outcome. Any uncompensated negative effect is unacceptable.

Since these companies are for profit, they will have every incentive to reduce costs in order to maximize profits. So we can reasonably assume that "best management practices" will not be carried out – they will be simply too expensive. Similarly, the amount of liability insurance carried by these companies will be as little as possible – to maximize profits.

My questions to you are:

What are the Best Management Practices in each case where it the mitigating factor? What are the specific steps in detail and describe how you will ensure their compliance?

Response GP408-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP408-2

What is the Probable Maximum Loss, as defined by the insurance industry, for all affected parties in the community for each stage of the process – transportation by rail, storage in tanks and transportation by water? How does the magnitude of this loss compare to the amount of liability insurance carried by each of the companies involved in the process?

Response GP408-2

Refer to Response to Comment GP408-1.

Comment GP408-3

The DEIS considers only two scenarios: The "Proposed Action" by Westway and Imperium and the "No-Action Alternative". There are many other states of the world and the DEIS should consider the best "Non-Oil Alternative" where the expansions at the terminals would be for the best alternative use with non-hazardous commodities. What are these alternatives and how do they compare to the "Proposed Action"?

Response GP408-3

Refer to the Master Response for Project Objective and Alternatives for an explanation of the alternatives evaluated in the Draft EIS.

Comment GP408-4

Throughout the DEIS there are a number risk analysis tables (e.g. Figure S-1, page S-21, Imperium) that show various scenarios of likelihood and severity of risks. The "slider bars" range from unlikely to likely and low to severe. This is a very imprecise way of gaging risk. What are the numerical results when realistic probabilities of an incident and the expected losses caused by those incidents are calculated? While there may be a large number of possibilities, it is not that difficult to determine an expected value. What is the expected value of the costs of oil spills in all of Grays Harbor by proceeding with the proposed oil terminals?

Response GP408-4

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment GP408-5

As a resident of Ocean Shores, I would like to know why no consideration of the negative effects for Ocean Shores was considered in the DEIS? In the event of an oil spill in the Harbor, what will be the effects on the economy, the environment, the wildlife and the property values in Ocean Shores?

Response GP408-5

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP408-6

In addition to Westway and Imperium, there is a third proposal for an oil terminal in Grays Harbor. Why does the DEIS not consider all three of these proposals together since that will be the actual impact on our communities? Are these reports (Imperium and Westway) examples of "segmentation" analysis, where you can justify each project individually but cannot justify them collectively?

Response GP408-6

Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of the incremental addition of impacts from the proposed action to impacts from past, present, and reasonably foreseeable future actions—including the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project.

Comment GP408-7

While there is some discussion of "Mitigation" in the DEIS, there is no explanation of how this mitigation will be carried out. If a tanker leaks sixteen million gallons of oil into the Harbor, how will it be cleaned up? Can DOE assure us that all of the oil will be removed? What if the spill is Alberta Tar Sands and it sinks to the bottom of the Harbor, how will that be completely removed? How much will this cost and who will pay for it? How many birds and other sea life will be killed?

Response GP408-7

For more information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities.

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP408-8

Section 3.1.15 contemplates a tsunami to occur once every 3,333 years. This is completely at odds with every other finding that tsunamis have occurred every 250 to 500 years in this area. Therefore, your risk assessment is far too low for this type of event. Since the last major tsunami occurred around 1700, the likelihood of one occurring in the next 50 years is quite high. Please revise your analysis to reflect the reality of the situation.

Response GP408-8

The use of the 1 in 3,333-year seismic event is intended to assess the impacts of a large Cascadia Subduction Zone seismic event. While lesser- intensity seismic events generally occur more frequently and can generate tsunamis, the tsunamis would be smaller than the event reviewed as part of this Draft EIS. Refer to the Master Response for Seismic Risk and Design Requirements for a description of the earthquake source model and hydrodynamic modeling method used in the site-specific tsunami analysis conducted for the project site and presented in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis*. Refer to Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

Comment GP408-9

Please examine and discuss the conflicts of interest that may exist among various parties to this report. Specifically, who selected and paid for the authors of the reports that are major portions of the DEIS? Also, do the Port Commissioners and Hoquiam Administrator, Brian Shay have any financial relationships to the oil industry?

How much political pressure has been placed on the Department of Ecology to approve the oil terminals in Grays Harbor? Who has applied such pressure?

The Department of Ecology's mission statement is: "Protect, preserve and enhance Washington's environment for current and future generations."

I ask that you follow you mission statement and deny these permits.

Thank you for your consideration,

David Linn
Ocean Shores, WA

Response GP408-9

Refer to the Master Response for Purpose and Focus the EIS.

GP409, **Linn, David**

Comment GP409-1

Good afternoon. My name is David Linn and I've lived in Ocean Shores for the past seven years. My wife and I decided to retire out here because of the beauty of the environment and the feeling of closeness to nature.

We oppose the development of oil terminals here, because they would most certainly damage our environment and take away much of what we enjoy.

I would like to focus on those areas of the report that propose mitigating risks by the use of best management practices. This mitigation strategy is mentioned frequently and implicitly assumes that best management practices will be well-defined and implemented.

I think that the authors of the DEIS need to keep in mind that all of the companies involved in this process are for-profit and limited liability. What that means for the citizens of Grays Harbor is that these companies will derive most of the benefits from the operations while the citizens will bear most of the liability. This risk-shifting is not a reasonable outcome.

Since these companies are for-profit, they will have every incentive to reduce costs in order to maximize profits. So we can reasonably assume that the best management practices will not be carried out. They will simply be too expensive.

Similarly, the amount of liability insurance carried by these companies will be as little as possible to maximize profits.

My questions to you are: What are the best management practices in each case where it is the mitigating factor? Define the specific steps in detail and describe how you will ensure their compliance.

Response GP409-1

Refer to the Master Response for Mitigation Framework for more information about the development, implementation, and enforcement of mitigation measures.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP409-2

Second, what is the probable maximum loss as defined by the insurance industry for all affected parties in our community for each stage of the process: Transportation by rail, storage, tanks, and transportation by water?

How does the magnitude of this loss compare with the amount of liability insurance carried by each of the companies involved in the process?

Finally, the Department of Ecology mission statement is, Protect, preserve and enhance Washington's environment for current and future generations. I ask that you follow your mission statement and deny these permits. Thank you.

Response GP409-2

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP410, **Linnell, Kathy**

Comment GP410-1

TEXT Please do NOT support this expansion. Our environment is primary and we have spill after spill proof of the ruthlessness of the Oil Companies, regardless of 'what they say' they will do. Thanks for your consideration of my comments

Response GP410-1

Comment acknowledged.

GP411, **Lish, Christopher**

Comment GP411-1

Monday, November 30, 2015

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

Subject: Stop Oil Development in Coastal Habitat -- Westway and Imperium Expansion Projects Draft Environmental Impact Statements

Dear Washington Department of Ecology & City of Hoquiam:

I am writing to urge you to protect Grays Harbor and its people by rejecting the proposed Westway and Imperium oil terminals. The findings in the Draft Environmental Impact Statements for the Westway and Imperium oil terminal proposals in Grays Harbor show that the risks of oil spills cannot be fully mitigated and that the environmental damage to marine habitat, wildlife, and people could be significant. Similar findings exist for waterway contamination, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings. Due to these numerous and enormous risks, I ask that you reject the Westway and Imperium oil terminal proposals.

"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."

-- *Theodore Roosevelt*

Much of what makes Grays Harbor special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters. Grays Harbor communities would take on the risk and oil companies would reap the profits, while Grays Harbor would become a throughway for oil headed elsewhere. There's simply too much risk and too little reward from these proposals.

"Then I say the Earth belongs to each generation during its course, fully and in its own right, no generation can contract debts greater than may be paid during the course of its own existence."

-- *Thomas Jefferson*

Grays Harbor is a site of hemispheric importance to birds. Surrounded by six Important Bird Areas, Grays Harbor is host to hundreds of thousands of resident and migrating birds that rely on this Pacific Coast estuary. Several species protected under the Endangered Species Act are likely to be harmed by these projects, including the marbled murrelet, snowy plover, and streaked horned lark.

"It is our task in our time and in our generation, to hand down undiminished to those who come after us, as was handed down to us by those who went before, the natural wealth and beauty which is ours."

-- *John F. Kennedy*

Recent research by the Washington Department of Fish and Wildlife shows that the Pacific population of the red knot uses the North Bay of Grays Harbor almost exclusively as its one refueling site during its long spring migration from Mexico to breeding grounds in Alaska and beyond. One oil spill could have devastating effects on this species' survival. Furthermore, the cumulative release of toxic chemicals and oil leaks is known to have negative effects on endangered salmon and other small fish upon which birds rely.

"As we peer into society's future, we—you and I, and our government—must avoid the impulse to live only for today, plundering for our own ease and convenience the precious resources of tomorrow. We cannot mortgage the material assets of our grandchildren without risking the loss also of their political

and spiritual heritage. We want democracy to survive for all generations to come, not to become the insolvent phantom of tomorrow."

-- *Dwight D. Eisenhower*

Response GP411-1

Final EIS Chapter 3, Section 3.2, *Air*, has been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analysis predict lower emissions; the updated level of increased risk is not considered significant. Therefore, the Final EIS concludes no potential unavoidable and significant adverse impacts on air quality.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on birds and fish.

Comment GP411-2

The alarming safety record of oil trains means an explosive oil train derailment is not a question of if, but when. As you know in the past three years there have been 11 oil train accidents in North America, including the catastrophic derailment of an oil train in Quebec in 2013 that killed 47 people.

Less dramatic but equally concerning are the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line, from Aberdeen to Chehalis and all the way to the source of the oil in North Dakota and Canada.

"Do not suffer your good nature, when application is made, to say 'Yes' when you should say 'No'. Remember, it is a public not a private cause that is to be injured or benefited by your choice."

-- *George Washington*

Response GP411-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*, which presents a detailed analysis of potential impacts on air quality in the study area related to the proposed action.

Comment GP411-3

There are better ways to meet our energy needs. The State of Washington is rapidly moving away from fossil fuels and toward clean, renewable sources. Building more big infrastructure to transport yesterday's carbon-intensive energy sources is the wrong way to meet today's energy needs, and it's a huge environmental and economic gamble for Grays Harbor. The State of Washington should continue to lead on safe, renewable clean energy solutions and say no to more oil and coal.

"Every man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fish—indeed, all the living creatures of prairie and woodland and seashore—from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement."

-- *Theodore Roosevelt*

I support the protection of Grays Harbor, its marine life, and its people, and I urge you to do everything in your power to stop these dirty and dangerous projects by rejecting the proposed Westway and Imperium oil terminals.

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-- *Aldo Leopold*

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,

Christopher Lish
Olema, CA

Response GP411-3

Refer to the Master Response for Purpose and Need of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP412, **Livella, Therese**

Comment GP412-1

My main concern regarding oil by rail is the source of the oil. Weather it be fracked oil from the Bakken oil fields or tar sands oil from Canada, I am vehemently opposed to extracting these volatile substances. I am pretty well versed on many of the issues regarding public safety and water quality.

But when I came across the air quality statistics (or lack there of) in this DEIS, I truly could not believe what I was reading. The DEIS consistently uses low estimates on the amount of crude transported both by rail and by vessel.

Response GP412-1

The Draft EIS analysis assumes transport of the at maximum annual throughput of crude oil under proposed action.

Comment GP412-2

The impact statement downplays the health and safety risk to entire populations along the Columbia River. This is accomplished by only addressing spills, explosions and fires along the PS&P rail way. Populations along the BNSF railway all the way from Spokane to Vancouver up to Longview were not counted as affected areas. I work in both Vancouver and Longview.

Response GP412-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Comment GP412-3

In addition, buried within this DEIS there are plans to build a holding space for trains in Woodland to accommodate the increased rail traffic. My assumption is that these 'trains in waiting' would be idling; causing additional air pollution that was not addressed.

Response GP412-3

The Woodland holding facility, referred to by the commenter, is a planned BNSF capacity enhancement project that is not dependent on the proposed action and would occur under the no-action alternative.

Comment GP412-4

Intentionally, Canadian oil was not included in the assessment, because it is reportedly a small percentage of oil coming through Washington now. But Canadian oil IS coming through now and will CONTINUE in the future, so what are you trying to hide? That is one heck of an omission in the face of the Trans Pacific Partnership trade deal that just received national attention this week.

Response GP412-4

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Mod*eling, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections

4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Comment GP412-5

On page 6-11 table 6.4 indicates that the combined projects will cause an annual increase in rail way green house gas emissions of nearly 8%. That statistic is then minimized by comparing it to project site operation emissions, which only show an increase of less that 1%. Shamefully, the document goes on to state that this is only .00003% of world wide emissions. Do you really think that communities along the BNSF rail way care what the global average is when their exposure is going up so dramatically? Furthermore, I studied that table of numbers for quite a long time and could not recreate the math. That data is sketchy at best.

Response GP412-5

Because greenhouse gas emissions contribute to global climate change, the Draft EIS presents emissions related to operation of the proposed action and offsite transport of crude oil to and from the project site in the context of state, national, and global emissions and reduction targets.

Comment GP412-6

Page 6-8 states that per the Washington Department of Ecology, the air quality assessment in this DEIS is not taking into account the amount of diesel particulate matter because "this regulation only applies to stationary sources, not mobile sources such as rail locomotives. There are no local or state regulations for DPM emissions from mobile sources." This would have been a good place to add research from other state or global sources. Take responsibility for the health and well being of the individuals who pay your salary. We are not numbers or percentage points. We are people who live and work, play and learn near the BNSF rail lines. And we want a real, thorough, and accurate assessment of our air quality risks. Leaving BNSF rail analysis out of the DEIS reduces your air quality face sheets to mere tax payer funded propaganda. In closing, I have one more fact that should go into the public record. On Monday, October 5, I received an invitation from the Washington Environmental Council to participate in the Washington Department of Ecologies public education meeting regarding the Clean Air Rule, currently under development. Would anyone like to guess when that meeting is? It is tonight, October 8 from 6-8 PM. While I do appreciate the invitation, do you think you could coordinate your efforts a bit? Maybe be present at this event and actually LISTEN to the concerns of Washington residents.

Response GP412-6

As stated in Draft EIS Chapter 3, Section 3.2, *Air*, although regulations do not apply to mobile sources such as rail locomotives, an analysis of cancer risk from emissions of diesel particulate matter specific to rail transport related to the proposed action was completed for and presented in the Draft EIS. Draft EIS Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant.

Refer to Response to Comment GP412-2 regarding the analysis of impacts along the BNSF rail line.

Comment GP412-7

Even if the oil doesn't catch fire, there are plenty of other dangers from spills. There are air emissions of possibly toxic chemicals, and there are effects on ground water. Contaminants associated with crude oil include pyridine, picoline, and quinoline. These compounds have a very high water solubility, so they would dissolve with any water in the earth, and would move readily to wherever that water is going. Eventually they would contaminate ground water, including the region's aquifer. Damage could be severe and perhaps permanent. There is even a danger in monitoring the amount of volatile gases the cars contain. People have died from trying to monitor gases in their trucks. Some of the explosions happened when trains were going as slow as 33 mph. They could be forced to go even slower, but that is obviously going to impact the communities they go through, making their city streets unavailable for even longer periods of time. As it is, the trains planned to go through those communities will make emergency response unacceptably slow, and will drive down property values on all the affected streets. Please do not allow crude oil from the Bakken fields to pass through Washington State communities on trains. It's too dangerous in the case of a spill, and spills are too difficult to prevent.

Response GP412-7

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP413, **Livella, Therese**

Comment GP413-1

This is from the state of Indiana's web site on pollution prevention. In a previous comment I noted that Washington does not have any state regulations regarding diesel particulate matter. It's about time for that to change. Until those regulations can be made, the permits for Gray's Harbor projects should be denied. Myth: Diesel exhaust doesn't hurt anyone. - Fact: Diesel exhaust contains several chemicals and compounds that may be detrimental to human health. The health effects of diesel exhaust are both acute, from short-term exposure, and chronic, from long-term or repeated exposure. Specific health risks and their severity depend upon the amount of chemical that you are exposed to as well as the duration of the exposure. - An acute exposure to diesel exhaust could cause an irritation of the eyes, nose, throat, and lungs as well as lightheadedness. Chronic exposure to diesel exhaust can have several more severe effects on human health. Chronic exposure is likely to occur when a person works in a field where diesel fuel is used regularly or has repeated exposure to diesel fumes over a long period of time. Human health studies demonstrate a correlation between exposure to diesel exhaust and increased lung cancer rates in occupational settings. Experimental

animal inhalation studies of chronic exposure to diesel exhaust have shown that a range of doses cause varying levels of inflammation and cellular changes in the lungs. Human and laboratory studies have also provided considerable evidence that diesel exhaust is a likely carcinogen. • Please visit the IDEM DieselWise Health Effects Page for more information about the health effects of diesel exhaust. • And here is an excerpt from the IDEM Diesel Wise Health Effects Page. • Who Is At Risk? Individuals may react differently to the same type of exposure. The more sensitive portion of the population is likely to have a stronger reaction than the average healthy person. Children, the elderly, and people with cardiovascular or lung disease, such as emphysema and asthma tend to be more vulnerable to exposure. Who will pay for the increases in health care costs for these individuals? The Imperium DEIS clearly states that the populations along the BNSF rail line were not studied at all. The increase in tax payer funded health care costs needs to be considered. And you need to look each of those residents in the eye and tell them they do not matter. Is the Department of Ecology ready to do that? The more cost effective and morally responsible plan would be to deny the permits for these dirty projects. I have attached a copy of the word document so that you can access the link sited above.

Response GP413-1

As stated in Draft EIS Chapter 3, Section 3.2, *Air*, although regulations do not apply to mobile sources such as rail locomotives, an analysis of cancer risk from emissions of diesel particulate matter specific to rail transport related to the proposed action was completed for and presented in the Draft EIS. Draft EIS Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant.

GP414, **Livella, Therese**

Comment GP414-1

This comment has more to do with how the entire Gray's Harbor process has been conducted. I got involved with the Gray's Harbor project when the DEIS came out. Upon reading it, I am outraged that my communities are not included in the study when oil trains will clearly have an impact on our lives. While I may not live near the BNSF rail lines, I spend 8-12 hours a day working in areas that are near them. And I frequent many businesses along the tracks in Vancouver, Woodland and Longview. I have already stopped traveling Amtrak until this oil train nonsense is stopped. How much revenue will local businesses have to loose before they pull out and move elsewhere? I gave public testimony in Aberdeen and I was sorely disappointed in the 2 minute time limit. While I understand your intention was to allow more people the time to speak, it is customary to give 3 minutes. 2 minutes is not enough time to complete a thought. I put a lot of time into making sure my comments would fit into the usual 3 minutes. If you want to give more people the opportunity to speak, have more hearings. I drove all the way from La Center to look you in the eye and make sure that my comments were recorded. When I arrived in Aberdeen I was really excited to go to the open house. However, after seeing that it was just a bunch of slick advertising my stomach turned. Taxpayer funded propaganda is what we got out of this DEIS. It is an incomplete study that taxpayers will continue to pay for, as you read through our comments and prepare a "full" EIS. But

you better believe we the people will be back, spending thousands more volunteer hours to make sure you have done your home work. And finally, I would like to address the way in which you have organized the DEIS document. It sends the reader round and round in loops of frustration trying to get to the point of the research. After a while I realized there is no meat to this DEIS.. Statistics are from other studies but do not really have any bearing on this project. I mostly read the Imperium project because it is the larger of the two. I felt as if I was playing a shell game in Las Vegas. Two years ago I relocated to Southwest Washington from the Midwest. Upon my arrival I heard good things about the Department of Ecology. How the DOE is progressive and moving Washington in the right direction. Well, with documents and slick advertising schemes like this, public opinion may be about to change. I have often found myself wondering why the public is not more actively involved in huge projects like this. I am beginning to understand the vast amount of time it takes to unravel all the treads our government weaves. How does one stop a raging oil train? You read the full documents and you talk to your neighbors. Next time we meet I will introduce you.

Response GP414-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

The time limit for public testimony in the main room was established to allow the greatest number of people to speak given the large turnout. Numerous other opportunities to comment were also available, including the opportunities to provide oral testimony to court reporters in semiprivate areas at the open house and to provide written comments in various formats.

GP415, **Livella, Therese**

Comment GP415-1

I can only assume that the person or persons creating this DEIS ran out of time to study train movement because the document contradicts its self so many times. Here are a few examples. Page 3.0-2 states, “Although the applicant does not have control over offsite transport, implementation of the proposed action would generate rail and vessel trips that could result in environmental impacts along the transportation corridors. For example, increased rail and vessel trips could lead to congestion and related traffic delays, increased noise, and increased air emissions. The transportation corridors that would be affected by offsite transport would vary depending on the commodity being transported, the source of the commodity, and the final destination for delivery.” Based on this lack of information, it was decided only the PS&P rail line would be considered for this study. But alas, if one keeps reading it is stated on page 5-27 “BNSF will likely continue to use the Columbia River Gorge route for loaded oil trains. Empty cars could be transported east via the Stampede Pass or the Columbia River Gorge routes.” So the movement is somewhat predictable, you just elected not to study it.

Page 3.15-28 “Although rail traffic impacts are considered to be low, to further improve safety along the PS&P rail line, PS&P should consider designating a position to plan and coordinate emergency response plans and lead implementation of community awareness programs such as Operation Lifesaver and a See Something Say Something program. Chapter 4, Environmental Health and Safety,

further addresses rail safety mitigation measures". Why are these programs needed for PS&P and not for BNSF? Maybe it is because BNSF is a partner for the Washington Operation Lifesaver program already. I would be interested to know how much money they have contributed to the program. Furthermore, I am interested to know why public education programs focus on how to prevent a train derailment but do nothing to inform the public regarding the dangerous substances transported by rail. My eyes have truly been opened by following this oil by rail issue. Gradually, the public is getting the real education they deserve.

Page 3.15-28 asks, "Would the proposed action have unavoidable and significant adverse impacts on rail traffic? The answer: There would be no unavoidable and significant impacts. Mitigation to address vehicle traffic and safety delay from increased rail traffic is addressed in Section 3.16, Vehicle Traffic and Safety." Once again, this DEIS is limited in its scope. The crude oil does not magically appear on PS&P's doorstep. This document only looks at traffic delays along the PS&P line. Because I am not familiar with the area of impact studied, my comments will focus on the areas I know. Many thousands of people will be impacted in communities such as Spokane, Vancouver, Longview and Woodland. Where are the studies for those areas? Who will pay for upgrades to those crossings? I am aware of at least one major crossing in Longview that would be affected. I believe that study has already been done at taxpayer expense for a different project. It involved replacing or building a bridge. A project that would have cost millions. No wonder this DEIS is limited in scope. The public has already blown the whistle on that tax payer funded bridge. Deny any permit requests for the Westway and Imperium Expansion Projects.

Response GP415-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

GP416, **Livella, Therese**

Comment GP416-1

Hello, my name is Therese Livella, and I'm a resident of Clark County. The DEIS's consistent use of low estimate amount of crude transported by rail and by vessel, the impact statement does not list the health and safety risks of an entire population along the Columbia River. This is accomplished by only spills, explosions and fire along the PS&P Railways.

The population along the BNSF railway all the way to Vancouver, up to Longview were not counted as affected areas. I work in both Vancouver and Longview, so this does affect me.

Response GP416-1

The Draft EIS analysis assumes transport of the maximum annual throughput of crude oil under proposed action.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Comment GP416-2

In addition, buried within the DEIS there are plans to build a holding space for trains in Woodland to accommodate increased rail traffic. These trains simply would be idling creating air pollution which was not addressed.

Response GP416-2

The Woodland holding facility is a planned BNSF capacity enhancement project anticipated to occur under the no-action alternative.

Comment GP416-3

Intentionally Canadian oil was not included in this assessment because of reportedly a small percentage of oil coming through Washington now. But Canadian oil is coming through and will continue to in the future.

That is one heck of an omission in the face of a Transpacific Partnership Trade Agreement that received national attention this week.

Response GP416-3

Refer to Response to Comment GP412-12

Comment GP416-4

On pages 6-11, Table 6.4 indicates that the combined projects will cause an annual increase in railway greenhouse gas emission of nearly eight percent. That statistic is minimized by comparing it to project site operation emission, which only show an increase of less than one percent.

Shamefully the document goes on to say this is only .00003 percent of world wide emissions. Do you think that committees along the BNSF Railway care what global averages are? Furthermore, I studied that table for quite a long time and could not recreate the math. That data is sketchy at best.

Thank you.

Response GP416-4

Refer to Response to Comment GP412-15.

GP417, **Longley, A**

Comment GP417-1

The proposed expansions of Westway and Imperium Terminals have many potential adverse environmental effects that must be considered in this EIS. I would just like to point out that in addition to the more local environmental dangers, which are quite serious, both proposed terminal expansions would significantly increase availability and subsequent use of fossil fuels at a time when it is imperative that we all (businesses, individuals, and government agencies) do everything reasonably possible to minimize global climate change. Please consider all of the potential adverse effects of these proposals in your EIS process. Thank you, A Longley, PhD

Response GP417-1

Comment acknowledged.

GP418, **Lucas, Betty**

Comment GP418-1

My comments relate to both the Westway and Imperium Draft EISs. I urge the City of Hoquiam and the WA Dept of Ecology to address:

* The adverse effects on the environment of Grays Harbor

* The health & safety of residents, the impact on the local economy & risk to oceans & coastlines from the crude oil terminals

A major oil spill could devastate the marine life and local jobs & businesses. Oil trains are dirty, and dangerous there has been significant loss of life and devastation from explosions & derailments in recent months/years.

WA state is making progress in more clean & renewable energy sources. Let's not support these dangerous oil trains.

Response GP418-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP419, **Luck, Vickie**

Comment GP419-1

I am for both

Response GP419-1

Comment acknowledged.

GP420, **Lybarger, Lisa**

Comment GP420-1

We do not want more or any oil trains running along the Columbia river!

Response GP420-1

Comment acknowledged.

GP421, **Lyons, Mary**

Comment GP421-1

Thank you for having the hearing. My name is Mary Lyons. I'm a board member of Landowners and Citizens For a Safe Community out of Longview, Washington. As a volunteer coordinator, I work with all kinds of people who are working very hard to support this state economically and environmentally.

The exclusion of the communities along the train route between the Dakotas—North Dakota and Aberdeen, is a real short-sighted vision of what is an environment. It's the old-fashioned picture of an environment is the immediate space around which you can breathe.

Now, I know you're talking about in your study in this EIS you're studying the tracks from—or the train travel from the I-5 basically to here. And it's bizarre for me as a member of a community that's going to be really hard to pay our taxes to the state and to uphold some of the amazing leadership of this state that we're being excluded from this study. With more than 1,000 bomb trains a year going through our community that we're not being considered in this, flaws the study itself.

So if this is not the ecology of our community, what is the ecology? Whose ecology department are you, if you're not ours? What state are you, if you're not ours? And, so, as a community we are appealing and we're urging you to deny this permit based upon the study and impact of the explosive nature of these trains.

Thank you.

Response GP421-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

GP422, **MacLeod, Paul**

Comment GP422-1

Comments submitted to the Dept. of Ecology 10/8/15
Submitted by:
Paul MacLeod
2115 Aberdeen Avenue
Hoquiam, WA 98550-4035
(360) 533-5911

Re: Port of Grays Harbor's two proposed oil projects

1) According to Draft Environmental Impact Statements in Volume 1, Chapter 4 there are **NO** mitigation measures that can be implemented that would totally eliminate the possibility of a large spill, fire or explosion. These would have a huge impact on ground and surface water, plants, animals, aesthetics, recreation, cultural resources, tribal resources, human health and the quality of life for all residents of Grays Harbor County and beyond. Why would the Dept. of Ecology even consider granting permission for these projects when these risks exist?

Response GP422-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP422-2

2) Let us view this as a scenario where a bank makes a loan to buy a house, but in this case the residents here would be making a loan of their environment to the oil companies to transport their products using railroad company facilities. It has been made public that the insurance coverage which would be in effect, should some catastrophe occur, will only cover up to a maximum of about 40% of the damage. A bank would **NOT** make a loan if their collateral was not fully insured. For the Dept. of Ecology (which is here to protect our environment) to give their approval to these projects, in my opinion, would be a gross violation of their responsibility to us, the citizens of Grays Harbor County and beyond.

I am expecting these two concerns to be fully addressed in the Final Environmental Impact Statement and to be notified when this has been done.

Response GP422-2

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP423, **MacLeod, Paul**

Comment GP423-1

My name is Paul MacLeod. I'm a retired treasurer of a local bank. I submitted a hard copy of this with my address and phone number on it. I have two items I'd like to address. According to the DEIS statement, Volume I, chapter 4, there is no mitigation measures that can be implemented that would totally eliminate the possibility of a large spill, fire, or explosion. These would have a huge impact on ground and surface water, plants, animals, aesthetics, recreation, cultural resources, tribal resources, human health, and quality of life for all residents of Grays Harbor County and beyond.

Why is the Department of Ecology considering granting permission for these projects when these risks exist? That's one question.

Response GP423-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP423-2

My second, let's view this as a scenario where a bank makes a loan to buy a house, but in this case the residents here would be making available the bulk of our environment to the oil companies to transport their products to using the oil companies' facilities.

It has been made public that insurance coverage, which would be in effect should some catastrophe, will only cover up to a maximum 40 percent of the damage. A bank would not make a loan if their collateral was not fully insured.

For the Department of Ecology, which is here to protect our environment, to give their approval to these projects in my opinion would be a gross violation of the responsibility to us, the citizens of Grays Harbor and beyond. I'm expecting these two concerns to be fully addressed in the final EIS, and to be notified and addressed.

Thank you.

Response GP423-2

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP424, **Majar, Mary Ann**

Comment GP424-1

I strongly oppose shipping crude oil from the Port of Grays Harbor. The environmental risks so close to places like the Gateway Mall, an active fishery, and the National Bird Sanctuary does not make sense. The threat to our estuary, beaches, fishery, shore birds, and the local economy is simply not worth the risks involved for encouraging the extraction and shipment of bakken crude or other fossil fuels. Bio diesel is already shipped from our port and presents too great of a risk already given the seismic nature and sensitivity of this area. Please deny permits to move forward with these projects.

Response GP424-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP425, **Mallard, Tom**

Comment GP425-1

A key issue to me is tsunami-safe oil & gas tank storage, regardless of where along the coast, and in Puget Sound north to the Inside Passage. Studying simulations of when the M9 plate-boundary earthquake hits and a single release noting the 2011 was a series of 5 releases. The water shoved into the Straits of Juan de Fuca or up any bay, estuary or river will continue flowing in for 2-3 hours from the lessons of March 11, 2011, the Straits take a full hour for the leading edge to get to where the sound starts since it's shallow and narrow. With multiple releases it triples that inflow time to fill the entire inland waterway with 10m up to 50ft above sea-level. This town Kesennuma is placed in a flooded bay very similar to Puget Sound, it was the largest fishing city in the country and 1/3 of industry was destroyed by the fires that survived the tsunami as structures. There were 7 tsunamis in Kesennuma, the 5 major shocks within minutes along the plate a reason damage was so bad and for multiple tsunamis that don't drain for over a day, this happened at other harbors. The 2007 NOAA simulation of a local M7.3 shows Harbor Island's tanks gone and that spread SE along the waterfront, the debris prevents these fires from being put out easily, with city damage resources are

few, infrastructure damaged or gone, a vignette in the video. On the Columbia River tanks are just sitting ducks, their plan to move them is 50-years and sea-level rise is adding plate-boundary stress, having the Japan release allowed the Pacific Plate to move over ten meters & it accelerated, earthquake activity jumped after that release and has not fallen off much, a M7 occurred two weeks ago near Fukushima. All this creates a "tension" wave tectonically for our end of the Pacific Plate that will encourage a release when it arrives, takes about 3-5 years it's not a long-term situation now ... odds are sooner than later. This is a good summary video of exactly what will happen, how surge height goes a lot higher in confined bays, tanks floating by, the fires started late the first night: 17:03; youtube.com/watch?v=6xOFNgpLzVE Force the tanks be moved by demanding insurance, liability for any deaths due to fires from their products & specialty fire-fighting equipment that works after a tsunami, they have no right to risk the damage without insuring losses on the table with fire-fighting crews trained & equipment in place. Otherwise disallow any more fuel to be put in them and when empty remove them, don't wait for them to do it if you love the people affected, just pay for it wisdom. A mayor of one fishing village held out for a 20m wall, it saved their village. Finally, I have design work on using transducers on the bottom miles at sea to reduce surge height, an automatic system, there is no way to save as many lives per dollar and it applies to any risk area on the planet.

[Tsunami diagram reviewed but not reproduced.]

Response GP425-1

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Earthquakes and Related Hazards*, describes the potential impacts on the proposed facility in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

GP426, **Mann, Cherri**

Comment GP426-1

I'm Cherri Mann from Port Townsend, and I am speaking in care (inaudible). Thank you for the opportunity to speak before you today. I do value your time.

But I would like to talk about justice for our planet and for the people who share our resources. Clean air, water, and energy sources, and sustainability for these resources is an important job when you consider this proposal.

I grew up in Longview, Washington along the Columbia River and it is a very sacred river to me. When you consider this proposal, there is a new paradigm ship out there. We must include local, regional, national, and now global effects resulting from our decision-making policies.

I want to address the most important concern, that is a train wreck that would create an aftermath costing possible lives and devastation to wildlife. But I will leave those details to the scientists who do report to. But here are my grave concerns. I'm going really fast.

The outdated transportation system and the infrastructure of our railroad system, I'm concerned about the lack of transparency dealing with the routes, number of cars, contaminants carried on

them, how can we adequately provide vital and emergency services to potential explosions, derailments. Furthermore, who is going to pay for this?

The Seattle Times right here, and I encourage all of you to get it, it has a story, and the story is this. Just a couple weeks ago, Oil Trains Surge Raises Risks; Patchwork Preparedness in U.S. Cities Survey Finds. And I don't know if you have a copy of that but I'd be happy to provide that.

Second concern. Really, the Columbia Gorge -- is that it?

Response GP426-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP427, **Mann, Cherri (350.ORG)**

Comment GP427-1

RECEIVED OCT 1 2015

Cherri L. Mann

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Port Townsend,

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October 1, 2015

Thank you for this opportunity to speak about this very important proposal before us today. Last week I attended the Moral Action on Climate Change events held in Washington D.C. in support of the Pope's visit and his comments dealing with the moral issues facing everyone on this planet dealing with climate change and the rising temperatures. We need and we will shift our paradigm in regards to how we look at fossil fuels. More specifically, we need to look at the decision-making model that includes both environmental justice and social justice components. Yes, justice for our planet and for the people who share our resources...clean air, water, energy sources, food . . . sustainability of these resources and yes, jobs.

I grew up in Longview, Washington...on the banks of the Mighty Columbia River! The river is sacred to me...knowing its importance in our region! It is a place where we had church and school

picnics...my father fished there...smelt came up the Columbia into the Cowlitz River...I learned to water ski during high school off the sandy shores ...and yes, it was a place for naughty teens to have fun, innocent parties!

And, yes, it created jobs for our local economy. I totally understand the urgency and potential opportunity for the Gray's Harbor community to embrace and welcome 84 new jobs ...I understand that! My father was an iron worker and his jobs were building dams, bridges...jobs are essential to communities. BUT...

When you consider this proposal, in this new paradigm shift, we must include local, regional, national and global affects resulting from our decision-making policies.

I want to address the most important concern I have which is shared with anyone living along the Columbia River. What if...yes, I could list all the train wrecks with lethal contaminants that have cost millions in correcting the results in the aftermath...or the cost of human lives and devastation to wildlife but I will leave this to the scientific reports.

Here are my grave concerns:

The outdated transportation system, infrastructure of our railroad system. I am concerned about the lack of "transparency" dealing with the routes, number of cars, what contaminants are carried in them. How can we adequately provide vital emergency services to potential explosions? Derailments...furthermore, who is going to pay for this? The Seattle Times recently had an article about this very concern. Enough is enough…we need to put a moratorium on the number of contaminants (coal and oil...and other deadly cargo) until we get a handle on public safety.

Response GP427-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Final EIS Chapter 4, Environmental Health and Safety, has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures proposed to reduce risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

The approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, Environmental Health and Safety, this is because a

spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations (refer to the Master Response for Risk Assessment Methods) and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill. Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* reflects additional information on the economic and social costs of oil spills. This includes information on derailments and other accidents involving trains carrying crude oil and information on a crude oil spill during marine transport.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP427-2

Second Concern: Really, really...The Columbia Gorge Scenic Byway!!!! Scenic means tourism, it means something special, something we must take care of in order to fully enjoy. What about those salmon runs! One spill could cost millions in years of lost salmon. I envision a salmon trying to make its way up the fish ladder after a spill. Of course, we all know that our river and its fish and wildlife would be dead. No, we will fight to keep the Columbia Gorge free from this proposal...the largest proposal for a terminal in the US.!!!! Twenty-five million gallons of Bakken crude oil...???

You must take into consideration the impact of sending crude oil through our states only to be a financial gain for industry seeking to make a profit off of our natural resource...the Columbia River! The daily threat is incomprehensible! Unimaginable!

Response GP427-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Comment GP427-3

I want to remind you that our Native Nations...The Quinault, Makah, the Warm Springs, Celilo (sea-lie-low) Falls, Yakima Nation, Umatilla Nation...our sovereign peoples who have under our US constitution the right to their lands and resources. Under the Boldt decision, they have fishing rights which are the bases of their economy.

Response GP427-3

Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, addresses potential impacts on tribal resources from construction and routine operation of the proposed action. Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, identifies potential impacts on tribal resources from oil spills, fires, and explosions.

Comment GP427-4

And private investors who have nothing to do with the health of our natural resources here in the Pacific NW, want to build the largest oil export on the Columbia River and the largest coal terminal

at Cherry Point on ancestral lands of the Lummi Nation...changing our states forever!? Toxic materials going to Asia where increased gas house emissions will continue to rise...causing catastrophic consequences world wide - creating both environmental and social injustices locally, regionally, nationally and globally.

I stand in total support and solidarity with our Native Peoples and their desire to take only what they need to survive and to respect "Mother Earth". Our white European ancestry of consumption must include giving up our dependence on fossil fuels.

Response GP427-4

Refer to the Master Response for Purpose and Focus of the EIS.

Comment GP427-5

What about our small communities along the pathway of increased shipments of crude oil...toxic, deadly. Noise pollution, traffic interruption, and possible spills. There is a small town in Washington along the Salish Sea, Bow, Washington. Its residents have for years and years fought to have the train whistles that sound off at four, train crossings, creating 200 blasts every day! They are in litigation...and now are faced with spending tens of thousands of their own money in order to mitigate the effects of increased number of trains...are there no limits? Are communities taken into consideration?

Response GP427-5

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Comment GP427-6

In the mid-80's there was an oil spill in Port Angeles. Anyone in making decisions about crude oil should be made to go to these sites of disaster to clean up birds! There are no words to describe walking into the makeshift local high school, with experts flown in...transportation costs out of their pocket...to help guide through the process of trying to clean up the waterfowl. So many died...our birds, salmon, wildlife...they don't cope with these dangers. They just die...

I truly believe that the Pope's message to congress and to the United Nations is the start of global conversation starting with the sentence, "Will this decision greatly impact the continuance and reliance on fossil fuels and is it necessary...and will environmental and social justice be served and embraced locally, regionally, nationally and globally? The range of criteria for making critical decisions has grown exponentially as well as the possible results, consequences of those decisions.

Again, personal financial gain for private enterprise and 84 jobs do not in any way offset the thousands of negative consequences. Do not let this go forward!!!

Response GP427-6

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. This includes the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. However, as noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

GP428, **Marks, Griffith**

Comment GP428-1

Hello, my name is Griffin Marks, and I'm a resident of Central Park, and at my house, we can walk down to the tracks, and it doesn't take very long, and we see how fast the trains go even though they say they're not going that fast, and it scares me that one will eventually crash, but making -- but doing oil trains like this, I believe is not fair for many people because I love to fish. And pretty soon we're going to start trapping as well as a side business, and I believe that it could destroy huge fish populations and destroy jobs for commercial fishermen, crabbers, and charter boat captains.

And, therefore, this is taking away many more of the jobs that they are trying to make people believe they will give.

And also I believe that for professional hunters and trappers, it would be terrible for their business, and then they would be forced to find other jobs, and they will find difficulty trying to supply food and money to their families.

And lastly, other kids who I am trying to get to learn how amazing fishing is will not be able to learn and will not be -- and then not very many people will be able to have fun and then we will have to buy our salmon for even more expensive than it already is. Thank you. Griffin Marks, ten years old.

Response GP428-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. This includes the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. However, as noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7,

Impacts on Resources, describes the types of impacts that could result from an oil spill, fire, or explosion.

GP429, **Maron-Oliver, Dani**

Comment GP429-1

Name: Dani Maron-Oliver
Organization: Longview Land Owner. Citizen for a Safe Community
City/ State/ Zip: Longview, WA 98632

Crude oil delivered by train, transported by sea stored in a very dangerous commodity. Oil spills. Resultant fires & explosions are a scary health hazard to all who live along rail areas, which are extensive for WA all along the railways. Emergency health personnel are not even trained in providing assistance to those injured in the most horrible way by fire & burning oil.

Trains are still unsafe. Tracks are way below safe standards sea vessels can have too often spilled in waterways esp. the Columbia River polluting the rivers killing fish preventing recreation (least but still important)

Pollution the rivers killing fish preventing recreation (least but still important).

I am an RN & have personally seen the effects of horribly burned people.

The fuels also prevent a hazard to the air & cause or exacerbate respiratory problems for all, but especially the very young & the elderly.

I implore you to consider safer, cleaner increases of job worthy sources of energy such as solar wind and wind turbines.

Response GP429-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. This includes the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. However, as noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

GP430, **Marthaller, John**

Comment GP430-1

Considering the economic impact of oil development in North Dakotas Bakken; I think the oil storage facilities should be expanded as requested. The economic benefits of the Bakken have

spread from Coast to Coast across America. It should not be blocked from the citizens of Washington State because of the wishes of a loud minority who wants to push civilization back to the pre-fire days.

Response GP430-1

Comment acknowledged.

GP431, **Martin, Arnie**

Comment GP431-1

Quoting from the Vancouver Hearing Examiner's decision of 6 Oct 2015 on the Proposed NuStar project, page 26 of 31

WAC 197-11-794, Significant

(1) "Significant" as used in SEPA means a reasonable likelihood of more than a moderate adverse impact on environmental quality.

(2) Significance involves context and intensity (WAC 197-11-330) and does not lend itself to a formula or quantifiable test. The context may vary with the physical setting. Intensity depends on the magnitude and duration of an impact.

The severity of an impact should be weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred.

(3) WAC 197-11-330 specifies a process, including criteria and procedures, for determining whether a proposal is likely to have a significant adverse environmental impact.

End of quote.

Mr. Shay, there are many statements of significance in these DEIS documents. Exercise your authority under this legal interpretation, and deny all permits for these projects.

Arnie Martin
631 Chenault Ave
Hoquiam, WA 98550

Response GP431-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP432, **Martin, Arnie**

Comment GP432-1

(S-7) Greenhouse Gases

It is totally deceptive to include the percentage of the Washington State 2050 Greenhouse Gas target generated during the rail transport of the crude oil from Centralia to Hoquiam, and in the vessel transport from Hoquiam to the 3-mile limit. This is a striking example of how self-serving these DEIS's are. If the GreenHouse Gas resulting from combustion is not factored in, at least showing the total transportation GHG's would be slightly more factual.

Response GP432-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

GP433, **Martin, Arnie**

Comment GP433-1

Soil Liquefaction Imperium DEIS section 2.1.4.1

This section states that the piles supporting each of the tanks will be driven 75 feet into the 120 foot deep unconsolidated dredge spoils, and then filled with grout. When unconsolidated soils are shaken, soil liquefaction will occur, and the shaking will be magnified due to resonance.

I would like to remind you that the site is approximately 50 miles from the Cascadia Subduction zone. In the event of a complete full fault rupture, the length of time that the earth would shake can be estimated from the 1964 Alaskan Good Friday quake - approximately 4 minutes.

The designs for the Imperium tank supports are to be similar to the supports for their existing smaller and shorter biodiesel tanks. Placing 26 million pounds of tank, tank pad, and crude oil on top of many 75 foot long pilings (columns) which require lateral support from the soil when the tank is being flung from side to side, on a site where the soil will liquefy during a major quake, it does not seem like you have chosen your site properly.

Similar numbers for the Westway tanks, with approximately 54 million pounds of tank, tank pad, and crude oil on top of pilings extending 120 feet above the consolidated sediments, also seems like a poor choice of site to minimize earthquake damage.

Aside from removing the dredge spoils and replacing them with packed soil, there is no way to lessen the liquefaction potential of these sites. Of course you might try freezing the soil under the tanks, and keeping it frozen for the next 40 years. I suggest that not building these projects would be the proper solution.

Arnie Martin
631 Chenault Ave.
Hoquiam, WA 98550

Response GP433-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

GP434, **Martin, Arnie**

Comment GP434-1

Arnie Martin, Hoquiam, Washington, Grays Harbor County. My comments pertain to both Westway and Imperium. I am a resident of Hoquiam and volunteer at the Grays Harbor National Wildlife Refuge, leading school children to Bowerman Basin to see the amazing annual migration of shorebirds. The mud flats of the basin are a major feeding stop for fuel on the final leg of their journey to their breeding grounds in the arctic.

We try to stage the trips at the best viewing times relative to the high and low tides, but sometimes the basin is totally flooded. Other times hundreds of acres of mud flats are exposed and you can see the birds madly feeding.

I am commenting on the Volume 3, Appendix N, Oil Spill modeling using NOAA's GNOME program. You consider varying oil spill sizes, river flow rates, and wind directions to predict the spill path and the location where a spill would meet the shoreline. The model does not, however, use the changing levels as a factor.

The tidal draining and filling of the basin acts like a pump. The rising tides would bring spilled oil into the basin, oiling the entire mud flat, not just the shoreline depicted in the study. The Geographic Response Plan's proposed booming of the basin proposed anchoring the boom using the former rail pilings, however that is impossible as the pilings are rotted.

The refuge cannot be restored if it is oiled. The shorebirds would not be able to complete their migration to their Alaskan breeding grounds without their food from the mud flats. There would be no new birds.

I strongly urge you to reject these proposals since there is nothing that can prevent oiling of the mud flats in the event of a spill. It's not an oil skimming basin, it's a Federal Wildlife Refuge. Thank you.

Response GP434-1

The Northwest Area Contingency Plan and geographic response plans are maintained by Washington State Department of Ecology. Comments on these plans can be submitted at this website: www.rrt10nwac.com/comment/default.aspx. It is outside the scope of this Draft EIS to update these plans.

Draft EIS Chapter 4, Section 4.7, Impacts on Resources, discusses impacts on avian species and other animals from oil spills, fires, and explosions.

Refer to the Master Response for Oil Spill Modeling Methods. Plants and Animals; Oil Spills, Fires, and Explosions.

GP435, **Martin, Arnie**

Comment GP435-1

Again, my name is Arnie Martin. I live in Hoquiam. My comment relates to both projects, Oil Spill Financial Responsibility, Section 4.4.3.1. That section states, and I quote, Prior to beginning the proposed operations, the applicant will conduct a study to identify appropriate level of financial responsibility for the potential cost for responsive clean-up of oil spills, natural resource damages, and costs to state and affected counties and cities for their response actions, unquote.

This says to me the applicant can begin building the project, but before putting equipment into operation, they can decide what they think is an appropriate level of financial responsibility.

After that, the Department of Ecology determines whether the level of financial responsibility meets the legal requirements.

If the applicant agrees, then they can begin operating. What if the applicant cannot meet Ecology's requirements? Are they allowed to negotiate for a lower amount? Do they have to sell the already-built terminal to somebody else?

The financial responsibility requirement should be decided prior to the start of construction. It wasn't, and the rights to the facility proposed by Imperium was actually constructed by a company which bought the rights from the renewable energy group, and the new company lacked the resources of Westway or Renewable Energy Group, we could be left with a facility which at the current price of crude oil would only be profitable if sold at a loss and operated by some other company without the necessary resources to operate safely.

I ask you to revise the financial responsibilities section to assure that the applicant has the necessary resources prior to the start of construction. Thank you.

Response GP435-1

Under the proposed mitigation measure, demonstration of financial responsibility by the applicant would be made before operations can begin. For additional information about responsibilities in the event of a spill, refer to the Master Response for Liability and Responsibility for Incidents.

GP436, **Martin, Meredith**

Comment GP436-1

I live in the Columbia River Gorge (Hood River). I spend a lot of time windsurfing in the Columbia and biking on both the Oregon and Washington sides of the river. I am very worried about oil trains going through the Gorge. It seems like if there was ever an accident, it would be absolutely catastrophic. Although I know they it happens infrequently, if even one car or one train crashed or leaked, it could ruin the area I live in. Oil in the water would kill the wildlife and cancel windsurfing indefinitely. A spill or explosion near the little towns here would effect everyone. Please say no to the proposed Westway and Imperium oil terminals. We need to be thinking about cleaner energy, not transporting dirty oil via rail through scenic and sensitive areas.

Response GP436-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

GP437, **Mascarenas, David**

Comment GP437-1

My name is David Mascarenas. I'm from Everett, Washington, Snohomish County and Westport, Grays Harbor County. 0034

First of all, I object to the two-minute time limit. This issue is just too important to restrict taxpayers on this issue.

Response GP437-1

The time limit for public testimony in the main room was established to allow the greatest number of people to speak given the large turnout. Numerous other opportunities to comment were also available, including the opportunities to provide oral testimony to court reporters in semi-private areas at the open house and to provide written comments in various formats.

Comment GP437-2

Now you've already heard enough at these hearings that this is a bad proposal. No one gains from this but some oil companies who will make billions of dollars. We all get to take the risk of what's going to happen.

Now, NOAA came out last week with yet another survey that says low levels of oil from Alaska from Valdez is still affecting salmon here. And that just came up last week.

Denny Heck, Congressman, is introducing a bill called Puget Sound SOS to try to get federal dollars to help clean up Puget Sound, and federal agencies that cooperate with the State agencies to clean it up.

So it's a no brainer that we would once yet take another chance for fictitious jobs that we know are not going to be there. It's just not the risk. And you've all heard enough about the opposition to this thing. It's a bummer, folks. Just tell these guys no. If you want to have on oil factory wherever (inaudible), process it back there. Process it back there. Don't ship it out to us and have us take the risk and you sit back and make the millions. It's stupid. So please just say no. You've heard enough. Thank you so much. Good luck.

Response GP437-2

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP438, **Mascarenas, David**

Comment GP438-1

My name is David Mascarenas, Everett, Washington, Snohomish County. I object to the two-minute time limit. It's just not enough time for this important issue.

And the next thing is on this piece of literature, questions and answers, last page, who's responsible for cleanup and cost for a spill? Generally, responsible party for the spill pays for costs and damages.

As we all know, the spills and the fires have been happening on trains back East. The railroads and the parties simply declare bankruptcy and walk away, and they leave the burden for the cleanup to the local communities and to the taxpayers, and then these people simply turn around and they go to another county or down the road, and they start another corporation doing the same damn thing.

I think we are more enlightened in the state of Washington. I think the Ecology is more enlightened than most states. So I would ask you to make it $100 million performance bond of both these corporations to ecology. A nonrefundable $100 million performance bond to pay immediately for the cleanup that is going to fall to the Coast Guard, Ecology, and the citizens. So let's not let them declare bankruptcy and walk out of town.

Thank you.

Response GP438-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP439, **Mather, Linda**

Comment GP439-1

Good afternoon. My name is Linda Mather, and I live in Vancouver. I live within a two-mile blast zone of the tracks that would carry oil to Hoquiam and Grays Harbor. I object to the fact that the environmental impact statement does not include that area -- does not include the area below Centralia, all the way down through Vancouver and up the Columbia River through Washougal.

There are incredible amounts of people, environmental concerns along that area. And I think they should be considered. Please deny these permits for oil trains and terminals to this area. Thank you.

Response GP439-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

GP440, **Mayton, Leona**

Comment GP440-1

I, Robin Moore, am submitting this comment on behalf of a friend who does not have internet and cannot come to the hearings.

ATTACHMENT:

I am a 98 year old widow. I have lived in the same house for nearly 70 years. It is within two blocks of the tracks. I have seen the parked tanker cars and can see that they are old and rusty. I can live with the noise from train whistles. I don't even notice it anymore. I am most concerned with the trains coming through a populated area. I would be bothered by the smell. What will it do to our foliage and flowers? Will vegetables from neighborhood gardens be edible? Will we be able to hang our clothes out to dry?

I also have noticed more empty houses in the neighborhood. Houses don't sell. We have had more crime. Will these projects cause more "creeping decay"?

Response GP440-1

Draft EIS Chapter 3, Section 3.2, *Air*, describes potential impacts on air quality from construction and operation of the proposed action. Final EIS Section 3.2 reflects the addition of a discussion of potential impacts related to odor. The only compound with sufficient emissions to have the potential to have a perceptible odor is hydrogen sulfide. The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, are expected to reduce emissions of air pollutants, including hydrogen sulfide, to below the odor threshold for the most sensitive individual.

Draft EIS Chapter 3, Section 3.4, *Plants*, describes potential impacts on air quality from construction and operation of the proposed action. Final EIS Section 3.4 reflects the addition of a discussion of the potential for impacts on plants as a result of emissions from onsite operation or offsite transport; potential impacts would not be significant.

GP441, **McCarthy, Sally**

Comment GP441-1

Name: Sally McCarthy
City/ State/Zip: Aberdeen, WA 98520

Crude oil by rail will never be safe for this community The risks to the environment and community far outweigh the benefit that increased commerce could bring.

I do not believe the risk of even a minor oil spill can be condoned.

Response GP441-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP442, **McCrummen, JB**

Comment GP442-1

FAILURE OF DRAFT EIS; CALL FOR REJECTION DRAFT EIS AS WELL AS PROPOSED EXPANSION

The Draft EIS on the expansion of bulk liquid storage terminals (petroleum, other flammable and/or toxic liquids by Westway Terminal Company LLC and Imperium Terminal Services and located at the Port of Grays Harbor Terminal 1 is filled with misleading as well as erroneous information, missing analyses, a lack of known analytical methodology for both draft EIS and final EIS documents, artificial "boundaries" that purposely limit comments or facts about the impacts of oil trains to just Grays Harbor county, and does not address macro environmental as well as economic impacts of the proposed expansions due to the fossil fuels.

Based on the above summary, it is clear from the Draft EIS that the preparing firm and its employees and consultants have a bias toward Westway and Imperium. The Draft EIS not only violates rules and regulations governing the preparation of both a draft and final EIS, but was completed by an unqualified firm, if not a firm influenced by Westway, Imperium, and other fossil fuel companies or trade associations.

Therefore, the entire Draft EIS must be rejected as faulty and therefore, the proposed expansion rejected.

If, instead Hoquiam and DOE decide not to reject the project, then a new Draft EIS must be completed and by a different professional, non-biased firm, at the expense of the proposing companies. Neither Westway nor Imperium can be involved in the selection of a different firm or in the preparation of the new Draft EIS.

Response GP442-1

The commenter does not provide sufficient details to allow for response. Refer to responses to more specific comments below.

Comment GP442-2

I am submitting additional comments to illustrate the appalling nature of the Draft EIS.

<u>Comment Section: Draft EIS- Westway & Imperium Proposed Bulk Liquid Storage Terminals</u>

As noted in my introductory comments, I am calling on the Department of Ecology and City of Hoquiam to reject both the Draft EIS and the proposed expansion of oil and other petroleum products by Westway & Imperium. The Draft EIS does not meet the minimum legal standards of the required EIS nor does it meet the objectives outlined on the DOE Comment Web Page that states the Draft EIS must "identify existing environmental conditions, potential impacts on the environment and community, and mitigation measures to reduce or avoid the potential impacts."

The Draft EIS is prejudicial, non-responsive, and does not address analysis of critical impacts of the proposed expansion. As a result, the Draft EIS does not fully complete a Draft EIS, especially on critical strategies to avoid or mitigate environmental accidents or disasters, including:

OIL TRAINS AND TANK CARS

* The terminals would be fed by about sixteen loaded oil train deliveries every week (on average more than two per day) with more than 5 million gallons of oil daily (one barrel = 42 gallons) per day.

* The tank cars cannot be made crashworthy. Non-yard oil train derailment spills will occur, as outlined in recent studies focused on the Columbia River rail line. An oil spill would have significant and adverse impacts that cannot be prevented or mitigated. At best only 14% of the oil is recovered in a spill. Crude oil contains benzene which cannot be recovered from the water. The Draft EIS does not address this topic.

Response GP442-2

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* presents the analysis of risk of oil spills, fires, and explosions from rail transport related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Section 4.5.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident along the PS&P rail line. Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including a discussion of the potential longer-term impacts. Final EIS Section 4.3, *Risk Considerations,* reflects additional information about factors influencing cleanup.

Comment GP442-3

* The oil vapor pressure cannot be lowered enough to prevent ignition. When tank cars are punctured during a derailment, gases rush out and find a spark. Non-yard derailment spills usually lead to fire. Oil train fires are likely to cause burns, deaths, and property damage. Burns, deaths, and property damage are significant adverse impacts that cannot be prevented or mitigated. The Draft EIS does not address this topic.

Response GP442-3

Draft EIS Chapter 4, Section 4.5.2.2, *Fires or Explosions*, addresses potential risks related to fires or explosions associated with rail transport under the proposed action. Section 4.7, *Impacts on Resources*, describes potential impacts of fires and explosion.

Comment GP442-4

* Until all the tank cars have thermal jackets and high capacity pressure relief valves, tank cars sitting in a pool fire, are likely to explode. Firefighters cannot protect the public in those cases. Oil train explosions will be impossible to prevent for nearly a decade. The Draft EIS does not address this topic.

Response GP442-4

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* discloses voluntary measures and design features, applicant mitigation, and other measures that would further reduce

environmental health and safety impacts from rail transport related to the proposed action, in addition to regulatory compliance and best practices. To the extent possible, within the framework outlined in the Master Response for Mitigation Framework, measures addressing the need for more coordinated and focused planning include the role of the applicant as appropriate. However, as noted, no risks can be eliminated and, depending on the circumstances, significant impacts could occur.

Comment GP442-5

* Oil trains block traffic. They interfere with commerce, emergency response and school buses. The adverse impacts will be significant. These impacts cannot be mitigated. The Draft EIS does not address this topic.

Response GP442-5

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, addresses potential impacts on vehicle delay and emergency vehicle access. The Final EIS section clarifies mitigation and potential significant and unavoidable impacts.

Comment GP442-6

IMPACT ON CLIMATE CHANGE & AIR POLLUTION

* The proposed oil terminals will lead to a net increase of greenhouse gas emissions. The net global oil production could increase. This is additive. This is not simply replacing one oil source for another. The increases cannot be mitigated. The Draft EIS does not address this topic.

Response GP442-6

Refer to Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and for information on the likely destinations of crude oil shipped through the proposed facilities.

Comment GP442-7

DRAMATIC IMPACT ON RIVERS, FORESTS, COMMUNITIES, AND GRAYS HARBOR

* Increased train traffic of at least 16 more oil trains per week. With increased oil trains there will be an increase in the risks of oil train derailments and oil spills into the Chehalis River, Grays Harbor, (and of course the Columbia, Snake, and other rivers “outside” of the artificial boundary of the Draft EIS) and local communities near the rail trains. The increases cannot be mitigated. The Draft EIS does not address this topic.

Response GP442-7

Refer to Response to Comment GP442-2.

Comment GP442-8

Lower property values- residential, commercial, forest, with increased human diseases. The Draft EIS does not provide a fair and balanced economic analysis (that is, an accepted methodology for economic impacts) of the proposed impacts on property values along the rail line, from oil spills, conversion of the Grays Harbor diversified economy to an "oil economy", increased pollution and the increased illness due to the oil pollution, nor the impact on human health and animal life along the rail line. The topics cannot be mitigated. The Draft EIS does not address this topic. The Draft EIS does not address this topic.

Response GP442-8

Final EIS Section 4.7, *Impacts on Resources*, has been revised to more fully describe potential human health impacts. Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Draft EIS Chapter 3, Section 3.2, *Air*, presents potential impacts on the proposed action on air, including an analysis of cancer risk from emissions of diesel particulate matter related to rail transport in the study area. The Final EIS has been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analysis predicts lower emissions; the level of increased risk is not considered significant.

Comment GP442-9

* The Cost of Emergency Preparedness in all rail communities. NTSB says emergency response planning along the rail routes is "practically nonexistent". The Draft EIS does not address this topic.

Response GP442-9

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities in the study area. For more information about the analysis of potential impacts on the BNSF main line, refer to the Master Response for the Geographic Scope of the EIS.

Comment GP442-10

* Spill Cleanup delays. For example, it took decades for the spill to be cleaned up in the town of Skykomish, WA. The Draft EIS does not address this topic.

Response GP442-10

Comment acknowledged.

Comment GP442-11

* Grays Harbor. A single major spill could devastate the area's maritime economy, productive fisheries, tribal treaty rights and spectacular coastal waters.

Response GP442-11

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action.

Comment GP442-12

The twelve mile long Grays Harbor shipping channel is narrow, shallow, subject to strong currents and has limited staging area for ships and tugs.

Response GP442-12

State-licensed pilots work with the U.S. Coast Guard to avoid any risks associated with vessel transits during periods of poor weather and/or sea state conditions. Refer to Final EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*.

Comment GP442-13

If both terminals were expanded, 638 tankers and barges of oil would need to twice traverse Grays Harbor every year for a minimum of 1276 trips per year. Of course, there could be more trips.

Response GP442-13

As described in Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, the proposed action would result in a maximum of 238 vessel transits under maximum throughput operations; half of these trips would be laden vessels. As described in Chapter 6, *Cumulative Impacts*, the cumulative projects—the proposed action, the REG (formerly Imperium Terminal Services) Expansion Project, and Grays Harbor Rail Terminal Project —would add 758 trips.

Comment GP442-14

There is no analysis of the possibility of future dredging the channel and the impact on wildlife, fisheries, and the disposal of the dredged materials.

Response GP442-14

The proposed action would not require dredging or deepening of the navigation channel to accommodate proposed vessel traffic.

Comment GP442-15

The Draft EIS analysis of the impact on the Chehalis River, particularly as it moves into the Grays Harbor, is completely faulty-since it does not use data from the Chehalis River and Grays Harbor.

Response GP442-15

Refer to the Master Response for Oil Spill Modeling Methods.

Comment GP442-16

The Draft EIS does not address these topics.

* Transition to Green Energy Economy – not included due to bias by Draft EIS Preparer(s)

Governor Inslee has signed an executive order to reduce carbon emissions in Washington. The proposed expansion would violate that Executive Order.

The Draft EIS purports to provide an economic analysis of the proposed expansion and the value to the local economy. This analysis is clearly bias toward fossil fuels and this expansion, without providing an objective economic analysis, including negative impacts of the proposed expansion and alternatives in the Green Economy-like manufacturing products for the conversion to green energy resources. Of course, the State of Washington provides significant incentives for green economy employers-like for solar component manufacturing.

The Draft EIS does not address these topics.

SUMMARY

In summary, the above points are just a few of the inadequacies of the Draft EIS. They illustrate the unprofessional bias and misconduct of the preparers of the document including a bias toward fossil fuels and prejudice against local communities.

The Draft EIS must be rejected as must the proposed expansion. If DOE and Hoquiam don't reject the project on its face and based on the inadequacy of the Draft EIS, then a new Draft EIS by a different, professional and objective organization must be completed.

As Submitted by JB MCCRUMMEN, ROCHESTER, WA 98579 11/30/2015

Response GP442-16

Refer to the Master Response for Purpose and Focus of the EIS.

GP443, **McCuen, Annie**

Comment GP443-1

We must lessen the effects from impacts of oil and gas on this planet. Please, please, think ahead, beyond profits and immediate gratifications! Pleas protect our Columbia George from disasters. It belongs to all of us, not only to outsiders who want to use and abuse just for immediate money rewards. Please listen to the native nations, to the local people, to the citizens of Oregon and Washington States. Please set the priority right. Thank you for hearing my plea.

Response GP443-1

Comment acknowledged.

GP444, **McKinlay, Bonnie**

Comment GP444-1

All reputable climate science and first-hand observation of increasingly hotter global temperatures, extreme weather patterns, sea-level rise, and unprecedented glacier melt demand us to leave untapped oil resources "in the ground". The DEIS for the two proposed Grays Harbor--Westway and

Imperium--oil terminals lacks a careful examination of the need to stop the expansion in the extraction and transportation of oil. We cannot implement the necessary science-mandated transition to renewable energy sources while endorsing the construction of new oil-based infrastructure. The furthering of the proposed Westway and Imperium facilities undermines progress on renewable energy and ignores our responsibility for insuring climate balance for future life on earth. I urge you to give a close examination of the imbalance of seeking mitigation and "safer" operation of the two proposed Grays Harbor terminals with the much-needed advancement of renewable energy as you move forward with the FEIS.

Response GP444-1

Refer to the Master Response for Purpose and Focus of the EIS.

GP445, **McLachlan, Pat**

Comment GP445-1

My Comments on the Draft Environmental Impact Statements for the Imperium and Westway Oil Export Proposals

Dear Washington State Department of Ecology and City of Hoquiam staff and elected officials,

Good Afternoon, My name is Pat McLachlan. I have lived and worked in Washington State most of my life; since 1970 in Olympia in Thurston County, teaching high school and then managing state-wide housing programs with the Department of Commerce. I have been diving in the waters of Puget Sound. I have hiked, and photographed in the Olympic National Park interior and along its beaches. I have studied shorebirds at the Grays Harbor National Wildlife Refuge.

Westway and Imperium propose to add up to 14 storage tanks and a throughput of almost 2 billion gallons of crude oil a year through their facilities at the Port of Grays Harbor. They want to add 1,188 additional train trips and 638 additional vessel trips per year, the Draft Environmental Impact Statement (DEIS) shows.

Oil spills will happen; they do all the time. In Sightline Daily, Eric de Place describes 17 devastating oil spills from 1976 to 2014 in the U.S. that could also happen here in the Pacific Northwest. After all, Ecology reports that almost 1 billion gallons of crude oil was transported in Washington State in 2013. This proposal would add another 2 billion, making a total of 3 billion gallons of oil transported annually. And numbers of spills are up. In McClatchy News, Curtis Tate states that more crude oil was spilled in U.S. rail incidents in 2013 than was spilled in the last 40 years; 1.15 million gallons of crude oil was spilled.

Ships and tankers spill oil and even drill rigs, and the costs to companies, governments, and all life are devastating.

The Exxon Valdez tanker ran aground in 1989 spilling 11 million gallons of oil along 1,300 miles of shoreline and costing Exxon $2.1 billion. The cleanup was never completed. Fisheries, local human residents, recreational sports and tourism experienced long-term adverse affects. The list of dead wildlife is endless; 250,000 sea birds dead, billions of salmon and herring eggs gone. Many species experienced long-term losses and have not recovered.

The BP Deepwater Horizon in 2010 spewed 130 million gallons of oil into the Gulf of Mexico costing BP $28 billion and counting to address cleanup, loss of fisheries and tourism, and human ill health effects. Death of enormous numbers wildlife continues, including hundreds of thousands of seabirds. The cleanup is not completed.

The risks for an oil spill from a train or tank or ship are huge, especially since the large tankers can contain 26 million gallons of oil, yet the DEIS says a chance of a large spill is "unlikely," admitting when it does occur "there would be the potential for severe impacts on the environment or humans." I believe given the data on frequency of oil spills that the DEIS needs to be corrected to the chance of a larges pill is "likely" and I agree the impacts will be severe. The damage will be significant, adverse and unavoidable. The costs will bankrupt companies and communities. Many lives will be lost. Therefore, this proposal should be rejected.

Response GP445-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP445-2

Two billion gallons a year of dirty, crude oil will be come from oil fields in North Dakota and Canada by trains that wend their way through small and large towns in Washington to be loaded into the tanks in Grays Harbor. From these large tanks, this oil will be loaded into ships that will ply the coastal water north, south and west to refineries and to China. And if this isn't risky enough with aging rails, and tanker cars; narrow harbors with excess boat traffic; and sometimes fierce ocean storms, these actions involving a dangerous pollutant will also take place on the Cascadia subduction earthquake zone which runs 700 miles from California along Oregon and Washington to Vancouver Island, Canada.

In "The Really Big One," Kathryn Schultz, notes that the Pacific Northwest sits squarely within the Ring of Fire. The science is robust. The Cascadia zone has experienced 41 large earthquakes in the past 10,000 years, an average of 1 every 243 years. It has been 315 years since the last one which was a 9 magnitude in 1700. The odds of the big Cascadia earthquake of an 8 to 8.6 magnitude happening in the next 50 years are roughly 1 in 3. The odds of the very big one of a 8.7 to 9.2 are 1 in 10.

When the next full-margin rupture happens, this will be the worst natural disaster in the history of North America. And it is predicted that an 8 or 9 earthquake and the accompanying 100 foot tsunami will wipe out the oil tanks storing the oil in Grays Harbor and the ships loaded with it in the harbor and along the coast. Along with the earthquake's devastation will be spills of hundreds of millions of gallons of oil along the beaches and in the harbors, polluting water, land and air and killing everything in their path.

The magnitude 9.0 Tohuku earthquake and subsequent tsunami in Japan in 2011 killed more than 18,000 people, devastated northeast Japan, triggered the meltdown at the Fukushima nuclear power plant and cost an estimated $220 billion and counting.

The DEIS, gives the chance of a large earthquake happening as "unlikely," when the data shows it is "likely." This needs to be corrected. The DEIS does say if a large earthquake occurs, "There could be the potential for sever impacts on the environment or humans" or oil spilling. I agree: the damage will be significant, adverse, and unavoidable. The costs will bankrupt companies and communities. Many lives will be lost. Therefore, this proposal should be rejected.

Response GP445-2

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and for information on the likely sources and destinations of crude oil shipped through the proposed facilities.

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction. Final EIS Chapter 3, Section 3.1, *Earth*, clarifies language characterizing the likelihood of events.

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment GP445-3

I believe that State of Washington should deny these companies permits and that these terminals should not be built.

Further, I am a member of Great Old Broads for Wilderness, and we believe that we must keep fossil fuels such as oil in the ground. "It is our only chance to keep global temperatures and the Earth's vital signs from reaching a tipping point." Burning oil for energy heats up our planet. We have a brief span of time to make a difference. We must act now.

By saying no to Imperium and Westway Oil Companies, we can prevent the building of more infrastructure in this area that supports fossil fuel use. We can also prevent the widespread destruction of life that oil spills inflict. Hopefully in the future, Washington State and our federal government can do more to encourage companies to move beyond oil to invest in clean, renewable resources, such as solar, wind, and biofuels to meet our energy needs and to minimize the impact on our previous Earth and its inhabitants.

Respectfully submitted,

Pat McLachlan,
5505 Oyster Bay Rd. NW,
Olympia, WA 98502

Response GP445-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP446, **McLachlan, Pat**

Comment GP446-1

My name is Pat McLachlan. I've lived in Washington state most of my life, since 1970 in Olympia, in Thurston County teaching high school and then managing housing programs in the Department of Commerce. I've hiked and photographed the Olympic National Park and along its beaches. I've studied shorebirds of the Grays Harbor National Wildlife Refuge. I love this area and want to protect it.

Westway and Imperium propose to add up to 14 storage tanks which can handle almost two billion gallons of crude oil a year through their facilities at Grays Harbor. They want to add 758 train trips and 638 vessel ships per year. Oil spills will happen. They do all the time. It could also happen here.

Adding two billion to the already one billion gallons of crude oil transported here in this state will make spills more likely. And the number of spills are up. More last year in the U.S. than in the preceding 40 years.

The risk of an oil spill from a train accident or large tanker is huge, especially if the large tankers can contain 26 million gallons of oil. The DEIS says the chance of a spill is unlikely, admitting that if it does occur, there would be potential for sever impact on the environment.

I believe given the data that the DEIS needs to say that a large spill is likely and indeed the impact would be severe. The damage would be significant, adverse, and unavoidable. The cost is bankrupt companies and communities. Lives will be lost.

Washington should deny these companies' permits and these terminals should not be built. I'm a member of Great Old Broads for Wilderness and we believe that we must keep fossil fuels such as oil in the ground.

Burning oil for energy heats up our planet. We must act now by saying no to Imperium and Westway oil companies. We can prevent the building of more infrastructure that supports fossil fuel used. We can also prevent the widespread destruction of life that oil spills can inflict.

Our government must encourage companies to invest in clean, renewable resources like solar, wind, and biofuels to meet our energy needs and to minimize the impact on our precious earth and its inhabitants.

Thank you.

Response GP446-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted,

mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on birds.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP447, **McLachlan, Pat (Great Old Broads for Wilderness)**

Comment GP447-1

I'm Pat McLachlan, and I've lived and worked in Washington state most of my life. Since 1970 in Olympia in Thurston County teaching high school and then managing state-wide housing for low-income families with the Department of Commerce.

I've been diving in the waters of Puget Sound, I've hiked and photographed in the Olympic National Park. I've studied shorebirds at the Grays Harbor National Wildlife Refuge.

There are seven federally protected wildernesses on the Olympia Peninsula. They are the Washington Islands off Hoquiam and the rest of the coast northward, and others, including the Olympia Wilderness Beaches.

I love these wilderness areas and know that many other people feel the same way. We go to the wilderness to experience beauty, solitude, adventure, spiritual renewal, physical challenge, and a connection to plants, birds, fish, animals, and each other. We want to protect these wildernesses.

They will be damaged by spills and explosions when millions of gallons of crude oil are transported on trains into this area, stored in oil tanks, and loaded onto ships that travel the coastline to refineries.

Pollution of our air, land and water is part of this fossil fuel nightmare. Oil spills and explosions will be caused by derailments of oil tank cars. Train engines pulling tank cars and onsite operations at oil terminals will release toxic pollutants. Accidents involving ships will despoil our beaches.

These wildernesses and the Grays Harbor National Wildlife Refuge all have protection under federal laws. I request that your EISs describe how these proposals will affect them. I believe that these proposals must be rejected or the laws protecting our wildernesses will be broken.

The pollution caused by dirty oil will cause significant environmental damage and it cannot be mitigated. I believe that Washington should deny these companies' permits and these terminals should not be built.

Further, I'm a member of Great Old Broads for Wilderness and we believe that fossil fuels such as oil must be kept in the ground. Burning oil for energy heats up our planet. We must act now by saying no to Imperium and Westway oil. We can prevent the building of infrastructure that supports fossil fuel use. Our state and federal governments must encourage companies to invest in clean energy such as solar and wind to protect this precious earth. Thank you.

Response GP447-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms, including impacts on plants and animals, and clarifies that while impacts would depend on the circumstances of the incident, the resources described in Chapter 3 could be affected.

Final EIS Chapter 4 reflects additional mitigation measures proposed to address these impacts. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP448, **McManus, Tony**

Comment GP448-1

My name is Tony McManus. I am a resident of Ocean Shores. I'm retired out of Hanford Nuclear Range, so I have a vested interest in keeping things cleaned up.

Two of the issues that I have not heard addressed about this bulk oil proposed terminal.

One is what are they going to do with the additional dredged material, how deep does it have to be, how wide does it have to be, and what are they going to do with that material?

Response GP448-1

The proposed action would not involve any dredging activities.

Comment GP448-2

The other thing is where are they going to discharge the water ballast. I would hate to see us get in a situation like the Great Lakes where Asian carp and other invasive species are discharged into our waters.

Tankers, when they're empty, ride very high. During our winter storms, they are not going to discharge that water out miles into the ocean.

There are a thousand steps that have to be performed, every action perfectly, every transfer, every mile of track, every hooking up of pipes, and they have to be executed perfect every time. It's not going to happen.

We cannot afford to spoil the bottom of our harbors, our rivers, our marine life, our tourist destinations, the fisheries, so many industries, the oyster crops. That's actually all I have.

Response GP448-2

Draft EIS Chapter 3, Section 3.3, *Water*, Section 3.4, *Plants*, and Section 3.5, *Animals*, describe potential ballast water impacts and the regulatory requirements to reduce these impacts. Section 3.4.7.1, *Applicant Mitigation*, and Section 3.5.7.1, *Applicant Mitigation*, identify mitigation measures to further reduce potential impacts.

GP449, **McMurray, Maureen**

Comment GP449-1

My comments relate to both the Westway and Imperium Draft EISs.

Please do not proceed on the crude oil terminal in Grays Harbor. There is no way to mitigate the risks and dangers involved. This is the wrong place, the shallow shipping channel and strong currents is sets it up for a greater chance of an oil spill. That would devastate the area for all other type of economic environmental health. The oil trains are both dirty and dangerous. The history of oil train fires and explosions are proof of the danger to people and the environment.

The air pollution from the trains would be emitted near homes and businesses. Higher level of diesel particulate pollution is shown to increase the risk of cancer asthma and other respitory ailments. This in addition to all the negative traffic impact is ample reason to not proceed with the proposal. There is a better way to meet our energy needs.

Response GP449-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Final EIS Chapter 3, Section 3.2, *Air*, has been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analysis predicts lower emissions; the updated level of increased risk is not considered significant. Therefore, the Final EIS concludes no potential unavoidable and significant adverse impacts on air quality.

GP450, **McVaugh, Skyler**

Comment GP450-1

Please take into account the current condition of the railway that will be used to transport the oil. The railways that are proposed to be used are outdated do not seem to be up to the task of supporting the proposed railway traffic if this project comes to fruition.

Response GP450-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP450-2

Furthermore please also take into account the amount of diesel pollution from the oil trains that will be emitted near homes and businesses between Poyner Yard and the Westway Imperium sites.

Response GP450-2

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant.

Comment GP450-3

Lastly, please consider a very effective emergency response plan should an oil tanker or oil trail crash and spill oil into the environment. Thank you for your time.

Response GP450-3

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location,

amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

GP451, **Meacham, Michael**

Comment GP451-1

Dear Consultants, Ecology and City of Hoquiam, The people of the State of Washington have the right to decide which risks they are willing to accept and which they are not, and just because some dangerous projects were permitted, that doesn't mean we should approve more of them. We urge you to reject the oil terminals proposed in Grays Harbor because they will create the following significant and adverse impacts which cannot be avoided or mitigated and are unacceptable.

Response GP451-1

Refer to responses to detailed comments below.

Comment GP451-2

1. The tank cars cannot be made crash worthy. Non-yard oil train spills are guaranteed to happen in the extended area several times per decade with significant and adverse impacts that cannot be mitigated.

Response GP451-2

Draft EIS Chapter 5, Extended Rail and Vessel Transport, addresses potential impacts from rail and vessel transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Final EIS Chapter 5 further describes the potential risks associated with rail transport in this area.

Comment GP451-3

2. The oil vapor pressure cannot be lowered enough to prevent ignition. When tank cars are punctured during a derailment, gasses rush out and find a spark resulting in large explosions, death and property damage.

Response GP451-3

Draft EIS Chapter 4, Section 4.5.2.2, *Fires or Explosions*, addresses potential risks related to fires or explosions associated with rail transport under the proposed action. Section 4.7, *Impacts on Resources*, describes potential impacts of fires and explosion.

Comment GP451-4

3. Until all tank cars have thermal jackets and high capacity pressure relief valves, tank cars sitting in a pool fire are likely to explode. Firefighters cannot protect the public in those cases.

Response GP451-4

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* discloses voluntary measures and design features, proposed applicant mitigation, and other measures that would further reduce environmental health and safety impacts from rail transport related to the proposed action, in addition to regulatory compliance and best practices. To the extent possible, within the framework outlined in the Master Response for Mitigation Framework, measures addressing the need for more coordinated and focused planning include the role of the applicant as appropriate. However, as noted, no risks can be eliminated and, depending on the circumstances, significant impacts could occur.

Comment GP451-5

4. Oil trains block traffic. They interfere with commerce, emergency response and school buses. the adverse impacts will be significant.

Response GP451-5

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, addresses potential impacts on vehicle delay and emergency vehicle access. The Final EIS section clarifies mitigation and potential significant and unavoidable impacts.

Comment GP451-6

5. The oil terminal will stink, particularly if the vapor combustion unit fails. The city of South Portland, Maine has banned the trans-loading of crude oil into marine vessels for that reason. Hydrogen sulfide first deadens the sense of smell, then it kills you. It gets trapped in in low lying pockets.

Response GP451-6

Final EIS Chapter 3, Section 3.2, *Air*, reflects the addition of a discussion of potential impacts related to odor. The only compound with sufficient emissions to have the potential to have a perceptible odor is hydrogen sulfide. The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, are expected to reduce emissions of air pollutants, including hydrogen sulfide, to below the odor threshold for the most sensitive individual.

Comment GP451-7

6. False prosperity. An oil terminal can only begin the slide toward altering the landscape, river, and quality of life here. There will be no other direction once it begins. The construction unions in Texas oil towns have been starved to death. And once they've get their foot in the door, big oil is as happy as any other corporation to break unions. The prosperity we're being offered is a poison pill.

Response GP451-7

Comment acknowledged.

Comment GP451-8

7. The proposed terminals will lead to a net increase in greenhouse gas emissions. If all the terminals in Washington and Oregon are approved, the net global oil production could increase 496,000 barrels per day. This is additive. This is not simply replacing one oil source for another.

Response GP451-8

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and for information on the likely destinations of crude oil shipped through the proposed facilities.

Comment GP451-9

8. Lost property values moer than reported in the Economic Impact Analysis Planning model used by ECONorthwest. That model doesn't distinguish between unit oil trains and other types of freight.

Response GP451-9

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

Comment GP451-10

9. The Cost of Emergency Preparedness in all rail communities. NTSB says emergency response planning along the rail routes is "practically nonexistent".

Response GP451-10

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities in the study area. For more information about the analysis of potential impacts on the BNSF main line, refer to the Master Response for the Geographic Scope of the EIS.

Comment GP451-11

10. I worry about the future of my children and grandchildren. It is well documented that climate change is happening, and that Humans burning fossil fuels is the major cause of it. If we don't begin to move away from fossil fuel use NOW, we will be leaving an Earth that will be uninhabitable for future generations. Is it really worth short term financial gain when the future of our beautiful planet is at stake?

Response GP451-11

Comment acknowledged.

GP452, **Megargle, Paul**

Comment GP452-1

I SUPPORT the project. I want to see more bio diesel and bio jet fuel available, I want more jobs in Grays Harbor. Westway and Imperium have a very good track record of Safety. I would be proud to work with them or for them. I live and raise my family in the immediate area. I also think it's better to have the products going here rather than Puget Sound.

Response GP452-1

Comment acknowledged.

GP453, **Mergler, Gerald**

Comment GP453-1

Concern & Question Oil Car safety is a major concern of mine, both on Life and environment. In review of the subject projects the issue of DOT-111, modified and newer CPC-1232 cars, significant articles, and scientific reports indicate they are not SAFE ENOUGH for transport of the proposed oil! Question-- Why is the latest design,DOT-117 Car, not required as only acceptable rail car for this kind of transport? Time to produce sufficient cars to meet demand should not be sufficient reason unless DOT can put a value of life factor vs. loss of revenue to justify not waiting for car availability. Thank You Jerry Mergler

Response GP453-1

Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and that all existing tank cars be retrofitted in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643). However, as noted in Section 4.5.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport?* the risks cannot be eliminated.

GP454, **Mergler, Gerald**

Comment GP454-1

Concern/Question: The statistical analysis appears to me to be faulty and presents a rosier picture of probable spills and does not provide a adequate cost/benefit analysis associated with spill cleanup, Injury and death associated hazardous material transport by rail car for any accidents. As example, Fig. 6-7 shows scenarios and associated risks. Small spills have higher potential for occurrences and large spills less occurrences. This has significance in decision making if it is associated with some cost/environmental impact, injury or loss of life. I worked on the APOLLO Space Program in the 1970s and initial statically reliability reflected a very high probability of success but when potential loss of life was factored into the statistics, decisions to design costly redundancy into design because of the potential loss of life. Where is this kind of analysis? Same here in oil transport. we have recently seen oil car disasters with associated loss of life and injury. The analysis is skewed toward

positive results. Same section shows extreme failure of storage tank occurring every 9000 years!! What tank built today has a functional life of 9000 years? Although it sure sound good. Why is there little cost/risk analysis? The cumulative impacts section (Chapter 6) also evaluates various types of risks such as Rail and vessel. What is lacking is a beginning to end analysis which combines the various Cumulative failure points. My question is "what is probability of a mishap during a combined rail/handling/storage/loading and then vessel transit of any kind from point of origin until delivery?

Response GP454-1

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

GP455, **Mergler, Gerald**

Comment GP455-1

Concern/Question: I live near the entrance to Grays Harbor in Ocean Shores WA for past 10 years and I have experienced the coastal weather extremes at harbor entrance and along our coast. Why does this report not adequately and specifically address all potential environmental and economic impacts on our city (Ocean Shores) Ocean Shores in a spill event along the coast as well as within the bay and rivers? With our tidal currents and ocean currents, any spill occurring on the rivers feeding into the Grays Harbor Bay, within the bay and entrance as well as out to the barge or vessel coastal traffic lanes, The potential is catastrophic on the Marine life, Coastal birds including millions of seasonal fly-way migration shore birds, economic impact to our city (Tourist destination point) and our local sport and commercial fisheries. Where is this analysis in subject reports? How is this city protected from financial losses? Thank You Gerald Mergler

Response GP455-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP456, **Mergler, Gerald**

Comment GP456-1

Concern/comment: I live in Ocean Shores WA near the Grays Harbor entrance. In section Chapter 3 "Escort Tug service", indicates existing Emergency Tug Service at Neah Bay! My question is this, how does this much needed support in case of a barge or vessel major spill help us? Even smaller spills on our community beaches could require this type of support. Our sea conditions are some of the worst along the West coast of US. 12 to 18 hour delay, indicated in the report 3.17-9, along our coast line or within our harbor would be catastrophic. Why does this report not provide much analysis of coastal impacts especially on the towns such as Ocean Shores and Westport WA?

Response GP456-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. The geographic response plans referenced in Final EIS Chapter 4, Section 4.2, *Applicable Regulations*, provide additional information on sensitive resources that could be affected by a spill at specific locations in the study area. The plans also identify appropriate response strategies. Final EIS Sections 4.4.3, 4.5.3, and 4.6.3 have also been revised to include additional mitigation measures to address risk related to spills, fires, and explosions. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

GP457, **Mergler, Gerald**

Comment GP457-1

Comment/Question: Chapter 3 Ballast water (3.3-25 describes the ballast water delivery plan for ships/barges that enter Grays Harbor. My concern is our coast is heavily reliant on our shellfish and fish recreation and commercial fisheries. This section of report notes that "The increase in number of oil related vessels entering the port (max 119/yr) would increase the risk of introducing invasive aquatic plants and other organisms and I assume other non-native marine life. This could have serious impact on our Fish and Shellfish sport and commercial industries. What plan would be implemented to eliminate these potential problems and how would it be managed?

Response GP457-1

Potential ballast water impacts on the aquatic environment are addressed in Draft EIS Chapter 3, Section 3.4, *Plants*, and Section 3.5, *Animals*. Existing federal and state regulations address ballast water management. The Washington State ballast discharge regulations (RCW 77.120.040 and WAC 220-150) include reporting, monitoring, and sampling requirements of ballast water; all vessels must submit nonindigenous species ballast water monitoring data. Washington Department of Fish and Wildlife may also board and inspect vessels under WAC 220-150-033 without advance notice to provide technical assistance, assess compliance, and enforce the requirements of Washington State ballast water management program laws and regulations. Penalties and enforcement of not complying with the regulations are covered in WAC 220-150-080. To further minimize the risk of ballast water on vegetation communities and animals, proposed mitigation is included in Sections 3.4 and 3.5 for the applicant to develop and implement a monitoring plan in consultation with Washington Department of Fish and Wildlife prior to the start of proposed operations.

GP458, **Messmer, Louis**

Comment GP458-1

My name is Louis Messmer. I'm a retired Grays Harbor biologist. I'm here to speak about the effects of the plants and the ecosystem. I've led a few hundred field trips around Grays Harbor, and I've work in an industrial pollution control lab for six years. I've worked in razor clam biology for six years, and as a wetlands consultant I've completed 70 projects in the Grays Harbor area.

We, the people, have worked our way into this beautiful Grays Harbor ecosystem only in the last few thousand years. It now sustains at least 30 percent of our jobs and economy.

The plants sit at the base of the food pyramid that sustains our ecosystem. In sunlight, those wetland and aquatic plants make -- convert carbon dioxide and water with minerals to create tens of millions of pounds of organic matter per year. This food material is used over and over to support the rest of the players in the ecosystem.

A major oil spill would shut down that plant base of the system for years, at least. The impact of such a spill is inevitable and unavoidable given human error, equipment failure, and more extreme natural disasters.

There is no way to offset or make up for such an impact. The no action alternative is essential for these oil port proposals.

Thank you.

Response GP458-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. This includes the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. However, as

noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

GP459, **Messmer, Louis**

Comment GP459-1

October 6, 2015 Westway and Imperium Terminal Services Expansion Projects EISs. c/o ICF International 710 Second Street, Suite 550

Seattle, WA 98104 My comment on: lmperium Health, economy, aesthetics

I am a resident in a senior community in downtown Hoquiam. Right now, the air quality here seems to be good. I feel that any new, larger oil terminal here would generate odors (fumes) in its day-to-day operations that could cause respiratory problems to the residents here. (Health) Additionally, prospective residents of similar senior health care residences or their caregivers could be repelled by those odors.(Aesthetic), (Economy).

These are very probable negative impacts on the health and the economy of this town.

Of course, any large spill in the Harbor would make things worse.

Sincerely,

Louis W. Messmer 907 K St. Apt 609 Hoquiam, WA 98550 (360) 532-7851 lmessmer@reachone.com

Response GP459-1

Final EIS Chapter 3, Section 3.2, *Air*, reflects the addition of a discussion of potential impacts related to odor. The only compound with sufficient emissions to have the potential to have a perceptible odor is hydrogen sulfide. The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, are expected to reduce emissions of air pollutants, including hydrogen sulfide, to below the odor threshold for the most sensitive individual.

GP460, **Messmer, Louis**

Comment GP460-1

Nov.15, 2015 Westway and Imperium Terminal Services Expansion Projects EISs c/o ICF International 710 Second Avenue, Suite 550 Seattle, WA 98104

I am a resident of the city of Hoquiam and a retired biologist.

I am concerned about the potential impact upon the young salmonids that rear in and pass through Grays Harbor from on-going operations or spills at the proposed oil facilities here.

978 pgf

There are several studies reported that document adverse effects on salmonids from exposure to petroleum-related products.

These studies cite effects on behavior from concentrations as low as ten parts ber billion (10) ppb).

The EIS mentions toxicity at levels beginning at (15) ppb. for some animals in the study area.

There is no attempt to relate any of these toxicity levels to Grays Harbor waters to the proposed scenarios.

What dilutions in amounts of Harbor waters would produce 10 or 15 parts per billion, (10-15) ppb?

For instance: **1 gallon in XXXX gallons of Harbor water at the operation site; or 1 drop of oil in 75,000 gallons of water**.

Sincerely, Louis W. Messmer 907 K St. Apt 609 Hoquiam, WA 98550 (360) 532-7851 lmessmer@reachone.com

Response GP460-1

Parts per billion (ppb) refers to the concentration of one unit of measure in one billion equivalent units. For example, 10 ppb could refer to 10 gallons of crude oil in one billion gallons of water.

The approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms, including the potential impacts related to toxicity. Section 4.7 also acknowledges resources that could be adversely affected in the event of an oil spill, fire, or explosion in the study area, including impacts on salmonids.

Final EIS Chapter 4 reflects additional mitigation measures proposed to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances of an incident, the environmental impacts could be significant.

GP461, **Messmer, Louis**

Comment GP461-1

Nov. 20, 2015 Westway and lmperium Terminal Services Expansion Projects c/o ICF International 710 Second Avenue, Suite 550 Seattle, WA 98104

There are several shortcomings in the descriptions of the study area within Grays Harbor: These tend to downplay the dimensions of the plant base of the ecosystem that is impacted by oil that spreads onto the Harbor surface

1.The full area of the intertidal within the Harbor (from construction sites to the Harbor mouth): This could be around 60,000 acres.

2.The area of potential eelgrass habitat is probably larger than the "7605 acres" due to recent invasion of Zostera japonicaat mid-tidal levels. This has become great enough to provoke negative reactions from shellfish growers.

3.The extent of productive high salt marsh beyond the mapped and mentioned "high quality salt marsh" becomes notable when you drive the roads around the Harbor and its tributaries noting that tidal mudflat edges are bordered by Carex lyngbyei , and other high marsh associates except where development or bank erosion prevents it.. Even a large fraction of this un-noted strip of high marsh 3 feet wide could be responsible for tens of tons of dry weight organic matter per year.

Sincerely,

Louis W. Messmer 907 K St. Apt 609 Hoquiam, WA 98550 (360) 532-7851 lmessmer@ reachone.com

Response GP461-1

The vegetation study area is shown in Draft EIS Figure 3.4-2, *High-Quality Vegetation Communities in and along the Shoreline of Grays Harbor*. As shown in the figure, this study area covers all of Grays Harbor plus an additional 0.5 mile around Grays Harbor. Draft EIS Chapter 3, Section 3.4, *Plants*, covers aquatic vegetation (eelgrass and macroalgae), salt marsh and dunegrass, kelp, and low-elevation freshwater wetlands. The Draft EIS estimates the maximum area of Grays Harbor where eelgrass grows or could grow; Section 3.4.4.3, *Grays Harbor*, *Aquatic Vegetation*, *Eelgrass*, states that at least 7,605 acres of Grays Harbor are estimated to lie at elevations suitable for eelgrass according to one study, but that up to 15,000 acres of the harbor are at elevations that could support eelgrass based on bathymetric analyses. Draft EIS Chapter 3, Section 3.4, *Plants*, provides the general locations and descriptions of salt marsh vegetation communities in the study area.

GP462, **Messmer, Louis**

Comment GP462-1

November 23, 2015 Westway and lmperium Terminal Services Expansion Projects EISs· c/o ICF International 710 Second Avenue, Suite 550 Seattle, WA 98104

I am a retired biologist. I have worked six years in the WDF shellfish mangement program, taught Marine Biology, Zoology, Botany and Gdneral Biology here at Grays Harbor College, and have been involved in Sea Grant programs on Grays Harbor and USAGE Channel project planning. projects.

I am concerned about the potential impacts to the surf-zone populations of razor clams on the outer Washington coast.

The razor clam populations are found on sandy beaches 20-30 miles north and south of Grays Harbor in some of the most productive surf zones on earth. We are able to harvest the clams at the first step in the food web where they filter-feed on surf-zone diatoms. Masses of those golden-brown diatoms are often found on the beaches at low tides in layers several inches thick or coloring the surf and foam. We benefit economically from other components of the surf-zone diatom based food web such as the Dungeness crab fishery.

The vessel traffic, as described, increases the shipping traffic in the narrow space between the north and south jetties for about 5 nautical miles. While the shipping channel is already narrow, this increases the chances of accidental hull from the jetty rocks. Other parts of the channel only are bordered by more yielding mud or sand sediments Pilot error and machine breakdown have occurred here in the past. Of course, any large spills in the Chehalis drainage could also reach the coast.

The few benefits of the proposed oil port terminals are short-term. The sustainable economic, aesthetic and social benefits of the present situation would suffer hugely from the impacts of large oil spills. Sincerely,

Louis W. Messmer 907 K St. Apt 609 Hoquiam, WA 98550 (360) 532-7851 lmessmer@ reachone.com

Response GP462-1

Draft EIS Chapter 4, Section 4.6, *Environmental Health Risks—Vessel Transport*, presents an analysis of potential impacts from increased risk of vessel collisions, groundings, and allisions and related consequences (e.g., release of crude oil) under the proposed action and proposes mitigation measures to reduce the likelihood of a vessel incident.

GP463, **Meyer, Bonnie**

Comment GP463-1

Please do not allow expansion of the two Grays Harbor terminals. I frequently visit this area to look at birds. Many visit on annual migrations. The birds would be at risk from terminal expansion. This is not a good place for a dirty terminal that could cause environmental harm. Any migrations to the potential harm would be useless should there be severe storms or weather. This is too risky and not in the best interest of residents and wildlife.

Response GP463-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP464, **Meyer, John**

Comment GP464-1

My name is John Meyer. I live in Marquam, Washington, Grays Harbor County. I was employed for 27 years in the operations end of the railroad business, and I just have two things that I think the EIS would benefit from mentioning.

Number one, with regard to train delays, out at the mall particularly, they did a very good job of talking about how long the delays are. I would posit that if they would mention that if the track speed was raised to 20 miles an hour, a one-mile-long train would only occupy a crossing for three minutes.

The problem they have now is there's a five-mile-an-hour speed restriction over the Wichita River draw. And once that's repaired, and if you put lights and gates on the crossing, you could have a whistle-free zone and the Federal Railroad Administration is all for them.

Response GP464-1

Draft EIS Section 3.16, *Vehicle Traffic and Safety*, analyzed potential impacts with speed restrictions over the Wishkah bridge at 5 miles per hour in 2017. As described in Section 3.15, *Rail Traffic*, PS&P has identified an improvement to the Wishkah bridge to improve speeds across the bridge by 2037.

Comment GP464-2

Second of all, there's been constant comment and full magnum of fear in the process of this with regard to the -- they keep mentioning the Canadian derailment where all the people were killed. It would help if they mentioned that cannot happen in this project. The track is flat. That train was sitting on a hill of such steepness and duration, the train got up to over 60 miles an hour before it went to a flat curve at the bottom and derailed, although the engines made it around into a town full of LPG. That's how they heat it. And everything started blowing up.

We cannot have any kind of derailment of that magnitude anywhere in this flat area here. It won't happen, can't happen, and we ought to quit fulminating the fear and hysteria that's being used in the media in order to derail this project here. Thank you.

Response GP464-2

Comment acknowledged.

GP465, **Meyer, Jon**

Comment GP465-1

My name is Jon Meyer. I was employed in the railroad industry in operations for 27 years. At one point, I was the division trainmaster for the Burlington Northern Railroad, and my territory included the mainline tracks between Astoria, Oregon and Wishram, Washington following the Columbia River by and large.

One morning, during a conference call, I was alerted to the fact that we had a derailment of Train 691, a Pasco/Tacoma mixed freight train, that had derailed in the vicinity of the Wind River Bridge and partially into the Columbia River and two tank cars of oil were involved, two or three.

We sent a copy of the wheel report of all of the train list to the relevant public officials in that county including where all of the hazardous cars were and the hazardous handling response forms for each of those commodities.

By the time I got up there, our contractors had already spread the absorbant materials to -- in case of leakage on the Columbia River. The railroad keeps those kinds of materials stashed in containers along the right-of-way, and we have contractors available, 24-hour calls, on call.

When I got up there, I determined that it was either two or three tank cars of oil had -- were part of the derailment. They didn't cause it, but they were part of it, and they had ricochetted off of the

abutment of the bridge of the Wind River where it joins the Columbia. This is right next to Drano Lake.

The cars then rolled down the embankment approximately 50 feet down rip rap rock and landed in the Columbia River with such a splash that one of the trollers, salmon trollers, claimed we drowned out his engines. That wasn't the case. Other fishermen told us that he couldn't get them started before the wreck happened, and I would have had him arrested by our special agents, but we had a lot more fish to fry at that point.

It was determined that there was no leakage of these cars, and we proceeded to pick up the derailment and open the mainline. This took approximately a day and a half.

I remember that we had at least 25 public officials there concerned about the Gorge and the river and the tank cars, among other things.

After about a day and a half, a van pulled up and it had two sets of scuba divers in it, two teams. We had to use two because it was so deep there that they would get the bends if they didn't decompress on their way up.

Shortly thereafter, a barge crane that I had hired -- I think from Rydell International, but I can't be sure. I can't remember for sure -- showed up with this tugboat, and we proceeded to raise the tank cars up and laid them on their sides on top of the empty barge that was brought up as well. We then sent the equipment back down the river, and when we got to Portland, we arranged to take the tank cars off of the barge, place them back on wheels, repair the safety appliances, the air brakes, etcetera, on the cars, and we shipped them off to their city.

My point in relating this to you is despite the hysteria and knowingly false information being promulgated by the opponents of this project, things did not always blow up and kill people.

In fact, I don't think there's been a death or much of an injury in the United States from the few derailed cars, and we ship over 500,000 tank cars of oil a year.

The only death toll was in Canada where 44 or so people lost their lives, and that was due to several gross rule violations by the engineer and the single employee on the train. Parking a train on a hill of such grade and duration that the train reached speeds in excess of 60 miles an hour before they got to the curve at the bottom of the hill in the town.

The locomotives made it around the corner, and then the tank cars started to derail. Subsequently, with the train still on the hill and still moving at 60, it caused a massive pileup and fire.

It should be noted that the town this occurred in is very isolated and relied upon propane gas for their heating, and the town was full of propane, outdoor propane tanks, which I believe contributed to the explosions and the damage.

And I'd just like this to be made aware so we don't all get caught up in the fear and hyperbole that's being promulgated to stop this project.

Thank you. P.S. This is approximately 1995, my name is Jon, J-O-N, Meyer, M-E-Y-E-R, phone number (360) 648-2395.

Response GP465-1

Comment acknowledged.

GP466, **Meyer, Jon**

Comment GP466-1

Name: Jon Meyer

Organization Name: 9 Johns River Ln

City: Aberdeen State: WA Zip 98520 Date: 11-25-15

Olympic Gateway Plaza Traffic

The trains currently are required to go 5 mph over the Wishka River Swing Bridge. Repairing this bridge to industry standards of 20 mph would allow a 1 mile long train to only black a crossing for 3 minutes. Installing lights and gates with minor crossing improvements would allow a "whistle free zone" to be approved by the F.R.A., which encourages this with financial aid.

Oil Spills or Explosions during Derailment

The wreck in Canada happened as a result of a flagrant rule violation, flawed corporate policy, and topography unique to the area. These do not exist here. The fear and hysteria over this incident has been dishonestly used by the groups opposed to this project, the official report issued by Canada's transport ministry shows that the engineer did not apply enough handbrakes, that fire department members put out a fire on the lead locomotive, that as a result of this the locomotive's engine was stopped, that this allowed the air brakes on the engines to become ineffective, and when this happened the unattended train rolled down a very steep hill that it had been parked on. The train was going over 60 mph when it went around an unbanked curve at the bottom. The engines and some cars made it around the curve, spreading the rail causing the following cars to derail with the rest of the train still on the hill pushing into the pile. This cannot happen here. Please do not allow the hyperbole deliberately fostered by opponents to influence your report.

Thanks,

J. Z. Meyer.

Response GP466-1

Comment acknowledged.

GP467, **Meyer, William**

Comment GP467-1

do not approve oil terminal expansion oil trains are not safe. they put our communities and rivers and the seafood industry at risk. the volatility of crude oil trains has already killed too many people...more trains will lead to more deaths, pollution in our towns, rivers and estuarys we should not be transporting fossil fuels this way...the risks far exceed the short term benefits bill and nadean meyer

Response GP467-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP468, **Michslek, David**

Comment GP468-1

I'm David Michslek, and I live in the blast zone. I want you to reflect what that really means. Not too long I only have two minutes. Last year there were 14 explosive train derailments in the United States. Fourteen.

If that happened while I was at home, I would die. If my family was at home, they would die as well. My house would be incinerated. I have to ask why is my life threatened? So some corporation can profit?

Enough is enough. You all have the ability and power to send a clear, unequivocal message to the United States and to the world that we are going to stop this madness and leave the oil in the ground.

Thank you.

Response GP468-1

Comment acknowledged.

GP469, **Milholland, David M. (Oregon Cultural Heritage Commission)**

Comment GP469-1

I have traveled up and down the Washington side of the Columbia River several times this summer, spending my money in riverside communities and appreciating the effort the state makes to keep its lands in top condition. This past weekend, during a visit to Horse Thief Lake State Park to visit our region's most iconic work of art, Tsagaglalal / "She who watches," the group of 18 I led stood less than 10 yards from a passing freight train [see attached images], which took nearly two minutes to pass. I had moved down the same corridor on an Amtrak train from Spokane to Portland only a month previous. What's exposed every time an oil train passes by such a vital location? One of our most fragile and productive watersheds, struggling to regain its primacy as a salmon corridor, at costs of billions of U.S. and state $$ to date. Even one spill of a multi-car oil train would cause decades of damage. Then there's the Native American art and a spectacular landscape, which draws millions from across the planet. Also the small riverside communities we visited including Maryhill and Lyle, where our visitor spending helps keep jobs and hope alive. Any jobs imagined or created by these projects must be seriously weighed against the health of the river and its human, animal, and plant inhabitants, as well as its physical beauty and the reputation of Washington in the world.

Not to speak of the heavyweight impact of thousands of oil cars would have on the rails and non-oil rail shipping vital to our region's economy. No fair reading of such a project trade-off can counterbalance the above-mentioned costs, especially if weighed in over long time. Horrifying

accidents happen, with greater frequency during the last few years. Much faster deterioration of the rail resource from such ongoing oil train impact is inevitable. Thank you for your consideration of these concerns. As a former Washington resident, I'm regularly drawn to your beautiful state. – David Milholland, President, Oregon Cultural Heritage Commission

See original attachment for photos of visit to Tsagaglalal

[Photos reviewed but not reproduced.]

Response GP469-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

GP470, **Miller, Bev**

Comment GP470-1

Subject: Westway and Imperium crude oil-by-rail terminal EISs

The following are my comments on the Draft Environmental Impact Statements (DEISs) for the oil-by-rail terminals proposed by Westway Terminal Company LLC and Imperium Terminal Services (now Renewable Energy Group) in Hoquiam, Washington. I must admit that I have not personally read the DEISs in their entirety, but I have skimmed them and have read what others are saying about their content. I do not understand why they needed to consume over 3000 pages! I also question their legality based on noncompliance with the State Environmental Protection Act (SEPA). WAC 197-11 requires that, "The EIS text shall not exceed seventy-five pages; except for proposals of unusual scope or complexity, where the EIS shall not exceed one hundred fifty pages." I suspect it may be an attempt by the City of Hoquiam and the Department of Ecology (co-lead agencies) to "baffle 'em with bullpucky!"

Response GP470-1

The length of the Draft EIS reflects the amount and complexity of information deemed adequate for the full disclosure of impacts. Due to the size, other materials such as the *Summary* and fact sheets were prepared to convey impacts in a condensed format. See response to previous comment regarding printed copies.

Comment GP470-2

The fact that printed copies of the DEISs were available at relatively few locations, it was cost prohibitive for most people to have copied, and many people do not have access to an electronic versions through the Internet may well have an impact on the number of comments upon which the final EISs are to be prepared.

Response GP470-2

Printed copies of the Draft EIS were available for review at the following locations: Washington State Department of Ecology, Lacey; City Hall, Hoquiam; Aberdeen Timberland Library, Aberdeen; Centralia Timberland Library, Centralia; Hoquiam Timberland Library, Hoquiam; Lacey Timberland Library, Lacey; Olympia Timberland Library, Olympia; McCleary Timberland Library, McCleary; and Ocean Shores Public Library, Ocean Shores.

Comment GP470-3

The DEISs are deficient and defective in many respects. First, the co-lead agencies invited members of the public, and various groups, agencies, and tribes to comment on what should be analyzed in the draft EISs and then failed to include at least 32 scoping comment letters submitted in the final scoping comment report that summarized input from the public. It is suspect to me that the comments of opponents of these projects were the ones omitted from the DEISs. The City of Hoquiam and the Department of Ecology need to go back to the drawing board and take into consideration all comments to the DEISs in their analysis.

Response GP470-3

The co-leads reviewed and considered all scoping comments. Final EIS Appendix A, *Scoping Comments*, provides a catalog of all written comments received during the formal scoping period.

Comment GP470-4

Because I am unable to determine whether or not my scoping comments, submitted May 27, 2014, were included in the final scoping comment report, here they are again:

> These are my comments regarding Environmental Impact Statements (EIS) for the two expansion projects proposed by Imperium Renewables and Westway at the Port of Grays Harbor, and also the oil storage and shipping facility being proposed by U.S. Development Group (to be built near the Grays Harbor National Wildlife Refuge at Bowerman Basin and Hoquiam High School) and their potential impacts to the community.
>
> 1. <u>We are not alone</u>! Personally, I don't know how the Washington State Department of Ecology and the City of Hoquiam can do any kind of environmental impact statement without taking into consideration the impacts these projects will undoubtedly have on other towns, cities and states from the point of origin of the crude oil to the terminals in Hoquiam. These projects don't just effect the citizens of our fair city. They effect everything along the routes they travel - business, people, animals, the environment. Are the Port of Grays Harbor and the City of Hoquiam actually willing to proceed with these projects without studying the potential impacts on others? These projects may increase revenues to the Port and Hoquiam, but will they in turn decrease revenues for others. It's like they are thumbing their collective noses at everyone else and saying that just because they want this to happen, it should happen, whether others are harmed in the process or not.
>
> Have studies been done of the infrastructure currently in place along the routes to determine if they are adequate? Are communities all along the routes equipped to handle catastrophic events such as spills, explosions, etc.? Has anyone asked them if they mind having several miles of tank cars full of explosive materials passing through their neighborhoods, thereby increasing the

danger of collisions with vehicles? - or people? - or animals? Would they mind if their property values decrease? What about the effects on trade and commerce? How would the increased traffic on the rail system and on our waterways affect other businesses/companies using those same means of transportation?

This may sound a little far-fetched to some, but what about the possibility of an increased risk of terrorism? A hundred tank cars filled with flammable/explosive materials could do some serious damage in the right location.

Response GP470-4

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment GP470-5

2. First they have to get it here! The two expansion projects alone would bring more than three trains through our communities each day. The wisdom of transporting that much oil from North Dakota in puncture-prone tank cars considered by experts to be mostly unsafe by rail industry standards, along poorly-maintained tracks and across bridges that were not built to withstand those types of loads, totally escapes me. These trains will be up to a mile and a half long, which most likely means they will cut off some areas of our cities, towns and neighborhoods from necessary emergency response for prolonged periods as they rumble along for over 1500 miles toward their final destination on land - Hoquiam. In some areas, railroad tracks that would be used to transport this oil to the Port are within mere feet of people's homes and businesses. In other areas, the trains travel within blocks of schools and hospitals.

While the Imperium and Westway projects are supposed to receive the bulk of their oil from North Dakota, when (not if) the international market demand is ripe, the crude by rail terminals in Hoquiam will become transshipment points for Canadian crude from Alberta's tar sands (the

second largest oil deposit on the planet). It's my understanding that this type of crude is even harder to handle.

The state of Washington should consider placing a moratorium on expansions of existing oil train facilities and to oppose new oil-by-rail transfer terminals until the safety of all oil train cars and the tracks they travel on are properly upgraded and regulated. What would happen if there were a derailment... or an explosion... or a spill? Our local first responders are wonderful at what they do, but there are simply too few of them and they do not have the tools nor are they trained to handle a crisis of that magnitude. Who would provide training? Who would take care of the cleanup/damages/recovery?

Response GP470-5

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. This includes the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. However, as noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources and destinations of crude oil shipped through the proposed facilities.

Comment GP470-6

3. Benefit to Hoquiam Marginal: We are all aware that jobs are needed, locally and across the nation. However, once the construction phase of these projects is concluded, the number of permanent jobs created locally would be minimal over all... especially compared to the jobs that would be lost if a disaster were to occur and our natural environment were threatened or destroyed.

Response GP470-6

Comment acknowledged.

Comment GP470-7

3. Impacts are many. A few examples of the impacts are: risks to the marine life and to the environment from oil spills/derailments/increased use of our waterways; risks to migratory bird habitats; potential risks to the health of our communities from increased diesel air emissions; decreased property values in areas where the trains travel and near where the storage tanks are to be located; potential risks for loss of life and property in the event of a catastrophic explosion; increased traffic impacts on some neighborhoods; risks to children

living along and going to school along the path of the trains and near the storage facilities; increased noise and air pollution; potential impact to tourism industry.

Our local communities are faced with the threat of earthquakes/tsunamis and the increased costs associated with insuring our properties, causing a decrease in property values. I can't help but think that oil terminals in our midst would further erode the investment that property owners have made in their homes, a sad ending to a lifetime of work.

When weighing the risks versus the rewards, the risks involved in these projects are too great and there appear to be few, if any, rewards. Most of us don't live here for the weather... we live here for the natural beauty, the natural resources, and the quality of life. Let's not allow oil companies to terminate that quality by placing their oil terminals in Grays Harbor.

Bev Miller
Hoquiam

Response GP470-7

Refer to the Master Response for Purpose and Focus of the EIS for a list of resources addressed in the EIS and a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action..Although no formal response to scoping comments is required under SEPA, scoping comments submitted electronically were presented in the Draft EIS as Appendix A, *Scoping Report*. The scoping report includes a reproduction of all comments submitted electronically. These and other comments received (e.g., by mail or orally at scoping meetings) were considered in determining the scope of the Draft EIS. Appendix A provides a catalog of all the comments that were received during the formal scoping period.

Comment GP470-8

In spite of their length, the DEISs fall short in many respects and appear to be riddled with inconsistencies, inaccuracies, and assumptions. The DEISs attempt to diminish the risks of catastrophic events by claiming the risks are "low."

<u>Oil train derailments, explosions, fires</u>: Even with all of the train derailments that have occurred over the past several years in other areas of the country, there are still some locals who believe derailments resulting in crude oil spills, fires or explosions couldn't happen here and that opposition to these proposals are from a few "environmental nutjobs." They fail to hear the voices of the scientists, seismologists, government officials, doctors, emergency responders and others who say these projects are a mistake. The DEISs only considered approximately 59 miles of the route to get the crud (oops! "crude") to Hoquiam. What about all of the folks along the way?

Grays Harbor has been lucky thus far. There were at least three derailments of trains carrying grain or other non-hazardous materials during the summer of 2014. I would be willing to bet the folks in Lac-Megantic, Quebec (July 6, 2013 - claiming 47 lives), Pikens County, AL (Nov. 8, 2013), Casselton, ND (Dec. 30, 2013), Philadelphia, PA (Jan. 20, 2014), Augusta, MISS (Jan. 31, 2014), Lynchburg, VA (April 30, 2014), LaSalle, CO (May 10, 2014), Mt. Carbon, WV (Feb. 16, 2015), and Galena, IL (March 5, 2015) were also told by oil and rail industry officials that the transport of crude oil through their communities and along their waterways was totally safe. After all, those industries have one goal in mind - getting the crude oil out of the ground and to its destination as quickly as possible, with the ultimate goal of increasing their profits, no matter what the cost to the communities through which

this hazardous material must travel. Donald Kunkle, executive director of the Pennsylvania First Emergency Services Institute noted that if an oil train derails, ruptures and explodes, much of the damage is already done before emergency responders even get the call.

US crude oil production rose by 3.2 million barrels per day between 2008 and 2013. In 2014, railroads carried 500,000 carloads of crude oil compared to 9,500 carloads in 2008 - a mere 6-years! Increased rail traffic results in increases in risk of derailment, spill, fire, explosion. The National Transportation Safety Board says "... changes to the North American energy landscape provide many more chances for fires, explosions and releases of flammable liquids...". The "push" to bring Baakan crude oil from North Dakota to the West Coast can be felt throughout the region. The oil companies are sniffing around various locations in Washington and Oregon for places to site new oil refineries. A Seattle-based nonprofit that focuses on sustainability issues (Sightline Institute, Seattle) reports that "In Oregon and Washington, 11 refineries and port terminals are being planned or built or are already operating oil-by-rail shipments." The proposed Tesoro-Savage oil terminal in Vancouver would receive approximately 120 oil trains per month. The Riverside Energy Inc. refinery being proposed for Longview would bring in approximately 1 unit train every three days (or about 10 unit trains per month). Locally, the proposed terminals alone would bring an additional two trains per day through our county.

Response GP470-8

Refer to Responses to Comments GP470-4 and GP470-5.

Comment GP470-9

Earthquake/tsunami: The DEISs are deficient in that inadequate attention was given to the very real threat of a major earthquake in the region and how these terminals would withstand such a catastrophic event.

Response GP470-9

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP470-10

My understanding is pilings for the storage tanks would be installed up to 150 feet deep, while bedrock in the proposed areas begin at 200 feet.

Response GP470-10

Piles would be driven to the depth of competent soils, which geotechnical investigations completed at the project site indicate is generally reached at 150 feet below-ground surface (Hart-Crowser 2013; as cited in Section 3.1, *Earth*). Refer to the Master Response for Seismic Risk and Design Requirements for more information about the iterative, ongoing risk assessment and design processes commensurate with the project's stage in development.

Comment GP470-11

Seismology experts who study the Cascadia subduction zone seem to agree the odds of "the big one" striking the area in the next 50 years are about 1 in 3 and the odds of a very big one (between 8.7 and 9.2) 1 in 10.

Response GP470-11

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

Comment GP470-12

Would the proposed tanks withstand violent shaking for two, three or even four minutes? It states on page 5 of the DEIS Executive Summary for the Westway Expansion Project that: "The risk of damage to the new facilities from an earthquake could increase potential impacts. Depending on the magnitude of the event, the new storage tanks could also become rupture [sic] and result in a leak of crude oil into the environment." The same grammatical error appears on page 6 of the Executive Summary of the Imperium proposal.

Response GP470-12

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP470-13

Regarding the risk of a tsunami, the DEIS stated, "...current design standards do not require consideration of tsunami risks." If not, why not? It goes on to state: "The project site is also in an area that has the potential to be inundated by tsunami waves."

Response GP470-13

Current building codes and applicable design standards do not address site-specific tsunami risks. For this reason, tsunami impact modeling and analysis (Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis*) were conducted to evaluated tsunami risks at the project site, including specific wave and debris forces.

Comment GP470-14

The final EISs for these projects need to better review the health risks, spill cleanup issues, global warming impacts of both Bakken crude and Alberta tar sands, noise and vibration issues, climate change, tourism, property values, effects of increased rail and vessel traffic, risks to the environment, etc.

Response GP470-14

Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses potential impacts from construction and routine operation of the proposed action. Increased risk of incidents (e.g., storage

tank failure, train derailments, vessel collisions) and potential consequences (e.g., release of crude oil) are addressed in Chapter 4, *Environmental Health and Safety*. Section 4.7, *Impacts on Resources*, describes the general types of impacts that could occur as a result of an oil spill, fire, or explosion, including impacts on human health. Final EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, address economic considerations, social policy implications, and the costs and benefits associated with the proposed action. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP470-15

In economically depressed areas such as ours, the desire for job creation can cloud our collective judgment. We feel a certain amount of "panic" because we fear the economic downturn of the communities that comprise Grays Harbor may not have reached bottom and, in our eagerness to attract new businesses to the area, we let that panic cloud our judgment. However, I firmly believe these projects are not a good fit for our communities. There are too many dangers - to the environment, fish and wildlife, the economy, the citizens, the next generation! Phrases repeated throughout the documents are "... cannot be fully mitigated..." and "... no mitigation measures can be implemented..."

Permits for these projects need to be denied! If these facilities are allowed to be built, the citizens in Grays Harbor would be taking all the risks while the oil companies would be raking in the profits.

I can't think of any additional comments that have not been made by other folks. The question is, who is listening?

Response GP470-15

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP471, **Miller, Dave**

Comment GP471-1

October 29, 2015

Please accept my comments below regarding this proposed project.

I live in Camas, Washington, within the "blast zone" of crude oil trains on the BNSF railroad. But my greater concern is for the wildlife and environment of the Columbia River Gorge, especially the Pierce National Wildlife Refuge.

Since 2006 I have been volunteering for the USFWS at the refuges in the gorge – Steigerwald Lake, Franz Lake, and Pierce National Wildlife Refuges. In my work at the Pierce refuge several years ago, I noticed on several occasions the carcasses of elk that had been killed by trains on the refuge. I was curious how often this occurs, so I got permission from the refuge manager to walk along the edge of

the railroad right of way with a GPS and camera, and document the carcasses. I have repeated this survey several times over the last few years.

I was fairly shocked by what I found. In the 2.5 miles of track that run through the Pierce refuge, I have found the remains of at least 50 animals killed by trains (the count was 47 when I made these charts in 2013):

See Original Attachment for Photographs & Graphs

I used the GPS to ensure I did not count the same carcass more than once.

The current train traffic is killing large numbers of wildlife now. This is unacceptable!

Over the last few years we have been absolutely bombarded with fossil fuel export proposals, each of which would exponentially increase the train traffic along the Washington side of the gorge, and in turn kill even greater numbers of wildlife at the Pierce refuge *and at all places where the tracks go through good wildlife habitat.*

Besides directly killing wildlife, increased fossil fuel train traffic will:

- Prevent animals from migrating across and down the tracks like they do currently (there are numerous game trails crossing the tracks). At some point very soon the tracks will become a 1200 mile barrier wall, because there will be a train on them most of the time. Think about the wildlife impacts of that.

- Make a nearly continuous deafening roar at the refuges. This will add stress to the wildlife, and disrupt their aural communications.

- Greatly increase diesel emissions.

- Greatly increase the risk of fossil fuel spills (it already drips onto the railroad bed), explosions, fires, etc. Think about the impact of a crude oil tank car derailment and explosion on a windy August day in the gorge. Such a fire would be impossible to extinguish.

- BNSF is also currently spraying herbicide into creeks along the railroad (see photos below). More trains probably means more herbicide along the tracks.

- Note that the cumulative effects of all these projects multiply the negatives of each project. You need to look at the effects of all the projects!!

I have several theories why so many animals are being killed by the trains. In all my visits to the Pierce refuge, I have only seen or heard of two animals being killed by cars on Hwy 14, which runs parallel to the tracks, while over 50 animals have been killed by trains. Obviously there is something different going on at the tracks vs. the highway. Here are my theories, based on my observations at Pierce:

- Elk and deer tend to be herding animals. If a herd is near (or on) the tracks when a train approaches, they may run across the tracks to safety. The last few animals may dash in front of the train to avoid becoming separated from the herd.

- Animals use the tracks as a travel path. I have seen evidence of this. When a train comes, their natural instinct is to outrun it, which they cannot do. The trains are traveling about 50mph through the Pierce refuge.

- There are a lot of trains hauling grain, and a lot of grain is spilled on the tracks (see photos). The grain attracts animals, especially during the winter. The animals are hit and killed by trains.

- An animal is killed on the tracks. Scavengers come to feed on the carcass and are also killed. This is probably why I have found dead turkey vultures and coyotes.

At the very least, you should require that appropriate wildlife over/under passes be built in areas where large numbers of wildlife are being killed.

Please examine the photos below, all taken at the Pierce NWR.

See Original Attachments for Photographs.

[Photos reviewed but not reproduced.]

Regards,

Dave Miller
Camas, WA
3509 NW 3rd Ave Camas, WA 98607 davem98607@yahoo.com

Response GP471-1

Final EIS Chapter 3, Section 3.5.5.2, *Proposed Action*, *Operations*, reflects additional information to address the potential habitat corridors along the existing rail corridor in the study area where there could be a higher risk of wildlife interaction with trains and mortality.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 further describes the potential risks associated with rail and vessel transport in this area. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP472, **Miller, Sharon**

Comment GP472-1

Please consider the short term planning that investing in the fossil fuel industry will establish in Grays Harbor. This unhealthy and dangerous industry does not have a long future as countries that the fuels are being exported to are now transitioning away from fossil fuels and are moving to renewables, as well. With the chance to invest in our future, why would we invest in regressive industries like these??

Response GP472-1

Comment acknowledged.

GP473, **Miller, Sharon**

Comment GP473-1

Please.....Deny this request and allow Grays Harbor to make room for sustainable and renewable energy industries.

Response GP473-1

Comment acknowledged.

GP474, **Miller, Sharon**

Comment GP474-1

Move away from fossil fuels ahead of federal requirements to do so. Let's be progressive!

Response GP474-1

Comment acknowledged.

GP475, **Miller, Sharon**

Comment GP475-1

Grays Harbor is known as a recreational area and making it an industrial center for fossil fuels will drive tourists from the area. They cannot afford this.

Response GP475-1

Comment acknowledged.

GP476, **Miller, Sharon**

Comment GP476-1

Hello. Thank you for hearing us today. You can tell that most of us communities -- my name is Sharon Miller, and I'm a resident of both Clark and King Counties. I commute to Vancouver between Seattle each week. I notice the 100-car oil trains that traverse our state paralleling I-5 and keep an eye on it because I know of the derailments.

I'd like to speak today to the statement of the DEIS that says, Although the likelihood of a large spill, fire, or explosion is low. I found that so hard to believe knowing of Lac-Megantic, Quebec where there were 47 deaths in 2013. And that train had 74, not 100 cars. The mayor of the city said that their city looked like a war zone.

But that was in Quebec. So I would like to read a statement from the Seattle Times from 1999. The series of explosions fueled by a ruptured gasoline pipeline rocked Bellingham, Washington Thursday sending a wall of flames racing along the creek and critically injuring two 10-year-old boys.

The explosion sent a plume of thick, black smoke billowing up 10,000 feet and darkened the sky and the city about 90 miles north of Seattle.

People close to it said it felt like an earthquake. Fires burned for hours after the explosion, damaging a house, and part of the water treatment plant, and destroying dozens of trees along the creek.

The boys had been playing near the creek in the city park at the time of the explosion and were taken to Harborview Hospital in Seattle where they were listed in critical condition with burns over 90 percent of their body.

Nearly 300,000 gallons of gasoline spilled in the creek and spread a mile through the city.

I think you should change your statement and say the risk is high.

Response GP476-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or within Grays Harbor, respectively. Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP477, **Mintkeski, Walt**

Comment GP477-1

To: Washington Department of Ecology and City of Hoquiam

I wish to comment on the DEIS's for Westway and Imperium oil terminal proposals. They must be substantially revised to fully disclose the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, vehicle delay at railroad crossings, and negative impacts on the Columbia River Gorge National Scenic Area. The indirect and cumulative environmental impacts from these projects will be significant and very difficult to mitigate.

Furthermore, the DEIS's failed to substantively address specific concerns related to the Columbia River Gorge National Scenic Area. This is inconsistent with the scenic area act, and it is illegal under the State Environmental Policy Act to ignore these impacts.

Some specific examples of this include:

The DEIS's fail to analyze the cumulative impacts to grade crossings from the proposal and other oil and coal export proposals, the likely need to construct additional sidings, overpasses, and second tracks, and the need for additional emergency response capacity along the entire rail route.

The DEIS's do not list the Columbia River Gorge National Scenic Area Act and Management Plan as an applicable regulation, despite the fact that the cumulative impact of additional oil train traffic would require new construction in the National Scenic Area.

The DEIS's fail to disclose the actual risk of an oil spill or explosive accident in the Gorge. The DEIS provided analysis of the risk of a spill or explosion near the facility where maximum speeds are limited to 25 mph. The DEIS's do not disclose the risk of spills and explosions in the Gorge, where the maximum speed is 50 mph for unit trains of oil and 60 mph for mixed-commodity trains with up to 34 oil tank cars dispersed throughout the entire train.

The DEIS's do not analyze the likelihood of a spill in the Columbia River along hundreds of miles of the BNSF rail line. Along with failing to analyze the likelihood of a spill, the DEIS's do not analyze safety impacts to local communities, environmental impacts to threatened and endangered salmon species in the Columbia River, and operational impacts on Columbia River Dams.

There is simply too much risk and too little reward from these proposals: Grays Harbor and rail-line communities would take on the risk and oil companies would reap the profits, while Grays Harbor and the Columbia River Gorge would become a through-way for oil going elsewhere.

The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line from Aberdeen to Chehalis, through the Columbia River Gorge, and all the way to the source of the oil in North Dakota and elsewhere.

There are better way to meet our energy demands. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our electricity needs and respond to global warming. Building more, large infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor. Washington state should continue to lead on safe, renewable, clean energy solutions and say no to more oil and coal. I urge you to do everything in your power to stop these dirty and dangerous projects.

I urge you to protect Grays Harbor, the Columbia River Gorge, and our communities by rejecting the proposed Westway and Imperium oil terminals.

Thank you, Walt Mintkeski 6815 SE 31st Ave Portland, OR 97202 mintkeski@juno.com

Response GP477-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that

could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

GP478, **Mizutani, Patricia**

Comment GP478-1

Based on the Draft Environmental Impact Statements (DEISs) which have been released for two proposed oil holding facilities in Grays Harbor County, I urge the Washington Department of Ecology and City of Hoquiam to reject the terminals. The DEIS has determined that the transport of the highly volatile Bakken crude oil to these terminals will be associated with air, land and marine pollution.

In the event of derailment, the spilled crude oil which has a blast zone of 1 mile could result in considerable loss of human life and property.

The length of the trains carrying the crude will lead to long delays at track crossings and could contribute to life threatening situations for very sick patients in emergency vehicles.

Being in the tsunami zone, the terminals will be highly vulnerable to damage since current design standards are inadequate. Please use the analysis and findings in the DEISs to reject these oil shipping terminals.

Response GP478-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP479, **Mohr, Brian**

Comment GP479-1

Dear Washington Department of Ecology and City of Hoquiam: The DEISs for Westway and Imperium oil terminal proposals must be substantially revised to fully disclose the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, vehicle delay at railroad crossings, and negative impacts on the Columbia River Gorge National Scenic Area. In reality, it is highly likely that the indirect and cumulative environmental impacts would be significant and impossible to mitigate.

Furthermore, the DEIS failed to substantively address the concerns raised by many environmental groups and individuals, in particular the specific concerns related to the Columbia River Gorge Environmental Policy Act to ignore these impacts.

Response GP479-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP480, **Moore, Dianna**

Comment GP480-1

I have thought long and hard about the best way to address my thoughts and feelings about the oil terminals on Grays Harbor, and the act of drilling or extracting oil from the earth in general. My ultimate conclusion is pretty simple; this earth is already showing the effects of human-caused pollution with more powerful storms, wildly fluctuating weather, and oceanside communities going under rising sea levels. So here we are, using methods destructive to the earth to extract a product we know does harm to humans, and all living things, and the environment, yet we justify it... because we need the jobs? I don't buy that for a minute! This is about money, power, and greed, pure and simple.

Response GP480-1

Comment acknowledged.

GP481, **Moore, Julia**

Comment GP481-1

My name is Julia Moore. I'm from Olympia, Washington, that's Thurston County. And I agree with all of the arguments that the people have brought today for why you should not approve these proposed terminals.

But I have a further request for you, and that is, it's not that I want Imperium and Westway to take their business somewhere else, because there is no other place to take unmitigatable energy-producing companies like that. We're all one globe. And that's like saying you can throw something away. There is no way.

What I'm asking you, and I'm not sure how this all works together -- but I want to ask you, to encourage you to ask companies to come here with alternative energy solutions. Put your money and your time and -- I mean, I'm a tax payer. I'm asking you to produce for me a better situation than you've given me so far. And I speak for millions of people who feel the same way.

Find us some alternative ways to run our economy, supply our energy, be creative, and be moral. Don't forget that that piece of it is just as important as the money.

And I speak for those who can't speak. The earth, mother earth, those green grassy hills that the children run through, and the seven generations of the future who aren't here who can't speak. Thank you.

Response GP481-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP482, **Moore, Julia**

Comment GP482-1

I'm Julia Moore. Our dependency on oil is like drug addiction. We're enslaved to a lifestyle built on unsustainable principles that rely on us to not look too close or think too hard about the harmful consequence of our choices. Addiction buries our goodness in denial.

Your fact sheets are good examples of denial. I was impressed with how they made bad things sound good and spun the off-the-charts high risk facts into palatable bites, helped with colorful photos and charts. I especially liked the chart that gives the impression that I could slide the dial and lower the risk.

Like an old snake oil ad, I became hypnotized by the fact writer's repetitive use of scary words like oil spill risk factor until the words lost their power. Is this your purpose? Do you hope we won't look too close, not think too hard about these horrific risks?

These are the tactics of drug pushers. It's how to do business as usual. What if we wanted to stop doing business as usual? How could we end this slavery that keeps us from following our goodness?

In recovery from addiction, one learns that the point is it's never between slavery and freedom. We must always choose between slavery and the unknown. That's the secret from getting off the addiction oil train. We must see that we're enslaved by notions of victimhood and entitlement.

To be free, you must be willing to sacrifice what is most familiar from what is most true. To be free we need to act on integrity, on trust sometimes for a long time. We must believe we can reclaim our capacity to know and live by the innate goodness in us to serve, and to belong to one another, and to life.

Response GP482-1

Comment acknowledged.

GP483, **Moore, Robin**

Comment GP483-1

Economic Questions for the DEIS of Imperium:

This also applies to Westway, and any other crude oil terminal projects to be built in Grays Harbor. As the financial benefit to the rails, storage, and shipping corporations is dependent on cumulative volume, the three crude oil projects MUST be considered, together.

Many people have chosen to grow old in Grays Harbor. Some are lifelong Harborites who never wanted to leave. Some came here purposely because of the quiet lifestyle and natural environment. I find living on a fixed income possible in this area. As the introduction to chapter 7 of the Imperium DEIS states, economic and social impacts must be addressed.

What would be the benefit of these crude oil projects to the many retired people who live here?

Response GP483-1

As discussed in Draft EIS Chapter 6, *Cumulative Impacts,* the cumulative analysis considers the combined effects of the Westway Expansion Project (proposed action), the REG (formerly Imperium Terminal Services) Expansion Project, and the Grays Harbor Rail Terminal Project. Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7.

Comment GP483-2

On page 7-7, in the paragraph before Table 7-7, it says: Essentially, all business taxes and net business income related to onsite operations and income earned by rail and vessel operators would leave Grays Harbor County and would not result in regional employment or income.

Grays Harbor has significant economic problems. One reason was over dependence on the timber industry. Yet, there are areas of growth. (Table 7.3) among which are health and social services. These are the sort of services that retired people need and the type that are largely supported by tax dollars.

If the taxes and income are leaving the Harbor, how is this a benefit to the retired population?

Response GP483-2

Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7.

GP484, **Moore, Robin**

Comment GP484-1

Questions for Westway DEIS regarding Study Area:

On page 3.0-2, the Draft EIS states the “study area is from Centralia to the project site.” As I read through the scoping comments, I saw people from Spokane, Idaho, and Montana voice concerns. Their communities will be exposed to the same risks of derailment, explosions, traffic, noise, air

pollution as those in the study area. Farming and ranching, which are dependent on rails, are already being hurt by the monopolization of the lines by coal and oil trains.

Grays Harbor is the destination for these petroleum products. It does not exist in isolation. Will the study area be expanded to include all communities impacted by the Westway project? Will the cumulative impact of all three crude oil projects be considered?

Response GP484-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP485, **Moore, Robin**

Comment GP485-1

In Table S-1 of the Westway DEIS, the third column is, "Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?" There were 14 No's and 17 Yes's. When mitigation measures are implemented, do they carry the power of law? Who or what agency is responsible for inspection to see if the mitigation is properly implemented? How often will inspections be done and with what degree of authority to fine or shut down operations?

Response GP485-1

Refer to the Master Response for Mitigation Framework for information on the enforcement of mitigation.

GP486, **Moore, Robin**

Comment GP486-1

This comment is regarding Chapter 3.9 Aesthetics, Light, and Glare. As both Westway and Imperium DEIS documents are nearly identical, and the light and glare from one facility cannot be separated from the other, they should be considered together.

It is not displeasing to see lighted buildings on a dark night. Aesthetically, it can be comforting. The buildings themselves have a gritty beauty. The whole of Port Dock Road has the feel of human progress.

Response GP486-1

Refer to the Master Response for Cumulative Impact Analysis.

Comment GP486-2

However, the area where the third oil terminal is planned is not industrialized to the same extent. The lights and glare would be jarring in that natural setting. It would have a very harmful effect on the birds and other wildlife. The expansion of Westway and Imperium bulk liquid storage facility would create a precedent for the creation of the third facility. They are not the same but cannot be considered in isolation. Whereas light and glare might not be significantly more noticeable with expansion of Westway and Imperium, it would have a very detrimental impact on the third proposed oil terminal. Is there any legitimate reason not to consider all three of these projects and their cumulative impacts as one whole?

I am not using the name of the third terminal because it has changed hands and names during this process.

Response GP486-2

Refer to the Master Response for Connected or Similar Actions.

Chapter 6, *Cumulative Impacts,* presents the analysis of the incremental addition of the proposed action to impacts from past, present, and reasonably foreseeable future actions—including the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Terminal Expansion Project. Cumulative impacts were analyzed only for those resources for which impacts of the proposed action were determined to be additive or cumulative. Impacts of the Grays Harbor Terminal Expansion Project or any other future project proposed at that site would be assessed as appropriate under that project's SEPA review process.

Comment GP486-3

Now Imperium has changed hands, and possibly names. How are the responsible parties to be identified? With the seeming instability of upper management, can any of them be trusted to follow through honestly and competently with any mitigation measures? Are you, our public officials, keeping a skeptical eye on the corporate maneuverings?

Response GP486-3

The comment is specific to the REG (formerly Imperium Terminal Services) Expansion Project and would be addressed in responses to comments as part of the Final EIS for that proposed project.

GP487, **Moore, Robin**

Comment GP487-1

Regarding the following from the Westway DEIS:

4.2.2.4: The applicant [Westway LLC]currently operates without Ecology oil spill plans because methanol does not fall under the definition of oil for Washington State.

4.2.2.5 Rail and Vessel Oil Spills Plans

PS&P does not currently transport oil in bulk and, therefore, does not have an oil spill response plan.

Response GP487-1

Draft EIS Chapter 4, Section 4.2.2, *What framework prepares for an incident?* describes the formal planning framework in place to address risks related to oil spills, fires, and explosions. Section 4.4, *Environmental Health Risks—Terminal (Onsite)*, includes a discussion of the existing risks and emergency planning and response capabilities specific to the existing methanol operations. Final EIS Section 4.2.2 has been revised to indicate that railroad operators would be required to develop spill contingency plans consistent with new state requirements.

Comment GP487-2

4.2.3.2 Spill Notification Requirements

Oil and hazardous substance spills must be reported under federal and state law. The spiller is always responsible for reporting a spill. Any spill that causes any of the following conditions must be reported to federal and state agencies and appropriate spill response actions must be taken.

One would hope that forward thinking corporations would exhibit their integrity by pre-planning for that which they know they will be responsible. Have Westway and Imperium developed their spill plans yet? Has PS&P developed a spill response plan? Have they shown responsible compliance with spill notification in the past? As the three proposed crude oil projects must be considered together, what is the spill plan and compliance history of the Terminal Three facility?

Response GP487-2

As noted in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, contingency plans are not required prior to operations and have not been developed. However, once contingency plans have been submitted to Ecology, they will be available for public review and comment for a period of 30 days consistent with WAC 173-186. Final EIS Section 4.2, has been revised to provide updated information regarding the state requirements for railroad operators to provide contingency plans and to demonstrate financial responsibility. Refer to the Master Response for Connected and Similar Actions for a discussion of how other projects are addressed in the EIS.

Comment GP487-3

Corporations have a habit of filing for bankruptcy after a major accident. Or they litigate for years before paying deserving parties. In light of the priority of corporations to provide profit for their shareholders, we the citizens of Grays Harbor must be proactive, using RCW 88.40 cited here.

From Appendix B of the Westway DEIS:

B.2.48 Transport of Petroleum Products – Financial

Responsibility (RCW 88.40)

RCW 88.40 defines and prescribes financial responsibility requirements for vessels that transport petroleum products across state waters and facilities that store, handle, or transfer oil or hazardous substances near navigable waters of the state. Tank vessels that transport oil in bulk as cargo may be required to demonstrate financial responsibility to pay $1,000,000,000.

Have any of the three proposed crude oil projects, PS&P, or any likely shipping companies shown the ability to secure one billion dollars to relieve damages of an accident or spill? Would one billion

be enough to compensate the community, tribes, fisheries, economic, and cultural institutions of Grays Harbor for their losses due to a spill or accident? What manner of enforcement is in place to ensure payment?

Response GP487-3

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP488, **Moore, Robin**

Comment GP488-1

Appendix O, Chapter 5 exposes the limitations of Imperium's fiscal analysis, and therefore any economic benefits to the region from any of these projects (underlining for emphasis):

IMPLAN estimates all other taxes including those incurred indirectly and through induced spending and employment. IMPLAN has only limited fidelity for taxes rates by industrial classification, asset classes and geography for these secondary effects, and the results should be seen as illustrative and not construed to be the detailed analysis of a tax professional. Cumulatively, state and local taxes, permits, and fees would be approximately $3.6 million in the first year of full operations.

Limitations of Input-Output Models

Like many quantitative tools, input-output models rely on a set of assumptions. The use of simplifying assumptions imposes certain limitations on the use of input-output modeling. These limitations should be fully understood and guide its use....

Input-output models have fixed production relationships, including the following assumptions:

- *Constant Returns to Scale* means that an industry's production function is linear, and an increase in output requires all inputs to increase proportionately.

- *Fixed Commodity Input Structure* means that input-output models do not allow changing input prices to affect the production decisions of businesses.

- *No Supply Constraints* means input-output models show how local industries respond to some initial change in final demand, but assume that supplies of raw materials and intermediate goods are unlimited.

- *Sector Homogeneity* means in input-output modeling, industry sectors are assumed to be homogenous. That is, all businesses within an industry sector 1) produce commodities in fixed proportions and 2) produce identical commodities that are perfectly substitutable.

It is appreciated that the DEIS includes these caveats. Are the co-lead agencies paying attention to them? The Department of Ecology and the City of Hoquiam are making life changing decisions based on "illustrations, simplified assumptions, and fixed production relationships." The Economic Impact Analysis is a year old. Already we see that those fixed production relationships have changed. Oil is a global commodity. The specifics of Hoquiam, the study area, and even the United States cannot be

taken in isolation. The co-leads must use information beyond the study and the DEIS that show the trend in decline of the oil industry. The "study area" should not be shackled to a dying industry. Who will be accountable for making decisions based on this self-identified flawed analysis?

Response GP488-1

The comment is specific to the REG (formerly Imperium Terminal Services) Expansion Project and would be addressed in responses to comments as part of the Final EIS for that proposed project. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP489, **Moore, Robin**

Comment GP489-1

[These comments are directed at all three proposed oil terminal projects. They are dependent on one another. They cannot be considered in isolation. The DEIS of both Westway and Imperium seem identical for section 3.10 except for the map indicating project site.]

The section on impacts to recreation describes the many parks, boat launches, and wild life viewing areas we have in Grays Harbor. In the first paragraph it says these bring in over a million dollars a year. This money is not in the hands of one or three corporations, but in the hands of many small businesses catering to tourists on yachts and kids who need a new a soccer ball.

One popular playfield is the Westend Park in Aberdeen. One edge has a short bit of vegetation between it and the rail lines. I have a friend who lives right next to the park. She is worried about the noise, smell, and shaking of her house that will come with increased rail traffic. But she is mostly worried about what could happen to the kids playing in the park should an accident happen.

Response GP489-1

Comment acknowledged.

Comment GP489-2

If these projects do not go forward we have the "No Action Alternative:"

3.10.5.1 No-Action Alternative

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

This implies you can't escape, another development for industrial use will come along, so give up now. My friend and I do not accept this as a reason to say "Yes" to these projects. We say draw the

line now. The mitigation measures are inadequate. There can be no compromise with our safety or the right to enjoy our recreation facilities. We demand corporate and governmental accountability. You must deny the permits. You must consider with fore thought the impacts of any future industrial uses for the Port.

Response GP489-2

The analysis of the no-action alternative does not assume that a future development similar to the proposed action would occur at the project site. Refer to the Master Response for Baseline and No-Action Alternative. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP489-3

Because there was no fore thought applied at the beginning of this process, how much time, energy, and money has it cost the people of Hoquiam, Grays Harbor, and Washington State?

Response GP489-3

A third-party contractor was hired to prepare the EIS. The City of Hoquiam administers the contract and the City and Washington State Department of Ecology oversee and direct the contractor's work. The cost of the analysis, document preparation, and public outreach activities are paid by the applicant.

GP490, **Moore, Robin**

Comment GP490-1

This is my own comment from the earlier EIS.

Organization:
Commenter: Robin Moore
Commenter Type: Public
Comment Excerpt Text:

The oil industry is an extraction economy, thus has a limited life span. I am concerned that the socioeconomic character of our community will suffer from these crude oil projects. Grays Harbor's established forestry and fishery industries are renewable. The intensity of the proposed crude oil projects will adversely impact the woods and the waters. Long term employment will be sacrificed. Family traditions will be lost. Why should these short lived projects be given permits to proceed when we will likely have another round of unemployment when the plants shut down? Can Imperium and Westway be compelled to provide adequate post-employment compensation for their workers?

I see nowhere in the DEIS that the issue of basing the future economy of Grays Harbor on this dubious commodity has been addressed. Nor do I see the concerns of the many Montanans who wrote in about the present impact that coal trains coming to the coast are making on their population. Such harmful impacts will only increase if more facilities are built in Washington.

Hoquiam does not exist apart from the rest of the state, nation, or world. The following is from the Hoquiam Municipal Code. It lays out the protections we give ourselves.

11.04.020 Purpose.

This chapter is intended to carry out the responsibilities imposed on the city of Hoquiam by the Shoreline Management Act of 1971. It is the policy of the city to provide for the management of the shorelines of the city by planning for and fostering all reasonable and appropriate uses. This policy is designed to provide for the development of these shorelines in a manner which will promote and enhance public interest. This policy contemplates protecting against adverse effects to the public health, the land, its vegetation, wildlife, and the waters of the state and their aquatic life, and incidental rights. The city council declares that the interest of all of the people are paramount in the management of shorelines of statewide significance. In adopting the guidelines for shorelines of statewide significance, the city council has given preference to the uses in the following order of preference which:

(1) Recognize and protect the statewide interest over local interest;

(2) Preserve the natural character of the shorelines;

(3) Result in long-term over short-term benefit;

(4) Protect the resources and ecology of the shorelines;

(5) Increase public access to publicly owned areas of the shorelines;

(6) Increase recreational opportunities for the public in the shorelines.

(7) Provide for any other element as defined in RCW 90.58.100 deemed appropriate or necessary.

Does the Department of Ecology take the long term, global aspects of these three oil terminal projects into consideration when making their final determination? Can the narrowness of the study area be set aside in an effort to avoid harmful impacts to the people of Montana, Idaho, Spokane, the Columbia Gorge, and all the little towns and burgs from North Dakota to Beijing? Can you deny the permits?

Response GP490-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for an explanation of the scope of the analysis of potential economic impacts in Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of the incremental addition of impacts from the proposed action to impacts from past, present, and reasonably foreseeable future actions—

including the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project. Refer to the Master Response for Cumulative Analysis for more information on the scope of this analysis.

GP491, **Moore, Robin**

Comment GP491-1

Comments regarding vessel traffic for the Westway and Imperium Expansion Projects

Vessel traffic from these two projects cannot be adequately studied without including the project proposed for Terminal 3.

Westway supposes an additional 238 trips per year, Imperium, 400. We might imagine Project 3 somewhere in the middle with 300 trips. This is a total of 938 ADDITIONAL vessel trips per year. In 2012, the total vessel trips were 281 (Table 3.17-7)

The No-Action Alternative expects vessel traffic to increase in 2017 to 338. That would be 1,376 vessels a year or at least three a day.

Is this at all realistic in this harbor with a narrow channel, hazardous crossing bar, and unpredictable weather?

Response GP491-1

Draft EIS Chapter 6, Section 6.5.6, *Vessel Traffic*, presents the analysis of the cumulative impacts associated with construction and operation of the three projects proposed for development at the Port of Grays Harbor: the proposed action, the REG (formerly Imperium Terminal Services) Expansion Project, and Grays Harbor Rail Terminal Project.

Comment GP491-2

Are there funds available for the extra tugs and pilots that will be needed? Is it realistic to expect mitigation measures involving escort tugs and “pretransit conferences” to be strictly followed when they will adversely impact profits?

Response GP491-2

As described in Draft EIS Chapter 3, Section 3.17.5.2, *Proposed Action*, tug and pilot capacity would not be exceeded under the proposed action. Implementation of applicant measures would be enforceable by the conditions of a permit, if issued by the City of Hoquiam.

GP492, **Moore, Robin**

Comment GP492-1

Comment concerning corporate decision making:

During the week of October 19, 2015, Westway Grays Harbor sent out large postcards to all postal recipients.

"We are seeking to expand our terminal operations, which will create more local family-wage jobs in Grays Harbor.

By supporting our project, you can help build a stronger future for our community."

The photos show a sunny and serene harbor. There is no information other than a website. If this were the first exposure to the intended expansion project, a person may very well think "Fine." Those of us who have been following the news know there is much more involved.

The postcards are indicators of how Westway makes decisions. They are a last minute effort to minimize the seriousness of the projects. Why would responsible business people decide to spend money in this way? They should be saving up for mitigation requirements and compensation payouts. Deny the permits.

Response GP492-1

Comment acknowledged.

GP493, **Moore, Robin**

Comment GP493-1

The purpose of the DEIS process is to discover potential hazards ways to mitigate those hazards with government regulation. Two examples, one internationally known, the other local, should suffice to show the disregard with which corporations treat regulations.

The BP oil spill in the Gulf of Mexico in 2010 is illustrative not only of what goes wrong when regulations are ignored, but how the largest and richest corporations avoid responsibility:

On 4 September 2014, U.S. District Judge Carl Barbier ruled BP was guilty of gross negligence and willful misconduct... Barbier ruled that BP had acted with "conscious disregard of known risks" and rejected BP's assertion that other parties were equally responsible for the oil spill. He described BP's actions as "reckless." and determined that several crucial BP decisions were "primarily driven by a desire to save time and money, rather than ensuring that the well was secure."

BP issued a statement strongly disagreeing with the finding, and saying the court's decision would be appealed. (Reuters, 2-23-13)

Right here in Grays Harbor we have an example of a well regarded company that provided jobs and built something very important for the state's infrastructure, which still could not bother to follow the regulations:

Kiewit-General Joint Venture, the state-hired contractor commissioned to build the SR 520 pontoon construction facility in Aberdeen, faces a $90,000 fine from the Department of Ecology for improperly decommissioning 15 groundwater monitoring wells at the site, according to a Thursday morning press release from the department. (The Daily World, 11-7-15)

Corporations large and small need to maximize profits for their shareholders. They do this by taking short cuts in labor and ignoring regulations. Past behavior predicts future behavior. Neither the Environmental Protective Agency, the Washington State Department of Ecology, nor the City of Hoquiam Municipal Code has the power to reverse this corporate habit. The risk of an oil spill in Grays Harbor is too great. We cannot afford the loss of habitat. We cannot afford the loss of jobs

dependent on that habitat. We cannot afford the escape from responsibility the corporations will take. We cannot afford years of litigation. For this most human and non-technical reason, the permits for all oil terminal projects proposed for Hoquiam must be denied.

Response GP493-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP494, **Moore, Robin**

Comment GP494-1

On this Thanksgiving Day, I want to thank you in advance for denying the permits.

Response GP494-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP495, **Moore, Robin**

Comment GP495-1

Last Chance Gulch

This is a "Comments Noted" comment. A software program could not see the passion, fear, or determination on the faces of the hundreds of people that spoke at the various hearings. If there is a live human reading this, you are important. You are not a computer chip. You have all the data at your finger tips. You also have an independent mind and heart.

The construction of three little oil terminals doesn't amount to a hill of beans in this crazy world. Except that they are three terminals in our part of the world and we have to take a stand. Please use all your wisdom and expertise to make a decision for long term wealth instead of short term pocket change. That wealth will be of more than the economic type, such as the lucrative fishing and tourist industries. That wealth will be that of preserving a community worth living in. You can do the right thing. You can deny the permits.

Response GP495-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP496, **Moore, Robin**

Comment GP496-1

Hello. My name is Robin Moore. I live in Hoquiam. I've lived there for 28 years. I too was a amazed to realize that you people had a sense of humor to have this meeting in the shadow of these coin towers. You know, Satsop doesn't get enough credit. It's the safest nuclear plant in the world. And

you people have the power to make these oil tanks the safest oil tanks in the world. Deny the permits. Thank you.

Response GP496-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP497, **Moore, Robin**

Comment GP497-1

Hello, my name is Robin Moore. I've lived in Hoquiam for 28 years. I'm addressing my comments to all three of the port terminals because I believe they need to be considered as a cumulative whole. So today we are in a theater, and we are all actors playing our parts. To permit or not to permit, that is the question, whether tis nobler in the minds to suffer the slings and arrows of a possible lawsuit, or to take up arms against the sea of disastrous environmental impacts and, by opposing, end them. Do not gamble with our future. Deny the permits.

Thank you.

Response GP497-1

Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of the incremental addition of impacts from the proposed action to impacts from past, present, and reasonably foreseeable future actions—including the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project. Refer to the Master Response for Cumulative Analysis for more information on the scope of this analysis. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP498, **Morabito, Joan**

Comment GP498-1

Tourism is the life's blood that keeps the City of Ocean Shores up and running. Ocean Shores attracts visitors because of the pristine beaches, waters, air and landscapes. It's all about the outdoor activities here that make our city a great place to visit and live. Living here year round has been my goal and I have achieved it a year ago. Ocean Shores is my new home and I am grateful every day to be living around such natural beauty. My two questions to you are as follows.

1.) No one comes to vacation in a disaster area. If Westway Terminal Company is granted permits for crude oil projects and that crude spills into our waters and on our land, how will Westway compensate the City of Ocean Shores for the loss of the revenue through tourism, that keep our city alive?

2.) I put my life's savings into my retirement home. If Westway Terminal Company is granted permits for crude oil projects and that crude spills into our waters and on our land, how will Westway compensate me, the individual homeowner, when my property value plummets? I feel the handling of crude oil here in Grays Harbor County will ONLY benefit Westway Terminal Company.

Inevitable spills and explosions will turn our county into a filthy, unhealthy, unsafe place to live or visit. PLEASE DENY THE PERMITS Sincerely, Joan Morabito Ocean Shores, WA

Response GP498-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP499, **Mossett, Kandi**

Comment GP499-1

In my hometown of New Town, ND life has forever changed because of fracking and the lust for oil; the horrible thing is that it's changed for the worse. This is no modern day Mayberry; this oil boom using fracking has been devastating for us and NO amount of money can ever give us back what's being lost. Many in our own communities have died because of accidents with the hundreds of trucks that have taken over the roads, our land is being sterilized our water poisoned and our air tainted and harder to breath. Our culture has taken a back seat to strangers populating the land, many with dark intentions. Rape of both men and women is on the rise along with things we've never dealt with before such as sex trafficking of young teenagers. Heroin abuse runs rampant as big city drug cartels move in and our once quite town of 1,500 is now a dangerous and scary place to be, let alone to raise a child.

My daughter is 15 months old and my heart aches that I do not even want her to be at home for fear of what she'd be exposed to. Murder is not a word we came across in our town before the oil boom, now we just wait for the next and the next as many have been murdered, yes murdered, in our little communities, much of it associated with the drugs and gangs that follow the money. Our own people are becoming addicts and need treatment but they continue to be arrested and sent to jail while the true perpetuators of the crimes keep slipping away only to bring more drugs, guns and crime.

I can't even begin to describe to you the heaviness in my heart having buried my brothers' beautiful 28 year old step daughter just a few weeks who could not stop using heroin which destroyed her body so much we had to have a closed casket. We found my little cousins body in the lake this spring; he disappeared last fall after last being seen with two known MS13 gang members. His death was ruled an accidental drowning and the case was open and shut. Just this past week two armed robberies occurred at two separate downtown businesses on our little main street.

Take these words that have been read here today and quadruple the horrors and maybe then, you might begin to get a sense of what's happening to us in our communities on Fort Berthold in North Dakota as a direct result of our countries addiction to fossil fuels and fracking. Its sick and its sad and I would never in my life wish this kind of horror on anyone else.

If you have a choice do what you can now to help stop this kind of devastation from spreading, we need help, will you help us? Do not support fracking, the social and environmental impacts from it are negatively life altering and those impacts are spreading across this country like a disease, please, from one compassionate human being to another, help us and do not support fracking. Mod-zi-gidaz (thank you).

Kandi Mossett is a member of the Mandan, Hidatsa, and Arikara Nations in North Dakota, and is the Native Energy & Climate Campaign Organizer with the Indigenous Environmental Network.

Comments apply to both projects

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Response GP499-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP500, **Murphy, Donna**

Comment GP500-1

There are better way to meet our energy demands. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our electricity needs and respond to global warming. Building more, large infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor. Washington state should continue to lead on safe, renewable, clean energy solutions and say no to more oil and coal. I urge you to do everything in your power to stop these dirty and dangerous projects.

Response GP500-1

Comment acknowledged.

GP501, **Murr, Bobbee**

Comment GP501-1

What effects will the pipeline installation have on marine habitat for all marine life, from mammals to plankton? How will any spills be cleaned up, and what will be the effects on life of spills. We need solar power, not more fossil fuel extraction, transport and combustion.

Response GP501-1

Draft EIS Chapter 3, Section 3.5.5.2, *Proposed Action*, describes the impacts on marine life, including impacts on mammals and plankton, from construction and routine operation of the proposed action, including pipeline installation and operation. This section also describes why minor spills and leaks from routine operations are anticipated to result in low impacts on animals as the result of exposure to contaminated stormwater.

GP502, **Murrell, Gary**

Comment GP502-1

How do we ensure that a company responsible for an oil spill or accident involving oil trains, rather than paying for making the community whole, simply declares bankruptcy and walks away? How

will we know that each project has purchased insurance to a dollar amount necessary to make the community whole after an oil spill or accident involving oil trains?

Response GP502-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP502-2

What specific plans do the railroads have for protecting the 6,000 children who go to school in the potential blast zone between Centralia and Hoquiam?

Response GP502-2

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP502-3

Specifically, how much would the cleanup from a major spill or accident cost?

Response GP502-3

Final EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, has been revised to include a discussion about the costs of recent oil spill incidents. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP502-4

Specifically, how much more delay time will motorists encounter if these projects are approved?

Response GP502-4

Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, describes impacts of the proposed action on rail traffic in the study area, including rail line capacity and train occupancy times at grade crossings. Section 3.16, *Vehicle Traffic and Safety*, describes the potential impacts of increased rail traffic on vehicle

traffic, including grade-crossing delay and queuing at nearby intersections. For detailed vehicle delay information, refer to Section 3.16.5.2, *Proposed Action*, and Appendix L, *Vehicle Traffic Analysis.*

Chapter 6, *Cumulative Impacts*, presents the analysis of the incremental addition of impacts from the proposed action to impacts from past, present, and reasonably foreseeable future actions—including the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project.

Comment GP502-5

How, specifically, do these projects plan to deal with sea lever rise due to global climate change?

Response GP502-5

Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts, Climate Change*, reflects clarification regarding predictions of sea level change in the project area and potential for flooding at the project site. With predicted sea level rise in the project area for 2050 of 1.57 feet, the project site will remain approximately 5 feet higher than the projected high tide. As such, it would not be subject to flooding even during extreme storm events.

Comment GP502-6

How does BNSF plan to mitigate the potential for accidents on sections of track that can not be secured to the ground?

Response GP502-6

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts, including those related to rail operations on the BNSF mainline to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action. For additional information regarding the development of mitigation in the EIS, refer to the Master Response for Mitigation Framework.

Comment GP502-7

How, specifically, will the health of community members be affected if these projects are approved? How do the proponents propose to mitigate the health risks to citizens?

Response GP502-7

The Draft EIS considers the following impacts related to human health. Final EIS sections have been revised, as noted below, to more fully describe these impacts.

- Chapter 3, Section 3.2, *Air*, describes potential impacts on air quality and the potential for increased cancer risk from emissions of diesel particulate matter related to construction and routine operation of the proposed action. The Final EIS section has been updated to reflect

revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analysis predicts lower emissions; the level of increased risk is not considered significant.

- Chapter 3, Section 3.7, *Noise*, describes potential impacts on sensitive receptors near the project site and transportation corridors from increased noise and vibration related to construction and routine operation of the proposed action.
- Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, describes potential impacts on public safety and emergency vehicle access from increased vehicle delay related to rail traffic from routine operation of the proposed action.
- Chapter 4, Section 4.7.1.7, *Human Health*, describes potential impacts of an oil spill on human health. The Final EIS section reflects a fuller description of these potential impacts.
- Chapter 4, Section 4.7.2.3, *Human Health*, describes potential impacts of a fire or explosion on human health. The Final EIS section reflects a fuller description of these potential impacts.

Comment GP502-8

Who will pay for a site cleanup in the event of a bankruptcy by one or all of the companies? How much exactly will a cleanup cost?

Response GP502-8

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP502-9

How will these projects affect endangered species?

Response GP502-9

Draft EIS Chapter 3, Section 3.5, *Animals*, addresses potential impacts of construction and routine operation of the proposed action on animals, including endangered species. Chapter 4, Section 4.7,

Impacts on Resources, describes impacts on animals that could occur in the event of an oil spill, fire, or explosion.

Comment GP502-10

How much will first responders in affected communities be delayed by trains? What compensation will the companies provide in the event of loss of life or property due to first responders being delayed by trains?

Response GP502-10

Section 3.16, *Vehicle Traffic and Safety*, describes the potential impacts of increased rail traffic on vehicle traffic, including grade-crossing delay and queuing at nearby intersections. The vehicle delay impacts in this section would also apply to emergency service responders. Refer to the Master Response for Mitigation Framework for an explanation of how mitigation measures were identified in the Draft EIS.

Comment GP502-11

How can these projects be approved when the EIS states quite clearly that the risks of oil spills during rail transport, at terminal sites, and during marine vessel transport through Grays Harbor cannot be fully mitigated? What is the probability of harm for the one million people wo live along the entire route of oil trains?

Response GP502-11

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP502-12

What adverse financial impact will established businesses encounter if these projects are approved? How will property values in Grays Harbor be affected by adopting these proposals?

Response GP502-12

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be

adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

GP503, **Murrell, Gary**

Comment GP503-1

My name is Gary Murrell. I'm history professor at Grays Harbor College, and I live in Hoquiam. I just handed these woman (indicating) 650 comment cards from citizens in this community who oppose this project. I have a question. What specific plans does the railroad have of protecting the children that go to school in the potential blast zone created by crematoria between Chehalis and Hoquiam? Our children's deaths cannot be mitigated and for this reason alone this project should be denied.

Response GP503-1

The Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, considered proximity of schools in its analysis of resource impacts that could affect the health and well-being of schoolchildren from construction and routine operation of the proposed action, including air quality (Section 3.2), noise and vibration (Section 3.7), hazardous materials (Section 3.14), and vehicle traffic and safety (Section 3.16). Draft EIS Section 3.2.4.3, *Sensitive Receptors,* lists all sensitive receptors, including schools, within 1 mile of the project site.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The general approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Section 4.7 clarifies that while impacts would depend on the circumstances of the incident, the resources described in Chapter 3 could be affected.

The analysis considers the effectiveness of existing regulations and proposes additional applicant mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the potential impacts of an incident at the terminal, along the PS&P rail line, or within Grays Harbor, respectively. Final EIS Section 4.2.2 has also been revised to indicate that railroad operators would be required to develop spill contingency plans consistent with state requirements and a mitigation measure is proposed for a contingency plan to be submitted to Ecology until state requirements are in place. Nonetheless, these measures would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

For information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework.

Comment GP503-2

How can we ensure a company responsible for an oil spill or accident involving an oil train rather than paying to make the community whole simply declares bankruptcy and simply walks away? Bankruptcy cannot be mitigated, therefore the project should be denied.

How will we know that each project has purchased insurance to a dollar amount necessary to make the community whole after an oil spill or accident involving oil trains? Is it possible to purchase enough insurance to pay for a major spill or accident? The lack of insurance cannot be mitigated and therefore these projects should be denied.

Response GP503-2

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP503-3

Since the EIS admits in several places that there are potential risks that can't be mitigated at all, why have these projects not been canceled already? Since there're no safe way to move oil by train, how can there be any mitigation for moving oil by train? How can the railroad mitigate the danger present in places where tracks cannot be secured to the earth?

We've got places on these tracks where the tracks cannot be secured because it's swampy, so the trains have to slow to five miles an hour and they can tip over. It can't be mitigated therefore the projects should be denied.

Response GP503-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP504, **Myhre, Rebecca**

Comment GP504-1

My comments relate to both the Westway and Imperium Draft EISs.

Oil refineries, oil train travel/transport and storage is dangerous to the local citizens, rivers, indigenous wild life, and our save environment. Oil companies have enough money to develop technologically, environmentally safe production procedures to produce oil and use it in ways that and environmentally safe; like renewable energy. Oil use is becoming antiquated.

The Columbia River is currently yielding pollution that is endangering all life; property, wild life, vegetation, and humans due to water and air pollution. If oil pollution [sic] is added to our already damaged environment, our Cowlitz River / Longview community will be a dangerous environment for growing families, crops, and drinking water. I already suffer from "leaky gut" and "irritated bowels" which started shortly after our drinking water was changed to a different water supply

source (Mint Farmwell) from the Cowlitz River. These two physical problems of mine are potential causes of may more serious medical issues. My needed life style changes are multiple, costly, and inconvenient. Thus, I focus on a cleaner environment. Please, reconsider this unwise opportunity. I have no choice to relocate as long as my special needs daughter is alive.

Response GP504-1

Comment acknowledged.

GP505, **Newsome, Dave**

Comment GP505-1

The Oil terminals should not be allowed in Grays Harbor. There is too much danger of spills and destruction of the Grays harbor Estuary.

Response GP505-1

Comment acknowledged.

GP506, **Nickell, Aaron**

Comment GP506-1

My name is Aaron Nickell. I am the former chair and co-founder of the City of Aberdeen Historic Preservation Commission and a former policy analyst at the Washington State Department of Commerce. I am a resident of Grays Harbor County and I am vehemently opposed to transporting crude oil through the Port of Grays Harbor. I do not believe that the Port of Grays Harbor, Westway, or Imperium can adequately predict nor mitigate potential natural disasters relating to oil transport. If oil terminals were built, an estimated 319 oil-laden tankers would need to traverse the shallow, narrow Grays Harbor shipping canal every year, increasing the chances of a disaster similar to the Exxon Valdeez spill. The Washington State Department of Fish and Wildlife has confirmed that Grays Harbor is "an area particularly sensitive to the adverse effects of oil spills." A major oil spill could devastate Grays Harbor's natural resource economy. The University of Washington estimates that more than 30% of Grays Harbor's workforce is dependent on marine resources jobs. Furthermore, an economic study by the Quinault Indian Nation found that an oil spill could put more than 150 tribal commercial fishermen out of a job, resulting in as much as $20 million in lost wages and up to $70 million in revenue. Grays Harbor sits in a major earthquake and tsunami zone. Geologists estimate the chance of a major Cascadia quake at 33% in the next 50 years; the chance of a very major earthquake is estimated at 10%. The proposed terminals could store up to 72 million gallons of oil – approximately 2526 oil tank cars – that could be rendered unstable during a major quake. Finally, oil trains are dangerous. At least 10 crude oil trains have exploded recently in North America, including a 2013 accident in Quebec that killed 47 people. A freight train derailed – on average – every 3.5 days from June 2011 to December 2013 in the Northwest. There is no safe way to move oil via rail. In 2013, more oil spilled from trains into rivers, lakes, and marine waters than in the past 40 years combined. Washington State and the Port of Grays Harbor need to be examining economic growth through confronting alternative energy needs such as solar and wind energy. We need to avoid crude oil transport in favor of developing high-tech industry cluster development as proposed by the Washington State Economic Development Commission in 2010: carbon fiber

precursor manufacturing, clean energy, cloud computing and data storage, healthcare, and a host of other burgeoning industries. I thank you for your consideration and hope Grays Harbor can move forward toward a progressive, healthy, clean economy. Building oil terminals at the Port of Grays Harbor is not worth risking our environment for a paltry number of jobs.

Response GP506-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 to reduce the likelihood of a spill reaching the environment and the potential impacts if an incident occurs at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP507, **Nightingale, Terry**

Comment GP507-1

I oppose both of these proposed projects to ship crude oil through Grays Harbor. The shipping channel is dangerous, and the risks both at sea and on the railroad are too great for wildlife, people, and the area's economy.

Speaking specifically to wildlife, the Grays Harbor area is home to six state-recognized Important Bird Ares (IBAs), including one of hemispheric significance. Put simply, Grays Harbor is an exceedingly poor choice of location for a crude oil terminal.

Response GP507-1

Comment acknowledged.

GP508, **Nobles, Carrie**

Comment GP508-1

I am completely opposed to the proposed oil-by-rail terminals in Grays Harbor, WA. The potentially explosive Bakken crude-oil trains serviced by these terminals would travel through, and directly threaten, the Columbia River Gorge National Scenic Area and the small towns contained therein. The risks to the region and its communities far outweigh any advantages of oil-by-rail terminals.

Response GP508-1

Comment acknowledged.

GP509, **Norgren, Tim**

Comment GP509-1

Hi. I'm Tim Norgren. I work through Laborers Local 737 in Portland, OR and live in Stevenson, WA. Stevenson is like a lot of rail-side towns in that most everything we have is near the tracks. The businesses, city buildings, elementary school, and many homes are within a quarter mile of them. The Port office and the volunteer Fire Dept. (all we have) are literally just a few feet away from the tracks as well. Our only firefighting equipment could be preemptively annihilated by a tanker explosion within the city limits, as is the case in Lyle, just upstream, and likely many other towns along the various routes. Even if our equipment survived to protect some of our homes it could do nothing to fight an oil fire.

Yet we can see the trains from our front windows as they fly through town at 50+ miles per hour, bouncing over the grade crossings as they go. The kids growing up in these towns often live their lives within the blast zone, more or less unaware of the danger they face from these fracked petroleum exports, much as some folks closer to the source may consider the higher cancer rates and dependence on bottled water to be a normal part of life. But this isn't normal, and it isn't sane. A tanker explosion along the Puget Sound or anywhere, could kill and maim a lot of people, and destroy homes and businesses either through a blast and shrapnel) or through wildfires. When this year's all-time record high temperatures became a record dry summer due to lack of snow-melt our state saw incredible fires even without a train explosion to ignite them! We were miles away, yet some days the smoke was thick enough that we stayed inside and considered the real and terrifying possibility that the forest around us could be next! Please consider the impact such an event would have on the lives of many people and creatures "upstream" from this terminal.

Response GP509-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Comment GP509-2

Also consider that on the downstream end this proposal would add profit motive to the extraction of more fossil carbon in a world already being ravaged by climate change, at a time when every scientist not on a profiteer's payroll is telling us we can't even afford to burn all the fuel that's been extracted and that we're fast approaching a few "feedback loops" of no return. And as a Building-Trades Worker I ask you to consider the proposal's ties to and support of globalization and the so called "free trade" agreements unilaterally opposed by unions and labor activists. While these agreements allow companies to outsource employment from countries like ours which consists of safe, living wage jobs in factories (exporting goods though our ports- out of terminals we build!) with substantial emissions and safety standards, to places with unregulated death trap factories and subsistence wages and NO EMISSIONS STANDARDS WHATSOEVER, the result is obviously not only a drastic increase in carbon emissions, water pollution, and the like at the endpoint of our exports, but also a reckless increase in pollution from shipping traffic in a system in which a product may cross the globe several times in various forms before even making it to market! Yet by allowing these terminals to be built we make polluting fuels cheap and easy to attain for those who see fit to exploit workers at every turn and dump their waste where they please. Please deny this proposal for the many reasons that it's harmful to so many along every stretch of this toxic material's journey! Thanks so much, Tim Norgrent_norgren@juno.com

Response GP509-2

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and for information on the likely destinations of crude oil shipped through the proposed facilities.

GP510, **Norton, Sonya**

Comment GP510-1

Here in Vancouver, we are fighting fossil fuel debarkment and fossil fuel train pass-through for the same reasons that you should not be contemplating facilities for them. the trains impede other traffic, are unsafe. a terminal increases community costs due to the necessity of providing local emergency services. the jobs of construction are not replaced by long-term jobs, since the terminal will be largely automated. reclamation of the area when the fossil fuel era is over will be long and exceedingly costly. you should be thinking beyond fossil fuels now, rather than destroying your town for a temporary flush of dollars. Sincerely, Sonya Norton

Response GP510-1

Refer to the Master Response for Purpose and Focus of the EIS.

GP511, **Nugent, Virginia**

Comment GP511-1

There are so many reasons to oppose these fossil fuel projects such as, toxic fumes polluting the air of near by neighborhoods,train derailment, explosive fires, defective tank cars, all threatening

communities and the Columbia River along the way. I am concerned about climate change and ocean acidification. If we are to save our planet for future generations, we absolutely must wean ourselves off of fossil fuels rather than building projects that will increase their usage. Ocean acidification and warming waters are threatening our fishing, and shell fish industries. Washington state's shell fish industry employs 3200 people and adds $270 million to our states economy. These fossil fuel projects pose a direct threat to our shellfish industry and our environment. Washington state is known for it's fish, shellfish and pristine natural beauty and wildlife. We must not let our state be turned into a fossil fuel state! Our past governor, Christine Gregoire, recognized the threat of ocean acidification to our shellfish industry and ordered Executive Order 12-07. It directs "all cabinet agencies that report to the Governor, to advocate for reductions in carbon dioxide emissions at a global, national and regional level." We cannot reduce emissions if these fossil fuel projects are approved. We must not ignore Governor C. Gregoire's Executive Order 12-07! Virginia Nugent 2600 NE 142nd St. Vancouver WA 98686 Phone-360-573-1672

Response GP511-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

GP512, **O'Connor, Jenny**

Comment GP512-1

Okay. My name is Jenny O'Connor. My background is that I worked for the City of San Francisco, Department of Public Works. And I worked there for 15 years. And during the period of time I worked there -- I worked there seven years, and out of that, we worked on a replacement project for the damaged freeway that was done. It was damaged in the 1989 Loma Prieta earthquake.

So I was working on the City side. I was a project manager so I worked with the federal government and state government. And we worked on environmental review. So I wanted to give that background just so you could put it into context that that's my background.

And so one point I want to make is there's a no-build alternative. So that's what I'm requesting, is that they vote for the no-build alternative. Because there are a couple of impacts that have come out of this report that are unmitigable. And if they're unmitigable due to the financial burden to mitigate them, then it shouldn't be built. We shouldn't have those impacts, the impacts of the noise and the impacts of how it's going to reduce traffic.

The increase in trains is really going to slow down traffic in the whole region. So those are the two reasons that I think they should consider not agreeing to do this.

Response GP512-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP512-2

The other thing is the cumulative impact. There are, I think, what? 28 fossil fuel projects that are being proposed in the region? And if any one of them, or several of them, are built, there are going to be all those other trains coming, in addition to the ones that are coming here.

So that compounds and that hasn't been considered in the environmental review process. So I I would say that if they're going to go back and look at more mitigation factors, they need to do a cumulative impact and consider the other projects that are being proposed in the region.

Response GP512-2

Chapter 6, *Cumulative Impacts*, presents the analysis of the incremental addition of impacts from the proposed action to impacts from past, present, and reasonably foreseeable future actions—including the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project. Refer to the Master Response for Connected or Similar Actions and the Master Response for Geographic Scope of the EIS.

Comment GP512-3

Okay. So that's -- boy. And the last thing I want to say is -- I'm going to read this; okay? And this is with regards to jobs; okay? Because that's a big thing. You know, that's a big thing for the town, is jobs. And I understand that.

I'm just going to read this. It says, The BlueGreen Alliance is part of a great turning away from fossil fuel domination to green energy independence. Here's something we can all cheer about. The Washington State Labor Council is sponsoring a state-wide initiative petition to put a cap on carbon pollution and raise revenue to transfer us to a green energy economy.

Instead of sending billions to out-of-state oil companies, we'll keep that money here at home, here in your own town. We'll create our own energy and jobs in the process. We can't do that if we lock ourselves into more dependence on fossil fuel.

So, thanks.

Response GP512-3

Comment acknowledged.

GP513, **O'Hanley, Kelly**

Comment GP513-1

My name is Dr. Kelly O'Hanley, and I'm a psychologist (obstetrician gynecologist) with Grays Harbor Public Health, and I've worked in 40 countries, and I have taught at Harvard and Stanford

Universities. I am affiliated with Oregon Physicians for Social Responsibility, and I will speak to greenhouse gas emissions.

First, the DEIS states that climate change would affect Washington state and the region by increasing the risk of wild fires, floods, and drought, changes in precipitation, increased temperatures, and ocean acidification. Climate change would contribute to sea levels rise. I would suggest the warning be changed to, Is already affecting Washington state.

Second, the report quantifies greenhouse gas emissions from operations and transportation per tank to be equipped to about 9,200 vehicles per year. For me, that is too much.

Response GP513-1

Comment acknowledged.

Comment GP513-2

Third, regarding end use, the DEIS states that whether the projects result in an increasing greenhouse gas emissions depends on speculative factors. Crude oil can only be transported to U.S. refineries with a limiting capacity by law. Therefore, this oil would simply replace oil currently used in U.S. refineries and there would be no net increase in emissions. Moreover, if facilities are not built, the product would simply be transferred to another facility. That's the report.

Be informed there may be a vote in the U.S. House tomorrow on a proposal to lift the ban on oil exports. Ever changing politics and markets is precisely why we must reject the assumption in the DEIS.

To conclude, the end use of these facilities would not increase greenhouse gas emissions is disingenuous and is an insult to our intelligence.

If we are honest and accept responsibility for our actions, we must say no to these projects, thereby we take a critical step to protecting ourselves from climate change, the single greatest merging threat to human health.

Thank you.

Kelly O'Hanley, MD, MPH * 6134 NE Alameda Street Portland, OR 97213 * kohanley@qmall.com * 503-88D-8844

Response GP513-2

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action.

Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, have been revised to include emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination as well as combustion of maximum throughput of crude oil. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

GP514, **Olson, Jean**

Comment GP514-1

Mayor of Hoquiam, Director of Ecology Maia Bellon, and Governor Inslee: As a Surfer and Birder, I value the importance of preserving recreational and wildlife viewing opportunities in Grays Harbor from the direct threat of an oil spill. I travel to the Grays Harbor area many times a year to recreate as do many of my friends in the birding and surfing community. The recent report by the Surfrider Foundation found that of the estimated 4.1 million annual trips to the Washington Coast, more than 1/3 of them were to Grays Harbor. Of the total $481 million spent in coastal areas, at least 150 million was spent in the Grays Harbor area. This money was spent supporting local businesses like hotel, restaurants, fishing charters and surf shops. Since oil companies cannot guarantee they will not spill oil. We cannot take the risk of losing the birds, fish, mammals and clean beaches to a spill. Haven't we learned from the BP spill and from all the rail car spills. According to the Washington Post in 2014 there were 141 "unintentional releases" (aka spills) from rail cars. I can't see why we would be lucky and not have a spill when so many other places have been unlucky. As a recreationalist that support small business and the local economy, I demand that small businesses and our neighbors and their customers be heard in the decision-making process. I also demand that you reject the permits for the Westway and Imperium oil terminals. Thank you.

Response GP514-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on recreation.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP515, **Opfer, Warren**

Comment GP515-1

Do not expand these terminals. Aberdeen's existing roads will be blocked by trains causing severe disruption of transportation. This affects business and truck drivers, forest products deliveries, UPS and FedEx deliveries, customers and staff who patronize and work business south of the rails. How

much less will log truck drivers make because their daily loads are reduced? Road blockage affects citizens who can't reach Riverfront Park, or can't get out of the park. Road blockage affects emergency services for health, fire and police. Increases in road blockage are highly probably as Congress will change the law to allow export of domestic crude. Ground transportation blockage is severe as proposed, and increases will cause severe hardship on Aberdeen's business and citizens.

Response GP515-1

Final EIS Chapter 3, Section 3.16.8, *Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?* clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and for information on the likely destinations of crude oil shipped through the proposed facilities.

GP516, **Opfer, Warren**

Comment GP516-1

Oppose expansion. Train noise is heard now at 5am. I live on the hill on the north side of town, well away from the rails, and the train horn and track/wheel noise is clearly heard and disrupts sleep.

Expanding the terminals and increasing the train traffic day and night reduces the quality of life for residents of Aberdeen. I oppose increasing train traffic. Once expanded, you can't go back and reduce the terminals. Once in place, the only way to reduce activity is it isn't economically feasible and the terminals shut down. If terminals are running, they keep running. You can't go back and say "we over reached".

It's a poor idea to place terminals with multi-millions gallons of oil in a tsunami zone. Better to have the tanks and rails out of the tsunami zone and pipe the oil to ships.

Terminals preclude Aberdeen's "clean" industries as the quality of life in a community attracts high tech business. Local tourism for Aberdeen would no longer be encouraged. Terminals and expanded train traffic discourage visitors from stopping in Aberdeen, but to "pass through and keep on going". Hopefully, no spills or catastrophes occur. But the negative affect on local Aberdeen business and residents is significant. I oppose expansion.

Response GP516-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP517, **Orgel, Linda**

Comment GP517-1

My name is Linda Orgel, Aberdeen. We came to Grays Harbor over 25 years ago because of its working harbor, natural resources and beauty. We support industries that will enhance the economy, not destroy it.

I'd like to speak about the inconsistency in projected jobs these projects are purported to create as stated in the DEIS.

For example:

In Vol. 1, Chapter 7, Economics, Social Policy, and Cost-Benefit Analysis: Westway reports on page 647 that there will be 36 direct jobs for onsite operations, but on page 672, they report estimates of 15 direct operational jobs.

In Vol. 1, Chapter 7, page 663, Imperium reports 103 direct jobs for onsite operations. On page 688, they estimate 15 direct operational jobs.

However in Vol. 3, there is also a discussion of impacts from vehicle traffic of employees with the proposed actions. Both proponents state: "It is assumed that for every one worker there would be one trip to and one trip from the project site." Therefore, the total vehicle trips are double the number of employees. (WW p. 252)

In the very next paragraph, under Onsite Operations, Westway states the proposed action would result in an additional 50 employee vehicle trips. (p. 253). Imperium states 30 employee vehicle trips. (p. 250)

Using their calculations, the number of employees would be one half the number of vehicle trips. Therefore, Westway would have 25 employees for onsite operations and Imperium would have 15.

These inconsistencies are found throughout both documents for both construction workers and onsite operations.

Since the proponents use job creation as propaganda for these projects to move forward and have been publicly exaggerating job numbers in excess of any numbers that are in the DEIS, it would seem to me a requirement for the EIS would be accuracy and consistency in reporting the true job numbers throughout the document. The economic cost in loss of fishing, tourism, real estate and local business because of crude oil, in comparison to real jobs created has not been adequately assessed.

The EIS should state:

1. What are the actual direct job numbers and positions for operation sand construction that would be a result of each of these projects?

2. What is the cost/benefit of whatever the number of project jobs might be versus the risk of a sustainable Grays Harbor economy?

Response GP517-1

As stated in Draft EIS Chapter 7, Section 7.1.4.2, *Proposed Action*, 36 direct jobs would be generated from terminal, rail, and vessel operations related to the proposed action. The reference to 15 jobs is in regards to the number of direct jobs that would be generated from terminal operations only.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comments specific to the REG (formerly Imperium Terminal Services) Expansion Project would be addressed in responses to comments as part of the Final EIS for that proposed project.

Comment GP517-2

Table L-6. Grade Crossing Infrastructure Projects Planned but Not Funded - No-Action Alternative (2017 and 2037)

Project Title: Tower Street Crossing
Year: 2017
Project Lead: WSDOT
Location: Tower Street grade crossing with the PS&P rail line in Centralia
Brief Description: Add early warning system and crossing gates. Construction anticipated being complete by 2015
Source: Stemkoski pers. comm.

Project Title: Pearl Street Crossing
Year: 2017
Project Lead: WSDOT
Location: Pearl Street grade crossing with the PS&P rail line in Centralia
Brief Description: Add early warning system and crossing gates. Construction anticipated being complete by 2015
Source: Stemkoski pers. comm.

Project Title: Devonshire Road Railroad Crossing Protection
Year: 2037
Project Lead: Grays Harbor County
Location: US 12 Milepost 7.09 to 7.10
Brief Description: Install concrete crossing, gates, and signs (currently flashers)
Source: Washington State Department of Transportation 2014b

Project Title: Glenn Road Railroad Crossing Closure
Year: 2037
Project Lead: Grays Harbor County
Location: US 12 milepost 0.0 to 0.2
Brief Description: Remove existing crossing and build new access road and cul-de-sac
Source: Washington State Department of Transportation 2014b

Project Title: Newman Creek Road Railroad Crossing Protection
Year: 2037
Project Lead: Grays Harbor County
Location: US 12 milepost 0.21 to 0.22
Brief Description: Install signs and gates (currently passive)
Source: Washington State Department of Transportation 2014b

Project Title: Calder Road Railroad Crossing Protection
Year: 2037
Project Lead: Grays Harbor County
Location: US 12 milepost 0.26 to 0.27
Brief Description: Install signs and gates (currently passive)
Source: Washington State Department of Transportation 2014b

Listed projects are currently planned projects that have not secured funding. These projects are listed under WSDOT's Six Year Transportation Improvement Plan for 2014 to 2019. These projects may or may not be funded after 2019.
WSDOT = Washington State Department of Transportation; PS&P = Puget Sound & Pacific Railroad

Impacts of the Proposed Action

This section describes the vehicle traffic and safety impacts that could occur in the study area as a result of construction and routine operation of the proposed action.

Construction

As described in Chapter 2, *Proposed Action and Alternatives*, construction of the proposed action could occur in two phases, with Phase 1 lasting 10 to 12 months and requiring approximately 86 workers and Phase 2 lasting approximately 10 months and requiring approximately 49 workers. It is assumed that for every one worker there would be one trip to and one trip from the project site, so 86 constructions workers during Phase 1 would create 172 vehicle trips. Additional vehicle trips to and from the site associated with this temporary increase in construction workers and the delivery of construction equipment and materials could also increase vehicle delays at intersections

Westway Expansion Project
Draft Environmental Impact Statement

[Table L-6 is repeated]

Impacts of the Proposed Action

This section describes the vehicle traffic and safety impacts that could occur in the study area as a result of construction and routine operation of the proposed action.

Construction

As described in Chapter 2, *Proposed Action and Alternatives*, construction of the proposed action could occur in two phases, with approximately 76 workers for Phase 1 and 34 more workers for Phase 2. It is assumed that for every one worker there would be one trip to and one trip from the project site, so 76 construction workers during Phase 1 would equal 152 vehicle trips. Additional vehicle trips to and from the site associated with this temporary increase in construction workers and the delivery of construction equipment and materials could also increase vehicle delays at

intersections surrounding the project site. However, the potential for additional construction-operations to and from the project site by rail and vessel operators. This amount does not include the value of the commodities (e.g., new bulk liquids) that would be shipped through the Port of Grays Harbor (Port), which, for this analysis, comprise pass-through costs with no economic impacts. The annual economic output includes annual operating costs of Imperium Terminal Services (applicant), PS&P, and vessel operators related to the proposed action, business taxes, and net business income.

Imperium Terminal Services Expansion Project

Draft Environmental Impact Statement

At full buildout, the proposed action would generate an estimated 103 direct jobs in Grays Harbor County associated with onsite operation of the proposed action (by the applicant), rail transport (by PS&P), and vessel transport (by vessel operators). The proposed action would generate an estimated 207 jobs throughout the County's economy. These jobs would account for $9.2 million in annual direct labor income and benefits, and $13.1 million in total annual labor income and benefits throughout the County's economy (Table 7-7).

The annual operating of the proposed facilities (by the applicant), rail transport (by PS&P), and vessel transport (by vessel operators) was estimated at $18.4 million. One-third of this spending ($4.5 million) would be attributed to the applicant, and the remaining two-thirds ($8.0 million) would be attributed to the rail and vessel transport operators. Of the total spending, $9.2 million (50%; Table 7-7) would be paid as income or benefits to employees and proprietors with the remainder going to non-labor expenditures.

The difference between the annual economic output and annual operating costs would consist primarily of business taxes and net business income. A substantial share of the applicant's net business income would probably be allocated to retire debt incurred during the construction phase. Essentially, all business taxes and net business income related to onsite operations and income earned by rail and vessel operators would leave Grays Harbor County and would not result in regional employment or income. The regional economic effects of operation of the proposed action are shown in Table 7-7, with income and output levels expressed in 2013 dollars per year.

Table 7-7. Estimated Economic Impacts in Grays Harbor County of Operations at Full Buildout - Proposed Action (2013 dollars)

Direct
Employment (Jobs): 103
Labor Income and Benefits: $9,169,000
Economic Output: $77,813,000

Indirect
Employment (Jobs): 60
Labor Income and Benefits: $2,416,000
Economic Output: $7,925,000

Induced
Employment (Jobs): 45
Labor Income and Benefits: $1,487,000
Economic Output: $5,051,000

Total
Employment (Jobs): 207
Labor Income and Benefits: $13,071,000
Economic Output: $90,789,000

Multiplier
Employment (Jobs): 2.01
Labor Income and Benefits: 1.42
Economic Output: 1.17

Source: Appendix O, *Census Block Group Data*
The multipliers for operation of the proposed action are smaller than those for construction primarily because the study area for operation is much smaller (Grays Harbor County) and the industries that would be most affected by operation are, on average, less labor-intensive and have lower wages.

In addition to these economic impacts, operation of the proposed action was estimated to generate $1.6 million in increased annual property, sales, and business and occupation tax revenues at full buildout (Table 7-8).

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Operations

The annual economic output of the proposed action in Grays Harbor County was estimated at $19.9 million (Table 7-7). This includes onsite operation of the proposed action and rail and vessel operations to and from the project site. This amount does not include the value of the commodities (e.g., crude oil) that would be shipped through the Port of Grays Harbor (Port), which, for this analysis, comprise pass-through costs with no economic impacts. The annual economic output includes annual operating costs of Westway Terminal Company LLC (applicant), PS&P, and vessel operators related to the proposed action, business taxes, and net business income.

At full buildout, the proposed action would generate an estimated 36 direct jobs in Grays Harbor County associated with onsite operations (by the applicant), rail transport (by PS&P, and vessel transport (by vessel operators). The proposed action would generate an estimated 73 jobs throughout the County's economy. These jobs would account for $3.6 million in annual direct labor income and benefits and $5.1 million in total labor income and benefits throughout the County's economy (Table 7-7).

The annual operating costs of the proposed facilities (by the applicant), and rail transport (by PS&P) and vessel transport (by vessel operators) related to the proposed action was estimated at $6.6 million. One-third of this spending ($2.2 million) would be attributed to the applicant, and two-thirds ($4.4 million) would be attributed to the rail and vessel transport operators. Of the total spending, $3.6 million (54.8%; Table 7-7) would be paid as income or benefits to employees and proprietors with the remainder going to non-labor expenditures.

The difference between the annual economic output and annual operating costs would consist primarily of business taxes and net business income. A substantial share of the applicant's net business income would probably be allocated to retire debt incurred during the construction phase. Essentially, all business taxes and net business income related to onsite operations and income

earned by rail and vessel operators would leave Grays Harbor County and would not result in regional employment or income. The regional economic effects of operation of the proposed action are shown in Table 7-7, with income and output levels expressed in 2013 dollars per year.

Table 7-7. Estimated Economic Impacts in Grays Harbor County of Operations at Full Buildout - Proposed Action (2013 dollars)

Direct
Employment (Jobs): 36
Labor Income and Benefits: $3,620,000
Economic Output: $19,942,000

Indirect
Employment (Jobs): 20
Labor Income and Benefits: $856,000
Economic Output: $2,961,000

Induced
Employment (Jobs): 17
Labor Income and Benefits: $574,000
Economic Output: $1,951,000

Total
Employment (Jobs): 73
Labor Income and Benefits: $5,051,000
Economic Output: $24,854,000

Multiplier
Employment (Jobs): 2.58
Labor Income and Benefits: 1.40
Economic Output: 1.25

Source: Appendix O, *Census Block Group Data*
The multipliers for operation of the proposed action are smaller than those for construction primarily because the study area for operation is much smaller (Grays Harbor County) and the industries that would be most affected by operation are, on average, less labor-intensive and have lower wages.

In addition to these economic impacts, operation of the proposed action was estimated to generate $1.27 million in increased annual property, sales, and business and occupation tax revenues at full buildout (Table 7-8).

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construction jobs are filled by construction workers that reside in Hoquiam (as assumed above), construction would generate an estimated $3.1 million to $3.6 million in labor income for construction workers residing in Hoquiam during both Phase 1 and Phase 2 of construction.

Additional labor income would be generated in Hoquiam, associated with indirect and induced jobs. CONorthwest estimates 283 indirect and induced jobs would be generated during construction (both Phases 1 and 2) in Washington State. It is not possible to infer from the ECONorthwest study

and from readily available data how many of these jobs would be likely to occur in Hoquiam. These jobs would average $53,500 in annual labor income per job (ECONorthwest 2014).

Operations

During operations, ECONorthwest (2014) estimated that 14 direct jobs would be supported at the terminal if only Phase 1 infrastructure were operational, and an additional 6 direct jobs would be supported at the terminal if both Phase 1 and Phase 2 infrastructure were operational. An additional 27 indirect and induced jobs (20 in Phase 1 and 7 in Phase 2) would be generated in Grays Harbor County, associated with the creation of the direct jobs at the project site. As noted in Section 7.1, Economics, additional direct, indirect, and induced employment in Grays Harbor County would be generated associated with vessel and rail transportation; however, it is anticipated that most of these jobs would occur outside the local communities. Although some rail and vessel jobs may be filled by residents of Hoquiam or Aberdeen, for the purposes of providing a conservative estimate, job creation associated with increased rail and vessel operations are not included.

Assuming all direct jobs in Grays Harbor County would be located in Hoquiam and Aberdeen (excluding vessel and rail transportation direct jobs), it is possible to estimate the number of operations jobs filled by workers who reside in Hoquiam. Assuming each job is filled by one worker, and using the same U.S. Census Bureau commuting pattern estimates used to analyze construction jobs, between 23 and 27% of direct operations workers would reside in Hoquiam. This would correspond to 4 to 5 workers (from a total of 20). A share of the indirect and induced employment could also occur in Hoquiam.

ECONorthwest (2014) estimated that each direct terminal job would pay approximately $65,000 a year in total compensation (wages and benefits). Under these assumption, total labor income in Hoquiam, supported by operational jobs directly linked to the proposed action, would correspond to between $ 260,000 (4 multiplied by $65,000) and $325,000 (5 multiplied by $65,000), assuming a full build-out (after Phase 1 and Phase 2 construction).

Additional labor income would be generated in Hoquiam, associated with indirect and induced jobs. ECONorthwest (2014) estimated that 105 indirect and induced jobs would be generated during operations (at full build-out) in Grays Harbor County. It is not possible to infer from the ECONorthwest study and from readily available data how many of these jobs would be likely to occur in the City of Hoquiam. These jobs would average $38,600 in annual labor income per job (ECONorthwest 2014).

Operations jobs would be permanent. Because permanent jobs generate income year after year, they are more likely to induce additional economic activity attracting businesses and local investment than temporary construction jobs.

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Operations

During operations, ECONorthwest (2014) estimated that 11 direct jobs would be supported at the terminal if only Phase 1 infrastructure were operational, and an additional 4 direct jobs would be supported at the terminal if both Phase 1 and Phase 2 infrastructure were operational. An additional 10 indirect and induced jobs (6 on Phase 1 and 4 in Phase 2) would be generated in Grays Harbor County, associated with the creation of the direct jobs at the project site. As noted in Section 7.1,

Economics, additional direct, indirect, and induced employment in Grays Harbor County would be associated with vessel and rail transportation; however, it is anticipated that most of these jobs would occur outside the local communities. Although some rail and vessel jobs may be filled by residents of Hoquiam or Aberdeen, for the purposes of providing a conservative estimate, job creation associated with increased rail and vessel operations are not included.

Assuming all direct jobs in Grays Harbor County would be located in Hoquiam and Aberdeen (excluding vessel and rail transportation direct jobs), it is possible to estimate the number of operations jobs filled by workers who reside in Hoquiam. Assuming each job is filled by one worker, and using the same U.S. Census Bureau commuting pattern estimates used to analyze construction jobs, between 23 and 27% of direct operations workers would reside in Hoquiam. This would correspond to 3 to 4 workers (from a total of 15). A share of the indirect and induced employment could also occur in Hoquiam.

ECONorthwest (2014) estimated that each direct onsite job would pay approximately $65,000 a year in total compensation (wages and benefits). Under this assumption, total labor income in Hoquiam, supported by operational jobs directly linked to the proposed action, would correspond to between $195,000 (3 multiplied by $65,000) and $260,000 (4 multiplied by $65,000), assuming a full build-out (after Phase 1 and Phase 2 construction).

Additional labor income would be generated in Hoquiam, associated with indirect and induced jobs. ECONorthwest (2014) estimates 37 indirect and induced jobs would be generated during operations (at full build-out) in Grays Harbor County. It is not possible to infer from the ECONorthwest study and from readily available data how many of these jobs would be likely to occur in Hoquiam. These jobs would average $38,600 in annual labor income per job (ECONorthwest 2014).

Operations jobs would be permanent. Because permanent jobs generate income year after year, they are more likely to induce additional economic activity attracting businesses and local investment than temporary construction jobs.

7.3.3.2 Fiscal Revenues to the City of Hoquiam

As discussed in Section 7.1.4.2, Proposed Action, in addition to generating increased employment and income, construction and routine operations of the proposed action would also result in increased fiscal revenues. As discussed below, it is possible to estimate the proportion of revenues that would likely accrue to the City of Hoquiam. Increased revenues would be generated by the property tax, sales tax, business and occupation tax, utility taxes, and building permits.

Property Tax and Leasehold Excise Tax

The Port is a public port and a taxing district. The use of public land and publicly owned property pays a leasehold tax to the Port in lieu of real estate property taxes. A portion of the leasehold tax is transferred to the city where the property is located. The tax rate for the city's portion of the

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Response GP517-2

Comment repeats text from the Draft EIS.

GP518, **Orgel, Linda**

Comment GP518-1

My name is Linda Orgel, and I live between Aberdeen and Westport. I just wanted to comment, a previous speaker talked about that (inaudible) and so on. And I wanted to make comments about rail.

Pasco to North Dakota, flat as a board. Huge explosion derailment. Aliceville, Alabama, flat as a board, huge derailment. Lynchburg, Virgina. (Inaudible), because they happen almost every month.

Seattle, Washington, five miles an hour under the Magnolia Bridge, an oil train tipped over. Thankfully nothing happened.

But the fact that we don't have hills here does not mean that (inaudible) is not going to happen. An evacuation zone of a half a mile is not enough. A half a mile is a vaporization zone, after that comes the fire and the heat.

So in your DEIS, your talking about evacuating a half a mile is not enough. I submit that these permits should be denied. Thank you.

Response GP518-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP519, **Orgel, Linda**

Comment GP519-1

My name is Linda Orgel. I live in Grays Harbor County. I'd like to speak about the inconsistencies and suggested jobs for these projects that's reported creative thinking in the DEIS.

For example, Volume I, Chapter 7, Westway reports on page 647 there will be 36 direct jobs for on-site operations; on page 672, they report 15 direct jobs. In Volume 1, Chapter 7, page 653, Imperium reports 103 direct jobs for on-site operations; on page 688 they estimate 15 direct jobs.

Response GP519-1

As stated in Draft EIS Chapter 7, Section 7.1.4.2, *Proposed Action*, 36 direct jobs would be generated from terminal, rail, and vessel operations. The reference to 15 jobs regards the number of direct jobs that would be generated from terminal operations only.

Comment GP519-2

Impacts from vehicle traffic of additional employees, both proponents think it is assumed that for everyone that works there, there will be one trip to and trip from the project site. Therefore the total vehicle trips are double the number of employees.

In the next paragraph Westway states the proposed action would result in additional 50 employee vehicle trips; Imperium says 30 vehicle trips. Using their calculations, the number of employees

would be one half of those. Therefore Westway would have 25 employees for on-site operations and Imperium would have 15. These inconsistencies are found throughout both documents for both construction workers and on-site operations.

Since the proponents whose job creation and propaganda for these projects to move forward have been publicly exaggerating job numbers and in excess of any numbers that are in the DEIS, it would seem to me a requirement for DEIS would be accuracy and consistency in reporting the true job numbers throughout the document.

Response GP519-2

The jobs numbers identified in Draft EIS Chapter 7, Section 7.1.4.2, *Proposed Action*, represent full-year equivalents. Employee vehicle trips identified in Draft EIS Section 3.16, *Vehicle Traffic and Safety*, are based on the number of employees anticipated to travel to and from the site each day on average. Each roundtrip does not represent a full-year equivalent job.

Comment GP519-3

The economic costs in loss of fishing, tourism, real estate, possible loss of lives because of crude oil in comparison to the real jobs created has not been adequately assessed. The DEIS should state what are the actual direct jobs and positions for operation and construction that would result from these projects and what is the cost benefit of whatever number of project jobs might be versus the risk for Grays Harbor economy.

Response GP519-3

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP520, **Parker, Camille**

Comment GP520-1

I am writing to submit my extreme opposition to any increase in oil train/tanker traffic going through Seattle and Grays Harbor. As a resident of Seattle who lives within blocks of the railway, and as the daughter of a resident of Ocean Shores, WA, I strongly urge you to cancel all plans for oil traffic expansion. Already, we see so many oil trains traveling this route. The underwater topography of Grays Harbor makes this a dangerous proposition and our Washington shores and maritime industries are too precious to put at risk. Please say NO to oil traffic expansion!! Sincerely, Camille Parker.

Response GP520-1

Comment acknowledged.

GP521, **Parks, Carrie**

Comment GP521-1

Please do not allow any oil terminals or expansion of any oil or gas terminals in Hoquiam or on the coast of Washington. I used to live out in that area, and still go to the coast every year as a tourist. I fell in love with the coast because it was beautiful and wild, and unspoiled. It's like that because it isn't polluted. Bringing oil, gas and coal through the area is wrong. It threatens our fishing industry, our agricultural exports, our wildlife, our tourist jobs. Don't do it.

See original attachment for photos

[Photos reviewed but not reproduced.]

Response GP521-1

Comment acknowledged.

GP522, **Parks, Carrie**

Comment GP522-1

The oil companies get their product out of the ground, but the oil, gas and coal are national resources that belong to all of us. They are not charged the true value of those natural resources. Then they want to transport it through our state, putting thousands of lives in danger so that a handful of executives can make money. If something goes wrong, they expect those of us who pay taxes to assume the cost of clean up and repair. I, as a tax payer, don't feel that I should be forced to assume huge risks for a dangerous product, nor those clean up costs for companies where the benefits are only going to a few people. The jobs that would be generated aren't worth it, and in fact, turning our most beautiful areas of the state into dirty, industrial ports full of pollution will drive away our clean industries and cause greater job loss. Who's going to want to go to the ocean for a weekend, just to look out on tanks, smoke stacks and oil spills? Who's going to buy fish, clams and crabs that have been living in a toxic stew full of oil products? Oil, gas and coal do not belong in the Pacific Northwest.

We should continue our focus on being a world leader in clean renewable technology.

Response GP522-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP523, **Parks, Carrie**

Comment GP523-1

I concur with what these kids are trying to do. We owe it to them to leave them a livable world that is free of toxic pollutants. There are many good points in this article that pertain to the Grays Harbor terminals. BREAKING: WA JUDGE RULES ATMOSPHERE A PUBLIC TRUST! WELC changes the climate game in huge case! A message from WELC Attorney Andrea Rodgers... Late last night, King County Superior Court Judge Hollis R. Hill affirmed, as we boldly asserted in our Washington youth climate change, that Washington state has a constitutional responsibility to protect the public's interest in a safe, protected climate. I've worked on this case for 18 months for free -- pro bono -- because I believe in the importance of changing the game on climate change. Yesterday's decision represents a huge step forward! Judge Hill said in her ruling that "if ever there were a time to recognize through action this right to preservation of a healthful and pleasant atmosphere, the time is now." Judge Hill's decision will set the stage for Washington state to develop strong climate rules to protect the right of youth and future generations.

What a great day for the climate, the kids, and Our Children's Trust, our partner in this work! Here are some powerful words from two of my clients: Youth petitioner Aji says: "This victory feels great but it is also tinged with disappointment. Why do we children have to fight for our lives? Why did it take this long for the government to acknowledge that they have the responsibility to protect my future and my generation's future? This cannot be an end but must be a beginning, because protecting our future and the futures and health of millions of other children is true justice." Youth petitioner Adonis says: "After all these years of fighting, this is our biggest victory yet, but with the joy that has sprouted from this victory so has determination -- determination to make this not the last victory but the first of many. This ruling affirms that companies do not have the right to destroy my generation's future and the futures of generations to come for the sake of money. As a child of this Earth I have rights. As children of this earth we have rights and those rights must be protected." Our strategic legal advocacy builds momentum for strong climate action on behalf of Washington's citizens and should help prevent the state from avoiding its constitutional responsibility to protect the climate by proposing half-measures. We must keep applying pressure, keep fighting, and keep using the power of the law to change the game on climate change. We hope you will stand with us in this fight! Stand with us as we fight for a habitable planet for future generations by making a donation to support our campaigns to protect the climate. Sincerely yours in this critical fight, Andrea Rodgers, Attorney Western Environmental Law Center

Response GP523-1

Comment acknowledged.

GP524, **Patton, Kathleen**

Comment GP524-1

As a citizen of Cowlitz County I object to these oil facilities because they bring more dangerous and polluting trains through our county.

I do not believe we should be exposed to the risks and clean up costs associated with spills or worse, explosions. I request that a thorough assessment of the state of the tracks in our State be fully

assessed and the complete costs to the state and the citizens of derailment and explosion be calculated and made public.

Response GP524-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

GP525, **Patton, Kathleen**

Comment GP525-1

I have to follow the tall guys. Good evening. I'm the Reverend Kathleen Patton, and I'm an Episcopal priest from Longview in Cowlitz County, Washington.

There are a lot of ways of talking the value and cost to a community of a project like this, but I cannot imagine how any economic benefit of bringing oil by rail can be weighed against the threat to safety and the potential for a catastrophic spill.

But I'm here to raise another aspect of this conversation. I want us all to consider this from a moral angle. For me there are a number of pressing concerns. Obviously there's the safety of all those along the rails in places that experience no benefit whatsoever from the risks that this terminal exposes them to. And I'm thinking of people all along the Columbia Gorge and the town of Kelso, which is our next-door neighbor, and Washougal, where there are schools located directly on those tracks.

Beyond that, I believe that this EIS fails to consider the carbon footprint of this project. After a season of horrific fires and horrendous droughts throughout the west, we can see that climate change is now impacting our citizens directly, their health and their economies.

How can we imagine that allowing big oil to exploit our state and increase profit at the expense of every person and all life forms on the entire planet is an acceptable decision.

When does it become time to stand up and say that's enough. That's enough.

Is that it?

Response GP525-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident. As noted, mitigation would not

completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

GP526, **Paulson, Lauri**

Comment GP526-1

My name is Lauri Paulson and I live in Aberdeen. I came here not expecting to speak and I was going to listen, but I feel compelled to speak. Others have spoken today and for me to repeat them is a waste of our time.

I moved to this area over a decade ago. I had the option to live anywhere I wanted and I chose Grays Harbor because of the natural beauty of this region. Our miles of coastline and beaches and wetland are irreplaceable. People come here to dig for our clams and watch the shorebirds. Oil spills and train derailments do happen and if there is a spill of crude oil it would destroy this beauty and destroy its population of shorebirds.

We have tourist traffic. On our busiest weekends, tourist traffic would be impacted by the increased amount of rail traffic, which would affect our economy. Also Aberdeen is in a blast zone, including the main access into and out of our communities, and goes along the entire business district, groceries, shopping. The benefits of jobs of our communities outweigh the risk of the transportation of crude, and I urge you to deny the permits.

Response GP526-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

GP527, **Paynter, Mary**

Comment GP527-1

The Draft EISs note that the probabilities of significant oil spills, train derailments, and explosions are very low, but also acknowledge that should these unlikely events occur, the environmental damage would be severe. There is no mitigation that can address ruined beaches, destruction of

wildlife habitat, and loss of livelihoods in the commercial fishing and shellfish industries, recreation, and tourism. We have only to look at events such as the BP oil spill and the many recent train derailments and explosions to see that accidents do happen, and when they do, the result is lasting devastation.

Response GP527-1

Comment acknowledged.

Comment GP527-2

If the alternative to these proposed projects were that Americans would freeze in the dark due to lack of fossil fuels, that would be one thing—maybe the risks would be worth taking. But these projects are not designed to meet America's energy needs. Instead, they are intended to enrich the fossil fuel industry by exporting petroleum products to Asian markets.

Furthermore, the resulting pollution and greenhouse gases, once the products are consumed in Asia, affect all of us by degrading the air worldwide and contributing to climate change. It is my fervent hope that permits will not be granted for these projects.

Response GP527-2

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP528, **Paynter, Mary**

Comment GP528-1

Hi, my name is Mary Paynter. I'm a native of Washington. When I was a little girl my family lived across the street from a trail that led to the beach, and this was in southwest Seattle, and the neighborhood. We spent a lot of time down there swimming, beachcombing, playing follow the leader on the logs. One day a sign showed up in the water and said P-O-L-L-U-T-E-D.

We were shocked to learn this meant we couldn't swim in the water, we couldn't dig the clams and the geoducks. And our neighborhood beach had become dirty and contaminated. Our family didn't depend on that beach for food or livelihood, but still it was shocking.

Recently I was talking with a member of the Lummi Nation. And this is his story. The beaches where we used to dig for clams are now covered in coal dust. Again, pretty shocking.

As I read through the DEIS for these Grays Harbor projects, I felt the same kind of shock that I experienced as a little girl when I saw that sign as I felt as an older woman too as his story of the Lummi Nation.

The DEIS had characterized the probability of the spill or some kind of accident as small. But if it happens, it will be devastating. Mitigation cannot address it, as many people have said. There is no mitigation that can cover destruction as a result of the loss of livelihoods -- people, and the amount of fish, shellfish, tourism, and recreation.

Response GP528-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP528-2

Now, maybe, maybe, this will be justifiable if Americans were freezing and in the dark. But we are not. All indications are these projects will not do one thing to support our energy. Please deny them.

Response GP528-2

Refer to Response to Comment GP527-2.

GP529, **Pelly, Mike**

Comment GP529-1

Name: Mike Pelly
Organization Name (if applicable):
City: Olympia State: WA Zip: 98502

Grays Harbor County does not need to endanger its ecology or economy by taking the unnessisary risks of allowing itself to be used by the oil industry. This is a boom and bust proposition. 10 years from now the oil industry will have morphed into something completely different from what it is today. Greys Harbor County does not need to take the risk -> (more on other side) or enabling the oil industry to have a major spill in her backyard of bay.

Think of the big picture and do as other municipalities have been doing. Say No! to dirty oil trains and oil terminals. You sleep with dirty dogs you are bound to end up with fleas.

Tourism is the most viable future for GH County. Please don't louse up this opportunity by enabling the oil companies to do here what they have done to Alaska's Prince William Sound or to the coastline in the Gulf of Mexico.

Those oil trains are <u>not</u> the answer, they are simply means to destroy some of the best things about GH County. Don't be fools to Big OiL! They really don't give a rip about the citizens of G.H. County.

Response GP529-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP530, **Pelo, Ann**

Comment GP530-1

My name is Ann Pelo, P-E-L-O, and I live in Montesano. And the thing about running trains through, they have a track record of failing, and they have a track record of causing decimation of a land.

It's moving backwards in terms of our -- I'm thinking about energy resources rather than moving forward.

So I'm just here to say, no, this is wrong and bad and needs to stop. We need to put our energy into something that is going to be life creating and sustainable in the long haul. That's all.

Response GP530-1

Comment acknowledged.

GP531, **Pennant, Sandie**

Comment GP531-1

I do not want this oil permit to be granted here in our small town. My largest fear is that the train tracks will never be safe enough. I highly doubt that the railways will ever spend enough money (and nobody seems to be able to force them) to make us (and our beautiful town) completely safe from trains derailing. Of course I am worried about our waterways in regards to birds and fish also, but derailments and explosions are my biggest concern.

Response GP531-1

Comment acknowledged.

GP532, **Penry, Marlene**

Comment GP532-1

In Section 3.16 you state that traffic along the US 101 and US 12 corridors between Aberdeen and Hoquiam is becoming more congested due to growth at the Port of Grays Harbor, and that you calculated annual average daily traffic for existing year, 2017, and 2037 for this DEIS. You also use "Peak Hour" to determine vehicle delays. Did any of these calculations area? All of this traffic flows through the study area. Did "Peak Hour" take into consideration that due to tourist traffic, peak volume is just as likely, if not more likely, to occur on a weekend than a weekday? If the North Beach was not considered in Section 3.16, it needs to be rewritten with those figures taken into consideration.

Response GP532-1

Draft EIS Section 3.16.3, *How were impacts on vehicle traffic and safety evaluated?* explains that peak hour was assumed to be 11.5% of the annual average daily traffic based on available traffic count data which includes weekend and weekday traffic. Therefore, the annual average daily traffic data includes tourism traffic because it is the annual average daily traffic for all days in a year. The analysis does not represent the absolute worst peak hour in the year.

GP533, **Penry, Marlene**

Comment GP533-1

Westway and Imperium Terminal Services Expansion Projects EISs

Section 3.15 indicates the PS&P rail line crosses 55 bridges, all crossing water. It states the FRA never inspects bridges unless a problem is reported. It states PS&P has made 7 bridge repairs and the 20 year plan is to upgrade 3 bridges. That doesn't sound like much.

1) Has PS&P inspected all of these bridges? Where are the inspection reports?

2) It also indicates "where feasible, physical tracks were inspected."

Why is it not feasible to inspect all of the tracks? Where is the report of the inspection and testing that was done? All of these reports must be made available to the public.

There have been three derailments on these tracks in the past few years.

Where are the investigation reports for those accidents? Have the problems that caused those derailments been fixed?

It is unacceptable to allow these permits to carry crude oil by rail until PS&P has inspected all 55 bridges, all 59 miles of track, the inspection reports have been made public, and all repairs have been made to the satisfaction of the FRA.

Page 3- 15.11 states "For about 1,000 feet at a point about 4 miles west of Montesano, the speed limit is 10 mph. The track is on the bank of the Chehalis River. The soil condition is such that maintenance to the tolerance required for 25 mph speed limit is difficult."

So, the proposal is to send extremely heavy mile-long trains carrying explosive oil multiple times a day over unstable soil along a major river. Why is that an acceptable risk?

It is not an acceptable risk. Deny these permits.

Response GP533-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless,

compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP534, **Penry, Marlene**

Comment GP534-1

From Section 6.5.6.3 Cumulative Impact mitigation measures: "To reduce potential risk of incident of vessel collision while in Grays Harbor, the vessel management system will take the following actions. Ensure vessel traffic is limited while a laden tank vessel is in the navigation channel. Prohibit the transit of any other deep-draft vessels within the south channel (just off Westport) to Terminal 1 in both directions whenever a laden tank vessel is transiting within the same channel." This appears to mean that oil vessels would have priority in the navigation channel. I do not see where the impact of this on other Port companies has been addressed. 1.) Have the other Port tenants been involved in the preparation of this section? Have they agreed to these limitations? The impact of these projects on other Port businesses must be adequately addressed.

Response GP534-1

The referenced applicant mitigation measure proposes that the applicant coordinate with the Port of Grays Harbor and other stakeholders. It does not and cannot require that priority be given to tank vessels.

Comment GP534-2

2.) These documents all refer to 2017-2037 estimates and calculations. Did they use a Port of Grays Harbor 20-year plan? Is there such a thing? Will this priority use limit or discourage future Port customers? This has happened with oil train priority usage and put other rail-dependent companies out of business. Deny these permits until the Port of Grays Harbor has presented their 20-year plan for a diversified port. No port company or industry should be allowed to dominate or monopolize the use of Grays Harbor. We need a diversified economy.

Response GP534-2

Draft EIS Chapter 3, Section 3.17.3, *How were impacts on vessel traffic evaluated?* provides information sources and methods used to evaluate the capacity of the channel. The Draft EIS presents an analysis of impacts related to construction and operation of the proposed action; it does not propose priority use of the port by a particular project or commodity.

GP535, **Penry, Marlene**

Comment GP535-1

Section 4.3.1.2 makes it obvious that so little is known about what will happen to diluted bitumen in water that it cannot be possible to model it or create an oil spill response and cleanup plan for it. It would "initially" float; it will submerge or sink in "hours or days." Oil that sinks is "harder to recover." Table 3.14-4 states it "floats, submerges and/or sinks". Well, what else could it do? It is certainly too heavy to evaporate, so it is a complete unknown. It is also stated that each shipment of dilbit can be different based on the diluents used, which make up 30% of the volume and are typically very toxic. All of these different shipments are mixed in the terminal tanks, and then put on a vessel. How is it possible to know what kind of hazardous chemicals (diluents) are involved in a dilbit spill, how to handle them safely, and if they can ever be recovered from the environment? What does "harder to recover" mean? Is there a recovery plan to clean up sunken dilbit? How is there any way of cleaning oil off the bottom without removing all living things with it? Sunken dilbit left in the environment will obviously have severe adverse impacts to all marine life that grows, lives, or eats on the bottom of the harbor. There are no mitigation measures to deal with sunken dilbit. Recovery time for the environment and fisheries is a complete unknown, but surely to be years or decades. How can this risk be justified?

Response GP535-1

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

GP536, **Penry, Marlene**

Comment GP536-1

Westway and Imperium Terminal Services Expansion Projects EISs

According to the Washington State Department of Fish and Wildlife, "Grays Harbor is an area particularly sensitive to the adverse effects of oil spills." The environmental impacts are astounding.

The Grays Harbor National Wildlife Refuge is a stopover resting and feeding place for hundreds of thousands of shorebirds during spring and fall migration. It is also one of four Shorebird Sites of Hemispheric Importance.

In addition to the Refuge, Figure 3.4-2 shows the following preserved natural areas in Grays Harbor:

Natural Area Preserves (NAP)
- Chehalis River Surge Plain
- Goose Island
- North Bay
- Sand Island
- Whitcomb Flats

Wildlife and Recreation Areas
- Johns River
- Ocean Shores
- Oyhut

Additional Sites
- Damon Point
- Elk River Natural Resource Conservation Area

The Risk Assessment Appendix M grossly underestimates the likelihood of accidents and spills in Grays Harbor, but even at the once every 45 years stated, it is too much. There is still environmental damage left from the Exxon Valdez spill 26 years ago. It will take only one spill to have a severe impact on the harbor, and as stated 23 times in Chapters 4 through 7: "…nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill."

Oil transport through Grays Harbor is an unacceptable risk. There are no mitigation measures. How can you justify proceeding with these projects? The risks to life, property, livelihoods, and environment far outweigh the number of jobs, which in itself is a doubtful number, but significantly less than the jobs that will be lost.

Response GP536-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

GP537, **Penry, Marlene**

Comment GP537-1

Section 3.17 Vessel Traffic, section 3.17.4.4 states "The Port's tenants and vessel agents are responsible for providing safe and operationally reliable vessels" How often are inspections made? Who sets the parameters of the inspections? Who gets the results of inspections? Are the reports available to the public? Where is the accountability to the Port?

Response GP537-1

Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*, describes the systems that are in place to manage vessel traffic in Grays Harbor safely. Final EIS Section 3.17.4.4 provides additional information.

GP538, **Penry, Marlene**

Comment GP538-1

Ocean Shores, and the ocean beach communities as a whole, are largely ignored in the DEISs. Although the DEISs mention the 1989 Nestucca spill at the bar and its impact on Ocean Shores, they do not model a spill outside the jetties. In Table 4.1-1, all vessel spills are wisely considered Large for the likelihood of environmental impact. Oiled beaches would have huge impacts on wildlife, environment, public health, tourism, real estate, property values, quality of life, and economy. Oil spills getting outside the harbor, under the influence of two tide cycles a day, will continue to bring oil and dead and dying wildlife back onto the beach. Historical efforts show the majority of oiled seabirds will die. A spill in the worst-case scenario of king tides and a winter storm would bring oil far enough onto land to reach dune vegetation, and it would take years for the environment to recover to its natural state. The DEISs must be updated to reflect all environmental and socioeconomic impacts to the ocean beach communities.

Response GP538-1

Draft EIS Appendix N, *Oil Spill Modeling*, acknowledges the limitations of the model to depict the movement of oil outside Grays Harbor. The appendix and Chapter 4, *Environmental Health and Safety*, state that depending on the circumstance of an incident, it is possible for oil to move outside the harbor and up or down the coast. Attachment A in Appendix M provides information about two historical vessel incidents, including the Nestucca spill referenced in the comment. For more information about the limitations of the model, refer to the Master Response for Oil Spill Modeling Methods.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP539, **Penry, Marlene**

Comment GP539-1

Section 4.2.1.1 states that one step taken to prevent oil from reaching the environment during transfers is that facility operators are required to ensure that all personnel are appropriately trained. However, Section 3.17.4.2 states that vessel operators (owned, operated or chartered) contract with a stevedore (longshoreman) to handle the vessel side of the operations during vessel loading and unloading. What kind of training requirements can be imposed on a contract worker used by any vessel operator using the oil terminals? What good does it do to train the operator on one end of the pipe if the operator on the other end is untrained?

Response GP539-1

Draft EIS Chapter 4, Section 4.4.3, *What mitigation measures would reduce potential impacts related to terminal operations at the project site*? includes an applicant mitigation measure proposing that the facility person-in-charge (certified facility operator for oil transfers) verify that all connections are properly functioning for each oil transfer prior to the commencement of a transfer. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources,* describes the types of impacts that could occur in the event of an oil spill, fire, or explosion.

GP540, **Penry, Marlene**

Comment GP540-1

Humans and the Grays Harbor Environment

Section 3.3 Water States that surface waters provide natural beauty and sustain the health of human communities. Section 3.4 Plants states there are psychological benefits of the environment for humans.

Section 3.5 Animals states wildlife diversity supports various aspects of the local culture.

Many more of the sections of Chapter 3 make similar statements about the interrelationship between humans and the Grays Harbor environment.

The significance of this is that the quality of life, daily life, in Grays Harbor County, the reason people move here and live here, is significantly tied to the physical environment. The loss of this quality of life thus has a very significant negative impact, not just a “perception” as noted in Chapter 7.

With one significant spill, people who live here will lose this crucial, healthy connection to the environment, will lose their quality of life for years. How do you measure the cost of this psychological impact?

How do you measure the cost of the psychological impact of cleaning oiled birds and watching dead and dying oiled wildlife wash up on shore? How do you measure the psychological impact of

knowing that the lesser number of shorebirds migrating one year means hundreds of thousands of birds have died of starvation because they couldn't feed in Grays Harbor one spring?

Chapter 7 notes socioeconomic "perceptions" of increased risks could cause some individuals "concern" and that the projects could cause the "perception" that communities are unsafe or unhealthy. These are not perceptions, they are facts. How do you measure the cost of the psychological impact of worrying every day that your house or your child's school could burn down as every train passes, or your source of drinking water could be contaminated or the air you breathe could become toxic?

How do you measure the costs of these intangible, psychological impacts to the people of Grays Harbor County? Why aren't psychological concerns addressed as public health impacts? How can they be mitigated? They cannot be ignored.

Response GP540-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP541, **Penry, Marlene**

Comment GP541-1

In Section 3.17, the only mitigation measure for tsunamis is an emergency evacuation plan. Evacuation of whom, from where? All coastal communities are active in tsunami readiness activities, and with lessons learned from the nuclear plant disaster in the Japan tsunami, these terminals must be built to withstand a CSZ earthquake and tsunami. Why is there no mitigation for on-site loaded trains or docked laden ships spilling oil into the harbor due to earthquakes or tsunamis?

Response GP541-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

GP542, **Penry, Marlene**

Comment GP542-1

Chapter 4 Environmental Health and Safety (spills, fires, explosions) states economic and social factors will be addressed in Chapter 7. However, Chapter 7 states the socioeconomic study is

required by the City of Hoquiam and is focused primarily on their resources. The only Environmental Health and Safety cost in the Cost/Benefit Analysis (Table 7-13, p 7-40) is training the Hoquiam Fire Department, and even that does not have an estimated cost. The cost of spills, explosions, or fires is not included as a cost as they are unpredictable and depend on a variety of factors. They are not even listed as a line item with no estimated cost. The Appendix O economic study covers only benefits, not costs. The costs to all other communities in Grays Harbor are not addressed, not even the direct costs of first responder training. Why did the economic study not look at costs? Why did it not look at the entire study area of the projects? The DEIS does not contain an adequate or accurate economic study and thus is unacceptable.

Response GP542-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP543, **Penry, Marlene**

Comment GP543-1

Per Table 3.14-4, each shipment of dilbit can have a different diluent. How does the terminal operator know what hazardous materials are being handled, what safety measures to use, and what cleanup measures to employ if there is a spill onsite? How is it known if it is safe to mix the contents of multiple shipments with different diluents together in one tank? Could different diluents combine for different chemical reactions? Potential explosions?

Response GP543-1

Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, describes the regulatory requirements applicable to handling, storage, and transport of crude oil. Operation of the proposed facility would comply with these requirements to minimize the risk of incidents related to storage. Additionally, Section 4.5, *Environmental Health Risks—Rail Transport*, includes a mitigation measure to improve the safe transport of crude oils with different volatilities and sinking tendencies, which states the applicant will not accept crude oil by rail unless the applicant has received verification that a sample of the oil has been tested and properly classified and characterized.

GP544, **Penry, Marlene**

Comment GP544-1

Nothing in the DEIS oil spill scenarios indicates that due to the high volatility of Bakken crude, a vessel collision could be more than a spill, it could be an explosion. Does the response plan cover this possibility? Could the oil stay on fire on the water? Could it come ashore on fire? With its low flashpoint, could Bakken oil that reaches shore catch on fire, for example from cars driving on the beach, people tossing cigarette butts into oiled dune grass,etc.?

Response GP544-1

Draft EIS Chapter 4, Section 4.6.2.2, *Fires or Explosions*, acknowledges the potential for fires or explosions during vessel transport.

Comment GP544-2

Are first responders of all Grays Harbor communities going to be trained how to handle both Bakken and dilbit spills as they reach shore? Who pays for the necessary training and equipment?

Response GP544-2

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

GP545, **Penry, Marlene**

Comment GP545-1

Section 3.5 Animals, specifically Marine Mammals

1.) The DEIS fails to identify the Dall's Porpoises resident in the harbor. How does the increased number of vessels impact this species?

2.) The DEIS states the greatest potential for whale vessel strikes is outside state waters because most large whales migrate and forage in deeper waters. It is beyond belief that the DEIS does not mention and consider the annual Gray Whale migration. This migration is heaviest in March and April and consists of females and their young calves. They are generally within a mile or less of shore and can often be seen from the shore. There is also a fall migration, although it is not as concentrated and is further away from shore. How do these projects impact this migration and what mitigation will be enacted?

Response GP545-1

Final EIS Chapter 3, Section 3.5.4.3, *Grays Harbor,* reflects additional information to address the common porpoise and dolphin species found in Grays Harbor, including Dall's porpoise, and to clarify whale use of Grays Harbor, including frequent use by the gray whale. Draft EIS Section 3.5.5.2, *Proposed Action*, addresses potential vessel collisions with marine mammals. Final EIS Section 3.5.5.2 clarifies that marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a higher risk from vessel strikes. However, the potential for vessel strikes in the study area would be only slightly greater compared with the no-action alternative.

Comment GP545-2

3.) The DEIS states increased vessel traffic related to the proposed action would generate increased underwater noise that could affect aquatic animals, especially marine mammals. Figure 3.5.1 compares vessel noise frequency and marine animal hearing ranges. The text then has several sentences describing killer whale clicks, whistles and calls that are at a much higher range than the vessel noises and thus they will not be impacted. Since most of the marine mammals listed as present in the study area are baleen whales, with hearing frequencies that overlap the vessel noise range, why are they not discussed? What is the impact on those species? With such obvious omissions as these made, what other species and impacts on marine mammals might have been missed?

Response GP545-2

The potential underwater vessel noise impacts on marine organisms, which would include baleen whales, are found in the bulleted list of impacts after Draft EIS Chapter 3, Section 3.5, *Animals*, Figure 3.5-1. The range of physical and behavioral response impacts include behavioral reactions, masking, temporary threshold shifts, permanent threshold shifts, and nonauditory physiological effects.

GP546, **Penry, Marlene**

Comment GP546-1

This is an update of an earlier comment on this section, which I am not sure got through. Section 6.5.6.2 Navigation Channel Capacity Table 6-18 shows the number of estimated annual vessel trips in 2017 and 2037. It estimates growth from 2017-2037 only for commodity shipping in the harbor. It is unclear whether this is based only on the current tenants of the Port, or if it takes into consideration the growth of the Port with new tenants.

Response GP546-1

Draft EIS Chapter 3, Section 3.17.3, *How were impacts on vessel traffic evaluated?* provides information sources and methods used to evaluate the capacity of the channel.

Comment GP546-2

However, the estimates do not project any growth, any increase in throughput, of crude oil for Westway, Imperium, or Grays Harbor Rail Terminal for the next 20 years. Do these three companies truly have static 20-year business plans or are the DEISs written that way to minimize the cumulative impacts? Can we expect another application for more throughput, another SEPA, DEIS,

and permitting process in a few years? These DEIS's already state 23 times in Chapters 4-7: "However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, fire, or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion." These DEIS's already propose unacceptable levels of environmental and economic risks. Are we to believe that if these terminals are constructed that the oil companies will not push to increase throughput, continue to increase impacts and risks, until that devastating spill, fire, or explosion happens? It is clear that these projects and companies should not be permitted a foothold in Grays Harbor.

Response GP546-2

As noted in the Master Response for Project Objectives and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant. Draft EIS Chapter 2, *Proposed Action and Alternatives*, describes the type of material and approximate volumes to be transported based on this information. The City of Hoquiam will specify maximum throughput in the conditions of a shoreline development permit. The City of Hoquiam will specify maximum throughput in the conditions of a shoreline development permit. In addition, other permit approvals could identify the maximum allowable (permitted) throughput of the facility. Any increase in annual throughput capacity would require revised or new permits or plans.

GP547, **Penry, Marlene**

Comment GP547-1

STUDY AREA ISSUES

Study areas west of the terminal site are unclear, inconsistent, and inadequate throughout the DEISs.

There are three distinct study areas defined in Chapters 3 and 4. For purposes of illustration, I will call them A, B, and C.

A.) The most often used study area, it is described as "through Grays Harbor out to 3 nautical miles from the mouth of the harbor." (1) What does "through" mean? Is it just the navigation channel or the entire harbor including islands and shorelines? Some individual sections make that more clear in the details of the text, but it is not apparent to the reader in the answer to the "What is the study area?" question at the start of each section. Is "out to 3 nautical miles" just a box of sorts out from the mouth of the harbor? (See below for discussion of "mouth.")

B.) "Vessel transport through Grays Harbor." Again, what does "through" mean and (2) where does Grays Harbor end?

C.) "The entirety of Grays Harbor, including the navigation channel into and out of the harbor out to 3 nautical miles from the mouth of the harbor." (Section, 3.17 Vessel Traffic only)

Despite what the answer to the Study Area question is up front, some text, figures, and footnotes within the sections refer to areas that are outside of that stated study area. Some examples of this are shown below, but another issue must be addressed first.

The Mouth of the Harbor

(3) Where is the mouth of the harbor? There is no consistent definition of its location. One might suppose it is an imaginary line drawn between the western ends of the jetties, but that does not seem to be the case.

Section 2.1.1

"Tank vessels approach the project site via the Grays Harbor Navigation Channel (GHNC), which runs from the mouth of Grays Harbor to the Port docks." So, the mouth of the harbor is at the western extent of the GHNC, which per Figure 2-1 is approximately 5 miles WSW of the west end of the North Jetty, or 7 miles from the nearest shoreline?

Response GP547-1

The mouth of the harbor, while not delineated in the Draft EIS or in standard nautical navigation charts, can be considered the area between the north jetty at Point Brown and the south jetty at Point Chehalis.

Comment GP547-2

Section 3.4, Plants

"The 683-acre Oyhut Wildlife Recreation Area and adjacent Damon Point are located at the south end of the Ocean Shores Peninsula at the mouth of Grays Harbor." So, some point of the mouth is located at some point at the south end of Ocean Shores?

Response GP547-2

The question in the comment is unclear. However, the locations of the Oyhut Wildlife Recreation Area and Damon Point are shown on Draft EIS Figure 3.4-2, *High-Quality Vegetation Communities in and along the Shoreline of Grays Harbor*.

Comment GP547-3

Section 3.10, Recreation, p 3.10-10

Razor clam harvests are managed from "the north jetty at the mouth of Grays Harbor" … and … "to the south jetty at the mouth of Grays Harbor", which brings us back to the original supposition of jetty end to jetty end?

Response GP547-3

The mouth of the harbor, while not delineated in the Draft EIS or in standard nautical navigation charts, can be considered the area between the north jetty at Point Brown and the south jetty at Point Chehalis.

Comment GP547-4

Issues in Executive Summary

The Executive Summary states that each section has a specific study area, but for vessel traffic the study area is basically "Resources in and around Grays Harbor that could be affected by vessel

transport." (4) So why do the DEISs exclude the ocean beaches from all Study Areas? Why are they not considered an area "around" Grays Harbor that could be affected?

Issues in Chapter 3, Affected Environment, Impacts, and Mitigation:

Study Area A is stated for the following sections in Chapter 3. Some inconsistencies within the text are pointed out below. There are likely more within the approximately 300 pages in the chapter.

3.2 Air, 3.3 Water, 3.4 Plants, 3.5 Animals, 3.7 Noise

Assuming for a moment that the mouth of Grays Harbor is that imaginary line between the ends of the jetties, Study Area A does not include the entire Grays Harbor Navigation Channel, therefore does not include all vessel traffic. (5) How can Section 3.5 Animals, which discusses marine mammals and the potential for vessel strikes considered adequately studied if it does not cover the entire GHNC? (6) How can any of the above sections which involve vessels be confined to Study Area A as opposed to something similar to Study Area C?

While Section 3.4 Plants is stated as Study Area A, Figure 3.4-2 shows otherwise. What the figure is showing might be similar to what is described in Study Area C. (7) What is the correct study area?

Response GP547-4

The study area is not identified with letter identifiers (i.e., "A" or "C," as the commenter states). The study area for plants is described generally in Draft EIS Chapter 3, Section 3.4, *Plants*, and specifically in Section 3.4.3.2, *Impact Analysis*. The description is consistent with that shown in Figure 3.4-2, *High-Quality Vegetation Communities in and along the Shoreline of Grays Harbor*.

Comment GP547-5

Section 3.10 Recreation is also stated as Study Area A, but discusses chartered ocean fishing, whale watching, and razor clam harvest areas from Copalis Beach to Willapa Bay on the Pacific Ocean beaches. (8) Isn't this a much more reasonable place to start to define an accurate study area for all sections of the DEISs that extend into the ocean and affect the ocean beaches?

Response GP547-5

Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, presents an analysis of potential impacts on channel capacity, Terminal 1 berth occupancy, and other vessels related to routine vessel transport through the Grays Harbor Navigation Channel.

Comment GP547-6

Study Area C is stated for 3.17 Vessel Traffic, which leads to additional questions about the relationship between Study Areas and the Grays Harbor Navigation Channel. (GHNC)
The Entrance Channel Reach and Bar Channel Reach are the most dangerous areas of the GHNC and the most likely areas for accidents. (9) Why should any Study Area that extends outside the mouth of the harbor and includes the entire GHNC exclude the area between the channel and the ocean shoreline?

Footnote 2 on page 3.17-1 describes the GHNC as "Nearly 23 nautical miles long, it begins approximately 4 miles offshore, runs in a predominantly easterly direction past Westport, Hoquiam, and Aberdeen, and ends at Cosmopolis near the mouth of the Chehalis River." (10) Four miles

offshore from where? The map on the next page, Figure 3.17-1, when measured to scale straight to the shoreline is closer to 7 miles.

Response GP547-6

Draft EIS Chapter 3, Section 3.17.1, *What is the study area for vessel traffic*? Defines the study area as the Terminal 1 berth and the entirety of Grays Harbor, including the navigation channel into and out of the harbor out to 3 nautical miles from the mouth of the harbor. Chart 18502 refers to the length of the Bar Channel as 4.6 nautical miles. The Bar Channel extends in a southwesterly direction from the Grays Harbor entrance channel.

Comment GP547-7

Issues in Chapter 4, Environmental Health and Safety

The Study Area defined in this chapter is simply unacceptable. I shouldn't have to say anything else.

Grays Harbor County

The Study Area for this Chapter is, unbelievably, area B. It stops wherever the end of Grays Harbor is going to be defined. It does not even go the 3 nautical miles out as in Study Area A, much less out to the end of the navigation channel as in Study Area C, or up and down the ocean beaches of Grays Harbor County, which history shows will be impacted by a spill. The explanation is that anything outside of the harbor is considered in the extended vessel transport area covered in Chapter 5, which describes its vessel study area as the entire west coast of the United States.

How is it possible to even consider stopping the study area for vessel spills prior to the end of the Grays Harbor Navigation Channel? The Entrance Reach Channel and Bar Reach Channel are the most dangerous sections of the channel, thus the most likely places for an accident and a spill. (11) How can the DEISs exclude any portion of the Grays Harbor Navigation Channel from the vessel spill study area? (12) How can they not go 3 nautical miles out as almost all other section study areas do?

(13) Does this let the oil companies off the hook for things like contingency plans, spill response plans, training, drills, or financial responsibility for cleanup, restoration, and reimbursement?

(14) The ocean beaches are included in the Grays Harbor Geographic Response Plan, which is part of the Section 4.2.2 framework to deal with an incident, so why aren't they in the Chapter 4 DEIS study area?

(15) Can you say Nestucca? It is certainly mentioned several times in the DEISs. Why was the information documented about its oil spill not used in any part of the analysis? The bar, the weather, human error, extent of damage with only 231,000 gallons spilled.

[large text: This is simply unacceptable. The ocean beaches of Grays Harbor County are not a "throwaway" into Chapter 5.]

Western Washington Coast

The ocean beaches of the entire Washington coast should be part of the study area for these DEISs.

(16) Nestucca, Tenyo Maru, New Carissa, Paula Lee (the DEISs missed that one because it didn't spill anything.) The information about these vessels seem to simply be printed in the DEISs, but the

information about what happens in weather on the northwest coast is not used to do any analysis or come to any conclusions. Why not?

Response GP547-7

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

GP548, **Penry, Marlene**

Comment GP548-1

Why aren't the Oyhut Wildlife Area, John's River Wildlife Area, and Elk River NRCA included in the discussion in Section 4.7.1.2 Plants impacted by an oil spill? Although the entire Grays Harbor Shoreline is included in general, these areas are all shown as High Quality Vegetation Communities on Figure 3.4-2. Since the Wildlife Refuge and Surge Plain are specifically noted from that figure, shouldn't the other three areas also be brought to specific attention in this section?

Response GP548-1

Final EIS Chapter 4, Section 4.7.1.2, *Plants*, has been revised to recognize these areas as sensitive areas.

GP549, **Penry, Marlene**

Comment GP549-1

Issues Regarding Risk Assessment of Vessel Oil Spills

No matter how many statistics the DEISs present in Appendix M, and no matter how many probabilities of incidents are presented there from reports from Canada (.0039), International Maritime (.0017), or Glosten, the lowest, which ICF chose to use (.00015), doesn't the concern of risk in Grays Harbor really come down to the following, real, information provided within the DEIS chapters?

Section 4.1.2 The Study Area for Chapter 4 vessel traffic incidents is Grays Harbor, not the west coast, not Puget Sound, not Canada, not international.

(2) Navigating through Grays Harbor is dangerous (sorry – "challenging"):

Section 3.17.4.1 Vessel Traffic, Grays Harbor

"Offshore, extending approximately 2 miles from the mouth of the bay is an entrance bar composed of sand and silt, which is subject to the effects of tide, current, and ocean forces. The bay enclosed in

Grays Harbor is filled by many shoals and flats, some of which are bare at low water and are cut by numerous channels" …. "The entrance bar, coupled with strong and sometimes erratic currents, can present a navigational challenge to vessels entering or leaving Grays Harbor. Periods of limited visibility due to fog, rain, or darkness can add to this challenge. Submerged sections of the north and south jetties at the harbor entrance extend seaward about 0.2 and 0.9 mile, respectively. Hazardous breakers can occasionally be present near these jetties, especially during periods of heavy weather."

Section 4.3.2.3 Environmental factors contributing to incidents

"In addition to fog and swells caused by high winds, water flow conditions in the Bar Channel Reach of the Grays Harbor Navigation Channel (at the entrance of the harbor) vary depending on ebb or flood tidal currents, speed of the Chehalis River runoff, wind, and ocean swells just outside the entrance. Average current velocity is about 1.9 knots on the flood and 2.8 knots on the ebb but velocities have been known to reach 5 knots. The direction of the current near the bar can be erratic, running north close inshore and south offshore."

Section 4.6.2.1 Oil Spill Risk

"Grays Harbor has navigational challenges, including a bar at the entrance to the harbor, a constrained navigation channel for deep-draft vessels, and sharp turns in the channel."

(3) "Incidents" occur in the harbor somewhat regularly:

Section 4.6.2.1 Oil Spill Risk

"From 2008 to 2014, several vessel incidents occurred in Grays Harbor, including one methanol spill from a vessel. Five incidents were caused by loss or reduction in propulsion. One of these resulted in a vessel grounding with no damage or spill and one resulted in an allision with a buoy with no damage or spill. In 2011, a ship spilled 200 gallons of methanol to water because of human error in connecting a hose to a flange for a transfer."

Number of Oil-Laden Vessels in Grays Harbor:

Section 6.5.6.2 Cumulative Impacts, Table 6.18 Vessel Trips:

Total Large Commercial Vessels Trips in 2017 without proposed projects: 324

Total proposed Vessel Trips in 2017 carrying crude oil: 758

Every large commercial vessel carries some significant amount of bunker fuel for propulsion. With the proposed projects, 70% of those vessels will also be carrying crude oil.

So, how are we supposed to believe that it will be 120-360 years (page 4.6-5) before an oil spill occurs? Should the DEISs base spill risks on mind-numbing statistics from an Appendix or on the simple reality of Grays Harbor that has already been presented in the Chapters?

A spill will happen, and per the Washington Department of Fish and Wildlife "Grays Harbor is an area particularly sensitive to the adverse effects of oil spills." Their scoping comments concluded these projects to be an "unacceptable risk." The promise of new jobs pales in comparison to the jobs and industries that will be impacted by an oil spill for years and possibly decades.

Grays Harbor is no place for oil terminals and oil vessels. The risk is too high. The risk is unacceptable.

Response GP549-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

GP550, **Penry, Marlene**

Comment GP550-1

Small on-site spills P. 4.4-5 and Figure 4.4-2 The small vessel-loading spill scenario with a high likelihood of occurring and a high likelihood of reaching water is of considerable concern. However, what about the scenarios not shown, with even smaller amounts that reach the water that are likely to happen much more frequently? Five or ten barrels now and then, leaked into the waters that go unnoticed. Oil that is likely to be dispersed out into the harbor before any response could be taken. However, wouldn't these frequent smaller spills have significant cumulative impacts on the harbor areas close to the terminals, for example the Fry Creek salmon runs, the National Wildlife Refuge, and tribal fishing areas? Slow accumulation of oil into the mudflats and salt marshes is just as deadly as one significant spill. How do you protect the harbor from the cumulative impacts of very small spills?

Response GP550-1

The small spill scenarios addressed in Draft EIS Appendix M, *Risk Assessment Technical Report*, and Appendix N, *Oil Spill Modeling*; and summarized in Draft EIS Chapter 4, *Environmental Health and Safety,* include any volume up to the specified amount. As noted in Chapter 4, existing regulations and proposed mitigation cannot completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

GP551, **Penry, Marlene**

Comment GP551-1

This sentence occurs TWENTY-THREE times in Chapters 4 through 7: "However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, fire, or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion." So, the DEISs say this is a bad place for oil terminals. It will take only one of these spills in the harbor to ruin the economy and environment of Grays Harbor and its shoreline communities. It will take only one of these train spills and explosions to risk lives, destroy homes and businesses, and create enough air and water pollution to cause short-

term and long-term health problems. The risks and costs of crude oil-by-rail in Grays Harbor County far outweigh the benefits. Every community from the oil fields to Grays Harbor takes all the risks, the oil companies reap all the profits. The number of lost jobs and livelihoods, and possibly lost lives and homes, will far outnumber any new jobs being promised. The new jobs benefit the Hoquiam/Aberdeen area, the losses could affect any of the hundreds of communities between the oil fields and the ocean. How can the you justify imposing this risk on the communities of Grays Harbor, most of which have passed resolutions against crude oil-by-rail? How can you risk building these projects in an extremely environmentally sensitive area, which we all know, but has been officially stated as unacceptable by the Washington Department of Fish and Wildlife? Our county has a low-income population. This makes it a typical target of dirty industries like coal and oil, promising jobs. Why does your Appendix O Economic Impact Analysis show only the benefits of those jobs and not the costs of all the potential losses of jobs and livelihoods that depend on a clean Grays Harbor? Where, in 3000 pages, do you actually justify the merits of these projects?

Response GP551-1

For more information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP552, **Penry, Marlene**

Comment GP552-1

As I work to get my final comments submitted, and as I select Comment Type “Westway and Imperium EISs (Default)” one more time, I have to wonder again about the possible illegality of the manner in which these DEISs were prepared and presented. Obviously one DEIS was written and copied, then a few changes were made in the second one, then we were presented with two projects and two DEIS documents and about 3000 pages to read and comment on. So the two DEISs are virtually the same. The DEIS scoping, hearings, comment periods, comment forms. and addresses to send comments to have been the same. The answer to any question will be the same for both. So how could there ever be a possible outcome that one project would be accepted and the other denied? It’s both or neither. Is this legal? I would guess that Grays Harbor Rail Terminal is going to be another duplicate DEIS with just a few numbers changed. So, whatever happens with these first two DEISs, there is a precedent set for the same outcome for the third one. So any scoping or commenting for GHRT will just be a sham. There is another problem with these two DEISs. Reading

the impacts of either one of them individually, as if the other wouldn't happen, is virtually a lie. The way this is being handled, nothing really tells the true picture of what will happen until you get to Chapter 6, Cumulative Impacts, but that Chapter does not report on all the resources covered in Chapter 3. So you never do truly get the whole picture of the two projects together even though they will be decided together. I have been told the word for this is "segmentation" to make the two projects seem to have less impact. I have also been told that is illegal. Please explain how this is all legal and above board. How would it be possible to accept just one project based on how you have handled this process?

Response GP552-1

The Draft EIS reflects the analysis of impacts and proposal of mitigation measures specific to the proposed action. Similarities in the Draft EIS for the proposed action and the Draft EIS for the REG (formerly Imperium Terminal Services) Expansion Project accurately reflect the similarities between the proposals. Refer to the Master Response for Cumulative Impacts Analysis for an explanation of the scope of resources considered.

GP553, **Penry, Marlene**

Comment GP553-1

Weather concerns The harbor entrance has the most severe weather and seas, thus is the most likely place for a serious oil vessel incident. Several mitigation measures state that to reduce risks of incidents, specific procedures will be put in place for extra tug support in bad weather conditions. Why aren't there parameters for weather conditions when oil-laden vessels are not allowed to move through the harbor at all? It takes two hours for a vessel to transit the harbor. The weather can change in that time. During winter storms, weather at the bar can be much worse than at the terminal. In some places the DEISs state a vessel might weigh anchor in the designated anchorage area to wait for weather conditions to change. Who makes the on-the-spot decision as a vessel approaches the mouth of the harbor whether it should stay or go? If the vessel weighs anchor, what are the parameters and who makes the decision when it can depart? I am concerned that only experienced Grays Harbor pilots and the USCG are able to make these decisions, but that ships' captains will be allowed to make them.

Response GP553-1

Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*, describes the systems in place to manage vessel traffic in Grays Harbor safely. Final EIS Section 3.17.4.4 provides additional information.

GP554, **Penry, Marlene**

Comment GP554-1

The designated anchorage area in the harbor can hold only three vessels. With two or three oil terminal companies and multiple other port tenants, who decides which vessels can use the anchorage area, which outgoing vessels must stay at the terminals, and which incoming vessels must wait outside the harbor? The DEISs Section 3.17 Vessel Management and Chapter 4 Environmental Health and Safety do not address the increased risks of having multiple vessels anchored inside and

outside the harbor, some of which could be oil-laden, at the same time as an oil-laden vessel is transiting the navigation channel. In the worst case scenario, there could be four oil-laden ships near the mouth of the harbor at the same time. Why was the possibility of another nearby oil-laden vessel not considered a factor in the spill risk scenarios?

Response GP554-1

Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*, describes the systems in place to manage vessel traffic in Grays Harbor safely. Final EIS Section 3.17.4.4 provides additional information.

The risk assessment does not differentiate between different causal events, but does consider the possibility of vessel collisions. As noted in the Master Response for Environmental Health and Safety Analysis, the scenarios were chosen using expert opinion on locations where spills could typically occur, such as during fuel transfers, or where worst-case spills might occur, such as a vessel incident at the entrance to Grays Harbor. The quantity of oil spilled for these scenarios was based upon the definition of worst-case spill for an onshore facility, a vessel, and for rail transport (WAC 173-182-030 and 480-62-300). The largest tankers would be Panamax class with the capacity to hold up to 15.1 million gallons (360,000 barrels). An additional 420,000 gallons (10,000 barrels) was added to represent the fuel onboard the vessel.

GP555, **Penry, Marlene**

Comment GP555-1

The DEISs do not take the economies of all of the communities of Grays Harbor into consideration, especially not the ocean beach communities. They do not consider that oiled beaches, that per Section 4.7.1.5 Recreation, could take months to years to clean up and recover, would destroy the economy and quality of life in places like Ocean Shores. Chapter 4 indicates the owners/operators/charterers of the oil vessels are financially responsible for vessel spills. How many companies could be involved? Who manages and oversees that each of these companies has the required financial backing before they bring a vessel into our harbor? Are they required to reimburse communities for lost tourism, therefore lost revenues, lost jobs, closed businesses? The kill-off of razor clams would also result in the loss of critical off-season tourism revenue that helps our businesses survive the winter. Are they liable for destroyed homes, lowered property values, the inability to sell houses? What about health problems that oiled beaches and the resulting air pollution can cause? How do you put a monetary value on the lost quality of life which is why people move and live here? As an oil spill cleanup spreads over the months and years, nothing stops these companies from declaring bankruptcy and leaving us with the mess. Even without that happening, how likely is the money to be forthcoming when we need it? Insurance payments take time. Court proceedings take even more time. Meanwhile, our economies fail. There is simply no way that the few benefits of these projects can ever outweigh the risks. There is no rational response to these proposed projects other than to deny the permits.

Response GP555-1

Refer to the Master Response for Purpose and Focus of the EIS.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*. Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

GP556, **Penry, Marlene**

Comment GP556-1

Oil Modeling Concerns

There might be 3000 or so pages of DEISs that we are dealing with, but the bottom line to most of us who live on the shores of Grays Harbor is oil spills. The Oil Spill Modeling in Appendix N is so inaccurate and inadequate that it makes one wonder how much of the rest of the DEISs was worth reading and should be believed.

The GNOME software cannot model Bakken or Diluted Bitumen. The text goes into great detail to assure the reader that each has heavier and lighter properties, so it is perfectly logical and accurate to model them as medium crude oil, but in the end, oh, by the way, medium crude oil is the only crude oil that GNOME can model. However, if you stick with the appendix to the end, Table 3 on page 13 tells a completely different story about how different their properties are after 48 hours. Also, you have to make it to Attachment B before you learn that Bakken is much less viscous than medium crude so it will spread out thinner (further?) on the water. (The Imperium DEIS does not model, or even have so much as a footnote about, any of the other types of oil being proposed for that project.)

GNOME cannot model outside the harbor, so once again, the ocean beach communities are left with no information, even though the purpose of this appendix is “to allow planners and decision makers to understand the range of consequences” of an oil spill.

One of the model’s inadequacies is very apparent when looking at the 24 and 48 hour Figures. It seems the ebb and flow of the ocean tides has no influence on where the oil moves.

Lacking reliable discharge data for the Chehalis River, an “informed estimate from a similar river” was used in the model. Just one more “made up” piece of the model, more to come. The Grays Harbor GRP has discharge data for the Chehalis River from the USGS. Could that have been used? The GRP also contains input for the Humptulips River which has significantly different flows directly into the North Bay summer and winter, but was not included in the model.

An “instantaneous release” was modeled to provide “an extreme representation.” No, an extreme representation would model the most likely scenario, a spill at the mouth of the harbor in a winter storm, not in 10 mph winds.

At Table 1, things get absurd. I am not a scientist. I am a resident of Ocean Shores. I have lived on the southwest end of the Ocean Shores Peninsula for 15 years. Our winter winds do not prevail from the ENE. Quite the opposite, they come from the WSW. With ENE winds as input, none of the winter modeling can be correct. I also doubt our average winter winds are only 10mph. Weather from Bowerman Basin, almost 20 miles inland, can be significantly different than weather at the entrance to the harbor. And, once more, there is no input parameter for the ebb and flow of tides, which are considerable, and often extreme.

If you make it past all of this and get to page 12 and Table 2, you find alarming figures of a minimum of 45%-75% of oil beached within 24 hours. On the Figures, with all of the yellow and green and gray out in the water, the little red dots along the shore do not represent that level of significance well. These percentages should be printed on the Figures.

In conclusion, the DEISs oil models provide inaccurate, incomplete, inadequate, and misleading information on the consequences of oil spills in Grays Harbor. With virtually no information on the biggest risk of these projects, how is it possible to permit them to move forward?

Response GP556-1

Wind data reflected in Table 1, Four Sets of Hydrodynamic Conditions, of Draft EIS Appendix N, *Oil Spill Modeling*, are correctly identified as coming "from" the direction indicated.

Draft EIS Appendix N, *Oil Spill Modeling*, presents data from ADIOS at the 48-hour mark to easily compare with the GNOME mass balance estimates at that same period. This comparison provides a better representation of the behavior of Bakken crude oil or diluted bitumen (dilbit), which can be modeled using ADIOS but not GNOME, in the environment.

Refer to the Master Response for Oil Spill Modeling Methods, which addresses the applicability and selection of the three models used as part of the oil spill modeling effort: GNOME, ADIOS, and Hydrologic Engineering Centers River Analysis System (HEC-RAS). It was determined that these models provided sufficient analytical capabilities for the purposes of evaluating spill scenarios for the Draft EIS. GNOME, specifically, was selected to complete the oil spill trajectory analyses because it is a commonly accepted industry standard for contingency planning, scenario analysis, and oil spill response used by the National Oceanic and Atmospheric Administration, the U.S. Coast Guard, and the Washington State Department of Ecology.

GP557, **Penry, Marlene**

Comment GP557-1

November 30, 2015 Mr. Brian Shay City Administrator City of Hoquiam 609 8th Street Hoquiam, Washington 98550 bshay@cityofhoquiam.com Sally Toteff Director, Southwest Region Office Washington State Department of Ecology 300 Desmond Drive SE Lacey, Washington 98503 sally.toteff@ecy.wa.gov Paula Ehlers Shorelands and Environmental Assistance Washington State Department of Ecology 300 Desmond Drive SE Lacey, Washington, 98503 paula.ehlers@ecy.wa.go Westway and Imperium DEIS c/o ICF International 710 Second Avenue. Suite 550 Seattle, Washington 98104 Re: Westway/Imperium Draft Environmental Impact Statements

Thank you for the opportunity to review and comment on these documents. I have lived in Ocean Shores, Grays Harbor County for fifteen years and it is a beautiful place to live and play. I want to

keep it that way, so I regularly volunteer to work on Department of Ecology projects in Ocean Shores. I have worked on the Critical Areas Ordinance, I have spent several years working on a Wetland Mitigation Banking project, and I am currently working on the Shoreline Management Plan.

I have spent a considerable amount of time reviewing these documents, and have worked in my community to help organize and assist others in this process. This is actually just my final summary comment. I started submitting individual comments online before I determined I had so much to say! I hope there is some way you can review all of my comments in total, as fragmented as they might be. I am concerned that the process for submitting comments online was inherently flawed. Besides a five day period in November when no comments were being accepted, the online comment process as a whole was unclear, and it is impossible to know how many comments never made it through the submission process.

Response GP557-1

The issue was fixed and a phone support line was established to provide assistance 24/7 through the end of the comment period.

Comment GP557-2

The DEISs themselves prove, by stating dozens of times, there is no way to ensure a major spill or explosion will not happen, and there is no mitigation for the impacts on the environment should one happen, that these projects do not belong in Grays Harbor and the permits should be denied.

Response GP557-2

The commenter does not provide sufficient details to allow for a response.

Comment GP557-3

However, despite those conclusions in almost every section of the documents, the detailed information is presented in a manner that is biased towards the projects, not neutral. When not biased, they often have glaring errors or omissions.

Response GP557-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP557-4

The concern of “who will pay” echoes loudly through our communities. Allowing the oil terminal applicant to wait to provide financial assurances until just before operations begin, thus after permitting and construction is complete, is irrational. There is no reason to permit and allow construction if the applicant does not prove up front that they have the money to pay for all of the potential risks involved in the project.

Response GP557-4

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel

transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP557-5

Transporting Bakken crude by rail continues to frequently result in accidents and explosions, and there is little known how to clean up Diluted Bitumen crude when it sinks in water, if it can be cleaned up at all. This means nobody is able to safely transport one type of crude proposed, and no oil response plans are adequate to clean up the other type. The risks of these projects to the people of Grays Harbor, to our local economies including commercial fishing and tourism, to the beautiful environment and wildlife that make our area so special, these risks so outweigh the small potential benefits, that your decision should be easy and obvious. These permits must be denied. Sincerely, Marlene Penry Ocean Shores, Washington

Response GP557-5

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP558, **Penry, Marlene**

Comment GP558-1

Good afternoon. I'm Marlene Penny from Ocean Shores. Grays Harbor is a beautiful place to live. Mitigation means that you have chosen to do a project that cannot avoid making a negative impact on the environment. Even though there are mitigation measures, there are hundreds of instances that cannot be mitigated for.

Mitigation costs money. So what do unmitigatable measures cost? What are the costs for handling these unmitigatable instances? The analysis lists the only environmental safety cost as training the Hoquiam Fire Department. Where are the costs of just one incident? And it will happen, ruining our local communities' economy and environment. If these permits are recommended, it will be obvious that the risks and costs far outweigh the benefits of these projects. Make the right choice, deny these permits.

Thank you.

Response GP558-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP559, **Perk, David**

Comment GP559-1

Grays Harbor is not an appropriate location for an oil terminal. The shipping channel is narrow and shallow. The proposed volume of tanker traffic would put the marine environment, fisheries and recreational boating at risk of an oil spill. Panamax tankers servicing the proposed facility would carry tremendous amounts of oil, enough to ruin the local maritime and recreational economy for decades with a single spill. In their letter of May 27, 2014 (1), the Department of Fish and Wildlife noted that Grays Harbor would be "particularly sensitive" to spilled oil and detailed many species that would be effected, including some listed as endangered. The mitigations contained in the Westway and Imperium Expansion Projects Draft Environmental Impact Statements do not sufficiently address these impacts. (1) http://www.fogh.org/pdf/WDFWcommentsWestway-ImperiumProposals.pdf

Response GP559-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Section 4.6.3, *What mitigation measures would reduce impacts related to vessel transport?* to reduce the likelihood of a spill reaching the environment and the potential impacts if an incident were to occur in Grays Harbor. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. For more information about the data, assumptions and methods used in the risk analysis, refer to the Master Response for Risk Assessment Methods and the Master Response for Environmental Health and Safety Analysis.

GP560, **Perk, David**

Comment GP560-1

The economic impacts of a spill in or near Grays Harbor have been extensively documented:

1. http://www.sightline.org/2015/09/17/the-impacts-of-a-grays-harbor-oil-spill-in-13-slides/

2. http://www.sightline.org/2015/11/09/the-high-costs-of-a-grays-harbor-oil-spill-part-2/

3. http://earthjustice.org/sites/default/files/files/Letter%20Maia%20Bellon%20at%20Ecology%20re%20Economic%20Report%20Attachment.pdf

A spill would be devastating to the local economy, but even the uneventful operation of the proposed expansions would affect the quality of life of the local community, and could lead to the loss of fishery, recreational and tourism revenue. The Westway and Imperium Expansion Projects Draft Environmental Impact Statements fails to provide adequate mitigations for these economic impacts.

Response GP560-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP561, **Perk, David**

Comment GP561-1

The proposed Westway and Imperium Expansion Projects would put the Quinault Nation at risk to an unacceptable degree. In the event of even a moderate oil vessel spill their marine economy could suffer disproportionate financial loss; the impact to their quality of life and cultural wellbeing could be irreparable. Subjecting their community to the possibility of that risk is itself injurious. The Draft Environmental Impact Statements do not sufficiently address these concerns. Moreover, oil recovery offshore has proven to be extremely difficult and expensive in the past, as detailed by the Sightline Institute's examination of past spills and the state's response: http://www.sightline.org/2015/10/21/washington-is-still-unprepared-for-a-grays-harbor-oil-spill/ Given the risks of spills within or near Grays Harbor, the economic and cultural impacts to Grays Harbor County and the Quinault Nation, and since our State lacks the resources to adequately address marine oil spills and related restoration efforts, the proposed terminal expansions are inappropriate and should be rejected.

Response GP561-1

Final EIS Section 4.7.1.7, *Tribal Resources*, has been revised to address impacts on the tribal resources specific to the cultural, economic and subsistence significance of these resources. The assessment addresses impacts on treaty-reserved access to these resources and potential impacts of a spill on Quinault Indian Nation fishing seasons and harvest. That section references Section 3.12, *Tribal Resources,* where the Quinault Indian Nation study on the number of fishers and number of fish harvested are reports.

GP562, **Perk, David**

Comment GP562-1

The Westway and Imperium Expansion Projects Draft Environmental Impact Statements do not consider tsunami risks resulting from a subduction zone earthquake. This omission from state design standards is clear evidence of a regulatory failure. Until an appropriate mitigation is proposed that would protect the oil tanks from the resulting 20 to 100 foot tsunami waves, the review process should be suspended. Preparing the oil tanks against earthquakes by means of pilings that do not reach bedrock seems inadequate at best and grounds for denying the proposed expansion.

Response GP562-1

To inform the risk of tsunamis at the project site, an updated tsunami model was completed and an updated assessment of tsunami risks specific to the project site, which accounts for sea-level rise, is presented in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis.* Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

GP563, **Perk, David**

Comment GP563-1

By limiting the calculation of probability of harm to the last 60 miles of the rail route, the Westway and Imperium Expansion Projects Draft Environmental Impact Statements does not adequately calculate the impact of oil train spills and derailments. The calculation should be for the entire route. The DEIS suggests that medium to large spills during rail transport are moderately to highly likely. This is an unacceptable impact. In the nearly 1,200 oil spills that occurred on the west coast last year, human error was a factor in one third of them. When it claims that a medium spill will occur once every 1,100 years and a large spill once every 22,000 years DEIS greatly underestimates the likelihood of an accidental spill. These estimates should be recalculated. Oil spills have skyrocketed in recent years. This is unacceptable. A moratorium on oil transport by rail is needed until the railroads are able to securely transport crude oil.

Response GP563-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the

reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

It should also be noted that the results presented in the Draft EIS are not directly comparable with studies that evaluate risks outside this area (e.g., the BNSF main line). This is mainly because detailed risk analysis presented in the Draft EIS is specific to the PS&P rail line. There are substantial differences between the study area (PS&P rail line) and the extended study area (e.g., BNSF main line) with respect to rail transport conditions. The scale of the nationwide rail system is more than a 1,000 times the length of the 59-mile-long segment of the PS&P rail line in the study area and different classes of rail travel at different speeds and under different regulatory requirements. Many more trains travel each day on the main lines. For these reasons, the likelihood of an incident occurring in the study area is lower than the likelihood of an incident occurring on the entire mainline rail system.

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

GP564, **Perk, David**

Comment GP564-1

The Puget Sound and Pacific railway is inadequately insured to convey oil to the proposed Westway and Imperium Expansion Projects. As documented by the Sightline Institute (1), their insurance of $500 million or less is only one sixth of the potential cost of a catastrophic derailment. This leaves Washington taxpayers in an unacceptable position of risk. Even larger more well insured railroads are insufficiently insured when it comes to moving oil trains through populated areas. Moving oil by rail in the volumes currently practiced is unacceptable; until federal regulators wake up to their responsibilities, communities such as Hoquiam and Grays Harbor County should not allow facilities to receive oil by rail. (1) http://www.sightline.org/2015/10/19/grays-harbor-oil-trains-would-be-severely-under-insured/

Response GP564-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents

for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP565, **Perk, David**

Comment GP565-1

The proposed Westway and Imperium Expansion Projects will facilitate the consumption of oil resulting in about 74,000 metric tons of CO2. The Draft EIS fails to provide adequate mitigations for this greenhouse gas pollution. The Draft EIS fails to use the Social Cost of Carbon(1) to estimate the cost of mitigating the release of these greenhouse gases, or the source of those mitigation funds. (1) http://www3.epa.gov/climatechange/EPAactivities/economics/scc.html

Response GP565-1

Refer to Chapter 3, Section 3.2.7.1, *Applicant Mitigation*, for proposed mitigation measures to reduce emissions related to onsite operations. Refer to the Master Responses for Mitigation Framework and the Purpose and Focus of the EIS.

GP566, **Perrotti, Edward**

Comment GP566-1

Only wish to say that we also need to have a look at the frequency of vessels that enter here to take the crude to the refiners. What type and hull structure and how many and how do we stack up against other Ports in terms of having a ship or barge run aground. There may be tides but we have to come in by way of that narrow gap and then back again. That would be my only concern. They can mitigate the rails by moving slow and not having long trains but shorter ones.

Response GP566-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations, including requirements for vessel design, and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

GP567, **Perrotti, Edward**

Comment GP567-1

These two sites are crude oil storage terminals. First and foremost, hard to see how any Bakken Crude or Canadian Tar Sands can be shipped when we see this free fall in price. So much for the short term. In warfare we like to have a shakedown cruise, maybe do it at a smaller scale and see the

risks. In moving any type of product, trains that arrive have to go slowly and best to have shorter trains, less likely to tip over, what some call a derailment.

Response GP567-1

Comment acknowledged.

Comment GP567-2

The main reason that I write today (please see the attached CV) is we do need a robust Port and jobs and we have to do what we can to try hard to remove risks. The crude has to be refined and that means it eventually has to be shipped from here. The off loading into the terminal and then at some point taken or lifted to barges or tankers. The fact is we have a small opening between Ocean Shores point and the tip of Westport and that could be the major or type of bottle neck which has to be addressed. The Straits are narrow passages. If we can please try to address that and have the USGS as well as the Army Corps assure safe passage.

Response GP567-2

Draft EIS Chapter 3, Section 3.17, *Vessel Traffic,* describes the roles and responsibilities of the U.S. Coast Guard and U.S. Army Corps of Engineers and discusses the considerations for vessel traffic in Grays Harbor. Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, discusses the regulatory framework that prevents vessel incidents from happening; prepares for vessel incidents; and provides for response to vessel incidents. Section 4.6, *Environmental Health Risks—Vessel Transport,* discusses risks related to vessel transport and proposes mitigation to coordinate with the U.S. Coast Guard to reduce potential risks associated with a potential vessel incident.

Comment GP567-3

The risk of a major earthquake could cause that passage to be damaged as ground here turns to quick sand and of course we then would have to deal with a wave that could well destroy our infrastructure. Do we need some sort of canal and locks to protect shipping here from that risk of a Cascadia, a 9.0 and then the subsequent wave?

[Attachments: "A Proposal to the US Energy Department for a New Composit Fabrication Plant to be Located in Grays Harbor County." July 11. Edward Perrotti, CV]

Response GP567-3

Refer to the Master Response for Purpose and Focus of the EIS. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP568, **Perrotti, Edward**

Comment GP568-1

As we approach the upcoming meetings here on the two oil storage terminals, I am reminded of the work done on the Pontoons. The Aberdeen library has the seven volumes and you can read them online as well. As with any project there are pros and cons. The pros suggest that we need investment and jobs and the cons say is oil the best way forward. The other path is the one that also

says that perhaps the trains do not have to be that long and why not de couple them before entry here and have a spare locomotive or two before the trains pass along the side of the road. Would this help find a use for the now vacant Pontoon site? Where the barges could be repaired? Does this help the Seaport? Maybe those that invest here may then want to use that as a facility, bringing much needed income to that site. The other factor is they have a section on vessels. They do expect to use oil tankers and barges and to offlift to the refineries that we have in this state. Washington state is number five in the USA in refining and we stiil have to use petroleum products maybe until there is a cold fusion break through. And of course refined product from here will be exported to Asia and that helps the state economy immensely in order to pay for schools. MIT did discover Graphene and that makes solar and computers more effective, moves those technologies off the less efficient silicone resistors.

Response GP568-1

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment GP568-2

The only other thing is that gap we have here, the channel where vessels have to pass. Perhaps the USGS and Corps should address that as it could well be a bottleneck and possible hazard to traffic flows. I know some say not here and will voice that opinion. Respect that right but try to not disrupt. Please at least try to see both sides, the pros and cons. But with all of this, some do weight these factors quite differently.

Very sincerely and respectfully yours,

Edward D Perrotti

[Attachments: “A Proposal to the US Energy Department for a New Composit Fabrication Plant to be Located in Grays Harbor County.” July 11. Edward Perrotti, CV]

Response GP568-2

Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*, describes the movement of vessel traffic into and out of Grays Harbor. Final EIS Section 4.6, *Environmental Health Risks—Vessel Transport*, addresses the risks of an oil spill, fire, and explosion and includes mitigation measures to reduce these risks during vessel transport. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP569, **Perrotti, Edward**

Comment GP569-1

My name is Edward Perrotti. I have an engineering degree from MIT. And I've been -- I'm retired and I used to work for Texaco in London.

The only real comment -- I actually read all six volumes. How many people have actually read all six volumes? The study is done very, very well; okay? So number one, people should read it and recognize that the information that was provided, the expert, the data, it was very well done. So thank you for doing a very good study, whoever did that, the State of Washington.

Response GP569-1

Comment acknowledged.

Comment GP569-2

If they're going to do it, they have to do it safely; okay? The only problem in the state of Washington, if you've lived here a long time, is we built a lot of this stuff here in the early 1900s.

Now, this particular bridge here is 1903. Some of these supports, which are down below the riverbed, don't support anymore. We have this problem here in Hoquiam.

So what we have to do as a state -- and I don't know how we're going to ever do this. They have a system where they use an endoscope. They can go 200 feet below the riverbed. They can inspect the pilings. And if they find there's wear and there's deterioration, they can inject concrete. And it provides this massive foundation of support so the bridge won't collapse on a load.

Number two, they could shorten the trains. They could also look at a system where they shorten the trains. They could keep spare locomotives and then basically have a long train coming in, carve it up into parts, and then bring in a shorter train.

Spills occur at transfer points; okay? Transfer points are where you're loading them on vessels. And when they do loading -- if you ever go to Ras Tanura, they have systems over there that they phased in over years and years. And they're spill-proof. They just don't spill a drop of this stuff. But that's the concern I have. If we're going to do it, we better do it right.

Mitigation of risks. There's a catastrophic risk. It's very hard today to quantify how to repair it, how to correct it. If damage is done, how do you fix it? In a building like this, which is maybe a historic landmark, if it's damaged, it's gone. You're never going to get it back.

But in the case of petroleum products, crude oil, if there is some damage, I think the question is, how do you repair it? The studies looked at some of that. You can't quantify it. So they basically said -- and it's very difficult to come up with numbers. How do you repair the damage if there is damage?

But if they're going to do it, do it safely. And tell them the study was really good.

The only thing with the six volumes, you have two projects. And I was looking for -- I was looking for three more volumes. I was looking to take the combined -- the two projects, combine them, and do a third set where I looked at the impacts of the combined. And I didn't see that, but the final will get done.

And the only thing is everything has to be reviewed by the EPA. And what they did in Vancouver, Washington, was they said, We're not going to allow it. And they told the Army Corps of Engineers, You can't dredge. And that's the system here. They have to dredge this. So it's going to get decided eventually, next year or the year after.

On the other side of the coin, look at Syria. We don't need to match their production? Oh my God. How do we get our military plans in the air if those supplies are cut off? And the only reason we did the Bakken and the tar sands is domestic production. Because we are at risk today because of Syria, because of The Gulf, because of the Saudis, because of the Iranians.

And that's the other side of it. Do you want the production? Do you want to be able to get your military to respond to a threat anywhere in the world? And you have to have petroleum. You have to have diesel. You have to have jet fuel. So you look at Syria and you say, Well, why don't we have domestic production?

So that's pretty much it. I have several degrees. One is from MIT, a doctorate in engineering, class of '75 -- no. '73. But I worked for Texaco and we built a refinery here in Anacortes. And we had a beautiful safety record. Then we got bought out by Chevron.

We did things very safely and we would phase things in. We had redundant systems and we always protected the environment. Believe me, we were very conscious of the environment.

So Texaco was a model oil company for many, many, many years. And then they kind of lost it in the '70s or the '80s. They kind of just fell short.

But if you looked at those companies '40s, '50s, and '60s, they did things properly. They did things very safely. They spent a lot of money.

Genesee & Wyoming is a very, very good company. They're in Darien, Connecticut. They have a very good safety record. They bought RailAmerica, who bought Puget Sound.

Now, Genesee & Wyoming is very proud of their record. It's the Fuller family. They're publicly listed. And I don't think they want to do any damage. I really don't.

And I think if we work with them, secure the bridges with these systems where you can pump in that gunk, it sticks good -- concrete, I think we can do a lot of things.

Well, my big concern is long trains. Cut them. You can shorten those and you don't have to risk that. You can mitigate that a little bit.

Well, thank you very much.

Response GP569-2

Refer to the Master Response for Purpose and Focus of the EIS.

Chapter 6, *Cumulative Impacts*, addresses the potential impacts of the proposed action in combination with other past, present, and reasonably foreseeable future actions.

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is

implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

GP570, **Perry, C.E.**

Comment GP570-1

The Native Americans got it right a long time ago - we must make decisions with the knowledge that there will be repercussions for 7 generations and more. We can do better than rubber stamping these permits in the name of economic development. They are far more insidious than they portray.

Response GP570-1

Comment acknowledged.

GP571, **Pfeiler, Ben**

Comment GP571-1

I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.

According to the DEIS, "The study area for greenhouse gas (GHG) emissions information includes the project site and emissions related to rail and vessel emissions in Washington State." [p. 3.2-1] This ignores the global effects of the project on global GHG emissions facilitated by the project. If this project facilitated an expansion of the use of chlorofluorocarbon emissions would you only consider the releases of CFCs in their transport? If the project facilitated an increase in global emissions of plutonium 235, would the impact of those emissions outside the state not be pertinent? To ignore the global effects of the terminal's facilitation of global increases in greenhouse gases is to ignore the elephant in the room. According to the DEIS, "The first target statutory reduction is to achieve 1990 level GHG emissions by 2020 and 50% below 1990 levels by 2050 (or 70% below the State's expected emissions that year)." [p. 3.2-2] The proper comparison is the level of reductions needed to achieve global warming of no more than 2 degrees Centigrade. The U.S. is responsible for about 26 percent of the greenhouse gas emissions currently in the atmosphere though our population is just 4.4 percent of the world's population. Washington State's fair share of future emissions is nil—far less surely than the proposed project's estimated in-state emissions indicated in the DEIS. Washington State and the nation is committed to dramatic decreases in greenhouse gas emissions,

yet these emissions are increasing. The Environmental Impact Statement must indicate options for mitigating project greenhouse gas emissions that reduce total greenhouse gas emissions. Appendix D, indicates that total throughput of petroleum enabled by completion of the three facilities would represent throughput equivalent to 1.2 percent of the nation's throughput of petroleum. To facilitate an expansion of the throughput of petroleum equal to 1.2% of the nation's throughput of petroleum represents a huge increase in greenhouse gas emissions. The carbon dioxide emissions from that quantity of petroleum are equivalent to about 30 percent of current annual Washington State greenhouse gas emissions. The draft Environmental Impact Statement falls far short of an adequate assessment of the impact of the proposed project on greenhouse gas emissions. At a minimum the final statement must address the local and global impact of all greenhouse gas emissions (including the impact of combustion of petroleum products in Washington State and elsewhere) on:

- the water cycle;
- the sea level;
- landslides, erosion, and sediment transport;
- Puget Sound and ocean currents and circulation;
- water quality;
- agriculture;
- terrestrial ecosystems;
- freshwater ecosystems;
- marine ecosystems;
- the built environment; and
- human health.

Thank you for your consideration of these comments.

Sincerely, Ben Pfeiffer

Response GP571-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources. Final EIS Section 4.7, *Impacts on Resources*, has been revised to more fully describe the potential human health impacts of an oil spill, fire, and explosion.

GP572, **Pfeiler, Nancy**

Comment GP572-1

Dangerous crude oil would travel on mile-long trains through the Columbia Gorge and out over the Olympic Peninsula to Grays Harbor. Building more fossil fuel capacity will only delay the transition to the clean, renewable energy economy we need to safeguard the climate. I am totally opposed to this project. Thank you for your attention.

Response GP572-1

Comment acknowledged.

GP573, **Pickering, Karen**

Comment GP573-1

Dear Washington Dept. of Ecology & City of Hoquiam: The DEISs for Westway & Imperium oil terminal proposals must be substantially revised to fully disclose the risks of oil spills, train accidents, increased train & oil tanker traffic, air pollution, noise, harmful impacts on tribal culture & resources, vehicle delay at railroad crossings, & negative impacts on the Columbia River Gorge National Scenic Area. It is highly likely that the indirect & cumulative environmental impacts would be significant & impossible to mitigate.

The DEIS failed to substantively address the concerns raised by many environmental groups & individuals. In particular the specific concerns related to the Columbia River Gorge National Scenic Area. This is inconsistent with the scenic area act, & it is illegal under the State Environmental Policy Act to ignore these impacts.

Some specific examples include: · The DEIS fails to:

1) Analyze the indirect project impacts to grade crossings in the Gorge, the extent that the increase in oil trains would impact the level of service for local traffic, and any necessary mitigation measures, such as new overpasses.

2) Analyze the cumulative impacts to grade crossings from the proposal and other oil and coal export proposals, the likely need to construct additional sidings, overpasses, and second tracks, and the need for additional emergency response capacity along the entire rail route.

3) List the Columbia River Gorge National Scenic Area Act & Management Plan as an applicable regulation, despite the fact that the cumulative impact of additional oil train traffic would require new construction in the Nt'l Scenic Area.

4) Disclose the actual risk of an oil spill or explosive accident in the Gorge. The DEIS provided analysis of the risk of a spill or explosion near the facility where maximum speeds are limited to 25 mph. The DEIS fails to disclose the risk of spills & explosions in the Gorge, where the max. speed is 50 mph for unit trains of oil & 60 mph for mixed-commodity trains with up to 34 oil tank cars dispersed throughout the train. - Analyze the likelihood of a spill in the Columbia River along hundreds of miles of the BNSF rail line. Along with failing to analyze the likelihood of a spill, the DEIS fails to analyze safety impacts to local communities, environmental impacts to threatened &

endangered salmon species in the Columbia River & operational impacts on Columbia River Dams. There is too much risk & little reward from these proposals: Grays Harbor & rail-line communities would take on the risk & oil companies would reap the profits, while Grays Harbor & the Columbia River Gorge would become a through-way for oil going elsewhere. Much of what makes these regions special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures & economies, spectacular coastal waters, sensitive habitats & protected lands & waters in the Columbia River Gorge. The safety record of oil trains means an explosive oil train derailment is a question of when, not if. Equally concerning is the air pollution, spill risks, & traffic delays oil trains would bring to communities along the rail line from Aberdeen to Chehalis, through the Columbia River Gorge & all the way to the source of the oil in ND & elsewhere.

There are better ways to meet our energy demands. WA State is moving away from fossil fuels & towards clean, renewable sources to meet electricity needs & respond to global warming. Building more, large infrastructure for yesterday's energy is the wrong path to meet today's energy needs & an economic gamble for Grays Harbor. WA should lead on safe, renewable, clean energy & say no to more oil & coal. I urge you to do everything in your power to stop these dirty & dangerous projects. I urge you to protect Grays Harbor, the Columbia River Gorge & communities by rejecting the proposed Westway & Imperium oil terminals. Sincerely, Karen Pickering

Response GP573-1

The proposed action does not involve construction in the Columbia River Gorge National Scenic Area.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Refer to the Master Response for Connected and Similar Actions for information about the consideration of other projects in this EIS.

GP574, **Plackett, Mark**

Comment GP574-1

Experience with crude by rail tells us that when we have a problem, it will be a really substantial problem. Unit trains going even 5 mph through wetlands with no solid roadway (which is the case with the trains going to Aberdeen, WA) is an invitation to disaster. Finally, the science tells us that when the spill or explosions occur, life as we know it will change a lot and in the negative. We need to protect people, our environment, and the marine resources we are here to steward, not put them at risk.

Response GP574-1

Comment acknowledged.

GP575, **Plunkett, Jim**

Comment GP575-1

Thanks for lending me the opportunity to express myself. My name is Jim Plunkett of Portland. Big project like an oil terminal, risks are quantified and then sold off in bonds. Risks that can be quantified are judged to be too small and outweighed by the public good.

Well, I'm a member of the public, and I don't believe that these oil terminals are worth the risk to my Columbia River, my salmon, my water, my future economy. As you travel on the tracks of the Grays Harbor tax base, the value of taking risks decreases rapidly. So I'd like to look at this document and note that an oil spill in the Columbia Gorge and your own river, the risk isn't quantified, and there's no mitigation for it, and the risk is not justifiable.

Grays Harbor doesn't have the right to put these risks off on the rest of the Pacific Northwest. Please deny the permits.

Response GP575-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP576, **Pokorny, Tamara**

Comment GP576-1

Dear ICF and Co-Leads, Grays Harbor isn't an appropriate location for these oil terminal projects, Westway and Imperium. The risks are far too great and the "rewards" are much, much too small. These projects would wager existing jobs, vibrant habitats, iconic wildlife and innocent children's

lives here for the sake of corporate profits elsewhere. As others have remarked, worse projects for this location are difficult to imagine. City of Hoquiam and Co-Leads, take to the high ground and deny these permits. Let's not conspire against the Harbor, the Coast and the people of Washington State by allowing these projects to go forward and inevitably exacerbate climate change, degrade air and water pollution, undermine existing jobs, and recklessly expose oil storage and transfer facilities to earthquakes and tsunamis. The scale of potential catastrophe is truly breathtaking, but the EISs irresponsibly and consistently downplay the risks. These project proposals should already be dead in the water. Thank you.

Response GP576-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP577, **Pout, Rozanne**

Comment GP577-1

I have lived in the Pacific Northwest all my life. I love it. Aberdeen is one of the two major access points to the Olympic Peninsula. Last week I made a trip around the entire Peninsula on focal buses, beginning and ending at Olympia.

Aberdeen is already a bottleneck area for cars and trucks and buses passing through the town and its sister1 Hoquiam. I would hate to experience the stalled traffic if the proposed terminals are construct6ed along the harbor edging these towns.

I have stood on the shore of Grays Harbor when a migration of shore birds made a stop to rest and feed on their trip north in the spring. Will these birds find a place to land when the beach is covered with crude oil?

Response GP577-1

Comment acknowledged.

GP578, **Powell, Mark**

Comment GP578-1

Hello, thanks for having this meeting. It's important to let everybody give their view. My name is Mark Powell. I'm a shoreline owner, an oyster farmer, and president of the Grays Harbor Oyster Association.

I think that we all agree that if somebody only washed 85 to 90 percent of your car, you would not call that clean. So I guess my point is that we shouldn't really call this cleanup because you're effectively not cleaning up.

Ninety percent, 80 percent, 50 percent is enough to put shellfish growers out of business. Tar sands crude doesn't float, can't be boomed. It will roll around in the tides for eternity.

In the EIS I did not notice anything that said anything about the proximity of the rails to the several schools just in our county, let alone all the other counties these rails have to go through that are within these blast zones. I think it's a huge oversight not taking into account our children.

Response GP578-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on public services.

Comment GP578-2

My last point I'll make is DEIS project initially created waterways. If we dig any further, they will want to bring in more boats, even bigger boats and their wakes will erode our shorelines.

Thank you.

Response GP578-2

The proposed action would not require dredging or deepening of the navigation channel to accommodate proposed vessel traffic.

GP579, **Prentiss, Alex**

Comment GP579-1

If these terminals are approved, about 25 million gallons of volatile Bakken crude oil would be transported in unsafe rail cars every day through the Columbia River Gorge. ... Several oil trains have derailed and exploded in 2015 alone. In 1988, one year before the Exxon Valdez, an oil barge spilled 231,000-gallons of oil near Grays Harbor, fouling beaches from Oregon to Vancouver Island and killing 56,000 sea birds." -Friends of the Columbia Gorge Are we out of our minds? Do NOT allow trains to travel through the Gorge under any conditions. The Columbia River Gorge National Scenic Area deserves to be protected as the national treasure it is.

Response GP579-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP580, **Prentiss, Geoff**

Comment GP580-1

I ask that the FEISs thoroughly address all of the projects' potentially adverse impacts to San Juan County's water environment, economy, and all of its species (human and otherwise). I ask that the FEISs address all potential adverse impacts to all the 119 species-at-risk in the Salish Sea, their migratory pathways and their critical habitats.

I ask that the FEISs thoroughly address oil spill risk and associated adverse impacts to tribal treaty protected rights in the Salish Sea, and all adverse impacts to tribal, commercial, and recreational fishing and shell fishing.

Response GP580-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

Comment GP580-2

I ask that the FEISs require oil spill contingency plans to include the proper equipment and personnel to respond to a spill of the especially volatile, sinkable, and toxic Canadian oil sands/bitumen crude. Please study the impacts of a spill of this particular type of oil. Please identify worst-case spill scenarios and the associated cleanup costs of this particular type of oil.

Response GP580-2

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for

Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Comment GP580-3

I ask that the FEISs include cost-benefit analyses for all the cities and counties that would be affected by the proposed projects, including the costs associated with oil spills, and Canadian oil sands/diluted bitumen spills in particular. I ask the FEISs to include a cumulative impacts analysis of all existing, new, and "reasonably foreseeable" (proposed) vessel traffic in the Salish Sea. PLEASE CONSIDER THE LONG TERM IMPACTS NOT JUST ECONOMIC PRESSURES/INCENTIVES>>> cleaning up the messes made always outweigh the short term gains. Thanks.

Response GP580-3

Refer to Response to Comment GP580-1 regarding the scope of analysis in the extended study area.

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns*, reflects additional information on the economic and social costs of oil spills. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP581, **Proctor, Gary**

Comment GP581-1

I am opposed to building these oil terminals that will drastically increase oil train traffic in Washington. The federal government predicts trains with crude oil or ethanol will derail an average of 10 times per year. In 2013, 462 million barrels of oil was spilled from trains in the U.S. North Dakota oil & Canadian tar sand oil is more unstable and dangerous than regular crude & should have special handling. These projects threaten our coastal water ways and marine resource dependent jobs. This is not the way to reduce our carbon impact.

Response GP581-1

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections

4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

GP582, **Quigg, John**

Comment GP582-1

I AM IN FAVOR OF THE PROJECTS ASSUMING THE RAILROAD FOLLOWS THROUGH WITH TRAFFIC ISSUES. THE RAILROAD MUST IMPROVE THE SPEED THROUGH TOWN AND USE OFF HOURS FOR SWITCHING. BREAKING THE UNIT TRAINS IN HALF WOULD LIMIT BLOCKAGES.

Response GP582-1

Comment acknowledged.

GP583, **Rabaglia, Melanie**

Comment GP583-1

Thank you, folks, for letting us speak to you. My name is Melanie Rabaglia. I live here in Elma. Matter of fact, if I step out on my back porch up on the hill I can see the top of the towers.

To get here I have to go across the train tracks that you think that this is going to happen on, and across the lovely Chehalis River that this will all go right past, where I fish all the time.

Right now it's fishing season for silvers. And we have to kick back our kings because we haven't been able to meet the escapement rate. So the kings are in danger. And now I hear that you think you want to run trains down the river, more of them.

If you want to increase the facility you're going to increase train traffic. You're also going to increase boat traffic. You increase the risk. More than likely things are going to happen. Spills. The possibility of explosions, quote/unquote, accidents, things that the company says that they control that have good reference. Yeah, right. Things happen.

Response GP583-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP583-2

Earthquakes, tsunamis, things they can't control. What happens when an earthquake happens and a tsunami takes out all of those facilities? More chances bad things are going to happen to our river, which is our economy.

Response GP583-2

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP583-3

What's going to to happen to all of the jobs that happen here? This may increase jobs, but what happens to all the jobs that get wiped out when all of the oil hits and the fire hits and the fire hits the schools that go right by here in Elma, you know, not even more than ten miles from where the facility is? They can blow up our town.

Response GP583-3

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP583-4

Once again, it's not if, it's when. The odds are it's going to happen. Each time another train goes by and I sit there at the track and watch these oil trains go by. And I sit there and I go, when is it going to happen? When am I going to have to get up in the middle of the night and evacuate, and cannot because the train will be blocking the way.

Response GP583-4

Comment acknowledged.

GP584, **Ramos, Jean (Quinault Indian Nation)**

Comment GP584-1

I'm Jean Ramos. I'm an enrolled Quinault tribal member from Queets. It's in Jefferson County, but I'm against oil in Grays Harbor County because Quinault Reservation is on Grays Harbor.

And how I feel is that our ocean, and our land, and our rivers, and our lake don't belong to the Quinault Indian people. The Quinaults belong to the rivers, and to the lake, and to the ocean. We've lived in harmony with nature from time immemorial. We haven't had oil here before and we don't need it here now.

This land was gifted to us and it's greed that's taking it away from us. And we can't let big oil -- the infrastructure at Grays Harbor is crazy. I mean, the bridge is already falling down in Hoquiam. And we can't be bringing massive trains across those old trestles ruining our clams and our fish. They're already getting wiped out from greed.

We need to protect our land. And that's what I believe. We're the caretakers of the land and so we should take care of it.

Response GP584-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP585, **Rapp, Fred**

Comment GP585-1

RECEIVED NOV 2 4 2015

To: Westway and lmperium Terminal Services Expansion Projects EISs I live in Elma, WA and have trains going through every day.I understand the heaviest cars are those with grain. Hundreds of cars loaded for export go through daily. WE have lived through the fear mongers who killed the Nuclear power plants at Satsop. Now the anti people are trying to sell us on the idea that because there have been spills in Canada and Georgia, we should live with the fear that it will happen here. I secured the report from the State of Washington about spills that have occurred in our state the last three years. The largest spill I saw on the report appeared to be at a refinery in Skagit county.It appeared that most of the spills were with either commercial or recreational boats. Of the spills on land, trucks seemed to have the most. Our Railroad, Puget Sound and Pacific, has spent millions of dollars to be sure they don’t spill and can run safely and efficiently. Our EPA has been very effective in keeping us safe and clean. This review is trying to determine if we can safely process more oil, it appears to me that we are doing an excellent job.

The anti-people were successful in stopping the Nuclear plants at Satsop. This same plant was built in Texas, safely and within the budget. We have heard no problems from it. 90% of the power in France is Nuclear. How long has it been since we have heard any problem with them? These two companies have proven over many years they know how to handle the cargo they store and ship. Washington is far ahead of many of the states in protecting our environment.I believe that fear mongers are simply trying to make it impossible for our industries to expand. Than. you for listening. Fred Rapp P.O. Box 270 Elma, WA 98541 360 4812842

Response GP585-1

Comment acknowledged.

GP586, **Rast, Darrel**

Comment GP586-1

Dear Consultants, Ecology and City of Hoquiam. The residents of the State of Washington have the collective right to decide which risks they are willing to accept and which they are not, and just because some dangerous projects have been permitted in the past doesn't mean we should approve of more of them.

I urge you to reject the oil terminals proposed in Grays Harbor because one single spill is unacceptable. It really doesn't matter how much preparedness goes into a project. Sooner or later, oil from these projects will make a mess of our beaches. Once a spill occurs, the damage is done and any attempts to fix it are just bandaids. Why would we sign up for this?

The amount of money that would come into the economy is simply not enough compared to the risks to our quality of life. Please do not approve these terminals. Thank you. Darrel Rast Vancouver, WA 98682 robert61285@yahoo.com

Response GP586-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP587, **Rathbone, Lora**

Comment GP587-1

I live in the Tri-Cities through which the oil trains travel, and am concerned about their safety.

Response GP587-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 further describes the potential risks associated with rail transport in this area.

Comment GP587-2

I also think that we need to slow global warming and save our oil for future generations, and not export it.

Response GP587-2

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment GP587-3

I agree with the League of Women Voters that expanding oil storage, as well as transport of oil by train, creates unacceptable risks to public health and safety due to

-the unpreparedness of first responders in case of an accident

-the inability of the railroads to pay clean-up and mitigation costs, and

-the impossibility of remediation at any price while increasing carbon pollution, worsening climate change and delaying the needed switch to clean renewables.

Response GP587-3

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS.

GP588, **Rattie, Marcella**

Comment GP588-1

Marcella M. Rattie Elma WA 98541

My comments relate to both the Westway and Imperium Draft EISs

Kindly see enclosed copy. Marcella Rattie

October 25, 2015 Elma, Wash. 98541
Westway and Imperium Expansion Projects Draft EISs, c/o ICF International 710 Second Ave, Ste. 550 Seattle, Washington 98104

We are 5 generations living in Grays Harbor----Elma to be exactly. We have survived floods earthquakes, eruption of Mt. St. Helens, and fires which can be very devastating. But nothing like a train carrying crude oil into our city could do with a spillage and subsequent fire. We live on a dead end street in Elma. The train tracks go through the town and completely isolate the north side of town as it travels through and when it stops----there is NO way out for some 800 or so people on this north side of town. That would include us. We are literally trapped. The train travels within 1 block of the Elementary school and 3 blocks from the middle school and High School. A spill and fire would subsequently risk many lives with devastating results.

Our property value will most certainly depreciate as well as others near the tracks or on the North side of the tracks. This is a country town where the train travels through all residential area. The toxins and pollutants emitted from the crude oil is not without health risks Persons with asthma, copd any lung disease-----the children out at recess while the train passes----all a health risk. Do we have First Responders trained for such a disaster that could happen? I know with the other many rail accidents in the United States and the deadly Canadian accident---they were not prepared and had to let it burn out by itself. It was unsafe even for the First Responders. Actually we all know that there are NOT trained personnel that could handle such a disaster. In case of a spill-------well, it took weeks and weeks for them to clean up the grain spillage on Devonshire Road in Montesano, Washington and also, the Aberdeen 2014 spillage-------that too, took days.

This will in no way improve our own economy. Westway and Imperium will certainly have a lock on that and bring their own people, like all big corporations do.

An oil spill here on Grays Harbor would devastate our streams and our wildlife. With all the recent disasters in the U.S. And Canada----the risk is just too much and our emergency services are not prepared for such an event. It might be noted the trains are 1 to 112 miles in length which is our case would completely impact our whole town and cuts it in half.

I have always said "It is not a matter of IF a Crude Oil spill should happen-its a matter of WHEN."

Sincerely, Marcella M. Rattie' Box 523 Elma, Washington 98541

Response GP588-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP589, **Ray**

Comment GP589-1

Yes, good afternoon. My name is Ray (Inaudible), I live in Seattle, but I am going to read a letter on behalf of City Council President from Spokane, Ben Stuckart, who is unable to be here today.

Dear Officials: We are deeply concerned about the potential danger of these proposed terminals proposed to the City of Spokane. This is an issue our City Council takes very seriously. In fact, the Council unanimously supported and adopted the resolution calling for stronger oil transportation regulations and protections.

This unanimous public stance by Council came on the heels of multiple explosion and derailments across North Carolina. We are aware that Spokane as a regional hub could be impacted significantly by these terminal proposals.

Our city understands and values our nation's rail transportation system, we support our friends and colleagues utilizing our state harbor system and their effort to provide good quality jobs for the citizens.

We also support a business's right to conduct legal commerce to seek a profit.

The bottom line is that we just want to know how it affects the citizens of our city. We urge that you include the impacts to the city of Spokane in your Environmental Impact Statements for Westway and Imperium Terminal projects.

Thanks for considering our input on this matter. Sincerely, Ben Stuckart, President, Spokane City Council. Thank you.

Response GP589-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP590, **Ray, Barbara**

Comment GP590-1

Dangerous crude oil would travel on mile-long trains through the Columbia Gorge and out over the Olympic Peninsula to Grays Harbor.

Building more fossil fuel capacity will only delay the transition to the clean, renewable energy economy we need to safeguard the climate.

Response GP590-1

Comment acknowledged.

GP591, **Reames, S & J**

Comment GP591-1

Please don't allow these oil storage facilities in our town. This will destroy our environment, property values, and put us in great danger.

Response GP591-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP592, **Regan, Danna**

Comment GP592-1

I am submitting the following attachment on behalf of Danna Regan who told me her story at a community event in August. She wanted the experience of Skykomish to serve as a warning to Grays Harbor. Robin Moore, Hoquiam

ATTACHMENT #1

From Danna Regan, as told to Robin Moore:

I used to visit my sister in Skykomish, in the late 80's. There was bad contamination with grease and oil from whatever the trains were hauling. You couldn't breathe outside. I had to walk uphill on tar-like deposits to get to my sister's house. There was hardly any vegetation, even the trees were dying.

My sister was afraid for her unborn child, so moved away. Most of her friends moved too. The whole town had to be torn down and moved because of the contamination.

Just think what would happen here, to fisheries and seafood. Tourists would not want to come. The entire coast would be a ghost town.

Response GP592-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP593, **Rhodes, Dusty**

Comment GP593-1

My name is Dusty Rhodes.

Thank you for this opportunity to testify on such a vital issue that affects not just the Chehalis River basin or the State of Washington, **but ultimately the entire Earth.**

I was born in Spokane, raised as an Air Force brat, and served five years as an Army officer during the 1960s. I have lived most of my life in Olympia, and I retired 15 years ago following 32 years of service in state government.

My home sits about a 1/4 mile from the main north-south rail lines that serve the West Coast corridor. From my house I can see the train-trestle that crosses Pattison Lake, and, while walking my dog by the grade-level crossing, I frequently encounter oil-trains of 100-plus cars. My wife and I live well within the blast zone and it is terrifying to imagine the consequences should we and our neighbors become the victims of an explosion from one of these trains like the July 2013 oil-train explosion and fire in Quebec that killed 47 people and incinerated the town of Lac Megantic.

However, rather than testifying on the inadequacies of the Draft Environmental Impact Statement (DEIS) for these projects, which address primarily local and regional concerns, I want to tell you why I believe that this DEIS, as well as EVERY DEIS for EVERY project EVERYWHERE, needs to have a GLOBAL PERSPECTIVE as its primary focus, and that regional and local concerns should be treated as secondary issues.

Ours is the first generation to experience the growing consequences of global climate change. From the very beginning of the Industrial Revolution until the last few decades we failed to recognize the gradual, but ultimately lethal, impacts that industrialization was having on the Earth's Biosphere. Had human population remained near pre-industrial levels, the Biosphere, like the proverbial Timex watch, might have been able to tolerate the environmental damage we have inflicted and kept on ticking. But, with the synergistic effects of industrial growth combined with exponential population growth and rising per-capita consumption-we have unwittingly created a toxic recipe for spinning the Earth's climate out of control. Indeed, we are plunging all future generations into a hell on earth, unless we begin making more sustainable choices.

Our current plight results, in part, from our own complacency. But it is also a part of the fallout of the US Supreme Court's "Citizen's United" ruling, which allows virtually unlimited amounts of individual and corporate political campaign spending. This means that, to be elected, far too many of the politicians now in control of the US Congress are compelled to seek massive campaign contributions from deep-pocket billionaires and corporate donors. These politicians are, therefore, beholden to their big-money backers, often to the detriment of ordinary citizens and the country as a whole.

Therefore, it falls to us, as citizens who recognize the seriousness of the situation facing the world, and who are not corrupted by big-money billionaire and corporate handouts, to take action at the local and regional level to force intelligent decision making from the bottom up! This brings me back to the reason so many of us are here tonight- urging you to see the bigger picture and to act accordingly.

The only question we should be asking about this DEIS and about every DEIS for all new projects everywhere on the planet is: *"Will this project further burden the Earth's ability to sustain the ecosystem upon which we and all other life depend?"* If the answer is "NO" then the project should be considered for approval. If the answer is "YES" then it should be denied outright. Period!

This is the last decade in which humanity still has a chance to avoid the ever-increasing and dire consequences of catastrophic climate change. All of us, but especially you, as our elected and appointed public servants, must step up and take responsibility for safeguarding our collective future. Ours is the first generation of humanity to experience the consequences of human-caused

climate change, and the last generation that can do anything about it. If we act now, we may just have a chance to minimize or perhaps even reverse some of those consequences. Otherwise, future generations will forever curse us for having had the knowledge to foresee the perils that lay ahead, but lacking the willpower to stem our own greed. Will we condemn them to live in a hell of our making that we could have prevented? I seriously hope not!

If you have any doubts about what I have said thus far, or any reservations about what actions to take, or how to explain those actions to your constituents, I urge you to read three, newly published, best-selling books. The first is:

1) This Changes Everything - Capitalism versus The Climate by Naomi Klein. This book, which is also being released this month as a documentary film, exposes the myths that are clouding the climate debate and explains why our addiction to profit and growth are digging us in deeper every day. The second book is:

2) Countdown by Alan Weisman, which addresses four critical questions aimed at determining how many people our planet can hold. And the third book is:

3) Merchants of Doubt by Naomi Oreskes and Erik M. Conway. This book, also released as a documentary film earlier this year, shows how a handful of scientists obscured the truth on issues from Tobacco smoke to global warming.

These three scholarly works are timely gifts to humanity and, in my view, they should be required reading by every literate person on the planet, especially those holding leadership positions, such as yourselves, and those in the media. If, after reading these books, you are not perfectly clear on what actions you must take, then you will at least be more aware of what is at stake and what additional answers you must seek.

Just last week, as two major news disclosures were made, we learned, yet again, that big corporations cannot be trusted. First, ExxonMobil's own scientists revealed that scientific research they conducted for Exxon during the 1970s and 80s proved that fossil fuels were warming the planet. So what did Exxon Mobil do? They proceeded to bury their own research and began funding climate change denial front groups. Second, Volkswagen, once the world's most trusted automaker, admitted that they intentionally installed, into 11 million vehicles, software that was designed to fool the regulators and hide the fact that those vehicles were generating up to 40 times the amount of pollution claimed by Volkswagen.

Each of the various oil and gas infrastructure projects that are currently being proposed on Earth simply adds to the burden that humanity is forcing the Earth's Biosphere to bear. The May 6, 2014, National Climate Assessment tells an unambiguous story: The planet is warming, and over the last half-century this warming has been driven predominantly by the burning of fossil fuels like oil and gas. If we are serious about avoiding the most catastrophic impacts of climate change, then we must keep dirty fuels like oil and gas in the ground. And we must protect fragile areas like Grays Harbor and the Chehalis River Basin, that are each vital parts of the Biosphere's web of life.

The massive oil spill in the Gulf of Mexico devastated, and continues to haunt, that region. Don't risk the same fate, and worse, for Grays Harbor and the Chehalis River Basin by opening these regions to even more unsafe oil and gas transportation. The push to allow more oil and gas infrastructure development only perpetuates our dependence on harmful fossil fuels, and it makes no sense whatsoever. Instead, we need to invest our efforts and resources into green-energy research, development and deployment.

Just as one swing of an axe ultimately weakens even the strongest tree, we must view this project as if it is just one more swing of an axe aimed at the Earth - the ultimate Tree of Life.

I ask you to do the responsible thing and say "NO" to these applications.

Thank you.

Dennis "Dusty" Rhodes
5113 Atchinson Drive SE
Olympia, WA 98513-4528

Response GP593-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP594, **Rhodes, Dusty**

Comment GP594-1

Thank you for this opportunity to testify on such a vital issue. My name is Dusty Rhodes. I was born in Spokane and have lived most of my life in Olympia after serving five years in the Army.

My home is less than a quarter mile from the main north/south rail lines that serve the West Coast. I can see the dual track trestle that crosses the narrow part of Pattison Lake from my home, so my wife and I live well within the blast zone.

I frequently see 100-plus oil-car trains while walking my dog. It is terrifying to imagine the consequences of an explosion and fire from one of these trains.

I realize that you are under enormous pressure from the oil and gas industry and others to approve these projects, but I hope you will find the strength and wisdom to stand up to the pressure and say "No" with the full confidence that you are doing the right thing.

The oil and gas industry already has five tons as much oil and gas reserves in the form of their identified in-the-ground assets, as can be safely burned without dumping far more greenhouse gasses into the atmosphere than the atmosphere can ever handle without spinning out of control. Rather than pouring more energy and resources into expanding the oil and gas infrastructure, we should be investing all our efforts and resources into green-energy research, development and deployment.

We are currently in the last decade in which humanity still has a slim chance to avoid the ever increasing consequences of catastrophic climate change. All of us, but especially you, as our elected and appointed public servants, must step up and take responsibility for safeguarding our collective future. Ours is both the first generation of humanity to experience the consequences of human-caused climate change, and the last generation of humanity that can do anything about it and, with luck, we may have a chance to minimize or reverse those consequences.

Response GP594-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP595, **Rhodes, Dusty**

Comment GP595-1

Thank you. I said earlier that ours is both the first -- Dusty Rhodes, by the way.

Ours is both first generation of humanity to experience the consequences of human-caused climate change, and the last generation of humanity that can do anything about it. And with luck we may have a chance to minimize or reverse those consequences. Otherwise, future generations will forever curse us for having had the knowledge to foresee the perils that lay ahead, but lacking the wisdom and will to stem our own greed, thus condemning them to live in a hell of our making what we could have prevented.

If you have any doubts or reservations about what actions to take or how to explain them to your constituents, I urge you to read two best-selling books. One is This Changes Everything - Capitalism vs. The Climate by Naomi Klein; and the second one is Countdown, by Alan Weisman. These two scholarly works are very timely gifts to humanity and should be required reading by every literate person on the planet, but especially by those holding leadership positions.

If, after digesting the wisdom of these two books you are not perfectly clear on what actions you must take and what decisions you must make, then I fear all hope is lost.

All of the oil and gas infrastructure projects that are currently being proposed are at odds with fighting climate disruption. President Obama and his administration have done more to combat climate change than any other in American history. The May 6, 2014 National Climate Assessment tells an unambiguous story. The planet is warming, and over the last half century this warming has been driven predominantly by the burning of fossil fuels like oil and gas. If we're serious about averting an additional two-degree temperature increase and avoiding the most catastrophic impacts of climate change, we have to keep dirty fuels like oil and gas in the ground.

Response GP595-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP596, **Rhodes, Dusty**

Comment GP596-1

My name is Dusty Rhodes again. And I have written a song with new lyrics to an old song of Bob Dylan's that I think is appropriate for these times, and I would like to sing it for you and ask that you kind of hear the message behind the words even.

So, anyway, the song is called The Climate on Earth is a Changing.

(Playing guitar and singing.)

Response GP596-1

Comment acknowledged.

GP597, **Rhodes, Dusty**

Comment GP597-1

Hi, I'm Dusty Rhodes from Olympia. And I have five minutes' worth of testimony, but we only have a couple minutes. I'll just say that I believe it falls to us as citizens to recognize the seriousness of this situation, which is what's happening all over the world, and who are not corrupted by big companies' billions and corporate handouts to take action at the local and regional level to force intelligent decision-making from the bottom up.

The only question we should really be asking about this DEIS and every DEIS or all new projects everywhere on the planet is: Will this project further burden the earth's ability to sustain the ecosystem upon which we and all other life depend? If the answer is no, then the project should be considered for approval. If the answer is yes, then it should be denied outright.

Just last week, two major disclosures were made. We learned, yet, again, the big corporations cannot be trusted. First Exxon Mobil's own scientists revealed scientific research that they conducted through 1970s and '80 proved that fossil fuels were warming the planet. So what did Exxon do? They proceeded to bury their own research and funded climate change denial groups.

Second, Volkswagen, one of the world's trusted auto makers, they intentionally programmed the vehicle's software that was designed to fool the regulators to hide the fact that those vehicle were generating up to 40 times the amount of the pollution.

Just as one man's swing of the axe weakens even the strongest tree, you must view this project as it is just one more swing of the axe to the earth, the ultimate tree of life. I urge you to do the responsible thing and say no.

Response GP597-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP598, **Richrod, Alan (City Council of Aberdeen)**

Comment GP598-1

Pertinent to state law I hereby enumerate and present my objections to granting permits to the proposed petroleum storage facilities in Grays Harbor County. The Department of Ecology is staffed with competent and scientifically minded people and therefore I need not remind you of the overwhelming importance of compliance with SEPA. Nonetheless, for the record, I shall do so: Under SEPA, a full environmental impact statement is required for any action that has a significant effect on the quality of the environment. Significant means a "reasonable likelihood of more than a moderate adverse impact on environmental quality." Further, one cannot ignore the simple fact that some compounds form a far more devastating effect on the environment than others volume for volume. Spilling the contents of a dozen train cars full of soybean meal would cause a small disruption in the train yard and would require people with shovels clean it up. However, half as many railcars of crude oil, even "stabilized" crude oil, would devastate the aquaculture of the entire region. Storage of this type of petroleum product represents a more than simply significant risk to the public and economic well-being of a population far greater than that of the city of Hoquiam. At stake would be

millions of dollars in commerce and thousands of jobs in the seafood industry. The city of Hoquiam is the only city considered in the DEIS. However, that city is centered in the vast area that is affected by port activity including the proposed terminals. The city of Hoquiam does not exist in a vacuum. I am certain that you are not even considering that the effects of a spill would be relegated to an area defined by its city limits.

Response GP598-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. This includes the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. However, as noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP598-2

Historic oceanographic studies, including some conducted by NOAA, show that tidal and river currents in Grays Harbor move so quickly that a spill in Aberdeen or Hoquiam can inundate the beaches of the North and South Shores within 12 hours. Hydrological and spill activity do not recognize the arbitrary scope of the DEIS. So for this reason, that far more economic and social value is at risk than outlined in the DEIS, I strongly urge that these permits be denied and these projects proceed no further.

Response GP598-2

For additional information about the analysis of risks in the extended study area, refer to the Master Response for the Geographic Scope of the EIS. Draft EIS Appendix N, *Oil Spill Modeling*, acknowledges the limitations of the GNOME model, including that the model does not provide the ability to depict the movement of oil up and down the coast outside of Grays Harbor. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP599, **Richrod, Alan (City Council of Aberdeen)**

Comment GP599-1

My name is Alan Richrod. I'm the 5th Ward council member for City Council for the City of Aberdeen. We're sitting now smack in the middle of 5th Ward. And the train tracks are about two blocks away. Of the dozens of inadequacies and inconsistencies in the DEIS I shall speak to one.

According to the leading industrial insurance actuary, the amount of coverage in the available personal insurance market is completely insufficient to cover the worst case oil spillage scenarios such as Lac-Magantic.

In researching worst case scenarios, I found that the people in the insurance business, whose job it is to make sure that they know such things, tell us that there is not enough coverage anywhere in the world to handle such situation.

So, if there is not sufficient insurance coverage to cover these accidents, who does cover it? In all cases, taxpayers. As near as I can find, any indication of disaster involving crude oil, the cost of mitigation, that is cleanup and returning it to the original state, which scientists involved in such things say it can't actually be done. In every case of disaster involving crude oil, a clause in mitigation exceed the payoff for it by the government and the companies involved.

I, as elected official and representative of the people of the City of Aberdeen, cannot subject my city to that sort of potential danger and predictable expense. I will submit further commentary in writing.

Thank you for your time.

Response GP599-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP600, **Rickman, Sharon**

Comment GP600-1

Dangerous Crude Oil Terminals Proposed in Grays Harbor will have unavoidable and significant adverse impacts, and should not be built. Do you realize that every science academy on the planet urges us to transition away from fossil fuels as soon as possible? We cannot do that by building new infrastructures. What are you doing in response to the Washington State Department of Fish and Wildlife stating “Grays Harbor is an area particularly sensitive to the adverse effects of oil spills.” A major oil spill could devastate marine resource jobs which support more than 30% of Grays Harbor’s workforce according to a 2013 study by the University of Washington. An economic study commissioned by the Quinault Indian Nation found that a major oil spill could put more than 150 tribal commercial fishermen out of a job, resulting in a direct loss of as much as $20 million in wages and up to $70 million in revenue for affected businesses.

How can you move forward on this project knowing that 14 of the last 16 oil train derailment spills have caught fire? It is most certain that a spill will happen in Washington State. Please hold agencies accountable and demand them to quantify the risk of an oil train spill and fire for the entire round trip. The proposed oil shipping terminals and the dangerous oil trains, storage tanks, tankers and barges that would come with them puts the health and safety of people, the local economy, and our ocean and coastlines at risk.

There is no way to mitigate the risks and dangers of these crude oil terminals. Grays Harbor communities would take on the risk, oil companies would reap the profits, and Grays Harbor would become a throughway for oil going elsewhere to places like California and even overseas. If you insist on proceeding with these projects, I urge you to make a comprehensive study of the cumulative impacts for all the communities impacted in the state of Washington.

Response GP600-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and for information on the likely destinations of crude oil shipped through the proposed facilities.

GP601, **Riley, Mary**

Comment GP601-1

Comment for DEIS on Proposed Westway Terminal Expansion:

Table 6 of Appendix G, "Cumulative Noise Impacts," shows 103 grade crossings requiring a horn warning. The table counted 756 moderate impacts and 253 severe impacts. How would it be possible to mitigate these disturbances?

I live in Hoquiam, very near the site of the oil terminal project to be built at Terminal Three. I believe that the impacts associated with noise will be a problem to myself and my neighborhood, which includes three schools. There is also the wildlife refuge even closer to the project site. Sleep interruption is not just an interruption of comfort and rest. It is a health problem contributing to hardening of the arteries. Animals and birds are affected in ways we do not understand by lack of proper sleep. Students have their attention interrupted by loud and unpredictable noises like train horns.

The data from the Westway DEIS is applicable to the Imperium project as well as that at Terminal Three. The data cannot be accurately considered in isolation. The profitability to the three companies involved depends on their combined product volume. Has the cumulative impact of increased noise been considered by the permitting agencies?

It seems unlikely that any existing technology can adequately mitigate this problem.

I believe the "No-Action Alternative," page 2.16, is the only realistic conclusion for Hoquiam and the State to come to.

Response GP601-1

Draft EIS Chapter 6, Section 6.5.2, *Noise and Vibration*, addresses the cumulative impacts of the proposed action, the REG (formerly Imperium Terminal Services) Expansion Project, and the Grays Harbor Rail Terminal Project.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP602, **Ritter, John**

Comment GP602-1

The Columbia River Gorge is the LARGEST NATIONAL SCENIC AREA IN THE UNITED STATES* The transporting of coal, oil, and any other toxic material in large quantities should NEVER be allowed and strictly limited…. It is amazing to me that this proposal is even being considered.

Response GP602-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP603, **Ritter, John**

Comment GP603-1

Oil trains traveling in large numbers (in any number) through the Columbia Gorge ---THE LARGEST NATIONAL SCENIC AREA IN THE UNITED STATES ----- should NEVER be allowed to happen .--The risks are way to great! Please do not allow this to happen

Response GP603-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP604, **Robertson, Joelle**

Comment GP604-1

My name is Joelle Robertson, but I'm speaking on behalf of John Snyder, who is a council member in the city of Spokane. While the proposed Westway and Imperium projects are not close to the city of Spokane, they still have the potential to negatively impact our city in many ways.

A mainline for the BNSF Railway comes through the middle of our downtown corridor. As it is, we already see four or more oil trains coming through our city every day. With the proposal before us today, that would add at least two more oil trains to our daily rail traffic. Due to this I felt compelled to share the concerns of the community.

Over the past several years we've seen the massive impact a derailment can have. The Lac-Megantic in Quebec in July of 2013 killed 47 people and destroyed the center of the town. Since then there have been documented at least ten major derailments where train cars have exploded.

Data from the Pipeline and Hazardous Materials Safety Administration shows a large increase in the amount of oil spills. In 2013, more oil was spilled from train cars than the entire time period from 1975 to 2012.

Much of these spills came from the trains carrying Bakken crude which the Pipeline and Hazardous Materials Safety Administration and the Federal Railway Administration concluded has a higher gas content, higher vapor pressure, lower flash point and boiling point and thus a higher degree of volatility than most other crude in the U.S.

I will submit the written document.

Response GP604-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

GP605, **Robinson, Cheryl, BSN, RN**

Comment GP605-1

As a school nurse, I am concerned also about the adverse impact of oil-by-rail on families and health.

Response GP605-1

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe the potential human health impacts that could occur as the result of an oil spills, fire, or explosion.

GP606, **Robinson, Joelle**

Comment GP606-1

Hi. My name is Joelle Robinson and I'm from Seattle. I am here as my own concerned citizen, but I'm reading today on behalf of Candy Monsette, who is a member of Mandan, Hidatsa and Arikara Nation in North Dakota. And she is with the Native Energy and Climate Campaign and also the Indigenous Environmental Network. This is a public comment on the DEIS for Westway and Imperium. In my home town of New Town, North Dakota, life has changed forever because of fracking and the lust for oil. The horrible thing is that it's changed for the worst. This is no modern day (inaudible). This oil booming, as in fracking, has become devastating for us and no amount of money can ever give us back what has been lost. Many in our own communities have died because of accidents. With the hundreds of tracks that are taking over the roads, our land is being sterilized, our water poisoned, and our air tainted imperatively. Our culture has taken a back seat to strangers populating the land, many with our contentions. Rape of both men and women is on the rise, along with things we've

never dealt with before such as sex trafficking of young teenagers. Heroine abuse runs rampant as the big city drug cartels move in and our once quiet town of 1500 is now a dangerous and scary place to be, let alone to raise a child. My daughter is 15 months old and my heart aches that I do not even want her to be at home for fear of what she would be exposed to. Murder is not a word we came across in our town before the oil boom. Now we will just wait for the next and the next as many have been murdered -- yes, murdered in our little communities -- I can finish the sentence and then hand it to my colleague?

MR. KEILLOR: Yeah, we'll have to have you wrap up immediately, and we'll get to the next speaker.

SPEAKER 4: In our little communities much of it is associated with drugs and the gangs that follow the money.

Response GP606-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP607, **Robinson, Michael**

Comment GP607-1

I am a concerned citizen that can not believe that these two projects would even be considered. Both would allow trains to haul products that would destroy the natural habitats along the Columbia River if there was a wreck. Just imagine what would happen to all of the plants, animals and humans if these trains had a derailment and went onto the river. Then imagine if the oil exploded and the fire followed the river all the through cities.

Response GP607-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP608, **Rolf, Margo**

Comment GP608-1

I am writing (speaking) to express my opposition to the construction of the proposed Westway and Imperium oil terminals for Grays Harbor.

The risks would be placed on many but the rewards would go to just a few. The oil companies would receive greater profits but at what costs? The more oil transported, the greater the danger of oil spills, damage to the harbor and to the shores of western Washington, more air pollution, more tankers in the waterways, more long trains filled with highly combustible crude oil passing by homes, schools, communities and waterways, the impact on the fishing and tourist economies of the area, negative effects on tribal life, and destruction of the beauty of our environment. Does this make any sense? We must not allow further destruction of something so beautiful and putting the safety of so many in greater jeopardy for the profit of a few.

It is not just this area that will be affected. These trains carrying the highly explosive oil will not only be passing through the state of Washington but they will also be passing by every home and family along that railroad track from North Dakota to the Pacific Ocean.

The effect is greater still. Once the oil reaches its destination and is burned, the destruction and harm continue in the form of pollution and greenhouse gases that add to global climate change.

It is time to support forms of clean renewable energy and invest in them, time to create jobs that do not continue to support the dirty, climate-changing fossil fuel industry. It is not time to build one more terminal.

I support the Grays Harbor area in rejecting oil, rejecting oil trains, rejecting oil terminals, rejecting oil tankers and rejecting anyone's right to endanger the environment, the safety and future of our children and grandchildren.

Margo Rolf 29610 2"d Place SW, Federal Way, Washington 98023

Response GP608-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP609, **Roos, Tedine**

Comment GP609-1

October 8, 2015. My name is Tedine Roos and I live in Vancouver, Washington. I would like to say a few words about the extractive economic model which digs, drills and cuts the earth's resources with no concern for the damage left behind. Extractivism is connected to sacrifice zones, places which, to the extractors, can be poisoned and its people destroyed, supposedly for the greater good of economic progress.

Until recently, these places have been relatively small and the people so affected powerless, as in mountaintop removal. Many of the things we all enjoy come from such places. The extraction of tight oil has made these sacrifice zones much larger and more visible.

The marriage of horizontal drilling and hydraulic fracturing in 2006 has resulted in unprecedented destruction of water, the soil, the air and communities in North Dakota and Montana. This area, the Bakken Formation, was inhabited for thousands of years by the Arikara, Mandan, Hidatsa, and the Assiniboine. They grew corn and squash on land that is now Montana and North Dakota. They learned some things about living in an arid area.

About 1910, white man came. These first peoples were sacrificed and the prairie was plowed up. The honey hawkers (phonetic), as they were called, learned in the Dust Bowl '30s, though, to change their ways.

No less than the Economist, a periodical devoted to profit anywhere anyhow, admits that fracking is extremely destructive. But there aren't many people who live there anyway, and the ones who do are living high on the hog with their oil royalties.

This is not exactly true. Surface rights and mineral rights that split the states are separate in that part of the world. The people who own the surface rights and have been dryland farming for 50

years can no longer drink the water, till the soil, or even breathe the air. This land will never again grow food. These people have been sacrificed, just like the Mandan.

The oil trains carrying the Bakken oil, which are not safe, no matter what kind of cars, blow up, and derail, and bring respiratory illness and neurological problems as a certainty, and could incinerate towns and people anywhere along the way. We are all now in a sacrifice zone.

Aside from the horrendous environmental consequences, there have been developments in the last few months which make oil terminals a very unwise endeavor for municipalities.

According to Society of Petroleum Engineers, producers need a price per barrel of at least $80 a barrel. As we know, oil prices have been down for some time and are not expected to go up any time soon.

There have been massive infusions of tax dollars to keep this U.S. Shell industry afloat. But even so, the major producers are expected to be in Chapter 11 by the end of the year.

The sale of U.S. securities, which are loans to the government, have become much more difficult to peddle around the world. China, for one, is unloading U.S. securities lickety-split. The petrodollar undergirds the entire U.S. economy.

Other countries, especially the BRICS nations, are backing away from the petrodollar and trading in their own national currencies. The Bretton Woods Agreement, which made the U.S. Dollar the world reserve currency, is crumbling more every day.

For all of these reasons, smart municipalities get away from fossil fuel terminals as fast as possible. They are clearly stranded assets.

Response GP609-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP610, **Rose, Carol**

Comment GP610-1

I live in Vancouver, WA and am extremely concerned about all the oil trains passing through our community. Every oil train traveling to Hoquiam will pass within a mile of my home.

The greater the number of oil trains the greater the chance of an accident, spill or explosion. Should these occur along the Columbia River, it and the commerce it serves will be compromised or non-existent for years to come. Oil train cars cannot be made crashworthy. Sometime, somewhere there will be an accident. If it's horrific there will be loss of life.

Continued use of oil increases green house gases. We are a state that cares about our environment. Oil does NOT fit into our state. We will go backwards, not forwards in caring for our environment if this project is approved. I worry about the dangerous vapors that may be emitted at the Hoquiam terminal.

The risk is simply not worth any minimal gain in jobs. When there is a spill, an accident, or an explosion, there will not only be a potential loss of life, homes, and environment, but the costs will

be astronomical. The communities these trains will pass through, as well as Hoquiam, will bear the costs. I cannot even begin to understand why businesses are allowed to privatize their profits and yet burden the tax payers of our state with the costs of cleaning up after them, Keep our pristine state safe and clean.

Our citizens care. I care about Hoquiam. I grew up there and graduated from Hoquiam High School.

Response GP610-1

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* presents the analysis of risk of oil spills, fires, and explosions related to rail transport related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Section 4.5.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident along the PS&P rail line. Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including a discussion of the potential longer-term impacts. Final EIS Section 4.3, *Risk Considerations,* reflects additional information about factors influencing cleanup.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP611, **Rose, Shawn**

Comment GP611-1

Name: Shawn Rose
Organization:
City/ State/ Zip: Montesano, WA 98563

I am against oil rail cars coming to G.H. This type of oil needs to be refined in or near where it is collected (Midwest_ and sold here in the states. Not to be shipped out of our Harbor. I live ½ mile from tracks in Montesano and I work about 80 feet from the rail line this oil is rolling time bomb somewhere from start to finish. Not if but unfortunately win. This is one project that must not proceed. I have been fine with the biofuel you have now keep it that way.

Response GP611-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP612, **Rosen, David**

Comment GP612-1

My name is David Rosen and I am a resident of Hoquiam. Pre-retirement I was a volunteer fireman and I wish to comment on the draft EIS for both Westway, at 3.16-30, and Imperium, at 3.16-31,

regarding the findings of "no significant or unavoidable adverse impacts" to emergency services. These findings are false on their face and not based on evidence. None of the fire trucks or ambulances that would be responding to an emergency at the Olympic Gateway Plaza can fit under the bridge or safely use the trails cited in Chapter 3, Vehicle and Traffic Safety. If you don't believe me, go measure them for yourself. Measure the actual vehicles from mirror to mirror and surface to light bar and antenna on top and you will find that the only vehicle that will fit is the Chief's vehicle. Also, go measure the actual trails, the chicanes along the way, the height of the railroad bridge behind the motel, the width of the trails from the concrete barriers behind Marshall's and along the Chehalis and you will see that the actual measurements are very different from those cited in both draft EIS at Westway 3.16-25 and Imperium at 3.16-26. Additionally, industry standard for a small fire truck turn radius is 25 feet to center line of roadway. Ambulance average would need a turn radius of 12.5 feet from the center line of the roadway. None of these is possible on the trails cited as mitigation for emergency access to Olympic Gateway Plaza. Either the companies will have to work out with the railroads a plan to route the trains away from the Olympic Gateway Plaza and complete it prior to a finding of no significant impact and granting approval or the findings for both Imperium an Westway for Chapter 3, Vehicle and Traffic Safety must be changed to unavoidable and significant adverse impacts from the proposals and the permits must be denied for both Imperium and Westway expansion projects. David Rosen

Response GP612-1

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP613, **Ross, Elizabeth**

Comment GP613-1

Name: Elizabeth Ross
Organization: Grandmother
City/ State/ Zip: Aberdeen, WA 98520

We have to go GREEN!

Keep oil in the ground!

I have great grandbabies who need a world to live in!!

Response GP613-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP614, **Rouse-Wilson, Bonnie**

Comment GP614-1

My name is Bonnie Rouse-Wilson. I live in Seattle. I have been a lifelong resident of Washington State. I am a childcare provider for King County. I have been traveling to the pacific coast since I was a child. My sister and her husband have lived in Grays Harbor for 45 years. I am very concerned over the potential takeover of our state by large scale oil interests in this country. Oil Train traffic has increased exponentially throughout the nation and Washington. Proposed new oil terminals threaten to expand that traffic and risk even more. Every oil train that passes through our communities and over our waterways carries great risk that risk only increases as we increase that traffic. Grays Harbor has no oil train traffic or shipments of crude at the present time. The oil projects will bring a new risk to a marine ecosystem that would suffer a catastrophic loss of habitat in the event of a major spill. The DEIS fails to capture the true impacts of the Grays Harbor projects. The DEIS cites several times the risk from a major fire, explosion or spill cannot be mitigated. If it cannot be mitigated it should not be permitted.

Response GP614-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP615, **Ruth, Maria**

Comment GP615-1

Issue: The DEIS for both Westway and Imperium Terminals expansion projects is inadequate in its assessment of the impacts of vessel-transport-related oil spills on the Marbled Murrelet, a species classified as a “special-status” in the DEIS. Proposed mitigation measures are also not adequately addressed in the DEIS. Given that the Marbled Murrelet inhabits waters almost entirely within the proposed project area, permits for this project should be denied until the applicant provides more information on the impacts to the Marbled Murrelet and also specific mitigation of those impacts. Background: Marbled Murrelets (Brachyramphus marmoratus) are small, robin-sized Pacific Coast seabirds protected as a federally threatened species under the Endangered Species Act in Washington, Oregon, and California. It is also state listed as threatened in Washington. Marbled Murrelets spend 95% of their lives in marine waters, usually within three miles (five kilometers) of the shoreline and also in inland saltwater bays, sounds, inlets, and coves. Marbled feed primarily on small, forage fish and pursue their pretty to depths of up to 164 feet. Washington State Population Declines: The latest report shows a strongly negative population trend from 2000-2013 of -4.6% at the state scale. Over this same period, a significant -6.7% decline in population was observed on

Washington's Outer Coast (Northwest Forest Plan's Conservation Zone 2). (Falxa and Raphael, 2015). Zone 2 includes the Westway and Imperium proposed project area analyzed in the DEIS. The DEIS states that "murrelets likely occur in low numbers in the Grays Harbor area." The "low numbers" of Marbled Murrelets in the Grays Harbor area should not be attributed to historic unsuitability of the Grays Harbor area for Marbled Murrelets but as part of the low numbers zone-wide and state-wide In 2001, Washington had estimated 10,454 Marbled Murrelets, in 2014 just 5,000. (Falxa et al, 2015). Impacts from Vessel Transport Oil Spills: Direct Mortality: Given their small size, Marbled Murrelets are quickly covered by oil during oil spill and become hypothermic and drown. Additionally, during the process of preening, Murrelets risk ingesting lethal amounts of the oil and other hazard material on their feathers. Indirect: Marbled Murrelets' feed on invertebrates and forage fish, which include Pacific sand lance, sardine, northern anchovy, immature Pacific herring, and smelt—all of which occur in Grays Harbor and risk ingesting toxins from oil spills. The risk of Marbled Murrelets mortality increases when they ingest contaminated prey. An oil spill in Grays Harbor or within three nautical miles of the shore has the potential to impact many Marbled Murrelets in Southwest Washington—not just the birds potentially nesting in the forest area 30 miles from the project site as described in the DEIS. Cumulative Impacts: Again, the latest population data for the Marbled Murrelet show a strongly negative population trend from 2000-2013 of -4.6% at the state scale. Over this same period, a significant -6.7% decline in population was observed on Washington's Outer Coast (Conservation Zone 2). (Falxa and Raphael, 2015). These impacts are primarily from the loss of nesting habitat but also from mortality from oil spills, nest predation, and decline of forage fish populations. Mitigation: The applicant's mitigation efforts for impacts of oil spills from transport vessels on Marbled Murrelets are inadequate. The Marbled Murrelet is a non-migratory seabird and should not be lumped in with migratory shorebirds for consideration in the DEIS. While both populations of birds suffer potential mortality from oil spills, impacts to the Marbled Murrelets and mitigation of those impacts should be considered separately. References cited: WA-OR-CA: G. Falxa, M. Raphael,.2015 The Northwest Forest Plan—The First Twenty Years (1994-20013) Status and Trends of Marbled Murrelet Populations and Nesting Habitat, Falxa,

Response GP615-1

Draft EIS Chapter 3, Section 3.5, *Animals*, addresses potential impacts of construction and routine operation of the proposed action on animals, including birds such as the marbled murrelet. Chapter 4, Section 4.7, *Impacts on Resources*, describes impacts that could result from potential spills, fires, or explosions. Refer to the Master Response for Mitigation Framework for more information about the development, implementation, and enforcement of mitigation measures.

GP616, **Ruth, Maria**

Comment GP616-1

Good evening. My name is Maria Ruth. I'm from Olympia and I'm here on behalf of the Marbled Murrelet. For those of you that don't know this small seabird is on the list of endangered species on the federal government under the Endangered Species Act.

Its populations are declining in this area of Washington known zone two by 6.5 percent a year. The main cause of bird decline is from logging, but studies have shown since the 1980's that oil spills, catastrophic and chronic, are a major contributor to this bird's mortality.

Unlike larger seabirds, you will never see a Marbled Murrelet oiled on the beach. You will never see a Marbled Murrelet at a recovery location. These are small brown tide birds. They are quickly covered with oil and drown. They never make it to coast and to rehabilitation.

In addition to drowning, they also in the effort of preening and cleaning their feathers from oil, ingest the toxins in the oil and die. In addition to that, oil spills also pollute the fish.

The forage fish that they depend on. They are pursuit divers, and they prey on the small forage fish that are not adequately assessed in the DEIS. The threats to the Marbled Murrelet are not adequately addressed in the DEIS.

The Nestucca spill in 1988 spilled 231,000 gallons of fuel covering 800 square miles from Grays Harbor on out. The mitigation, 2004 is when the restoration plan was completed. Please deny this permit.

Thank you.

Response GP616-1

Draft EIS Chapter 3, Section 3.5, *Animals,* addresses marbled murrelet and forage fish; Chapter 4, Section 4.7, *Impacts on Resources,* addresses potential oil spill impacts on all animals, including birds and forage fish.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP617, **Ruyle, Susan**

Comment GP617-1

There are many concerns about transporting crude oil through Grays Harbor.

Safety to human life and health remain one of my highest concerns. News of the Quebec crude oil train explosion in July 2013 saddened me greatly. I identified with that tragic accident as my office is 25 feet from the railroad tracks. I was thankful we did not run that risk here. I had several of my patientis—retired FEMA workers, engineers, former railroad workers, tell me it was common knowledge these railroad cars carrying crude oil were <u>not</u> built for this purpose and were not safe. Again—I was relieved we did not run that risk here.

As you know, several other explosive accidents have occurred with transport of crude oil in these cars. The government has now recognized the cars are not to standard for transporting crude oil. Plans to replace these cars are “in the works” but these cars are still used and will be for some time. Even with improving the cars, how can they be safe with the cargo they carry?

Other concerns are the safety of the tracks themselves given their age and that much of this area is built on landfill.

Response GP617-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under

existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* discloses voluntary measures and design features, applicant mitigation, and other measures that would further reduce environmental health and safety impacts from rail transport related to the proposed action, in addition to regulatory compliance and best practices. To the extent possible, within the framework outlined in the Master Response for Mitigation Framework, measures addressing the need for more coordinated and focused planning include the role of the applicant as appropriate. However, as noted, no risks can be eliminated and, depending on the circumstances, significant impacts could occur.

Comment GP617-2

In addition, at the Olympic Gateway Mall, there is concern of long trains blocking access to fire trucks and ambulances in the event of an emergency.

The risks of transporting crude oil through Grays Harbor greatly out weighs the benefit.

Response GP617-2

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP618, **Sakai, Eugene**

Comment GP618-1

Once the integrity of a scenic area has been violated it can never be made whole again. Obviously if lives are sacrificed or individuals maimed those facts cannot be altered also. The risk for the financial benefit for a few vs the permanent altered pathway of an area or lives does not seem to equate to me. Eugene K Sakai, DMD

Response GP618-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP619, **Sandwell, Susan**

Comment GP619-1

I have been a practicing RN, and public health nurse, in the western states for over 40 years. I have provided care to patients enduring chronic suffering caused by industrial accidents.

What would my job be like here, as a county health nurse, in Grays Harbor, in 2021??
Possibly something like this.....

"Oh, hello nurse ...I need to talk to you about something. This job at the port, it seemed like the pay was so good ....But now ...I just want to take a deep breath again"..,

I can't even help my grandson learn to ride his bike ....."

"The cops sent you over, didn't they nurse? Well, I know my boys have been causing trouble, breaking into cars, and spray painting that building ... Ever since the ambulance couldn't get to their mom in time, ...

I just can't keep it together at home anymore ....."

"Thank you nurse, for the potatoes and drinking water for the kids. Ever since the boats stopped crabbing, Jose can't find any work ...."

'I know we keep coming into the emergency nurse, but my little Julie gets so wheezy, and starts gasping for air..

I am just so scared she is going to die!!"

"Yes nurse, he's tried this before ....

But you know those horrible burn scars on his legs and face?

Those happened when he was riding his skateboard the day of the Blast. Now he says he'll never go back to school, and ...

He just doesn't want to live".....

For the health and well being of the people of Grays Harbor,

These permits MUST be denied!

Response GP619-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP620, **Sandwell, Susan**

Comment GP620-1

My name is Susan Sandwell. I have been a practicing RN, public health, Western States for over 40 years. I've provided care to patients and during the chronic suffering caused by industrial accidents. What would my job be like here as a county health nurse in Grays Harbor in 2021? Perhaps I may

hear some of this. Hello, nurse. I need to talk to you about something. This job at the port it seemed like the pay was so good, but now I just want to take a deep breath again. I can't even help my grandson ride his bike.

The cops sent you over here, again? I know my boys have been causing trouble breaking into cars and spray painting buildings. Ever since the ambulance couldn't get their mom in time, I just can't keep it together at home any more.

Thank you, nurse, for the potatoes and the drinking water for the kids. Ever since the boat stopped crabbing, Jose can't find any work.

I know we keep coming into the emergency room, nurse, but my little Julie gets so wheezy and gasping for air, I'm just so scared she's going to die.

Yes, nurse, he's tried this before. But you know those horrible burn scars on his legs and face, those happened when he was riding his skateboard the day of the blast. Now he says he will never go back to school and he just doesn't want to live.

For the health and well-being of the people of Grays Harbor, these permits must be denied.

Response GP620-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP621, **Scavezze, Barb**

Comment GP621-1

I'm Barb Scavezze, S-C-A-V-E-Z-Z-E, and I'm from Olympia, Washington, and I'm a grandparent of four small grandchildren including fraternal twins who were born -- they're only five months old, and I shutter to think of what could happen to them if an oil train derailed near their daycare or school.

And I know other grandparents would fear for their grandchildren's lives if their grandchildren lived or went to school in a blast zone. There are just too many schools, homes, and businesses within the blast zone of an oil train derailment and explosion.

Please deny these permits.

Response GP621-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP622, **Scavezze, Barbara**

Comment GP622-1

Name: Barbara Scavezze
Organization:
City/ State/ Zip: Olympia, WA 98501

Please deny these permits I am concerned about long oil trains traveling through WA cities, especially trains traveling near schools, homes & businesses. Several oil trains have derailed already. A derailment in this area could have devastating consequences.

An oil spill in Grays Harbor would be disastrous to the marine life in the harbor, and to the livelihood of those who depend on a healthy harbor.

Response GP622-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP622-2

Grays Harbor sits in a major earthquake tsunami zone. An earthquake or tsunami could topple storage tanks, spilling oil into the harbor & potentially ignite.

Response GP622-2

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

GP623, **Schaeffer, Kathleen**

Comment GP623-1

My name is Kathleen Schaeffer. I live in Montesano, Washington. Good evening. I come to you as an occupational therapist. I have serious concerns about the health and safety impacts of oil by rail transport, tank storage, and export by vessel.

The chemicals in the oil storage tanks released during loading and unloading of trains and tankers will impact Hoquiam and the surrounding towns affecting health, quality of life, and diminishing property values. On-site operations at oil terminals would release toxic pollutants including diesel particulate matter, benzene, formaldehyde, and toluene would risk the society to diesel particulate matter inhalation increasing up to ten fold.

Response GP623-1

As described in Draft EIS Chapter 3, Section 3.2, *Air*, emissions of toxic air pollutants related to routine operations of onsite stationary sources were modeled to be below the state thresholds identified in WAC 173-460-150. The Final EIS section reflects updated estimates based on a review of recently published Bakken crude oil data. These emissions are subject to compliance with an air

permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and applicant mitigation that would reduce potential impacts on air quality.

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant.

Comment GP623-2

The DEIS states the increased rail traffic would almost double emissions of criteria pollutants associated with rail transport in the county. Nitric oxide primarily released by vessel traffic is estimated to be the air pollutant of great concern for both sites.

It's the keystone of smog and it's associated with asthma attacks, respiratory stress, and deaths. Exposure to pollutants associated with these projects has been shown to cause an increased risk of cancers including breast and lung and lower infant birth weight.

How can these risks be mitigated? It is my opinion these health risks are too great and therefore the permits should be denied.

Thank you.

Response GP623-2

As described in Draft EIS Chapter 3, Section 3.2, *Air*, emissions during rail transport would be spread out along the 59-mile PS&P rail line and would be unlikely to result in a localized concentration of emissions that could cause an exceedance of air quality standards.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP624, **Schaeffer, Kathleen**

Comment GP624-1

RECEIVED oct1 2015

As a resident of Montesano I have serious concerns about the health, environmental, social and economic Impacts of oil transit and storage at the Port of Grays Harbor.

The known risks related to oil-by-rail transport, tank storage, and export by vessel pose a grave threat to human health and safety.

The chemical fumes vented from the oil storage tanks, and released during loading and unloading of trains and tankers will Impact Hoquiam, and surrounding towns affecting health and diminishing property values.

Response GP624-1

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources. Draft EIS Chapter 3, Section 3.2, *Air*, presents emissions estimates of criteria and toxic air pollutants from onsite operations. Considering background concentrations, onsite emissions of criteria pollutants would not cause an exceedance of national ambient air quality standards. Emissions of toxic air pollutants related from onsite stationary sources would be below the state thresholds identified in WAC 173-460-150. As described in Draft EIS Section 3.2, these emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources.

Comment GP624-2

Increased ran traffic would heighten pollution including diesel particulate matter, affecting our schools, parks, homes and businesses along the oil transit corridor. Exposure has been shown to result In Increased risks of cancers, stroke and heart attack, asthma, allergies, chronic obstructive pulmonary disease, and neurodevelopmental and behavioral disorders in children.

Response GP624-2

Draft EIS Chapter 3, Section 3.2, *Air*, presents an analysis of cancer risk from emissions of diesel particulate matter from rail transport related to the proposed action. Final EIS Section 3.2 has been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analysis predicts lower emissions; the level of increased risk is not considered significant.

Comment GP624-3

There is also the real potential for explosions and oil spills from train derailments which would Impact community safety, and water and food security.

Our communities would assume the risk of oil transit and storage, while oil companies would reap the profits.

There is no way to mitigate the risks and dangers of oil transit and these crude oil terminals, and therefore the permits should be denied.

Kathleen Schaeffer Montesano, WA 98563 October 1.2015

Response GP624-3

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions,

such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP625, **Schaeffer, Kathy**

Comment GP625-1

Hauling frequent trainload s of extremely volatile crude oil through our communities in tank cars on antiquated poorly maintained rail lines , storing it near schools, homes, businesses, in a Tsunami Zone on sites subject to liquefaction, shipping it through extremely valued,highly productive,highly sensitive marine resource environment, in fast moving sediment laden water, and then over the "second worst bar on the west coast" is a recipe for disaster.

The impacts on the Grays Harbor economy and the economies up and down the Pacific Coast, and the health and safety of the citizens would be enormous.

The multi-million commercial and Native crab, oyster and fishing and tourism industry would be devastated, with long-term loss of jobs and worker displacement.

As the DEIS states repeatedly "potential environmental damage would be significant...these risks would remain even with implementation of mitigation." The Washington Department of Fish and Wildlife has stated: "Grays Harbor is an area particularly sensitive to the adverse effects of oil spills. If there were to be a spill the volume of product considered would likely lead to a catastrophic loss of Habitat. And the potentially affected area could be much larger than just Grays Harbor vicinity." As the three West Coast Governor's jointly stated last summer: "...a sizeable spill anywhere along our shared coast would have a devastating impact on our population, recreation, natural resources, and our ocean and coastal dependent economies." Doug Zimmer, retired from USFW, stated on October 1, 2015 at Elma DEIS Hearing: 3.5-21 "The DEIS characterizes the effects of contaminants reaching a surface water body as short-term and temporary. The bottom and sides of the Grays Harbor estuary are soft soils – essentially mud – and the tidally-influenced rivers that feed the Harbor back flush for tens of miles in each tide cycle. The effects of toxic release in such areas are not short-term, nor are they temporary: rather they are chronic and persistent. Please review the effects of similar 6 releases into coastal estuaries during the Deepwater Horizon event for examples. Any toxics spilled into Grays Harbor water bodies are likely to be detectable and toxic for decades."

Response GP625-1

Section 4.7, *Impacts on Resources*, describes the general types of impacts on resources that would be expected as a result of an oil spill; the section has been revised to acknowledge the potential for more lasting impacts as the result of a spill.

Comment GP625-2

The Westway and Imperium projects should be denied as there is no possible mitigation for the cumulative, complex, deleterious and dangerous impacts associated with these projects. This DEIS must not enable the Westway and Imperium projects to go forward. These permits must be denied.

Response GP625-2

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP625-3

These proposed terminals are located in a tsunami and liquefaction zone with a 65% chance of a 6.0 or greater earth quake . A Cascadia Subsidence would drop the landform and surrounding area by 2 meters or roughly 6-1/2 feet and would instantly place approximately 113,000,000 gallons of crude oil at or below sea level. This was not adequately addressed in the DEIS.

Response GP625-3

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Final EIS Chapter 3, Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* acknowledges that while the proposed facility may not be operational following the occurrence of a large seismic event, the storage tanks would contain materials until such time as they can be safely recovered and/or the facility returns to operational status.

Comment GP625-4

The environment, effects, and transport of released crude oil, dispersed oil, and dispersants on human health and the environment should have been carefully documented and studied. Explosions, spills, and fires, can have multiple environmental and public health impacts, which should have been quantified and analyzed for their economic impacts. Chronic effects on bottom-dwelling marine communities, mammals, birds, and humans were not analyzed and discussed in DEIS.

Response GP625-4

Draft EIS Chapter 4, Section 4.2.2.2, *Northwest Area Contingency Plan*, describes the planning framework in place for Washington State and discusses the factors considered when planning and implementing a response effort. The Regional Response Team is responsible for the Northwest Area Contingency Plan development that includes the consideration of dispersants or *in situ* burning.

The approach to the risk analysis is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Section 4.7 also acknowledges resources that could be adversely affected by an oil spill, fire, or explosion in the study area, including impacts on environmental and public health impacts. This section has also been revised to more fully describe the potential impacts on human health.

Final EIS Chapter 4 reflects additional mitigation measures proposed to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP625-5

Humans can also be affected by occupational exposure to oil and other chemicals while participating in response and cleanup operations, or by environmental exposure including exposure to air pollution from the vented terminals, during loading and unloading of oil and during tank car transport, as well as ingesting oil-contaminated seafood.

Response GP625-5

Draft EIS Section 4.7, *Impacts on Resources*, has been revised to more fully describe the potential human health impacts that could occur as the result of an oil spill, fire, or explosion.

Comment GP625-6

A detailed study of the conditions of the bed, ties, rails, crossings and bridges must be undertaken and quantified. Rail line conditions from Centralia to Hoquiam are completely inadequate to handle oil trains, and as shown by the recent derailments of grain trains.

Response GP625-6

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

GP626, **Schaeffer, Kathy**

Comment GP626-1

My name is Kathy Schaeffer, and I'm a resident of Montesano, Washington. As a resident of Montesano, I have serious concerns about the health, environmental, social, and economic impacts of oil transit and storage at the Port of Grays Harbor.

The known risks related to oil by rail transport, tank storage, and export by vessel pose a grave threat to human health and safety.

The chemical fumes vented from the oil storage tanks and released during loading and unloading of trains and tankers will impact Hoquiam and surrounding towns, affecting our health and diminishing property values.

Response GP626-1

Refer to Response to Comment GP624-1.

Comment GP626-2

Increased rail traffic would heighten pollution, including diesel particulate matter, affecting our schools, our parks, homes, and businesses along the oil transit corridor. Exposure has been shown to result in increased risks of cancers, stroke, and heart attack, asthma, allergies, chronic obstructive pulmonary disease, and neuro-developmental and behavioral disorders in children, including autism.

Response GP626-2

Refer to Response to Comment GP624-2.

Comment GP626-3

There is also the real potential for explosion and oil spills from train derailments which would impact community safety and water and food security.

Our communities would assume the risk of oil transit and storage while oil companies would reap the profits. There is no way to mitigate the risks and dangers of oil transit and these crude oil terminals, and therefore the permits should be denied. Thank you.

Response GP626-3

Refer to Response to Comment GP624-3.

GP627, **Schmid, Alice Marie**

Comment GP627-1

My comments relate to both the Westway and Imperium Draft EISs.

I believe the Grays Harbor area should NOT be a terminal to ship oil or ANY fossil fuels. The Columbia River would be susceptible to muck contamination if there should be a spill due to accidents. Moreover the U.S. should NOT be encouraging burning of fossil fuels because it is causing destruction of our planet.

Response GP627-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP628, **Scholzen, R.**

Comment GP628-1

We all know from the past crude oil rail disasters how dangerous crude by rail has been. ND crude is highly dangerous because of it's explosive properties. Rail lines through the Hoquiam and Aberdeen areas pass through commercial and residential areas, not to mention the areas they pass through just to arrive in these areas. There are few remedies that are possible to prevent rail disasters even though attention has been paid to updating rail beds and other safety concerns. It is not a matter of if but definitely when such a thing will happen. A crude raid accident in the towns of Aberdeen and or Hoquiam could in fact literately destroy one of these cities. The concerns for new jobs in these areas are understandable but the cost is far too great if such a disaster should take place. And of course if these facilities should be approved and crude by rail does take place we then have to look at the possible disasters that could take place if a spill should enter the waters of Grays Harbor. We can take a small look at the BP Deep Water disaster in the Gulf only to see what price we all might pay if such a disaster should take place in Grays Harbor. Have you eaten any Gulf Shrimp lately? And as a resident close to the Pacific, I have noted oil at our shores from the Alaskan Veldese spill 10 years after that disaster.

Response GP628-1

Comment acknowledged.

GP629, **Schramm, Richard**

Comment GP629-1

I have lived my entire life in Portland, Oregon and my Mother was raised in the Hood River Valley. I grew up in a family that had a passionate love of hiking and photographing wildflowers in the Columbia Gorge National Scenic Area. During my lifetime (i.e. 64 years), I have seen the quality of our hiking and recreational experiences degraded by ever-increasing railroad traffic in the Gorge. Thus I oppose the increase in the number of trains that this proposal represents, as well as the threat of oil spills that could present a threat to life and the environment.Thank you for considering my thoughts on this important matter.

The risks of this project are not worth it merely to export more fossil fuels that will only add to global warming.

Response GP629-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP630, **Schultz, Chuck**

Comment GP630-1

I recently rode a bus from Hoquium to Olympia, which stopped for railroad tracks several times. I spent time on behalf of railroad traffic that no one paid me for. I understand that this was a safety precaution because a train crashing a bus would be disastrous. How many accidents with buses and trains occur in spite of the precaution? It may be less than one in a thousand crossings. If the percentage stays the same and the train trips increase, there will be more disasters. More trains will also mean more traffic tie ups. This will be more traveler's time for which the traveler is not reimbursed. This cost should be figured in the EIS.

Response GP630-1

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, describes potential changes in vehicle safety at grade crossings along the PS&P rail line under the proposed action. Draft EIS Chapter 7, Section 7.3, *Cost-Benefit Analysis*, describes the range of costs that could occur related to the proposed action, including costs associated with vehicle delay. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action .

GP631, **Schultz, Nancy**

Comment GP631-1

Good evening. My name is Nancy Schultz. I live in Vancouver in the blast zone. I'm vigorously opposed to any oil by rail to the terminals, because of the safety concerns you heard about, also because of the very real adverse environmental dangers.

There have been five derailments so far in 2015. I'm going to talk about four of them. We have photos. On February 16th of this year at Mt. Carbon, West Virginia, an oil train carrying Bakken crude to North Virginia derailed and exploded sending 26 cars into the Kanawha River, the main source of drinking water for the citizens in Mt. Carbon.

1. On February 6 of this year, at Mt. Carbon, West Virginia, an oil train carrying Bakken crude from North Dakota to Virginia, derailed and exploded and sent 26 cars of oil into the Kanawa River, the main source of drinking water for citizens, and burning a nearby house to the ground. Hundreds were evacuated. The fire had to be allowed to burn itself out.
2. On March 5 of this year at Galena, Illinois, 103 cars on an oil train carrying crude from the Bakken fields derailed, again with firefights having to allow the fire to burn itself out. An unknown amount of crude spilled into the Mississippi.

3. On March 7, at Gogama, Ontario, Canada, 10 cars of a 40 car length of train went off their tracks, exploding. Some of the crude entered the Mattagami River, a source of water for citizens and Indians who lives there.
4. On May 6, in Heimdal, North Dakota 300,000 gallons of crude oil burned in a huge explosion resulting in the evacuation of the entire town of Heimdal. This crude oil had been treated to reduce volatility, had two sand-filled bugger cars on each end, as was traveling at only 24 miles per hour when it derailed.

It's not hyperbole to call these trains "rolling bombs". That's what they were. The impact on the environment of smoke and fumes on our waterways cannot be mitigated. Do not let the greed of oil overcome your common sense. Deny these permits.

Thank you.

[Photos reviewed but not reproduced.]

Response GP631-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP632, **Schumacker, Joe**

Comment GP632-1

My name is Joe Schumacker. I'm a resident of Ocean City, Washington. I'm a marine biologist by trade. I've had the pleasure, first of all, to wade through these DEISs. The slider bar illustrations that basically show something like you would set an equalizer, at home, on your stereo showing risk to people's public safety, threats to environment is totally misleading. It's a way of making things look innocuous that are not.

Below those you can see the tables with the illustration of the slider bar, this event can happen in this many years, is likely to happen in this many years scenario. Some of these are just outrageous. And one of these, I heard this testimony earlier about this, was the full failure of one of the big storage tanks. I think it says it happened -- or is likely to happen in 30 to 40,000 years. What the heck does that mean? That's meaningless.

Response GP632-1

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment GP632-2

And when you have the testimony that you've heard earlier about the seismic situation in this area and the landfill in this area, the possibility of a subduction zone earthquake on our coast, you write that off in an analysis and say that will be covered in the building permits that will be used to build the tanks issued by the cities.

Please, please, this is something serious. Everybody here is threatened by it. Deny these permits.

Response GP632-2

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction. Final EIS Chapter 3, Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* clarifies the potential for significant and unavoidable impacts.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP633, **Schwartz, Susan**

Comment GP633-1

Name: Susan Lee Schwartz
Organization:
City/ State/ Zip: Longview, WA 98632

The oil is the wrong way for Aberdeen. The oil trains will travel through Longview. There is no way to make them safe.

They (the trains) will hold up traffic. Will someone dye [sic] because he/she cannot get to the hospital because a oil train is stopping the EMS.

Response GP633-1

As noted in Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, because the frequency of train traffic on the PS&P rail line would increase, the probability of an increase in emergency response time at these crossings would also increase. This impact would only occur if an emergency vehicle experienced a delay related to a train going to or from the project site that would operate on average 1.25 times per day. Vehicle delay would be most substantial in Centralia and Aberdeen. However, for the majority of the PS&P rail line grade crossings, the increase in crossing blockage time would not result in a substantial increase in vehicle delay compared to the no-action alternative because the potential to encounter a train at any crossing for the average vehicle would be low. Nonetheless, because vehicle delay would increase, emergency vehicle delay would also increase at grade crossings.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP634, **Schwarzenback, Marian**

Comment GP634-1

Name: Marian Schwarzenbach
Organization Name (if applicable): St. Patrick's Catholic Church
City/State/Zip: Seattle, WA 98102

My comments relate to both the Westway and Imperium Draft EISs.

The Grays Harbor area is a major natural area that is a major stopover for bird migrations to and from N. America, Canada & Alaska, as well as marine mammals (whales, seals, etc.), but also fish migrating and, especially, entering and leaving major rivers for spawning. These are major fisheries, providing food and also income for a large portion of the population in S.W. Washington. Native American fisheries would be heavily endangered,--possibly ruined. The sea bed of the Bay is soft squishy mud, suitable for bivalves, etc.—it would be impossible to clean an oil spill. This is a terrible location to even consider for any exposure to filthy, poisonous products like oil or coal.

Trains carrying coal or oil are a polluting, dangerous and unpleasant source of likely spills, derailments, accidents, fires & explosions, air and soil pollution in a relatively pristine area.

Huge tankers (I can't imagine how much Dredging would have to be done in that extremely shallow muddy bay to allow the tanker traffic anticipated) dealing with strong tides & shifting sea bottoms would likely meet with disaster not unlike the New Orleans mess.

I just today saw a map of oil accidents this year in the U.S. and was astounded at the huge quantity of them—all over the country, but focused, of course, in Texas & Louisiana.

Health effects on humans in drifting chemicals & particulates endanger populations living in nearby areas and those traversed by trains.

Plankton living in waters and mud of the Bay might be the most negatively impacted—having a deadly effect on fish, birds and whales, other cetacians [sic] who depend on them for their major food sources.

It's just a terrible ideas all the way around.

Sincerely, Marian Schwarzenbach

4542 Stanford Ave N.E.

Seattle, WA 98105

Response GP634-1

The proposed action would not require dredging or deepening of the navigation channel to accommodate proposed vessel traffic.

Draft EIS Chapter 3, Section 3.2, *Air*, presents an analysis of potential impacts on air related to construction and routine operation of the proposed action.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to onsite operation and offsite rail and vessel transport under the proposed action.

GP635, **Schwickerath, Dean**

Comment GP635-1

November 30, 2015

Dear Governor Jay Inslee and the Co – Lead Agencies; City of Hoquiam Administrator Brian Shay and Department of Ecology Director Maia Bellon ,

My wife and I strongly oppose any crude oil projects in Grays Harbor because they pose extreme risks of damage to the environment, will decrease hard earned tourism that our community has worked to add and will seriously harm jobs in our communities while providing little benefit to the citizens of the state. For these reasons the permits should be denied.

We believe that the DEIS and the process by which it is presently under review is significantly flawed. These deficiencies as commented on in detail by others require that the permits be denied.

One of the critical problems in these proposals is the location. Grays Harbor is a shallow harbor by nature in a rural community. A rural community that resists to its core spending money to protect shorelines, the harbor or rivers and the environment unless forced to by outside influences such as our state and federal government. Grays Harbor will never approve a tax levy to help protect or respond to environmental disaster including oil spills. Why would DOE approve locating projects in a community that won't help fund any project that might harm their communities, jobs, tourism, and the environment.

DOE must consider for any project approval the cumulative impacts of multiple individual projects when these individual projects are known. To not do this is for DOE to conduct business with blinders on and our community isn't a race track.

It is unacceptable for DOE to ever sit back and watch an environmental disaster to be "cleaned" by allowing it to burn out. Technology and entrepreneurs have created very powerful fire fighting systems. We saw one on Youtube that had jet engines pumping thousands of gallows of water a minute to put out oil well fires and these solutions can work for burning tank cars. Here is the link for that video. It is impressive. https://www.youtube.com/watch?v=GOlq6RRh3sg

Response GP635-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action. For a discussion of projects considered in the EIS and the approach to the analysis of cumulative impacts, refer to the Master Response for Connected and Similar Actions and Cumulative Impacts Analysis.

Comment GP635-2

We believe and DOE knows that major oil spills can not be prevented, cleaned up or properly mitigated. DOE might believe that small oil spills in the right places will be properly addressed but life never hands us everything we want. Even a small spill in a bad location will be nightmare to address and when the big one occurs; 1, 5 or 10 years down the road, it will be Grays Harbor that suffers because DOE lacked the backbone in 2015/2016 to do the right thing for our state.

Response GP635-2

The small spill scenarios addressed in Draft EIS Appendix M, *Risk Assessment Technical Report*, and Appendix N, *Oil Spill Modeling*; and summarized in Draft EIS Chapter 4, *Environmental Health and Safety,* include any volume up to the specified amount. As noted in Chapter 4, existing regulations and proposed mitigation cannot completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP635-3

This proposal puts the Grays Harbor National Wildlife Refuge at risk of not only killing the birds, marine mammals, crab larvae and salmon as a result of a large spill, but contaminating the Harbor and coastal shorelines for generations to come. A spill at the height of shorebird migration could decimate the Western Sandpiper as approximately 80% of this species population uses Grays Harbor as a critical stopover during their migration for feeding and rest.

The DEIS states in several places that mitigation is not possible. If mitigation is not possible, these projects should be denied. The risks far outweigh any short-term benefits.

The November 27, 2015 issue of The Olympian newspaper included an article on page 3A, titled "**Analysis: Derailment every other year if terminal built**". The article states the analysis was performed by a state agency but does say which one. The analysis was in regard to the proposed Port of Vancouver project to build the largest oil train terminal in the Pacific Northwest. This analysis states that an empty oil train would derail every 20 months along the proposed routes. Additionally, it state that a loaded oil train would derail every 2 years and that there would be an oil spill every 12 years. It seems that it would not be out of the question to apply those statistics to these projects. The report also includes information about the lack of preparedness by fire departments along the route. Again, similarities are likely to exist with the Grays Harbor projects. DOE should review this report.

Some projects just aren't worth the risks as we recently have seen with the Tar Sands pipeline project. After many years of review, it was finally denied. Please deny the permits for these projects.

Sincerely
Dean Schwickerath Diane Schwickerath
231 N Sand Creek Rd
McCleary WA 98557

Response GP635-3

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

GP636, **Seaman, Carol**

Comment GP636-1

Grays harbor and the Chehalis River Surge plain is a highly sensitive area. This estuary is home to a 5,000 acre Washington State Natural Area Preserve (NAP) and includes numerous species, (some/many) identified already in danger from water, land and air pollutants & disruptions. Much work has been done here to renew habitat and otherwise protect the growth and preserve the area for future generations of these fish, birds & animals.

As For this environmental impact statement, Imperium, Westway--it is fundamentally wrong and overwhelmingly incorrect to state that a 450% increase in vessel traffic, with barges carrying millions of gallons of crude oil across the 2nd most dangerous bar on the West Coast-will have no impact. It will! You are unable to mitigate human error, as well as location-earthquake, tsunami

zones. The Port of Grays Harbor demonstrates big problems with extremes in winds, high tides, high rains which do combine for an impending disaster for all of us who work and live here.

It is very frustrating that DOE & Brian Shay of Hoquiam will listen to and abide by an outside source so obviously favoring the sell out of our port to Oil! While you do not read the facts gathered by all who have homes, jobs and lives in an economy where 31% relies on our marine resources. It is apparent that you have misrepresented the facts regarding the grave impact of 2.7 billion gallons of crude oil being exported--if you are trying to tell us this oil will have no impact..check your figures on tides and disaster-your plan for clean up amounts only to throwing money at SER. Or first responders...this does not mitigate disaster. Do you understand that? Apply some logic and reasoning to your document and you must say no to this plan for crude oil. All is at risk--and for 50 jobs? Get serious -show some honesty. We are not stupid-you are selling us out to the very evils of oil! Carbon emissions and immeasurable risk to our waters & marine resources. Rethink your motives-this is not in the best interests of any one of the citizens-period! After looking at this DEIS document and accompanying propaganda--It is quite clear which side you are on. It is not in the best interests of the people and environment & economy of Grays harbor. You must say no to this crude oil. It promises to seriously and clearly be the demise of our port and contributes significantly worldwide to climate disaster!

Response GP636-1

Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, presents an analysis of channel and berth capacity under the no-action alternative and proposed action. Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP637, **Seaman, Carol**

Comment GP637-1

From: Carol Seaman Oil and water do not mix! Nor do People, Birds Fish and Pollutants mix! As a citizen, among many, with a home in the blast zone and vulnerable to all effects & unmitigated disasters associated with a cumulative proposed 2.7 billion gallons of oil planned for shipping by

barge and tankers from Grays Harbor--I am adamantly opposed to this permitting. It must be denied. In this document I find uncountable reasons for denying the permitting of these 2 oil storage & shipping companies, Westway and Imperium, at the Port of Grays Harbor! Over time & after more than 22,000 public comments on this topic, it becomes increasingly redundant and difficult to reiterate why we should not bring these proposed volumes of crude by rail through our communities, across our waters and along our important rivers to store 72 million gallons (the equivalent of 2,526 oil tank cars) in a major earthquake and tsunami zone-in the city of Hoquiam--as if this will bring life and jobs and improve our existence. It will not. In fact--that is not the case at all! We are poised on the brink of disaster in all respects and all is at risk. With this elephantine document in front of us, which cannot relegate clean-up, not mitigate spills, we can and we continue our argument on the specifics of the unmitigated risks proposed for our communities, our health and our marine resources--our Port and coastal waters. Address these risks? Admittedly, at this point in time, I am losing hope that there is much regard for critical thinking, or attention to public concern. Here goes, again:

HEALTH- Relevent testimony has been given by Washington Physicians for Social Responsibility on the status of citizen health in this county. Grays Harbor lands at the bottom of the scale. We are described as the sickest and most highly vulnerable to health risks--not properly acknowledged, or mitigated in this DEIS. Our first health concerns are spurred by carcinogenic fumes, not only from oil storage tanks (fumes which will invade our homes, our space--our senses, our bodies) but also fumes & pollutants from copious unmeasured amounts of diesel burned by increased incoming oil train traffic, as well as the 450% increase in vessel traffic diesel fumes. Fumes which cannot be mitigated and will sicken & putrify the community and all communities along the route from The Bakken Shale. The contribution to carbon emissions & global warming aspects made by this lethal combination is unacceptable, not properly reviewed in this document. The list of schools, parks, hospitals and senior centers within 1 mile of the proposed project site and a quarter mile from the rail road tracks (DEIS at 3.2-5 to 3.2-8) is disturbing. The DEIS also finds impacts from noise impossible to mitigate. Bakken oil from North Dakota and tar sands from Alberta are both extremely hazardous in different ways. The final EIS needs to fully review their unique health risks, spill clean-up issues, global warming aspects and explosive nature. Fully review and release these facts to citizens and communities.

Response GP637-1

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources. Draft EIS Chapter 3, Section 3.2, *Air*, presents emissions estimates of criteria and toxic air pollutants from onsite operations. Considering background concentrations, onsite emissions of criteria pollutants would not cause an exceedance of national ambient air quality standards. Emissions of toxic air pollutants related from onsite stationary sources would be below the state thresholds identified in WAC 173-460-150. As described in Draft EIS Section 3.2, these emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources.

Section 3.2, *Air*, presents an analysis of cancer risk from emissions of diesel particulate matter related to the proposed action, including emissions from offsite rail transport. Final EIS Section 3.2 has been updated to reflect revised assumptions regarding rail operations (types and number of

locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant.

As presented in Draft EIS Section 3.7, *Noise*, increased rail traffic related to the proposed action would result in increased average daily in noise along the PS&P rail line that could result in impacts considered severe on sensitive receptors under FRA/FTA criteria near eight grade crossing as a result of train horn noise required for public safety. Section 3.7 proposes a mitigation measure for the applicant to fund and support a process for the affected communities to work with the FRA to apply for a quiet zone to limit train horn sounding. Quiet zones would eliminate impacts at crossings where implemented. Where not implemented, train horns would continue to sound for safety and the potential for exposure to severe impacts at identified grade crossings would remain.

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Comment GP637-2

JOBS- Grays Harbor falls at the bottom of the educational scale-having the fewest college graduates in this state. We are the most uneducated-highly unemployed. Many people of Grays Harbor are in need of jobs. However, there has been no transparency on job claims. The minimal numbers of jobs offered are far from off setting the risks of this project, especially in Grays Harbor. In truth the numbers of jobs offered for these projects are not confirmed and have been varied and overstated, ranging from 8 to 75. In this DEIS the numbers presented by these projects--45 jobs! For 45? jobs--all of the people in Grays Harbor and Hoquiam are put at maximum risk. The economics of this do not make sense. Westway: P672(7-32) Cost Benefit Analysis (to Hoquiam) Onsite-3-4 workers in Hoquiam (from a total of total estimate of 15) Imperium: P688 (7-32) Cost Benefit Analysis (to Hoquiam)Onsite-4-5 workers in Hoquiam (from a total estimate of 20). Economic Impacts-According to a 2013 study by the University of Washington regarding jobs--a major oil spill could devastate marine resource jobs which support more than 30% of Grays Harbor's workforce, A study by the Quinault Indians found that a major oil spill could put more than 150 tribal commercial fishermen out of a job, resulting in a direct loss of as much as $20 million in wages and up to $70 million in revenue for affected businesses. The cost gain does not override the risks posed to the people of Grays Harbor. This DEIS fails to adequately analyze the harms and negative impacts of these terminals, not only if there is an accident, which there will most certainly be, but impacts on other proposed developments, the marine resources, economy, tourism, property... For The City of Hoquiam, The Department of Ecology, and Public Companies such as Westway and Imperium to pay millions for this study, taking more than a year to do such and then allow the public to make comment for 2 minutes--smacks of the absurd. Yet, you--named above--sit in the seat of power, making the rules of engagement, while the people of Grays Harbor, and across this state, rally the troops and grapple with this wordy, weak, unreasonable and flawed document--finding it ridiculous

and daunting for a muriad of reasons. Therefore, those who are unable, or unwilling to read this, must rely on those of who can; to make sense of nonsense and to forge an educated and reasonable argument-hoping it will be read and considered. Grays Harbor and all of her communities who have passed resolutions to stop crude by rail have raised their voices in fear of pending disaster. This most recent, elephantine, and almost insulting DEIS of some 3600+ pages is a document unreadable for many who strongly oppose, question & note the direct threats, to them, of transporting and storing 72 million gallons in an earthquake zone, a tsunami zone and adjacent to one of the most important migratory shorebird feeding grounds in the world. Again, and again. The powers that be--you, in the subject line of this message--need to mitigate this disasterous plan. The only way possible is to deny these permits. Read, Ruminate and Relegate this to the "NO PERMITTING FILE." This is a complete sell out of the health, lives, economy, environment and waters of Grays Harbor. We can do better than this! Thank you. Carol Seaman Grays Harbor Citizen Chehalis River

Response GP637-2

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2, has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP638, **Seaman, Carol**

Comment GP638-1

My name is Carol Seaman. I'm a Grays Harbor citizen. I live on the Chehalis River, 50 feet from the railroad tracks and 125 feet from the river in the blast zone. And I do have some serious concerns about this study.

I didn't write this down but my first and most serious concern about your study, in which I know that you hired a company to do the study, but I think it fails, really seriously fails to consider a great deal of other information and testimony that was given by the Washington Council of Firefighters, by the Washington State Physicians for Social Responsibility, by the friends of Grays Harbor, by the Citizens for the Clean Harbor, by the Washington Crab Fishers Association, by the Commercial Fishes of Grays Harbor County and the west coast of Washington.

And I really think before this draft is finalized, that you need to go back and look at that. Also information that came out from Siteline Institute. That really, really pinpoints the extreme dangers of this movement that is happening right now with crude oil in Washington state.

Response GP638-1

The co-leads reviewed and considered all scoping comments. Final EIS Appendix A, *Scoping Comments*, provides a catalog of all written comments received during the formal scoping period.

Comment GP638-2

So with that being said, I'd like to just read you some of my concerns, and I'll stop when my two minutes are up.

This DEIS fails to address previous and quite specific public commenting. Now we again bring more serious concerns from citizens of Grays Harbor and all of Washington and all along the entire rail line, the blast zone, east to the Bakken Shale of North Dakota, where fracking and drilling and poisoning begin. These two crude oil terminals proposed, along with the U.S. Development terminal, will ultimately result in 2.7 billion gallons of crude per year for storage and export from the Port of Grays Harbor.

The impasse of this cannot be mitigated. You need to consider and include facts and figures on the total burning of these proposed yearly exports, equaling 2.7 billion gallons of crude oil.

Response GP638-2

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively. The Final EIS has been updated to include estimated emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

GP639, **Seaman, Carol**

Comment GP639-1

My name is Carol Seaman, I spoke earlier. I turned in my comments, but I just wanted to revise the subject of mitigation, and especially as it pertains to the health and welfare of the people in Grays Harbor County, particularly those along the railroad tracks.

And when the Washington State Physicians for Social Responsibility gave their report, it was some stunning information. And I don't know if you've had a chance to look at it, but it does note that Grays Harbor is the 39th county of health. That means in Grays Harbor we have the worst health. We also have the fewest college graduates, and we also have almost the highest rate of unemployment.

And I don't know how you have mitigated that in this document, the fact that you are putting people at risk. Actually, it is kind of like we're being -- the people of Grays Harbor are being thrown under the bus -- or the train if you will -- because you have not considered the effects of the extra diesel burning.

I mean, you say it's within state guidelines or within normal limits, but you also haven't given us an idea of the carbon emissions that would result from a total -- a total burning of the 202.7 billion gallons of oil that will be going out of our harbor every year.

When that is burned somewhere else to go back on us, is that within the carbon emission levels that are required by our clean energy governor and the carbon emissions law that they're trying to pass? I mean, how much carbon are we going to burn without saying this is going to change everything, and not just for Grays Harbor.

Response GP639-1

Draft EIS Chapter 3, Section 3.2.5.2, *Proposed Action,* and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been revised to include emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Mitigation Framework for a description of how mitigation is identified in the Draft EIS.

GP640, **Seaman, Carol**

Comment GP640-1

Hello again. My name is Carol Seaman. I'm a third generation Grays Harborite, and I live in a blast zone on the Chehalis River. I've said it before and I'll say it again.

I've labored over this public commenting since, this time because the plan to store 720 million gallons of crude oil in a tsunami, earthquake zone, high winds, high tides, high rains. You cannot mitigate disaster under those conditions.

Response GP640-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP640-2

Then I read that the vessel traffic increase with Panamax and barges. One Panamax tanker three football fields long coming up that narrow shipping channel 300-some more times than it did before all of this started. And I'll tell you it's pretty frightening -- very, very frightening. I wrote my master's thesis -- I'm a former educator and I wrote it on integrating higher level thinking skills in a content area.

If this was a content area and I were grading your DEIS, I would have to give you an F. The bottom is factual, the top is analysis. You're supposed to take an event all the way to the top and analyze and predict what is going to happen.

You have not predicted carefully what is going to happen here with this volume of oil on our sensitive harbor. Nor have you predicted what this is going to do to the marine resources here. Very, very improperly studied and predicted.

And I'm afraid for all of us and I hope you will consider all that's been said today and change your mind, because they're not based on critical thinking.

Response GP640-2

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Final EIS Sections 4.4.3, 4.5.3, and 4.6.3 have also been revised to include additional mitigation measures to address risk related to spills, fires, and explosions. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

GP641, **Seaman, Carol**

Comment GP641-1

Inspite of the charts you have developed to assure us that allwill be safe in air quality, noise, water environment, safety, health etc. It just ain't so. You have failed to apply information given to you by Wash. Crab fishers Assoc., Wash. Physicians for Social Responsibility WCFF, Friends of Grays Harbor, The Quinault Nation and many others.

You have rubber stamped the efforts made by many studies to tell you this is fundamentally WRONG. 2.7 billion gal. of crude oil, 110 oil trains a month through our communities, over 100 streams Will have an impact. Disaster cannot be mitigated. Go back to the drawing board and consider the evidence given by someone other than your consulting firm. You should be ashamed for putting all at risk here in Grays Harbor.

Response GP641-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP642, **Segretti, Fiona**

Comment GP642-1

Protect Our waters in Washington. Over use of harbors is hazardous to marine life. Reinforce development of renewable energy sources and the need to keep air and water clean. New jobs can be created. Don't allow potential toxic waste and excessive traffic to spill in Our waters.

Response GP642-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP643, **Seiler, David**

Comment GP643-1

David Seiler. I live in Southwest Thurston County with Kay, but we're also property owners in Grays Harbor County as well.

I'm just going to finish her statement for her.

Given the vast quantities of severely ignitable and toxic product transported and stored, and the recent tragic accidents, insurance coverage will be woefully inadequate. Instead, taxpayers will bear the costs of responding to and attempting to clean up major tank farm and rail disasters. Environmental degradation cannot be mitigated.

If these projects are implemented, future generations will wonder why the people of this time traded sustainable fisheries and a healthy tourism economy for a crude oil portal. Thank you.

Response GP643-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP644, **Seiler, David**

Comment GP644-1

My name is David Seiler. My wife and I live in Chehalis. We also own property in Grays Harbor. We are admittedly opposed to these expansion tank farms. It's time we leave the oil fields. They represent far too great a risk of all residents along the tracks.

These tracks split communities from -- all the way from Dakota to here, one after another. And the risks are unmitigatable. I'm a retired salmon research scientist of 30 years, but I'm not naive enough

to think that the concern for the environment and aquatic resources in places such as Grays Harbor will stop these trains. It should.

It's a risk to humans and everything else as well. But I think that the thing is, the risks are worse than the DEIS estimates. I believe the proponents of these projects underestimated how much of oil will be transported to their facilities by rail. And therefore the risks are higher than estimated. They've represented the best case scenario and once if they were to get these permits, then they would move oil even at faster rate.

Imagine a new president congress approving the export of crude from this nation along with economic upturn the price of crude oil, those two factors combined make this even more unacceptable. Please deny this permit.

Response GP644-1

As noted in the Master Response for Project Objectives and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant. Draft EIS Chapter 2, *Proposed Action and Alternatives*, describes the type of material and approximate volumes to be transported based on this information. The City of Hoquiam will specify maximum throughput in the conditions of a shoreline development permit. In addition, other permit approvals could identify the maximum allowable (permitted) throughput of the facility. Any increase in annual throughput capacity would require revised or new permits or plans.

GP645, **Seiler, Katherine and David**

Comment GP645-1

October 16, 2005
RECEIVED
OCT 17 2015

Dear Governor Jay Inslee and the Co- Lead Agencies; City of Hoquiam Administrator Brian Shay and Department of Ecology Director Maia Bellon,

We strongly oppose the expansion of crude oil projects in Grays Harbor because they pose extreme risks of un-mitigatable loss to human life and the environment while providing little benefit to the citizens of the state. For these reasons the permits should be denied.

We believe that the DEIS and the process by which it is presently under review is significantly flawed. These deficiencies, detailed below, require that the permits be denied.

First, the arbitrary and capricious limit of two minutes per person to provide oral comments is inadequate. There are several purposes of oral testimony, to establish the record and to allow others to hear the testimony thereby enabling subsequent discussion. These elements are considered essential to a full public process. In this case, the two minutes allowed for public testimony is insufficient to complete a cogent thought, much less the complex issues that should be aired, to address the number of key issues in this proposal, and allow all present, not just the co-leads to hear other citizen thoughts. Two minutes limits the public disclosure of concerns and opportunity for discourse. Shame on the co leads for imposing a two minute limit on each person commenting on

thousands of pages of complex issues. Clearly, this violates the public testimony requirements of SEPA.

Second, sixty days is inadequate time for the public to read, analyze and comment on over 3000 pages, fraught with inconsistencies, and errors. Consequently, many errors may slip through.

Response GP645-1

Pursuant WAC 197-11-455, the lead agency for a SEPA proceeding shall provide 30 days for review of and comment on a Draft EIS. This may be extended by 15 days upon request. The co-lead agencies issued an extended 60-day comment period that was then extended to 90 days based on public requests to provide additional time for review and comment.

The time limit for public testimony in the main room was established to allow the greatest number of people to speak given the large turnout. Numerous other opportunities to comment were also available, including the opportunities to provide oral testimony to court reporters in semi-private areas at the open house and to provide written comments in various formats.

Comment GP645-2

Third, Impacts and risks are a function of the volume of crude oil transported over the rails. The entire DEIS risks and impacts are based on a thru put volume of crude oil provided by the proponents. It is critical to understand, however, that there are no restraints on the volume of thru put once this project is approved. When, oil prices rise and or the ban on exporting USA crude is lifted and or due to other market forces the proponents find that it is in their interest to increase the volume pushed thru, the thru put for these trains, tanks and ships will increase. Over and over in past SEPA documents, we have seen one volume proposed, only to increase when economic incentives prevail. All impacts projected in the DEIS are based upon the proposed volume and therefore, to the extent that this is underestimated so-are the actual impacts.

Similarly, but in the opposite direction;-the benefits of this proposal- i.e. the number of resultant jobs are likely overstated. The result is that the DEIS under estimates the negative impacts and risks while overestimating the benefits. Therefore this DEIS must be denied as the projected impacts are underestimated.

Response GP645-2

As noted in the Master Response for Project Objectives and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant. Draft EIS Chapter 2, *Proposed Action and Alternatives*, describes the type of material and approximate volumes to be transported based on this information. The City of Hoquiam will specify maximum throughput in the conditions of a shoreline development permit. In addition, other permit approvals could identify the maximum allowable (permitted) throughput of the facility. Any increase in annual throughput capacity would require revised or new permits or plans.

Comment GP645-3

The fourth reason, is the extraordinary amount of errors and inadequacies contained within the DEIS. A few examples:

1) The DEIS has tried to explain mitigation for burning train cars. However, it acknowledges that the sole method to deal with tank train fires is to stand back and let them burn.

Response GP645-3

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Final EIS Section 4.3, *Risk Considerations,* also reflects additional information about factors influencing cleanup. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP645-4

2) The DEIS states that marine mammals do not enter within 3 miles of the harbor routinely to feed. This statement which is absolutely false, indicates that the authors know nothing about the harbor's ecosystem.

Response GP645-4

Draft Chapter 3, Section 3.5, *Animals,* acknowledges frequent marine mammal use of Grays Harbor. Final EIS Section 3.5 clarifies whale use of Grays Harbor, including frequent use by the gray whale, and provides additional information on gray whales, humpback whales, and killer whales.

Comment GP645-5

3) That the maximum speed of water in the Harbor would be one knot and achieved only once per day. The monumental ignorance exposed by this statement causes one to question is this just an egregious error or a deliberate attempt to mislead. After all it is common knowledge that cleaning up oil in moving water is impossible.

Response GP645-5

Specific reference to the error is not provided. Draft EIS Section 4.3, *Risk Considerations*, indicates water flows within the harbor average between 1.9 and 2.8 knots but can reach 5 knots.

Comment GP645-6

Fifth, all three crude oil projects should be considered holistically before a decision to permit any one project. The risks to public safety and to the environment, the actual economic costs and reduction in the day to day quality of life elements, such as delays of transportation, noise, vibration, air pollution, must be based on the impacts from all projects combined. Expansion of these storage facilities would not be considered without construction of the Port of Grays Harbor terminal. All of the risks and impacts from transporting crude oil to and from these storage facilities by rail and

ship, respectively have to be identified and assessed by this DEIS. SEPA requires related projects to be considered as a whole.

Response GP645-6

Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of the incremental addition of impacts from the proposed action to impacts from past, present, and reasonably foreseeable future actions—including the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project. Refer to the Master Response for Connected or Similar Actions for more information on the consideration of connected actions. Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively.

Comment GP645-7

The addition of storage of this quantity of hazardous oils requires additional terminal capacity. Therefore, this DEIS must examine the primary project risks; delivering crude oil to the harbor via rail and exporting the same by ship. A derailment or major spill would be a catastrophe, most likely including a major fire, and oils that are impossible to clean up once spilled into the Chehalis River or Grays Harbor. This DEIS does not provide for adequate prevention, response, cleanup or mitigation. The reasons for this are basic: it is not possible. If any such measures were possible they would be so costly that these projects would not even be considered. For example the response to fires resulting from oil train derailments to date has been to stand back and wait for them to burn out.

The DEIS states in several places that mitigation is not possible. Which brings us to a key point- if mitigation is not possible, then why are we considering permitting this proposal? There are extremely high risks and little benefit. This proposal puts the Bowerman Basin, a National Wildlife Refuge and national treasure at risk of not only killing the birds, marine mammals crab larvae and salmon as a result of a large spill, but contaminating the Harbor and coastal shorelines for perpetuity. It puts thousands of children in the blast zone, not only in Aberdeen and Hoquiam, but all along the route, at risk of incineration. It is true, there is no mitigation for such risks. Therefore these projects must be denied.

This is the one chance to get this decision right. There are a few permits to be issued and the building of tanks that caused the SEPA to be engaged. This SEPA opportunity is the only time that the full rail impacts will be assessed. Even if the trains derail with the attendant horrors, and the corporations fall to bankruptcy as has been described in many scenarios, that won't stop the continuation of this rail traffic. Another company could take over operations of the storage facilities since the construction has already been permitted. This is the one chance to secure our future by saying no to the dangerous and deadly rail traffic upon which this project depends.

The Grays Harbor watershed which drains over 2,500 square miles is the largest system accessible to anadromous fish in Washington State outside the Columbia Basin. The harbor is a national treasure that provides habitat essential to important fish and wildlife populations that support the local and state economy. These oil storage projects will cause irreparable harm to these resources and the dependent economies. If these projects are permitted, future generations will wonder why we traded sustainable fisheries and a tourism economy based on a healthy environment for a crude oil portal.

Appended to this letter are additional comments that should be considered in the EIS process.

Sincerely Katherine B Seiler, David E. Seiler

Cc: Sally Toteff, Washington Department of Ecology
The Surfrider Foundation The Friends of Grays Harbor Earth Justice
Citizens for a Clean Harbor

Response GP645-7

Draft EIS Chapter 4, Section 4.2.1, *What framework prevents incidents from happening?* describes the formalized planning framework in place to address risks related to oil spills, fires, or explosions from the terminal operations, rail transport, or vessel transport. The responsible party may vary during the transport of crude oil. This section describes the requirements for planning and preventive equipment and design. Section 4.2.2, *What framework prepares for an incident?* describes federal and state regulations to prepare for an incident, the integration of plans, and drill and exercise requirements.

Final EIS Section 4.2.3, *What framework provides responses to an incident?* has also been updated to better reflect existing response capabilities and resources in the study area, including information identifying existing gaps from the Marine and Rail Oil Transport Study (Ecology 2015). Final EIS Section 4.7, *Impacts on Resources,* has been updated to better reflect how the proposed action could affect emergency service responses.

Final EIS Chapter 4 reflects additional mitigation measures proposed to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

Chapter 4, *Environmental Health and Safety*, identifies other proposed measures to ensure that broader prevention, preparedness, and response planning involves the appropriate stakeholders and that updates to any plans applicable to reducing risks related to the proposed action contain appropriate applicant information and participation. To the extent possible, as outlined in the Master Response for Mitigation Framework, measures that address the need for more coordinated and focused planning clarify the role of the applicant as appropriate.

Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7 describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

For more information about the analysis of potential impacts in the extended study area, refer to the Master Response for the Geographic Scope of the EIS. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP645-8

Additional comments:

The likelihood of an earthquake or tsunami has not been adequately addressed. The DEIS states that the tanks and their appurtenances -valves, piping etc... in both tank farms are not required to be

resistant to a major earthquake or the impacts of a tsunami that could affect the structures and also overtop the containment. Since we have seen recent examples of both earthquakes and tsunami's on coastal waters, and the likely spills and either explosions or fires that could result, it is reasonable to require that the tanks be able to with stand the likely projected earthquakes and tsunamis. Also all tanks should be fitted with valves that immediately close should shear action occur.

Barring a tsunami, perhaps the greatest risk the storage facilities face is liquefaction. On October 14th, 2015, PBS ran an hour long special, 'The Oregon Field Guide Show', that presented geologists and seismologists discussing the preparedness of structures in Oregon to withstand a large seismic event. They demonstrated how during an earthquake, liquefaction will cause tank destruction and massive spills from the'tanks that were placed on fill. The DEIS reports show that the project sites match the Oregon tank situation. The mitigation for such liquefaction potential must be to engineer these tank farms to prevent such liquefaction during a serious earthquake on the order of 9.0.

Response GP645-8

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment GP645-9

In 35 years of being regulated and regulating hazardous substances, I, K Seiler, have never seen a pollution prevention system that didn't fail. Insufficient consideration of how to deal with the likely cataclysmic scenarios has occurred. Events will happen. In the case of Hazardous Waste Facilities, the companies have to provide funding in trusts or bonds, to pay for sudden and non-sudden events that could impact the community or environment, and requires posting insurance for the fullest extent of possible occurrences. These facilities are not required to do so, but actually have vastly more volume of severely ignitable and toxic materials than those permitted Hazardous Waste Facilities. These proponents are LLCs which limits their liability; once the relatively small amount of insurance these facilities are required to obtain ($25 Million) has been used to deal with an incident, the remaining costs to deal with a larger incident will be passed on to the state and local government.

Additionally, the insurance money is never available immediately. The local government or state will need to jump into the breach to pay for any costs that these companies don't immediately pay for. The costs to address immediate issues could bankrupt either Aberdeen or Hoquiam, which has deeper pockets than the small towns that routinely are in the blast zone of a derailment or fire. Washington State already has budget woes, and increasingly doesn't have resources to fund emergencies such as this.

In the case of the Lac-Megantic rail disaster in Quebec, Canada, estimates of cleanup exceed the $400 Milllon claim, which the province of Quebec has filed for, and there are over $450 Million in claims from the families of and the impacted people. It is likely that these estimates understate the actual costs to the area, it's environs and it's peoples. And this is just what happened for part of a train that derailed. Should a major event happen at the storage facilities or terminal or in the harbor the costs

will be much higher. Thus for either of these projects to go forward, they each should be required to establish a fund of at least $1 Billion that would be immediately accessible for work to respond to an emergency, mitigate the impacts to the extent possible and recover from such an event.

Transportation hazards of Bitumen oil are different than normal crude oil. Cleanup of that oil will be more hazardous to complete and at times not possible. Note the following about one cleanup of Bitumen oil- which they call Dilbit.

From Congressional Research Services Report from September 2014 US Rail Transportation of Crude Oil: 'Dilbit may pose different hazards and possibly different risks than other forms of crude oil. On July 26, 2010 a pipeline owned by Enbridge Inc. released approximately 850,000 gallons of dilbit into Talmadge Creek a waterway that flows into the Kalamazoo River in Michigan. [45] Three years after the spill, response activities continued, [45] because, according to EPA, the oil sands crude [47] "will not appreciably biodegrade." The dilbit sank to the river bottom, where it mixed with sediment, and EPA has ordered Enbridge to dredge the river to remove the oiled sediment. [48] As a result of this order Enbridge estimated in September 2013 its response costs would be approximately $1.2 billion, [49] which is substantially higher than the average cost of cleaning up a similar amount of conventional oil. [50]

Cleanup in Grays Harbor is likely to be much more difficult than that of a creek, and therefore either much more costly or just not possible. This is another reason to deny the permits, or to require the $1 Billion in bond money for the day that it will be needed.

Response GP645-9

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP645-10

As already stated the numbers that are outlined for train delays for traffic are likely to be best case scenarios. Delays of traffic have a cost. Nowhere in the DEIS do we see an evaluation of the cost of delays to businesses and the public. Here is a real example of the costs of train delay - especially when the likelyhood of multiple train delays at one time are considered for the three projects: A friend of ours has a small business teaching piano from her home near Satsop. Her house will be cut off from access multiple times a day for train delays. It is likely that her customers will drop her as a teacher when they have to factor in the extra 20 or more minutes for train delays. One more small business winking out and things like this will be played out over the route. I have already heard several people say if this comes to pass that they will not use services on the train route. The true costs oftrain delay need to be incorporated into the DEIS.

Since the train traffic delays are likely to cause cost to many of the communities, and potential health concerns or deaths in emergencies, incorporating overpasses for train crossings for commuter and business traffic should be considered as appropriate mitigation. The mitigation actions that are proposed over and over are the very least that can be done and of little or no cost to the. proponents. It appears that the consultant was told to make sure that the mitigation doesn't cost the proponents. The DEIS has to be revised to include mitigation even if the costs are significant to the proponents.

Response GP645-10

Grade separation was not deemed reasonable as mitigation for impacts related to the proposed action, as described in Section 3.16, *Vehicle Traffic*. The Final EIS section has been revised for clarity. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*. Refer to the Master Response for Mitigation Framework for an explanation of how mitigation measures were identified.

Comment GP645-11

Burlington Northern Santa Fe (BNSF) and PS&P are not included in the proposals as a partner, yet much of the risks occur In transit on their rails. These corporations are responsible for scheduling trains and maintaining cars and tracks. As a result they are a huge partner inthe impacts. The BNSF portion of the rail route isn't even analyzed in the DEISs (Imperium Project Chapter 3). We have been told that the traffic impacts can't be truly stated because it isn't known what the scheduling ofthe trainswill be, since the railroads won't release this information. Therefore this DEIS is flawed, because it doesn't recognize major partners that need to be included.

Response GP645-11

The Draft EIS addresses the indirect impacts of rail transport related to the proposed action in the study area in Chapter 3, *Affected Environment, Impacts, and Mitigation*, and Chapter 4, *Environmental Health and Safety.* Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP645-12

The DEISs state in the water sections that it is not likely that the toxics spilled at the project sites would get to Grays Harbor. This is due to the requirements of the permits and the training of staff required. We wish this was true, but if this was the case then the Department of Ecology would not routinely be responding to spills from businesses permitted through the NPDES system, which it does. This cavalier attitude plays very loose with facts. The DEIS should be revised. If such a statement is left in the DEIS it must be supported. This could be done by comparing spill reports in our state with the permit system. Since that was not done this false statement should be removed and a true analysis of the likelihood of spills reaching the environment outside containment and outside the project be completed.

Response GP645-12

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses the impacts associated with routine operations, including the potential for minor spills and leaks. As noted in Section 3.3, *Water*, the potential for impacts associated with such spills would most likely be minimized by containment features and best management practices. The potential for widespread environmental damage related to the risk of oil spills, fires, and explosions is addressed in Chapter 4, *Environmental Health and Safety.*

Comment GP645-13

The Imperium DEIS goes on to state that the Groundwater generally is impaired due to lube- oil-range petroleum projects. There is no citiation for where this information comes from, nor does it state from what operations that occurred to cause this contamination and when. This should be fixed if known and if not known it should state so.

Response GP645-13

This comment is specific to the REG (formerly Imperium Terminal Services) Expansion Project and would be addressed in responses to comments as part of the Final EIS for that proposed project.

Comment GP645-14

Highly flammable materials will be stored at these projects. Due to their nature, all permits must require in the footprint of each project that only non-sparking equipment be used.

Due to the composition of the crude that would be transported, the material once spilled would be considered Hazardous Waste, due its characteristics of both ignitability and toxic components. That would mean that any of the materials spilled that could not be recycled immediately back into product would be considered hazardous -waste and must be treated as such.

The environment and the public in addition, to explosion and burning hazards, would be exposed to cancer causing substances. And since many of the materials that would be spilled, could not be completely cleaned up, they would pose an exposure for many years. As a result the costs of exposure and of disposal of the Cleaned up materials would be much higher than other commodities that could be spilled, such as wheat. These costs are nowhere addressed in the DEIS and should be incorporated into the funding referenced above. This funding must be made immediately available

through bonds or other mechanisms. These funds must also be made available for cleanup of spills across all cities, counties and towns that this proposal has an impact on.

The proposal will cause the loss of property values throughout the rail route and especially within 1/2 mile of the railroad in the established blast zone. The increase in noise, delay of traffic, the increased risk of spill and potential for disaster will cause the properties within the 1/2 mile radius of the blast zone to be most severely affected, but others further out will be impacted as well, as people choose where to do business. Those costs have not been considered in this DEIS. Compensation for those within the blast zone for loss of real estate value should be fully mitigated. In the event of a major conflagration property values will decline far from the blast zone.

Response GP645-14

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Draft EIS Chapter 7, Section 7.3.4, *What are the costs of the proposed action?* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP645-15

The delays of the oil trains will cause loss of life at the individual level in day-to- day operation of these projects, even if other disasters don't happen. In our circle of friends and neighbors, we have two families who will be cut off behind the rail transit who have family members that need medical services when they need them-on an emergency basis. Those families, when they purchased their homes believed they had timely emergency assistance, not knowing these projects would change their response times. This will be a significant change and impact to the conditions of their property. As stated in the DEIS at 3.15.27 the delays are estimates and based on the limited trains proposed. They do not consider the full range. Of the impact when thru put is increased. And, as also stated in 3:16.3.2, there is the potential for loss of life due to delay. This again is another reason for denying these permits.

Response GP645-15

Refer to Response to Comment GP645-2 regarding throughput estimate evaluated in the EIS.

Final *EIS* Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed

action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Final EIS Chapter 3, Section 3.16.8, *Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?* clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).

Comment GP645-16

The rail grade has sections that cannot reliably provide safe passage of these heavy and lengthy crude trains. As an example there was a train accident and large wheat spill in Central Park recently. Had that incident involved volatile crude oil it would have been a disaster. We have appended an article from the LA Times below which points out several problems with rail traffic that will be at issue for these proposals. The 2014 Pennsylvania train derailment happened on newly laid rails, less thana year old. Railroad experts hypothesize that the failure of the rails which caused the incident is likely because of several factors including the length of and thus the weight of the trains. Also mentioned in this same article is the impact of heavy rain on track stability used by heavy long crude trains. Since this is a likely reason for derailment, appropriate mitigation must be required including;

1) reducing the train length significantly, and
2) reconstructing the rail beds so they are on solid substrate, not on compressible fill.

Far from adding jobs to the Pacific Northwest these storage facilities will damage our existing economy. The rail system and road system will be stressed to the limits, adversely affecting quality of life and economic viability. As stated above the full impacts of the train impacts on traffic; and based on these issues, impacts to our businesses that need access to timely rail service, have not been evaluated by this DEIS. For those reasons alone, these projects should not be granted. Note these statements which are excerpted from Sightline's 72nd article about Crude Oil transport, October 8, 2015:

Newcomers to our rail system, these oil trains play no part in moving the cargo that makes the Northwest economy tick. Far from boosting commerce, oil trains threaten to derail it. Consider the case of Cold Train, a Quincy, Washington company that, until recently, shipped refrigerated fruits and vegetables. The company went bust after its goods were crowded off the rails by coal and oil trains (http://www.truckinginfo.com/blog/trailer-talk/story/2015/04/founders-of-failed-cold-train-blame-bnsf-railway-sue-for-41-million.aspx). The owners of the now-defunct company are suing BNSF, but it's already too late for the workers who lost their jobs.

"New projects could induce as many as 100 loaded crude oil trains per Week to transit Washington."

Terry Whiteside, who represents the Wheat and Barley Commissions for many western states, says that "the huge increase in Bakken oil movements and doubling of coal movements have contributed to the worst service meltdown in two decades affecting all commodity movements in the northern tier." A Cargill executive said much the same thing to the Seattle nmes in a 2014 story headlined, clearly enough, "Oil trains crowd out grain shipments to NW ports."

Response GP645-16

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Draft EIS Chapter 3, Section 3.15.4.7, *Current PS&P Rail Line Capacity and Operations*, presents the results of the rail modeling analysis of the PS&P rail line capacity. Based on this analysis, the addition of 1.25 trains per day on average to baseline trips would result in approximately 4.25 train trips per day along the rail line, which is approximately one-third of the capacity of the line. For more information about the analysis of potential impacts on the BNSF main line, refer to the Master Response for the Geographic Scope of the EIS.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP646, **Seiler, Kathy**

Comment GP646-1

Hello. I'm Kathy Seiler. I live in Olympia, Washington. I border on the Chehalis River and Grays Harbor County. I live in Thurston County.

We are opposed to both of these projects because they provide little benefit to Washington state while incurring extreme risk to public safety, the environment, and quality of life.

It is disingenuous to consider the impacts of the oil storage projects separately. All three, including the Grays Harbor Terminal and Storage, should be considered as a whole. And because these projects depend on transporting crude oil by rail and ship, impacts during transport to and from these storage and terminal projects must also be assessed for the total capacity. SEPA requires related projects to be considered as a whole.

Response GP646-1

Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of the incremental addition of impacts from the proposed action to impacts from past, present, and reasonably foreseeable future actions—including the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project.

Comment GP646-2

A derailment or major spill will be catastrophic. It would likely include a major fire, and oils that are impossible to clean up once spilled into the Chehalis River and Grays Harbor. No where in these DEISs is adequate prevention or response described; nor could it be. The response to such derailment, spills and resulting fires to date has been to let them burn themselves out, as it is impossible to contain them.

Response GP646-2

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP646-3

Nor has the likelihood of an earthquake or tsunami been adequately addressed. Anyone who dismisses this potential should review the videos of the tsunami that wiped out the Fukushima nuclear plant in 2011.

Response GP646-3

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment GP646-4

In my professional 35 years of working with hazardous substances, I have seen every type of pollution control system fail. These DIES's provide insufficient consideration of cataclysmic scenarios. Events will happen. In the case of hazardous waste facilities, the companies have to provide funding in trusts or bonds to fully pay for sudden and non-sudden events that impact the community or environment. Insurance is also required to mitigate for the fullest extent of the damage. These projects should be required to meet those standards.

These projects provide inadequate disaster response or mitigation funding. These companies are limited liability corporations.

Response GP646-4

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP647, **Serres, Dan**

Comment GP647-1

Please see the attached documents from the Tesoro-Savage Draft EIS to be included in the record for the Westway and Imperium DEISs.

Response GP647-1

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP648, **Serres, Dan**

Comment GP648-1

Please see the attached documents from the Tesoro-Savage DEIS to be included in the record for the Westway and Imperium DEISs.

Response GP648-1

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP649, **Serres, Dan**

Comment GP649-1

Please see the attached documents - Section 3 of the Tesoro-Savage DEIS - for inclusion in the record for the Westway

Response GP649-1

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP650, **Shafer, Sarah**

Comment GP650-1

I would ask that you quantify the risk of an accident for the entire route from North Dakota to Centralia. I also ask that you please report accurate information as the Draft EIS for the oil terminals

in Grays Harbor was horrible. Instead of saying that 14 of the last 16 derailment spills caught fire and 10 exploded, they said most oil train spills don't catch fire.

Response GP650-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

As stated in Draft EIS Section 4.5 *Environmental Health Risks – Rail Transport*, long-term historical data show that most rail-related oil spills do not result in fires or explosions and a fire or explosion would be less likely to occur than an oil spill. Additional information regarding the risks of fire explosions during rail transportation is provided in Draft EIS Appendix M, *Risk Assessment Technical Report*.

GP651, **Shaleen**

Comment GP651-1

My name is Shaleen. I'm a member of the Confederated Tribes of Warm Springs, Oregon. And I travel 150 miles to get here today because I'm really concerned about the safety of the people who are fishing -- tribal fishers on the Columbia River.

And our people have a treaty, guaranteed right to fish on the Columbia River and also to live -- inhabit the Columbia River from around Bonneville Dam up to John Day. And there's around a 150 mile stretch of train that goes along the Columbia River there.

And it's kind of hard to explain but our camping sites are sandwiched between the train tracks and the river there. And I've always felt the threat of the trains there. And when we camp, we're literally like ten to 100 yards from a train track. And there's dozens of these sites on both sides of the river all the way up and down.

And it's just the trains are something you can't get around. In fact, one of the treaty emblem sites also has a sign at the railroad that says Indian crossing. And it's just -- it's actually harder to explain than in real life. It actually literally feels threatening.

And I'm worried about the people like if there's a train wreck then people—families, kids, and the old people—won't be able to escape. There's, you know, not really a safety plan. And I just think this is—in the bigger picture this is really a threat to our way of life if a disaster happens to our ecosystem.

Thank you.

Response GP651-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the

extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP652, **Shapiro, Alice**

Comment GP652-1

Name: Alice Shapiro
Organization: Sierra Club
City/ State/ Zip: Portland, OR 98212

I believe the impacts to the entire length of this project need to be considered the impacts regarding health, climate change, train derailments and other non-mitigatable consequences are not limited to the local area around Gray's Harbor. The entire Columbia Gorge (& world) are at risk.

Response GP652-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action

GP653, **Shapiro, Howard**

Comment GP653-1

The detrimental effect to the citizens and environment of the entire Pacific Northwest must be considered in considering this permit. The DEIS in error by limiting findings to this immediate area. The Aberdeen area does not exist in a sealed vacuum: it is an integral part of the Pacific Northwest and the rest of the world! Deny the permit!

Name: Howard Shapiro
Organization: Sierra Club
City/State/Zip: Portland, OR 98212

The DEIS states that there are several unmitigatable sections to this application. This is enough to deny the permits for this application. It should be obvious that the increase in dangerous rail traffic carrying a potentially lethal cargo (fracked crude) and the resulting impacts of holding up traffic, including emergency vehicles, is not worth the inflated estimate of income to local government. Most of this income will possibly be expended on attempted cleanup if an accident occurs.

Response GP653-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP654, **Shapiro, Howard**

Comment GP654-1

Thank you. My name is Howard Shapiro. I live currently in Portland, Oregon, where I've served on the County Planning Commission. And I do understand your position. I would like to say that it is occasionally okay to smile.

The EIS indicates that there are several unmitigatable sections to this application. This is enough alone to deny the permits. It should be obvious that the increase in dangerous rail traffic carrying potentially lethal cargo and resulting impacts of holding up traffic, including emergency vehicles is not worth the inflated estimated income to local governments.

Most of this income will possibly be expended on attempt to clean up if an accident occurs. The detrimental effect to the citizens and environment of the entire Pacific Northwest must be considered in considering this permit.

Response GP654-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP654-2

The DEIS is in error in limiting findings to just the immediate area. The Aberdeen area does not exist in a sealed vacuum. It is an integral part of the Pacific Northwest and the rest of the world. Please deny this permit. I don't want to be down in Portland and read about something that happened up here and say I told you so.

Thank you.

Response GP654-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP655, **Sharpe, Elaine**

Comment GP655-1

No to oil refineries in Washington. Oil refineries alter landscapes, could possibly pollute river ecosystems, increase greenhouse gases, and decrease the quality of air and of life.. Train tanker cars are not built to safely transport crude oil and the length of trains is a hazard to communities and emergency agencies. We can do better than allow potential pollution to our beautiful Pacific a northwest.

Response GP655-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action. The proposed action does not include construction of an oil refinery. Refer to Draft EIS Chapter 2, *Proposed Action and Alternatives*, for a description of the proposed facility and operations.

GP656, **Sheats, Melanie**

Comment GP656-1

Hi, my name is Melanie Sheats. I'm from Olympia, Washington. And I came here today to listen. I didn't have a predrafted speech. But what I hear today from the speakers that are pro permits is -- what stuck in my mind was simply the economy -- stimulating the economy.

But my question is: How is the local economy impacted with one mistake? One natural disaster? Look at South Carolina, and they just had a thousand year flood, completely unanticipated. But I never thought I would hear in my lifetime the term thousand year flood.

And what we can learn from other people is the reasons why those risks, what might be lost, what is the risk; the high risk of possible catastrophic fire, spills, and air pollution.

We need to protect our wildlife, birds, flora, humans. We can have earthquakes, tsunamis, and soil liquefaction risks that make health impacts. We'd have unimaginable cost of cleanup with the burden put onto the taxpayers. There's a job exaggeration versus job loss should there be some type of disaster, The impact of climate change, corporate profits benefitting just a few, noise pollution, sacrifice of the region.

I mean, I've heard 100 reasons why you should deny this. And I've only heard one that makes sense, stimulate the economy. But, again, I ask the question, with one mistake, one national disaster, what is lost? And I think that's the question that needs to be answered.

Response GP656-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP657, **Shelman, Dave**

Comment GP657-1

There is a common link between all the proposed coal and oil expansion facilities. Almost all the fossil fuels scheduled to come to these facilities will travel via the Columbia River Gorge. The review of each facility, including each EIS, will be incomplete if it does not evaluate the impacts that will be felt in Gorge communities, tourist sites, and, most critically, to the Columbia River National Scenic Area. The increased barge and rail traffic alone will harm these resources---even if no accidents ever occur. Over time they will happen. The Gorge is a valuable and fragile environment that cannot withstand the damage likely to occur if this traffic is allowed. Include study of the impacts along the routes of the fuels being delivered to these facilities.

Response GP657-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area.

GP658, **Sherdahl, Eric**

Comment GP658-1

The risks and adverse environmental,economic and social potential devastation from the proposed projects cannot be fully mitigated and therefore the permits should be denied. Please reconsider and say no to these unacceptable oil trains and oil terminals. The reality of earthquakes, mudslides and floods are enough of a reason, to stop this project from moving forward.

As a homeowner in Hoquiam,you have not adequately mitigated for property values dropping, health and safety in our communities threatened and all the potential for destruction to our economies and way of life. Please deny these permits, for the sake of all people all along the tracks.

Response GP658-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP659, **Sherdahl, Judy**

Comment GP659-1

Hello, my name is Judy Sherdahl, and I live in Hoquiam. The current findings in the DEIS proposed oil terminals show that the risk to our community's safety and potential adverse environmental and economic damage cannot be fully mitigated.

The possibility of such unmitigated devastation is not acceptable. We need to say no to these oil terminal projects and yes to protecting our community, our children, and our future. There is disturbing safety record of train derailment in Grays Harbor County.

This last year, 2014, four separate derailments occurred. The Grays Harbor derailment on April 30 crossing at S. Washington Street in Aberdeen derailed and spilled its contents traveling at only five miles per hour.

The railroad investigations determined this, and I quote, Failing railroad ties that were soaked by recent heavy rains caused the derailment in Aberdeen. So I ask you this. How is it possible to mitigate for rainfall and future train car derailment?

Consider the recent storm on January 6, 2015, in Hoquiam where 5.4 inches rain fell in 24 hours causing flooding and mud slides. These torrential rains overwhelmed both Abrdeen and Hoquiam in the very areas you propose these train terminals will be situated.

Also take into account that these sites are located at earthquake, liquefaction, and tsunami zone. How do you mitigate loss of life? How do you mitigate potential destruction to entire communities? Not to mention concern about the risks of water pollution, increase of toxins that will impact a citizen's health from these proposed projects.

So, in your DEIS describe how oil trains, oil terminals will negatively affect the health, safety, and welfare of all communities.

Response GP659-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on human health.

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

GP660, **Sherman, Rhonda**

Comment GP660-1

Studies show that coal exports endanger the health and safety of all who live in the transportation corridor. The problem with coal dust is compounded by problems associated with dangerous diesel pollution emitted as these super-heavy trains push and pull toxic loads from Wyoming and Montana to Oregon, Washington, and British Columbia. PLEASE DO NOT ALLOW THIS!!! I DO NOT SUPPORT THIS!!!

Response GP660-1

The proposed action would not involve the transport or handling of coal. Refer to Draft EIS Chapter 2, *Proposed Action and Alternatives*, for a description of the proposed facility and operations.

GP661, **Sherman, Russell**

Comment GP661-1

No Coal is clean energy, Its all a big lie, Give back our land and our water our mineral rights, they belong to the people, not to big corporations.... Coal is killing our planet and no you can escape.

Response GP661-1

The proposed action would not involve the transport or handling of coal. Refer to Draft EIS Chapter 2, *Proposed Action and Alternatives*, for a description of the proposed facility and operations.

GP662, **Sherman-Peterson, Ronald**

Comment GP662-1

Please deny the permits to proceed with these oil-related projects in the Grays Harbor area. Please be sure to include all impacts in any and all impact statement studies, including impacts on the amount of carbon in the atmosphere that will result from the burning of the oil shipped through terminals. Below are a few of the many facts to be taken into account, Proposed oil shipping terminals and the dirty, dangerous oil trains, storage tanks, tankers and barges that would come with them puts the health and safety of people, the local economy, and our ocean and coastlines at risk. There is no way to mitigate the risks and dangers of these crude oil terminals. Grays Harbor communities would take on the risk, oil companies would reap the profits, and Grays Harbor would become a throughway for oil going elsewhere to places like California and even overseas. Wrong place for oil terminals: Much of what makes Grays Harbor special would be at risk. The narrow, shallow shipping channel and strong currents put Grays Harbor at high risk of an oil spill. A single major spill could devastate the area's maritime economy, productive fisheries, tribal treaty rights and spectacular coastal waters. Dirty and dangerous oil trains: The alarming safety record of oil trains means an explosive oil train derailment may be a question of when, not if.

Response GP662-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Section 4.6.3, *What mitigation measures would reduce impacts related to vessel transport?* to reduce the likelihood of a spill reaching the environment and the potential impacts if an incident were to occur in Grays Harbor. As noted in, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. For more information about the data, assumptions and methods used in the risk analysis,

refer to the Master Response for Risk Assessment Methods and the Master Response for Environmental Health and Safety Analysis.

Comment GP662-2

Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line from Hoquiam to Centralia and all the way to the oil source in North Dakota and Alberta, Canada. Better way to meet our energy needs: Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming. Building more, big infrastructure for yesterday's energy is the wrong path to meet today's energy needs.

Response GP662-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*, which presents a detailed analysis of potential impacts on air quality in the study area related to the proposed action.

GP663, **Shillinger, Barb**

Comment GP663-1

What I want to say is that the future of Grays Harbor depends on protecting our environment, protecting the fish, the oysters, the birds, all of those things, our scenic, our beaches.

If we have oil here, they -- for one thing, they don't tell the truth about the number of jobs that are being created. A lot of times they count -- well, all of the time they count the jobs that it will take to make the facility but not -- that will not be permanent jobs when they leave.

And we've seen that even if there are jobs, they don't go to the local people. They go to people who come from somewhere else. So I think the storage of oil in the harbor is an insane idea.

It's right across from the bird sanctuary, and someone said that the birds can go somewhere else, but they can't. This is an important stomping ground for them and their flight to and from Alaska, and they can't stop anywhere else. This is where they stop.

And so I think that it's just a bad idea. It doesn't provide jobs any more than the soybean trains provide jobs.

It takes one person to unload a whole train of soybeans, and it will be the same with the oil. It will all be automated. It won't provide a lot of jobs, only the construction side of it would.

And I'd rather see them build visitor centers and schools and parks and other things and put people to work that way rather than have them build facilities to store oil on Grays Harbor.

My name is Barb Shillinger, S-H-I-L-L-I-N-G-E-R, from Aberdeen.

Response GP663-1

Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits, including job creation. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP664, **Shillinger, Lamont**

Comment GP664-1

No small number of jobs is worth risking our environment for.

I'm Lamont Shillinger.

Response GP664-1

Comment acknowledged.

GP665, **Shober, Harlan**

Comment GP665-1

October 26, 2015 Harlan Shober 2280 SE 34th Ave. Portland, OR 97214 To: US Army Corps of Engineers Regulatory Branch Post Office Box 2946 Portland, OR 97208-2946 Telephone (503) 808-4385 Attn: Melody White, Project Manager WA Department of Ecology SEA Program Post Office Box 47600 Olympia, WA 98504-7600 Telephone (360) 407-6068 Attn: SEA Program, Federal Permit Coordinator Reference: NWP-2014-177/2 (Kalama Manufacturing and Marine Export Facility) and NWP2015-111 (Kalama Lateral Project) To all concerned: I urge you to reject these and any other proposals to develop transportation or storage facilities for fossil fuels. Such decisions are all too often made by bureaucrats whose scope of understanding is artificially limited to the arcane details of codes and regulations. Rarely have they walked the land they've been set up to condemn. To the extent that any of you are whole persons, consider this: We know, beyond any reasonable doubt, that the first adverse effects of climate change are already upon us. We know that humans are causing nearly-impossible-to-reverse damage to the very thin and fragile skin of this blue-green sphere. There is no other place for us to go. In boardrooms from Washington, D.C., to New York and from Ottawa to Edmonton corporate leaders pour over spreadsheets and maneuver for immense profits at the expense of frontline communities. You owe a duty, as whole persons, to use the broadest possible perspective to protect those communities. You can't escape the responsibility of knowing what you know. Don't pimp out your neighbors and fellow citizens. Regards, Harlan Shober

Response GP665-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP666, **Shubert, Stephen**

Comment GP666-1

The DEISs include all the vessel traffic from these proposed projects in Grays Harbor entering the Salish Sea. This could be for bunkering (vessel fueling) purposes and/or to deliver crude oil to the refineries. If these projects are permitted, 638 additional crude oil tanker and tank barge transits would be passing through the Salish Sea each year. More vessel traffic means more risk of a major oil spill, therefore, we ask that the FEISs thoroughly address all of the projects' potentially adverse impacts to San Juan County's water environment, economy, and all of its species (human and otherwise).

San Juan County's tourism economy is inseparably linked to a healthy and sustainable salmon fishery and Orca population — where there is salmon, there are Orcas. "Our" Southern Resident Killer Whales (SRKW) have been tracked by NOAA to the mouth of Grays Harbor where the salmon rivers of the Humptulips, Satsop, and Wynoochee empty (see tracking map below). For not only the SRKW and salmon, we ask that the FEISs address all potential adverse impacts to all the 119 species-at-risk in the Salish Sea, their migratory pathways and their critical habitats. We ask the FEISs to include a cumulative impacts analysis of all existing, new, and "reasonably foreseeable" (proposed) vessel traffic in the Salish Sea.

Response GP666-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from vessel transport—less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP667, **Simone, Dorthea**

Comment GP667-1

Oct 8, 2015 Aberdeen, WA
For Grays Harbor Hearing DEIS documents..
.Health Questions:
Greetings safety experts.

Three year ago, now, The American Nurses Association passed this resolution to ban all Fracking of Oil . Please, read these copies of the nurses' Resolution..

...We insist you stop harming families, especially, in rail road towns, here. I will not review the devastating effects on Health that you have heard over and over.....but I have a few questions:

Re: Diesel Fumes:

Were they able to test for worsened air quality after the 1,100 gallon diesel spills into the Columbia River, last Friday? We can expect more diesel to pull more trains, right? Diesel evaporates and those train fumes....contain formadehyde....., arsenic..... and benzene, right?

...So, whereas, the Crude or Coal Transporters or OilFrackers will not help,

...Will each city need to construct special buildings with air filters, during dangerously high emissions, from many more trains?..Will they give out air filter masks? With ,newer, emissions control plans, will the trains pollute in a way that spreads out pollution over several days? Will trains stop running when pollution becomes too deadly? With new standards, In Louisiana and Texas, oil refineries pollute extra on the weekend if they.....had "Polluted too..little".....during week days.

Are you testing, now, for the toxins already present,from Coal, Oil and Diesel in our waters, air, and land, before adding more pollution trains here? ...Some politicians do not seem to know the contents of Crude Oil Tankers,so, I ask if you have or have you not explained what is in these cars to them? What should they tell their citizens? Should all with children leave here? Rail Roads used to buy the homes of people they forced out. Why not now?

Response GP667-1

As stated in Draft EIS Chapter 3, Section 3.2, *Air*, although regulations do not apply to mobile sources such as rail locomotives, an analysis of cancer risk from emissions of diesel particulate matter specific to rail transport related to the proposed action was completed for and presented in the Draft EIS. Draft EIS Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP667-2

What alternative modes of transportation are now on standby, in case the traffic is blocked after train accidents. Extra helicopters to get patients to the Hospital Emergency rooms? Why doesn't a transport Corporation pay for help with that?

Response GP667-2

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms.

Final EIS Chapter 4 reflects additional mitigation measures proposed to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP667-3

Nurses want polluters to stop harming people and to pay for their health care when negligent! How will you help???

(541) 400-8935

Thank you
D Simone RN

Response GP667-3

Refer to the Master Response for Liability and Responsibility for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft and Final EIS. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP668, **Sims, Kimberly**

Comment GP668-1

Oct. 6, 2015

Westway and Imperium Terminal
Services Expansion Project EISs
c/o ICF Internatinoal
710 Second St, Suite 550
Seattle WA 98104

RE: Expansion of Gray's [sic] Harbor Facility

To Whom It May Concern:

I am writing to express my opposition to the expansion of the Gray's Harbor oil terminal facility. Please deny this project. Washington State does not want to be a conduit for the transport of fossil fuels to Asia.

Thank you for your consideration.

Sincerely,
Kimberly Sims

9512 130th Ave NE
Seattle, WA 98115

Response GP668-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP669, **Sinclair, Sheri**

Comment GP669-1

I just finished reading the summaries from each area of concern within the EIS Draft. Two sentences provided the red flag. 1) A large oil spill, fire or explosion would likely include unavoidable and significant adverse environmental impacts. 2) The likelihood is low, however, the potential consequence to the environment and human health is high. Also, the graphs of how likely spills would happen and the adverse affects generally indicate that spills will happen especially small and medium spills. That in turn will likely reach water and will have an adverse affect on the environment and human health.

Response GP669-1

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed in the Final EIS.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion.

Comment GP669-2

How can the affected business in the Olympic Gateway Plaza sit idly by as their business will surely be affected by the increase in rail traffic. Which of these businesses support these projects and which object? It's already pretty easy from Montesano to head to Olympia to shop rather then Aberdeen. This would give us one more reason to do just that!

The increase in jobs, which in the long run, isn't many does not make these projects viable for our communities. The risks in all areas is just too high and too many. It is my understanding that many of the longshoremen that work at the Port do not live in Grays Harbor. This means they are not supporting this county with their income. How many of the currently employed longshoremen actually live in Grays Harbor? This whole plan is so short sighted.

Response GP669-2

Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis,* addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP669-3

A large spill and resulting explosion will happen, it's just a matter of when. Our environment and citizens are worth more then a few jobs and padding the pockets of a few highly paid administrators as well as the shareholders. Stop these greedy corporations from destroying our beautiful, abundant and unique land and waterways. Not to mention the short sightedness of continuing to rely on oil for energy. Building such infrastructure and taking such risks for a source of the past. Enough!! This EIS Draft must have cost a fortune for the State to put together. Who paid for it? I certainly hope it was Westway and Imperium and not us taxpayers!! Stop this madness! It is that which is most at risk that is at the core of what is valuable about this county. The county should be focusing on promoting all that we have to better the tourism industry here, rather then put all that we have at risk with these projects. NO CRUDE IN GRAYS HARBOR!

Response GP669-3

A third-party contractor was hired to prepare the EIS. The City of Hoquiam administers the contract and the City and Washington State Department of Ecology oversee and direct the contractor's work. The cost of the analysis, document preparation, and public outreach activities are paid by the applicant.

GP670, **Skinner, Cate**

Comment GP670-1

My name is Cate Skinner and I am the station manner of KXPB radio in Pacific Beach.

As human beings and adults, it is our moral responsibility to leave this planet habitable and healthy for our children and our grandchildren. How do you people sleep at night knowing full well that at some point, if this project is approved, our harbor will experience a major crude oil spill? No more crabbing, no more fishing, no more clam digs. No birds migrating will stop at Bowerman Basin because it will be spoiled, too.

No tourist will visit because our beaches will be covered in oil and dead birds from the Strait of Juan de Fuca to Oregon. My question for you is: How do you look your children and grandchildren in the eye when they ask you, Why did you allow this to happen? I won't wait for an answer, but your children and grandchildren will.

Response GP670-1

Comment acknowledged.

GP671, **Skinner, Kate**

Comment GP671-1

My name is Kate Skinner. I am station manager for KPSB radio in the Pacific Beach. And as human beings and adults, it is our moral responsibility to leave this planet habitable and healthy for our children and our grandchildren.

How do you people sleep at night knowing full well that at some point there will be a catastrophic accident? No more crabbing, no more fishing, no more clam digging, no birds migrating will stop at Bowerman Basin because it will be fouled. No tourist will visit our pristine basin because it will be covered in oil and dead birds.

My question for all of you is how do you look your children and your grandchildren in the eye when they ask you why did you allow this to happen? I don't expect an answer, but they will.

Response GP671-1

Comment acknowledged.

GP672, **Skinner, Wayne**

Comment GP672-1

We are the people who oppose these oil terminal projects. Your EIS predicts one major accident or incident every seven years. Common sense says such frequency is unacceptable.

Also, the EIS predicts a 30 to 50 percent chance of 6.0 or greater earthquake within a 30-year span, unacceptable, and with consequential tsunami and liquefaction.

We are the people who ask you to protect our oceans, our rivers, our livelihoods, our vitality, and our spirit. Help us and the next seven generations to prosper. Do not permit these projects.

We are the people who subsidize the Port of Grays Harbor, 2.3 million in 2015. We generate eight billion dollars in the fishing and marine industries. We subsidize the railroads and the cars still derail. We are the City Councils of Elma and Montesano and Aberdeen who voted no to these projects.

Honor our voices and override the decision of three port commissioners and the Hoquiam Permit Department, respect us and Grays Harbor.

Submitted by: Wayne Skinner, PO Box 22, Chehalis, Washington 98535. Phone: 360-580-3290.

Response GP672-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP673, **Smith, Al**

Comment GP673-1

My name is Al Smith. I'm a Wishram Valley resident. I'm also a member of the Grays Harbor County Marine Resource Committee. My rebuttal statement for this evening's event regarding the Westway and Imperium expansion projects are as follows:

Damage payment. In an event of a spill, who pays when a responsible party goes bankrupt and what is the ceiling payment? In your economic summary, you neglected to mention the approximate loss of $140 of revenue per annum to this county in the event of a oil spill. The slow, cancerous demise of the entire community in the event this happens is daunting at the very least.

The Gulf of Mexico is one of the many pilot demonstrations of what crude oil will do to an aquaculture system, say nothing for what it will do to the human community long-term.

Response GP673-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP673-2

Your failure to talk about how you plan to fight an oil fire is alarming to this retired 40-year volunteer. Your failure to show a plan on how to remove EMS patients in a rail-blocked facility blows me away.

I find it odd that we have developed the technology to remove a heart from a human being and repair it, but do not have the technology or plan to stop a train and break it in half to allow EMS personnel to pass into the blocked area to save a life.

In closing, I will leave you with this coming to truth. As I speak, if we continue to burn ancient carbon and emit CO2, we are merely writing our own epitaph.

Thank you for listening and considering these remarks.

Response GP673-2

As described in Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, increased vehicle delay from trains related to the proposed action would also increase emergency vehicle delay at grade crossings. Delays would affect emergency response times if an emergency vehicle was blocked at a grade crossing occupied by a proposed action train. The potential for the proposed action to affect emergency response would also depend on whether the dispatched emergency vehicle would need to cross the PS&P rail line and the availability of alternative routes if a train occupies the crossing at the time of the call.

Average vehicle delay would slightly increase compared to the no-action alternative at grade crossing between Centralia and Aberdeen. Vehicle delay at grade crossings in Centralia would be

greater; however because emergency response providers are located on both sides of the PS&P rail line, emergency response calls could be dispatched to stations that would not be blocked. The most significant vehicle delay would occur in Aberdeen from rail switching operations near Poynor Yard can block access to the Olympic Gateway Plaza and Port of Grays Harbor areas. Final EIS Section 3.16 reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

GP674, **Smith, Al**

Comment GP674-1

November 30, 2015

Mr. Brian Shay, City Adm.

City of Hoquiam 609 8th Street Hoquiam, WA 98550

Westway & lmperium Terminal Services Expansion Project EIS's c/o ICF International 710 2nd Street Suite 550 Seattle, WA 98104

Dear Sirs:

I first want to thank both parties for providing this opportunity, to speak on the terminal expansion projects.

With regards to the recently released DEIS on the installation and operation of a multi tank farm facility at the Port of Grays Harbor and Hoquiam, I want to re-emphasize to both parties of my continued opposition to this project.

The addressed parties in this letter should, by now, fully understand the reasons why it is not conducive to good environmental health to freight/truck, unload, install, and to operate a bulk crude oil terminal in Grays Harbor County. On points that concern this retired firefighter, I will try to be brief:

Again, and in past experiences of others, the petroleum industry has demonstrated a casual disrespect for the importance of first response issues. It is a foregone conclusion that EMS/training, and adequate location of fire suppression foam storage, in or near populated and unloading centers is paramount.

Your response to spill mitigation measures in the lower Chehalis River System was not specifically addressed to that waterway system. Rather it was presented to the national arena.

You did not address financial responsibility in the event of a major event. Who accepts responsibility when Westway or lmperium LLC files for bankruptcy following a major spill event? In brief, who compensates all of the financially affected businesses, and to what duration will they be paid for their losses? Further what is the ceiling of pay out to the affected businesses?

You did not specifically address the County of Grays Harbor population with a relief plan following a major spill event that will cause irreparable damage to our Chehalis estuary. Bear in mind, 30+ percent of Grays Harbor County's revenue comes from the maritime industry.

Response GP674-1

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP674-2

Your persistence in building these projects on a known liquefaction zone coupled with the close proximity of the Cascadia Subduction zone, has provided this writer nothing more than a sense of distrust in your consultants and engineers arrogance.

Response GP674-2

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP674-3

Your public statement at a recent Aberdeen City Council meeting that you will provide 100's of jobs, is seriously questioned when taking into account the current revenue dollars provided Grays Harbor County from our fisheries industry which is so reliant on a healthy ecosystem.

Response GP674-3

Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7.

Comment GP674-4

In the event you succeed in locating crude oil storage facility (s) in Grays Harbor, what plan is in place to address foreign water ballast disposal in our waters due to an increase in shipping traffic? It is unreasonable to assume bulk oil tanker ships will discharge ballast ten miles or more out of port

during heavy storm events. The possibility of invasive species in ballast water has been demonstrated in every international port around the world.

Response GP674-4

Draft EIS Chapter 3, Section 3.3, *Water*, Section 3.4, *Plants*, and Section 3.5, *Animals*, describe potential ballast water impacts and the regulatory requirements to reduce these impacts. Section 3.4.7.1, *Applicant Mitigation*, and Section 3.5.7.1, *Applicant Mitigation*, identify mitigation measures to further reduce potential impacts.

Comment GP674-5

To paraphrase an August 31,2015 letter from Quinault Indian Nation's, President Fawn Sharp: "It is abundantly clear to us, and to the non-tribal citizens who have joined us in this opposition, that the expansion of Bakken and crude oil traffic is not safe , nor is it in the best economic or environmental interests of our region. This is an area dependent upon healthy natural resources which are jeopardized by these proposals,"

She goes on further to state the track record of the past and current shipping and transportation infrastructure: "We are well familiar with the dismal and tragic record of train accidents and oil spills in this country and in Canada and we want no part of it. Our land, our fish, and our wildlife and our water are far too precious to us to just let this happen without a fight."

In closing, a large number of Grays Harbor residents have opposed these projects and forcing this issue upon us under the guise of long term jobs is very misleading.

Thank you for your time and consideration in the above comments. Respectfully submitted,

Al Smith, Resident Wishkah Valley

Response GP674-5

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP675, **Smith, Jeff**

Comment GP675-1

November 9, 2015

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

Dear ICF International,

Thank you for this opportunity to provide comments.

I am very concerned about climate change, and expanding the oil terminals at the Port of Grays Harbor Terminal I is absolutely the wrong way to go. You're going the wrong way!

In the Northwest we are experiencing shorter winters, less snow, less water in our streams and rivers, more and more extreme forest fires. Our ways of life are changing, and we know, if we don't

radically reduce our reliance on carbon-intensive fossil fuels, things will only get worse. In fact, if we trigger the tipping points by altering our arctic ecosystem, we will threaten the very survival of people on this lovely planet.

It's wrong to cause catastrophic climate change. It's wrong to profit from the resulting environmental and social wreckage.

This is why we need to move rapidly away from investing in the obsolete fossil fuel infrastructure as represented by expanding the existing bulk liquid storage terminals located at the Port of Grays Harbor Terminal 1.

It is unacceptable to make decisions based on climate change denial and obfuscation as practiced by Exxon and others in the oil industry. Like those planning this expansion of oil infrastructure, Exxon knew that its fossil fuel developments would make the climate change, yet, for more than 30 years, they denied this knowledge. We can no longer afford this denial

Instead, Americans must invest our hard-earned capital in renewable energy.

Oil companies want to use the Gorge as a giant oil-by-rail pipeline and make Washington State their hub for transporting, storing, and exporting Bakken crude oil and tar sands oil. The Grays Harbor oil-by-rail export terminal (together with two terminals in Vancouver) would transport 25 million gallons of volatile Bakken crude oil in unsafe rail cars every day through the Gorge. That's 55 fully loaded, mile-long trains every week. Many of these trains will bisect my town, Missoula, Montana.

The cumulative impacts of these projects and explosive nature of this crude oil threaten the safety of my fellow citizens, the millions of people along the rail lines. It's time for people of conscience to resist this new fossil fuel infrastructure. Our children and grandchildren are speaking to us. Please listen. Please say no to expanding the Grays Harbor Terminal 1.

Sincerely,

Jeff Sm1th 105 Channel Drive Missoula, MT 59804

Response GP675-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, describes the projected impacts of climate change in the Pacific Northwest. Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport from likely source to furthest likely destination, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP676, **Smith, Joyce**

Comment GP676-1

Please do not go through with this proposal!! My whole life I have wanted to explore and enjoy the southwestern part of Washington. Now that I have finally reached the age that I can take the time to do so, you threaten to take it all away with a horrible accidental oil spill. With the increased risk of tsunamis, earthquakes, and terrorist acts, it is not a question of "if" it will happen, but "when" it does happen. If this were our last option at energy, then I would say, yes, but it is not. We have so many other options for energy. We do not NEED to send this oil out of the country. If we must drill it here, then let us refine it where it is drilled and use it as close to that area as possible, to lessen the possibility of disastrous results. We do have other options. Let us keep the most dangerous options for last, and enjoy our waters and lands until then.

Response GP676-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP677, **Smith, Joyce**

Comment GP677-1

I strongly oppose shipping crude oil from the Port of Grays Harbor. The environmental risks on the rail line and facilities so close to places like the Gateway Mall, an active fishery, and the National Bird Sanctuary does not make sense. The threat to our estuary, beaches, fishery, shore birds, and the local economy is simply not worth the risks involved and certainly not to encourage the extraction and shipment of bakken crude or other fossil fuels. Biodiesel already shipped from our port presents too great of a risk already given the seismic nature of this area. Please deny permits to move forward with these projects.

Response GP677-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP678, **Snyder, Jeff**

Comment GP678-1

Good evening. I'm Jeff Snyder. I'm from Olympia. I think it was 25, 26 years ago I spent three days out here in Ocean Shores picking up dead birds in an oil spill that happened with the barge. I didn't know if any of you remember that, but it was the worst thing that I've ever experienced in my life.

Opening of the beaks of birds and trying to clean them out with a stick so they could breathe, tagging dead sea lions, their whole heads were covered in oil, watching birds turn and run away. Cormorants running away from us because we were trying to capture them and put them in buckets. We were capturing them in blankets taking them to the cleaning areas in Ocean Shores.

And we brought back -- between the three of us we brought back probably 100 birds, dead, in plastic bags. And when we got back and we were collecting them all we asked what do you want us to do with them, and they said put them in the truck. And it was a refrigerated truck and it was three quarters of the way full of dead birds.

I had to tell them the location of the two dead sea lions, and the harbor seal, and a number of other animals, a dead eagle.

And you tell me if it's worth it. And that's all I ask. Until you're out there cleaning those animals and picking up the dead bodies, I don't think you understand what can happen. And it will happen. It's not an if. It's going to happen.

Thank you.

Response GP678-1

Comment acknowledged.

GP679, **Soares, Jared (Earth Economics)**

Comment GP679-1

The proposed Westway and Imperium Expansion Projects puts local residents and county resources at risk of damages from spills and derailments and should not be approved. The broad effects of increased crude by rail throughout Grays Harbor County have not yet been fully explored.

Economic and environmental impacts have been examined separately, and the relationship between a healthy ecosystem and a thriving economy has been largely ignored. Yet healthy ecosystems are crucial to the health of the economy. The county's manufacturing industry is driven by the availability of naturally occurring raw materials. The natural landscape of Grays Harbor provides a wide range of ecosystem services to the agriculture, timber, and shellfish industries. These services are often unquantified and thus undervalued. Maintaining healthy ecosystems ensures the availability of fertile soils, wood products, shellfish, and fish supplies in the county. Grays Harbor contains 60,000 acres of farmland that produce over $20 million in revenue. The county is also one of the largest producers of timber and shellfish products in Washington State. 88% of Grays Harbor is renewable forestland, and the county produces 12% of the state's timber. Additionally, the natural environment attracts over 7.5 million people for recreation and tourism activities each year and supports nearly 10% of the county's employment. The natural environment creates the landscape that allows these industries to thrive. Earth Economics conducted a nearshore ecosystem service valuation of the direct and indirect benefits of healthy ecosystems to local residents. The study estimated the total worth of Grays Harbor's nearshore ecosystems to be between $313 million and $3.1 billion dollars per year. This value does not take into account inland ecosystems. The proposed projects in Grays Harbor would greatly decrease the value of local ecosystems and damage critical industries that depend on healthy waterways and forestland for production.

Response GP679-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based

on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

Comment GP679-2

Regarding oil spills, the risks and the total damages incurred may be greater than stated. None of the damages within the DEIS include information about ecosystem services, thus the overall damages from a derailment are greatly underestimated. Healthy ecosystems provide the necessary inputs for agriculture, timber, fish, and shellfish industries to thrive. A single oil spill near Grays Harbor Bay could destroy the shellfish, timber, fishing, and agricultural industries throughout the county. The jobs added by the proposed projects do not compensate for the loss of industry in the case of a train derailment and subsequent leak or spill. In 2014 alone, there were 1,193 oil spills in California, Oregon and Washington. This number may be low as many spills and leaks go unreported. Of the reported spills, 15 dumped over 10,000 gallons of oil. Equipment failure was the leading cause of spills (55%). The Northwest region averaged 9 freight train derailments per month (1 derailment every 3 days). Many of the materials to be handled under the proposed action are flammable, increasing the risk of explosion, contamination of waterways, and destruction of natural resources. The Washington State Marine and Rail Oil Transport Study recommended the state hold over $22 million for an oil spill prevention and preparedness program. The frequency of derailments and subsequent damages demonstrates our vulnerability to a catastrophic train derailment. The proposed projects will greatly increase the risk and, consequently, the cost to insure local stakeholders against damages. The proposed actions increase the risks of an already dangerous industry. The estuary of Grays Harbor depends on the natural resources that surround it. The damages from an oil spill are underinsured and underestimated, putting much of the financial and environmental impacts on local taxpayers. The proposed projects leave local residents and industries more vulnerable to train derailment and spills.

Response GP679-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The approach to the analysis of the risk of oil spills is to consider different potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms, including potential impacts on biological and other natural resources that support fisheries, shellfish, and other industries.

Final EIS Chapter 4 reflects additional mitigation measures proposed to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances of an incident, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP680, **Soden, Mary**

Comment GP680-1

Without dignity, of course people are powerless. Strip the land or the person of dignity and you can direct and scheme you wish against them or it, with impunity and with the best of motives. To some this kind of efficiency is a modern technique, lamentable but not evil. For others it is a debilitating degradation, a loss of integrity and spirit that no kind of economic well-being can every justify." Barry Lopez in ARTIC DREAMS. I have seen fires in the Columbia River Gorge nearly ever year since I have lived here, 25. Many are caused from railroad cast outs, sparks and heat. This narrow funnel through the Cascades will not be livable for human beings if you have your way. There is a sickness in men's minds no matter how educated they are, and how willing to corrupt themselves, that is reaching insanity. This land of unique grandeur is not yours to play with. You will mangle the people and the land. Somewhere there are head men who are deciding to move all life backwards. Fire them and stop.

Response GP680-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP681, **Solomon, Laurie**

Comment GP681-1

There are no mitigation measures in place for potential (and historical) oil spills into the ocean or the Columbia River. As recently as 2013, an explosion in Quebec did massive damage and cost many lives. Prior to the Exxon Valdez spill, in 1988, 231,000 gallons of oil spilled into the ocean near Gray's Harbor with devastating consequences to wildlife and fishing for quite some time.

Response GP681-1

Comment acknowledged.

Comment GP681-2

Please don't allow 25 million gallons of crude oil to be transported along the Columbia Gorge on a daily basis. We need to be focusing on using renewable energy, not using our resources to continue to fund oil companies to deplete oil reserves and destroy the planet. Thank you for your consideration of my comment.

Response GP681-2

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP682, **Soman, Michael**

Comment GP682-1

I am a physician and member of Washington Physicians for Social Responsibility. My comments come from a public health perspective. Risks: Tsunami Risk to Terminals: The oil tanks are at risk of being dislodged, spilling contents, and potentially catching fire due to a tsunami triggered by an earthquake along the Cascadia subduction zone. Research documents a major quake at the Cascadia zone has a 30% chance to occur within the next 50 years – modeling from WA State Department of Natural Resources indicates that Hoquiam and Aberdeen are in a tsunami inundation zone. Yet the DEIS states, "current design standards do not require consideration of tsunami risks." Applicants cannot mitigate the impact of tsunami waves of 20 to 100 feet.

Response GP682-1

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Comment GP682-2

Vehicle Traffic Delays Unavoidable: Long delays at rail crossings present major and immitigable consequences for emergency services. Aberdeen is likely to be the at-grade crossing most impacted by delays. Complete blockage will occur. since expected delays will be 35 minutes per train several times a day, this will dramatically affect an EMS system where outcomes are dependent on response times of less than 10 minutes. These delays will be a matter of life and death.

Response GP682-2

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Comment GP682-3

Projects Will Exacerbate Air Pollution: DEIS states, "Increased rail traffic would almost double emissions of criteria pollutants associated with rail transport in county." Onsite operations would release toxic pollutants. Pollutants associated with these projects increase risk of cancers, are associated with lower infant birth weight and increase respiratory death; contribute to impaired

pulmonary development for infants and children; increase the risk of asthma; contribute to neurodevelopmental disorders; and increase risks of lung disease, heart attack, stroke, systemic inflammation, and overall risk of disease and mortality.

Major Train Accidents a Foregone Conclusion: Recent history shows that train derailments are common. U.S. DOT analysis predicts that oil and ethanol trains will derail on average 10x per year during the next 20 years. These derailments will be costly in lives and in dollars. Crude oil coming into Grays Harbor is volatile and flammable Bakken oil, making train transport more dangerous than in the case of other crude oils. In addition to health risks from fires (including burns and smoke inhalation), rescue and cleanup crews face toxic exposures to crude oil.

Response GP682-3

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe potential human health impacts from oil spills, fires, and explosions.

Comment GP682-4

Oil Spill Risks Understated: Oil spills during transport and handling of crude oil over land and water are likely. The DEIS's claim that a medium pipeline or storage tank spill is predicted to occur once in 1,100 years and a large spill once every 22,000 years greatly underestimates the probability of an accidental spill – whether at the port or during a vessel accident. DEIS suggests that medium to large spills during rail transport are moderately to highly likely, and will have a moderate to severe impact. Who would consider this an acceptable risk? Health impacts include neurotoxicity, cancer, lung disease, loss of cognitive function, and endocrine disruption. Contamination of Water: A crude oil spill off Washington's coast adds risk from contaminated seafood. Toxins accumulate in seafood increasing risk to humans who eat seafood. Oil spilled during a derailment threatens drinking water near rail lines. Spills would threaten wells in Spokane, Chehalis, Centralia, Aberdeen, Olympia and Hoquiam Any Risk of Fires and Explosions Presents Serious Risk: Air pollution from fires is a major public health threat. Trains and terminals would be located within population centers, putting residents at risk. chance of associated spills and fires.

Response GP682-4

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks. Additional information on the risk assessment is provided in Appendix M, *Risk Assessment Technical Report.* Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe the human health impacts that could occur as the result of an oil spill, fire, or explosion.

Comment GP682-5

Projects Contribute to Longer-Term Injuries from Climate Change: Climate change is the largest emerging health threat of this century. These projects release greenhouse emissions that contribute to climate change. They also facilitate emissions from the end-use of the crude oil. We can't afford that.

Response GP682-5

Comment acknowledged.

GP683, **Sommers, Louis**

Comment GP683-1

My name is Louis Sommers. I'm a Westport city council member, member of the Washington Dungeness Crab Fishermen's Association, and I've been a fisherman for 40 years. Westport, Grayland, Hoquiam rely heavily on tourism, charter fishing, commercial fishing on the oyster beds and clam beds. We have over 3,000 families live up on our south coast.

When I was a fisherman—when I was a deckhand in the early '80s, we had an oil spill outside of Grays Harbor. It was only 216,000 gallons, but I remember that day like it was yesterday. I remember seeing dead birds floating on top of the water and cleaning buoys.

It took us months to clean buoys. There's 60,000 crab pots out there in the ocean and 120,000 buoys. And it took us over three months to clean them buoys. And it was very devastating to the crab fishermen and our crab. It affected everybody that lived in Westport.

And if we have a spill like this, it will devastate everyone that lives on the coast: Ocean Shores, Westport, Grays Harbor, Hoquiam. I'm opposed to this oil by rail.

Response GP683-1

Refer to the Master Response for Purpose and Focus of the EIS and the Master Response for Geographic Scope of the EIS for additional information about the scope of the EIS.

GP684, **Sowers, Jeff**

Comment GP684-1

Hi. My name is Jeff Sowers. I'm a teacher at East Grays Harbor High School in Elma, Washington, in the blast zone. I'm here today with some of my students who go to school in the blast zone.

The public needs to know what the real risks of this are. And I know when I looked at this Environmental Impact Statement that was the first thing that came to my mind are, what are the real risks in terms of hard numbers that we are really looking at with this proposal.

And so I went looking for that in this rather thick, impenetrable and opaque document, and I did find them. They were there. And I was shocked. Once in 11 years it's predicted that there would be a spill from a collision or derailment resulting in a 10,000-gallon spill likely to reach water, having an impact, a severe environmental impact.

Once every 11 years. And once in every 45 years a spill in a vessel collision in the harbor resulting in a spill of 105,000 gallons with a severe environmental impact. Once in every 43 years for loading, a 10,000-gallon severe environmental impact.

If you add all those together you get a predicted once every seven years a medium to large spill with a severe environmental impact. In seven years.

So based on this report, within seven years we're going to have a serious incident in Grays Harbor County. And once you -- I mean, it's like wow, how can anybody approve something like that. That's insane, that if you can predict within seven years there's going to be this serious incident.

So I went and talked to Brian, I said, Brian -- you know, he's in charge of the City of Hoquiam and part of the process is approving these permits. I said, Brian, how could you approve a permit for -- a shoreline permit where you knew that this would happen? He said that doesn't say that in there. So he didn't even find this information in this document. So I would just urge you to make it more transparent so the public can see what the real risks of these proposals are.

Response GP684-1

As discussed in the Master Response for Environmental Health and Safety and based on the risk assessment in Draft EIS Appendix M, *Risk Assessment Technical Report*, the analysis of risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, evaluates the likelihood of different spill sizes associated with terminal (onsite) operations, rail transportation, and vessel transportation separately. The risks across these operations are not combined in the Draft EIS because of differing regulatory and design requirements described in Chapter 4, because the cause of an incident involving the facility or rail or vessel transport would likely be different, and because the proposed facility, rail line, and vessel transport corridor are physically separated.

The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

GP685, **Spalding, Shelly**

Comment GP685-1

Hi. My name is Shelley Spalding. I have lived in the Elma area for 25 years. And I am very concerned about the high level of danger that their oil transport brings to Northwest communities and waterways.

Accidents impact lives, homes, schools, jobs, drinking water, and so much more. Our communities cannot afford an oil spill or explosion. And for these reasons I urge Ecology and the City of Hoquiam to use this analysis in the Draft Environmental Impact Statements to reject these oil terminal projects. Thank you.

Response GP685-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP686, **Speltz, Greg**

Comment GP686-1

My comments relate to both the Westway and Imperium Draft EISs.

Oil and oil shipments are a major concern of our times. Unfortunately, in the name profits we have polluted the water, the air and often the earth itself - our common heritage. It would be [illegible] immoral to further endanger sloppy [?] coal at Grays Harbor in the name of "progress" This game of chance we cannot afford to play.

Response GP686-1

Refer to the Master Response for Purpose and Focus of the EIS and the Master Response for Geographic Scope of the EIS for additional information about the scope of the EIS.

GP687, **Spike, Wilma**

Comment GP687-1

I'm writing today with my concerns about shipping oil through Grays Harbor. The "bar" leading into Grays Harbor has the distinction of being the second most dangerous bar to cross on the Washington coast. To take tugboats pulling barges carrying oil across this bar is totally stupid! There was one spill in the mouth of the harbor a few years ago, and people have not forgotten. It cost 68,000 birds their lives, plus ruined the beach for clams, tourists, the crab business, etc. In addition to this, we are in a major earthquake zone, so if that were to happen – and they keep saying it's not if – it's when – what happens when the sand the terminals are built on liquifies?? And then there is the threat of tsunamis. They could simple take the terminals right out to sea!

If any of this were to happen here – and it surely will – Ocean Shores can put away their tourist ads, because no one would want to come. Westport would lose it's fishing business, and the people earning their living catching the fish, crab, harvesting oysters, digging and selling clams, may as well move on. Their income would be gone! The seabirds who rest here every year, and do that in only I believe 3 places on earth, where would they go???

And why are we even thinking of doing this?? Big oil is the only one who benefits in this little plot. The companies keep saying it will bring in jobs to this area. This had been proven to be a lie. The few jobs that may end up here certainly do not make up for the losses that will certainly happen from derailment and ocean spills. Or from a natural disaster.

I would certainly hope after reading all the concerns of residents in this area and the whole state, that you see that to even consider letting this happen here is almost laughable. It's maybe the most UN-suitable place to bring the dirty and dangerous crude oil through.

Do the right thing. STOP OIL TRANSPORT IN GRAYS HARBOR

thank you,

Wilma Spike
Ocean Shores, WA
360-289-2553

Response GP687-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures that would reduce the likelihood of a spill

reaching the environment and the potential impacts of an incident As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP687-2

While I have many concerns about the transporting of oil within Grays Harbor, one that is personally high on my list is the health hazards that come with this.

One reason I moved to Ocean Shores was for the clean air. I have lung problems and am the best I can be with the ocean air. The pollutants that will be released from the railroad emissions, the onsite terminals, and the vessels taking the oil out of Grays Harbor would necessitate my moving from this area. There are no regulations at this time to limit these emissions. I am only one of how many residents that could no longer live in our chosen homes and cities.

There also is the risk of increased cancer, including breast and lung cancer. There is the threat that children will suffer from impaired pulmonary development that results in other, life threatening conditions. These are our citizens of the future. Can they not have that future unless they move out of here?

Did we learn nothing from Hanford? People in the small towns surrounding that plant have had a very high percentage of cancers, which is directly linked to the nuclear operation.

When we can foresee the results of transporting, storing, and shipping crude oil out of this beautiful county, why in the name of God, would we let this happen????

I strongly urge you to stop this movement and save the Pacific Northwest for the future generations.

Response GP687-2

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources. Draft EIS Chapter 3, Section 3.2, *Air*, presents emissions estimates of criteria and toxic air pollutants from onsite operations. Considering background concentrations, onsite emissions of criteria pollutants would not cause an exceedance of national ambient air quality standards. Emissions of toxic air pollutants related from onsite stationary sources would be below the state thresholds identified in WAC 173-460-150. As described in Draft EIS Section 3.2, these emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources.

Draft EIS Chapter 3, Section 3.2, *Air*, presents an analysis of cancer risk from emissions of diesel particulate matter from rail transport related to the proposed action. Final EIS Section 3.2 has been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analysis predicts lower emissions; the level of increased risk is not considered significant.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP688, **Stanoway, Ed**

Comment GP688-1

Hi, Ed Stanoway. I'm a new resident of Aberdeen. I am an entrepreneur. I am a local musician and I'm a homeowner here. And we have all listened to people tonight testifying about the environmental impact. People testified about the impact of the quality of life. We've listened to people testified about their tribal concerns.

I'd like to introduce you to a term. This term is cognitive dissonance. Cognitive dissonance is the mental stress or discomfort experienced by an individual that holds two or more contradictory beliefs. Boiled down to a nutshell, what it is is a person knows something is not going to work out for them or in their favor, but they engage in that behavior anyway.

A smoker has one more pack of cigarettes. They deny the cancer studies until they're diagnosed and then they ask, Why me. You have the opportunity here tonight to decide whether this community asks, Why us. You know what is happening. We have all seen the derailments. We have all seen the fires and explosions. You have heard the horror. You have a choice tonight.

Now, is there anybody up here willing to look these people in the eye and tell them that their lives do not matter? If you do, I want you to do that right now. We're all waiting.

Response GP688-1

Comment acknowledged.

GP689, **Stearns, Christopher**

Comment GP689-1

My name is Christopher Stearns—Chris Stearns. And I'm the PUD commissioner for Thurston County. I'm just here on behalf of myself due to my professional expertise in working on shoreline issues throughout the state of Washington for the Department of Fish and Wildlife Habitat Program.

In my past work, I've done a lot of shoreline work on forage fish, specifically herring and smelt. And I'm concerned that any significant oil spill ending up in the Grays Harbor estuary would impact herring runs that go into the southern part of Grays Harbor currently and spawn on the saltbush, which is a rather unique attribute.

Most of the herring in the state do not spawn on saltbush, so it's probably a new unique population only found in Grays Harbor of herring that are spawning there. And that's only been found in the last 10 to 15 years. People were not aware of it before and it just recently came to the attention of the Fish and Wildlife people that were working throughout the state on identifying where all the herring are. So that's one concern I have.

Response GP689-1

Draft EIS Chapter 3, Section 3.5.4.3, *Grays Harbor*, identifies the Pacific herring's use of eelgrass beds for spawning. The impacts from an oil spill on eelgrass are, in turn, referenced in Chapter 4, Section 4.7.1.3, *Animals*, which also acknowledges the potential for disruption of the estuarine and marine food web from oil spills.

Comment GP689-2

The other concern I have is the short line for the rail connection to the Port of Grays Harbor comes through the southern part of Thurston County. And a lot of the bridges and rail crossings have not been upgraded for the kind of traffic that is being contemplated to move oil throughout this part of the state.

Generally, short lines aren't as maintained as well as main connections, where most of this traffic normally goes through our state. And I'm concerned about spillages and how it would impact the fisheries on the Chehalis, which are in a fairly good state. I was once a fisheries biologist for the Chehalis tribe. And significant winters still had runs as well as spring—one of the last remaining wild spring Chinook runs in the state. That is in a healthy state and these should be protected.

So I'm concerned about those runs being impacted by these oil shipments because they have so much volatile organics in them.

Response GP689-2

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP689-3

And they are also a serious concern for most of the first responders who just are not well prepared for an accident if it were a car on this short line.

And as I said, some of it comes through my county as well as Grays Harbor County. And I just don't see that the line is capable of handling the traffic being proposed.

And that's, I guess, all I have to say on the matter, other than hoping that Ecology would take those into consideration. Thank you.

Response GP689-3

Draft EIS Chapter 3, Section 3.15.4.7, *Current PS&P Rail Line Capacity and Operations*, presents the results of the rail modeling analysis of the PS&P rail line capacity. Based on this analysis, the addition of 1.25 trains per day on average to baseline trips would result in approximately 4.25 train trips per day along the rail line, which is approximately one-third of the capacity of the line.

Final EIS Chapter 4, *Environmental Health and Safety*, has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency

response providers, and additional mitigation measures to reduce risks. Refer to the Master Response for Emergency Response and Planning Gaps.

GP690, **Steege, Theodore**

Comment GP690-1

Any initiative that furthers the use of fossil fuels should be denied. It is long past time to take extremely seriously the affect of pumping more greenhouse gases into the atmosphere.

Response GP690-1

Refer to the Master Response for Purpose and Focus of the EIS and the Master Response for Geographic Scope of the EIS for additional information about the scope of the EIS.

GP691, **Steinke, Alana**

Comment GP691-1

Asthma is a terrible disease. I know this, because I have it. Asthma can kill. I know this because, as a pediatric nurse, I was witness to this.

Washington's asthma rate is ranked among the highest in the nation. This includes both adults and youth. Nearly 100 Washingtonians have died from asthma each year. More than 5,000 each year are hospitalized.

Asthma also hurts our state economy. In 2010 Hospitals charged $73 million for asthma related hospitalizations. $4.8 million was charged to patients, $68.5 million to insurance providers, government sponsored programs and charities. $43.1 million was charged to Medicaid and Medicare. We also lost 4.3 million person-days of productivity. As a society, we also pay the cost for decreased student attendance.

One of the biggest contributors to asthma is outdoor air pollution. The World Health Organization stated that air pollution killed 7 million people in 2012. Diesel exhaust from the locomotives contains more than 40 toxic air pollutants, including benzene, arsenic, formaldehyde and NOx., as well as the deadly particulate matter.

The Natural Resources Defense Council estimates that as much as 3% of crude oil in each tank car leaks out into the air as it moves along the tracks; That's 900 gallons of toxic air pollution per car and each unit train is at least 100 cars.

The DEIS suggests that adhering to current regulations will mitigate any additional air pollutants from this project. The EPA has recently stated that the current federal limit on smog-forming pollution linked to asthma and respiratory illness "is not adequate to protect the public health."

Janet McCabe of the EPA said a new, stricter standard is needed to cut dangerous ozone pollution and prevent thousands of asthma attacks, ER visits, and premature deaths.

This increased rail traffic from this project would nearly double the emissions of pollutants from rail transport in the county. There are homes and recreational areas near the site that would be at risk.

Response GP691-1

The dominant air toxic emissions from rail transport are diesel particulate matter emissions from the burning of diesel fuel. Air dispersion modeling of diesel particulate matter emissions was conducted for the proposed action's rail activities between Poynor Yard and the project site, the area with the highest emissions along the PS&P rail line due to rail switching and unloading activities. Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant.

Comment GP691-2

The 59 mile area around Grays Harbor that was studied for this DEIS was woefully inadequate. The increased train traffic would affect everyone along the route from the Bakken, to Spokane, through the Columbia River Gorge and the many cities including Washougal and Camas where the trains run through town and next to schools.

As a retired R.N. with more than 40 years experience, I support the Oregon and Washington Health Care Professionals· Position Statement on Crude Oil Transport and Storage and I urge you to deny the permit for this project.

Alana Steinke, Vancouver, WA

Response GP691-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP692, **Steinke, Alona**

Comment GP692-1

Hello, my name is Alona Steinke. I'm from Vancouver. Asthma is a terrible disease. I know this because I have it. Asthma can kill. I know this because I have been witness to it.

Washington's asthma rate is rated among the highest in the nation. Nearly 100 Washingtonians die from asthma each year. More than 5,000 each year are hospitalized. That's a high cost to pay.

One of the biggest contributors to asthma is outdoor air pollution. Diesel exhaust from the locomotives contain more than 40 toxic air pollutants. It is estimated that as much as three percent of crude oil in each tank car leaks out into the air as it travels. That's 900 gallons of toxic air pollution per car.

The DEIS suggests that adhering to current regulations will mitigate any additional air pollutants from this project. The EPA has recently stated that current federal limits on smog-forming pollution linked to asthma and respiratory illness is not adequate to protect the public health.

That stricter standard is needed to cut dangerous ozone emissions and prevent thousands of asthma attacks, ER visits, and premature deaths. The 59 miles around Grays Harbor is woefully inadequate. The increase in train traffic would affect everyone along the route from the Bakken fields through all the communities where the train often runs through the center of town and right next to schools.

As a retired RN of 43 years, I support the Washington Oregon Healthcare Professional Physician statement on the crude oil transport and storage and I urge you to deny this permit.

Response GP692-1

Refer to Responses to Comments GP690-1 and GP690-2.

GP693, **Steinke, Don**

Comment GP693-1

To the consultants writing the Draft EIS for the proposed Westway and Imperium oil terminals in Grays Harbor by Don Steinke November 2015 Dear Consultants, Ecology and City of Hoquiam. In December of 2014, the Washington State Attorney General sent a letter to the Energy Facility Site Evaluation Council saying the Preliminary EIS for a different oil terminal proposal was deeply flawed. http://www.columbian.com/news/2015/oct/18/official-says-vancouver-oil-terminal-plan-deeply-flawed/ In June of 2015, the Energy Facility Site Evaluation Council of Washington told its contractor to rewrite the Draft EIS because it still did not meet minimum requirements. http://www.columbian.com/news/2015/jul/07/tesoro-savage-state-regulators-blast-each-other-ov/ On August 3, 2015, the EPA and the Army Corps of engineers said the Tesoro Savage plan doesn't pass muster. Have they looked at your plans yet? http://www.columbian.com/news/2015/aug/03/epa-oil-terminal-plan-doesnt-pass-muster/ We found at least 95 shortcomings in the DEIS for the Grays Harbor crude oil terminals.

You need to do a much more inclusive and accurate rewrite. How can the decision-makers make good decisions based on an incomplete and inaccurate report? The projects proposed by Westway and Imperium will have unavoidable and significant adverse impacts in every county the trains travel through. Nowhere in your Draft EIS do you mention that people might burn or die. Nowhere do you mention that oil trains are likely to spill, catch fire and explode in the extended area. Every statement you make in the EIS can be shaded to down play the risks or not. If the oil terminal will generate harms that cannot be mitigated, it is your responsibility to say so. If there is likely to be one non-yard derailment spill every 10 years, don't say the probability is low, say it is certain.

Response GP693-1

Final EIS Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. This section has been revised to more fully describe potential human health impacts. Final EIS Sections 4.4.3, 4.5.3, and 4.6.3 have also been revised to include additional mitigation measures to address risk related to spills, fires, and explosions. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local

jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Comment GP693-2

Your Draft Environmental Impact Statement glosses over the impacts, particularly in the extended rail study area. Our communities have names and there will most likely be property damage, burns, loss of life, and oil in the river as a result of building the oil terminals in Grays Harbor.

Response GP693-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Comment GP693-3

The probability of a derailment spill might be only 1 every 10 million miles which might be classified as low but when the project is likely to generate 44 million miles in 30 years, it would reasonable to declare the project is likely to generate 4 or 5 derailment spills in 30 years. We don't have the correct numbers, but you need to get them from the FRA.

Response GP693-3

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment GP693-4

Significant property damage, loss of life, burns and oil in the river is almost guaranteed to happen and will be unavoidable. You computed the probability of harm for the last 59 miles of the route and we want you to compute that probability for the entire route. A million people who live, work, and drive near the tracks are at risk. Having 2 drunk drivers on the road doesn't mean it is OK to have three. We disagree with your use of the word "low" in this frequently used expression: "Although the likelihood of a large spill, fire, or explosion is low . . ." Either replace the word "low" with the word "high" or ask your consultants to do the math for the entire route and give us an actual number.

Please do a thorough job of evaluating the cumulative impacts on all the affected rail communities if all the coal and oil terminals are approved. I will send omissions and errors later.

Response GP693-4

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, acknowledge the potential for impacts in the extended study area, including the potential for increased risks, qualitatively for the reasons

discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 has been revised to clarify the potential impacts.

Draft EIS Chapter 6, *Cumulative Impacts*, addresses cumulative impacts within the study area. Refer to the Master Response for Cumulative Impact Analysis and the Master Response for the Geographic Scope of the EIS.

GP694, **Steinke, Don**

Comment GP694-1

by Don Steinke November 2015 Dear Consultants, Ecology and City of Hoquiam. Addressing speed limits. Please make this a part of the public record. Please do a thorough job of evaluating the cumulative impacts on all the affected rail communities if all the coal and oil terminals are approved. How can the decision-makers make wise decisions if you withhold information from them? Include in the EIS the fact that the U.S. Rail Chief says the only way to prevent fireballs is to limit speeds to 12 mph. http://www.bloomberg.com/news/articles/2015-03-13/speed-limits-may-not-stop-fiery-oil-spills-u-s-rail-chief-says

Response GP694-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 further describes the potential risks associated with rail and vessel transport in this area. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Refer to the Master Response for Similar or Connected Actions.

GP695, **Steinke, Don**

Comment GP695-1

From Don Steinke Dear Consultants, Ecology and City of Hoquiam. About worst case urban scenario. If you don't do a thorough job of evaluating all the impacts, what recourse do we have? Your EIS needs to include the details of a worst case urban disaster. What is the worst case urban disaster involving oil trains headed to Grays harbor? A train derailed from the elevated tracks in Spokane in 1990, image attached. A train could derail next to the Boeing Drone factory in Bingen, or inside the Camas Paper Mill, or on top of the dike in Vancouver next to the condos and restaurants. http://beniciaindependent.com/wall-street-journal-federal-worst-case-urban-disaster-planning-for-oil-trains/

[Photo reviewed but not reproduced.]

Response GP695-1

Refer to the Master Response for Environmental Health and Safety Analysis for a discussion of the determination of risk scenarios considered in the EIS.

GP696, **Steinke, Don**

Comment GP696-1

From Don Steinke Dear Consultants, Ecology and City of Hoquiam. Re: video of an oil train explosion There have been at least ten oil train explosions. Brian Shay, Ecology, and the citizens need to know what an oil train explosion is like. The EIS needs to include this video. https://www.youtube.com/watch?v=4UnLUofco-0 Please make this comment part of the public record and notify me of action taken.

Response GP696-1

The commenter's comment [video] is part of the public record. The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP697, **Steinke, Don**

Comment GP697-1

From Don Steinke Dear Consultants, Ecology and City of Hoquiam. Re: Cost of major spills Please make this comment part of the public record and notify me of action taken. Please include an analysis of the worst case marine and land spills. Include the total cost, and who would pay if it happened.

The oil spill in the Kalamazoo River shut down the river for a year, and the clean-up cost has exceeded $1.2 billion. What were the economic impacts of those spills? Fishing is a big deal in Michigan and is also in the Pacific NW. Please ask some Coast Guard retirees to describe the impacts of a spill.

Response GP697-1

Refer to Response to Comment GP696-1.

GP698, **Steinke, Don**

Comment GP698-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Economic impacts – building trades Please make this comment part of the public record. 1. The president of the National Building

Trades Association is also a member of the American Petroleum industry. The building trades association is a top down organization. Of course the building trades will speak in support of the terminals. They will support any project that promises union jobs. They'll get their money up front, but the community would be stuck with a dangerous and polluting industry for a lifetime. 2. The building trades spoke in support of the ill advised Satsop Nuclear power project. They got their money up front, but the shareholders and investors lost. 3. Infrastructure dictates destiny. The building trades shouldn't dictate the destiny of Grays Harbor. 4. The building trades are not allowed to care about climate change.

Response GP698-1

Comment acknowledged.

GP699, **Steinke, Don**

Comment GP699-1

Did you notify the city of Vancouver of comment opportunities? Did you notify the Vancouver Columbian? Notify all the newspapers in all the rail communities including Portland, Hood River, The Dalles, Idaho and Montana. Also notify all the city governments in those cities. If people don't know, how can they comment? If the Mayor of Washougal is willing to camp out for a week next to the tracks in protest, certainly his town newspaper should be notified. If the cities of Portland, Vancouver, Seattle, and Spokane have passed resolutions opposing oil trains going through Vancouver, then their newspapers should be notified. If you didn't notify those people, it seems you should and extend the comment period another 45 days. Also the subject line should more reader friendly -- such as Comment sought on Grays Harbor Oil Terminals involving oil trains traveling through your neighborhood. Please make this part of the public record and notify me of action taken.

Response GP699-1

Legal notices for the release of the Draft EIS, comment period, and public hearing were published in the *Washington State Register* (201504472 and 201504475) on August 31, 2015. Email notices were sent to the individuals, tribes, agencies, and organizations listed in Draft EIS Chapter 8, *Distribution List*. A Notice of Availability was published on August 27, 2015, in *The Montesano Vidette*, and a news release was issued on August 31, 2015. Notice of the public hearings and public comment period was published in the following papers: *Centralia Chronicle* and *Aberdeen Daily World* on September 26 and October 3; *Montesano Vidette* on September 24 and October 1.

GP700, **Steinke, Don**

Comment GP700-1

Please include in the EIS some personal stories of people who live and work in Oil Towns. For example, people who move here after driving the NJ turnpike from Newark to Carteret on a hot summers day say they can still smell it just by thinking about it. In Vancouver, Port Commissioner Elect Eric LaBrant writes: "I was down on the coast of the Gulf of Mexico to tour Texas oil towns. An oil terminal can only begin the slide toward altering the landscape, river, and quality of living here. There will be no other direction once it begins. City after city, the downtown core was rotten, a

string of abandoned buildings, boarded up businesses, and For Sale signs. La Marque, Texas City, Orange, Port Neches, Groves. The construction unions in Texas oil towns have been starved to death. And once they've got their foot in the door, big oil is as happy as any other corporation to break unions. The prosperity we're being offered is a poison pill."

Response GP700-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP701, **Steinke, Don**

Comment GP701-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Labor Please make this comment part of the public record. Policy for the Building Trades is developed at the National Level in collaboration with big oil. The oil industry promises union jobs to construction workers in exchange for their visible public support. The Building Trades get short term benefit and then move on, leaving the community with a dangerous and polluting industry and an eventual brownfield. The Building Trades should not determine the destiny of a community. They spoke in favor of the nuclear power plants. They got their money 40 years ago for Satsop and the public and shareholders were stuck with a costly mistake. The Washington State Labor Council on the other hand is sponsoring an initiative to the people to put a price on carbon and use the revenue to transition to the green energy economy. There are far more jobs in renewables than in oil. Instead of sending billions out of state to multinational oil companies, we can use the money to build our own economy. http://www.wslc.org/00resolu.htm#28 It is doubtful that the Port will ever make much money on the deal. Bakken Crude and Tar Sands Crude is only profitable when the price of oil is high. It is likely that the shippers will shut down when the price of oil low. The price of oil is likely to be low into the future as Iran adds 1 million barrels per day and the C.A.F.É. suppresses demand.

Response GP701-1

Comment acknowledged.

GP702, **Steinke, Don**

Comment GP702-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Special Interests Please make this comment part of the public record. It seems to me that the City of Hoquiam should be considered as a special interest. The City may look at the revenue for the City, and ignore the costs to the public in the rest of the state. Public officials are supposed to put State interest above Hoquiam interests. Oil trains will derail and catch fire. People will die. We are willing to accept the risk of death in a car accident, but we are not willing to accept the risk for a product we no longer need and which has so many other harmful impacts.

Response GP702-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP703, **Steinke, Don**

Comment GP703-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Special Interests Please make this comment part of the public record. What will be the impact on insurance rates for properties near the rail lines?

Response GP703-1

Refer to Response to Comment GP696-1.

GP704, **Steinke, Don**

Comment GP704-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Climate Change Primer Please make this comment part of the EIS. No scientist disputes the fact that CO2 is a greenhouse gas. No scientist claims that that nature recycles CO2 as fast as we put it into the air. Every national academy of science agrees that man is exacerbating climate change. The longer we continue business as usual, the more suffering we bequeath to humanity.

Response GP704-1

Comment acknowledged.

GP705, **Steinke, Don**

Comment GP705-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Alternatives Please make this comment part of the EIS The auto industry has spent billions to design alternatives and they are here. The 2016 Chevy Volt hybrid has a range of 420 miles and can average 360 miles per gallon for a person driving 60 miles per day. It goes 53 miles on the battery before the onboard generator fires up to provide 42 mpg. The last 7 miles would use only 1/6 of a gallon. A owner drive 60 miles per day and go 360 miles on one gallon. The owner would save $30,000 worth of fuel in the life of the car. Norway plans to ban new cars which require gasoline, beginning in 2025. Every major automaker is producing a zero emissions vehicle.

Response GP705-1

Comment acknowledged.

GP706, **Steinke, Don**

Comment GP706-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Tribal opposition Please make this comment part of the public record. Include the names of the tribes that oppose oil trains and terminals. The resolution from the Columbia River Inter-Tribal Fish Commission is attached. Lands Commissioner Peter Goldmark has a partial list. http://seattletimes.com/html/opinion/2025059962_goldmarkopedrail20xml.html

Response GP706-1

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP707, **Steinke, Don**

Comment GP707-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Resolutions of opposition Include all the resolutions of concern or opposition from all the communities that would be affected by the oil terminals. Get a copy from Rein Atteman of the Washington Environmental Council. rein@wecprotects.org The City of Vancouver also has on file resolutions from 13 neighborhood associations opposed to the oil terminal in Vancouver, but part of their opposition was related to oil train risk.

Response GP707-1

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP708, **Steinke, Don**

Comment GP708-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Lessons learned from Lac Megantic. Please include a description of the events that took place in the aftermath of the oil train accident in Lac Megantic. We're the fire fighters able to prevent the fire from getting worse? Did flaming oil come up in basement sewers? Has the town been rebuilt? How much did the accident cost? What lessons were learned in Lac Megantic?

Response GP708-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of

associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*. For information about how historical events were considered in the analysis of risks, refer to the Master Response for Risk Assessment Methods.

GP709, **Steinke, Don**

Comment GP709-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Perceived risks Gramor Development was appointed by the City of Vancouver to build a $1.3 billion waterfront development on the Columbia River next to the train tracks. Gramor is concerned that the perceived risks of the oil trains would undermine the success of their project making it much more difficult to pencil out. Mayor Leavitt has said this project is preeminent to SW Washington and is intended to be a world class project. He is also concerned that he might not be able to get insurance. The taxpayers have already spent $50 million to get the property ready.
http://www.thewaterfrontvancouverusa.com/master-plan.html

Response GP709-1

Comment acknowledged.

GP710, **Steinke, Don**

Comment GP710-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Projections of non-yard derailments 1. What is the non-yard accident rate for BNSF? 2. What fraction of the BNSF's non-yard accidents are derailments? 3. Based on BNSF's accident history, project the total number of non-yard derailments that the two terminals could be expected to generate in 30 years on the mainline round trip. http://safetydata.fra.dot.gov/officeofSafety/publicsite/summary.aspx

Response GP710-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail a transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS.

GP711, **Steinke, Don**

Comment GP711-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Volatility of the oil Please include in the EIS

1. Why Bakken crude is more prone to ignite than motor oil?

2. A discussion of B.L.E.V.E. as it relates to oil train explosions.

3. A discussion of the process from spill to ignition to pool fire to BLEVE

4. An explanation of why Tar Sands Crude ignited and exploded in Ontario.

5. The number tank car derailment spills in North America since the beginning of 2013. Include tank cars carrying alcohol, propane, LPG, diluted bitumen, and other crude.

6. What is the vapor pressure of Bakken Crude.

7. What was the vapor pressure of the oil in the Lac Megantic oil train fire?

8. Are sparks rare around trains derailing at 25 mph?

9. What is the slowest speed at which an oil train derailed and caught fire. We believe it was 24 mph in Lynchburg VA

Response GP711-1

The term "explosion" used throughout the Draft EIS, and the assessment of the likelihood and consequences of explosion incidents, refer to boiling liquid, expanding vapor explosions (BLEVE), vapor cloud explosions (VCE), and other types of explosive events that could result from releases of crude oil. As discussed in Final EIS Section 4.5, not all spill events would result in a fire (ignition), and not all fire events would result in an explosion. The Final EIS proposes mitigation that would reduce the potential for oil spills, fires and explosions, but, as noted in Chapter 4, *Environmental Health and Safety*, mitigation would not completely eliminate the possibility of an incident. The approach and methods for analyzing risk of train oil spills, fires, and explosions in the Final EIS is discussed in more detail in Appendix M, *Risk Assessment Technical Report* and the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods, which includes information about how historical events were considered in the analysis of risks. Refer to the Master Response for Purpose and Scope of the EIS.

GP712, **Steinke, Don**

Comment GP712-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Spills Please include in the EIS

1. The costs of the 20 worst oil spills in North America.

2. What fraction of the oil is recovered in a clean-up?

3. What fraction of Bakken crude is benzene, what are the health and environmental impacts of benzene, and what fraction of the benzene is recovered in a spill cleanup?

4. What would be the impacts of an oil spill on the sole source aquifers in Spokane and Vancouver?

5. What would be the impacts of an oil spill on the Chehalis aquifer?

6. How would tar sands crude be cleaned from the Columbia, Cowlitz, and Chehalis Rivers? It sinks.

Response GP712-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP713, **Steinke, Don**

Comment GP713-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Crude Shrinkage Please include in the EIS

1. What percent of the cargo is lost between the wellhead and the refinery. We've seen industry reports of 0.5% to 3%. Power Point Presentation by Alan Mazaud, Energy Resources, Pennsylvania Rail Freight Seminar, May 23, 2013, p. 17.

2. Tell us about the use of infrared cameras to detect fugitive emissions from the tank cars. The Oregon rail inspector says he has heard hissing from oil tank cars. We've heard inspectors are not allowed to use infrared cameras and wonder how then can we adequately asses the health and safety impacts. One of our residents investigated.
https://www.youtube.com/watch?v=35uC1gLctnw

3. Approximately 1% of the fuel is lost from the tank cars due to evaporation. Is this a violation of the clean air act? Discuss the safety and health impacts. Scroll down to Crude Shrinkage.
https://rbnenergy.com/crude-loves-rock-n-rail-brent-wti-bakken-netbacks.

Response GP713-1

Most of the evaporative emission losses associated with rail tank cars transport occurs during the loading of the tank car. Evaporative losses during transport are minimal due to the low vapor pressure. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP714, **Steinke, Don**

Comment GP714-1

From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Greenhouse gas inventory Please include in the EIS

1. Please field-truth your models of methane emissions from oil fields. The old models are not reliable.

2. Your greenhouse gas emissions inventory needs to include the fugitive emissions between the well-head and the refinery.

3. Your greenhouse gases inventory needs to include the fact that 20% of the gas is flared in the Bakken compared with less than 1% nationally.

4. Also include in your inventory the flared or sold gases removed from the crude to reduce its vapor pressure.

5. Discuss incomplete combustion from flaring.

Response GP714-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. Final EIS Section 3.2 and Section 6.5.1.2 have been revised to include emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion, the Master Responses for Purpose and Focus of the EIS, and the Master Response for Geographic Scope of the EIS.

GP715, **Steinke, Don**

Comment GP715-1

DEIS GH From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Malfunction of Vapor Combustion Units Please include in the EIS

1. A discussion of the reliability of the vapor combustion units and this recent incident. ANACORTES — Shell Puget Sound Refinery was fined $77,000 on Nov. 10, 2015 for a February incident that brought numerous complaints of an odor. The state Department of Labor & Industries fined the refinery for two violations relating to improper operation of a flare, a gas combustion device that burns off substances that shouldn't go airborne. The flare also prevents fires or explosions. The more serious violation alleges the refinery skipped decontamination steps when shutting down a flare for maintenance. Skipping those steps exposed workers to toxic substances, according to Labor & Industries. The department cited that as a "willful violation" — the most severe — and docked the refinery $70,000. The second violation was a $7,000 penalty for giving workers the incorrect flare shutdown procedure. Swinomish Indian Tribal Community members were reportedly sickened by the odor. Two people were hospitalized, according to Swinomish Chairman Brian Cladoosby. Source: http://www.goskagit.com/all_access/shell-fined-for-incident-that-caused-odor/article_d71ad98e-9438-5620-9a2b-078f2ef86c23.html

Response GP715-1

As described in Draft EIS Chapter 3, Section 3.2, *Air*, the proposed action is subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and proposed applicant mitigation that would reduce potential impacts on air quality.

Refer to the Master Response for Purpose and Focus of the EIS.

GP716, **Steinke, Don**

Comment GP716-1

DEIS GH From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Tank Car puncture resistance Please include in the EIS 1. A discussion of the speeds at which tank cars can puncture. According to this website, the existing tank cars can puncture at speeds of 10 mph and the next gen tanks cars at speeds above 13 mph. Puncture resistant to 12 mph http://www.thompsonhine.com/publications/dot-proposes-new-tank-car-standards-classification-rules-operational-controls-for-crude-oil-ethanol-transportation

Response GP716-1

Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and that all existing tank cars be retrofitted in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643). However, as noted in Section 4.5.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport?* the risks cannot be eliminated. Refer to the Master Response for the Purpose and Focus of the EIS.

GP717, **Steinke, Don**

Comment GP717-1

DEIS GH From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Tank farm fires and explosions Please include a discussion of several tank farm fires and explosions. Lightning caused: https://www.youtube.com/watch?v=oAsBscxpKks Negligence in Buncefield UK http://www.epsc.org/news_details.aspx?Group=News&Page=final_buncefield

Response GP717-1

Draft EIS Chapter 4, Section 4.4, *Environmental Health Risks—Terminal (Onsite)*, describes the risk and potential for storage failure. Appendix M, *Risk Assessment Technical Report*, describes the data sources for the assumptions of risk assessment for storage tank failure. Because storage tank failure could result from multiple factors, the analysis does not assume any one cause of tank failure. The tank failure rate developed for the analysis is based on studies that analyzed historical data of previous storage tank releases caused by various factors. Refer to the Master Response for Environmental Health and Safety Analysis for additional information.

GP718, **Steinke, Don**

Comment GP718-1

DEIS GH From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Financial Responsibility In the Draft EIS you say the Federal government would pick up the tab for an accident

in the event of slow payment from industry up to $1 billion. Discuss whether or not that is adequate in the event of a tar sands spill in Grays Harbor or in the Columbia. How well would Hoquiam attorneys do against the attorneys for big oil and the rail roads? BNSF has 35 attorneys working full time to fend off lawsuits.

Response GP718-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP719, **Steinke, Don**

Comment GP719-1

DEIS GH From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Wayside detectors and positive train control In your Draft EIS, you mention wayside detectors on the mainline, but don't mention whether or not there were any wayside detectors in the study area. Several years ago, Congress mandated Positive Train Control by the end of 2015 to prevent collisions between freight and passenger trains, but recently the railroads said they won't come close to meeting the deadline. http://www.bloomberg.com/bw/articles/2013-10-24/fcc-plan-to-prevent-train-wrecks-jars-railroads-american-indians

Response GP719-1

PS&P currently does not have positive train control and it is not planned or required. The Federal Railroad Administration specifies that positive train control applies to "Class I railroad main lines (i.e., lines with over 5 million gross tons annually) over which any poisonous- or toxic-by-inhalation (PIH/TIH) hazardous materials are transported; and, on any railroad's main lines over which regularly scheduled passenger intercity or commuter operations are conducted."[2]

[2] Federal Railroad Administration. No date. *Positive Train Control (PTC) Information (Railroad Safety).* Available: http://www.fra.dot.gov/Page/P0358

GP720, **Steinke, Don**

Comment GP720-1

DEIS GH From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Cumulative Impacts If all the proposed coal and oil terminals are approved there would be 25 miles of loaded coal trains per day and approximately 12 miles of loaded oil trains per day passing through neighborhoods which are home to a million people. Please include the cumulative impacts of the trains on: General commerce School bus delays Emergency response delays Public safe Horn noise Public health from diesel emissions Property values Climate

Response GP720-1

Refer to the Master Response for Cumulative Analysis for more information on the scope of this analysis.

GP721, **Steinke, Don**

Comment GP721-1

DEIS GH From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Misc 1 topics related to the oil terminals.

1. The secondary containment for each storage tank in the tank farm needs to be isolated from the others. Otherwise fire from a leak in one tank could weaken other tanks sitting in the same pool, causing other tanks to weaken spill and to exceed capacity of the secondary containment.

Response GP721-1

Secondary containment equipment and design features are subject to federal and state regulations. The proposed action would comply with all state and federal regulations for designing secondary containment.

Comment GP721-2

2. The ultrasound track inspection equipment failed in Gainford Alberta http://www.edmontonjournal.com/Rail+defect+caused+fiery+Gainford+train+crash/10838510/story.html

Response GP721-2

Comment acknowledged.

Comment GP721-3

3. In the Economic Impact Analysis Planning model used by ECONorthwest check to see if the model includes the fact that oil trains are prone to catch fire. It seems the model was designed for standard rail traffic rather than for high volumes of unit oil trains that explode.

Response GP721-3

Draft EIS Appendix O, *Economic Impact Analysis,* does not provide information related to risks of a rail incident. This analysis is presented in Appendix M, *Risk Assessment.*

Comment GP721-4

4. Discuss how inadequate crew size on trains leads to mental errors and inadequate staff in an emergency. A worker recently quit his job as an engineer because his irregular schedule made it impossible for him to stay alert. He nearly hit a car with children twice because he forgot to blow the whistle.

5. Lessons learned from the recent rail worker whistleblower victory in court. http://www.seattletimes.com/seattle-news/railroad-whistle-blower-awarded-125m/

Response GP721-4

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms.

Comment GP721-5

6. The cost of providing adequate staff, evacuation sirens, and equipment for emergency preparedness in all rail communities. NTSB says emergency response planning along the rail routes is “practically nonexistent”.

Response GP721-5

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities in the study area. For more information about the analysis of potential impacts on the BNSF main line, refer to the Master Response for the Geographic Scope of the EIS.

Comment GP721-6

7. Discuss the probability of a derailment in America’s largest landslide area, in the Columbia River Gorge.

Response GP721-6

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5

reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Comment GP721-7

8. The Coast Guard has not updated its regulations regarding loading marine vessels as asked by Congress five years ago, according to a story by Ashly Ahearn of Earth Fix, Public Radio Seattle.

9. Compare the quality of barges as compared with ships in terms of load security.

10. Proper treatment of bilge water.

Response GP721-7

The U.S. Coast Guard inspects or oversees the inspection of tank vessels (including tank barges) in accordance with international and domestic construction standards and mechanical equipment requirements contained in 46 CFR 30.

Comment GP721-8

11. The speed of the train that spilled into the James river was 24 mph. It also caught fire.

12. The four ruptures of the newer safer CPC 1232s in 2015.

Response GP721-8

Comment acknowledged.

Comment GP721-9

13. The impact of greenhouse gases on snow pack and our economy.

Response GP721-9

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, acknowledges that greenhouse gas emissions from the cumulative projects would contribute to global greenhouse gas emissions, which contribute to climate change, and describes the projected impacts of climate change in the Pacific Northwest.

GP722, **Steinke, Don**

Comment GP722-1

DEIS GH From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: 2nd Greenhouse gases inventory comment from Steinke We believe your assessment of the NET change in greenhouse gas emissions in not accurate. The oil terminals in Grays Harbor will lead to a net global increase of up to 70,000 barrels per day more than there would be if the terminals were not built. This figure is based on a study commissioned by The Sightline Institute. Sightline chose Oil Change International to perform the study because they performed the analysis of the Keystone Pipeline climate impacts for the EPA. http://www.sightline.org/research_item/tracking-emissions/ We are in an oil glut. You ignore the impact that increased supply of oil will have on consumer interest in fuel efficient cars.

There are no guarantees that global production of oil will decrease to match domestic increases. Increased supply leads to higher rates of consumption It is not good enough to maintain emissions at a constant level. Our global and state goal is to reduce emissions. We have no hope of stopping climate change if we continue to build new fossil fuel infrastructure. We need to leave fossil fuels in the ground. We need to transition away from fossil fuels, but new oil terminals will strengthen our dependence on them. Once a facility is built, investors such as pension funds will demand a return on investment for the rest of the century. In November of 2014, the United Nations released a report warning that greenhouse gas levels are at the highest they have been in 800,000 years. We have no time to lose before the window of opportunity to stay within 2 C of warming closes. Our emissions need to drop 70% by 2050. 2014 was the warmest year on record and it looks like 2015 will break that record substantially. https://www.washingtonpost.com/news/capital-weather-gang/wp/2015/11/18/2015-will-be-the-warmest-year-on-record-by-an-enormous-margin/

Response GP722-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been revised to include emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. The Final EIS does not make a determination of whether these emissions would add to or replace existing emissions.

GP723, **5, Steinke, Don**

Comment GP723-1

DEIS GH From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: Spills 2 Steinke Please include the following in the EIS

1. A report of the Skykomish WA oil spill that required the downtown to be moved and took decades to clean up. http://skykomish.wednet.edu/news/2015/03/13/school-clean-up/ http://www.skykomishhotel.com/brain-busting-hangover-environmental-scam-exposed/

2. The 2010 oil spill in the Kalamazoo River, shut the river down for over a year. What about a spill in the Columbia, The Cowlitz, the Chehalis, or Grays Harbor or their tributaries? What would be the economic impacts of shutting down river and harbor traffic?

Response GP723-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP723-2

3. Benzene in the river or the Harbor. How much benzene is in the oil and what are its impacts on aquatic environments, and what would be the benzene impacts if 3 tank cars spilled into the Cowlitz or Chehalis Rivers in late August.?

Response GP723-2

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms and has been revised to more fully describe the potential human health impacts, including those related to benzene exposure.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP723-3

4. Please analyze the impacts of a derailment spill on Lake Pend Oreille in Idaho.

5. From the Endangered or Threatened Species List for Montana, Idaho, Washington and Oregon, which ones would be harmed by an oil spill?

Response GP723-3

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Comment GP723-4

6. Your Economic Impact Analysis Planning model needs to include the additional real risks associated with spills on sole source aquifers and marine environments. Two friends in the Coast Guard have told me that it would take a decade for salmon to recover from a spill in the Columbia.

Response GP723-4

Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7.

Comment GP723-5

7. Include the impact of an oil spill on the wildlife refuges along the entire route.

8. A report of recent oil spill clean-up results, such as: http://www.upworthy.com/see-how-the-beaches-in-the-gulf-of-mexico-look-today-5-years-after-the-disastrous-bp-oil-spill?c=sr1&sr_source=lift_facebook

Response GP723-5

Refer to the Master Response for Geographic Scope of the EIS.

Comment GP723-6

9. Tar sands oil through pipelines in the US is exempt from payments into the Oil Spill Liability Trust Fund because diluted bitumen is not classified as oil. Does this still hold and does it apply to rail? http://www.treehugger.com/corporate-responsibility/exxon-wont-pay-cleanup-fund-because-arkansas-oil-spill-isnt-oil.html

Response GP723-6

Excise tax collection is beyond the scope of the Draft EIS. The source of funding for the Oil Spill Liability Trust Fund does not affect how money is paid from the fund to support the costs of an oil spill response and claims against the fund for agency expenses and damages. Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP723-7

10. What would be the health effects of a major vapor release from a spill. http://vancouver.24hrs.ca/2015/05/28/vancouver-spill-could-hurt-1-million-report

Response GP723-7

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe the potential human health impacts from an oil spill, fire, or explosion.

GP724, **Steinke, Don**

Comment GP724-1

DEIS GH From Don Steinke To Consultants, Ecology and City of Hoquiam. Re: More Misc Please include the following in the EIS Sorry my comments are not sorted.

1. Please describe the impacts of depleting our Bakken reserves on national security.

Response GP724-1

Refer to the Master Response for Purpose and Focus of the EIS.

Comment GP724-2

2. Please describe the impacts of decreased oil supply on consumer decisions.

3. Preeminent to Southwest Washington is the $1.3 billion Columbia Waterfront development. What will be the impact of the perceived risk of oil trains on that project? The taxpayers spent $50 million getting this property ready before the first oil train arrived. Now what do we do?

Response GP724-2

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2, has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP724-3

4. Tell us how many days it takes for a round trip for the tank cars. How many tank cars will be required altogether?

Response GP724-3

As stated in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, existing train traffic along the PS&P rail line is between 3.0 and 3.1 trains per day on average and the average train running time between Centralia and Poynor Yard in Aberdeen is approximately 6 hours, including stopping time (sampled over 30 days). The PS&P rail line has a maximum capacity of 12 trains per day and is currently operating well below capacity. Operation of the proposed action at maximum throughput would add 458 unit train trips per year, or 1.25 trips per day on average, along the PS&P rail line. Therefore, with this addition, there would be approximately 4.25 train trips per day along the rail line, which is approximately one-third of the capacity of the line.

Comment GP724-4

5. The Vancouver Fire Fighters have recently declared that they would not be able to protect the public in the event of an oil train fire and explosion.

Response GP724-4

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Refer to the Master Response for Emergency Response and Planning Gaps.

Comment GP724-5

6. Mention that BNSF imposes a $1000 surcharge on the older tank cars, but the newest tank cars have also ruptured and exploded several times this year.
http://blogs.wsj.com/moneybeat/2015/03/18/refiners-sue-railroad-energy-journal/

7. Canadian Pacific Railway wants to stop hauling crude oil, because the risk is too great.
http://m.theglobeandmail.com/report-on-business/industry-news/energy-and-resources/canadian-pacific-railway-wants-to-limit-shipments-of-dangerous-goods/article23298275/?service=mobile

Response GP724-5

Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and that all existing tank cars be retrofitted in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 Federal Register 26643). However, as noted in Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport? the risks cannot be eliminated.

Comment GP724-6

8. Please include the fact that people are likely to burn and die.

Response GP724-6

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe potential human health impacts that could occur as the result of an oil spill, fire, or explosion.

Comment GP724-7

9. OPEC appears unwilling to give up market share and Iran is coming back.

Response GP724-7

Comment acknowledged.

Comment GP724-8

10. Included a risk/benefit analysis for the entire rail corridor.

Response GP724-8

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Comment GP724-9

11. Compare the vapor pressure of the Bakken Crude that is being shipped now, with the vapor pressure of the oil involved in Lac Megantic.

12. At what vapor pressure, would crude oil not produce enough vapor to ignite, in the event of a derailment spill? Consider that even if the vapor pressure in a teakettle is not high enough to make it whistle, it will whistle if jostled.

Response GP724-9

For information about how historical events were considered in the analysis of risks, refer to the Master Response for Risk Assessment Methods.

Comment GP724-10

13. U.S. DOT predicts 10 oil train derailments per year
http://www.seattlepi.com/business/energy/article/AP-EXCLUSIVE-Fuel-hauling-trains-could-derail-at-6095021.php#page-1

Response GP724-10

Comment acknowledged.

Comment GP724-11

14. Discuss the social cost of carbon.

15. Discuss the cost of an inadequate action on climate. For example, the Prime Minister of Fiji recently said that unless strong action is taken this fall, the Pacific Ocean as we know it is doomed.

16. The demand is declining and alternatives increasing, and what we can do to reduce demand.
http://www.greencarreports.com/news/1096706_ca-electric-utility-applies-to-build-25000-electric-car-charging-stations

17. Discuss the economic future of the oil terminals. Climate policies and demand reduction is driving down the price per barrel. Tight shale oil is much more expensive than Saudi Oil and will have trouble capturing market share from. What will you do with the oil terminal in 2030 when the bottom will have fallen out of the market?

Response GP724-11

Refer to the Master Response for Purpose and Focus of the EIS. Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, acknowledges that greenhouse gas emissions from the cumulative projects would contribute to global greenhouse gas emissions, which contribute to climate change, and describes the projected impacts of climate change in the Pacific Northwest.

Comment GP724-12

18. South Portland Maine bans the loading of crude oil from a pipeline into ships over concerns that the emissions from the vapor combustion units would be unhealthy. http://www.environmentmaine.org/news/mee/south-portland-passes-tar-sands-ordinance-final-vote

Response GP724-12

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources. As described in Draft EIS Chapter 3, Section 3.2, *Air*, the proposed action is subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping requirements for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and proposed applicant mitigation that would reduce potential impacts on air quality.

Comment GP724-13

19. Describe the chemical composition of Bakken crude.

Response GP724-13

Refer to Final EIS Chapter 3, Section 3.14, *Hazardous Materials*, and Chapter 4, Section 4.3, *Risk Considerations.*

Comment GP724-14

20. Describe the effect of fracking materials on the properties of Bakken crude. We've heard that the most powerful non-nuclear bombs are made by adding nano-particles to hydrocarbons liquids.

Response GP724-14

Refer to the Master Response for Purpose and Focus of the EIS.

Comment GP724-15

21. You ignored the possibility that rear locomotives could continue to push and derail many tank cars.

Response GP724-15

Refer to Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*, for more information on potential rail accidents and derailments.

GP725, **Steinke, Don**

Comment GP725-1

DEIS GH From Don Steinke To Consultants, Ecology and City of Hoquiam. Errors or invalid assumptions.

1. You say "Heavier oils . . . do not generate many flammable vapors", but the oil train fires and explosions in Timmens and Gogama Ontario in the late winter of 2015 involved Tar Sands Crude. http://www.theglobeandmail.com/report-on-business/industry-news/energy-and-resources/oil-train-derailments-reignite-debate-over-railway-safety-rules/article23039713/

Response GP725-1

The reference in the comment is specific to pooled oil. Draft EIS Chapter 4, *Environmental Health and Safety*, does acknowledge the potential for an incident to result in a fire or explosion, particularly if it involves the high energy of a train derailment. Final EIS Section 4.7, *Impacts on Resources,* has been revised to more fully describe potential air quality and human health impacts related to chemicals released during oil fires.

Comment GP725-2

2. You repeatedly say the risk of a serious accident in the extended area is low. Give us an actual number based on FRA statistics for BNSF. How many derailment spills can be forecast over 30 years?

Response GP725-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action and notes depending on the circumstances of an incident, the impacts could be significant.

The results of the risk assessment are presented in Draft EIS Chapter 4 in terms of the expected number of years between incidents to provide an idea of how often spills of different sizes might happen. For example, a spill of up to 2,100 gallons could occur during vessel loading at the facility once every 8 years. The results were also presented on a per-year basis in Appendix M. For example, the same spill of up to 2,100 gallons could occur at the facility 0.12 time per year. The annual results from Appendix M can be multiplied by any number of years to determine the overall chance of an incident occurring over a longer period, such as the lifetime of the proposed action. For example, over a 50-year period, the same spill of up to 2,100 gallons could occur six times. Refer to the Master Response for Risk Assessment Methods.

Comment GP725-3

3. In your economic summary, you make a chart of economic benefits and costs assuming there would be NO job losses and no fiery accidents or explosions. You didn't include the harm to jobs in the fishing industry. You didn't include the decay that will set in, as people move away.

Response GP725-3

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP725-4

4. You imply the 25 mph speed reduces the risk instead of acknowledging that the tank cars can rupture and catch fire at much lower speeds.

Response GP725-4

The Draft EIS acknowledges that lowered speeds are one of the many factors that can influence the likelihood that a rail incident could occur.

Comment GP725-5

5. Remove sentences like this "Long-term historical data may show that most spills do not result in fires or explosions" You need to focus on non-yard derailment spills.

Response GP725-5

Draft EIS Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*, base the risk assessment on non-yard derailment spills.

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment GP725-6

6. You assume that if one tank car spills from a derailment, the subsequent pool fire doesn't cause other tank cars to heat up, weaken, explode and spill.

7. You assume empty tank car derailments don't cause fire, but the fire chief in Ellensburg says otherwise.

Response GP725-6

The severity of an accident when a derailment occurs would depend on many factors, including but not limited to the speed at which the train was traveling when the incident occurred. The risk analysis applies accident rates from the Federal Railway Administration to the PS&P rail line as discussed in greater detail in Master Response for Risk Assessment Methods; BNSF data are included in this data and analysis. Accidents can occur with empty trains, as mentioned in the Draft EIS, and if an accident sufficiently damages a car and leads to the ignition of the small amounts of residual matter in the "empty" cars, small fires are possible but less likely than for loaded trains. The risk assessment calculated the likelihood of accidents for empty trains, but did not focus on the consequences of such events because there is no potential for large amounts of crude oil being released and spreading, with or without a fire, or for large amounts of vapor to be generated from a release.

Comment GP725-7

8. You assume the impacts to property values of an oil train, is the same as the impacts to property value of a general freight train.

Response GP725-7

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

Comment GP725-8

9. In the event of an accident, you assume the responsible parties will be able to pay for damages and do so in a timely manner.

Response GP725-8

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP725-9

10. You assume that oil production in Alaska and from OPEC might decline in amounts equivalent to the amounts proposed for Grays Harbor. We have no guarantees of that.

Response GP725-9

Refer to Final EIS Appendix Q, *Crude Oil Market Analysis*, and the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment GP725-10

11. You assumed that mud-flows from Mt. St. Helens eruptions would never wipe out the tracks. Even a thunderstorm could trigger a mudflow.

Response GP725-10

Draft EIS Chapter 3, Section 3.1.4.3, *Geologic Hazards (Landslides and Slope Instability),* acknowledges the potential for landslides and slope instability along sections of the PS&P rail line.

Comment GP725-11

12. http://www.bloomberg.com/news/articles/2015-09-21/the-800-ways-taxpayer-money-supports-fossil-fuel-industries

Response GP725-11

Comment acknowledged.

Comment GP725-12

1. Describe the impacts of hydrogen sulfide. It settles in low spots. First it kills your sense of smell. Then it kills you. , and Centralia already exposed to dangerous impacts that can't be mitigated but that doesn't mean it is OK to increase the risks.

Response GP725-12

As described in Draft EIS Chapter 3, Section 3.2, *Air*, onsite emissions of toxic air pollutants related to routine operations of stationary sources, including hydrogen sulfide, would be below the state thresholds identified in WAC 173-460-150. The Final EIS section reflects updated estimates based on a review of recently published Bakken crude oil data. These emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and applicant mitigation that would reduce potential impacts on air quality.

Draft EIS Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Final EIS Seciton 47 has been revised to more fully describe these potential impacts.

Comment GP725-13

2. The people of the State of Washington have the right to decide which risks they are willing to accept and which they are not, and just because some dangerous projects got permission, that doesn't mean we should approve of more risk.

Response GP725-13

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP726, **Steinke, Don**

Comment GP726-1

SEPA requires that the ultimate decisions be within the range of alternatives evaluated in the EIS. And all the alternatives should be included, such as: • Pipelines • Better tank cars, • Tanker trucks • Reducing the vapor pressure. • Other ports • Alternative design configuration • Rail safety improvements • Reducing the size of the project • The State may not be able to order BNSF to carry out alternatives, but it seems that these options reasonably bear on legitimate possible alternatives. • (what about the alternative of hybrid cars?) Please evaluate all the alternatives in the EIS.

Response GP726-1

Refer to the Master Response for Project Objective and Alternatives for an explanation of the alternatives evaluated in the Draft EIS.

GP727, **Steinke, Don**

Comment GP727-1

Hello, I'm Don Steinke. I'm a retired science teacher. If you're opposed to these oil trains, could you please raise your hands? Thank you. Local interest are not supposed to be jeopardizing the rest of the state. Please don't let dollar signs blind you to the harm this project will cause to others.

In Vancouver, our port director asked that the Department of Ecology ignore other communities when they studied the environmental impacts. Did someone in Hoquiam make the same request to the Department of Ecology? We called her and she said, We're not going to study other communities. Who asked her to do that?

We specifically asked you to study the impacts to Vancouver and Spokane, but the DEIS totally ignores us. The Department of Ecology and the City of Hoquiam do not have the right to sacrifice Vancouver for the benefit of special interests.

BNSF averages one nonyard accident per million miles. On that basis, we conclude that these terminals will lead to 44 nonyard accidents in 20 years. Serious accidents are guaranteed. Not low, just guaranteed.

This DEIS doesn't meet the minimum standards. We ask that you totally rewrite the section on the extended area. We ask you to find that these projects will lead to significant and unavoidable adverse impacts and choose the no action alternative.

Thank you.

Response GP727-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, address potential impacts in the extended study area, including the potential for increased risks, individually and cumulatively, respectively. The analysis of impacts in the extended study area is qualitative for the reasons discussed in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6 have been revised to clarify the potential impacts in the extended study area. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

GP728, **Steitz, Jim**

Comment GP728-1

From: Jim Steitz [mailto:jimsteitz@mac.com]
Sent: Tuesday, October 13, 2015 11:18 PM
To: ECY RE Spills Rulemaking <SpillsRuleMaking@ECY.WA.GOV>
Subject: Reject Westway and Imperium Oil Terminals

Jim Steitz
564 Esslinger Drive
Gatlinburg, TN 37738

October 13, 2015

ATTN: Westway and Imperium Oil Terminal EIS
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

To Whom it May Concern,

As a former resident of the Pacific Northwest, who retains great affection for my original home, I urge you to **reject the proposal of Westway Terminal Company and Imperium Terminal Services to ship crude oil through Grays Harbor.**

The volume of oil to be handled by such terminals would constitute an **unmitigated ecological disaster, in violent opposition to the state's objective of reducing carbon dioxide emissions.** The Washington State government has expressed an overall goal of moving toward a lower-carbon economy, and to avoid the worst impacts of global warming. If these goals are to have any meaningful policy expression within the agencies, tasked with carrying out a governor's policy, then the Department of Ecology cannot issue this permit. This oil export terminal would be linked by rail, and in turn link ravenous, inefficient economies overseas, to some of the largest carbon bombs in North America, namely the Canadian tar sands and the Bakken oil shales of the Dakotas. **Human survival demands that this grave liability to our atmosphere remain securely underground.**

The Westway and Imperium terminals, and other proposals for fossil fuel infrastructure along the Pacific Northwest coast, would be especially and painfully ironic for a state that has otherwise made admirable and meritorious progress in shifting to clean energy and ecological sustainability more broadly. I can scarcely fathom the horrific reversal of ecological paradigm that The Westway and Imperium terminals would constitute for **Washington State, whose role in the global energy infrastructure would invert from a leader in the low-carbon transition, to a conduit of death for the highest-carbon fuels on Earth.** The State of Washington has already committed itself to regional greenhouse gas reduction initiatives, and even though the initiatives are not yet self-enforcing, the Westway and Imperium terminals' colossal volume of oil shale and tar sands **would dwarf any carbon reductions attained in those frameworks. It therefore is a contrary and irreconcilable public policy to Washington's goals.**

Even before the climate impacts are considered, the immediate impacts to communities and landscapes between the oil sources and the departure point to the Pacific are numbing. The cities of **Spokane and Grays Harbor would suffer an unacceptable diminution of their quality of life** due to noise, air pollution, and the omnipresent eyesores of tankers and oil-loaded freight trains. Many other communities along the railroads further east would find additional hours of their day transformed into an acoustic and seismic barrage of rail traffic beyond anything they bargained for in joining that community. These oil-freighted trains have compiled a poor safety record in recent months. Their load of heavy crude is known to be even more explosive than lighter-grade oils, and human life is placed at unacceptable risk by running these loads on a recurring basis immediately adjacent to rail-line towns. Moreover, the risk of **oil tanker spills in the precious waters of Grays Harbor and the Pacific Coast cannot be overstated.**The coastline is a defining feature of both economic and aesthetic sustenance for Washington State, and no risk to its integrity should be contemplated.

For all of these reasons, I urge you to immediately **reject the** Westway and Imperium terminals **as contrary to the public interest of both Washington State and your fellow human beings** around the world who depend upon a habitable climate. Thank you for your attention to this urgent issue.

Sincerely,

Jim Steitz

Response GP728-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP729, **Stenger, Joseph**

Comment GP729-1

As a family physician who lived for a time in the Grays Harbor area and a grandfather, I am concerned about the dangers to the population as outlined by PSR including risks of diesel fumes, spills, fires, noise and delay of emergency vehicles.

However, my biggest fears have to do with the inability to safeguard these facilities in the face of a major earthquake and tsunami. As this event is getting more inevitable, we need to put our efforts

into reducing population risk, not building more facilities like this that would create catastrophic damage during such an event.

Furthermore, we in the Pacific Northwest need to be leaders in reducing climate impacts of fossil fuel burning. These projects would add huge tonnage of CO2 every year of their existence. The fact that much of this oil would likely be shipped to other countries does not reduce the risk to all of us. We are already seeing unprecedented changes such as loss of snowpack in our mountains, historic high monthly temperatures, loss of crops, loss of animal and plant populations- we need to reduce the damage already in play to prevent giving our grandchildren a much worse environment to live in than we inherited. Thank you for reading this. Please act in good conscience, considering the true impact over the next decades.

Response GP729-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP730, **Stepp, Patricia Joy**

Comment GP730-1

My name is Patricia Joy Stepp. I'm an elder. I'm a great grandmother, and I have empathy to the Native Americans that will be affected by any oil spill along the Columbia River, along the beautiful estuary, the coast.

I live within a mile -- I'm from Vancouver, Washington. I live within a mile of the Columbia and I live a few blocks from where oil trains are passing all the time where very many people live.

I'm allergic to diesel. Anyway, I've been an environmental activist for many years. I am a Washingtonian. And I think we should think as Washingtonians as we combat this evil that is growing in our state. I know people need jobs, but I think we should think about our children and grandchildren, and in my case our great grandchildren.

I'm Native American descendant, so I'm in empathy with my brothers and sisters here who are fighting to keep their way of life, clamming and all the things that are important to their well-being. And I would like to just speak from my heart and tell you that as we grow older we see things differently than we did when we were young.

And as a retired person who writes and cares about what's going on and reads a lot, I think we should listen to our elders when they're talking about this particular thing. And I think you'll get good feedback from elders. Thank you so much. Please stand up to big oil.

Response GP730-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP731, **Sterr, William**

Comment GP731-1

I am opposed to additional oil facilities in Washington for the following reasons: - oil, and other fossil fuels pose a threat to our environment in their mining, transport, and burning. In additional, the transport of oil by rail has proven to be ecologically and public safety damaging.

- the additional oil trains will pose a threat to the standard of living in our community of Vancouver. - continued low cost access to oil delays our inevitable transition to safer, renewable energy. - acceptance of additional oil terminals will strengthen the position of corporations which have proven themselves again and again to be enemies of the common people.

Response GP731-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP732, **Stokam**

Comment GP732-1

Name: Stokam
Organization:
City/ State/ Zip: Aberdeen, WA 98520

I would prefer that my community/region not be turned into an oil depot.

Response GP732-1

Comment acknowledged.

GP733, **Stonington, Louise**

Comment GP733-1

Please reject the proposed Westway and Imperium oil terminals. The DEIS demonstrates too much potential harm to Grays Harbor. In addition, there are many other risks and harms not adequately explained. There are risks of to our environment by increasing US national security vulnerability caused by added pressures on military from global warming, and also by diminishing US military access to domestic fuels The burning of the fossil fuels being shipped will add additional costs to health of US population.

Lost opportunity costs to businesses and investors of Washington State are a factor. Allowing expansion of trade in fossil fuels, which already control 85% approximately of the energy market, depresses growth in US produced clean energy and efficiency technology and the US is losing ground in this sector to international competition.. Closer to home, the oil trade causes economic loss to Grays Harbor area of shellfish industry which is shown to be under threat by increasing emissions from burning of fossil fuels. The Blind Men and the Elephant is an old story. We have better methods of study today. With computer analysis of billions of measurements we can see the whole picture of

what is happening to the world. We can protect our future if we make reductions of carbon emissions a priority in every business and governmental decision. Thank you.

Response GP733-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP734, **Stormo, Paul**

Comment GP734-1

I am writing to formally express my concern about and resulting opposition to the Westway and Imperium Expansion projects. That concern and related suggestions include:

1. Skepticism that the current and expected price of oil will support the economic model encouraging development of the expansion.

2. Belief that the risk of catastrophic incidents in rail transport to Gray's Harbor are understated, particularly given the four derailments within the last 18 months.

Response GP734-1

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Comment GP734-2

3. The nearly non-existent additional local support for project-related emergency response in case of incident, particularly if a reasonable response time of 15 minutes is established. Bi-annual instruction for local departments, and the addition of one vehicle to support the new activity is woefully insufficient.

Response GP734-2

Final EIS Chapter 4, *Environmental Health and Safety*, has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Refer to the Master Response for Emergency Response and Planning Gaps.

Comment GP734-3

4. Although the estimated rail use time increases three-fold with from current state to maximum expected for the project, no provision has been made to enhance rail-crossing safety, including what would seem to be an obvious addition of controlled access (rail crossing gates) at each intersection within organized cities and towns. Safety instruction alone is not sufficient.

Response GP734-3

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Draft EIS Section 3.16.5, *What are the potential impacts on vehicle traffic and safety?* states that The Railroad-Highway Grade Crossing Handbook–Revised Second Edition (as cited in Section 3.16) indicates that active devices with automatic gates should be considered when certain criteria are met. One criterion is if the expected accident frequency, as calculated by the U.S. Department of Transportation Accident Prediction formula, exceeds 0.075. As shown in Appendix L, *Vehicle Traffic Analysis*, no grade crossings would exceed this frequency using this formula.

Comment GP734-4

5. I find the standards identified for noise 'pollution' significantly insufficient when I find myself waking to the sound of train whistles nightly even though I live 1.5 miles from the tracks. The increased traffic and related noise interruption requires noise barriers be constructed when, at a minimum, schools and medical facilities are within .25 miles of the tracks.

Response GP734-4

Noise exposure values are reported as hourly equivalent sound level (L_{eq}[h]) for Category 1 and 3 land uses, including schools, and day-night average sound level (L_{dn}) for residential land uses (Category 2). The focus of the noise analysis in Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*, is on L_{dn} for locations where people sleep. Daytime loudest-hour noise levels (in terms of L_{eq}) were not analyzed because the loudest hour at grade crossings and wayside locations would generally be characterized by a single train passby, which would be unchanged from existing conditions. The analysis uses the Federal Railroad Administration (FRA) adopted noise assessment methods developed by the Federal Transit Administration (FTA). Per these methods, noise-sensitive land uses are identified within approximately 500 feet of the PS&P rail line for wayside noise and within 1,000 feet of grade crossings for train horn noise.

Comment GP734-5

6. If crossing barriers and noise abatement tools are in place I would strongly suggest suspension, for those areas, of requirements for sounding 'whistles' as the train approaches controlled intersections.

Response GP734-5

Noise barriers were not considered for the proposed action. In general, barriers at grade crossings provide limited benefit to receptors due to noise flanking around barriers near a crossing. Section 3.7 identifies a proposed mitigation measure for the applicant to support local communities in applying for quiet zones at crossing where severe impacts from increased train horn soundings were identified. Where implemented, quiet zones would eliminate sounding of train horns at those crossings.

Comment GP734-6

7. I would strongly suggest that the requirements for availability of monies for 'emergency management' be increased (at least doubled) due to the nature of the product being transported by rail, local derailment incidents, and the recent documented experience of explosive crude derailments. Further, given the nature of the sponsoring companies as Limited Liability Corporations, it is suggested that related principle be held in escrow.

8. One specific and independent organization be identified with the responsibility for confirming (in a form supported by audit) compliance of all parties with the safety requirements of the project (to include, for example, insuring local school district compliance with evacuation plan requirements in case of derailment or leak.)

9. All of the new and incremental costs associated with the above issues (with the exception of the oversight organization noted in item 8) should be the sole responsibility of the businesses owning and/or shipping the related products.

Response GP734-6

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP734-7

10. I fully expect Westway, Imperium, and their related partners should (and therefore suggest that they be required) to estimate revenue and costs for the project, to include incremental short-term and permanent staffing numbers and costs. Such an estimate will confirm the on-going economic feasibility of the project (or not.) Thank you for supporting opportunity to comment on the project. Regards, Paul Stormo

Response GP734-7

Estimates for the short-term and long-term employment impacts associated with the construction and routine operation of the proposed action are provided in Draft EIS Chapter 7, Section 7.1, *Economics*.

GP735, **Street, Nancy**

Comment GP735-1

Thank you for the opportunity to address this panel. I am Dr. Nancy Street, and I live six blocks from the train tracks and two blocks from Eastern Washington University in Cheney, Washington.

The train, we have four intersections at Gray, and we hear the whistles or the horns two longs, a short and a long at every intersection. We happen to live on Kerr so we hear two of them; morning, afternoon, and night.

According to Gus Melonas at BNSF, there were 52 trains on average per day from BNSF going through Cheney. And we also have a Union Pacific track with 12 trains per day. This was information from 2013.

Now, BNSF has double tracks going down to Pasco. We also have a new grain terminal coming in, a high line grain terminal, and that's going to add more trains.

We do not need any more trains. It's very disturbing, the noise is terrible. Babies, senior citizens, patients at the Cheney Care Center, children at schools, high school, grade schools, students at Eastern Washington University are disturbed from their sleep. They develop more stress and anxiety, anger, and generally poor mental and physical health as a result of the trains.

Business owners along the tracks have to stop their business because of the noise of the train. There's just way too much noise. People have moved out of Cheney because of the noise, I know of some in particular.

to address noise pollution and I would like you personally to come over to Cheney and experience the trains. We have all hundred trains going all the time. Thank you very much.

Response GP735-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*. Chapter 6, *Cumulative Impacts*, address potential cumulative impacts.

GP736, **Street, Nancy**

Comment GP736-1

More trains reduce property values & increase fire insurance.

Response GP736-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based

on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3, *Cost-Benefit Analysis,* describes the benefits and range of associated costs that could be expected in general terms, including potential impacts on property values. Final EIS Section 7.3.4.2, has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP737, **Street, Nancy**

Comment GP737-1

Cheney has too many noisy trains now that affect students, babies, elderly businesses, etc. We don't want any more trains!

Response GP737-1

Comment acknowledged.

GP738, **Street, Nancy**

Comment GP738-1

Trains are too dangerous. They block intersections and prevent emergency vehicles from crossing. We don't need more trains!

Response GP738-1

Comment acknowledged.

GP739, **Streiffert, Dan**

Comment GP739-1

Hi, my name is Dan Streiffert, and I live in Kent, Washington. I'm a retired software engineer and currently a chair of the Audubon Society which covers Seattle, King County. There's a section in the DEIS, page 6-10 dealing with greenhouse emissions. Table 6-5 shows the estimated CO2 emission factors associated with combination of the products that will be shipped through the facilities.

From these it is estimated that this will result in an additional 26 million metric tons of CO2 per year. The report then states that this crude oil can only be transported to U.S. in pipelines, which are limited in capacity by law.

Therefore this oil will replace oil currently used in U.S. refineries and there will be no added increases in overall emissions. In fact, compared to the conventional oil drilling, the extraction of these oil Bakken sands is about 12 percent dirtier in terms of CO2 emissions.

So, it would appear that producing the same capacity of oil Bakken sands would, in fact, increase overall emissions. So it appears that the EIS conclusions in this section are incorrect. Furthermore, the House of Representatives is voting to lift the 40-year-old ban on oil exports.

Even if this vote is unsuccessful, if we are to have any hope at all in controlling the climate change, we need to reduce CO2 emissions not simply hold them at the current level. These projects are not carbon neutral and these permits must be denied.

Thank you.

Response GP739-1

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources. Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

GP740, **Strid, Eric**

Comment GP740-1

Section 3.1 Earth Table 3.1-2 lists the probability of a 6.0 or stronger earthquake at 30-40% within a 50-year period. Under Strong Ground Shaking: "Ground shaking would be the strongest in areas underlain by soft soils or unconsolidated deposits such as sand and silt and least in areas underlain by solid rock. The Site Class Map of Grays Harbor County, Washington characterizes the project site as Site Class E, which is the highest level of expected ground shaking due to the type of underlying materials…" This general statement seems to avoid any quantitative analysis of the magnitude of shaking from Class E deposits, which sound like the most prone to instabilities during earthquakes.

Response GP740-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP740-2

The final EIS must include quantitative predictions of the shaking on Class E deposits for earthquakes of magnitude 6.0 through 9.0., along with detailed structural analyses of damage likely in the proposed storage tanks and the implied spills. Under Liquefaction: "The Hoquiam-Aberdeen shoreline, including the project site, is mapped as having a high liquefaction hazard… these areas are susceptible to liquefaction during a strong (6.0 or greater) earthquake." Amazingly, that is the entire analysis of the environmental impact of liquefaction from an incident with 30-40% probability during the project lifetime. Anyone who has witnessed the effects of liquefaction from an earthquake can imagine multiple tanks losing their foundations, rupturing, spilling, and likely catching fire.

The final EIS must include comprehensive quantitative analyses of the foundations of storage tanks and loading structures under liquefaction scenarios expected in earthquakes of magnitude 6.0 to 9.0.

Response GP740-2

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these event and information about the iterative, ongoing risk assessment and design processes commensurate with the project's stage in development.

Comment GP740-3

Under Tsunamis: "Tsunami modeling by Walsh et al (2000) was used to develop hazard mapping for Washington State to characterize tsunami risks for planning purposes…. Based on the model used to develop the mapping, the first tsunami wave would reach Hoquiam in 1 hour, with a wave elevation of about 3.5 feet" and over 11 and 13 feet on the south and north spits. Then a 3,333-year event was said to be capable of waves of 21 to 26 feet height. These predictions compare to the detailed predictions of up to 40 feet in Astoria, 40-80 foot maximum wave elevations in Seaside, Oregon http://www.oregongeology.org/pubs/tim/Clat08_Gearhart_Seaside_Plate1_onscreen.pdf for tsunami evacuation purposes, and recorded maximum heights of 133 feet in the 2011 Tohoku earthquake, which is thought to be similar to a large CSZ event on the Oregon coast. This major discrepancy in the DEIS vs. extensive modeling done for the Oregon coast must be addressed.

Response GP740-3

Draft EIS Chapter 3, Section 3.1.4.3, *Geologic Hazards,* presents the tsunami wave inundation based on the tsunami modeling in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis*. Refer to the Master Response for Seismic Risk and Design Requirements for a description of the earthquake source model and hydrodynamic modeling method used in the site-specific tsunami analysis conducted for the project site and presented in Appendix C.

Comment GP740-4

The final EIS must comprehensively update and revise the expected maximum tsunami heights per more recent models; and then quantitatively model the effects on the proposed storage and terminal structures. Additionally, the effects of larger tsunami waves on marine vessels and loaded tank cars in the terminal must be assessed. These must address earthquake strengths of 6.0 to 9.0.

Response GP740-4

Refer to the Master Response for Seismic Risk and Design Requirements for a description of the earthquake source model and hydrodynamic modeling method used in the site-specific tsunami analysis conducted for the project site and presented in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis*. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce

potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP740-5

Under 3.1.7.1 Applicant Mitigation, the 150-foot pilings proposed are assumed to erase any liquefaction problems, and the implications of the listed standards are not explained and do not seem at all sufficient for the proposed structures in a large CSZ event. The final EIS should propose a site stabilization plan that is certified by at least two independent civil engineering firms to be capable of withstanding a 9.0 earthquake and tsunami without spills from containment structures.

Response GP740-5

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

The project design development and review would adhere to applicable building code requirements. The City of Hoquiam would oversee and review the proposed designs. The City would consider third-party expert review of the proposed geotechnical and seismic design prior to issuance of building permits.

Comment GP740-6

6.5.4 Rail Traffic 6.5.4.1 Study Area does not address the cumulative effects of trains carrying crude oil from oil fields to Centralia. This is a major hole in the DEIS, unless such cumulative effects are addressed elsewhere.

Response GP740-6

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 further describes the potential risks associated with rail transport in this area. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP741, **Strid, Eric**

Comment GP741-1

Good afternoon. My name is Eric Strid. I live in the Bakken blast zone in White Salmon, Washington and recreate in the Columbia River spill zone. The train fires in the Columbia Gorge in the dry season would burn down everything for miles because the only firefighting strategy is to evacuate.

An oil spill on the Columbia will contaminate the fish ladders of the dam. This would require millions to rebuild, and there's no effective method to clean an oil spill anywhere. But not to worry. There are studies of the petroleum consultants that have testified before Congress that hazardous material transported by rail arrives safely at its designation 99.99 percent of time.

The accident data we have clearly shows that BNSF averages one per year and once every 600,000 train miles. And that might sound good, but the 19 oil trains per week that pass near my house log about 600,000 miles every six months. So I checked to see if we had that many oil train derailments. Yes, Seattle last July; Frank, Alberta in February; Culbertson, Montana this July. About every five or six months.

So how could we keep from having derailments in the 160 miles the oil travels near the Columbia River? At the current 19 trains a week, BNSF will average one oil train derailment just along the Columbia once every four years.

Cumulative effect, an added 16 trains will double derailments, and adding another 28 trains to the proposal, on average, would mean one derailment per year along the Columbia. We don't need this oil. We drove here in an electric car, and electric cars keep getting cheaper. I believe by 2040 these terminals will be expended assets. We must stop the fossil fuel madness.

Thank you.

Response GP741-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

GP742, **Strong, Janet**

Comment GP742-1

I incorporate by reference the comments of Friends of Grays Harbor, Ron and Kim Figlar-Barnes, Arnold Martin, Washington Environmental Council, Sierra Club, WA Dungeness Crab Assoc., Physicians for Social Responsibility, Climate Solutions, Grays Harbor Oyster Growers Assoc., Brady Engvall, The Quinault Indian Nation, Dan Leahy, WA State Council of Firefighters, Grays Harbor Audubon Society and Everett Shoreline Coalition.

My personal comments will focus on the total inability of successful mitigation for train derailments on the way to the facilities; for leaks while transferring oil between train cars and storage tanks, or between tanks and ships, or at train car loading facilities; for train car breakage leading to fires, explosions and toxic contamination of air, land and water. It is impossible to mitigate any of these disasters due to the extreme volatility and explosive character of the oil being moved and stored; it is also due to the use of unit trains where each and every car is potentially leading to a chain reaction of explosion magnifying any initial disaster. Especially vulnerable are the cities of Hoquiam and Aberdeen, their citizens, their children (two nearby schools in Hoquiam), the 2500 acre Chehalis Surge-Plain Natural Area Preserve (through which the tracks run, unstable due to the wet soils here), the Chehalis and Columbia Rivers (along which the tracks run), the incredibly valuable fish, shellfish and other aquatic resources, the shorebirds who depend on these resources, the livelihoods of local fishermen, shellfish growers who also depend on these resources, and the Grays Harbor National Wildlife Refuge. Isn't this list long enough to merit denial of these permits? MITIGATION IS NOT POSSIBLE FOR ANY OF THE ABOVE RESOURCES if these storage terminals are constructed to hold millions of gallons of explosive material. MITIGATION IS NOT POSSIBLE for accidents stemming

from train derailments, an increasing number of which have occurred in the past few years. No fire department can be prepared to extinguish a potential fire and explosion. People in Hoquiam will die and homes and businesses will burn. The Port of Grays Harbor will be seriously damaged.

Response GP742-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP742-2

The economic merits of these projects are miniscule for the local communities compared with the very high risk to the people, the infrastructure, the long-run economy and, most importantly, the environment and natural resources of the Grays Harbor ecosystem. For the sake of all of the above, the City of Hoquiam and the Department of Ecology must DENY the permits for these two oil storage facilities and any others proposed in the near or far future. this is indeed a matter of life and death on many levels.

Response GP742-2

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP743, **Strong, Janet**

Comment GP743-1

Hello. My name is Janet Strong. I live in Eastern Grays Harbor County, near the town of McClary.

I'm a biologist, and I have had work as a volunteer at two oil spills, and I can certainly vouch for those comments.

I'm absolutely opposed to siting storage facilities for and bringing these highly flammable oils to to Grays Harbor County. Mitigation? It's impossible to mitigate the disaster that could and will happen.

I own property right along the rail line just east in Central Park, where the grain spill occurred not too long ago, and those soils -- it occurred probably because the soils are saturated. There's tidal action in that area, very active tower action all day every day. A spill, explosion, or fire of oil would reak havoc on this irreplaceable wetlands, old growth forests, sloughs, and then Grays Harbor eventually. This is the largest and best surge plain on the West Coast. I spill would be unmitigatable because of all of the complexity of that whole system.

Homes along here, too, in Central Park would certainly be disastrously affected, and that is unmitigatable.

Another flash point is the ten miles between Malone and Oakville. It's right beside Route 12, a major truck and travel corridor, right beside the Chehalis River, too. A major highway, the Chehalis River, several miles.

The Chehalis Land Trust at which I'm a 20-year volunteer, owns a piece of property right along the tracks between the railroad tracks and the river. Contamination of this river would be carried again to the harbor.

There is no way to mitigate a spill of these explosive crude oils, let alone the inevitable explosions and fires. The results are loss of human life -- oh, well. Please denies these permits. Thank you very much.

Response GP743-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

GP744, **Strump, Larry**

Comment GP744-1

Hi, I'm Larry Strump, and I live in Ocean Shores. And I heard a lot of people speak eloquently about the risks on these trains and granting permits, so I'm not going to belabor that point.

But what I would like to focus on very briefly is the design of this proposal. There's only a few beneficiaries we're talking about here. Two private corporations, a handful of people that they hire to do the work that needs to be done with the new jobs that are created, and the tax revenues that we'll get from the profits that are made.

And frankly, I find it deeply puzzling that the City of Hoquiam and the State Regulatory Agency is giving this serious consideration in the face of potential catastrophes that could happen. They set aside those calamities that are looming.

They will have a pretty serious impact on the quality of life for people that live in this region. Anybody who is out stuck on the wrong side of the train tracks in a Walmart parking lot knows what I'm talking about. I think it's a no-brainer. Please do not permit this. Thank you.

Response GP744-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP745, **Stuckert, Ben**

Comment GP745-1

October 8, 2015

Our city serves as the major rail hub on the Inland Northwest. We used to like that designation. It used to mean that local exporters could get their products to market faster. Being a rail hub used to mean you had an economic advantage. Unfortunately for us, it means we could be the location of the next environmental catastrophe. That rail hub designation is losing its value. The miles and miles of proposed fossil fuel trains are creating significant public safety risks. The alarming increase in mile long explosive oil trains coming through downtown Spokane put our citizens, our first responders, and our economic livelihoods at incredible risk. We've seen the terrifying video of explosions and derailments in North Dakota, West Virginia, and Alabama. I admittedly say that I am not confident our public safety teams and these railroad companies are logistically coordinated enough to handle something as devastating as what has happened in these other states. The bottom line is that we cannot sit idly by and let the next Quebec, Alabama, or North Dakota explosion happen in downtown Spokane, or King County, or any other community across this state. I ask that you thoroughly consider any and all impacts this project will have to the safety, health, and economic security of residents of Spokane.

Ben Stuckert

President Spokane City Council Spokane, WA

Response GP745-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP746, **Sturdivant, Lee**

Comment GP746-1

Our Salish Sea is one of the very few remaining clean inland waterways in the world. Now there is endless pressure from fossil fuel companies to spoil what remains.

We all see that we must leave fossil fuels in the ground if we are to keep this planet alive. The president made that clear by turning down the XL pipeline. You must find the courage to do the same on these oil ports. Future generations will appreciate your efforts to stop these ports.

Response GP746-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP747, **Sunde, Carol**

Comment GP747-1

Hi, I'm Carol Sunde. I live in Westport, Washington. To speak generally, many of us are very concerned about global warming and crude oil storage, and it certainly has implications for this problem. To be more specific, the long-term benefits of these projects are certainly -- the risks of the project far outweigh any benefits for the few.

Grays Harbor and Westport economies are based on the industries that are fishing, crabbing, tourism, which would be devastated when an oil spill, fire, explosion happens. And I say when because Grays Harbor is very vulnerable to earthquakes, storms, tsunamis, and human error.

And further, putting an oil storage facility near the internationally known Bowerman Basin, a premier flyway for shorebirds, seems incredibly irresponsible. I appreciate that a spill does happen and mitigation is planned for. However, according to the current environmental plans, the companies cannot make arrangements for the number of consequences that will happen when these projects, and if these projects, are approved.

I also wonder about how much insurance can and will be purchased to pay for any disasters which will happen.

Thank you.

Response GP747-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Draft EIS Chapter 4, Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP748, **Sunshine, Susan**

Comment GP748-1

It was with dismay that I read the EIS. In topic after topic area I read denial, denial of the very real possibility of the destruction of a rich and important ecosystem. Careful work had been done evaluating individual risks to individual impact areas. What I missed was the overall picture. Each particular facet could be properly assessed and most of the positive assessments, regardless of

category, ended with "unless there was an accident." I found this appalling, distressing, and baffling. It's like counting all the jig-saw puzzle pieces but never putting them together. I did not get the impression that the totality of the marine environment was ever considered, much less the combination of marine and terrestrial blending and interaction. There's a whole world in that harbor and the connecting rivers, islands, wetlands, and ocean environment. This wonderful primordial soup of life is not there for our use and convenience. It is not even there for the Quinault people; though their long interaction with it has been much healthier than what has occurred since Euro-American settlement. It is there because it is there. It is a part of the Pacific Northwest web of life that produces whales and snails, salmon and blackberries whether any humans want them or not. This bit of North American biodiversity is in turn a part of the whole web of planetary life that preceded humanity but may not outlast it at the rate we humans are destroying our very Mother who gives us life and upon whom we depend for air, for water, for food, and for the nurture of our souls. Maybe the EIS is a bureaucratic masterpiece; dotting the "T"s and crossing the "I"s consummately. To my admittedly less-than-objective way of feeling it is the product of a soul-deadened way of thinking that will allow destruction of a life-giving ecosystem by assuming that human being do not have "accidents" or err in their actions and calculations. An assumption based, of course, on our outstanding record of historic perfection in all we do. God help us.

Response GP748-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

GP749, **Sunshine, Susan**

Comment GP749-1

I write with a weary heart and a troubled mind. Washington in general and Grays Harbor most particularly deserve better than the current, disastrous proposal for oil terminals would give them. Whether you look at the rail shipments of oil or the marine shipments, there are too many risks to humans, to marine and terrestrial life, to entire ecosystems which could be destroyed by one false move at any point on the dangerous journey from well to refinery. The EIS cannot be based on what would happen in a perfect world where no accidents occur, no "acts of God", no human error occurs. We have to realistically assess the prospects for trouble-free construction and operation of the terminals, marine and rail safety, natural and unnatural events and what that can mean. Please do not put at risk all the web of life that has evolved and is functioning in the Grays Harbor area. The risks are too great and the rewards non-existent. What reward is there for burning more fossil fuel? It is abundantly clear to me, to you, to anyone with a functioning cerebral cortex that fossil fuels are killing us. So why should we risk destruction of a useful, productive, rich and diverse environment in order to facilitate the transport and use of a deadly substance that is being replaced by cleaner alternatives even while deliberations on these crazy oil terminals go on? Look to the future, not the

past. Recognize that all around us the fossil fuel industry is losing ground. Do not let the dying throes of a dirty and destructive industry take Grays Harbor down with it.

Response GP749-1

Refer to Response to Comment GP748-1. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP750, **Sunshine, Susan**

Comment GP750-1

I have written before with my worries that the Draft EIS is missing the big picture in estimating possible damage to Grays Harbor and Washington from the proposed oil terminals. Thanks to the work of Sightline Institute my worries are confirmed and increased. Their research on the damage and cleanup from the 1988 Nestucca oil spill is not encouraging. The disposal possibilities for oil and refuse is no better than in 1988 and it was not good then. The assistance for affected wildlife is actually worse now. Ecosystem restoration would largely, if not entirely, be paid for by Washington residents. In 1988 the damage was an anomaly today it is quite predictable with proposals for new oil terminals in Grays Harbor. Taking on this risk for the sake of profits for two companies and their enablers is foolish to the point of criminality. Your responsibility is to the people of Washington State not the CEOs and shareholders of private, for-profit-at-any-cost companies.

Response GP750-1

Refer to Response to Comment GP748-1.

Comment GP750-2

The other major concern researched by Sightline is the lack of adequate insurance by Genessee and Wyoming Railroad (G&W) and its local subsidiary Puget Sound and Pacific Line. G&W brought us the November, 2013 derailment and explosion of 90 oil cars in Aliceville, Alabama. That's their safety record. G&W is very secretive about their insurance but it is estimated to be not more than $500,000,000. Not much when one false move in Aberdeen could easily result in $5,000,000,000 in damages. Demand that G&W prove that their insurance coverage is adequate before considering approval of the terminals or that Westway and Imperium agree to be held accountable for any failings of G&W. Again, Washington residents should not pay for the damages incurred by private, for-profit companies; especially when the end result of their activities is climate change which is already causing destruction in our state.

[Attachments: Grays Harbor oil trains would be severly underinsured. October 19, 2015; Washington is (still) unprepared for a Grays Harbor oil spill and our beaches, birds, and pocketbooks would all pay the price. October 21, 2015]

Response GP750-2

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents

for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP751, **Suter, Alice**

Comment GP751-1

Those of us living in Oregon are affected by trains that travel through our beautiful and pristine Columbia Gorge on their way to terminals in Washington. This area is much too valuable for recreational and ecological purposes to have heavy volumes of transported oil going through them. Spills would be devastating. We are definitely opposed to expanding liquid storage terminals at these two sites.

Response GP751-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP752, **Swanson, Steve**

Comment GP752-1

My name is Steve Swanson and Aberdeen is my home. I would like to point out that environmental impacts can't be separated from social consequences and historically the impact of most environmental disasters falls first and most heavily on the poor and the powerless.

This is one of the reasons why it has hired investors to tempt one of the most economically challenged economies in western Washington. It makes perfect business sense to pose something so controversial and dangerous where economic desperation and lack of resources to limit the community's abilities to resist.

But nevertheless, the irony is we're not in a sacrifice zone. Our lives are tied together by our care for one another, and by the river, the harbor and the ocean. I've never seen another place where people stand in the Walmart parking lot for fish or salmon.

We belong to this place as much as it brings to us, but one slip, one accident with these trains and shiploads of poison will erase that connection and break our community for longer than most of us will live. Please do everything you can to make sure this doesn't happen.

Thank you.

Response GP752-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP753, **Swartz, Marilyn**

Comment GP753-1

I oppose these projects because I believe they will harm the local environment-particularly the birds in that area, as well as detrimental to the shoreline & water.

Response GP753-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP754, **Swett, Michael**

Comment GP754-1

I oppose the projects because they would pose a threat to the health and safety of the surrounding population in the form of air and water pollution, explosions and fires. These issues bear further study before the projects are approved.

The Columbia Gorge would lose its wildness which draws tourists from around the world. People making a living on the water would see their livelihoods threatened by the increased number of ships,barges and mile-long unit trains running along the river. It's a bad deal for all but a few.

Response GP754-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP755, **Sword, Carol**

Comment GP755-1

Lac-Megantac, a tragic lesson unlearned. Disaster in our Columbia Gorge. Greed stealing from the commons. Robbing the future with climate disasters. Ossified minds who cannot change.

Response GP755-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP756, **Sword, Carol**

Comment GP756-1

The two crude oil terminals proposed for Grey's Harbor should both be denied. Oil's time is over. Leave fossil fuels in the ground and pursue energy sources that don't contribute to climate change.

Furthermore, Grey's Harbor is a crucial fishing and crabbing habitat. Why endanger this beautiful place simply for someone's greed ? Sincerely, Carol Sword

Response GP756-1

Comment acknowledged.

GP757, **Taylor, Robert**

Comment GP757-1

Hello, I am concerned that the communities of Camas and Washougal, through which any trains supporting these terminals will pass, were not included i the Draft Environmental Impact Statement. These trains will pass through sensitive waterways and near many schools, residences and businesses. Given the problems seen it many other geographies, it seems short sighted to not discuss the potential impact the increased hazardous train traffic will have. What work will be done to analyze this impact? respectfully, Bob Taylor

Response GP757-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP758, **Teneau, Peter**

Comment GP758-1

Westway and lmperium Terminal Services Expansion Projects EISs

Let me express my absolute opposition to both the Westway and Imperium expansion projects as well as all associated rail facilities.

At the conclusion of my reading the EIS, I think it was insufficient in not highlighting the importance of an inevitable subduction earthquake and its simultaneous tsunami. To some extent the danger could be reduced with a robust terminal structure but the magnitude of R 7-8 event and the unpredictability of its consequences could well overwhelm any anticipatory efforts in design and construction. When one considers, in addition to the terminals, a ship dockside, oil trains serving the terminals and ingress and egress of ships in the channel the accumulated risk points toward catastrophe.

Loaded tank cars of Bakken crude entering, detanking and leaving the Port perhaps poses an even greater danger. There is simply no way at all that oil trains on the track can remain standing in a major quake entailing 3-5 minutes of complex ground movement.

Response GP758-1

Draft EIS Chapter 3, Section 3.1, *Earth*, addresses risks related to geologic conditions in the study area, including earthquakes and related hazards such as tsunamis and liquefaction. To inform the

risk of tsunamis at the project site, an updated tsunami model was completed and an updated assessment of tsunami risks specific to the project site is presented in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis*. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how building codes, engineering design standards, and proposed applicant mitigation would reduce impacts of earthquakes and related hazards.

Comment GP758-2

I would-also add, to the consequences of oil by rail, what a list of major cities and small towns from the fracking fields and tar sands to. Grays Harbor would suffer. There is not only life threatening endangerment from derailments; spills and explosions but a host of negative impacts to communities as a result of near capacity rail traffic, longer unit trains and track expansion projects. These are sometimes referred to as mitigation but their purpose is increasing traffic of a product that none of the affected communities will benefit from. Furthermore, I am informed that the lions share of the cost of these "improvements" or adjustments have in the past been borne by State and local governments-not the railroads. What may seem to benefit Grays Harbor is a huge accumulated cost to Native American's rights, livelihood and way of life while degrading the fishery.

A truly accumulative comprehensive analysis would take into account rail transportation, (mostly BNSF), that feeds the Grays Harbor projects. It would include a full assessment of the rail, infrastructure, operations and its plans for future expansion.

* Rail traffic is fast approaching its limit leading to congestion at choke points and exposing critical limitations. This has an impact already on tight scheduling and track use, even with Amtrak affected. The result is delays and rail bottlenecks in critical areas. Because of heavy track demand and usage track maintenance is exacerbated. Additional competition between oil, commodity and intermodal traffic can only raise the cost of the two latter modes. Bidding up prices only benefits BNSF and no one else.

* There are many reports regarding inadequate railroad regulation and inspection -to the dire detriment of safety.

* Negligent maintenance of hundreds of railroad bridges and trestles many reported as decrepit has a short wait to failure.

Regarding the matter of transportation of steam coal or oil and because the breadth of impact is on a regional scale, I consider the transportation of the product easily as important or even transcending that of the Port expansion itself. The impact is environmentally and socially regional.

My intention is not to criticize your effort in this EIS- I thank you for its details and the work put into it. However, my point is that the document does not treat rail transportation with full implications as an inseparable component of terminal expansion. That is not what this EIS does but it should. Will the GHRT EIS be broad enough to cover the region and range of impacts I present here?

To populations from Billings through Spokane, Pasco, the Columbia Scenic Gorge (endangering the river) on to Vancouver to Centralia.

* Splicing dozens of smaller towns between cities.

* Causing division, delay, disturbance, pollution and threat to life.

* Each passing unit train in an ever-increasing presence.

Oil and coal by rail is a ubiquitous affront to the Pacific Northwest both environmentally and its communities at large. Those who profit are not the people.

Fully recognizing the need for jobs in Grays Harbor the two projects along with the GHRT should not be permitted. A smattering of jobs after construction of the terminals and what is left-an oil port. Looking to the future how else may these two cities prosper with more diversification say in Green industry, handling alternative export products likely providing more jobs, while building on its natural assets, improving the environment and better preserving the fishery. This speaks to a better quality of life for all.

Please remember that permitting Westway and Imperium projects will hurt us in other cities and towns. So with the world considering that oil in its extraction, processing and transportation poisons the air we breathe, and despoils the earth leaving a legacy of deadening heat, storms and floods.

Sincerely,

Peter Teneau 2715 N. Terry Street Portland, Oregon 97217

November 24, 2015

Response GP758-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

GP759, **Tharp, Rod**

Comment GP759-1

The DEIS does not adequately address the impacts of a derailment of an oil train. The tank cars cannot be made crashworthy. Non-yard oil train derailment spills are guaranteed to happen in the

extended area several times per decade. There needs to be a complete impact study of the effects and cost of a major oil train crash. An oil spill would have significant and adverse impacts that cannot be prevented or mitigated. At best only 14% of the oil is recovered in a spill. Crude oil contains benzene which cannot be recovered from the water. All of this needs to be in the EIS.

Response GP759-1

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* presents the analysis of risk of oil spills, fires, and explosions related to rail transport related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Section 4.5.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident along the PS&P rail line. Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including a discussion of the potential longer-term impacts. Final EIS Section 4.3, *Risk Considerations,* reflects additional information about factors influencing cleanup.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

GP760, **Tharp, Rod**

Comment GP760-1

A proper EIS will take into consideration the effects of an oil train derailment along the whole length of the tracks that these trains will travel through Washington State. Every city, town, river or other water way, and every stretch of track needs to be included. This should include both oil spill and the flammability of this oil.

Response GP760-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP760-2

The oil vapor pressure cannot be lowered enough to prevent ignition. When tank cars are punctured during a derailment, gases rush out and find a spark. Non-yard derailment spills usually lead to fire. Oil train fires are likely to cause burns, deaths, and property damage. Burns, deaths, and property damage are significant adverse impacts that cannot be prevented or mitigated. This needs to be included in the final EIS.

Response GP760-2

Draft EIS Chapter 4, Section 4.5.2.2, *Fires or Explosions*, addresses potential risks related to fires or explosions associated with rail transport under the proposed action. Section 4.7, *Impacts on Resources*, describes potential impacts of fires and explosion.

GP761, **Tharp, Rod**

Comment GP761-1

The EIS should cover effects of an oil car exploding and the effects on person or animal with in 2 miles of the tracks.

Response GP761-1

Chapter 4, Section 4.7, *Impacts on Resources*, has been revised to more fully describe potential impacts on human health from an oil spill, fire, or explosion. This section also addresses potential impacts on animals.

Comment GP761-2

Until all the tank cars have thermal jackets and high capacity pressure relief valves, tank cars sitting in a pool fire, are likely to explode. Firefighters cannot protect the public in those cases. Oil train explosions will be impossible to prevent for nearly a decade.

Response GP761-2

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* discloses voluntary measures and design features, proposed applicant mitigation, and other measures that would further reduce environmental health and safety impacts from rail transport related to the proposed action, in addition to regulatory compliance and best practices. To the extent possible, within the framework outlined in the Master Response for Mitigation Framework, measures addressing the need for more coordinated and focused planning include the role of the applicant as appropriate. However, as noted, no risks can be eliminated and, depending on the circumstances, significant impacts could occur.

GP762, **Tharp, Rod**

Comment GP762-1

The EIS needs to address the impact of oil trains blocking traffic including emergency vehicles. This impact need to be address for the entire route of these trains and also address as a cumulative impact with other oil train transportation. Oil trains block traffic. They interfere with commerce, emergency response and school buses. The adverse impacts will be significant. There is no practical way to mitigate for blocked traffic.

Response GP762-1

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, addresses potential impacts on vehicle delay and emergency vehicle access. Final EIS Section 3.16 clarifies mitigation and potential significant and unavoidable impacts.

GP763, **Tharp, Rod**

Comment GP763-1

The EIS needs to include extensive impacts from contaminated air around the terminals.On some days the oil terminal will stink, particularly if the vapor combustion units fail. Not only are these fumes smelly but they are also deadly.

Response GP763-1

As described in Draft EIS Chapter 3, Section 3.2, *Air*, the proposed action is subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping requirements for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and proposed applicant mitigation that would reduce potential impacts on air quality.

Comment GP763-2

The EIS needs to address the total environmental impact of air quality from every aspect of handling and storing this oil and include the impact on the health and economic consequences on the adjacent people and business.

Response GP763-2

Draft EIS Chapter 3, Section 3.2.5.2, *Proposed Action*, describes the air quality impacts that could occur in the study area as a result of construction and routine operation of the proposed action. Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action.

GP764, **Tharp, Rod**

Comment GP764-1

The EIS needs to include the effects on the local economy including the decreased livability of the area due to the industrialization of the area which will affect the core of the town.

False Prosperity. An oil terminal can only begin the slide toward altering the landscape, river, and quality of life here. There will be no other direction once it begins. The construction unions in Texas oil towns have been starved to death. And once they've got their foot in the door, big oil is as happy as any other corporation to break unions. The prosperity we're being offered is a poison pill. This cannot be mitigated or avoided.

Response GP764-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4, *What are the costs of the proposed action?* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns*, has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

GP765, **Thevik, Karen Olivia**

Comment GP765-1

My name is Karen O. Thevik I reside in Ocean Shores Washington. My family has been supported by commercial fishing off of the coast of Washington for 45 years.

The preservation of a healthy resource environment is fundamental to the economic success of Grays Harbor and the Coast. The DEIS is painfully lacking in recognition and quantification of impacts and risks to our marine dependent coastal economies.

While the DEIS is deficient in this regard it is accurate when recognizing the fact that the risk from a fire, explosion, or major spill CANNOT be mitigated. If the risks from these projects cannot be mitigated they should not be permitted and should be denied under SEPA.

Response GP765-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP766, **Thevik, Karen Olivia**

Comment GP766-1

My name is Karen Olivia Thevik. I live in Ocean Shores. I am a lifetime resident of Washington State. I am a retired office manager. My husband has been a commercial fisher for 45 years. My families economic survival and way of life has been dependent on a healthy marine environment for decades. I spent three years crab fishing with my husband in the Gulf of Alaska. I have seen the bounty the ocean and our waterways can offer. The oil terminal projects in Gray Harbor pose a grave threat to the marine resource based economies of Grays Harbor and the Pacific coast. The DEIS does a terrible job of capturing the true impacts that making Grays Harbor into a major crude oil export hub would bring. There is a deep rooted and justified concern over the negative impact these projects will bring to our coastal culture, heritage and economies. The benefits will go elsewhere while the risks remain with us. The risks from a major spill or God forbid an explosion cannot be mitigated. The DEIS says as much. As the Public Works Coordinator for the City Of Ocean Shores I worked with the SEPA process. If the impacts are significantly adverse cannot be mitigated and therefore unacceptable the permits can and should be denied.

Response GP766-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP767, **Thevik, Karen Rae**

Comment GP767-1

My name is Karen Rae Thevik. I am a lifelong resident of Washington State. I am retired and recently moved to Grays Harbor. From my residence I have a panoramic view of the Grays Harbor estuary. I have always had an affinity for water and wildlife.

Grays harbor is one of four major staging areas for migrating shorebirds in the Pacific Flyway. It is designated as a Western Hemisphere Shorebird Reserve Network Site and recognized as an internationally significant shorebird habitat. The DIES does very little justice to the importance of protecting the Grays Harbor estuary and the wildlife dependent on it. The DEIS offers no serious mitigation in the event of a major spill event in Grays Harbor that would adversely effect sensitive habitat. The proposed mitigation for the Shorebird Festival is a joke and would have little benefit. The DEIS states several times that the impact of a major spill event cannot be mitigated. While the DEIS has many deficiencies the recognition that catastrophic spill events could occur and cannot be

mitigated should not be ignored. If the risks are significantly adverse and cannot be mitigated then the permitting agencies can and should deny the permits.

Response GP767-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or within Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources,* describes the types of impacts that could result from an oil spill, fire, or explosion, including migrating birds.

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification.

GP768, **Thevik, Maxwell**

Comment GP768-1

My name is Maxwell C. Thevik. I am a student at Western Washington University. I was born in Seattle and am a lifetime resident of Washington State. I often visit Grays Harbor and our coastal beaches. I am very concerned with the transformative nature of the oil terminal projects being proposed in Southwest Washington. The volume of crude oil expected to move though all of the proposed projects, (in Grays Harbor and Vancouver,) will equal half of all crude oil moved through the nation by rail in 2014. In Grays Harbor alone upwards of 3 billion gallons annually. Our coastlines and waterways are a precious resource and all citizens have a right to their bounty and beauty. The mitigation proposed in the DEIS does not offer adequate protection in the event of a major fire, explosion or spill from these projects. The restricted study are does not reflect the true impacts of these projects across our region. Many statements of fact are wrong and the conclusion following false. My generation will inherit the future that follows this EIS process. And if these projects move forward my generation and those that follow will also inherit the unintended consequences and risks they bear. It is incumbent on us all to ensure the EIS process is thorough, robust, and an honest journey to the truth. The core truth of the DEIS cannot be ignored: That the risks from these projects cannot be mitigated. If the risks cannot be mitigated the permits must be denied.

Response GP768-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing

regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 to reduce the likelihood of a spill reaching the environment and the potential impacts if an incident occurs at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

For more information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework.

GP769, **Thevik, Maxwell**

Comment GP769-1

My name is Maxwell C. Thevik. I am a student at Western Washington University. I was born in Seattle and am a lifetime resident of Washington State. I often visit Grays Harbor and our coastal beaches. I am very concerned with the transformative nature of the oil terminal projects being proposed in Southwest Washington. The volume of crude oil expected to move though all of the proposed projects, (in Grays Harbor and Vancouver,) will equal half of all crude oil moved through the nation by rail in 2014. In Grays Harbor alone upwards of 3 billion gallons annually. Our coastlines and waterways are a precious resource and all citizens have a right to their bounty and beauty. The mitigation proposed in the DEIS does not offer adequate protection in the event of a major fire, explosion or spill from these projects.

The restricted study are does not reflect the true impacts of these projects across our region.

Response GP769-1

Refer to Response to Comment GP768-1.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Comment GP769-2

Many statements of fact are wrong and the conclusion following false.

Response GP769-2

The commenter does not provide sufficient details to allow for a response.

Comment GP769-3

My generation will inherit the future that follows this EIS process. And if these projects move forward my generation and those that follow will also inherit the unintended consequences and risks they bear. It is incumbent on us all to ensure the EIS process is thorough, robust, and an honest

journey to the truth. The core truth of the DEIS cannot be ignored: That the risks from these projects cannot be mitigated. If the risks cannot be mitigated the permits must be denied.

Response GP769-3

Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP770, **Thomas, Anita**

Comment GP770-1

May I please request that someone tell me when the yellow lights come on. My name is Anita Thomas. I came up here from Vancouver, Washington, because the trains run by where I live. And it's not just me. I'm also concerned about you. I'm also concerned about those in this community that want these jobs that are desperate enough to take them.

My father was a pipeline welder. I grew up in oil territory as well. My father had us in Wichita Falls, Texas for most of my growing up years, so I know what that is like. And I really urge you, don't do this to your beautiful state. Don't do this.

The problem, one of the many, I'm afraid, with the DEIS impact statement is some of the things it has not covered. The questionability of that rail line that Genesee & Wyoming is running between here and Centralia, I would not trust that company. They were in charge of the rail line where the train in Alabama blew up, the first one in the U.S., November of 2012.

Response GP770-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP770-2

But it's not just that. One thing, even if you have the jobs, this will chase off more jobs than it brings.

And people will not forgive on that aesthetic thing that was left out of that impact statement is the smell. It sounds funny, but if you live next to something that smells that hideous, the people of your community will not forgive you. They will not re-elect you.

Response GP770-2

Final EIS Chapter 3, Section 3.2, *Air*, reflects the addition of a discussion of potential impacts related to odor. The only compound with sufficient emissions to have the potential to have a perceptible odor is hydrogen sulfide. The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, are expected to reduce emissions of air pollutants, including hydrogen sulfide, to below the odor threshold for the most sensitive individual.

GP771, **Thomas, Jan**

Comment GP771-1

Westway and Imperium are existing terminals that share the Terminal 1 Dock at the Port of Grays Harbor in Hoquiam. The proposed expansions would substantially increase terminals' capacity (Westway DEIS, p. 2-3, 2-7; and Imperium DEIS, p. 2-4, 2-9). I have the following concerns about the proposed terminal expansions: • Substantial disruption to tribal use of Grays Harbor: The combined Westway and Imperium expansions will result in Terminal 1 being in use nearly every day of the year (DEIS, p. S-30). This would limit access to the usual and accustomed fishing areas of the Quinault Indian Nation. The DEIS documents offer to mitigate these impacts by telling the tribe to "fish elsewhere" or "pull the nets in sooner" (DEIS, p. 6-26). This does not acknowledge nor respect the unique value of the tribe's reasonable access to fishing in Grays Harbor.

Response GP771-1

As stated in Draft EIS Chapter 3, Section 3.12.7.1, *Applicant Mitigation*, proposes several mitigation measures to reduce impacts of vessel traffic on tribal fishing. These include measures proposing that the applicant coordinate with the Quinault Indian Nation and Washington Department of Fish and Wildlife to support review and possible adjustments of docking schedules, work with stakeholders to establish procedures for announcing vessel arrival and departures, and initiate a process between stakeholders and Quinault Indian Nation tribal officials to discuss and identify additional mitigation measures.

Section 3.12.8, *Would the proposed action have unavoidable and significant adverse impacts on tribal resources?* states that implementation of the proposed mitigation measures would reduce but may not completely eliminate impacts on tribal resources.

Comment GP771-2

There will be more than a doubling of Grays Harbor County rail traffic to approximately 7 trains per day (DEIS, tables 3.15-4 and 6-2). Bakken oil is particularly volatile. Even with the responsible phasing in of safer rail tank cars, communities along the entire rail lines from North Dakota will still be exposed to the risk of derailment and explosion. Coupled with significant rail traffic congestion in places like Spokane, it is only a matter of time before there is a derailment that results in an explosion and/or spill.

Response GP771-2

The voluntary applicant measure calls for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and the retrofitting of all existing tank cars in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643).

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*. Final EIS Chapter 5 reflects additional information characterizing potential

risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Comment GP771-3

The proposed actions would release substantial amounts of carbon dioxide and other greenhouse gases (DEIS, Table 6-4) that contribute to climate change. However, the DEIS documents do not include any release estimates for the greenhouse gases during the refining and ultimate use of the crude oil. The final EIS should include such an analysis.

Response GP771-3

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. Final EIS Section 3.2 and Section 6.5.1.2 have been revised emission estimates from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment GP771-4

The proposed expansions would substantially increase the number of transport vessels on our rivers and coastal waters, increasing the risks to significant aquatic resources.

Response GP771-4

Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Final EIS Chapter 5, *Extended Rail and Vessel Transport*, and Chapter 6, *Cumulative Impacts*, have been revised to clarify the risks under existing conditions, the no-action alternative, and the proposed action in the extended study area. The chapters acknowledge that the proposed action could increase the likelihood of rail and vessel incidents involving an oil spill, fire, or explosion, both individually and cumulatively. However, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions or the no-action alternative. Therefore, the potential consequences are discussed in general terms and are similar to the impacts identified in Final EIS Chapter 4, Section 4.7, *Impacts on Resources*.

Comment GP771-5

After considering all aspects of the proposed expansions of the oil terminals along Grays Harbor, I urge the adoption of the No Action alternative. It is the only responsible way to save our precious Northwest environment.

Response GP771-5

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP772, **Thompson, Carey (Climate Working Group)**

Comment GP772-1

Kate Gesseit Climate Crisis Working Group 86070 Cougar Lane Eugene, OR 97402

Dear Maia Bellon, Director Washington Dept. of Ecology,

Please do not allow oil terminals to be built in Gray's Harbor. The conduits would be conduits of extremely dirty oil that from the time of extraction produce large quantities of greenhouse gases to wreck the atmosphere. In addition, Gray's Harbor is an area of great biological diversity that must be protected.

Sincerely yours,

Kate Gesseit Carey D Thompson Joan Kleba M. Gesseit Manetta O'Byrne Eric O'Byrne

Response GP772-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP773, **Thompson, Sherrie**

Comment GP773-1

My name is Sherrie Thompson. I live in Hoquiam in a blast zone.

My comment is the police department and the fire department are both in the blast zone. I would like to know who's the emergency team?

That's my comment. Thank you.

Response GP773-1

Draft EIS Section 4.2, *Applicable Regulations,* discusses the state and federal emergency response framework that would apply in the event of an incident and notes that local emergency responders would be first on the scene. Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

GP774, **Thrun, Nina**

Comment GP774-1

Testimony on oil shipments, Oct 8, 2015

My name is Nina Thrun

My profession is a Clinical Research Associate. I have worked in Clinical Research for over 18 years. I live in Camas, with my husband.

We moved to Camas 4 years ago from Texas, in order to live in an un-polluted, quiet area. My husband had a heart attack a few years ago and stopped smoking.

The oil trains traveling through Camas will release significant amounts of diesel particulate matter and they will also increase noise pollution.

A review of scientific literature shows that the human body, in particular the cardiopulmonary system, is not equipped to safely process the toxic side effects of air pollution any better than it is able to process cigarette smoke.

Data in medical journals shows that:

Diesel particulate matter

Diesel particulate matter is associated with increased cardiopulmonary mortality and increased heart attack rates. No safe threshold has been established. 1)

Noise pollution

In adults, short term and long term adverse health effects of noise pollution have been documented, including ischemic heart disease and strokes 2), 3)

We are building a house in what we thought was a quiet, unpolluted area. We plan to stay here for the rest of our lives. I am very concerned that the proposed oil trains will increase the cardiovascular adverse health effects on my husband and all Camas residents. Of course, there are many other adverse health effects of diesel particulate matter and noise pollution, but I have focused on one effect with concerns me deeply.

Please study the impact of the proposed oil trains on cardiovascular health and health in general.

References:

The following is a comprehensive review, by the American Heart Association, of 426 journal article references.

1) Particulate Matter Air Pollution and Cardiovascular Disease: An update to the Scientific Statement from the American Heart Association. Circulation 121:2331-2378 P.T.O

2) Selander J, Milsson ME, Bluhm G, Rosenlund M, Lindqvist, M Nise G, Pershagen G. Long-Term exposure to road traffic noise and myocardial infarction. Epidemiology 2009; 20(2) 22 – 279

3) Willich, SN, Wegscheider K, Stallmann Metal. Noise burden and the risk of myocardial infarction. Eur Heart J 206; 27: 276-282

Testimony, Nina Thrun, 612 NE Oak St, Camas, WA. Telephone 360 834 7950

Response GP774-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*, which presents a detailed analysis of potential impacts on air and noise in the study area related to the proposed action.

GP775, **Thrun, Nina**

Comment GP775-1

Hello, my name is Nina Thrun. I have a degree, Bachelor's of Science, in ecology. My profession is clinical research. I've worked in clinical research for over 18 years. I came to speak about the health effects, but I think these have been adequately addressed by previous speakers so I won't reiterate them. And talked about the health professionals, that was mentioned before, and the health risks of the significant amount of diesel particulate matter, and noise pollution, which will affect communities along the Gorge.

We live in Camas, Washington where my husband and I -- we moved to the Camas area from Texas. We wanted to live in a quiet, unpolluted area. I'm changing my speech.

I'm originally from England. And I know and understand the people here need jobs. I grew up in an industrial wasteland. We have had industries for centuries that have devastated our communities. We do not want that here in Washington state.

This is the most wonderful part of the country. Please keep it as it is. And jobs, the BlueGreen Alliance supports a great turning away from fossil fuels to create clean energy and will create jobs in green energy.

In the process, we can create many, many jobs using clean energy. From a personal level, we have built a house in Camas, in the Gorge. We don't want to hear more trains. Thank you for listening.

Response GP775-1

Refer to Response to Comment GP774-1. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP776, **Thurman, Mickey**

Comment GP776-1

I am against placing any crude oil terminals in Hoquiam or any surrounding community. Our ecosystem here is too fragile to risk spills. Increased train spills across the country indicate that improvements need to be made to trains and the containers that carry the oil.

Response GP776-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP777, **Tibbets, Ron**

Comment GP777-1

I'm Ron Tibbets. I live at 710 Monroe in Hoquiam. I'm a Hoquiam City Council person.

I've read most of the summary of the EIS and in every case they say that while the risks are low, the consequences of an event could be catastrophic, and I think that since we live on the Cascadia fault we have a very short geological history in this area that it's absolutely foolish to construct things that could be unmitigated. There is no mitigating a major tsunami or an oil ship being lost on the bar or along the coast. And, if the oil tanks could not survive being hit by a large tsunami, it would be bad enough with the tsunami hitting the harbor without having a coat of oil burning on top of it.

All along the Chehalis Valley, there are bluffs where the train would be knocked off even in a mild earthquake. It is absolutely not something that should ever be allowed in this area.

I believe the prime movers in this are the people who want to export oil. There's a big movement in Congress right now. They're looking at short-term gains to the detriment of the people that live here on the harbor.

Response GP777-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

GP778, **Tieger, Joseph**

Comment GP778-1

Westway and Imperium Projects EISs, c/o ICF International Attn: D. Butorac, B. Shay 710 Second Avenue, Suite 550 Seattle, Washington 98104

Electronic Transmittal-hard copy to follow Butorac@ecy.wa.gov

Dear Ms. Butorac and Mr. Shay:

Others have commented at length on other elements of the documents so I will limit my comments.

Fiscal Risk

Section 3.3 Laws and Regulations for Water and in other sections there are references to the Oil Pollution Act of 1990 (330.S.C.A. §§ 2701-2761) (OPA). As noted the OPA requires that the owner or operator of a vessel or facility establish, subject to certain limitations, evidence of financial responsibility so that funds will be available to respond to a release of oil.

One might ask why a reasonable person would propose to build and operate a facility storing 42 million, or 48 million, gallons of oil on a site subject to seismic soil liquefaction and/or a tsunami if they would be liable for the costs of any response action, the restoration of natural resources, and claims for damages from private parties.

The answer to this question can be found in the Oil Pollution Act at 330.S.C. Section 2703

Defenses to Liability

(A) Complete defenses A responsible party is not liable for removal costs or damages under section 2702 of this title if the responsible party establishes, by a preponderance of the evidence, that the discharge or substantial threat of a discharge of oil and the resulting damages or removal costs were caused solely by-

(1) an act of God;

Therefore the "person" owning or operating a facility that is the source of a catastrophic release caused by a seismic event or a tsunami that, even if the catastrophic release was predictable, is still "an act of god."

Private parties injured by the release would have no course of action under federal law, and possibly state law, for the recovery of damages.

Some measure of the extent of this liability can be found in the costs for these costs could be derived from the costs of the releases at the Kalamazoo River(approximately 793,000 gallons, or the Deepwater Horizon(4.9 million barrels).

If the agencies permitting the construction and operation of these facilities decide that the projects should proceed they will have essentially made the public the "liable party" for the response costs and the restoration of natural resources. It is not the project proponent that bears the fiscal risk of a catastrophic event, it is the public.

Response GP778-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP778-2

Environmental Risk

The EIS goes to great lengths to describe the "mitigation measures" such as training and positioning oil recovery equipment at and near the facilities.

However, as noted in the EIS –

"Average current velocity is about 1.9 knots on the flood and 2.8 knots on the ebb but velocities have been known to reach 5 knots. The direction of the current near the bar can be erratic, running north close inshore and south offshore. In the harbor, current velocities in the navigation channels seldom exceed 3 knots. The tidal cycle in Grays Harbor is mixed semidiurnal (two high tides and two low tides in a 24-hour period with varied heights), which means that tidal height relative to mean low water ranges from less than 1 foot to almost 9 feet twice a day"

This describes the water movement under ordinary conditions which would be more turbulent and difficult under flood or adverse weather.The fact of the matter is that, under the conditions described for Grays Harbor, a significant portion of a large volume of oil spilled into the Harbor will neither be contained, nor recovered. The Oil Spill modeling assumes that a significant portion of the spilled product will evaporate(which is questionable given winter water temperatures) or emulsify.

Grays Harbor, like all estuaries, receives considerable quantities of silt and suspended organic material from the inflowing rivers. In addition, as Grays Harbor is shallow, wind and tidal action re-suspend previously deposited sediment. Oil will attach to these particles creating an "oil particle aggregate" or OPA 1 (hereafter -Report).

"Traditional clean-up methods based on physical recovery of oil slicks on surface waters are ineffective for spilled oil once it submerges.""OPA formation increased with increasing salinity, and at 35 ppt almost11 of the oil was taken up in OPA formation." (Report page 8). Normal seawater is 35ppt.

In an estuary, suspended particles entering with the freshwater interact with the dissolved sodium and chloride ions and begin to aggregate forming a continuum of particle sizes. As noted in the EIS the freshwater being lighter flows over the sea water forming a gradient(a.k.a.-wedge). The suspended particles, including those coated with oil and other contaminants, move both vertically and horizontally with the tides and varying freshwater inflow. As is known by fisherman this mixing zone is an active area for fish and other organisms, large and small. It is also an area where larval fish and invertebrates concentrate to feed on the suspended particulates and where their ingestion and exposure to concentrated contaminants can be injurious.

Depending on inflow, tidal and weather conditions particles suspended in the wedge may remain there for more than one tidal cycle as will any oil entrained. This increases the risk of oil toxicity to the organisms occupying this area.

The OPA also sink to the bottom of the waterway "Recovery techniques for submerged oil and OPAs in freshwater and marine environments still in the development phase." "Where oil is deposited OPAs remains at concentrations that cause concerns for benthic organisms or excessive sheening occurs, dredging may be necessary." (Report page 21)Given the areal extent, varying depths, and other parameters the recovery of large quantities of oil from a release to Grays Harbor is problematic.

Response GP778-2

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and

vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Refer to the Master Response for Oil Spill Modeling Methods for more information on the general approach and assumptions used in the impact analysis for oil spills.

Comment GP778-3

[Footnote: 1Oil-Particle Interactions and Submergence from Crude Oil Spills in Marine and Freshwater Environments -Review of the Science and Future Science Needs, Fitzpatrick, Faith A, Michel C. Boufadel et al. Open File Report, US Geological Survey 2015-1076]

RISK Assessment

"In general, this risk assessment considers the implementation of the proposed actions over a **20-year analysis** period from 2017 (anticipated start of operation) to 2037."

Unless the Project Proponents provide a legally binding assurance that they will cease operations and remediate the site in 20-years a 20-year assessment of the risk posed by this site is absurd. The use and transport of oil has continued since the discovery at Oil Creek Pennsylvania in 1859. It is possible that the use of petroleum will cease within 20-years however, unless provided a factual basis for this assumption, a longer period, 100-years for the risk assessment would be more realistic.

The EIs states:

> "Catastrophic failure of a storage tank is quite unlikely, with a release predicted once in 40,000 or 22,000 years, for Westway and Imperium, respectively."

However: the EIS also states that:

> "At the project site, a magnitude 6.0 earthquake has a 30 to 40% likelihood of occurring once in 50 years. An earthquake of magnitude 9.0 or greater has a lower likelihood of occurring, 6 to 8% chance within a 50-year window. "

And,

> "The 2014 USGS map shows that, for the study area, there is a 2% probability of an earthquake exceeding a PGA of 0.7 g in a 50-year period. As a generalization, this means that in any 50-year period, there is a 2% chance that an earthquake could occur that would result in severe shaking and moderate to heavy structural damage. Ground shaking would be strongest in areas underlain by soft soils or unconsolidated deposits such as sand and silt and least in areas underlain by solid rock. The Site Class Map of Grays Harbor County, Washington characterizes the project site as Site Class E, which is the highest level of expected increase of ground shaking due to the type of underlying materials (Palmer et al. 2004). Similar areas of soft soils also occur along the PS&P rail line and would be susceptible to ground shaking in the event of a magnitude 6.0 earthquake or higher."

And further that:

> The loss of support for overlying layers may result in these overlying layers subsiding or moving laterally(lateral spreading). Liquefaction also contributes to the loss of bearing capacity for shallow foundations. Subsidence or lateral spreading can damage building foundations or lead to building collapse.
>
> "During a CSZ earthquake, coseismic subsidence would occur almost instantaneously and the land in the study area would drop 5 feet or more. Substantial geologic evidence exists of these events in the Grays Harbor vicinity and in Grays Harbor specifically(Atwater 1992; Shennan et al. 1996; Atwater and Hemphill-Haley 1997; Wang et al. 2013). As noted above, the most recent CSZ earthquake and associated coseismic subsidence occurred January 26, 1700 (Atwater et al. 1995; Jacoby et al. 1997; Atwater et al. 2005). Wang et al. (2013) review CSZ earthquake subsidence analyses from a wide variety of CSZ sites from northern California to British Columbia. Based on two sites in the Grays Harbor area that they consider to provide the best basis for determining the amount of local coseismic subsidence from the event, Wang et al. (2013) approximate coseismic subsidence of approximately 2 to 5 feet."
>
> It was found that the berm surrounding the Westway Terminals LLC and Imperium Terminal Services will be overtopped.

Given that the probability of a seismic event severe enough to cause liquefaction is 30-40% every fifty years how is it possible that:

> Catastrophic failure of a storage tank is quite unlikely, with a release predicted once in 40,000 or 22,000 years, for Westway and Imperium, respectively?

What is the probability of a magnitude 6.0 earthquake which has a 30 to 40% likelihood of occurring **once in 50 years**. Or An earthquake of magnitude 9.0 or greater has a lower likelihood of occurring, 6 to 8% chance within a 50-year window" occurring in a 40,000 year or 22,000-year period?

The risks posed by the proposed oil terminals need to be restated. What must be understood is that seismic events and tsunamis are not probabilities but certainties. It is not a question of "if" these events will occur, it is only a matter of when. The physical, fiscal, and environmental risks to the public posed by these proposals are enormous.

It is clear is that the information presented in the DEIS does not present those responsible for authorizing the construction of these facilities, or the public, with a reasonably complete presentation of, or concise analysis of, the fiscal and environmental risks posed by the proposed projects.

Joseph E. Tieger 3412 N. 30th Street Tacoma, WA 253-212-2148

Response GP778-3

As noted in Final EIS Chapter 3, Section 3.0, *Introduction*, the EIS analyzes the impacts that could occur over the lifetime of the proposed facilities. Where evaluated quantitatively, potential impacts were considered for 2017—the anticipated first year of operation—and 2037 to account for future growth and development. This approach provides context to decision-makers about how the impacts of operations would evolve over a reasonably foreseeable period. This is particularly relevant for transportation- and risk-related impacts that can evolve over time because of reasonably foreseeable increased growth, planned infrastructure changes, and phased regulatory requirements for improved transportation efficiency and safety.

Draft EIS Chapter 4, Section 4.4, *Environmental Health Risks—Terminal (Onsite),* describes the risk and potential for storage failure. Appendix M, *Risk Assessment Technical Report,* describes the data sources for the assumptions used to conduct the risk assessment for storage tank failure. As noted in Appendix M and in the Master Response for Risk Assessment Methods, the risk assessment addresses any single causal event but considers the risks of selected release scenarios regardless of the causal event. The tank failure rate developed for the analysis is based on studies that analyzed historical data of previous storage tank releases caused by a variety of different factors including weather-related factors.

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

The likelihood that a seismic event would occur is unchanged as the result of the proposed action; however, as noted in Section 3.1, *Earth,* there is the potential for increased risk of harm to property and people as the result of the proposed action. The increased potential for exposure to crude oil is addressed in Section 4.4. As discussed in Section 4.7, *Impacts on Resources,* depending on the specific circumstances of an incident, the potential environmental impacts could vary but do have the potential to be significant. Final EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, reflects the addition of information on the range of impacts—including societal costs—that could occur in the event of an incident.

GP779, **Tim**

Comment GP779-1

I'm Tim. I work through the Local 737 in Portland, Oregon and I live in Stevenson, Washington. Stevenson is a little town along the tracks. We have businesses, community buildings, and elementary school, and water supply around them. The Post Office and volunteer fire department are within a few feet of the tracks as well. There's probably a lot of towns, like us, along the various routes, kids growing up in these towns.

We've been experiencing higher temperatures, lower water levels than normal. This isn't normal. This is insane. The tankers along Puget Sound or the Gorge, anywhere else can kill or maim a lot of people if they set off a wild fire.

We've had fires and even though they were miles away, the smoke was thick enough we had to stay inside. And it was terrifying the possibility that the forest ground would be next.

Please consider this impacts everybody upstream from them. Also if the trains are here and ask the support of globalization and Free Trade Agreement allowing companies to outsource employment for living wage jobs to factories exporting goods through those ports to be built with substantial emissions and safety standards in places with unregulated death trap factories, subsistance wages and no emission regulation result in carbon emissions, water pollution and the like, huge increase in barge traffic, which is four times...

Response GP779-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

GP780, **Tinnerstet, Darryl**

Comment GP780-1

Westway & Imperium Expansion Proposals Draft EIS Comments Darryl Tinnerstet, McCleary WA Public Hearing Comments

RECEIVED oct 1 2015 For the record I have written, reviewed, and edited over 45 major EISs over a 26 year period. The largest, on a very complex project, was I believe about 300 pages. Had I turned out an 1800 page document, let alone two of them for basically the same project, my career would have been considerably shorter.

1. These two EISs should have been combined, along with the third one. WAC 197-11-060(3)(b) states "Proposals or parts of proposals that are related to each other closely enough to be, in effect, a single course of action shall be evaluated in the same environmental document." Both of these documents, despite supposedly different proponents, were prepared by the same consultants. Both involve crude oil storage and shipping facilities in a common area, and shipping by rail on the same tracks. Please explain in detail why they were not combined, along with the third project, into a single, concise, readable document. The fact that a third project follows these two is classic segmentation - spreading out similar impacts over separate documents to make them appear smaller. Please explain how this is not segmentation.

Response GP780-1

Refer to the Master Response for Connected or Similar Actions.

Comment GP780-2

2.These documents should have been made available in hard copy. Historically NEPA and, I believe, SEPA EIS documents have been circulated in printed form to potential commenters. Please explain why the proponents were not required to do so, at their and not Ecology's expense. I repeatedly requested, and was refused, printed copies from Ecology unless I was willing to pay $540 for a copy. Adequate review of technical documents of this scale is virtually impossible online or from CDs. There is no way to easily flip back and forth within one of them or between them that way. Some of us do not have state of the art computers and have a very difficult time compiling comments while simultaneously trying to read online.

Response GP780-2

Printed copies of the Draft EIS were available for review at the following locations: Washington State Department of Ecology, Lacey; City Hall, Hoquiam; Aberdeen Timberland Library, Aberdeen; Centralia Timberland Library, Centralia; Hoquiam Timberland Library, Hoquiam; Lacey Timberland

Library, Lacey; Olympia Timberland Library, Olympia; McCleary Timberland Library, McCleary; and Ocean Shores Public Library, Ocean Shores.

Comment GP780-3

3.WAC 197-11-425 states "The text of an EIS (WAC 197-11-430(3)) normally ranges from thirty to fifty pages and may be shorter. The EIS text shall not exceed seventy-five pages; except for proposals of unusual scope or complexity, where the EIS shall not exceed one hundred fifty pages. Appendices and background material shall be bound separately from the EIS if they exceed twenty-five pages..." Likewise the SEPA Handbook FAQs state "the text of an EIS shall not exceed 75 pages, except for proposals of unusual scope or complexity, which shall not exceed 150 pages [WAC 197-11-425(4)]. If appendices and background material exceed 25 pages and together the entire EIS would exceed 100 pages, they must be bound in a separate volume." Obviously the intent was for printed and bound copies to be circulated, albeit much smaller in size. WAC 197-11- 504 says nothing about providing electronic copies only. Can you point to specific Ecology guidelines which say that is no longer required? This should not be an FOIA Public Disclosure issue - these documents are specifically intended for public circulation and comment. Please explain how refusing to provide printed copies in accordance with state law, Ecology regulations, and common practice should not be viewed as an effort to stifle detailed comments. Of course the cost would be excessive, because the proponents were allowed to make the two documents 24 times the legal size.

Response GP780-3

The length of the Draft EIS reflects the amount and complexity of information deemed adequate for the full disclosure of impacts. Due to the size, other materials such as the *Summary* and fact sheets were prepared to convey impacts in a more condensed format. See response to previous comment regarding printed copies.

Comment GP780-4

4.As noted above, SEPA regulations limit the size of an EIS to 150 pages at most. Please explain why these documents were allowed to exceed that by 12 times each. Segmentation is a major issue with these J., not 2 projects. Issuing 2 EISs at once doubled the amount to be reviewed, and the repetitious format compounds the problem. I for one had 10 pages of comments before finally getting to sections that partially answered them. As you read each document you are given the impression that these are the only impacts -then you finally get to Cumulative Impacts in Chapter 6 and find some of the total impacts. Economics, Social Policy, and Cost-Benefit Analysis, in Chapter 7, is not even included in Cumulative Impacts. The result is 24 times as much to review in only twice the normal time, requiring the constant comparison of the two huge documents. Please explain how expecting review of 24 times more pages in only twice the normal time is reasonable, rather than an effort by the proponents to deter review and stifle comments.

Written comments will also be provided.

Response GP780-4

See Response to Comment GP780-3.

Pursuant to WAC 197-11-455, the lead agency for a SEPA proceeding shall provide 30 days for review of and comment on a Draft EIS. This may be extended by 15 days upon request. The co-lead

agencies issued an extended 60-day comment period that was then extended to 90 days based on public requests to provide additional time for review and comment.

GP781, **Tinnerstet, Darryl**

Comment GP781-1

Westway Expansion Project

Draft EIS Comments

Darryl Tinnerstet, McCleary WA

RECEIVED NOV 17 2015

General Comments

1.These two EISs should have been combined, along with the third one. WAC 197-11- 060(3)(b) states "Proposals or parts of proposals that are related to each other closely enough to be, in effect, a single course of action shall be evaluated in the same environmental document." Both of these documents, despite supposedly different proponents, were prepared by the same consultants. Both involve crude oil storage and shipping facilities in a common area, and shipping by rail on the same tracks. Please explain in detail why they were not combined, along with the third project, into a single, concise, readable document. The fact that a third project follows these two is classic segmentation - spreading out similar impacts over separate documents to make them appear smaller. Please explain how this is not segmentation. Please explain how producing 3800 pages of repetitive text, much of it meaningless boilerplate, was not an effort to prevent meaningful review.

Response GP781-1

Refer to the Master Response for Connected or Similar Actions.

Comment GP781-2

2.These documents should have been made available in hard copy. Historically NEPA and, I believe, SEPA EIS documents have been circulated in printed form to potential commenters. Please explain why the proponents were not required to do so, at their and not Ecology's expense. I repeatedly requested, and was refused, printed copies from Ecology unless I was willing to pay $540 for a copy. Adequate review of technical documents of this scale is virtually impossible online or from CDs. There is no way to easily flip back and forth within one of them or between them that way. Some of us do not have state of the art computers and have a very difficult time compiling comments while simultaneously trying to read online. I was, ultimately, able to obtain printed copies, but only because I knew how to work the system.

Response GP781-2

Printed copies of the Draft EIS were available for review at the following locations: Washington State Department of Ecology, Lacey; City Hall, Hoquiam; Aberdeen Timberland Library, Aberdeen; Centralia Timberland Library, Centralia; Hoquiam Timberland Library, Hoquiam; Lacey Timberland Library, Lacey; Olympia Timberland Library, Olympia; McCleary Timberland Library, McCleary; and Ocean Shores Public Library, Ocean Shores.

Comment GP781-3

3.WAC 197-11-425 states "The text of an EIS (WAC 197-11-430(3)) normally ranges from thirty to fifty pages and may be shorter. The EIS text shall not exceed seventy-five pages; except for proposals of unusual scope or complexity, where the EIS shall not exceed one hundred fifty pages. Appendices and background material shall be bound separately from the EIS if they exceed twenty-five pages..." Likewise the SEPA Handbook FAQs state "the text of an EIS shall not exceed 75 pages, except for proposals of unusual scope or complexity, which shall not exceed 150 pages [WAC 197-11-425(4)]. If appendices and background material exceed 25 pages and together the entire EIS would exceed 100 pages, they must be bound in a separate volume." Obviously the intent was for printed and bound copies to be circulated, albeit much smaller in size. WAC 197-11-504 says nothing about providing electronic copies only. Can you point to specific Ecology guidelines which say that is no longer required? This should not be an FOIA Public Disclosure issue - these documents are specifically intended for public circulation and comment. Please explain how refusing to provide printed copies in accordance with state law, Ecology regulations, and common practice should not be viewed as an effort to stifle detailed comments. Of course the cost would be excessive, because the proponents were allowed to make the two documents 24 times the legal size.

Response GP781-3

The length of the Draft EIS reflects the amount and complexity of information deemed adequate for the full disclosure of impacts. Due to the size, other materials such as the *Summary* and fact sheets were prepared to convey impacts in a more condensed format. See response to previous comment regarding printed copies.

Comment GP781-4

4.As noted above, SEPA regulations limit the size of an EIS to 150 pages at most. Please explain why these documents were allowed to exceed that by 12 times each. Segmentation is a major issue with these J, not 2 projects. Issuing 2 EISs at once doubled the amount to be reviewed, and the repetitious format compounds the problem. As you read each document you are given the impression that these are the only impacts -then after 561 pages you finally get to Cumulative Impacts in Chapter 6 and find some of the total impacts. Economics, Social Policy, and Cost-Benefit Analysis, in Chapter 7, are not even included in Cumulative Impacts. The result is 24 times as much to review in only twice the normal time, requiring the constant comparison of the two huge documents. Please explain how expecting review of 24 times more pages in only twice the normal time is reasonable, rather than an effort by the proponents to deter review and stifle comments.

Response GP781-4

See Response to Comment GP781-3.

Comment GP781-5

Westway Expansion Project

<u>Specific Comments</u>

1.Fact Sheet, Page 2, under "State" -Doesn't EFSEC have approval jurisdiction under RCW 80.50.020(12)(d)? They are not mentioned anywhere.

Response GP781-5

The Energy Facility Site Evaluation Council (EFSEC) determined that the proposed action did not fall under EFSEC jurisdiction. On February 12, 2015, EFSEC dismissed a petition filed by the Quinault Indian Nation requesting that EFSEC declare jurisdiction over the proposed action (Council Order No. 14-001).

Comment GP781-6

2.Fact Sheet, Page 6 -"Printed copies of the Draft EIS can be made available through the Washington State Department of Ecology for a fee." That fee has always in the past been no more than the mass printing costs of a reasonable size (150 page) document. As noted above, repeated requests to obtain a printed copy from Ecology were denied unless requested under the FOIA public disclosure process at a cost of $0.15/page - $270 per EIS! Please explain why this document, produced specifically for public comment, was not made readily available in a readable form besides electronically, which is unsuitable for many reviewers. RCW 197-11-440(2)(1) states the fact sheet must include the cost of the document, not "for a fee".

Response GP781-6

As stated above, the Draft EIS was made available for public review at local libraries or, as acknowledged by the commenter, for the cost of printing.

Comment GP781-7

3.S-1, Summary -Clearly disclose who the proponent of this project is - include parent companies, relationship if any to the Imperium proponent and rail carrier, railway ownership, etc. Make it clear who benefits from this project and all of its impacts. The Summary must state the Purpose and Need of the project (WAC 197-11-440(4)).

Response GP781-7

Final EIS Chapter 2, *Proposed Action and Alternatives*, reflects the addition of information directly below the project objective, specifying the purpose and need to which the proposal is responding.

Comment GP781-8

4.S-1, footnote -"were to could come from"?? Please explain.

Response GP781-8

As noted in the Master Response for Project Objectives and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant. Draft EIS Chapter 2, *Proposed Action and Alternatives*, describes the type of material and approximate volumes to be transported based on this information.

Comment GP781-9

5. S-2, Alternatives - SEPA requires the inclusion of alternatives to the proposed action (WAC 197-11-440(5)(a & b) -other than No Action, where are those alternatives presented?

Response GP781-9

Refer to the Master Response for Project Objective and Alternatives for an explanation of the alternatives evaluated in the Draft EIS.

Comment GP781-10

6.S-3, 4th par. -Actual unit train trips per day would be closer to 1.30. See later comments at Table 6-9. Under Significant Areas of Concern, 5th line -"hazards and costs related to potential oil spills..."- Just where are the costs of spills, fires, or explosions described? Not in Chapter 4.

Response GP781-10

As stated in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, existing train traffic along the PS&P rail line is between 3.0 and 3.1 trains per day on average. The PS&P rail line has a maximum capacity of 12 trains per day and is currently operating well below capacity. Operation of the proposed action at maximum throughput would add 458 unit train trips per year, or 1.25 trips per day on average, along the PS&P rail line.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-11

7.S-4, Significant Areas of Concern - Scoping comments clearly indicated the concern of cumulative impacts of all 3 oil terminal projects. Explain why analysis of the impacts of the Grays Harbor Rail Terminal Expansion Project was not included, and why this is not clearly segmentation.

Response GP781-11

Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of the incremental addition of impacts from the proposed action to impacts from past, present, and reasonably foreseeable future actions—including the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project.

Comment GP781-12

8.S-5, 2nd par. -These oil trains do not magically appear in Centralia. This document should expand its study area all the way to their source in North Dakota (or Montana or Canada), as all communities in between will suffer from the same increases in risk and exposure to hazardous materials.

Response GP781-12

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP781-13

9.S-5, Impacts -Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. The applicable laws prevent the targeting of low income or minority areas with high impact projects. Provide a thorough analysis of how this project, by routing these highly explosive trains through Grays Harbor instead of by current routes to refineries in Anacortes or elsewhere, is not targeting a depressed area. Explain how siting these terminals in Aberdeen/Hoquiam is not targeting a minority population.

Response GP781-13

Draft EIS Chapter 7, Section 7.2, *Social Policy*, includes an analysis of impacts on minority and low-income populations. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-14

10.S-6, Onsite Operations -"storage tanks could also become rupture (sic) and result in a leak of bulk liquids into the environment. The proposed action would be designed to meet local building codes and standards." Please document that local building codes are even remotely up to date regarding the latest predictions of severe magnitude earthquakes and accompanying tsunami waves, which in Chile 9/17/15 were from 15 to 36 feet in height (these projects are at water's edge, and the tanks will not be attached to their bases). "The applicant would be required to study the possibility of designing the proposed facilities to reduce the impacts of a large-scale tsunami event Mitigation would be required if it was deemed reasonable and feasible." Please document what will be done for mitigation, not just studying possibilities.

Response GP781-14

Prior to issuance of permits, a complete site-specific geotechnical investigation would be required to support engineering design decisions. Final EIS Chapter 3, Section 3.1.7.1, *Applicant Mitigation*, clarifies expected post-seismic and post-tsunami performance of the proposed storage tanks. Refer to the Master Response for Seismic Risk and Design Requirements.

Comment GP781-15

11.S-9, bottom, S-10 top -If vessel loading and transport operations are to be stopped for 2 weeks every year, what happens to the corresponding rail shipments? Are they suspended all the way back to N. Dakota/Canada? Unlikely as that would disrupt operations there. Are some 46 trains, with 5,520 tanks cars, just parked somewhere, waiting? That's 3.9 million barrels of crude, and the two

projects together will provide some 1.7 million barrels of storage tank volume. Where will that two-weeks-worth be stored?

Response GP781-15

Federal regulations prevent tank cars loaded with oil from being left unattended. Trains would not be loaded until they are ready to be shipped. Trains would not be shipped until an order is placed. Storage of crude oil before shipment would depend on the source of the oil. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment GP781-16

12.S-13, Land Use, Operations -"Implementation of the proposed action would require land use permits from the City of Hoquiam and the City of Aberdeen". The City of Aberdeen is on record opposing this project. Please address that resolution and its effect on the approval of this project.
13.S-17, Rail Traffic - See #6 above.

Response GP781-16

The resolutions and subsequent changes to the city codes would not affect the proposed action, because they were not approved prior to the start of the environmental review process for the proposed action.

Comment GP781-17

14.S-18, Rail and Vessel Transport -"this time would increase to up to 77 minutes" - Where does that number come from? Table 3.15-10 says 22 minutes per train; Table 3.15-11 says 1hour 30 minutes per day. And that is just with one Westway train.

Response GP781-17

Page S-29 of the Draft EIS *Summary* states that the amount of vehicle delay would increase from 13 minutes four times per week for the no-action alternative to 22 minutes for the proposed action and up to 77 minutes for the REG (formerly Imperium Terminal Services) Expansion Project. The delay time in the Final EIS *Summary* has been revised to 71 minutes to represent the 13 minutes of existing vehicle delay plus the 58 minutes of proposed action delay at the Port Industrial Road crossing.

Comment GP781-18

15.S-23, Risk of Fire or Explosion -Please address the known deficiencies related to the condition of the PS&P rail line, including studies and photos, both official and volunteered, which show the lack of maintenance, failing 119- to 126-year-old structures, and other hazards which will be acerbated by increased rail traffic. Please describe the recent derailments that occurred near Aberdeen - location, train speed, cause, repairs, and environmental impacts. Include an estimate of what those damages would have been had the derailment included oil tankers which ruptured. Also, address the likelihood of, and preventive measures and security that will be included to prevent vandals or terrorists from targeting the rail structures, rail lines, or storage facilities.

Response GP781-18

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Recent derailments along the PS&P are presented in Final EIS Section 4.5.1.1, *Risk of Spills for Existing Conditions and No-Action Alternative*. The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

Comment GP781-19

16.S-24, Figures S-4 & S-5 -Please explain how, under any circumstances, the levels of Risk and Potential Environmental Impact under the middle or lower spill scenarios are even remotely acceptable.

Response GP781-19

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment GP781-20

17.S-26 - Table S-3 needs to include under Human Health the significant loss of life demonstrated in other recent oil train accidents.

Response GP781-20

Final EIS Chapter 4, Section 4.7, *Human Health*, has been revised to more fully describe potential impacts on human health related to an incident. Final EIS *Summary* reflects updates as well.

Comment GP781-21

18.S-27, Air - This discussion needs to include the greenhouse gas emissions related to the 2 billion gallons of crude oil proposed to be transported through these facilities per year. As for "no flooding from sea level rise is predicted at the project site."-just how high above sea level are these terminals? Do not most recent studies claim that catastrophic sea level rise is imminent?

Response GP781-21

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. Final EIS Section 3.2 and Section 6.5.1.2 have been revised to include emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. Regarding flooding, Final EIS Section 6.5.1.2 and *Summary* clarify predictions of sea level change in the study area and potential for flooding at the project site. With sea level in the study area predicted to rise 1.57 feet by 2050, the project site would remain approximately 5 feet higher than the projected high tide and would not be subject to flooding even during extreme storm events.

Comment GP781-22

19.S-27, Noise and Vibration - Explain why the affected residents of Centralia are not included. What is the average estimated length in feet, miles, and number of cars for the 4.3 trains per day attributed to these projects compared to the existing 3.4 (1235/yr, Page 3.15-14) trains per day? Estimated weight? How does that compare to the current train size in total weight? Please explain how only 10 residences are affected when these 7.65 (not 7.25) trains pass daily through the length of Elma. Even slow speed noises are very disturbing.

Response GP781-22

Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*, provides a detailed analysis of noise and vibration related to the proposed action that would occur in the study area, including impacts of train noise in Centralia. Section 3.15, *Rail Traffic*, provides information on the length and number of cars of trains under existing conditions and with the proposed action. Train weight is not considered in the noise and vibration analysis; primary factors are horns, number of locomotives and cars, and length of train. The reference to 10 residences is unclear. Receptors located adjacent to several grade crossings in Elma would be exposed to severe and moderate impacts, as indicated in Table 3.7-6.

Comment GP781-23

20.S-28, Tribal Resources -Listed impacts are limited to those of normal operation. What about the impacts of spills, fires, collisions, derailments, leaks, etc.?

Response GP781-23

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, addresses the potential impacts on tribal resources that could result from an oil spill, fire, or explosion during terminal (onsite) operations or

rail and vessel transport. Because the consequences of an incident would vary based on the specific circumstances, the impacts on tribal resources are discussed in general terms. Final EIS Section 4.7 has been revised to further clarify the potential for impacts. For more information about the analysis of risks, refer to the Master Response for Environmental Health and Safety Analysis.

Comment GP781-24

21.S-28, Rail Traffic -Existing rail traffic is consistently understated throughout the document as "3/day" when in fact it is 1,235/yr or 3.4/day (p. 3.15-14). Address the documented lack of maintenance and failing structures on the PS&P line, and how a 125% increase in rail traffic will affect the risk of derailment and catastrophic failure.

Response GP781-24

Final EIS Chapter 3, Section 3.15, *Rail Traffic*, Table 3.15-4 and associated text have been updated to improve clarity. As explained in the table, some trains only travel a portion of the line. Therefore, the typical daily rail traffic is 3.0 trips between Centralia and Elma and 3.1 trips between Elma and Aberdeen. Regarding the comment to evaluate rail infrastructure, refer to Response to Comment GP781-18.

Comment GP781-25

22.S-28, Vehicle Traffic and Safety -"the chance of encountering a blocked grade crossing would remain relatively low." With 7.65 trains per day, on average that is one about every three hours. With crossing delays of up to 52 minutes at Olympic Gateway Plaza, the unobstructed crossing time span is therefore reduced to just over 2 hours. That assumes the 7.65 trains are evenly spaced over a 24 hour period. If they are less frequent at night, then the unobstructed crossing period becomes even shorter. Please justify how that would be considered "relatively low".

Response GP781-25

The reference to the 52-minute passing time is in Aberdeen and not between Centralia and Aberdeen. As described in Chapter 6, *Cumulative Impacts*, the approximate total vehicle delay in 2017 in a 24-hour period for grade crossings between west of Centralia and east of Aberdeen would vary from approximately 19 to 56 minutes daily, depending on the grade crossing, compared to 7 to 17 minutes daily under the no-action alternative. Therefore, the total daily blockage time at grade crossings due to the cumulative project trains would increase by approximately 12 to 39 minutes in a 24-hour period for all trains, or a blockage time increase of up to approximately 2.7%, which is qualitatively described as relatively low. Even though there would be an increase in total daily vehicle delay, an increase in train trips on the PS&P rail line would not substantially increase the average vehicle delay at most PS&P rail line grade crossings compared to the no-action alternative. This is because vehicle traffic along most of the PS&P rail line is relatively low and the chance of a substantial number of vehicles encountering a train would remain relatively low. In other words, most individual drivers would not likely notice a substantial change in delay at grade crossings.

Comment GP781-26

23.S-29, Vehicle Traffic and Safety -Please explain mitigation measures, for heart attack victims, childbirth, accidents, crimes or fires, which will be provided when trains will block all entrances and exits to Olympic Gateway Plaza (and other cut off sites) for up to 52 minutes at a time. Explain the

mitigation for emergencies at Home Depot, which will be cut off for up to 1hour 17 minutes and has no alternative access. Explain how ‘‘the applicant would ensure that sufficient emergency service equipment is available to local emergency service providers” will enable timely transport of those victims when all access is cut off for that long. Explain how grade crossings are now only blocked “four times per week” when directly above it is stated the current traffic is “3 trips per day” (actually 23.8 per week). Explain how the projects would increase that by “19 times per week” when above it is stated that the increase due to these projects is “4.25 trips per day” [29.75 per week]. Explain how increasing wait times from the current “13 minutes four times per week” to 15 times per week and 77 minutes is not a significant unmitigatable impact. Mitigation that may be offered by other future projects is pie-in the-sky and should not be included here. “[U]navoidable and significant adverse impacts on vehicle delays from trains blocking crossings in the Olympic Gateway Plaza and Port areas of Aberdeen” -what about the effect of 7.65 trains per day through Elma, Montesano, and Centralia? Lower traffic volumes do not mean that each person needing to cross is not affected in the same way -stopped is stopped, whether one vehicle or hundreds.

Response GP781-26

The purpose of the Draft EIS *Summary* is to provide a high-level description of potential impacts of the proposed action. Refer to Final EIS Chapters 3 through 6 for a detailed description of potential impacts under the proposed action.

The proposed mitigation measures for emergency response are provided in Final EIS *Summary*, Table S-1 and Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*.

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

As described in the text, the reference to 1 hour and 17 minutes is related to the REG (formerly Imperium Terminal Services) Expansion Project, and therefore is not an impact related to the proposed action. For additional information on how mitigation was identified, refer to the Master Response for Mitigation Framework.

Final EIS Chapter 3, Section 3.16.8, *Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?* clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).

The reference to times per week was revised to improve clarity in the Final EIS. Chapter 6, *Cumulative Impacts*, describes potential impacts along the PS&P rail line related to the cumuatlive projects.

Comment GP781-27

24.S-30, Vessel traffic -Since the predicted number of vessels to be berthed exceeds the capacity of Terminal 1, what is the likelihood that these projects will necessitate the expansion of terminals? Isn't that another undocumented cumulative impact of this project?

Response GP781-27

The proposed action does not include the construction of additional vessel berths. As noted in Draft EIS Chapter 6, Section 3.17.5.2, *Proposed Action, Operation, Berth Capacity*, the analysis assumed 100% tank barges for the cumulative projects, which results in a conservative estimate of the most days of berth occupancy.

Comment GP781-28

25.S-30, Environmental Health and Safety -In light of the known substandard condition of the PS&P rail line, and the reported 16+ major oil train derailments in North America in only the last 2 years, stating "The likelihood of a large spill or related fire or explosion is relatively low" is absurd. Please explain how that statement can possibly be justified, especially in light of the 10/13/15 LA Times article which lists 31 oil train derailments since 2013. Please list the number of gas stations, chemical plants, and other hazardous or explosive material sites that are within 114 mile of either side of the tracks throughout the corridor. All add to the risk with an explosive derailment. Also list the number of schools, apartment buildings, churches, nursing homes, large employers, etc. that are within 1/4 mile of each side of the tracks. . .

Response GP781-28

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP781-29

26.S-31, Economic Impacts on the City of Hoquiam -Why were economic impacts on Centralia, Elma, Montesano, and Aberdeen ignored?

Response GP781-29

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-30

27.S-31, Social Impacts, Operations -Please address the impacts of increased rail traffic and delays to the cities of Elma, Rochester, and Oakville, where every north/south street has a grade crossing of the tracks. Address the impacts to all of the at-grade intersections in Centralia. Address the impacts of nearly 54 trips per week on the struggling businesses at Olympic Gateway Plaza, where all 7 grade crossings would be affected at once leaving no other access. Address the impacts of 54 train trips per week closing the only access to State Highway 107 and points south at Montesano. And even more significantly, address the loss of property value and ability to sell to all of the homes and businesses adjacent to the entire rail corridor due to the risk and noise of 54 rail trips per week of highly explosive products.

Response GP781-30

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, and Chapter 6, Section 6.5.5, *Vehicle Traffic and Safety*, address potential impacts on vehicle delay at grade crossing in the study area related to the proposed action and cumulative projects, respectively. Draft EIS Chapter 7, Section 7.3, Cost-Benefit Analysis, provides an analysis of the costs and benefits of the proposed action, relevant to the City of Hoquiam. Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, describes the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-31

28.S-32, Table S-4, Costs -Why is there such a wide range of costs? Explain who is liable for the increased costs shown. If not the proponents, why not? Why should the community bear the costs of delays, accidents, and training for a private project? Will they be required to maintain liability insurance sufficient to offset major claims? Despite the title of this table "Benefits and Cost of the Proposed Action to the City of Hoquiam" please clarify that the benefits shown are to the City, but all of the costs shown are borne by the affected individuals. Cost of Fire Department training should be estimated, and clarified that it will be the responsibility of the proponents.

Response GP781-31

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-32

29.S-33, Permits, City - The City of Aberdeen is on record opposing these projects. Please address that resolution and its effect on the permit approval for this project.

Response GP781-32

The resolutions and subsequent changes to the city codes would not affect the proposed action, because they were not approved prior to the start of the environmental review process for the proposed action.

Comment GP781-33

30.S-34, Tribal Resources -Impacts shown are only related to vessel traffic. Explain in detail the impacts related to potential spills, fires, accidents etc. and how they would affect tribal resources for generations.

Response GP781-33

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, addresses the potential impacts on tribal resources that could result from an oil spill, fire, or explosion during terminal (onsite) operations or rail and vessel transport. Because the consequences of an incident would vary based on the specific circumstances, the impacts on tribal resources are discussed in general terms. Final EIS Section 4.7 has been revised to further clarify the potential for impacts. For more information about the analysis of risks, refer to the Master Response for Environmental Health and Safety Analysis.

Comment GP781-34

31.S-34, Vehicle Traffic and Safety -Itis more than just Aberdeen that will be significantly affected. Please address and include the unmitigated impacts of 7.65 slow moving, 1.25- mile-long, trains per day on the grade crossings in Centralia and Elma, and even in Montesano.

Response GP781-34

Draft EIS Chapter 6, Section 6.5.5, *Vehicle Traffic and Safety*, describes vehicle delay in the study area from rail activity related to the cumulative projects.

Comment GP781-35

32.S-34, Environmental Health and Safety -Please add the statement from Appendix M, Page 7-4 which says the overall chance of a rail train accident is "once in 1.7 years". Please justify the statement that the likelihood of a spill or explosion is low, in light of the documented substandard condition of the PS&P rail line, its failing 119- to 126-year-old structures, its recent derailments, and the reported 16+ major oil train derailments and barge founderings in North America in only the last 2 years.

Response GP781-35

The reference in the comment to an incident occurring once in 1.7 years is for the no-action alternative and as noted in Appendix M, *Risk Assessment Technical Report*, does not represent the likelihood that a spill would occur but rather the chance than any incident might occur regardless of the potential for a release. Similar estimates for rail and vessel transport related to the proposed action are given on Draft EIS pages 4-8 and 5-6, respectively. These numbers represent the incremental chance of any incident associated with the proposed action. Similarly, they do not represent the equivalent chance of a spill. The combined risks of a spill are not presented in the Draft EIS for the reasons discussed in the Master Response for Risk Assessment Methods.

Comment GP781-36

33.S-37, 3.1 Earth, Risk of Rupture in a Tsunami -Recent studies strongly indicate that western Washington is overdue for a major destructive earthquake. The quake in Chile 9/17/15 generated waves from 15 to 36 feet in height. Please explain in detail the methods to be used to protect over 72 million gallons of hazardous and highly explosive products from waves of this magnitude, at facilities that are basically at sea level, and with tanks that are not anchored to their bases. "Will conduct a study" does not guarantee that anything will be done.

Response GP781-36

The site-specific tsunami risk analysis in Draft EIS Appendix C, *Tsunami Impact Modeling and Analysis,* describes assumptions regarding tide levels during a tsunami. Refer to the Master Response for Seismic Risk and Design Requirements for a description of the earthquake source model and hydrodynamic modeling method used in the site-specific tsunami analysis conducted for the project site and presented in Draft EIS Appendix C. The master response also provides an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events and for more information about the iterative, ongoing risk assessment and design processes associated with a project commensurate with its stage in development. Final EIS Section 3.1.8, *Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?* acknowledges that a large-scale tsunami would cause unavoidable and significant adverse impacts if the facility was not constructed to withstand it.

Comment GP781-37

34.S-37, 3.2 Air - This section only addresses operation impacts of equipment. Please address the greenhouse gas impacts related to the 2 billion gallons per year of crude oil proposed to be transported through these facilities.

Response GP781-37

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. Final EIS Section 3.2 and Section 6.5.1.2 have been revised to include emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment GP781-38

35.S-39, 3.4 Plants/3.5 Animals -This mitigation only addresses impacts of ballast water discharges. Include mitigation for all spills, leaks, and explosions throughout the entire corridor, including in remote areas where support vehicle access is very limited. The last column should indicate "Yes" for significant adverse impacts.

Response GP781-38

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation,* addresses the potential impacts from construction and routine operations. Draft EIS Chapter 4, *Environmental Health and Safety*, addresses the potential for increased risk of oil spills, fires, and explosions. Final EIS Chapters 3 and 4 have been revised to clarify that the mitigation proposed in Chapter 4 would also help to reduce the potential impacts on the resources identified in Chapter 3, including plants and animals.

Comment GP781-39

36.S-39, 3.5 Animals - See #11above concerning the 2 week halt of operations.

Response GP781-39

Refer to Response to Comment GP781-15.

Comment GP781-40

37.S-40, 3.7 Noise and Vibration -Please explain how the only viable mitigation for the noise and vibration of 7.65 1.25-mile-long trains per day is to trade off the increased risk of vehicle crossing accidents for reduced use of locomotive horn soundings.

Response GP781-40

Implementation of a quiet zone is subject to approval by the Federal Railroad Administration and includes measures to maintain the level of safety while reducing noise.

Comment GP781-41

38.S-40, 3.10 Recreation -"could result temporarily disrupt access"?? In addition to operational impacts, this section should also address the impacts of leaks, spills, and explosions to recreational resources and facilities.

Response GP781-41

Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses potential impacts from construction and routine operation of the proposed action. Increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) with the potential to result in the release of crude oil are addressed in Chapter 4, *Environmental Health and Safety*. Section 4.7, *Impacts on Resources*, describes the general types of impacts that could occur as a result of an oil spill, fire, or explosion, including impacts on recreation.

Comment GP781-42

39.S-41, 3.11Cultural Resources - Should include the potential for impacts to historic resources including the Breakwater Seafoods building and possibly historic RJR structures due to derailments, leaks, or explosions?

Response GP781-42

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms, including impacts on cultural resources.

Comment GP781-43

40.S-42, 3.12 Tribal Resources -The mitigation intended needs to address more than just tribal fishing. All of their cultural resources, traditions, and history are at risk.

Response GP781-43

Draft EIS Chapter 3, Section 3.12.7.1, *Applicant Mitigation,* proposes measures to reduce potential impacts on tribal fishing. Mitigation to reduce the likelihood of a spill reaching the environment and the potential impacts of an incident, including impacts on tribal resources, are presented in Draft EIS Chapter 4, *Environmental Health and Safety*, Sections 4.4.3, 4.5.3, and 4.6.3. Final EIS Chapter 4 reflects additional proposed mitigation measures.

Comment GP781-44

41.S-43, 3.14 Hazardous Materials -Incredibly, this section only addresses the impacts of construction. The risks due to leaks, spills, and explosions to humans, wildlife, plant life, and the general economy and well-being are immense, and must be included. Showing “No” in the last column under significant adverse impacts is absurd and must be changed to “Yes”.

Response GP781-44

As noted in the Draft EIS, the potential for increased risk of oil spills, fires, and explosions are addressed in Chapter 4, *Environmental Health and Safety.*

Comment GP781-45

42.S-45, 3.16 Vehicle Traffic and Safety -All mitigation shown is for Aberdeen and Hoquiam. Please show the mitigation planned for the 125% increase in rail traffic at crossings in Elma, Montesano, Rochester, Oakville, Centralia, and all points between. Include analysis of how small communities are expected to deal with increased costs due to this private project. The last column should indicate "Yes" for significant adverse impacts.

Response GP781-45

Final EIS Chapter 3, Section 3.16.8, *Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?* clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-46

43.S-51, 4.5 Environmental Health Risks, Rail Transport -The need for upgrading the 119- to 126-year old PS&P facilities needs to be included. The acting administrator of the FRA is on record as stating that the newer tank cars are only marginally improved over the old DOT-1 11cars, and will not survive a derailment over 16-18 MPH. Therefore, this project must include restricting rail speeds to below that speed. Please indicate if that has been included, and if not, why.

Response GP781-46

As stated in Draft EIS Chapter 3, Section 3.15.4.2, *PS&P Rail Line Track Conditions and Physical Characteristics*, PS&P is required to adhere to the applicable speed limits set by the Federal Railroad Administration.

Comment GP781-47

44.S-52, 4.5 Environmental Health Risks, Rail Transport -Please detail how these plans would have helped reduce the damage and loss of life at Lac-Megantic and the other 15+ sites of major derailments, spills, and leaks within the last two years in North America.

Response GP781-47

The purpose of the EIS is to consider the environmental impacts of the proposed action. Refer to the Master Response for Purpose and Focus of the EIS for additional information about the scope of the EIS.

Comment GP781-48

45.S-58 -Why was section 4.7, with its significant impacts, left out of the summary table?

Response GP781-48

Significant unavoidable and adverse impacts are discussed in the EIS in terms of the potential for impacts related to terminal operations, rail transport, and vessel transport, and are presented in Sections 4.4, 4.5, and 4.6, respectively. The mitigation measures identified in Table S-1 address three types of impact for each mode of operation: the potential for an incident to occur, the potential for environmental damage to occur, and the potential to exceed local emergency response capabilities. All the mitigation measures identified in these sections would help to reduce the potential impacts related to increased risk of an oil spill, fire, or explosion, including the potential for impacts described in Section 4.7 and any impacts that might affect the resources described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Comment GP781-49

46.S-58, 6.5.1 Air - This mitigation is only for operation. It needs to also address the greenhouse gas emissions related to the 2 billion gallons of crude oil proposed to be transported through these facilities every year.

Response GP781-49

Refer to the Master Response for Mitigation Framework for a description of the development of mitigation.

Comment GP781-50

47.S-60, 6.5.2 Noise and Vibration - Please explain how the only viable mitigation for the noise and vibration of 7.65 1.25-mile-long trains per day is to trade off the increased risk of vehicle crossing accidents for reduced use of locomotive horn soundings.

Response GP781-50

Implementation of a quiet zone is subject to approval by the Federal Railroad Administration and includes measures to maintain the level of safety while reducing noise.

Comment GP781-51

48.S-61, 6.5.3 Tribal Resources - The mitigation intended needs to address more than just tribal fishing. All of their cultural resources, traditions, and history are at risk.

Response GP781-51

Refer to Response to Comment 781-43. Mitigation proposed in Chapters 3 and 4 would also reduce cumulative impacts.

Comment GP781-52

49.S-61, 6.5.5 Vehicle Traffic and Safety - All mitigation shown is for Aberdeen and Hoquiam. Please show the mitigation planned for the 125% increase in rail traffic at crossings in Elma, Montesano, Rochester, Oakville, Centralia, and all points between. Include analysis of how small communities are expected to deal with increased costs due to this private project.

Response GP781-52

Refer to Response to Comment GP781-45. Mitigation proposed in Chapter 3, Section 3.16 would also reduce cumulative impacts.

Comment GP781-53

50.S-63, 6.5.7 Environmental Health and Safety -Incredibly, this mitigation only applies to vessel-related impacts. Please show mitigation planned for the impacts to humans, wildlife, plant life, and the general economy and well-being due to leaks, spills, and explosions.

Response GP781-53

Exclusion of proposed mitigation to reduce risk related to onsite and rail operation from the Draft EIS *Summary* was unintentional. The Final EIS *Summary* has been streamlined to reduce repetition. Mitigation proposed in Chapter 4 would also reduce cumulative impacts.

Comment GP781-54

51.S-66, Economics -Liaisons and reports will do nothing to mitigate the real and potential economic impacts of increased rail traffic, depressed property values, inability to sell adjacent properties, loss of access at grade crossings, etc. These issues need to be addressed, along with mitigation, if any, for the potential losses related to leaks, spills, and catastrophic explosions and fires. Had these impacts been fully examined, the last column should have been "Yes".

Response GP781-54

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-55

52.Contents, Page xxi - Why was US 2 included? Do the writers know that US 2 is almost 200 miles from this project?

Response GP781-55

The typo has been corrected in the Final EIS to specify US 12.

Comment GP781-56

53.Section 1.1 - Since this is a private undertaking, the full identity of the proponent should be disclosed, including any parent companies, relationship with the Imperium proponents, PS&P ownership, etc. This is necessary to clarify just who is profiting from projects where the local citizens only get the impacts, not any benefits.

Response GP781-56

Draft EIS Chapter 2, *Proposed Action and Alternatives*, acknowledges that PS&P is owned and operated by Genesee and Wyoming, Inc. Final EIS Chapter 2 reflects additional information about Westway Terminal Company LLC incorporation and ownership.

Comment GP781-57

54.Section 1.3 -Chapter 2, Proposed Action and Alternative -Where are alternatives (plural) to the proposed action discussed? No where, but they should be (WAC 197-11- 440(5)(a & b)).

Response GP781-57

Refer to the Master Response for Project Objective and Alternatives for an explanation of the alternatives evaluated in the Draft EIS.

Comment GP781-58

Under Chapter 3 - Economic impacts, from depressed property values, inability to sell adjacent properties, the effect of loss of access on businesses, noise etc., as well as the potentially extreme losses due to spills, leaks, and explosions, need to be included.

Response GP781-58

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns*, reflects additional information on the economic and social costs of oil spills. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-59

55.Chapter 2, Proposed Action and Alternative -Again, where are alternatives (plural) discussed? Other locations? Shipping via trucks? Directly to the refineries?

Response GP781-59

Refer to the Master Response for Project Objective and Alternatives for an explanation of the alternatives evaluated in the Draft EIS.

Comment GP781-60

Proposals need to be defined in ways that encourage consideration of alternatives, not preferred solutions. Where is the Purpose and Need stated?

Response GP781-60

Final EIS Chapter 2, *Proposed Action and Alternatives*, reflects the addition of information directly below the project objective, specifying the purpose and need to which the proposal is responding.

Comment GP781-61

Is EFSEC certification required (RCW 80.50.020(12)(d))?

Response GP781-61

The Energy Facility Site Evaluation Council (EFSEC) determined that the proposed action did not fall under EFSEC jurisdiction. On February 12, 2015, EFSEC dismissed a petition filed by the Quinault Indian Nation requesting that EFSEC declare jurisdiction over the proposed action (Council Order No. 14-001).

Comment GP781-62

56.Section 2.1.1 -These same loaded trains come all the way from North Dakota, Montana, and Canada. Please explain why the logical eastern terminus is Centralia. "No changes to the PS&P rail line are proposed as part of the proposed action."

Response GP781-62

Refer to the Master Response for Geographic Scope of the EIS for an explanation of the scope of analysis in Chapter 5, *Extended Rail and Vessel Transport*.

Comment GP781-63

Please explain how a rail line with 119- to 126-year-old structures and documented poor maintenance can possibly hold up to this magnitude of increased traffic, which it was never designed to accommodate. Explain why upgrade of the line is not included in this project, but the impacts along it are.

Response GP781-63

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP781-64

57.Section 2.1.2.1 -What is the elevation of the facility compared to the adjacent water? What is the height of the existing tanks?

Response GP781-64

Draft EIS Chapter 3, Section 3.1.4.1, *Geology and Soil Conditions*, identifies the project site elevation. Final EIS Section 3.1.4.1 has been updated to state more precisely that the project site has an average elevation of approximately 11 feet above mean sea level. Chapter 2, Section 2.1.2.1, *Existing*

Facilities, describes the existing storage tanks. The Final EIS reflects the addition of the height (40 feet) and diameter (120 feet) of the existing tanks.

Comment GP781-65

58.Section 2.1.2.2 -If 36 million gallons of methanol is received and 33.3 million gallons is shipped out, what happens to the other 2.7 million gallons?

Response GP781-65

An initial volume is pumped into each of the dry tanks upon the intiation of operations and that volume must be retained to maintain the internal floating roofs. Therefore, this volume cannot be shipped out and represents the difference in received and shipped methanol.

Comment GP781-66

59.Section 2.1.3.2, Onsite operations -Why is this project even necessary? Why is the crude oil not transported directly to the refineries? Why is it not refined nearer to the source?

Response GP781-66

As a private undertaking, the applicant determines the objectives of the proposal. The purpose of the SEPA review is to evaluate the potential impacts associated with the underlying action, which in this case, is the potential issuance or denial of the land use permit by the City of Hoquiam. Refer to the Master Response for the Purpose and Focus of the EIS.

Comment GP781-67

"[C]rude oil would be unloaded into a central collection area and then pumped to the storage tanks." What is this central collection area? Where is it described in detail? What are its safety features?

Response GP781-67

The containment area is described in Draft EIS Chapter 2, Section 2.1.3.1, *Proposed Facilities, Storage Tanks*. Detailed designs would be developed during the project's engineering and design phase.

Comment GP781-68

Under Rail -"it could come... from oil sands from Alberta, Canada." -Why don't the proponents know where their product is coming from, or going? The source makes a huge difference when discussing ha7.ardous impacts, production impacts, train routes, etc. Also, see #6 above.

Response GP781-68

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for more information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Comment GP781-69

60.Section 2.1.4.1 -Please explain how failure to attach the tanks to the concrete is reasonable in light of seismic and tsunami events that are predicted, especially with tanks that may be only partially filled.

Response GP781-69

The applicant's current designs assume that tanks would sit on top of the foundation without mechanical attachment to the slab and that the weight of the tanks themselves would hold them in place. However, final design and construction would be based on detailed geotechnical analysis and civil design in accordance with current building and fire codes and associated standards and requirements.

Comment GP781-70

61.Section 3.0.1 -The list of impact areas studied needs to include Economics. This chapter also needs to include a qualitative analysis of crude oil extraction and refining impacts. That would mean that the geographic locations of the sources and refineries would need to be clearly defined, which has not been done.

Response GP781-70

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and for information on the likely destinations of crude oil shipped through the proposed facilities.

Comment GP781-71

62.Section 3.1.2 -Do the local building codes adopted in 2012 reflect the 2014-2015 predictions of overdue catastrophic seismic events?

Response GP781-71

Refer to the Master Response for Seismic Risk and Design Requirements.

Comment GP781-72

63.Page 3.1-13, 2nd par. -The list of streams should include the Wishkah River, one of the larger that is crossed.

Response GP781-72

Final EIS Chapter 3, Section3.1.4.3, *Geologic Hazards*, reflects the addition of the Wishkah River to the list of major stream crossings of the PS&P rail line.

Comment GP781-73

64.Page 3.1-15 -Recent articles about predicted major seismic events and associated tsunamis indicate that the risk is far greater in both timing and impact than earlier predictions. Experts now

claim that the west coast is overdue for a major 8.0 or greater quake ("We are 300 years into a 240 year cycle."). The methodology used here for the tsunami predictions appears to date from 2011and earlier. Please address those current concerns in light of the 2014-2015 predictions.

Response GP781-73

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

Comment GP781-74

65.Page 3.1-20, 1st and 2nd pars. -There is no Section 3.1.7.2 as referenced. Also, under "Landslides and Slope Instability" it says the railroad "is separated from the adjacent hillslope by US 12, a two-lane highway that is between 40 to 70 feet wide and often divided by a concrete barrier, as well as a vegetated median of varying width." The section of US 12just east of Aberdeen is 4-lane with a barrier. The only part of US 12 with a vegetated median is from Montesano to Elma, none of which separates the RIR from any slopes. From Elma SE to Centralia US 12 is two-lane with no median or barrier.

Response GP781-74

The reference to the applicant mitigation section has been corrected in Final EIS Chapter 3, Section 3.1, *Earth*, and the description of US12 has been updated.

Comment GP781-75

66.Page 3.1-21 -It is well known that the rail line east of Aberdeen to near Montesano is on unfirm soils, to the point that existing train speeds have been reduced The 125% increase in rail traffic, increased train length and weight, and presence of highly volatile crude oil would dramatically increase the risk due to seismic incidents. Please address this increased risk correctly.

Response GP781-75

As noted in Draft EIS Chapter 3, Section 3.1, *Earth*, the proposed action would not change the likelihood of a seismic event; however, there is the potential for increased risk of exposure of people and property to harm if a seismic event occurred during rail transport. The increased risk of oil spills, fires, and explosions during rail transport is addressed in Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*. As noted in the Master Response for Risk Assessment Methods, the risk assessment does not consider any single causal event but rather determines the likelihood of each release scenario to occur related to the proposed action and generally described the potential impacts in Section 4.7, *Impacts on Resources*. As noted in Chapter 4, *Environmental Health and Safety*, no measures would eliminate the risk and depending on the specific circumstances of each incident, there is a potential for significant environmental impacts.

Comment GP781-76

67.Page 3.1-22, 4th par. -A 55% increase in vessel trips due to just this one of 3 projects is more than just "a small, incremental increase". Please correct that statement or justify it.

Response GP781-76

The statement referenced by the commenter is specific to the potential for impacts associated with wake from the addition of tank vessels under the proposed action compared to the no-action alternative.

Comment GP781-77

68.Page 3.1-23, top par. -Again, a 55% increase with just one of the 3 projects proposed is more than a "slight" increase. Please correct that statement or justify it.

Response GP781-77

Comment acknowledged.

Comment GP781-78

69.Section 3.1.6, Permits -The City of Aberdeen is on record as being against these projects. Considering that, what is the likelihood they will approve the ones listed here?

Response GP781-78

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP781-79

70.Page 3.1-24, "International Building Code 2012" -Please note that this building code pre-dates the recent studies predicting major seismic events for this area.

Response GP781-79

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP781-80

71.Section 3.1.8 -Please address reports publicized in 2014 and 2015 that show the likelihood of a major seismic event is high, not low -"300 years into a 240-year cycle".

Response GP781-80

Refer to the Master Response for Earthquake Probabilities.

Comment GP781-81

72.Section 3.2.3.2 -The impact analysis should also address the greenhouse gas emissions related to the 2 billion gallons of crude oil proposed to be transported through these facilities every year.
73.Page 3.2-7, Parks -Need to include Vessey and Fleet Parks in Montesano.

Response GP781-81

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. Final EIS Section 3.2 and Section 6.5.1.2 have been revised to include emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Final EIS Section 3.2, *Air*, Table 3.2-4 has been revised to add John W. Vessey Memorial Ball Park and Fleet Park.

Comment GP781-82

74.Section 3.2.5.2 -Need to include odors as well as toxic pollutants (WAC 197-11- 444(b)(ii)).

Response GP781-82

Final EIS Chapter 3, Section 3.2, *Air*, reflects the addition of a discussion of potential impacts related to odor. The only compound with sufficient emissions to have the potential to have a perceptible odor is hydrogen sulfide. The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, are expected to reduce emissions of air pollutants, including hydrogen sulfide, to below the odor threshold for the most sensitive individual.

Comment GP781-83

75.Page 3.2-12, Rail - See #6 above.

Response GP781-83

Refer to Response to Comment GP781-10.

Comment GP781-84

76.Page 3.2-13, top -This analysis assumes train traffic is moving as scheduled. What is the history of unplanned stoppages along this corridor? What is the average duration? What is the likelihood that unplanned stoppages will increase with a 125% increase in rail traffic?

Response GP781-84

Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, addresses rail traffic along the PS&P rail line.

Comment GP781-85

77.Page 3.2-14, 1st full paragraph -The second sentence makes no sense at all. Please explain this statement.

Response GP781-85

The sentence describes Washington State Department of Ecology's thresholds for toxic air pollutants, referred to as small quantity emission rates and acceptable source impact levels (ASILs).

Comment GP781-86

78.Page 3.2-15, bottom par. -Comparing the increase in rail traffic to a 3.5% increase in truck traffic is deceptive at best. This section needs to acknowledge and address the 125% increase in rail traffic

Response GP781-86

The comparison is intended to provide context for understanding the amount of diesel particulate matter emissions that would result from rail transport related to the proposed action in the study area.

Comment GP781-87

79.Page 3.2-19 -The mandate is to reduce, not increase GHG. How can this project possibly be acceptable when it increases GHG emissions?

Response GP781-87

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP781-88

80.Page 3.2-20 - "there is reason to believe that much of the crude oil being transported to the new facility would replace crude oil that was previously transported by tank ship. The Washington 2014 Marine & Rail Oil Transportation Study stated the following (Washington State Department of Ecology 2014b). ...historically, 90% of crude oil bound for Washington's refineries was delivered here by tank ship from Alaska or from other international sources of oil. Today pipeline and rail delivery of crude oil make up more than 30% of our imports, while vessel delivery is reduced to less than 70%. Crude oil transportation is rapidly shifting to delivery by rail and pipeline." The implication of this statement is that vessel traffic will be reduced. Please clarify that, since all of this crude is destined to leave the terminal by ship, it will in fact increase vessel traffic and associated impacts.

Response GP781-88

The quoted text is related to the discussion of greenhouse gas emissions attributable to the proposed action. As stated throughout the Draft EIS, operation of the proposed action at maximum throughput would add 238 tank vessel trips to projected vessel trips in the study area.

Comment GP781-89

81.Page 3.2-20, bottom, continued to p. 3.2-21 -"The majority of the crude oil handled at the facility is expected to be Bakken crude oil, which, because it can only be transported to U.S. refineries, would replace oil currently in U.S. refineries. Because U.S. refineries capacities are limited by law, existing refineries would not increase their capacity ..." Please explain why this Bakken crude is not

being shipped directly to the existing refineries. If it is simply replacing crude already refined there, then it should not increase traffic on existing rail lines serving those refineries. Please explain why this statement does not completely negate the need for these facilities.

82.Page 3.2-21, 2nd full paragraph -The fact that this project represents a "very small segment of the crude oil market in the United States" is irrelevant The impacts associated with these 3 projects are being brought into an area where they do not presently exist. Please explain how this is not a violation of Environmental Justice by targeting a lower income and minority population.

Response GP781-89

As stated in Draft EIS Chapter 3, Section 3.2.5.2, *Proposed Action*, *Operation, Greenhouse Gas Emissions,* much of the crude oil that would be transported to the new facility would likely replace crude oil previously transported by tank ship.

The quoted statement is intended to provide context for the amount of crude oil that would move through the proposed facilities. Draft EIS Chapter 7, Section 7.2, *Social Policy*, presents the analysis of potential disproportionate impacts on low-income and minority populations.

Comment GP781-90

83.Page 3.2-22, bottom bullets, and next page, top bullet -Does the applicant have the authority or ability to make these changes to PS&P equipment? Unlikely.

Response GP781-90

Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, have been updated, based on information received from PS&P, to reflect that the types of locomotives described in the cited measure would be used to transport trains related to the proposed action.

Comment GP781-91

84.Figure 3.3-2 -The scale of this map is too small to show any of the wetlands noted on page 3.3-16.

Response GP781-91

The freshwater forested, scrub-shrub, and emergent wetlands are collectively shown as the palustrine wetlands and the open water areas are collectively shown as riverine and lacustrine waters on Draft EIS Figure 3.3-2. Final EIS Chapter 3, Section 3.3.4.3, *Wetlands,* has been revised to clarify this.

Comment GP781-92

85.Page 3.3-16, 2nd par. -Where are these wetlands shown? Figure 3.3-2 is too small scale to show them.

Response GP781-92

The freshwater forested, scrub-shrub, and emergent wetlands are collectively shown as the palustrine wetlands and the open water areas are collectively shown as riverine and lacustrine

waters on Draft EIS Figure 3.3-2. Final EIS Chapter 3, Section 3.3.4.3, *Wetlands*,has been revised to clarify this.

Comment GP781-93

86.Section 3.3.4.4 -WAC197-11-444(c)(iii) requires the analysis of flood impacts, which is not necessarily the same as Floodplains.

Response GP781-93

As described in Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, the project site is not subject to flooding even during extreme storm events. Draft EIS Chapter 4, Section 4.3.2, *What environmental factors contribute to potential impacts from an incident?* acknowledges flooding as an environmental factor that can contribute to potential impacts from an oil spill incident. Section 4.5.2.1, *Oil Spills,* addresses the movement of spilled oil in the Chehalis River during flood conditions; this information was incorporated into the oil spill model (Appendix N, *Oil Spill Modeling*).

Comment GP781-94

87.Page 3.3-17, 2nd par. -Where are these floodplains shown?

Response GP781-94

The floodplains are shown in Appendix E, *FEMA Flood Insurance Rate Maps*.

Comment GP781-95

88. Page 3.3-23 bottom, 3.4-15, 3.5-21, 3.7-14, 3.10-12, 3.12-19, 3.16-15, Rail -Please note that additional rail traffic is 1.3, not one, and current rail traffic is 3.4, not 3. Please correct this throughout rather than consistently downplaying these numbers.

Response GP781-95

References to trip numbers throughout the Draft EIS are rounded for comparison and consistency. As shown in Draft EIS Table 3.15-4, under existing conditions there are an average of 3.1 rail trips per day west of Elma and 3.0 trips per day east of Elma.

Comment GP781-96

89.Page 3.3-27, Section 3.3.7 -This sentence makes no sense.

Response GP781-96

The sentence is missing the word “describes” between the words “section” and “the”. Final EIS Chapter 3, Section 3.3.7 *What mitigation measures would reduce impacts on water?* has been revised.

Comment GP781-97

90.Page 3.4-18, Section 3.4.6 -The entire site will be paved. Just where are 105 trees to be planted - on someone else’s property?

Response GP781-97

If the proposed action is approved, the tree planting plan and planting location would be determined at a later time when the applicant submits the development permit applications to the City of Hoquiam, which would ensure compliance with Hoquiam Municipal Code 10.05.065.

Comment GP781-98

91.Page 3.5-18, bottom par., continuing to next page -Same comment as above -how will this planting be accomplished "outside of the project site"?

Response GP781-98

The tree-planting plan and planting location would be determined when the applicant submits their development permit applications to the City of Hoquiam, which would ensure compliance with Hoquiam Municipal Code 10.05.065.

Comment GP781-99

92.Section 3.5.7.1 - See # 11above, concerning halting operations for 2 weeks.

Response GP781-99

Refer to Response to Comment GP781-15.

Comment GP781-100

93.Page 3.7-7, Figure 3.7-2 -This document needs a detailed map of all R/R crossings, particularly in Centralia and Elma. There is no way to evaluate those impacts without one.

Response GP781-100

Draft EIS Chapter 3, Section 3.7, *Noise and Vibration*, Figure 3.7-2 depicts locations of grade crossings along the PSP&P rail line. Table 3.7-6, *Estimated Counts of Moderate and Severe Noise Impacts on the PS&P Rail Line—Proposed Action*, identifies the grade-crossing street names, locations, and numbers where severe and moderate impacts are predicted to result from the proposed action.

Comment GP781-101

94.Page 3.9-6, Figure 3.9-1 -Do the numbers on this figure correspond to the photos that follow? If so they should be so noted.

Response GP781-101

Draft EIS Chapter 3, Section 3.9, *Aesthetics, Light, and Glare*, Figures 3.9-2 through Figure 3.9-17 correspond to the representative photo location numbers provided in Figure 3.9-1. Final EIS Figures 3.9-2 through 3.9-17 captions have been revised to identify the representative photo locations.

Comment GP781-102

95.Pages 3.9-8 to 3.9-16 -These photos would be much more useful with the proposed tanks shown on them. As is, they really show nothing.

Response GP781-102

Draft EIS Chapter 3, Section 3.9, *Aesthetics, Light, and Glare*, Figure 3.9-2 through Figure 3.9-17 are meant to show the existing visual conditions in the project area. The figures demonstrate that the visual character of the project area consists of a mix of industrial, commercial, residential, and recreational uses. To see a schematic of the proposed features, refer to Draft EIS Figure 2-2, *Project Site*.

Comment GP781-103

96.Page 3.9-20, 2nd and 4th par. -There is no Section 3.9.7.2 as referenced. 97.Page 3.9-21, Rail and Vessel, 2nd par. -Current train traffic is 3.38 trains per day and 1,235 per year. Why is it that the current and proposed train traffic is always stated lower than it really is?

Response GP781-103

The reference to the section has been corrected in the Final EIS. The estimate of existing rail trips is based on data from a typical month, which indicates 3.1 trips west of Elma and 3.0 east of Elma. Based on these daily trips estimates, there are approximately 1,100 trips annually. References to the annual estimate have been corrected in the Final EIS.

Comment GP781-104

98.Page 3.11-5, Historic Context -Are any of the 119- to 126-year-old R/R structures historic? The Breakwater Seafoods building adjacent to the track west of the Wishkah River in Aberdeen is on or eligible for the national register. Please confirm.

Response GP781-104

The PS&P rail line is an existing, active railroad corridor that already carries a relatively high volume of railroad traffic between the port and the BNSF main line in Centralia, Washington. The anticipated volume of railroad traffic required by the proposed action is not expected to exceed existing amounts of noise and vibration already created by railroad traffic along this corridor. For this reason, it is considered unlikely that the proposed action's operations would affect historic resources along the railroad in a manner that would adversely affect their historical significance.

Comment GP781-105

99.Pages 3.12-4 & 3.12-6 -Maps showing the Quinault and Chehalis reservations would be a big help in determining impacts beyond those just related to fishing. For example, with no clear maps it is impossible to determine the proximity of the Chehalis Reservation to the PS&P track.

Response GP781-105

Figure 3.12-1, in Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, shows the location of the Chehalis Indian reservation in the map inset. The Quinault Indian Nation reservation's southern boundary is north of the study area.

Comment GP781-106

100.Page 3.12-7 -There are likely many more impacts to tribal interests than just the fishing described here. I suspect the Tribe will provide comments to that, but in any case the impacts section needs to be greatly expanded.

Response GP781-106

The tribal resources described in Draft EIS Chapter 3, Section 3.12, *Tribal Resources*, are not limited to fishing, but also include gathering of plant materials, hunting, and access to traditional areas.

Comment GP781-107

101.Pages 3.12-19 & 3.12-21, top pars. -There is no Section 3.12.7.2 as referenced.

Response GP781-107

The section reference has been corrected in the Final EIS.

Comment GP781-108

102.Pages 3.12-21 & 3.12-22, Section 3.12.7.1 -Mitigation listed pertains only to fisheries.

Response GP781-108

Comment acknowledged.

Comment GP781-109

103.Page 3.13-1 - Should Public Transit and schools be included here? Delays, spills, and explosions would certainly affect them.

Response GP781-109

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation,* addresses the potential impacts from construction and routine operations. Draft EIS Chapter 4, *Environmental Health and Safety*, addresses the potential for increased risk of oil spills, fires, and explosions. The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms, including potential impacts on public services and human health. Final EIS Chapter 4 has been revised to include an additional applicant mitigation measure to improve local emergency planning and response that includes development of a geographic information system (GIS) layer that identifies schools, hospitals, community centers, and parks within 0.5 mile of

the rail line to be provided to the Local Emergency Planning Commission, local fire departments, and Ecology. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP781-110

104.Page 3.14-8 - Operations would also include the transport by rail and vessel of some 17.9 million barrels of highly explosive crude oil per year. That needs to be included here.

Response GP781-110

Draft EIS Chapter 3, Section 3.15, *Hazardous Materials*, addresses hazardous material storage and handling at the project site. Risks related to the transport of crude oil to and from the project site by rail and vessel are addressed in Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*, and Section 4.6, *Environmental Health Risks—Vessel Transport,* respectively.

Comment GP781-111

105.Page 3.15-8, top bullet -This is a very important statement -the PS&P rail infrastructure improvements touted throughout this document as mitigation are (1) only if rail traffic increases up to 10 trains per day, and (2) ARE NOT FUNDED OR PROGRAMMED. In other words, they have nothing to do with this project and should not be cited.

Response GP781-111

Although these rail infrastructure improvement projects are not currently funded or programmed for implementation they are considered reasonably foreseeable by 2037 per Genesee & Wyoming which owns and operates the PS&P rail line.

As stated in Draft EIS Chapter 3, Section 3.15.4.7, *Current PS&P Rail Line Capacity and Operations*, the rail modeling analysis indicated that the existing PS&P rail line has a capacity of 12 train trips per day. This capacity estimate was used to identify potential impacts of the proposed action on rail transportation in the Draft EIS. The rail modeling assumptions and creation of stringlines to calculate daily individual train trips is described in Draft EIS Appendix K, *Rail Traffic Technical Information* (Section K.2). As stated in Section 3.15, *Rail Traffic*, existing train traffic along the PS&P rail line is between 3.0 and 3.1 trains per day on average. Operation of the proposed action at maximum throughput would add 458 unit train trips per year, or 1.25 trips per day on average, along the PS&P rail line. Therefore, this addition, there would be approximately 4.25 train trips per day along the rail line, which is approximately one-third of the capacity of the line. PS&P's capital improvement program, as described in Section 3.15.4.5, *Ongoing Maintenance and Inspections*, outlines several rail maintenance and improvement projects to be completed across the rail line to accommodate existing and future train traffic.

Comment GP781-112

106.Page 3.15-8, Section 3.15.4.1, 2nd par. -According to page 3.15-11 the PS&P line is a Class 2. Is this a different system of designation?

Response GP781-112

As stated in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, the PS&P rail line is considered a Class III, shortline railroad by the Surface Transportation Board and is based annual revenue. The Federal Railroad Administration classification of railroads is based on the number of mainline tracks and operating speed. The PS&P tracks are registered as Class 2 tracks with an overall maximum speed of 25 miles per hour for freight trains.

Comment GP781-113

107.Pages 3.15-9 & 3.15-10 -The west end of the rail line is variously described as MP 70.0, 72.6, 74.2, and 75.2.

Response GP781-113

Draft EIS Chapter 3, Section 3.15.4.2, *PS&P Rail Line Track Conditions and Physical Characteristics*, states that the portion of the PS&P rail line analyzed in the Draft EIS extends from Centralia at milepost 0.00 to the Port of Grays Harbor at milepost 70.0. The PS&P rail line extends to milepost 74.2 with right-of-way to milepost 75.2.

Comment GP781-114

108.Page 3.15-10, Rail Bridges -What is the age and condition of each of these bridges? Where exactly does the rail line cross the Chehalis River? As noted correctly on p. 3.3-8 the track does not cross it. How can the Wishkah River Bridge be at MP 68.24 when the McDonalds driveway to the east is at MP 68.31?

Response GP781-114

Refer to Response to Comment GP781-18.

Comment GP781-115

109.Page 3.15-11- As noted at the top the PS&P rail line is a Class 2, the second lowest in condition, speed limits, etc. This is an important fact to remember. In the 3rd bullet, where is it documented that this structure will be repaired? The 4th and last bullets hint to the lack of maintenance that needs to be better disclosed. And the Wishkah Bridge, at least, is a swing bridge not a drawbridge. Nowhere in this document is it stated that the rail line also crosses the Hoquiam River -decent maps would help. Under “Rail Yards” no good mapping of the Centralia or Elma yards is included anywhere.

Response GP781-115

The information in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, came from PS&P and the rail transportation study provided by the applicant. The type of bridge has been corrected. The PS&P line crosses the Hoquiam west of the project site, and therefore is not in the study area. Figures 3.15-2 and 3.15-3 illustrate the rail yards in the study area.

Comment GP781-116

110.Page 3.15-12, top par. -Throughout this document locations such as Cedar Creek, Elma Yard, Centralia Yard and Blakeslee Junction Yard are thrown out with no supporting maps to show where they are. Please add adequate mapping to show all impacted locations.

Response GP781-116

Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, Figures 3.15-2 and 3.15-3 illustrate the rail yards. Final EIS Section 3.15 has been revised to reference Blakeslee Yard rather than Blakeslee Junction. Section 3.15.4.2, *PS&P Rail Line Track Conditions and Physical Characteristics*, describes the location of the Cedar Creek siding.

Comment GP781-117

111.Page 3.15-13 - I take strong exception to the first statement. FR.A Class 2 standards are to 25 MPH, and as noted on pages 3.15-10 and 3.15-11much of this line is restricted to as low as 5 MPH due to ‘‘maintenance condition”. As noted on this page FR.A does not inspect bridges, and it is only “assumed that these maintenance projects ...would occur within the 20-year analysis period”. Please provide an honest and thorough description of the railway condition and what improvements are programmed and funded, and within what time period. This is one of the most significant shortcomings of this entire EIS analysis.

Response GP781-117

Refer to Response to Comment GP781-18.

Comment GP781-118

112.Table 3.15-4 -Please note that 1,235 trains annually/365 = 3.4 trains daily, not 3.0. This small but conveniently lower error is repeated throughout the document and should be corrected.

Response GP781-118

As explained in the table, some trains only travel a portion of the line. Therefore, the typical daily rail traffic is 3.0 trips between Centralia and Elma and 3.1 trips between Elma and Aberdeen. Based on these daily trips estimates, there are approximately 1,100 trips annually. References to the annual estimate have been corrected in the Final EIS.

Comment GP781-119

113.Page 3.15-15, 5th par. -If the theoretical capacity is 12 train trips per day, what prevents the volume from increasing to that once these projects are operational? It isn’t tank capacity as they could just bring in more ships to move it out. This is an important question as the planned 7.65 trains per day could just be the proverbial “foot in the door”. The state and other regulators have no control over the volume once this is approved.

Response GP781-119

As noted in the Master Response for Project Objectives and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant. Draft EIS Chapter 2,

Proposed Action and Alternatives, describes the type of material and approximate volumes to be transported. The City of Hoquiam would specify maximum throughput in the conditions of a shoreline development permit. In addition, other permit approvals could identify the maximum allowable (permitted) throughput of the facility. Any increase in annual throughput capacity would require revised or new permits or plans.

Comment GP781-120

114.Figures 3.15-4 & 3.15-5 -Where are similar maps showing crossings in Elma and Centralia? Both cities have a large number of at-grade crossings.

Response GP781-120

As described in Draft EIS Chapter 3, Section 3.15.4.7, *Current PS&P Rail Line Capacity and Operations*, grade crossing occupancy times are most severe at grade crossings in Aberdeen from the breakdown and buildup of trains. Therefore, the discussion of rail impacts including figures is focused on Aberdeen.

Comment GP781-121

115.Page 3.15-21, 2nd par. -Since the projects identified by PS&P in Section 3.15.3.2 are neither funded nor programmed, they should not be included as planned mitigation. In Section 3.15.5.2 under Operations -see #6 above.

Response GP781-121

Although these rail infrastructure improvement projects are not currently funded or programmed for implementation they are considered reasonably foreseeable by 2037 according to Genesee & Wyoming, which owns and operates the PS&P rail line.

As stated in Draft EIS Chapter 3, Section 3.15.4.7, *Current PS&P Rail Line Capacity and Operations*, the rail modeling analysis indicated that the PS&P rail line has a capacity of 12 train trips per day. This capacity estimate was used to identify potential impacts of the proposed action on rail transportation in the Draft EIS. The rail modeling assumptions and creation of stringlines to calculate daily individual train trips is described detail in Draft EIS Appendix K, *Rail Traffic Technical Information* (Section K.2). As stated in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, existing train traffic along the PS&P rail line is between 3.0 and 3.1 trains per day on average. Operation of the proposed action at maximum throughput would add 458 unit train trips per year, or 1.25 trips per day on average, along the PS&P rail line. Therefore, with this addition, there would be approximately 4.25 train trips per day along the rail line, which is approximately one-third of the capacity of the line. PS&P's capital improvement program, as described in Draft EIS Section 3.15.4.5, *Ongoing Maintenance and Inspections*, outlines several rail maintenance and improvement projects to be completed across the rail line to accommodate existing and future train traffic.

Comment GP781-122

116.Table 3.15 8 -The average weekly trains would be 9.2 since, as noted at Page S-9 and elsewhere, transport of crude oil is to be suspended for 2 weeks per year (458/50 = 9.16) and daily trips would be 1.30. For footnote "a" -Notice is made that Appendix L, at page L-15, describes these oil trains as

"7,419 feet in length" (1.4 mile) so apparently the 1.25 mile length is not guaranteed after all? What is the combined weight of a 120-car (or longer, apparently) oil train?

Response GP781-122

The Draft EIS analyzes potential impacts of the proposed action without mitigation based on the average number of trips. The 2-week suspension of terminal activities is a voluntary mitigation measure. Refer to the Master Response for Mitigation Framework for a discussion on how mitigation was identified for adverse impacts.

The 7,419-foot unit train length is an estimation based on 122 rail cars and three locomotives. The actual length of the unit train would vary depending on the types of locomotives used and number of tank cars. The average weight could be as much as 4,500 tons based on the 7,419-foot unit train.

Comment GP781-123

117.Page 3.15-22, Rail Capacity, 2nd par. -There is no such heading in Section 3.15.5.1. And nowhere else does it say the PS&P improvements, which are not programmed or funded, would increase the capacity to 19 trains per day. Is that the real plan once these projects are approved? The statement in the next to last sentence on this page can not be substantiated, and is in fact totally untrue in light of the other two projects - one more obvious reason they should have been combined in one EIS.

Response GP781-123

As stated in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, existing train traffic along the PS&P rail line is between 3.0 and 3.1 trains per day on average. The PS&P rail line has a maximum capacity of 12 trains per day and is currently operating well below capacity. Operation of the proposed action at maximum throughput would add 458 unit train trips per year, or 1.25 trips per day on average, along the PS&P rail line. Therefore, with this addition, there would be approximately 4.25 train trips per day along the rail line, which is approximately one-third of the capacity of the line. PS&P's capital improvement program, as described in Section 3.15.4.5, *Ongoing Maintenance and Inspections*, outlines several rail maintenance and improvement projects to be completed across the rail line to accommodate existing and future train traffic. Section 3.15, page 3.15-22 states that the planned infrastructure projects would increase the theoretical capacity of the line from 12 to 19 trains per day to accommodate existing and future train traffic. To be conservative, the analysis considers current and future capacity of the PS&P rail line at 12 trains per day and does not use the theoretical maximum of 19 trains per day. Chapter 6, *Cumulative Impacts*, discusses the potential cumulative rail impacts of the proposed action and two other reasonably foreseeable actions.

Comment GP781-124

118.Page 3.15-24, bottom par., and Figures 3.15-6 & 3.15-7 -Are these numbers per train? Per day? The most meaningful way to show crossing delay would be per train, and then how many times per day. For example, Table 3.15-5 is per train; Table 3.15-9 is per day, which is confusing.

Response GP781-124

The train times presented in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, Figures 3.15-6 and 3.15-7 are the passing time for each train event. The Final EIS has been revised to clarify the information presented in these figures.

Comment GP781-125

119.Page 3.15-27 -The maximum occupancy times (Table 3.15-10) should be labeled "per train crossing" to differentiate from the average daily occupancy times shown on Table 3.15-11. Also the last sentence in the 2nd par. is incomplete and meaningless

Response GP781-125

Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, Table 3.15-10 has been revised to address this comment.

Comment GP781-126

120.Section 3.15.7.2 -Maybe PS&P should consider but they are not the proponent and have little incentive to do so.

Response GP781-126

Refer to the Master Response for the Mitigation Framework. The measure identified is a measure to be considered.

Comment GP781-127

121.Section 3.15.8 -As oil train numbers increase, will general rail cargo be forced to decline? There is no factual support that the rail lines are safe. In fact, recent articles such as posted by the LA Times 10/13/15 conclude that oil train safety is many times worse than general rail traffic.

122.Section 3.16.4.1 -Again, a map showing all crossings in detail needs to be included.

Response GP781-127

Refer to Response to Comment GP781-18.

Comment GP781-128

123.Page 3.16-9 -In the top par., last line - grade separations are deemed unfeasible as noted on page 3.16-29. Also, in Section 3.16.5 -where are the impacts of unplanned stoppages discussed? Where are the impacts to heavy commercial truck traffic at Junction City discussed?

Response GP781-128

Grade separation was not deemed reasonable as mitigation for impacts related to the proposed action, as described in Section 3.16, *Vehicle Traffic*. The Final EIS section has been revised for clarity.

Heavy truck traffic is included in the annual average traffic data used to analyze the vehicle delay

Heavy truck traffic is included in the annual average traffic data used to analyze the vehicle delay impact at each at grade crossing. The vehicle delay at the Junction City crossing is illustrated in Appendix L, *Vehicle Traffic Analysis*.

Comment GP781-129

124.Page 3.16-13 -The first sentence is ridiculous. The current speed is 5 MPH, not 10 MPH, and the "infrastructure improvements" are neither programmed nor funded. Same applies to the next to last par. In the last par. where "as noted above" is it stated that all access to Gateway Plaza is blocked for 35 minutes four times per week? What about emergency access to Junction City industrial sites, juvenile detention center etc. with unplanned stoppages or accidents at Gateway Plaza -there is no alternative access.

Response GP781-129

Final EIS Section 3.16, *Vehicle Traffic and Safety*, has been revised to reflect the current speed of 5 miles per hour. Although these rail infrastructure improvement projects are not currently funded or programmed for implementation, they are considered reasonably foreseeable by 2037 according to Genesee & Wyoming, which owns and operates the PS&P rail line.

Regarding the 35-minute reference, Final EIS Section 3.16 has been revised to improve clarity.

Final EIS Section 3.16 reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Junction City areas. Trains going to or from the project site would be moving at the Junction City crossing except for unplanned stoppages. Final EIS Section 3.16, reflects the following information provided by PS&P: trains would not stop on the tracks during routine operations and a high-line truck would be used before each train to ensure the tracks are clear.

Comment GP781-130

125.Page 3.16-14, Vehicle Safety, 2nd par. -The "planned improvements" assumed to be implemented by 2037 are neither programmed nor funded and should not be assumed

Response GP781-130

Although these rail infrastructure improvement projects are not currently funded or programmed for implementation, they are considered reasonably foreseeable by 2037 according to Genesee & Wyoming, which owns and operates the PS&P rail line.

Comment GP781-131

126.Page 3.16-20, top line, plus pages 3.16-21, 24, 25, 26 -There is no Section 3.16.6.3 as referenced. At the 3rd bullet, again these are not programmed or funded, so why even mention them? And why is the 4th bullet even included? Why would 50% throughput be a consideration?

Response GP781-131

Regarding the first point, Final EIS Section 3.16, *Vehicle Traffic and Safety*, has been revised.

Regarding second point, the purpose of this text is to disclose that the analysis was conservative because it did not assume any new rail infrastructure improvements.

Regarding the last point, as described, the purpose of the sensitivity analysis is to determine potential vehicle delay impacts if only half the throughput of the proposed action is transported by rail in the assumed first year of operations (2017).

Comment GP781-132

127.Table 3.16-7 -These queue length increases look highly suspicious. For example, the Pearl Street crossing already exceeds available storage length (Table 3.16-4). The delay is increased due to the project by 13 minutes (from 26 minutes to 39, Table 3.15-9). Pearl Street has an ADT of 13,775 which equates to 9.6 vehicles per minute. Multiplying 9.6 vehicles per minute times 13 minutes equals 125 vehicles per day; divided by 4.7 trains per day (existing and Westway) would make around an additional 26.6 vehicles per train crossing queue at Pearl Street. Likewise, Industrial Road, with an ADT of 5,795, has 4 cars per minute. With an increase of delay time from 13 minutes per train to 22 minutes (Table 3.15-10) that would seem to equate to an additional 36 (22-13x4) vehicles delayed, not the 14 shown. Please demonstrate how my math is faulty and you arrived at much lower numbers. If it is because I am looking at cumulative numbers, then that proves my point at my very first comment -these documents needed to be combined to fairly assess the impact of both (or all 3) projects.

Response GP781-132

The numbers in Draft EIS Section 3.16, *Vehicle Traffic and Safety*, Table 3.16-7 represent the average increase in directional (per lane) queue length per train crossing. Increased train crossing occurrences do not affect this calculated queue, because the difference in average vehicle queues for three or four equivalent train crossings (all crossings have equal downtime) would be zero, even though the total vehicles delayed per day, total gate downtime per day, and total vehicles delayed per day would increase. The increase in queue length between scenarios is caused by the trains that increase the gate down time.

Comment GP781-133

128.Pages 3.16-23, bottom par., 3.16-24 top two par., 3.16-27 top -PS&P infrastructure improvements are neither programmed nor funded, so their inclusion is speculation at best.

Response GP781-133

Although these rail infrastructure improvement projects are not currently funded or programmed for implementation they are considered reasonably foreseeable by 2037 according to Genesee & Wyoming, which owns and operates the PS&P rail line.

Comment GP781-134

129.Page 3.16-24, Emergency Vehicle Access -Please include a discussion of the heavy truck traffic, industrial sites, and juvenile detention facility in Junction City, and what the effect of delays or unplanned stoppages to that area would be considering there is no alternative access

Response GP781-134

Refer to Response to Comment GP781-129.

Comment GP781-135

130.Pages 3.16-24, 25, 26 -There is no Section 3.16.6.3. as referenced.

Response GP781-135

The reference has been corrected in Final EIS Section 3.16.

Comment GP781-136

131.Page 3.16-25 -At the first bullet, the paved path is only 5 feet wide at the Junction City end (measured 10/8/15) and has sharp turns with a circle just west of there. Any heavy aid vehicle attempting to use this path in wintertime for access would instead sink to its axles in the adjacent soil. In the second bullet the underpass has a current height of only 7 feet (measured 10/8/15) which could possibly be increased to 8 feet with some work.

Response GP781-136

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Comment GP781-137

132.Page 3.16-26, top -Unless the emergency vehicles are bicycles or golf carts they will not fit as noted above. Also, when visited 10/8/15 any potential vehicular access to the underpass was blocked by construction/remodeling debris stacked at the end of the hotel - a situation the proponents of this project would have no control over.

Response GP781-137

Refer to response to previous comment.

Comment GP781-138

133.Page 3.16-26, 4th par. -"State Route 520 (SR 520) construction site" is another reference to a site which is not identified on any mapping. Please provide maps showing such sites.

Response GP781-138

Comment acknowledged.

Comment GP781-139

134.Page 3.16-27, 2nd par. -The last sentence makes no sense. This is the Proposed Action section, so why the reference to "under the no-action alternative"? What about under the Proposed Action?

Response GP781-139

The reference has been corrected in the Final EIS.

Comment GP781-140

135.Page 3.16-27, bullets -Who says the cities and Port "will approve proposed measures"? What guarantee is there of that? Also, these two bullet paragraphs are identical. Why not change the first line to read "operations of or related to..." and avoid repetition?

Response GP781-140

Draft EIS Chapter 3, Section 3.16.7.1, *Applicant Mitigation*, states that the applicant will work with organizations and cities on proposed mitigation measures.

Comment GP781-141

136.Page 3.16-28 -At the second bullet, just what kind of modem emergency vehicle has a 7 (not 8) foot clearance, and can manage the sharp turns involved with using the path? Certainly not a fire truck. At the 3rd bullet -this is the first mention of "unplanned stoppages". What is the history and predicted frequency of such stoppages? Why was this not evaluated or even mentioned elsewhere? At the 4th bullet -aren't such signs already required? Why hasn't PS&P already installed them?

Response GP781-141

Refer to Response to Comment GP781-134 and 136.

Final EIS clarifies that signage at grade crossings is required under federal and state law; the mitigation measure has been removed from the Final EIS.

Comment GP781-142

137.Section 3.16.7.2 -"Other Measures to be Considered" are meaningless if not part of the proposed project. But beyond that, ensuring that MUTCD guidance is followed, installation of gates etc. where warranted, and improving sightlines at crossings should already be done, and if not is another sign of a lack of maintenance by PS&P.

Response GP781-142

Refer to the Master Response for Mitigation Framework for the approach to identifying mitigation measures.

Comment GP781-143

138.Section 3.16.8 -The first paragraph only discusses impacts in Aberdeen. What about all the vehicular impacts in Centralia and Elma where there are numerous (but not clearly described or mapped) grade crossings? At the first bullet, the last sentence states grade separation is not reasonable, yet this future mitigation is repeated throughout this document as a possibility.

Response GP781-143

Draft EIS Section 3.16, *Vehicle Traffic and Safety*, indicates that impacts on vehicle delay in Aberdeen would be significant and. Appendix L, *Vehicle Traffic Analysis*, provides detailed information on the results of the analysis.

Refer to Response to Comment GP781-128 regarding the discussion of grade separation.

Comment GP781-144

139.Page 3.16-30, 4th line -Section 3.16.7.2 is not "Applicant Mitigation". The second paragraph again includes grade separations as possible mitigation when they have already been deemed "not reasonable". The last par. concludes "no unavoidable and significant impacts" based largely on mitigation like grade separation or other unreasonable or "possible" measures which are not, in fact, even a part of this proposal. This conclusion needs to be re-evaluated.

Response GP781-144

Grade separation was not deemed reasonable as mitigation for impacts related to the proposed action, as described in Section 3.16, *Vehicle Traffic*. The Final EIS section has been revised for clarity. Final EIS Chapter 3, Section 3.16.8, *Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?* clarifies that while implementation of proposed mitigation could reduce impacts on vehicle traffic, average and peak hour vehicle delays at the following grade crossings in Aberdeen would remain significant.

- Average hour: East Heron Street and Newell Street (Olympic Gateway Plaza area).
- Peak hour: Washington Street (Port of Grays Harbor area).

Comment GP781-145

140.Page 3.17-26 -In the top paragraph the last two sentences are repetitive. In the second paragraph what kind of shifts do the 3 pilots work that would guarantee two would be available at any time, presumed to mean 2417?

Response GP781-145

Final EIS Chapter 3, Section 3.17.5.1, *No-Action Alternative*, has been revised. RCW 88.16.103 establishes mandatory rest periods for pilots. According to this statute, Grays Harbor pilots, after completing an assignment or assignments that are at least 7 hours, will receive a mandatory rest period of 7 hours.

Comment GP781-146

141.Pages 3.17-31, 2nd full par., and 3.17-32, 181 and 2nd par. -There is no Section 3.12.7.2 as referenced.

Response GP781-146

The reference has been corrected in the Final EIS.

Comment GP781-147

142. Section 4.2.1.2, 2nd par. -"Existing tank cars must be retrofitted on a prescriptive retrofit schedule" is meaningless, evasive, and non-committal. What tanks cars WILL be used for this project? Even the new cars will burst if derailed over 18 MPH -see comment #43.

Response GP781-147

Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and that all existing tank cars be retrofitted in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643). However, as noted in Section 4.5.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport*? the risks cannot be eliminated.

Refer to the Master Response for Mitigation Framework.

Comment GP781-148

143.Section 4.3.1.2 -Bakken and diluted bitumen are two very different materials with different hazards and cleanup procedures. This project needs to be specific about what will be transported and in what quantities in order to properly assess impacts and proposed mitigation

Response GP781-148

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Comment GP781-149

144.Section 4.4.2.1, 2nd par. -"west coast oil spill data for 2014 reported 1,193 spills, of which 15 spills were over 10,000 gallons" is a mind-boggling statement which is just thrown out. Please expand on this, detailing environmental damage, cost of cleanup, lingering effects, etc.

145.Section 4.5.1 -The last sentence in the first paragraph is ridiculous -the proposed action in this document is Westway; obviously Imperium and GHRT are "likely" to increase rail trips significantly. Plus, what guarantee is there that crude oil transport and subsequent rail traffic won't grow beyond the 7.65 trains per day already planned? The state has no control over the volume once these projects are approved, does it?

Response GP781-149

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns*, reflects additional information on the economic and social costs of oil spills. This includes information on derailments and other accidents involving trains carrying crude oil and information on a crude oil spill during marine transport.

Final EIS Chapter 4, Section 4.5.1, *What are the existing risks?* has been revised to clarify the potential existing risks and response capabilities. Because Section 4.5.1, as referenced in the comment, pertains to existing risks, the statement that additional train trips other than those related to the proposed action are not likely has been deleted.

As noted in the Master Response for Project Objectives and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant. Draft EIS Chapter 2, *Proposed Action and Alternatives*, describes the type of material and approximate volumes to be transported based on this information.

Comment GP781-150

146.Page 4.5-3 -The number of rail cars transporting crude oil has increased by 68 times in only six years. That alone makes reliance on historic risks untenable. In the second full paragraph the recent accidents have been more than "significant'' -they have been environmentally and socially devastating. This document needs to acknowledge that and not soft-sell these risks. At the bottom shouldn't the bulleted list include structure condition and integrity? Some of these structures are so bad the trains must slow to 5 MPH to cross them. Isn't that an obvious sign of lacking maintenance and upgrades?

Response GP781-150

Refer to Response to Comment GP781-18.

Comment GP781-151

147.Page 4.5-4, top par. -Please provide a map showing where rail traffic for this project crosses the Hoquiam River. In the 2nd par. -1.30 trains per day planned, added to 3.4 trains currently. In Section 4.5.2.1 please elaborate on the causes of these derailments how does ''track separation" happen? "Wide gauge"? "Thermal misalignment" in May?? "Track geometry design"? Are these all related to lack of proper maintenance? What happens when 3.4 trains per day becomes 7.65 (or more) longer, heavier crude oil trains? Please add a discussion of the 10/13/15 LA Times article which describes officials' concerns with the impact of longer, heavier oil trains on railroad infrastructure.

Response GP781-151

Chapter 3, Section 3.15, *Rail Traffic*, presents maps of the PS&P rail line in the study area (Figures 3.15-2 and 3.15-3) and discusses rail operations. For information about how the risk assessment considers data specific to crude oil train operations, refer to the Master Response for Risk Assessment Methods.

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not

completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP781-152

148.Page 4.5-5, bullets at bottom -Regarding "rail car improvements", the acting director of FRA is on record stating that the "improved" tank cars are only slightly better than the old ones, and in fact "There is not a tank car at this moment or even the new version of the tank car we've proposed that will survive a derailment above, say, 16 or 18 miles an hour" (Sarah Feinberg, 3/20/15 transcript). She also notes that most recent derailments have been at low speed, and says, "I would prefer that none of this stuff [Bakken crude] be traveling by rail". Please be honest and acknowledge that sentiment by FRA leadership in this document. Also, according to the above noted LA Times article, there are 3 derailments per day in the US. That, coupled with the added stress on the rails caused by longer, heavier oil trains, makes these figures highly suspicious.

Response GP781-152

As noted in Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion. Section 4.7, *Impacts on Resources*, has been updated to include all the crude oil spills that have occurring during rail transit per the National Transportation Safety Board over the past 10 years.

Comment GP781-153

149.Page 4.5-6, par. below table -In light of an increase of crude oil tank traffic of 68 times in 6 years, over 16 documented major spills and explosions in the last 2 years, 4 derailments on PS&P in 2 months in 2014, the disclosures by the LA Times, and the statements by Ms. Feinberg, how can you make the statement that risk "would remain relatively low"?

Response GP781-153

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment GP781-154

150.Page 4.5-7, 3ro bullet -Why was this included when the current speed limit is 25 at best?

Response GP781-154

The referenced text presents the U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration's final rule that defines and regulates high-hazard flammable trains (49 Code of Federal Regulations [CFR] 171–180) and notes that trains already operate at lower speeds on the PS&P rail line.

Comment GP781-155

151.Page 4.5-10 -The risk of fire or explosion is grossly understated. "long-term historical data" has little bearing on an industry that has increased by a factor of 68 times in only 6 years. The statement that "the chance of an extreme derailment is very limited in the study area because of the slow speeds" contradicts the opinion of the FRA director, who 162.Pages 5-12 bottom and 5-13 top - Locations such as Wishram, Hinkle, and Beatrice should be shown on a map if important enough to mention in the text.

Response GP781-155

Derailments can occur at any speed as noted; however, they are likely to involve more cars at higher speeds. The quoted statement is specifically about extreme derailments. Refer to the Master Response for Risk Assessment Methods.

Comment GP781-156

163.Sections 5.4.3.3, 5.5.1.1 -This is the Extended Rail section but all discussion is of routes in WA only.

Response GP781-156

Final EIS Chapter 5, *Extended Rail and Vessel Transport*, reflects additional information about the BNSF rail segments from Williston Basin to the Idaho/Washington border.

Comment GP781-157

164.Figure 5-10 -This figure, like many others, is unreadable in either electronic or printed format.

Response GP781-157

The figure (now 5-6) has been replaced with a higher-resolution version in the Final EIS.

Comment GP781-158

165.Page 5-27, 2nd par. -There is no Section 5.4.2.1 as referenced. Why is there no discussion of just transporting the crude oil directly to the refineries and not through fragile Grays Harbor?

Response GP781-158

The section reference has been updated in the Final EIS. As noted in the Master Response for Project Objectives and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant.

Comment GP781-159

166.Page 6-1 -Why did it take reading some 561 pages to get to the only section that really matters? Please explain why this should not be interpreted as an effort to keep readers, especially inexperienced ones, from even getting this far.

Response GP781-159

The structure of the Draft EIS for the Westway Terminal Expansion Project is typical of EISs for projects of this scale. A *Table of Contents* and EIS *Summary* have been included in the Draft EIS and Final EIS to assist readers with locating sections that are most relevant to their area of interest, expertise, and/or jurisdiction.

Comment GP781-160

167.Section 6.4.1, 2nd bullet -According to page 3.15-11 PS&P is a class 2 R/R and according to page 5-11BNSF is a class 4.

Response GP781-160

PS&P is a Class III railroad and BNSF is a Class I railroad based on the Surface Transportation Board classification system. The commenter is citing the Federal Railroad Administration-defined track class of the rail.

Comment GP781-161

168.Section 6.4.2 -Were requests for information not sent to Centralia? Or Rochester? And please correct the spelling of McCleary.

Response GP781-161

The cities where requests were sent to are identified in Draft EIS Chapter 6, Section 6.4.2, *Ongoing and Reasonably Foreseeable Future Actions*. The spelling has been corrected in Final EIS Section 6.4.2.

Comment GP781-162

169.Table 6-2 - Since transport of crude oil is supposed to be halted for 2 weeks, the annual figures for Westway, Imperium, and GHRT should be divided by 50 to show the weekly numbers and 351 for the daily numbers -Westway 1.30 and 9.16; Imperium 2.08 and 14.60; and GHRT 1.04 and 7.30, with totals of 4.42 and 31.06 (since some were carried out to 2 decimal places, all should be). Please make these changes consistently throughout all six documents.

Response GP781-162

The Draft EIS analyzed potential impacts without proposed mitigation.

Comment GP781-163

170.Page 6-8, top -There is no limit to expansion of throughput once these projects are approved. How can it be stated that violations of standards would not likely occur?

Response GP781-163

As noted in the Master Response for Project Objectives and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant. Draft EIS Chapter 2, *Proposed Action and Alternatives*, describes the type of material and approximate volumes to be

transported based on this information. The City of Hoquiam will specify maximum throughput in the conditions of a shoreline development permit.

Comment GP781-164

171.Figures 6-2, 6-3, 6-4 - Shouldn't GHRT be shown on these cumulative impacts maps?

Response GP781-164

The Grays Harbor Rail Terminal Project site is 3 miles west of the project site. The study area include the PS&P rail line between Centralia and the Westway project site on which the proposed action could have additive impacts. Refer to the Master Response for Cumulative Analysis.

Comment GP781-165

172.Table 6-4 -How can projects that add nearly 104,000 metric tons of C02 possibly be in conformance with state and federal requirements to lower emissions?

Response GP781-165

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP781-166

173.Page 6-13, bottom par. -If this oil replaces oil currently used in US refineries, why not just ship it directly to them? Why is this not discussed anywhere, besides that fact that it is not the proposal being pushed by these particular companies?

Response GP781-166

As noted in the Master Response for Project Objective and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant.

Comment GP781-167

174.Table 6.6 -According to Table 6-2 the annual rail trips would be 458, 730, and 365 for the three projects. Assuming half of the time they are empty; oil throughput will cease for two weeks per year; and each unit train of 120 cars carries 85,680 barrels of oil (120 cars x 714 barrels per car), the daily throughput should be 458/2/351 days (365-14) x 85,680 = 55,692 barrels per day for Westway; 730/2/351 x 85,680 = 89,107 for Imperium; and 365/2/351 x 85,680 = 44,554 for GHRT, for a daily total of 189,353 barrels. Please correct these totals wherever they are used.

Response GP781-167

The Draft EIS analyzes potential impacts of the proposed action without mitigation based on the average number of trips. The 2-week suspension of terminal activities is a voluntary mitigation measure. Refer to the Master Response for Mitigation Framework for a discussion on how mitigation was developed.

Comment GP781-168

175.Section 6.5.2, 2nd par. -The analysis cited in Section 3.7 was for one project. This analysis needs to include all 3 projects to be adequate.

Response GP781-168

The analysis in Draft EIS Chapter 6, Section 6.5.2.2, *Cumulative Impacts*, considers the combined traffic of the cumulative projects. The reference noted in the comment indicates the methods used in the analysis of cumulative impacts are the same as described in Section 3.7, *Noise and Vibration*.

Comment GP781-169

176.Table 6-7, Segment J-Itis hard to believe there would be zero wayside impacts within the 11Aberdeen crossings. At the very least the hotel on the east side of the Wishkah River would seem to be impacted by 7.65 trains per day with nearly hour long passing times.

Response GP781-169

Draft EIS Chapter 6, Section 6.5.2, *Noise*, identifies no moderate or severe impacts in that area related to wayside noise.

Comment GP781-170

177.Table 6-8 -None of the many crossings in Centralia, Aberdeen, Oakville or Rochester are affected? Pretty hard to believe. Again, a detailed map of the crossings in the cities besides Aberdeen would help a lot.

Response GP781-170

As explained in Draft EIS Chapter 6, *Cumulative Impacts*, Table 6-8 illustrates the grade crossings exposed to the highest noise increases from train horn noise. All public at-grade crossings in the study area were analyzed.

Comment GP781-171

178.Section 6.5.2.3, 2nd bullet -This does not sound very practical for cities like Centralia or Elma with many at-grade crossings (how many is unclear since no detailed maps are included, even in appendices). Are residents expected to trade off decreased safety for a little less noise?

Response GP781-171

Appendix G, *Noise Data,* provides a table of all the grade crossings in the study area and estimated number of moderate and severe noise impacts at sensitive receptors. Implementation of a quiet zone is subject to Federal Railroad Administration approval and would include measures to maintain the level of safety while reducing noise.

Comment GP781-172

179.Page 6-28, Rail Traffic -According to my math 2,788/365= 7.64 trips per day (or even higher if divided by 351 [365 - 2 weeks closure]). This number and the “3” or “3.1” (actually 3.38) for existing

traffic have been consistently and conveniently understated throughout this document. In Table 6-9 change the number of proposed trips as noted in #169 above. Change the existing rail traffic to 3.38 daily and 23.75 weekly. Under "Capacity for Additional Trains" again change 3 to 3.38 or at least 3.4. The last sentence completely ignores the fact that these will be longer, heavier trains, but it does confirm that PS&P has no intention of improving this line.

Response GP781-172

Final EIS Chapter 3, Section 3.15, *Rail Traffic*, Table 3.15-4 and associated text have been revised to clarify trips for the proposed action. As explained in the table, some trains only travel a portion of the line. Therefore, the typical daily rail traffic is 3.0 trips between Centralia and Elma, and 3.1 trips between Elma and Aberdeen. Final EIS Chapter 6, Section 6.5.4.2, *Rail Traffic*, has been revised to improve clarity with no revisions to the average unit train trips.

Comment GP781-173

180.Page 6-29 -In the paragraph above Table 6-11"(existing trains from the cumulative projects)" makes no sense -existing trains would be the same as No Action. Table 6-11 is labeled "Maximum Daily Occupancy Time" but the same numbers are found on Table 3.15-5 which says "for Each Train Transit". So which is correct -per day, or per train?

Response GP781-173

Final EIS Chapter 6, *Cumulative Impacts*, has been revised to clarify that existing trains would be the same as no-action trains. Table headings in this section have been revised to improve clarity.

Comment GP781-174

181.Table 6-12 -Why are the Average Daily times shown here higher than the Maximum Daily times shown on Table 6-11? Are these numbers just plucked out of the air at random?

Response GP781-174

Draft EIS Chapter 6, *Cumulative Impacts*, describes the differences between the tables. Table 6-11 presents the maximum daily occupancy time from the passage of one train. Table 6-12 illustrates the average daily occupancy time. For example, at Fleet Street, the maximum amount of time a train would block the crossing under the no-action alternative is 37 minutes (Table 6-11). On average, the Fleet Street crossing would be blocked by trains 49 minutes each day under the no-action alternative (Table 6-12). Final EIS Chapter 6 has been revised to improve clarity.

Comment GP781-175

182.Section 6.5.4.4 -A tripling of occupancy times is not a significant impact? Only if you don't use those streets. Why is it necessary to repeat the reference to Section 3.16 again when stated just above?

Response GP781-175

Draft EIS Section 6.5.4.4, *Unavoidable and Significant Adverse Environmental Impacts,* describes why there are no unavoidable and significant adverse impacts on rail traffic. Final EIS Section 6.5.4.4 has been revised to improve clarity.

Comment GP781-176

183.Page 6-31, bottom par. -The first sentence makes no sense -25 trips? 184.Page 6-32, 3ro. par., 5th line -The reference should be to Table 6-12 where those numbers are shown. It should also be pointed out that Industrial Road will be blocked for 3 hours 23 minutes, up from the current 43 minutes.

Response GP781-176

Final EIS Chapter 6, Section 6.5.5, *Vehicle Traffic and Safety*, has been revised.

Comment GP781-177

185.Page 6-36, 1st bullet -The Wishkah Bridge improvements are neither programmed nor funded. The current speed is 5 MPH, not 10 MPH, due to lack of repair. Grade separations have been deemed not feasible (p. 3.16-29) but keep being implied as future mitigation.

Response GP781-177

Final EIS Chapter 6, *Cumulative Impacts*, has been revised to state that the current speed on the Wishkah Bridge is 5 miles per hour. Grade separation is feasible but was not deemed reasonable as mitigation for the proposed action as described in Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic*. Refer to the Master Response for Mitigation Framework.

Comment GP781-178

186.Table 6-17 -As noted at # 127 above these queue length numbers look highly suspicious. Pearl street queue already exceeds available storage. At an ADT of 13,775 it has 9.6 vehicles per minute. According to Table 6-10 the delay will be 42 minutes longer; 42x9.6=403 cars, divided by 7.65 trains per day = 53 additional cars per queue, not 23. Please explain why my math is not correct.

Response GP781-178

Draft EIS Appendix L, *Vehicle Traffic Analysis*, provides detailed information on and methods for conducting the vehicle transportation analysis.

Comment GP781-179

187.Page 6-39, 2nd bullet -These infrastructure improvements are not programmed or funded and should not be continually listed as mitigation. Likewise in the paragraph following the 3ro. bullet. And “efforts to evaluate” will not “help to mitigate” in any real world situation.

Response GP781-179

Draft EIS Chapter 3, Section 3.15, *Rail Traffic,* identifies the infrastructure improvements as planned improvements by 2037. These improvements are not considered mitigation for the proposed action. Refer to the Master Response for Baseline and No-Action Alternative for additional information.

Comment GP781-180

188.Page 6-41, both bullets -"Westway ...0.6 times per day" and "Imperium ... 1.0 time per day"? These times reflect only trains operating in one direction, and do not include GHRT or existing train traffic. That is highly misleading and speculative at best. And 7.65 trains per day are going to block off Home Depot for up to 1hour 17 minutes at a time? This is the first acknowledgement of that impact. What are the plans for emergency access in case of a robbery, fire, heart attack or unscheduled birth there?

Response GP781-180

As described in Draft EIS Chapter 6, *Cumulative Impacts*, the impacts are only applicable to loaded trains for the proposed action and the REG (formerly Imperium Terminal Services) Expansion Project. The impacts from empty (eastbound) trains for the proposed action and REG Expansion Project would be at the Olympic Gateway Plaza area. As described in the text, the 1 hour 17 minutes of blockage time only applies to REG loaded trains. Section 6.5.5.3, *Mitigation Measures*, describes the proposed mitigation measures.

Comment GP781-181

189.Page 6-42 -"will work with", ''will ensure", agencies "will approve" is nebulous and speculative at best. What actual measures will be funded and accomplished? At the 3m bullet what modern "pumper and ambulance" combination with a clearance considerably less than 8 feet (current clearance is 7 feet) will be provided? Where will it be kept - on private property south of the tracks? At what cost? Has this been coordinated with the property owners? Where is the mitigation for emergency access concerns at Home Depot? At the 5th bullet -aren't these measures already required at crossings? Why are they not in place?

Response GP781-181

Refer to Response to Comment GP781-136. Final EIS clarifies that signage at grade crossings is required under federal and state law; the mitigation measure has been removed from the Final EIS.

Comment GP781-182

190.Section 6.5.5.4 - Since this section only mentions Aberdeen, is the reader to assume there are no significant delays or safety concerns in Centralia? Elma? In the second paragraph grade separations are again offered up, even though they were deemed not feasible.

Response GP781-182

Final EIS Chapter 6, Section 6.5.5.4, *Unavoidable and Significant Adverse Environmental Impacts*, clarifies that while implementation of the mitigation measures described in Chapter 3, Section 3.16,

could reduce impacts on vehicle traffic, average and peak hour vehicle delay at the following grade crossings would remain significant.

- Average hour: All six crossings in the Olympic Gateway Plaza area (Aberdeen) and three crossings (Industrial Road, North Maple Street, and West 1st Street in the Port area (Aberdeen).
- Peak hour: Washington Street in the Port area (Aberdeen).

Refer to Response to Comment GP781-128 regarding the discussion of grade separation.

Comment GP781-183

191.Table 6-18 -Please explain why the numbers for baseline tank vessels are different from Table 3.17-11. The "b" footnote gives a clue, but is not very explicit. Unlike the baseline, project trips are assumed the same in 2037 as in 2017. What guarantee is there than train trips, and subsequently vessel trips, will not increase once these projects are approved? The paragraph following the table references Table 6-1 which does not appear related to 2-hour windows or depth as implied

192.Page 6-45, last line - So if Terminal 1capacity is exceeded, what will happen -terminal expansion? Where are the details of this cumulative impact discussed?

Response GP781-183

Draft EIS Chapter 6, *Cumulative Impacts*, Table 6-18 compares vessel trips in 2017 and 2037 with and without the cumulative projects. Vessels trips under the no-action alternative include existing vessels calling at Terminal 1 for REG (formerly Imperium Terminal Services). Because the REG Expansion Project represents total facility throughout rather than additive throughput, existing vessel counts are included in the proposed counts. Therefore, existing REG vessels have been deducted from the baseline vessel trips considered in cumulative so as to not double-count these vessels.

Comment GP781-184

193.Section 6.5.7 -All of the tables and numbers cited in this section need to take into account the poor condition of the PS&P line, as evidenced by the reduced speeds east of Aberdeen and across the Wishkah River Bridge. There is no evidence that was done at all -more like volumes were just plugged into a standard formula.

Response GP781-184

The methods used to determine PS&P rail line capacity include existing infrastructure and speeds. Refer to Draft EIS Section 3.15.4.7, *Current PS&P Rail Line Capacity and Operations*.

Comment GP781-185

194.Page 6-53, top -"extreme failure ... every 9,000 years" seems totally inconsistent with recent studies claiming we are "300 years into a 240 year cycle" for a major catastrophic seismic event.

Response GP781-185

Draft EIS Chapter 4, Section 4.4, *Environmental Health Risks—Terminal (Onsite),* and Chapter 6, Section 6.5.7, *Environmental Health and Safety*, describe the risk and potential for storage failure for

the proposed action and cumulative projects, respectively. Appendix M, *Risk Assessment Technical Report,* describes the data sources for the assumptions used to conduct the risk assessment for storage tank failure. Because storage tank failure could result from different factors, the analysis does not assume any one cause of tank failure. The tank failure rate developed for the analysis is based on studies that analyzed historical data of previous storage tank releases caused by a variety of factors, including weather-related factors.

Comment GP781-186

195.Page 6-54, par. following bullets -The total trains per day is closer to 7.65. As noted at #148 above, the director of FRA would probably disagree with "a derailment does not mean a spill will happen". At the end of the next paragraph "the risk of very large releases remains relatively low" seems rather optimistic in light of a 68 times increase in crude rail trains in 6 years, deteriorating rail lines and structures, poor maintenance, 16 major accidents in 2 years, and tank cars that rupture at derailments over 18MPR Please re-evaluate that claim.

Response GP781-186

Regarding the number of trips, as explained in Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, Table 3.15-4, some trains only travel a portion of the line. Therefore, the typical daily rail traffic is 3.0 trips between Centralia and Elma, and 3.1 trips between Elma and Aberdeen and the number of cumulative trips (7.35 trips) is accurate. Regarding the last point, Final EIS Chapter 6, *Cumulative Impacts,* has been revised to improve clarity.

Comment GP781-187

196.Page 6-56, 2nd par. -Speeds may be slower, but that is largely due to the poor condition of the railway, which should be a major factor in the likelihood of a major calamity. And as noted in #148 the director of FRA stated that most recent derailments have been at low speed, not high speed.

Response GP781-187

The text is discussing extreme derailments and the greatest chance of a fire or explosion, not the potential for derailments.

Comment GP781-188

197.Page 6-58, bottom -The impact to homes, businesses, public services, and peoples' lives should be included.

Response GP781-188

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4, *What are the costs of the proposed action?* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* has been updated to provide additional information about economic and social

costs of oil spills. Final EIS Section 4.7, *Impacts on Resources*, has also been revised to more fully describe the potential human health impacts.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-189

198.Section 6.5.7.3 -All mitigation listed is related to oil spills. What about emergency access? Also there is not a word about railway improvements, but then that isn't part of this project anyway.

Response GP781-189

The mitigation measures listed are for the subsection *Environmental Health and Safety*. Emergency service response is addressed in Draft EIS Chapter 6 Section 6.5.5, *Vehicle Traffic and Safety*. Mitigation related to impacts of the proposed action on vehicle traffic and safety is presented in Final EIS Chapter 3, Section 3.16. These measures would also reduce cumulative impacts. As described in Section 6.5.4, *Rail* Traffic, there would be sufficient capacity to accommodate the increase in rail traffic and no mitigation is needed. Refer to the Master Response for Mitigation Framework.

Comment GP781-190

199.Section 6.5.7.4 -Please supplement these bullets with information relative to the FRA Director's statement noted in #148 above.

Response GP781-190

Refer to Response to Comment GP781-152.

Comment GP781-191

200.Section 6.5.8.1 -In the second par., 4th line, there is no Table 5-8 in Chapter 5. Even though this is the Extended Study Area section, statements in the second and third paragraphs refer only to Washington State. And the footnote refers to 5.5 additional rail trips per day -isn't it 4.40?

Response GP781-191

Final EIS Section 6.5.8, *Extended Rail and Vessel Transport*, has been revised to reflect a fuller discussion of the entire rail route, where available. Trip numbers have been clarified in the Final EIS.

Comment GP781-192

201.Chapter 7 -Why was this information not included in Cumulative Impacts? Without knowing the combined impacts of all 3 projects this information is worthless.

Response GP781-192

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for an explanation of the basis for the scope of the analysis in Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-193

202.Page 7-7, 4th par. -"Essentially, all business taxes and net business income related to onsite operations and income earned by rail and vessel operators would leave Grays Harbor County and would not result in regional employment or income." That statement says a lot about the perceived benefits to the local economy, doesn't it? Where are the economic impacts of spills, leaks, and explosions quantified? Also the reduction in property values and ability to sell?

Response GP781-193

Refer to Response to Comment GP781-188.

Comment GP781-194

203.Page 7-11-Need to add the impacts to heavy commercial traffic, industries, and the juvenile detention center at Junction City, which has no alternative access at all.

Response GP781-194

Refer to Response to Comment GP781-129.

Comment GP781-195

204.Figure 7-1 -Need a much larger scale map that clearly shows the grade crossings in Centralia, Rochester, Oakville, and Elma.

Response GP781-195

Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, Figure 7-1, presents the specific access limitations or areas where access is completely blocked by a passing train. It is not intended to show all grade crossings in all communities along the PS&P rail line, and as such, no revisions are necessary.

Comment GP781-196

205.Page 7-16 -This project clearly targets an area of low income and/or minority residents. Please explain how that is not a violation of environmental justice regulations.

Response GP781-196

Draft EIS Chapter 7, Section 7.2, *Social Policy*, includes an analysis of impacts on minority and low-income populations. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-197

206.Page 7-21, Rail- See #169 above. The cumulative rail traffic would be 7.65 trains per day, 4.40 of which would be longer than current That is why this discussion should have been included in Cumulative Impacts - saying "one unit train" grossly understates the real impact. In the last paragraph "the chances of encountering and having to wait for a passing train would not notably change compared to the no-action alternative" is untrue when you have a 125% increase in train traffic and longer trains.

Response GP781-197

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for an explanation of the basis for the scope of the analysis in Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-198

207.Page 7-22, par. following bullets -As noted many times the cited mitigation is pie-in-the sky, not programmed or funded. It should not be listed. Under Vessel, again cumulative impacts should be described.

Response GP781-198

Draft EIS Chapter 7, Section 7.2, *Social Policy*, includes an analysis of impacts on minority and low-income populations. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-199

208.Page 7-24, 4th par. - Same comment -mitigation is not a sure thing at all. The two sentences directly above "Vessel" are profound and need to be emphasized elsewhere.

Response GP781-199

Comment acknowledged.

Comment GP781-200

209.Section 7.2.5.1, 3rd bullet -Only to Hoquiam?

Response GP781-200

Draft EIS Chapter 7, Section 7.2, *Social Policy*, includes an analysis of impacts on minority and low-income populations. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-201

210.Section 7.3, footnote -These risks and impacts should have been included in the cost benefit analysis, as should other areas besides Hoquiam.

Response GP781-201

Draft EIS Chapter 7, Section 7.2, *Social Policy*, includes an analysis of impacts on minority and low-income populations. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-202

211.Page 7-30, 3rd par. -The PS&P rail line is located entirely in Aberdeen? Since when?

Response GP781-202

The referenced text is in Draft EIS Chapter 7, Section 7.3.2.2, *Impact Analysis*, and discusses impacts from the proposed action including noise and vibration effects. The Final EIS section clarifies that the portion of the PS&P line that would be used by crude oil trains travelling to and from the project site is located in or east of Aberdeen.

Comment GP781-203

212.Section 7.3.3.1 -Does this section assume that the skills to build massive tanks are available locally? That seems unlikely.

Response GP781-203

Refer to Draft EIS Chapter 7, Section 7.3.3.1, *Employment and Income*, for an estimate of the proportion of employment and income likely to benefit the City of Hoquiam.

Comment GP781-204

213.Page 7-32, 2nd par. -Only 15 jobs, and only 3 to 4 of them from Hoquiam? And for that the city is willing to accept the huge risks associated with this project? Incredible.

Response GP781-204

Comment acknowledged.

Comment GP781-205

214.Page 7-40, Environmental Health and Safety -The cost of training for Hoquiam, as well as the other affected jurisdictions, needs to be estimated and included.

Response GP781-205

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based

on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP781-206

Comments on Westway Volume 2 are not provided as there is just too much here to review in the given timeframe.

Westway Volume 3

215.Appendix J, P. 7-3, PS&P Rail Line -Why was the 119- to 126-year-old rail line not surveyed? At the very least its structures are probably historic. Also, on the west side of the Wishkah River adjacent to the track is the Breakwater Seafood building which is on or eligible for the historic register. When the bridge ultimately fails under the load of 1.25 mile-long crude oil trains it will possibly affect this structure.

Response GP781-206

The PS&P rail line is an existing, active railroad corridor that is already trafficked by a relatively high volume of railroad traffic between the Port and the BNSF main line in Centralia, Washington. The anticipated volume of railroad traffic required by the proposed action is not expected to exceed existing amounts of noise and vibration already created by railroad traffic along this corridor. For this reason, it is considered unlikely that the proposed action's operations would affect historic resources along the railroad in a manner that would adversely affect their historical significance.

Refer to the Master Response for Geographic Scope of the EIS and the inventory of cultural resources described in Draft EIS Appendix J, *Cultural Resources Technical Report*.

Comment GP781-207

216.Appendix L, Table L-6, Glenn Road, Newman Creek Road, Calder Road -US 12 mileposts would be nowhere near those shown. US 12 begins at the junction with US 101 in Aberdeen -MP 0.0 to 0.27 would only bemile east of there, not east of Montesano where these roads are.

Response GP781-207

The table has been revised in the Final EIS Appendix L, *Vehicle Traffic Analysis*, based on comments from Washington State Department of Transportation.

Comment GP781-208

217.Page L-14, last par. - Streets such as Maple, Main, and Locust need to be shown on a detailed map as was done for Aberdeen.

Response GP781-208

Comment acknowledged.

Comment GP781-209

218.Page L-15, 3rd line -This is the first reference to the oil trains being as long as 1.4 mile. As stated earlier there is no state regulation limiting the number or length of oil trains once these projects are permitted. These projects are just the foot-in-the-door for bringing crude oil through a sensitive area where it does not currently exist.

Response GP781-209

As noted in the Master Response for Project Objectives and Alternatives, the proposed action is a private project and the objectives and proposal are defined by the applicant. Draft EIS Chapter 2, *Proposed Action and Alternatives*, describes the type of material and approximate volumes to be transported based on this information. The City of Hoquiam will specify maximum throughput in the conditions of a shoreline development permit. In addition, other permit approvals could identify the maximum allowable (permitted) throughput of the facility. Any increase in annual throughput capacity would require revised or new permits or plans.

Comment GP781-210

219.Page Ll-3, bottom par. -This paragraph implies that the following table shows all of the affected at-grade crossings, when in fact it only shows 25 of the 81 (p. L-13) modeled.

Response GP781-210

Draft EIS Appendix L, *Vehicle Traffic Analysis*, accurately states that the crossings that would experience a decrease in level of service are shown in Table L-7. Tables 11 through 43 in Attachment L-1 show detailed information for all 81 crossings.

Comment GP781-211

220.Attachment L-1, Tables 2-8 -These tables should at the very least include the Devonshire Road and Industrial Road crossings. # 18 Sargent Blvd/Junction City Rd should settle on one name as they are the same road.

Response GP781-211

The study in Draft EIS Appendix L, *Vehicle Traffic Analysis*, Attachment L-1,Tables 2 through 8 were identified in coordination with the Washington State Department of Transportation as the study crossings on which to focus the vehicle delay analysis. Devonshire Road is included in Tables 10, 12, 14, 16, 18, 20, 22, 24, 26, 28 for vehicle delay and Tables 32, 34, 36, 38, 40, and 42 for predicted accident frequency. Industrial Road is included in Tables 11, 13, 15, 17, 19, 21, 23, 25, 27, and 29 for vehicle delay and Tables 33, 35, 37, 39, 41, and 43 for predicted accident frequency. All remaining crossings along the PS&P rail line analyzed in detail for potential impacts to vehicle delay and predicted accident frequency are displayed in Tables 11 through 43.

The naming convention Sargent Blvd/Junction City Rd is used to help readers better identify the roadway if they are only familiar with one of the road names.

Comment GP781-212

221.Attachment L-1, Figures 1-4 -Please spell "Chehalis" correctly. I have tried to not point out the numerous misspellings and other typos, but some just jump out.

Response GP781-212

The Final EIS has been revised to correct the spelling of Chehalis.

Comment GP781-213

222.Appendix M,P. 4-5, bullets -As noted above in #147 the causes of the derailments need better explanation than "wide gage" or "track geometry design". Were they due to poor maintenance? Age of the railway? Vandalism? This is important - please give a detailed assessment of the causes.

Response GP781-213

The explanations for the derailments described in the Draft EIS Appendix M, *Risk Assessment Technical Report*, were provided by the PS&P Railroad.

Comment GP781-214

223.Appendix M, Page 4-6 -In Table 6 and the paragraph that follows it is noted that the accident rate on the PS&P line is ten times that of the nationwide average for class 2 track (actually 27 times the average for mainline class 2 track). This fact needs more disclosure than being buried in an appendix. This needs at the very least to be disclosed in Volume I. And the results at the bottom and next page obviously do not take into account the condition of the railway and structures, which is so bad it reduces track speeds from the class 2 norm of 25 MPH to 10 MPH east of Aberdeen and 5 MPH at the Wishkah River Bridge. This is a major under-assessment of this study.

224.Appendix M, Page 6-2, 4th par. -"circumstances ...are less likely...because the speeds...are so low" is totally contrary to logic and the opinion of the FRA director cited above, and the evidence cited in the LA Times article. "Although the rates of accidents on this line are greater than the national average" is a gross understatement -they are 10- 27 times higher. "implementation of the stronger rail cars" will provide only marginal improvement, again according to the FRA director.

Response GP781-214

Final EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* has been revised to add information about the assumptions used in the risk scenarios presented in Appendix M, *Risk Assessment Technical Report*. For additional information about the approach, assumptions, and data sources used, refer to the Master Response for Risk Assessment Methods.

Comment GP781-215

225.Appendix M, Page 7-4, bottom - "The overall chance of an accident...is once in 1.7 years"! I don't recall seeing this very telling statement anywhere in the Volume 1text. It needs to be prominently repeated there. Once in 1.7 years is much worse than we were lead to believe there.

Response GP781-215

The reference in the comment to an incident occurring once in 1.7 years is for the no-action alternative and as noted in Appendix M, *Risk Assessment Technical Report*, does not represent the likelihood that a spill would occur but rather the chance than any incident might occur regardless of the potential for a release. Similar estimates for rail and vessel transport related to the proposed action are given on Draft EIS pages 4-8 and 5-6, respectively. These numbers represent the incremental chance of any incident associated with the proposed action. Similarly, they do not represent the equivalent chance of a spill. The combined risks of a spill are not presented in the Draft EIS for the reasons discussed in the Master Response for Risk Assessment Methods.

Comment GP781-216

226.Appendix 0, page 3, 4th par. -Vessels are shown as 260 when the correct number is 319 plus another 60 for GHRT (Vol. 1, Table 6-18).

227.Appendix 0, Page 4, Westway -"receive approximately 9.6 million barrels ...and store 800,000 barrels"? Volume 1at page 2-8 states 19.2 million barrels to be shipped and page 2-7 shows 1million to be stored. The last paragraph again states 9,600,000 barrels to be shipped on 60 barges and vessels, contrary to the 119 ships listed on page 6.6, and lists four new tanks rather than 5.

228.Appendix 0, Page 5, top par. -Technically, the Imperium site is 22.9 ac., of which this project will develop 10.9 ac. In the 5th pararagraph, the unit trains are estimated at 120 cars, not 105 (Imperium Vol. 1, Table 3.15-8).

229.Appendix 0, Page 12, #6 -The main text states 319 vessels for the 2 projects and 379 for all three (Vol. 1, Table 6-3).

230.Appendix 0, Page 22 -In the first paragraph it is 5 new tanks, not 4. In the 2nd paragraph it is 19.2 million barrels, not 9,600,000. In the 3rd it is 119 vessel calls, not 60. In the 6 paragraph it is 120 tank cars, not 105 (per Vol. 1, Table 3.15-8). These last 5 comments beg the question -if this 2014 Economics Impacts Analysis can't get the basic volume numbers of the two projects correct, why should the reader assume the conclusions are correct since they are based in part on incorrect numbers?

Response GP781-216

Draft EIS Section 3.17, *Vessel Traffic*, notes the number of vessel trips to and from the project site would vary but on average would result in 119 trips per year (one-way) or approximately 60 vessel calls per year (round trips), as was specified in Draft EIS Appendix O, *Economic Impact Analysis*. Draft EIS Section 3.15, *Rail Traffic*, notes that the exact number of trips and the length of trains traveling to and from the project site would vary, but could be expected to be as long as up to 120 rail cars. Details about rail and vessel transport do not affect the results of the economic analysis.

Comment GP781-217

As a footnote, I find it interesting that the DEIS preparer, ICF International, cannot even get their own address correct. Please note that on page 2 of the cover letter, page 5 of the fact sheet, and Summary page S-2 in both documents, and on the project website, all 4 right after the heading of “Comments may be submitted by mailto:”, they are shown at “710 Second Street”, an address that does not exist in Seattle. Only page 4 in the fact sheet and the online comment form show the correct

address of "710 Second Avenue". I find directing comments to a non-existent address troubling at best.

I reserve the right to submit additional comments by the closing date of 11/30/15

Response GP781-217

The address was corrected in the Draft EIS files and the updated files were reposted to the Ecology website. The U.S. Postal Service confirmed that comments addressed to Second Street would be delivered to Second Avenue. Comments addressed as such were received.

GP782, **Tlustos, Margaret**

Comment GP782-1

Grays Harbor is the wrong place for oil terminals with its narrow, shallow shipping channel and strong currents that would put it at high risk of an oil spill. A single major spill could devastate the area's maritime economy, productive fisheries, tribal treaty rights and spectacular coastal waters. I support the Quinault Indian Nation's opposition to crude oil shipments passing through lands it has lived on since time immemorial, and endangering the natural resources its people depend on for their livelihoods. There is no way to mitigate the risks and dangers of the proposed oil shipping terminals, dirty and dangerous oil trains, storage tanks and barges, so they must be prevented.

Response GP782-1

Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP783, **Tomlinson, Marc R.**

Comment GP783-1

I am a long term resident of Grays Harbor. We are active outdoor people who enjoy hiking, bird watching, fishing, etc. I am well educated in the physical and biological sciences. I own a business in Aberdeen and in general am enthusiastic about new business and jobs coming to the Harbor! It is an amazingly bad idea to contemplate bringing millions of gallons of toxic crude oil by rail to Grays Harbor!! The existing rail line goes close to our home in Central Park. That line takes quite a torturous path and is very busy as is! I was on the scene minutes after the multiple car derailment last year. Fortunately the cargo was just stinky soy meal! More rail traffic would create havoc and loss of business at the Wishkah Mall and all over downtown. More importantly, Grays Harbor is a large vulnerable ecosystem! We are home to a number of rare and pristine saltwater marshes and rivers! The associated migratory birds and fish runs need protection! We are in an area which will inevitably suffer that next huge subduction earthquake! Alaska has not yet recovered from the Exon Valdez spill after 15 years and that was one tanker! Additionally, commodities like oil are not predictable long term investments as we have seen by the recent huge drop on oil prices. In two decades we could easily end up with infrastructure that was worthless! I am a big supporter of economic growth. However, bringing in crude oil by train is idiocy! Dr. Marc and Suzanne Tomlinson

Response GP783-1

Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP784, **Treadway, Carolyn**

Comment GP784-1

I am strongly opposed to the Westway and Imperium Oil Terminals in Grays Harbor, WA, and to any transport of crude oil by rail or by sea. I care very much about the environment my children and grandchildren are inheriting, and I fear for the future of all our descendants already born and yet to come.

Climate change is accelerating across our planet, including in Washington where this summer we experienced devastating drought and forest fires. ONLY by decreasing the various greenhouse gasses in our atmosphere will we have an environment in which current species can continue to live. Fossil fuels need to remain in the ground, forever. Every single operation that supports the extraction, transport, or use of any fossil fuel contributes to the devastation of our Earth, which is our ONLY home. What right do oil companies (and subsidiary companies that service them) have to risk the precious water, air, and land that belong to us all?

All for the sake of corporate profit!! Accidents will happen, as they constantly do. Just one major spill could destroy, probably forever, a large surrounding area, and the way of life of the people (and all creatures) in the area

Increasing our use of oil is physically dangerous to our planet and therefore morally wrong. Simply wrong. Building storage terminals in an earthquake/tsunami zone--to hold millions of gallons of crude oil--is pure insanity. Increasing oil terminals and transporting oil through them is in NO way worth the environmental, health, economic, and social risks involved. Time is running out for us to re-create a sustainable planet. The era of oil is over. Energy conservation and renewable energy are the future, and are necessary if we humans are to have a future. For all these reasons and countless more, please REJECT the proposals of the Westway and Imperium oil terminals. Instead, please act to PROTECT the beautiful coastline of Grays Harbor plus all the people and communities of the surrounding area. By saying NO to these proposals, you lead the way toward a sustainable future and continued viable life on Earth.

Response GP784-1

Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP785, **Treadway, Roy**

Comment GP785-1

Dept. of Ecology & City of Hoquiam Re: Westway and Imperium Oil Terminal Proposals I am opposed to the Westway and Imperium Oil Terminals in Grays Harbor. The proposed Terminals would significantly increase transport of oil by rail throughout Washington, but particularly from

Chehalis to Aberdeen, putting at crucial risk the people, wildlife, farmland, and water along the way, especially in Grays Harbor.

From experience elsewhere, oil trains are not safe, and one spill could well destroy the economy, if not livelihood, of persons, including the Quinault Indians, who depend on the coasts, fisheries, and marvelous scenery of Grays Harbor. Why risk something so precious for the gain of a few, not only in the United States but in many other countries as well?

We have recently witnessed devastating floods elsewhere in our country and droughts and forest fires in the West, all aggravated by climate change from increasing carbon dioxide in the atmosphere from using fossil fuels. Let us not transport through Washington and Grays Harbor oil, the burning of which does so much harm to our planet. Washington and the Gray's Harbor area can lead the way to sustainable, clean, renewable energy, and not depend on supporting a risky, damaging last-century source of energy – oil. I urge you to reject the proposed Westway and Imperium oil terminals. Sincerely, Roy C. Treadway Note: This may be a duplicate of a comment I tried to submit on Oct. 6, 2015, but I am not sure if it were successfully submitted.

Response GP785-1

Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP786, **Treat, Lynn**

Comment GP786-1

Good afternoon. I'm Lynn Treat from Chehalis, Washington. I'm here to comment upon an unnecessary risk we are taking in this state. While I have many concerns about oil companies and transports of oil within our state, I want to focus on the topic of public health and how it seems to affect our area with regard to this petroleum project.

I see at least two areas of importance. The safety -- number one, is the safety of routine shipments, their ability at containment and adherence to regulations.

The poor state of our infrastructure is well known, and this includes the declining quality of our oil cars and incidents of unknown leakages of methane.

I am very concerned with the monthly disclosure of oil train accidents, and devastation. We risk, in Washington State, a tragedy on the proportions of those in Lac-Mégantic, Quebec. Emergency resources in such communities are very stretched by having to prepare for these emergencies and how to actually conduct themselves when such an emergency happens.

It is somewhat humorous to see these oil companies try to sell us this as a job creator, an asset to our economy. The entire enterprise is a tactic by oil companies to complete its final harvest to fossil fuels.

Those jobs that they are supposedly putting here will not be here in 40 years unlike Microsoft and other very valuable institutions and hirers. So there will be no one collecting a gold watch at their retirement from the oil industry.

Real entrepreneurs will find much opportunity with alternative and renewable fuels, and they'll find much more than in helping these companies, the big oil, break and drain in our resources.

Clearly the future is in renewables, and the youth, the next generation, already know this. Thank you.

Response GP786-1

Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP787, **Troyer, Stena**

Comment GP787-1

October 26, 2015 Westway and Imperium Terminal Services Expansion Projects EISs c/o ICF International 710 Second St, Suite 550 Seattle, WA 98104

Washington can be the leader for safe, renewable clean energy solutions- say NO to an oil terminal in Grays Harbor.

To whom it may concern,

For nearly three years, I have worked as an environmental educator for a nonprofit that uses education to inspire stewardship of the Puget Sound to the people of the community. This education comes in a variety of forms including interpretative beach walks, classroom science workshops, citizen science opportunities, and even a Jr Naturalist training program. In 2014 we delivered over 500 programs to over 25,000 individuals.

I find that the most rewarding parts of my job is working with students. I want to share with you that the future these students have imagined is far removed from fossil fuels. Each of the workshops we deliver connects back to the environment and gives students hands on opportunities to engage in the scientific process and devise solutions to make their world a better place. The various solutions students have to take action and reduce pollution is inspiring. Let's get the ball rolling in the right direction for these future scientists and leaders by saying no to an oil terminal in Grays Harbor.

There are better ways to meet our energy needs. Let's move away from investing in infrastructure for fossil fuels and instead, invest in clean, renewable sources so we can meet our energy needs in an earth friendly way. The time is NOW to take action to respond to climate change and dirty coal and oil is not the solution for our community and world. Please do everything you can to stop projects that promote coal and oil. We can be leaders in a future powered by safe, renewable, clean energy- let's start today.

Stena Troyer troyerstena@gmail.com 406-679-0615

PS: I urge you to consider the list on the following pages in your review of the environmental impact statement.

WA Recreational Use Study: In 2014, WA residents took an estimated 4.1 million trips to the WA coast, with nearly 60% saying the primary purpose was for recreation. Average respondents spent approximately $111.14 per trip, translating to an estimated $481 million in direct trip expenditures.

35.6% of the 4.1 million trips were taken to Grays Harbor County. Beach going, sightseeing/scenic enjoyment, wildlife viewing, and photography were the most popular activities coastwide, with some of the highest rates of activity found along the shorelines of Grays Harbor County and the ocean and estuary coastlines.

Response GP787-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2, has been updated to provide additional information about economic and social costs of oil spills, including potential impacts on businesses.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP787-2

Inadequate Assessment of Alternatives: The purpose of an EIS under the Washington State Environmental Policy Act (SEPA) is to provide our government agencies with sufficient information to make planning decisions based on environmental impact. Yet these two EIS documents fall severely short of that purpose because they do not consider any alternatives other than the no project alternative, including alternatives that would proactively strengthen the local economy and job growth, attract more tourism in the area, and reduce environmental pollution in the region.

Response GP787-2

Refer to the Master Response for Project Objective and Alternatives for an explanation of the alternatives evaluated in the Draft EIS.

Comment GP787-3

Earthquakes & Tsunamis: Both proposals are in significant earthquake and tsunami areas, as recognized in the EIS documents. An inevitable earthquake or tsunami of modest or severe size slated for the region would cause an unprecedented environmental disaster should this project go through (including significant oil spills and explosions). The mitigation proposed in the EIS does not adequately address this outcome and its destructive effects.

Response GP787-3

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation would reduce earthquake and earthquake-related events including tsunamis.

Comment GP787-4

Proposals Preclude More Sustainable Uses: The proposed fossil fuel infrastructure and uses of Washington coastline would preclude more sustainable uses in the area, such as clean energy production facilities, tourism, and recreation.

Inadequate Cost Analysis. Neither EIS includes an analysis of the inevitable increased costs to our communities and our government agencies, including:

- Increased health care costs and community illness due to air, water, soil, and noise pollution.
- Decreased commercial fishing/aquaculture returns from polluted waters and disrupted habitat.
- Decreased tourism and recreation due to less access to the coastline, waterways, and the natural resources of the area.
- Increased clean-up costs of spills, explosions, and other inevitable forms of pollution due to transport, operations, disposal, human error, and natural disasters.

Response GP787-4

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP787-5

Cumulative Impacts on Climate Change: These proposals promote the extraction, transport, and burning of fossil fuels, all of which are contributing to climate change and a host of related hazards, costs, and threats to every community, coastline and economy in the world, including our own.

Response GP787-5

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Comment GP787-6

Shorebirds & Waterfowl: Grays Harbor estuary is located along the Pacific Flyway, a migratory flight corridor between Alaska and South America. It is one of four major staging areas for migrating shorebirds in North America, with shorebirds congregating in the mudflats to feed and rest during spring and fall migrations. Aroximately 24 species of shorebirds use the Grays Harbor National Wildlife Refuge during migrations, which begin in late April and continue through mid-May. The spring migration is concentrated, with hundreds of thousands of shorebirds arriving for a brief stay during their northern migrations. Fall migrations begin in July and continue through September

Vessel Strikes: Collisions with ships are one of the primary threats to marine mammals, particularly large whales, along the U.S. west coast, and around the world. Related to the proposed action, the greatest potential for vessel strikes to occur would be in the shipping lanes, which are located outside of state water (farther than 3 nautical miles from the coast). This is because large mammals, like whales, typically migrate and forage in deeper waters and are not likely to enter the

harbor. However, there is some potential for vessels to strike marine animals within the study area, particularly during transits outside the harbor but within 3 nautical miles of the harbor mouth. Depending on the circumstances (i.e., vessel speeds, vessel type, type of animal, animal behavior), the impacts could vary widely, but could include bone fractures, organ damage, and internal hemorrhages

Response GP787-6

Potential impacts on animals, including vessel strikes, are addressed in Draft EIS Chapter 3, Section 3.5, *Animals*. The potential for widespread damage from oil spills, fires, or explosions are addressed in Chapter 4, *Environmental Health and Safety,* including impacts on shorebirds.

GP788, **Tuepker, Anais**

Comment GP788-1

Dear Consultants, Ecology and City of Hoquiam, Across the Pacific Northwest region, one community after another is rejecting the tremendous risks associated with increased crude oil shipping. Indigenous, business, and other local communities are opposed to the Westway and Imperium proposals, because of the risks and unavoidable, unacceptable costs that these projects would impose. I urge you to reject the oil terminals proposed in Grays Harbor because they will create the following significant and adverse impacts which cannot be avoided or mitigated and are unacceptable:

1)Non-yard oil train derailment spills will happen in the extended area several times per decade. An oil spill would have significant and adverse impacts that cannot be prevented or mitigated. At best only 14% of the oil is recovered in a spill. Crude oil contains benzene which cannot be recovered from the water.

Oil vapor pressure cannot be lowered enough to prevent ignition. When tank cars are punctured during a derailment, non-yard derailment spills usually lead to fire. Oil train fires are likely to cause burns, deaths, and property damage. Burns, deaths, and property damage are significant adverse impacts that cannot be prevented or mitigated.

Response GP788-1

Draft EIS Chapter 4, Section 4.5.2.2, *Fires or Explosions*, addresses potential risks related to fires or explosions associated with rail transport under the proposed action. Section 4.7, *Impacts on Resources*, describes potential impacts of fires and explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities.

Comment GP788-2

2) Until all the tank cars have thermal jackets and high capacity pressure relief valves, tank cars sitting in a pool fire, are likely to explode. Firefighters cannot protect the public in those cases. Oil train explosions will be impossible to prevent for nearly a decade.

Response GP788-2

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* discloses voluntary measures and design features, proposed applicant mitigation, and other measures that would further reduce environmental health and safety impacts from rail transport related to the proposed action, in addition to regulatory compliance and best practices. To the extent possible, within the framework outlined in the Master Response for Mitigation Framework, measures addressing the need for more coordinated and focused planning include the role of the applicant as appropriate. However, as noted, no risks can be eliminated and, depending on the circumstances, significant impacts could occur.

Comment GP788-3

3) Oil trains block traffic, interfering with commerce, emergency response and school buses. The adverse impacts will be significant. There is no practical way to mitigate for blocked traffic.

Response GP788-3

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, addresses potential impacts on vehicle delay and emergency vehicle access. Final EIS Section 3.16 clarifies proposed mitigation and potential significant and unavoidable impacts.

Comment GP788-4

4) On some days the oil terminal will stink, particularly if the vapor combustion units fail. The city of South Portland Maine has banned the trans-loading of crude oil into marine vessels for that reason. Hydrogen sulfide first deadens the sense of smell, and then it kills you when it gets trapped in low-lying pockets.

Response GP788-4

Final EIS Chapter 3, Section 3.2, *Air*, reflects the addition of a discussion of potential impacts related to odor. The only compound with sufficient emissions to have the potential to have a perceptible odor is hydrogen sulfide. The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, are expected to reduce emissions of air pollutants, including hydrogen sulfide, to below the odor threshold for the most sensitive individual.

Comment GP788-5

5) An oil terminal can only begin the slide toward altering the landscape, river, and quality of life here. There will be no other direction once it begins. [*7*] The construction unions in Texas oil towns have been starved to death. And once they've got their foot in the door, big oil is as happy as any other corporation to break unions. The prosperity we're being offered is a poison pill. This cannot be mitigated or avoided.

Response GP788-5

Comment acknowledged.

Comment GP788-6

6) Finally, the proposed oil terminals will lead to a net increase of greenhouse gas emissions. If all the terminals in Washington and Oregon are approved, the net global oil production could increase 496,000 barrels per day. This is additive. This is not simply replacing one oil source for another. The increases must be mitigated.

We can lead (and profit from) the transition to a clean energy future, which will come, or we can fall behind in our dependence on dirty projects and dirty money. Don't approve these projects - the cost to our present and our future is too high.

Response GP788-6

Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and for information on the likely destinations of crude oil shipped through the proposed facilities. Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP789, **Tuyls, Gar**

Comment GP789-1

My name is Gar Tuyls of Portland, OR. My Masters degree is from Oregon State University for Environmental Health & Safety Education. In the past 4 years I have traveled twice to Wisconsin via Amtrak. In 2011 the east bound Amtrak was stopped on a sidetrack numerous times to allow west bound oil freighters to pass. In 2014 the side tracking was more frequent than 2011. Also, on one such passage around midnight most passengers were asleep. The rocking of our train was so severe that it woke myself and other passengers. The rocking seemed that a collision between the trains was imminent. The tracks and the bed seemed about to fail. Now an accident of this nature is an occurrence that happens all too frequently. If either the track or rail bed had failed it could have resulted in the deaths of all those aboard both trains. I am sure that there are other sections of the track or roadbed in as bad or worse repair. Please do not jeopardize public transit safety for an industry that is currently unsustainable at its given rate of resource mismanagement. What will be done to mitigate the possibility of such a train wreck? Thank you. Respectfully, Gar Tuyls.

Response GP789-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not

completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For more information about the analysis of potential impacts on the BNSF main line, refer to the Master Response for the Geographic Scope of the EIS.

GP790, **Tuyls, Gar**

Comment GP790-1

My name is Gar Tuyls of Portland, OR. My Masters degree from Oregon State University for Occupational and Environmental Health & Safety Education has prepared me well to respond to the Westways/Imperium Terminals proposal. In my estimate the biggest problem of utilizing the proposed site is liquefaction. We in the Northwest are totally unprepared for the eventuality of 9.0 earthquake followed by the tsunami. The Japanese earthquake of 2011 that destroyed a nuclear plant and caused a meltdown was 9.0 Richter. There likely be much destroyed, including tank farms and pipelines. To what standards will the tanks be designed to withstand such devastating energy release as from the slip of the Cascadia subduction zone? May I politely suggest current Japanese standards. Finally, Looking at Gray's Harbor from an aerial view it is evident due to topography that given past construction standards will be woefully inadequate, particularly tank farms and underground pipelines. The only safe areas will be well east of the Olympic Peninsula, this does not include Seattle as being safe. As a matter of National Security I request you deny the Westway and Imperium Terminals applications. Thank you, Gar Tuyls

Response GP790-1

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP791, **Tuyls, Gar**

Comment GP791-1

My name is Gar Tuyls of Portland, OR. My Masters degree from Oregon State University for Occupational and Environmental Health & Safety Education has prepared me to respond to the Westways/Imperium Terminals proposal. Noise Mitigation was part of my study curriculum and used in my professional career. In particular, is noise/vibration from any pile driving to be done. Pile driving has been used to secure storage tanks in Japan subsequent to their 2011 9.0 earthquake and tsunami in Fukushima Prefecture. The Tribal Fact Sheet states in part, "construction not likely to harm fish or wildlife". After reviewing available data provided , specifically Construction-Noise-Pile driving on the Fact Sheets there appears to be a missing component. No mention is made of the

effect of pile driving noise/vibration and energy release into Grays Harbor. I refer you to this article published By Jackson Kuhl, For National Geographic News. PUBLISHED Thu Feb 09 12:03:00 EST 2012. "In 2003 and 2004, the California Department of Transportation (Caltrans) needed to drive new pilings—8 feet (2.44 meters) in diameter and 300 feet (91.44 meters) long—into the seabed for the project. Caltrans was concerned that the short, powerful pressure waves created by the enormous hammers striking the pilings would affect the behavior of nearby seals. Bud Abbott of Oakland, California, a marine biologist consulting on the project, warned the waves might kill fish as well. ....during an early test, a number of dead fish appeared on the surface. Abbott collected the fish and conducted necropsies. The swim bladders of the fish had burst and their kidneys had suffered terrific damage. Abbott's verdict: The pressure wave compressed the air in the swim bladder, which then quickly expanded again, bursting the bladder and damaging the kidneys." There is much more scientific evidence, one is attached, of the difficulty of mitigating impact to sea animals from high noise/vibration from pile driving construction. If unmitigated the entire bay and could become devoid of all seal life. Those animals that could flee would likely do so. Those with limited mobility would likely perish. My request is the Board please review and consider disapproval of the applications currently being considered in the Westways & Imperium DEIS's due to the issue of ecosystem damage to Grays Harbor. Respectfully submitted, Gar Tuyls

[Attachments: Development of an air bubble curtain to reduce underwater noise of percussive piling. Marine Environmental Research, 2000.]

Response GP791-1

The proposed action would not require any in-water pile driving; therefore, potential underwater noise and pressure impacts on aquatic species from in-water pile driving are not addressed in the Draft EIS. Pile driving outside of but near surface waters could have impacts on aquatic species if the pile driving is close enough to the water. These potential impacts are addressed in Draft EIS Chapter 3, Section 3.5.5.2 *Proposed Action*, *Construction*, *Noise*. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP792, **Upenieks, Roland**

Comment GP792-1

Dear Consultants, Ecology and City of Hoquiam. We urge you to reject the oil terminals proposed in Grays Harbor because they will create the following significant and adverse impacts which cannot be avoided or mitigated and are unacceptable.

The tank cars cannot be made crashworthy. Non-yard oil train derailment spills are guaranteed to happen in the extended area several times per decade. An oil spill would have significant and adverse impacts that cannot be prevented or mitigated. At best only 14% of the oil is recovered in a spill. Crude oil contains benzene which cannot be recovered from the water.

Response GP792-1

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* presents the analysis of risk of oil spills, fires, and explosions related to rail transport related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Section 4.5.3 that would reduce the likelihood of a spill reaching the environment and

the potential impacts of an incident along the PS&P rail line. Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including a discussion of the potential longer-term impacts. Final EIS Section 4.3, *Risk Considerations,* reflects additional information about factors influencing cleanup.

Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP792-2

2. The oil vapor pressure cannot be lowered enough to prevent ignition. When tank cars are punctured during a derailment, gases rush out and find a spark. Non-yard derailment spills usually lead to fire. Oil train fires are likely to cause burns, deaths, and property damage. Burns, deaths, and property damage are significant adverse impacts that cannot be prevented or mitigated.

Response GP792-2

Draft EIS Chapter 4, Section 4.5.2.2, *Fires or Explosions*, addresses potential risks related to fires or explosions associated with rail transport under the proposed action. Section 4.7, *Impacts on Resources*, describes potential impacts of fires and explosion.

Comment GP792-3

3. Until all the tank cars have thermal jackets and high capacity pressure relief valves, tank cars sitting in a pool fire, are likely to explode. Firefighters cannot protect the public in those cases. Oil train explosions will be impossible to prevent for nearly a decade.

Response GP792-3

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* discloses voluntary measures and design features, proposed applicant mitigation, and other measures that would further reduce environmental health and safety impacts from rail transport related to the proposed action, in addition to regulatory compliance and best practices. To the extent possible, within the framework outlined in the Master Response for Mitigation Framework, measures addressing the need for more coordinated and focused planning include the role of the applicant as appropriate. However, as noted, no risks can be eliminated and, depending on the circumstances, significant impacts could occur.

Comment GP792-4

4. Oil trains block traffic. They interfere with commerce, emergency response and school buses. The adverse impacts will be significant. There is no practical way to mitigate for blocked traffic.

Response GP792-4

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, addresses potential impacts on vehicle delay and emergency vehicle access. Final EIS Section 3.16 clarifies proposed mitigation and potential significant and unavoidable impacts.

Comment GP792-5

5. The proposed oil terminals will lead to a net increase of greenhouse gas emissions. If all the terminals in Washington and Oregon are approved, the net global oil production could increase 496,000 barrels per day. This is additive. This is not simply replacing one oil source for another. The increases must be mitigated. The data was provided by Oil change International which performed a similar study on the KXL pipeline for the EPA. http://www.sightline.org/research_item/tracking-emissions/

Response GP792-5

Refer to Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and for information on the likely destinations of crude oil shipped through the proposed facilities.

Comment GP792-6

6. Lost property values More than reported in the Economic Impact Analysis Planning model used by ECONorthwest. That model doesn't distinguish between unit oil trains and other types of freight. These adverse impacts are significant and cannot be mitigated or avoided.

Response GP792-6

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

Comment GP792-7

7. The Cost of Emergency Preparedness in all rail communities. NTSB says emergency response planning along the rail routes is "practically nonexistent".

Response GP792-7

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities in the study area. For more information about the analysis of potential impacts on the BNSF main line, refer to the Master Response for the Geographic Scope of the EIS.

Comment GP792-8

Spill Cleanup delays. It took decades for the spill to be cleaned up in the town of Skykomish. Buildings had to be moved. The delays were significant and are unlikely to be avoided in the future. http://skykomish.wednet.edu/news/2015/03/13/school-clean-up/

Response GP792-8

Comment acknowledged.

GP793, **Van Doorninck, Anneka**

Comment GP793-1

We were actively involved in the cleanup of the Nestucca oil spill in 1989 in Grays Harbor The list of similar incidents is growing. Some resulting in loss of life like at Lake Megantic in Quebec. Did we learn from these incidents?

We hope so and unless safety issues are much more seriously discussed, we urge you to prevent further disasters by denying the permits for an oil harbor in Hoquiam,

Response GP793-1

Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP794, **Vanderpool, Nancy**

Comment GP794-1

No oil trains allowed in the Columbia Gorge nor through Oregon and Washington.

Response GP794-1

Comment acknowledged.

GP795, **Vassilakis, Noemie**

Comment GP795-1

Expansion of these oil storage terminals is taking us in exactly the wrong direction. We urgently need to move away from dirty, carbon-intensive energy sources. We also should not be routing coal and other energy transportation through our region as the coal dust, oil spill risks, additional traffic, and other impacts that will result are bad for our environment and quality of life. I oppose these expansions.

Response GP795-1

Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP796, **Vicki**

Comment GP796-1

While I understand that the Grays Harbor area is economically distressed, I believe that these expansions are a bad idea. They are not expansions of activities already being conducted at these two facilities, they are changing them to oil terminals which brings many dangers to our environment. The dangers are not limited to Grays Harbor, but would impact all of Western Washington and our entire planet. Our focus should be on clean energy, not finding ways to move more oil across our state. We should not let the oil industry beguile us with the promise of short term jobs for people in one area at the expense of the whole planet.

Response GP796-1

Refer to the Master Response for the Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP797, **Vicki**

Comment GP797-1

How is this project a good idea? I've heard that the location of it is very prone to earthquake damage. Also, it doesn't seem like many people in the area are in favor of it. Not to mention the environmental damage. I am not in support of this project.

Response GP797-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP798, **Vidal-Hallett, Emilia**

Comment GP798-1

How is this project a good idea? I've heard that the location of it is very prone to earthquake damage. Also, it doesn't seem like many people in the area are in favor of it. Not to mention the environmental damage. I am not in support of this project.

Response GP798-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP799, **Vogel, Sally**

Comment GP799-1

Good afternoon

My name is Sally Vogel, I live at 4319 Chambers Lake Dr. SE, Lacey, WA 98503. I am here representing myself and my friends and family.

I appreciate that fact that you are here willing to listen to all of us. My testimony will address the impact of the project upon the climate.

Building storage facilities for oil is like enabling an alcoholic. It encourages greater extraction of a dangerous substance. Others will address the overwhelming safety issues involved here, so I thought I would speak to the issue of climate change.

In the EIS it is stated that the proposed project will increase greenhouse gasses by only 0.033 percent compared to Statewide Greenhouse Gas Emissions in 2011. It is easy to look at this and think ...oh, that's not much. But we are already at TOO MUCH. We must not build projects that add anything to the creation of greenhouse gasses.

We can't look at this one project in isolation from the others that are proposed. The tendency of us all is to look at the percentage of increase of Greenhouse Gasses this one project would cause and dismiss it as not having much effect. That is a dangerous path to take. Climate change didn't come about all of a sudden; the gasses accumulated incrementally. Permission is given to pollute because any o e project is not seen as a danger. THAT IS THE DANGER. It all adds up.

It has added up so much that South Carolina just experienced unprecedented flooding, southeast China has had unprecedented tornados, glaciers are melting all over the planet and here in Washington, we are experiencing a rare thing for us...drought...because it is too warm to snow.

Climate change brings negative impacts to our health, our safety, the economy and our quality of life. It affects every aspect of life.

There is a path to slow and possibly reverse climate change. One component of it is to Say NO to every project that involves taking sequestered carbon from its place and every project like this one, that enables it. Leave it in the ground. Leave it in the trees. Don't truck it, pipe it, take it by rail or by tanker ...leave it where it is.

Yes, I drive a car, yes I enjoy a better way of life because of petroleum products...but the consequences of continuing my lifestyle... and yours are too awful to contemplate. That better way of life can become horrible if we don't do something. NOW. I'm willing to change my habits. Are you willing to say NO to this project? Please deny the permit.
Thank you.

Response GP799-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP800, **Voget, Connie**

Comment GP800-1

As a member of the Green Team at my church, Keystone United Church of Christ, I oppose oil-by-rail projects. I am particularly concerned about impacts on Native Americans.

Response GP800-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP801, **Voget, Connie**

Comment GP801-1

Name Connie Voget
City/State/Zip Seattle, WA 98103

I request that the risk of cancer, asthma, and other respiratory illnesses from diesel particulate pollution emitted by oil trains be evaluated. Being a cancer survivor, I am more aware than many about the toll a cancer diagnosis and treatment takes not only on the patient but also family and friends. Knowing people with asthma and other respiratory illnesses, I am aware of the debilitating effects and suffering induced by these illnesses and feel compelled to speak out against elevating risks of these illnesses.

Response GP801-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant.

GP802, **Voget, Richard**

Comment GP802-1

This is the wrong place for oil terminals. The Washington State Department of Fish and wildlife stated "Grays Harbor is an area particularly sensitive to the adverse effects of oil spills." Much of what makes Grays harbor special would be at risk. The narrow, shallow shipping channel and strong currents put Grays Harbor at High risk of an oil spill. A single major spill could devastate the area's maritime economy, productive fisheries, tribal treaty rights and spectacular coastal waters.

There is no safe way to move oil by train: The tank cars that split open and burst into flames in Illinois in March 2015 were retrofitted to meet a higher safety standard than federal law requires according to railroad officials. The oil cars that derailed in West Virginia in February 2015, leaking

oil into the Kanahwa River and burning down a house, were the newer 1232 cars that were supposed to be safer than the older DOT-111 models blamed for previous accidents.

Response GP802-1

Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and that all existing tank cars be retrofitted in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 Federal Register 26643). However, as noted in Section 4.5.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport?* the risks cannot be eliminated.

Comment GP802-2

Increased rail traffic would almost double the emissions of pollutants from rail transport in the county. Most of the diesel pollution from oil trains would be emitted near homes and businesses on a small section of tracks between Poyner Yard and the Westway and Imperium sites.

Response GP802-2

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant.

Comment GP802-3

There is a better way to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming. Building more, big infrastructure for yesterday's energy is the wrong path to meet today's energy needs. Climate scientists have calculated that at least 70% of the known fossil fuel reserves need to stay in the ground and not be burned if our children and grandchildren and their children are to live in a climate that is safe and healthy. This proposed project will worsen global warming because even more oil will be burned. To knowingly contribute to a problem is morally wrong. Help preserve a safe and healthy future climate by denying the oil terminals.

Response GP802-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP803, **Voget, Richard**

Comment GP803-1

For the sake of our children's ability to live in a safe and healthy climate, 80% of the known fossil fuel reserves need to stay in the ground. Approving oil shipping terminals will only increase the burning of oil... a step in the wrong direction.

Response GP803-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP804, **Vogt, Max**

Comment GP804-1

My concern is about the trains carrying the oil to these storage facilities and terrorism. Have the oil train cars been secured for terrorist attacks? Will they take a bullet from a high powered rifle for instance and be able to protect the oil from exploding? There are thousands of miles of unprotected tracks throughout the US and these highly flammable liquids carried in these cars need to be protected. What about teenagers taking pot shots at these cars which is common to do in rural areas? IF it is possible to ignite one of these cars by shooting at them, then no special plans or technology needs to be used by terrorists to explode one. Just a gun.

Response GP804-1

Draft EIS Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and that all existing tank cars be retrofitted in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643). However, as noted in Section 4.5.4, *Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport?* the risks cannot be eliminated.

GP805, **Walberg, Patrick**

Comment GP805-1

Hello, my name is Patrick Walberg from Montesano, Washington. I'm here tonight to ask you to deny these permits. The risks are all that I have to say. The risks. There are so many risks bringing this oil to Grays Harbor that it is not worth it.

The risk of bringing it down the Columbia through the Chehalis through all the sanctuaries through the Chehalis. All it will take is one time for one of those tanks to tip over and we're done. Fishing is over.

This is not a complicated matter here. You're going through your process. You're doing your process. I appreciate that. But this is no. This is no. Did anybody see what happened in Lac-Megantic? I saw the videos of that within hours. It was horrifying. These are bombs that are coming down the tracks.

These are not oil trains, these are bombs. There is nothing good about this. This is insane. I'm sorry to use the word but it is insane to bring these oil trains to this harbor on a soil that if there was an earthquake, it's gone. It's done.

Yeah, I'm a little excited about this because I have lived here all of my life. I'm going to stay in this place all my life. But I may change that. That may change. If these oil trains come to Grays Harbor, I might have to move. I live within a half mile of the tracks in Montesano. If one of those go off, we're done. Montesano is gone. It's not worth it. It is not worth it.

Response GP805-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP806, **Waldorf, Elizabeth**

Comment GP806-1

Evolution has created an incredible, intricate, beautiful Earth on which we lead lives enriched by nature. To protect future generations if we are wise we must protect this wealth of beauty. To put our extraordinary home at risk for private, out of state companies to exploit and profit, is crazy.

Response GP806-1

Comment acknowledged.

GP807, **Waley, Valerie**

Comment GP807-1

I live in Spokane WA. It has the only rail system that handles the transport of crude oil and dirty coal entering Washington after which the trains then split into different directions. The trains that handle these dirty fossil fuels also goes thru Sandpoint ID before reaching Spokane. One rail system handling not only the 72 million gallons of oilthat would be stored at the two proposed terminals, but think of the millions of oil that comes across the rail system going to other terminals, ports, refineries. Plus the undue stress of the rails themselves to not only handle the increased volume of just the dirty fossil fuels but passenger and other commodities that depend on our rail system.

Oil trains spills hit record levels in 2014. In 2013 more oil spilled from trains into rivers, lakes, and marine waters than in the previous forty years combined.

China has announced their plan to move toward more green energy. Weren't they one of the major countries that wanted our dirty fossil fuels to begin with, starting with Powder River Basin dirty coal? Plus all those megaloads that went thru not only Spokane city streets but other smaller communities to be implemented in the Bakken Crude Oil fracking. Which both the fracking in Pine Ridge SD and Wyoming's coal mining produces fossil fuels that just to refine them are not allowed

under U.S. regulations. I live in the blast zone of a train derailment, which is an accident just waiting to happen. More than that, the fact the the train tracks run right thru downtown Spokane are a stone's throw from schools, and very, Very close to two hospitals and many medical facilities. Plus with all the buildings where people reside, and so much more. I haven't even commented on the pristine areas that these rails run thru. Nor the damage not only to people but land, wildlife, rivers, aquifers, and More. Please DO NOT allow these terminals in. We, as a society, really need to look to alternative energy and not keep destroying our beautiful land for a resource that's close to depletion and does So much harm in So many ways. Thank you for your time Valerie Waley

Response GP807-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP808, **Walker, R.P.**

Comment GP808-1

October 8, 2015

To the Washington Dept. of Ecology,

I present this letter to you in an effort to caution you as you grapple with issues surrounding the "crude-by-rail" program being proposed for the Grays Harbor port facility. As is the case with every proposed hydrocarbon energy project, there are a wide variety of issues that require close scrutiny but few municipality managers can be expected to possess all the necessary expertise to comprehend the myriad of issues that are so tightly intertwined.

My goal with this letter is to provide a set of observations and recommendations for actions you might consider taking to evaluate preparedness issues that must influence the decisions being made by port authorities and participating state agencies.

I first should describe my own credentials. I am a retired U.S. Air Force officer, who served half of that career as a physicist and nuclear engineer. In that capacity, I was involved in a variety of high science and engineering projects. I am currently a relatively new resident of Westport, having "emigrated" here from my native state of Wyoming. During the period between 2003 and 2011 in Wyoming, I became involved in applying independent science research-based challenges toward state and federal regulators, federal land stewards, environmental organizations, and companies streaming into my home area of Sublette County to develop, at break net speed, the enormous natural gas reserves there. I did so by drawing upon my science background to challenge the way industry, utilizing state and federal regulatory complacence, was systematically ruining air quality in a county that had enjoyed pristine air but subsequently has seen ozone levels exceeding those of Los Angeles. My field research has resulted in my having published technical papers, I have been extensively interviewed by a book author on the subject of censorship of public input on energy

development through administrative delaying tactics, and I am now writing my own book about my experience in Wyoming.

Over an eight-year period, I grappled with industry and government, and I learned hard lessons about what should be asked, up front, of regulators and proponents and how to ask it. As I listened to the presentation given by Imperium on the evening of Nov. 12, 2013, I saw in play the very same dynamic that was and still is in play in Wyoming and other regions where gas, oil, and coal are waiting for development or being transported. The operators (natural gas developers call themselves that) made many wonderful sounding economic promises and offered many reassuring regulatory references. Over time I learned that a listener must pay attention to what is not said and to probe for what is likely missing from the picture.

In town hall meetings, Imperium emphasizes that its industry is among the heaviest regulated in the nation. Unfortunately, all the permits that have been issued for this project may only signify that the permitting agencies have accomplished their book keeping requirements dictated by law. Permits, by themselves, do not assure accident free operation of the proposed oil trans-shipment program ..... only strict oversight, inspection and enforcement can do that. This in turn begs the question "what staff commitment and level of funding are the responsible agencies willing and able to bring into the effort?" This is where the operators should be required to provide funding since it is introducing this elevated hazard to the harbor area. Also, what level of in-house expertise is present in those agencies? It is common for such agencies to rely upon the very industry being watched for technical data and compliance reporting.

Previously, a Mitigated Determination of Non-significance (MONS) had been challenged because of perceived weaknesses in impact assessments. It is justifiable to view the "non-significance" inference as being suspect because the proposed project will likely result in major significance when the first inevitable oil spill happens ... and it will happen because human industrial activity is imperfect. It perhaps should be asked: Who made the determination? What criteria were applied? What political pressure was present and in what form to advocate issuance? Did consideration include resources and preparedness criteria to address mishaps? What level of expertise does the Dept. of Ecology possess to assure credible participation? Were any other effected municipalities allowed to participate in the permit issuance discussions? In short, was this process fast tracked because of illusionary economic benefits?

Response GP808-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of the development of the EIS and how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP808-2

Regarding those benefits, consider the trade-off between the operators' asserted creation of a comparatively handful of new jobs in the area versus the likely ruin of a shellfish industry worth thousands of jobs when a large spill accident occurs. I am informed by the Washington Crab Fishermen's Association that its industry produces on the order of $160 million in direct and indirect benefit to the harbor area. What direct and indirect benefit will trans-shipment of bulk oil produce?

Is it logical to risk the addition of oil industry jobs versus the impact of having a major spill indefinitely idle all of the jobs connected to the fishing fleet and thereby cripple the financial underpinnings of the Grays Harbor community? Also, don't forget the sport fishing industry, and the tourism industry. Learn from the Gulf Coast BP spill experience.

Response GP808-2

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP808-3

In the end, you may conclude that the crude-by-rail project will in fact be good for Grays Harbor, that the environmental possibilities are manageable, that regulatory agencies are in fact exhibiting due diligence, that all of those agencies are cooperating toward a safe and worthwhile goal, that the advertised new jobs are better than none, that risk analyses have been conducted and are credible, and that all possible due diligence by all participants has been exercised to its practical limit. Whatever your decision and actions, hopefully they will be founded upon sound information. To that end I have crafted a checklist of questions designed to measure spill event preparedness that might prove useful in guiding your search for facts. It is attached hereto.

Sincerely,
R.P. Walker
Physicist/Nuc. Engr.
Major, USAF (Ret)

Westport, WA
Ph. 268-7341
rpwalker@wyoming.com

cc: Pres., Wash. Crab Fishermen's Assoc.

Attach. 1: Spill Event Preparedness Checklist

[Attachment: Spill Event Preparedness Check List]

Damage to this area from an oil spill which has a high probability of occurring woudl be detrimental not only to wildlife but to the human community. Remember not too long ago what happened in the Santa Barbara area after that oil spill? We enjoy visiting the Grays Harbor Wildife Refuge and spend money in the area doing so. Where else can you see 4 bald eagles within a short distance of each other as we did on our last visit? Please protect this area and do not allow the oil terminals. Thank you for listening.

Response GP808-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP809, **Wallace, Nadine**

Comment GP809-1

Please do not allow these oil terminals. An almost certain oil spill to the delicate environment in the Grays Harbor area would be disastrous, and that is an understatement. The damage to the habitat of the marshes, oyster beds, mud and sand flats and other areas would greatly harm already struggling species who either are on the endangered species list, or have been designated as of great concern such as the Western Grebe, Marbled Murrelet and the Common Loon. Migratory birds rely on this crucial area which is listed as a site of hemispheric importance by the Western Hemisphere Shorebird Reserve Network. This area has one of the largest seal-pupping areas in Washington State. This area is home for large concentrations of forage fish, crabs, oysters, clam, sturgeon and lampreys. Damage to this area from an oil spill which has a high probability of occurring woudl be detrimental not only to wildlife but to the human community. Remember not too long ago what happened in the Santa Barbara area after that oil spill? We enjoy visiting the Grays Harbor Wildife Refuge and spend money in the area doing so. Where else can you see 4 bald eagles within a short distance of each other as we did on our last visit? Please protect this area and do not allow the oil terminals. Thank you for listening.

Response GP809-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP810, **Walsh, Rebecca**

Comment GP810-1

My concerns are regarding the permits for crude oil terminals in Hoquiam, WA, the subsequent trains carrying Bakken crude oil through populated areas of Aberdeen and Hoquiam, and the shipment of this oil on vessels in Grays Harbor waters. My focus is the public health and environmental issues related to these activities. I am questioning in particular what will be done to mitigate the hazards to human health. #Increased oil train traffic will block emergency medical service(EMS) access to the Olympic Gateway Plaza in Aberdeen typically for 35 min. Critical response time for cardiac arrest is <10 min. to avoid death or permanent brain damage. Other critical EMS response needs include, stroke, heart attack , or major trauma. Mitigation for these problems is imperative.

Response GP810-1

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas

blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

Comment GP810-2

#These projects will worsen air pollution through increased diesel particulate matter (DPM) and other toxic pollutants like benzene, formaldehyde, and toluene at the work site. Train engines also emit DPM. DPM and other pollutants increase the the risk of cancer, respiratory disorders including asthma, COPD, impaired pulmonary development in infants and children, heart attacks, stroke, systemic inflammation, and overall risk of disease and mortality. Infants and children will be particularly vulnerable to increased risk of a respiratory death. NOx is estimated to be the most concerning air pollutant and is primarily released by train and vessel traffic. It is a key component of smog and is associated with significant airway inflammation, respiratory disease and asthma attacks, increasing hospitalizations and potential for death.

Response GP810-2

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources. Draft EIS Chapter 3, Section 3.2, *Air*, presents emissions estimates of criteria and toxic air pollutants from onsite operations. Considering background concentrations, onsite emissions of criteria pollutants would not cause an exceedance of national ambient air quality standards. Emissions of toxic air pollutants related from onsite stationary sources would be below the state thresholds identified in WAC 173-460-150. As described in Draft EIS Section 3.2, these emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources.

Section 3.2, *Air*, presents an analysis of cancer risk from emissions of diesel particulate matter related to the proposed action, including emissions from offsite rail transport. Final EIS Section 3.2 has been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant.

Comment GP810-3

#Train derailments have occurred in this area and will likely occur again. An accident secondary to major derailment with fire and explosion of the Bakken crude close to the populations of Aberdeen and Hoquiam could result in many deaths, the U.S. DOT estimates perhaps 200 deaths with a significant social and economic impact. First responders to such an incident would be put at health risks including burns, smoke inhalation, and toxic exposure to crude oil. In addition crude oil fires would release particulates in the smoke which are a serious public health risk and can't be completely eliminated to much of the Grays Harbor population, depending on the location and prevailing winds.

Response GP810-3

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action, which includes those that could occur during rail transport. As noted in Draft EIS Chapter 4,

Environmental Health and Safety, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms and has been revised to more fully describe the potential human health impacts. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP810-4

#Oil spills health impacts on both land and water include increased risk of neurotoxicity, cancer, lung disease, loss of cognitive function and endocrine disruption in humans. A crude oil spill in Grays Harbor and the Washington coast would contaminate primary sources of seafood consumed by residents. Oil spills from trains also risk contamination of drinking water for populations along the rail route.

Response GP810-4

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Final EIS Section 4.7, *Impacts on Resources*, has been revised to more fully describe the potential human health impacts that could occur as the result of an oil spill, fire, or explosion. Final EIS Sections 4.4.3, 4.5.3, and 4.6.3 present additional mitigation measures to address these risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP810-5

Aberdeen and Hoquiam are within a tsunami inundation zone if an earthquake happens in the Cascadia subduction zone. The oil tanks will not have pilings in bedrock, thus increasing their potential for catastrophic failure with an oil spill into Grays Harbor.

Response GP810-5

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP810-6

#Another concern is the negative health effects from noise caused by trains horns. These sounds are of significant decibel strength to disrupt sleep, and to trigger heal issues such as increased cardiovascular events including myocardial infarction and arrhythmias associated with nighttime noise and noise greater than 90 decibels. Mitigation for this would be difficult because quiet zones could lead to risk of collisions and serious accidents.

Response GP810-6

The focus of the noise analysis in Section 3.7, *Noise and Vibration*, is on day-night average sound level (L_{dn}) for locations where people sleep. Daytime loudest-hour noise levels (in terms of L_{eq}) were not analyzed because the loudest hour at grade crossings and wayside locations would generally be characterized by a single train passby, which would be unchanged from existing conditions. The analysis uses the Federal Railroad Administration adopted noise assessment methods developed by the Federal Transit Administration. Implementation of a quiet zone is subject to Federal Railroad Administration approval and would include measures to maintain the level of safety while reducing noise.

Comment GP810-7

#Last but not least, climate change is a major emerging threat to human health. Climate change in our region is anticipated to result in increased heat-related illness, increased allergies, health care costs, and extreme weather events. Warming will allow mosquitos and other disease vectors to move into our area potentially increasing infectious diseases. According to the DEIS, these 2 terminals will release annually approximately 74,000 metric tons of CO2. What mitigation is possible and will be done to prevent these problems. Likely nothing can be done.

Response GP810-7

Draft EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, describes the projected impacts of climate change in the Pacific Northwest. Final EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport from most likely crude oil source to furthest likely final destination, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively. Refer to Chapter 3, Section 3.2.7.1, *Applicant Mitigation*, for proposed mitigation measures for air quality and greenhouse gas impacts.

GP811, **Wang, Art**

Comment GP811-1

I am President of Tahoma Audubon Society and a Board Member of the National Audubon Society. Both Tahoma Audubon and Audubon Washington have already provided comments on the EIS's,

with which I agree. However, I want to add my concerns individually. On a global basis, climate change threatens the world and is the single greatest hazard to species of birds in North America. We should not be contributing to the problem by exporting oil. On a local basis, this is simply a terrible location for exporting oil. Grays Harbor is a rich and precious site for migrating shorebirds, especially populations such as enormous numbers of Dunlin and concentrations of many of the Red Knots that migrate along the Pacific Flyway. One of the sites is literally next door to the Bowerman Basin and Grays Harbor National Wildlife Refuge. We should not be risking these populations with oil shipping facilities. No matter how the oil industry has assured us that safeguards are in place, history is replete with unexpected things that have gone wrong. The problem is that the consequences of an error are extremely high in the confined sensitive area of Grays Harbor. Yet another hazard is transportation of oil, both by rail on a spur with no current experience of heavy industrial use (and next to drainages leading to Grays Harbor) and by tanker across the bar at the entrance to Grays Harbor. In short, we should not permit the proposed facilities because of the hazards they pose.

Response GP811-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP812, **Ward, Marian**

Comment GP812-1

Westway/lmperium Hearing: October 8, 2015 Aberdeen, WA

There is currently no such thing as a safe oil train. These proposals to bring crude oil on trains that are over a mile long on miles and miles on tracks that are extremely problematic and unsafe in many places, threatens the safety of millions of people along the route.

I see no evidence that there are any evacuation plans in place for populations all along the route from the Bakken oil fields to Grays Harbor. When an oil train derails (and it will), fires and explosions are a likely result and people are generally evacuated 1/2 mile on either side of the track (which translates to one mile in diameter). Last year there were 3 derailments on the same track that will be carrying this oil ... fortunately the trains were carrying ·grain and did not impact the safety of people near the tracks.

The trains will traverse the Columbia River Gorge National Scenic Area and threaten livelihoods of tribal members, recreational opportunities in two states, tourism, entire ecosystems, and the flora and fauna all along the route.

Because it does not seem possible to mitigate derailment possibilities and because there are no evacuation plans in place all along the route, I urge you to deny these permits.

Marion Ward
735 SW St. Clair Ave., Apt. 1610 Portland, OR 97205

Response GP812-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the

reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP813, **Warren, Richard**

Comment GP813-1

My name is Richard Warren. I have a master's degree in geology from Princeton University. After extensive reading about climate change, I too concluded that global warming is a huge threat to civilization. Like many residents of "the funnel" in North Idaho, I am also concerned about the terrible effects an oil spill could have on the communities along the way from North Dakota to Washington. Doubtless, the burning of fossil fuels is a major contributor to global warming; but other pollutants besides CO2 are pumped into the skies at the same time, crossing the North Pacific Ocean from China to the US, as shown by UW atmospheric chemist Dan Jaffe in the 1990's. David Streets at Argonne National Laboratory in Illinois estimated that China produced 590 tons of mercury in 1999. Nearly half came from the smelting of metals, especially zinc. 38% more came from coal fired power plants. Streets said these emissions from China grew 5-6% a year, to 767 tons in 2003. Hans Friedli, chemist for the National center for Atmospheric Research, showed in 2001 that mercury plumes sampled off the coasts of China and the Pacific Northwest had the same source. In 2004 Jaffe found that 1400 tons of mercury was coming to the Northwest annually from Asia. When this mercury gets into the air, it gets into the food chain, and into American's blood, 90% as methyl mercury, which can effect fetal development in humans and can lead to lower IQ in children. Dan Laks, neuroscience researcher at UCLA analyzed data on thousands of American women collected by the CDC from 2000-2006. Inorganic mercury jumped from 2% of women tested to 30% of women tested in just 6 years. Besides mercury's neurotoxicity, there is evidence for its association with Parkinson's disease, Alzheimer's and ALS. The EPA estimated that only one quarter of US mercury emissions from coal- burning power plants lands on the continental USA. Satellite data for the Northwest shows that most of the mercury we experience here comes from China. We have the technology to put into place alternative energy sources on a massive scale. We lack the political will. Other nations, for example Denmark, are ahead of us, producing 39% of their electricity from wind turbines in 2014. The USA should not bow to Big Oil & Coal, whose interest is profit. This year it was revealed that EXXON did extensive research on the effects of CO2 on climate, beginning in the 1970's. Their team told high level executives that climate would be in trouble if CO2 production weren't curtailed. Instead of getting on board when NASA climate scientist James Hansen warned Congress of our peril in 1988, EXXON chose to delay action, saying that more research was needed. We could have had a 30 year head start on combating global warming had it not been for this reversal. Now we must work to save Earth and human civilization itself. People need jobs to house their families, but not at the expense of their health and environment. As famous American Henry David Thoreau said long ago: "Of what use is a house, if you haven't got a habitable planet to put it on?" Please, deny permits for the Westway and Imperium expansion projects.

Response GP813-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in

the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP814, **Warren, Richard**

Comment GP814-1

Good evening. My name is Richard Warren, and I live in Sandpoint, Idaho, just a little bit west of the town. And from my neighborhood I can look over and see the river trestle that crosses the Ponderay. Four trains crossing that bridge increase the risk of disaster in that fold.

As a former fireman in the Westside Fire District in this heavily forested area, I know how dangerous an explosive oil train derailment can be. Especially when you think about the record-breaking hot dry summers we've been having.

An even more important concern for me is that climate change. I'm not a climate scientist but I do have a Master's Degree from Princeton University, and I'm a trained scientist.

I've read numerous book by climate scientists and writers, and also many magazine articles, newspaper reports, and scientific newsletters about climate change. In my opinion it's the greatest threat that mankind has ever faced. And the very future of civilization is at stake here.

The proposed oil facilities will only ensure that we burn still more oil and continue to raise the Co2 content and the temperature of the atmosphere. These effects could become unstoppable due to powerful feedback loops.

The small number of permanent jobs we're talking about here are not worth the risks to civilization. We should not burn this oil, we should leave it in the ground. The research and development money of big oil can be used to develop alternative energy sources such as wind, solar, and fusion instead.

I strongly urge you to deny the permits for any more storage facilities. As Pope Francis has recently stated, we all have a rural obligation to leave our children with a habitual world and we must tackle climate change aggressively.

Response GP814-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP815, **Water, Mary**

Comment GP815-1

I would like to voice my opposition to the proposed expansion.

While the impacts addressed in the draft EISs focused on the area around Grays Harbor, the impact will actually be felt throughout the state and country due to the increased number of trains carrying Bakken oil. In the Spokane area, trains already restrict traffic on the many roads that lack over- or

underpasses. Increased rail traffic also brings an increase in noise, and in the hazard that a possible derailment could bring. In a world facing dire consequences from global warming, we do not need to promote the use of more fossil fuels.

Response GP815-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP816, **Watkins, Eric**

Comment GP816-1

Hi, my name is Eric Watkins, 58 years Grays Harbor, Hoquiam specifically. I've watched so many grow, shrink, grow, shrink. A lot of years I've watched appropriations try to leverage a cheap spot. New Port, for instance, they were ready to take apart the basin. How ridiculous is that. Okay?

They used to perceive economic vitality to these things exactly what this oil outfit is trying to do. What will happen here is if this goes through, it will actually cork up any economic diversification. It would be bad, that right there. We have enough bottlenecking in Grays Harbor already. The mitigation, we all know mitigation is the word itself is fallacy.

You cannot mitigate completely. There's no such thing as complete mitigation. Once it's spoiled you cannot bring it back to the thousands of years of diversity ever. I make my living off of natural resources. There are jobs in natural resources. Okay?

There's really no need for this oil train to be here at all. With the amount of jobs, it doesn't pencil out. The trade off is not worth it. Whether it's bottleneck, a spill, a catastrophe, it doesn't pencil out. Even if nothing happens, it does not pencil out. That's all I have.

Response GP816-1

Refer to the Master Response for Mitigation Framework for more information about the development, implementation, and enforcement of mitigation measures.

GP817, **Watson, Mik**

Comment GP817-1

I'm just an old retired guy living in Ocean Shores, but I can see problems with this proposal... 1) Storage of 42 million gallons of crude oil on the shores of Grays Harbor. In Hawaii, I saw the fuel tanks for Pearl Harbor were up on the hill, away from the water itself. And they don't have subduction quakes and tsunami threats. In our harbor, any tsunami wave will get focused to that

exact area they are planning on putting that storage. Is there designs for the structures, along the lines of the vertical shelter being built at Oscala to deflect the wave force? And I'm not sure THAT would be enuf to keep our harbor from the devastation a split tank would cause. I'm leaning more to getting the 'Storage' of 42 million gallons of life-killing crude oil inland where the damamge can be mitigated before it destroys the whole area.

Response GP817-1

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP817-2

Transport of crude oil by rail has its own problems. The focus of your study is on the property that Imperium, Inc resides on, but there's much more involved. The single rail line that serves Gray's Harbor, and that the crude oil is transported on, follows the Chehalis River for better'n 50 miles. The tank cars used (single-hulled, but that's another issue) will be next to this vital link to our harbor, and a serious threat to wildlife and OUR life. When an accident (let's face it, the longer crude is on the tracks, the more chances that there WILL be a spill) occurs, the oil will get to Gray's Harbor. There is no doubt that ANY spill be a death knell for EVERYONE along the Harbor, even those who livelihood isn't based on the water (shops, service, tourism. Have they considered the terrorist (foreign or domestic) problem with a rail line next to a natural resource? I, for one, don't consider crude as an acceptable salad dresssing, and remember the lessons of the Exxon Valdez and Bellingham. The issues of storing and transporting 42 million gallons of crude oil are too big for the infrastructure around Gray's Harbor. We don't have, nor will we ever have, enuf safety measures to protect ourselves against the release of even a small part of the proposal being applied for. When the price of crude gets too small to be financially viable, who will be responsible for the maintenance of the facilty? No matter what words you try to wrap Imperium up in, they will not be there when crude is made passe (and it will be, it's already being replaces in several areas). Please remember that toxic release on the Colorado River last year, the remains of gold mining left to rot, exacerbated by the very people who were supposed to protect us against that. Let's not get that started here.

See original attachment for photograph.

[Photo reviewed but not reproduced.]

Response GP817-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or within Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Refer to the Master Response for Environmental Health and Safety Analysis for information on the approach to the analysis.

GP818, **Webb, Marty**

Comment GP818-1

Hi. I'm Marty Webb, I'm from Tacoma, Washington, Pierce County. And I grew up by the ocean. And I grew up on a very narrow peninsula, so I have the Pacific Ocean on one side and San Diego Bay on the other side.

The San Diego Bay was heavily polluted. My swimming lessons had to be canceled. My father would come in with fish that had to be thrown out, until finally somebody got the bright idea that the city could make money off of that bay, and so they cleaned it up. And now we have this glittering resource.

Governor Gregoire, same thing about Puget Sound. She said, oh my goodness, we can't afford to have a polluted Sound, we've got to clean that thing up because it's a huge economic resource for the state.

I am against this proposal because I think you're risking a natural resource that is a huge economic resource for the state, for the people.

I was really glad a fisherman was here to talk about his livelihood because I think we tend to forget. And I'm so grateful for the Pope who kept repeating -- almost every topic he brought up he kept repeating, listen to the people's stories. And I hope that there is somebody -- I don't know if any you of there -- I hope somebody on your board of decision making makes their living off the ocean or the waterways around here. I hope. Because otherwise I'm not convinced that their stories will be heard, because I think it's really important.

There's been a recreational use survey done. If you look at the map of that you will see that the red dots are the most important areas.

Gosh, Westport, Grays Harbor is just packed. It's solid red and then it sort of trickles down the coast. This is the hot spot for recreational use, really an important area.

And then I just wanted to end with, we don't have to judge progress by just improving oil, we can judge it on other things as well. So thank you.

Response GP818-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP819, **Webb, Mike**

Comment GP819-1

Good afternoon, Panel. My name is Mike Webb, Pierce County. And I come here with 40 years-plus, post-graduate degree in environmental science. Been cleaning up hazardous locations that whole time. Studying them, try to prevent them, and here I am.

But really I'm speaking very personally at this point. My career aside, my comments are cultured from public statements aired at meetings in Aberdeen prior to this public comment period, and people have already made some points clear. They came from fishermen and shellfish growers. Again, I see some of them coming here. I'm glad to see that.

The problems I see are in addressing the balance of risks of the oil spill and potential damage and the lack of mitigation to address such situation in this draft proposal.

Response GP819-1

Refer to the Master Response for Mitigation Framework for more information about the development, implementation, and enforcement of mitigation measures.

Comment GP819-2

So, first, there's a history of derailments on the current line. I think I just heard somebody just speak of that. I don't think that risk is elevated high enough for even a small train.

The clean-up techniques that are available for such -- and even projected, are inadequate to afford the five non-currants that have created risks that raise our (inaudible) from fishermen. They ought to know. They've been here since 1988 when it happened out at sea and still got in the way.

Response GP819-2

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities.

Comment GP819-3

So then the health risk assessments are balanced toward the average fish consumer. And by design they cannot address the consumption by people who get most of their food from the ocean, such as the tribes. Mitigation. It's not there.

Response GP819-3

Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

GP820, **West, Ashley**

Comment GP820-1

My name is Ashley West. I am a recent graduate of Western Washington University. I am a lifelong resident of Washington State and a frequent visitor to our inland and coastal waterways. The last few years I have traveled several times a year to Grays Harbor and north coast beaches.

The DEIS fails to adequately address the ecosystem services, especially recreation and tourist related services, that a healthy and clean marine environment provide for thousands of visitors to our shorelines. A healthy marine environment not only provides for a rewarding recreational experience it also provides the basis for a significant marine based tourist economy. All is at risk from a major fire, explosion or spill from these projects. Repeated references in the DEIS point out

that these risks cannot be mitigated. The benefit from these projects pale when measured against the potential harm they bear. If the risks from these projects are significantly adverse and cannot be mitigated the permits for these projects can and should be denied.

Response GP820-1

Draft EIS Chapter 3, Section 3.10, *Recreation*, describes the affected environment for recreation and tourism. Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, identifies impacts on recreation and the broader aquatic environment that could result from from oil spills, fires, and explosions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

GP821, **Wetter, Margaret**

Comment GP821-1

My church holds our annual EarthCare retreat in Grays Harbor County. We do not want this vibrant ecosystem turned into a fossil fuel sacrifice zone. We respect the beauty of Creation and ask you to protect it from the unmitigatable damage of these oil proposals.

Response GP821-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP822, **Wetzel, Paul**

Comment GP822-1

My name is Paul Wetzel I am a life long resident of Grays Harbor county, retired teacher, avid cyclist, kayaker, and sport fisher. 1. The deis uses the term “best management practices” through out the executive summary as a way to minimize the risk of an oil spill. What are these best practices and who is responsible for making sure they are followed? What historical evidence is there that they are effective?

Response GP822-1

Best management practices (BMPs) are used to achieve a desired outcome while reducing potential impacts on human or natural resources. BMPs are generally industry-accepted practices that have been tried and proven successful over the years. Draft EIS Section 3.17, *Vessel Traffic,* provides an example of a BMP in the use of tugs for vessel transport to reduce the potential for collisions or allisions*.* Any specific measures needed to reduce impacts consistent with regulatory standards would be added as conditions of the permit for the proposed action. Applicable permits and regulatory requirements are considered in the analysis of impacts. Where needed, additional mitigation measures are proposed. Refer to the Master Response for Mitigation Framework.

Comment GP822-2

2. In the executive summary section "what are the cumulative impacts" a number for greenhouse emissions is written 103,750 million metric tons. Is this suppose to mean 103 billion 750 million metric tons = 103,750,000,000 metric tons?

Response GP822-2

Final EIS Chapter 6, *Cumulative Impacts*, Table 6-4 has been revised to show the correct number, 103,750 metric tons.

Comment GP822-3

3. In the executive summary it states that the risk of a vessel collision is low but the chart shows its more likely than not. Which is it?

Response GP822-3

For the reasons discussed in the Master Response for Risk Assessment Methods, the figures depicting risks presented in Draft EIS Chapter 4, *Environmental Health and Safety*, have been removed from the Final EIS.

Comment GP822-4

4. Using these projects to facilitate the burning of fossil fuels world wide will hasten our approach to the three degree limit climatologists say is the point of no return for catastrophic overheating of the planet. If we go beyond the three degrees what "mitigation" will be available to us? Paul Wetzel 10-22-2015

Response GP822-4

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP823, **Wichar, Den Mark**

Comment GP823-1

Den Mark Wichar, Clark County. I came with prepared remarks, but I don't feel like reading them. The reason I came all the way from Clark County to Grays County is because one of the things about this is the countless, countless, countless, endless proposals that are being thrown at the Pacific Northwest, both Washington and Oregon, by the fossil fuels industries, be it soil, be it gas, is that the proposals always presume that the only concerns that exist in the mitigation are found in the precincts of the facility under question.

I would suggest that that's hardly the case. In Vancouver we are aware how our community is affected by an endless parade of oil trains.

Big oil proposes that Vancouver, Washington, USA because we're at the end of a choke point in the whole rail system. That we should continue to tolerate these trains forever.

Well I have news for the oil industry and I have news for Imperium and Westway and for Grays Harbor. The County is sick of this. Vancouver is sick of this. In all of my years of environmentalism, I have never seen a coalition in opposition like I see now.

We have a mayor developer who is in Vancouver proposing a $1.5 billion project. He opposes this. Our city opposes this. Tribes oppose this. Our small business people oppose this. I'm here to tell you that Grays Harbor, you are not an island.

Response GP823-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP824, **Wichar, Den Mark**

Comment GP824-1

Name: Den Mark Wichar
City/State/Zip: Vancouver, WA 98660

I oppose both projects. Not one of the impacts would be sufficiently mitigated. My city, for example, cannot tolerate more oil trains.

Response GP824-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP825, **Wilbert, Ed C.**

Comment GP825-1

Comments to Draft EISs Imperium and Westway Expansion Projects 10/19/15

These two EISs should have been combined, along with the third one. WAC 197-11-060(3)(b) states "Proposals or parts of proposals that are related to each other closely enough to be, in effect "a single course of action shall be evaluated in the same environmental document" Both of these documents, despite supposedly different proponents, were prepared by the same consultants. Both involve crude oil storage and shipping facilities in a common area, and shipping by rail on the same tracks. Please explain in detail why they were not combined, along with the third project, into a single, concise, readable document The fact that a third project follows these two is classic segmentation - spreading out similar impacts· over separate documents to make them appear smaller. Please explain how this is not segmentation. Please explain how producing 3800 pages of repetitive text, much of it meaningless boilerplate, was not an effort to prevent meaningful review. Also- because of the structure of the documents it is very hard to review the information and prepare comments at the same time.

Response GP825-1

Refer to the Master Response for Connected or Similar Actions.

Comment GP825-2

My family have worked, fished, hunted, and harvested clams on Grays Harbor for many years. One big concern we have is the oil spill mitigation (no mitigation offered) proposed for the expansion projects. We were previously concerned about the Geographic Response Plan (GRP) for Grays Harbor and our concerns are the same. In the event of an oil spill the GRP does not address how the mess will be cleaned up without any environmental damage and brings forth the assumption: "stuff happens".

That was before these two projects were revealed to the public. Now we learn that Canadian crude oil (dilbit) may be handled at the Port. If this is true a Canadian crude oil spill would be much worse than a regular crude spill. This is a serious concern as the Canadian crude sinks in water after the carriers wash out or evaporate. Our local news papers have carried stories about how devastating and expensive this type of crude is to the environment. The GH estuary is a closed water body with large exposed mud and sand flats. Any type of spill if not quickly cleaned up will bond with the sediment and become tar balls that will move to deep water and widely dispersed. Even a small spill will be hard to manage.

Response GP825-2

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Comment GP825-3

The old poorly maintained rail line from Centralia to Hoquiam is also a concern. Massive increases of crude oil traffic on this old line begs a spill to happen. The rail line snakes through a country side with many water bodies, rusty bridges and a difficult terrain not easy to access. Any spill here would be hard to cleanup and would eventually find its way into Grays Harbor. Reportedly only about 10 to 14% is ever pick up after a spill leaving the balance to keep polluting the environment

It was reported today by Sightline that Genesee and Wyoming, the parent company of Puget Sound and Pacific~ is woefully underinsured to cover a spill in Grays Harbor county. These dilbit spills are very expensive to manage as some cost over a billion dollars which G&W is ill prepared to cover.

Please update the DEIS section on oil spills for dilbit and update the insurance coverage potential oil spill coverage by PS and Pacific.

If these two concerns can't be mitigated or updated to satisfy community concerns then these two projects should not go forward and a No Action declaration made.

Rod C. Wilbert P.O. Box 2138 Westport, WA 98595

Response GP825-3

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP826, **Wild, Noah**

Comment GP826-1

I am deeply concerned by the proposals to expand storage at these two facilities. The last thing we need is more dangerous oil trains traveling through the Columbia Gorge Scenic Area. These trains are dangerous, ugly, and are not taking us in the right direction in terms of future energy sources. We cannot risk a toxic spill like the one in Canada that killed 47ppl last year. Please reject these expansions and help keep our community safe.

Response GP826-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP827, **Williams, Donald**

Comment GP827-1

I am writing in total opposition to the proposed retrofits of the Westway Terminal Company and Imperium Terminal Services facilities at the Port of Grays Harbor, and the third terminal not included in the DEIS.

My concerns are for environmental impacts caused by the bulk oil storage facilities at the Port but also environmental and economic impacts relating to the transport of crude oil by rail from its source in the Midwest and by ship through the narrow and shallow passages of Grays Harbor.

Mitigations In The DEIS Did Not Consider Coastal Communities

There is currently no crude oil moving through Grays Harbor. These terminals will increase oil tanker and barge traffic by 450% adding 750 crude oil vessel-trips each year. Loaded vessels carry 15 million gallons of oil - more than the Exxon Valdez spilled in the Alaska accident.

Yes, I am concerned. I do not believe the mitigations included in the DEIS are adequate to protect against environmental and economic impacts, and the damages that will result, from the proposed projects - especially as they impact the coastal communities.

I am a long-term resident of the City of Ocean Shores, WA. We are a retirement community located at the mouth of Grays Harbor on an 8-mile-long by 2-mile-wide peninsula. Our city depends on property taxes paid by our residences, and on taxes provided by an extensive and growing tourism and recreation based industry. These all rely on our pristine sandy beaches, our clamming industry, our wildlife, the marine habitat and the beauty of our coastline. These must be preserved regardless of what it costs the project operators and the Port of Grays Harbor.

The operators and the Port must assume all financial risk and provide financial guarantees against all possible environmental and economic damage that can be caused by this proposal.

My city and many coastal communities will be devastated by a single oil spill. We experienced this in 1988 when the barge Nestucca collided with its tug boat. Oil migration from central Oregon north to Vancouver Island contaminated beaches, damaged marine habitat and caused extensive economic damage. The 1988 oil spill was small compared to what will result from oil tankers and barges carrying 15 million gallons of crude oil. My city, Ocean Shores, did not return to normal for many years and suffered extensive economic damage.

Coastal Communities Were Neglected In The DEIS

Of special importance to me and to the citizens of coastal communities like Ocean Shores is that there is no consideration, or any mitigation proposed, for the impacts that oil spills at the Port facility, oil spills related to processing, storage and loading, and oil spills in transit within and outside Grays Harbor, will have on coastal communities.

Response GP827-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms, including the potential to impact coastal resources.

As discussed in the Master Response for Oil Spill Modeling Methods, Draft EIS Appendix N, *Oil Spill Modeling*, acknowledges the limitations of the selected modeling tool to depict the movement of oil outside of Grays Harbor. Attachment A of Appendix N discusses two previous large spills, including the Nestucca that occurred off the Washington State coastline to illustrate the directions that oil can migrate offshore depending on seasonal conditions. Final EIS Chapter 4, Section 4.4, *Environmental Health Risks—Terminal (Onsite),* has been revised to clarify the potential for spilled oil to move

outside of Grays Harbor up or down the coast, depending on the specific conditions present at the time of the incident.

Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms and has been updated to provide additional information about economic and social costs of oil spills.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from vessel transport—less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

For more information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP827-2 **Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.**

Accordingly, I request that the DEIS be rejected and that additional studies be required to address how Ocean Shores and other coastal communities, including the Quinault Nation, will be made whole from the devastation that even a small oil spill will cause. Please address the following:

1. What design requirements will be placed on vessels to ensure that their structure will sustain all levels of collision or other accidents in transit?

2. How will the oil vessels be escorted from the Port facility to well into the Pacific Ocean so as to guarantee that there is no possibility of any type of oil spill affecting Ocean Shores, other coastal communities and their beaches? Over what distance will escorts be required?

3. What rescue and backup systems will be in place and operational on a 24/7 basis to ensure that all types of emergencies can be accommodated with complete safety?

4. How many tug boats will be available to respond to situations and where will they be based to guarantee a rapid response and total safety of the oil shipments? Please require an analysis for every type of emergency situation that will be encountered.

5. Are the Port's navigational systems adequate? What new navigation aids such as the latest-design vessel traffic control systems and radars will be provided to guarantee safe navigation in all types of weather? 6. What level of financial responsibility will be placed on the operators and the Port in order to mitigate the financial devastation that even a small oil spill will have on the economy of Ocean Shores, other coastal communities and the Quinault Nation?

7. How will the operators and the Port guarantee that there are adequate financial resources in place and guaranteed by the operators and the Port through, for example, liability insurance and/or security bonds to pay for cleanup and economic damage caused by the worst-case oil spill.

These guarantees must include how the financial liability will be shared between the operators including, but not limited to Westway, Imperium, the Port of Grays Harbor and future operators, for any and all financial liability from the worst-case oil spill. The plan must ensure that 100% of the cleanup costs and all economic losses will be assumed by the operators and the Port for the worst-case oil spill which may affect many coastal cities, local communities and the Quinault Nation. These are important issues that must be examined and resolved before any permits are issued.

My concerns expressed herein are focused on the impacts to coastal communities. These were not considered in the DEIS - the substantial risks to the environment, to our economy and to the existence of viable coastal communities of which I am a part.

This is a very risky proposal if allowed to go forward. In addition to the risks of vessel traffic and oil spills, it involves dirty and dangerous oil trains that have an alarming safety record. I did not address the air pollution, spill risks on land and the traffic delays but these will come with the project, adding to my concerns.

I am also concerned about the location of these facilities storing 72 million gallons of crude oil at sea level, in a population center, and in known earthquake and tsunami zones. Taken together, it is irresponsible to even consider such a proposal.

My concern expressed here is for what was omitted from consideration in the DEIS - how the proposal affects coastal communities. For this reason, I request that until these risks and issues are resolved that all permits relating to this proposal be denied.

Thank you for your consideration and for providing an opportunity for concerned citizens like myself to express our views.

Sincerely,

Donald S. Williams A resident and property owner of Ocean Shores, WA

Response GP827-2

Specific design requirements for vessels, reporting protocols, and the framework for preventing, preparing for, and responding to an incident are described in Draft EIS, Chapter 4, Section 4.2, *Applicable Regulations*. Navigational requirements, including the use of tugs, are addressed in Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*. Mitigation measures to improve navigational safety are proposed in Section 3.17 and Section 4.6.3.

Draft EIS Chapter 4, *Environmental Health and Safety*, Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP828, **Williams, Imogene**

Comment GP828-1

I'm Imogene Williams, and I live in Seattle. But I'm married into the Williams families of Cosmopolis. They work for Rainier and the AWPPW, Association of Western Pulp and Paper Workers.

Grays Harbor is God's country. Our kids ran through the woods and the grassy hills. It's wonderful. But if it gets all spattered with oil and the kids get asthma, Imperium and Westway are not going to care.

So we ask that you turn down this terminal. It's the wrong direction for Grays Harbor and it's the wrong direction for Washington state. So we ask that you turn it down.

Response GP828-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP829, **Williams, Imogene**

Comment GP829-1

I'm Imogene Williams. I live in Seattle. Grays Harbor is God's country. It's green and moist and beautiful. The trees give us oxygen, but we must not take it for granted. The oil companies will destroy it, and they won't care. They will destroy it. We can't take it for granted.

I read that the shipping channel into Grays Harbor is long. It's not very deep, and it's not very wide. So you're going to have two or 300 vessels a year, tankers and barges that are going to come in, and they're going to come out and maybe somebody's coming in, and they want to go out. It's almost like Seattle traffic is what it sounds like. I think it will be very chaotic, and I hope that it doesn't happen.

I want to talk a minute about the hazards. There are different sorts of crude oil. You probably know this better than I know it. But the kind that goes from South Dakota is particularly dangerous because it's not like crude. It's not sticky black crude oil. It's much more like gasoline. It has a different composition, so it's much more dangerous.

And as you know, gasoline doesn't have to have a derailment in order to explode. It can explode very easily without very much disturbance. So I very much hope that this expansion does not happen. Thank you.

Response GP829-1

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP830, **Williams, Imogene**

Comment GP830-1

Grays Harbor is such a beautiful home for fish, families, birds, clams, kids, seniors. Oil trains are not healthy for these (or any) living things. Please do not approve the expansion.

Response GP830-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP831, **Williams, Steve**

Comment GP831-1

Good afternoon. Thank you for the opportunity to speak today on our proposed project. I'm Steve Williams, Terminal Manager of Westway Grays Harbor. I'm also a Hoquiam native, and I'm proud to be a part of this community. Part of Grays Harbor since 2009, Westway has provided bulk liquid storage, third-party distribution and related services. Our company has been in business for 60 years, and we have dealt with the best reputations for energy and for consumer safety.

The expansion of our terminal represents a long-term commitment to the community. And according to the third-party economic analysis, our project and a similar project at REG will create 280 full-time jobs, which pay an average of 84,000 per year. This project will create more than 870 jobs during the year-long construction process.

Westway is committed to hiring locally and using locally sourced projects whenever possible. As a native, I know how eager folks are to get back to work. We receive calls frequently from people who want to work on our projects. We're confident we will build this project in a way that will protect our neighbors and the environment we all value.

Westway looks forward to working closely with Ecology and the City of Hoquiam to meet the high standard of the EIS, and build these projects with the highest commitment to safety. We look forward to getting to work so we can put people back to work, stimulating the economy and generating revenue for our local governments that provide valued services like education and public safety.

Again, thank you very much.

Response GP831-1

Comment acknowledged.

GP832, **Willis, Jeffrey**

Comment GP832-1

I am apposed to oil trains coming into Grays Harbor. The potential volume of trains based off of the projected capacity of the terminals on a single sourced rail line would cripple the County, even if there were no breakdowns or other incidents. Please consider every County resident that uses a rail crossing each day and the business' that require thier customers to cross a rail line to access them. We will only suffer the consequences and will not reap any of the benifits. This one reason alone is my major concern and is the catalyst to voice my opposition, but I am also unified with those who hold concerns for safety and the potential enviromental impacts. Please do not allow oil trains into Grays Harbor. Thank you

Response GP832-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP833, **Wilmering, Kathy**

Comment GP833-1

My comments relate to both the Westway and Imperium Draft EISs.

If this project goes thru, we are begging for an oil spill. Our own Dept. of Fish & Wildlife states that this area is especially susceptible to the effects of an oil spill. Each time oil companies propose a project, they state that this time their safety procedures will negate the possibility of spills, but serious & catastrophic spills continue. Plus, given that the harbor is sited in a major tsunami/earthquake zone, the likelihood of any adverse effect is multiplied. This is in addition to the increased number of oil trains exploding. In order to export our oil to other places, including overseas, Grays Harbor is being asked to shoulder all the risk, including that to about 1/3 of its work for [illegibile], in addition to tribal fishermen.

Also, the DEIS limited its review & didn't consider other impacts along the railway lines. It also didn't review the unique hazards of the different types of crude to be shipped.

Lastly these projects will increase greenhouse emissions, by about 2.6%, from what I?m reading. Our planet is on the edge of environmental catastrophe. We do not need to & should not be adding to the danger.

Response GP833-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and

vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms and has been updated to provide additional information about economic and social costs of oil spills.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6, *Cumulative Impacts*, reflect additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7 would also apply to the extended study area.

For more information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

GP834, **Wilson, David**

Comment GP834-1

I've done these things right here on the street and God can use those things to turn us hopefully around. Please say no to these things with oil and help us not to bring -- God's wrath is going to be inevitable if we don't turn our hearts back to Him.

Hello, I'm David Wilson, Sr. I live in Hoquiam, Washington. I was born and raised here, and I stand here because God has brought me here. And I see all these, I took notes here from other people, earthquakes, tsunamis, and numerous types of catastrophes. And this has gone on and on. You name it, it's possible.

We've talked about safety emissions, following the goodness of our hearts, the example of heroin was being used, you know, deeper wisdom and intelligence was mentioned, open for accidents, the fracking, which is basically we're making our own earthquake, derailments.

These are all things to mention, but I think it's a deeper understanding than that. This is a spiritual battle. And we need to wake up. People need to stand up and turn our hearts, and stiff necks, and our minds to Him because He has the power to change. He's done it with me.

And I don't belong to any religious affiliation. I'm running for the city council. I belong to no religious parties. I belong to God.

Response GP834-1

Comment acknowledged.

GP835, **Wilson, Don**

Comment GP835-1

My name is Don Wilson. I am a lifelong resident of Washington State and reside in Seattle. I am a recently retired Maintenance Supervisor for the Renton School District. I am a lifelong outdoorsman and sportsman. I know the importance of maintaining good water quality for all of the activities we enjoy in our State. The expansion of oil train traffic and proposed oil terminals bring grave risk to our quality of life. The DEIS on the oil terminal projects in Grays Harbor has many deficiencies and inaccurate statements. The idea offered in the mitigations prescribed that an oil spill could be contained let alone recovered in Grays Harbor is disingenuous. Oil spilled in Grays Harbor will not be contained and little of it will be recovered. If Heavy Crude oil such as Tar Sands oil is spilled in Grays Harbor much of that will likely sink and will destroy the estuary. The DEIS itself states that the risk from a major spill event cannot be mitigated. If it cannot be mitigated it should not be permitted.

Response GP835-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 to reduce the likelihood of a spill reaching the environment and the potential impacts if an incident occurs at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities. For more information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework.

GP836, **Wilson, Richard L. (Bay Center Farms)**

Comment GP836-1

Bay Center Mariculture Co.

October 12, 2015

TO: City of Hoquiam and the Washington State Department of Ecology.

Ref: Comments on Draft EIS for Westway and Imperium Expansion Project.

From: Richard L. Wilson, Ph.D., President

[See original attachment for photographs and maps.]

Introduction: It seems that realistic local citizens upon learning of the proposal to build additional storage tanks to hold 72 million gallons of the, new to this area, explosive Bakken crude oil is not only an unwelcome venture but an inimical business plan in light of petroleum economics and environmental concerns. Furthermore, to place these additional storage tanks nearly at sea level a few meters from the margin of the Grays Harbor estuary starts to border on foolish. The draft EIS cites further plans to incorporate and use an older rail line from Centralia to Grays Harbor to transport daily millions of gallons of the two very distinct types of crude oil with individual characteristic and potential to invoke environmental damage. The Bakken crude with a volatile component and the asphalt like bitumen extracted from the Canadian oil sands which requires a volatile solvent to be viscus enough to flow. To reach the proposed storage area between Aberdeen and Hoquiam the crude will have to travel from the central canadian oil sands region and the Dakotas along the Columbia river and through cities such as Spokane, Tri-Cities, Vancouver, Longview and of course Aberdeen (Figure 5-5). Foolish is morphing into insanity but the proposed actions and environmental threat does not end with storage at the proposed tank farm.

The next sections of the proposal deals with loading those millions of gallons of crude into large tankers or tank barges and send them out over some of the most vulnerable productive marine habitat on the Pacific west coast. After clearing the bar at the mouth of Grays Harbor these vessels would travel north or south to other US ports or across the Pacific ocean to foreign markets. (Oil movement map Fig. 5-1). The marine phase would seem to present the highest probability of a cataclysmic oil release with tanker vessels carrying up to 320,000 barrels (13.4 million gallons). Although there are many aspects that need review in this multi faceted project these remarks primarily address the rail and marine transport phases.

Train transport in study area: Probably important to note up front and as stated in section 3.15-1; "No local laws or regulations apply to rail traffic." As I interpret this, essentially local citizens have little say about how rail traffic is handled within their urban or county areas. Chance of input is on this EIS draft.

Response GP836-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Final EIS Chapter 4 includes updated information about the development of new and draft state rules and operational procedures aimed at improving rail safety in Washington State. These rules would also reduce the potential risks of crude oil transport related to the proposed action. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location,

amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Comment GP836-2

"The PS&P rail line and river crossings between Centralia and Hoquiam was originally constructed between 1889 & 1896" (EIS 3.15.4.1). The entire rail line between Centralia and Hoquiam is single track. On a single- track line, segments of second track (sidings) must be located periodically along the line to allow trains to pass each other (passing or meeting). Upgrades have occurred but will this old railroad be upgraded enough to handle increased volume and weight? Have the proper safety features been installed to transport these highly dangerous materials to avoid collisions or derailments and making sure protection for waterway crossing is in place. There are 52 rail bridges on the PS&P rail line between Centralia and Aberdeen crossing various wetlands, soughs, rivers, creeks... etc. Major rivers to be crossed are the; Skookumchuck (MP1.68), Black (MP12.64), Satsop (MP52.43), Wynoochee (MP59.00), Chehalis (MP66.25), and Witch (MP68.24).

Response GP836-2

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP836-3

A difficult aspect to decipher in the draft EISs are the impact of an additional 3.25 daily crude oil trains each with 120 tanker rail cars using (blocking) the crossings with half loaded with explosive Bakken and Canadian crude. What effect per day will be imposed on travel times, deliveries, businesses and emergency vehicles? The exposure and delay times at various crossings both between Centralia and Aberdeen and especially within the Aberdeen area are difficult to fully understand. It seems the data presented in both draft EISs on the crossing wait times have to be determined from the combined delays of trains going to both proposed facilities. Using Table 3.15-9 (in both EISs) on that part of the train route from Centralia to Aberdeen for the five listed crossings the no-action option at present has combined delay of 84 minutes per day. Adding the 120 car crude oil cars as proposed would increase these crossing delays by 126 minutes per day or by 2 hours and 6 minutes for a total of 210 minutes instead of the current 84 minutes per day. However, the large increase in delays on the various five crossing in Aberdeen could really be important which would be due to those three plus 1.25 mile long full and empty crude oil trains. In Figures 3.15-11 the no-action option currently shows the combined delays at five crossings of 193 minutes (3 hours 13 minutes). Then by adding the combined effect by Westway and Imperium crude oil train delays the expected daily total delay appears to increase by 556 minutes daily (9 hours 16 minutes) which as estimated would total 12.5 hours per day. This should be detailed for those who will be impacted

especially in the downtown area. Fig. 3.15-6 One westbound (loaded) crude oil train and time at various crossings. McDonald's Driveway?

Response GP836-3

Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, describes impacts of the proposed action on rail traffic in the study area, including rail line capacity and train occupancy times at grade crossings. Section 3.16, *Vehicle Traffic and Safety*, describes the potential impacts of increased rail traffic on vehicle traffic, including grade crossing delay and queuing at nearby intersections. Figure 3.15-6 shows select grade crossings east of Poynor Yard. For detailed vehicle delay information, refer to Section 3.16.5.2, *Proposed Action*, and Appendix L, *Vehicle Traffic Analysis*.

Chapter 6, *Cumulative Impacts*, presents the analysis of the incremental addition of impacts from the proposed action to impacts from past, present, and reasonably foreseeable future actions—including the REG (formerly Imperium Terminal Services) Expansion Project and the Grays Harbor Rail Terminal Project.

Comment GP836-4

The EISs also are not clear on future plans concerning expansion as judged by certain statements. If a maximum number of trains on the PS&P track is currently determined to be 12 per day with plans to expand to more does this mean additional crude oil shipments? Instead of the current 6.25 (3 current or no-action and 3.25 to be added by the proposed action) what is the number for the future? Also, a consideration for the number of cars in a train is not assessed in terms of impact. The current non crude oil trains now average 63 cars per train. Contrast that with the crude oil trains with 120 or nearly double the existing train size. Then would there be an additional 5-6 crude oil trains with 120 tank cars each to meet the track capacity? Does the EIS place a cap to the 3.25 trains daily as proposed with the number of cars which is nearly twice as many as currently are being used. It seems the number of tank cars is very critical for crossing times and time required to head the train back to the oil fields. Are plans proposed to make sure spill response equipment and supplies will be available in accordance to the magnitude of and volume of the oil shale bitumen that is planned to be transported? Where is spill containment equipment going to be stored? Detail of these questions seem to be few in the EIS.

Response GP836-4

The proposed action includes rail transport of oil to the proposed facility. Rail traffic would consist of unit trains of 120 cars (1.25 miles long). Operation of the proposed action at a maximum throughput would result in a maximum of 458 train trips (each trip is one-way travel) or an average of 1.25 trips per day, along the PS&P rail line.

Current freight rail traffic on the PS&P rail line is shown in Draft EIS, Chapter 3, Section 3.15.4.6, Table 3.15-4. A total of three trips per day, including full and empty trains (1,235 trips per year, with each trip being one-way travel) currently occur on the PS&P rail line. Typical numbers of cars per train vary depending upon the commodity being shipped; typical trains range from 50 to 100 cars per train.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that

would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP836-5

The EIS implies that the PS&P rail line adds little to the overall rail dangers. The EIS appears to base this on the small percent increase by rail for the entire heavier use on the better maintained BNSF rail complex that crosses the state from Idaho. The current light use of the older PS&P line from Centralia to the coast has little traffic especially of the long heavy oil carrying trains which would be added. The risk factor on the older lightly used PS&P rails in terms of crude spilling, fire or explosion between Centralia and Aberdeen is essentially, if not a new one, certainly a greatly increased old one with a new frequency not comparable to the heavy traveled BNSF rail complex.

Grays Harbor Bay study area: Vessel traffic as defined (3.17.1) includes all of Grays Harbor, the navigation channel and out three nautical miles into the ocean (see image at end of comments). A little difficult to find but the EIS does state; in section 5.7, " As discussed in Chapter 4, Environmental Health and Safety, large oil spills, fires or explosions would likely include unavoidable and significant adverse environmental impacts. Although the likelihood of a large spill, fire, or explosion is low, the potential for significant adverse impacts on the environment and human health in the case of such an incident is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. Examples of these impacts are described in Section 4.7, Impacts on Resources."

Response GP836-5

Comment acknowledged.

Comment GP836-6

Not much attention in the EIS is devoted to the geomorphological setting of Grays Harbor. Grays Harbor is a relatively shallow embayment estuary with multi creek and river input. It has a dynamic sedimentary component driven by both tidal and tributary currents, wave action, stream and river deposition and longshore ocean beach transport. The channel requires about one million cubic yards of dredging yearly to permit passage of the current vessels. How much addition dredging will be needed. How deep and how often and what is planned for the spoils? Will contamination be monitored and dredge spoils be deposited away from Dungeness crab and shellfish growing areas, as well as, other critical benthic areas? Is an upland site available for disposal of contaminated sedimentary materials? Channel maintenance would seem a vital activity to allow the increased tanker traffic and the EIS should detail these plans.

Response GP836-6

Draft EIS Chapter 3, Section 3.3.4.2, *Surface Waters, Grays Harbor*, describes Grays Harbor as a water resource. It includes information on drainage basin area, size and dimensions of the harbor,

formation of the estuary, sedimentation sources, sedimentation deposits and movement, water depths, navigation channels, mudflats and sandbars, tides and tidal currents, sources of freshwater inputs (rivers and streams), and salinity ranges.

The proposed action would not require dredging or deepening of the navigation channel to accommodate vessel traffic. Section 3.17, *Vessel Traffic*, evaluates the capacity of the Grays Harbor Navigation Channel to accommodate proposed action-related vessels.

Comment GP836-7

Grays Harbor bay and estuary with the productive intertidal areas present the biggest possibility of irreparable destruction by a large oil release from a tanker or tank barge. For example, a tank barge loaded with over 6 million gallons or, a tanker with 13 million gallons of crude oil breaking up at the mouth of the bay and the oil stays on the mudflats. A tanker volume of the thinner Bakken crude could cover nearly 8 sq. miles of intertidal to one tenth of an inch deep. The heavier asphalt like crude as thinners evaporate could cover 1.5 sq. miles one half inch thick. Could these companies meet the cost of a massive environmental clean up as required by law? Could a cleanup be effective at revitalizing or reclaiming the mudflats?

Response GP836-7

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP836-8

The important weather and water conditions are described (4.3.2.3) in a cursory way for the Grays Harbor bay with such statements as “fog and swells caused by high winds with erratic current directions” normally around two knots but known to reach five knots. One statement (4.3.2.2), if not in error, is very confusing: “Winds recorded at Bowerman Airport (in Grays Harbor) are generally from the east or northeast during the winter and the west or southwest or directly from the south (less frequently) during the summer”. These are totally in error unless in an unconventional way are meant to be the direction the wind is blowing to, not from. These directions are very important as they are the creators of waves and the drivers of longshore currents which determine the direction beach sand travels or an oil spill would travel along the beaches. Weather, tides, high surf, extreme currents and wind as reported by mariners who use the bay, can make the entrance and exit to Grays Harbor anything but routine at times.

The constant daily changes in the flood and ebb tides change channel current characteristics making the entrance to the bay unpredictable. In general this area is shallow with sand movement that can cause changes in the actual channel location and depth. Two tidal exchanges per day are present and during extreme tides can result in exchanges around 12 feet between the high and low tides which in turn greatly influence water velocities. Weather conditions such as barometric pressure, wind and rainfall along with watershed runoff can be extreme and add considerable height to the tide. In addition, up river toward the docking area the discharge rate (flow) in the Chehalis River along with the tidal influence is characterized by seasonal variation, with sharp rises of relatively short duration from October to March. This corresponds to the period of heaviest rainfall (U.S. Army Corps

of Engineers 2003). That said the final sentence in the EIS casts these velocities and hydrological characteristics as "typical for a river and bay with similar topography and hydrologic characteristics". Those skippers who use the entrance channel on a frequent basis would probably not characterize it as typical and predicable.

Response GP836-8

The information presented in Draft EIS Chapter 4, Section 4.3.2.3, Water Flow, is intended to generally describe the range of water flow conditions that can occur within the study area. Draft EIS Appendix N, *Oil Spill Modeling*, presents in greater detail the assumptions used relative to wind conditions within the study area. Wind directions in the Draft EIS are identified as coming "from" the direction indicated. Wind conditions used in the oil spill modeling are further described in the notes section of Table 1 (see p. N-5 of Draft EIS Appendix N) and in the Master Response for Oil Spill Modeling Methods.

Comment GP836-9

The EIS does not detail an assessment of how much of a bay or near ocean crude oil spill could be cleaned up and how much would be inaccessible and left as probably a permanently inundated area. "Crude oil is a persistent oil. Bakken crude oil is a Group II oil and diluted bitumen is a Group IV or V oil (Section 4.3.1.2, Crude Oil)". This means they do not evaporate totally and can sink and remain like asphalt or rolled up like tar ballss. In addition, the unpredictable crude oil dispersion in response to tides, wind directions, fluvial velocities, temperatures and seasons also work against capture and clean up in an open coastal bay. Much of a spill might be impossible to recover. I seem to recall a US Coast Guard representative who estimated on the average only about 5-10% of a spill of similar types of crude oil could be recovered in a coastal estuary and the near shore waters. This in part is due to the asphalt like bitumen after a few hours or days sinks and becomes very difficult to find and recover. If a large cleanup was undertaken where would the oiled sediments and biotic elements be deposited? The EIS should detail these questions so people will know what they might have to live with when accidents, be they small or large, occur. The possible destruction of the benthic intertidal production should be assessed when the crude asphalt hardens on or in the sediments. There is also the real or perceived loss of product quality from a bay when the public learns an oil spill occurred. The EIS seems to lack detail on the possible destructive mess which could occur in the 'study areas'. If a train derails and explodes near Centralia or a tanker with several million gallons runs aground and breaks up at the mouth of Grays Harbor the EIS seems to take the view; 'it is to rare to consider', but state it could happen, or as stated indirectly, spills, etc. are, "anticipated to be low also [compared to study area] in the extended study areas" (5.2). What seems to be missing is the fact that the magnitude of one destructive incident could effect numerous people, infrastructure and property and environmental aspects and if even correctable take years to return to normal. A large spill or explosion might only happen rarely, but if and when it does and it could, people might be in for a very large, expensive and long lasting impact.

Response GP836-9

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different

types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods. To improve oil recovery in the case of a spill of crude oil that weathers, sinks or submerges, a new mitigation measure has also been added to Final EIS Sections 4.4.3, 4.5,3, and 4.6.3, for the applicant to ensure appropriate response equipment is available within 12 hours of a spill.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP836-10

If the proposed action should happen to be favored can we be sure of compliance to Washington State law requiring the operators of tankers and tank barges transporting hazardous substances to provide evidence of financial responsibility? Under RCW 88.40.020, Evidence of Financial Responsibility, tank vessels that transport oil in bulk as cargo must demonstrate financial responsibility to pay at least one billion dollars. With a few limited exceptions, federal law requires vessel operators (all types of vessels) to have a Certificate of Financial Responsibility for vessels over 300 gross tons using the navigable waters of the United States (33 CFR 138.15). The certificate is evidence to the U.S. Coast Guard that the vessel owner or operator can meet their oil spill removal obligations under the Oil Pollution Act should they spill oil into the navigable waters of the United States. Is there a price set for loss of estuary habitat?

Response GP836-10

Refer to the Master Response for Liability and Responsibility for information about response and cleanup of an oil spill.

Comment GP836-11

For those oil tankers traveling from a foreign port (such as Asia) to Grays Harbor are provisions being addressed to keep unwanted and potentially harmful species out of the bay. Non endemic species could be transported in bilge water or attached to the ship hulls? How are state and federal laws to be enforced? Have federal and state natural resource agencies such as WDFW set forth rules on this potential problem? Has cleanup or control costs been assessed and identified as available to address the escape of a harmful pest species?

Response GP836-11

Potential ballast water impacts on the aquatic environment are covered in Draft EIS Chapter 3, Section 3.4, *Plants*, and Section 3.5, *Animals*. The Washington State ballast discharge regulations (RCW 77.120.040) include reporting, monitoring, and sampling requirements of ballast water; all vessels must submit nonindigenous species ballast water monitoring data. Washington Department of Fish and Wildlife may also board and inspect vessels under WAC 220-150-033 without advance notice to provide technical assistance, assess compliance, and enforce the requirements of Washington State ballast water management program laws and regulations. Penalties and enforcement of not complying with the regulations are covered in WAC 220-150-080. To further minimize the risk of ballast water on vegetation communities and animals, the applicant would develop and implement a monitoring plan in consultation with Washington Department of Fish and Wildlife prior to the start of proposed operations (Section 3.4.7.1, Applicant Mitigation, and Section 3.5.7.2 Applicant Mitigation).

Comment GP836-12

Are the huge tanker vessels projected to create additional navigational problems in this relatively restricted shallow waterway and narrow twisted channel? How will the other vessels associated with commercial shipping and fishing or boaters in general be impacted by those behemoth oil vessels (Figure 3.17-3), which due to size, have the channel right of way over smaller boats?

Response GP836-12

Draft EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*, describes the systems that are in place to manage vessel traffic in Grays Harbor safely. Final EIS Section 3.17.4.4 provides additional information.

Comment GP836-13

Closing Comments: In my estimation the EIS draft downplays many of the potential difficulties and risks in transporting and transferring to storage tens of millions of gallons of toxic and explosive Bakken and Oil sands crude to load in to tankers which then travel the bay to open ocean. Based on this assessment little discussion and is available on how to mitigate (in fact the EIS seem to indicate not necessary) and deal with the cleanup and destruction that could result. The point is, a huge catastrophic spill, explosion and fire could happen and the EIS does not put any emphasize on what to do with this possibility. As stated above the new or greatly expanded use of the PS&P rail line and Grays Harbor estuary to transport large volumes of toxic explosive crude oil is a new use with little significant data to back up probabilities of spills or explosions. The draft EIS should clarify this and let citizens know these loaded trains are dangerous.

Response GP836-13

Draft EIS Chapter 4, Environmental Health and Safety, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an

incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, Impacts on Resources, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP836-14

Numerical simulation of tsunami generation and inundation was conducted to assess potential impacts and overtopping at the Westway Terminals LLC and Imperium Terminal Services Facilities. It was found that the berm surrounding the Westway Terminals LLC and Imperium Terminal Services could be overtopped. So much here depends upon the tsunami force, direction, tidal phase and height. They performed many force tests and the data is present. Just have to assume that this is a destructive possibility. The Fukushima tsunami should give all pause for concern and the image (right) reminds us of the height and power in the initial wave topping the sea wall:

Response GP836-14

Draft EIS Chapter 3, Section 3.1.4.3, Geological Hazards, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, Proposed Action, Operations, Earthquakes and Related Hazards, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events. The containment around the tanks is required for spill containment, it is not intended to be a berm for tsunami waves.

Comment GP836-15

As a former professor of geology, I cannot understand why this proposal is even considered. After the long trip from the Dakota and Canadian fields the volatile crude will travel by train nearly 60 miles from Centralia to be off loaded into the proposed storage facility at the moorage site in Aberdeen. Then reloaded into large tankers or tanker barges to traverse approximately 20 miles across the estuary and out the entrance of Grays Harbor. What could go wrong? The EIS, I feel, leads the reader to infer that the Grays Harbor crude oil add on is a relatively small aspect to the total scheme of moving incredible volumes of Bakken crude. Well, in fact it is but that should not be the measure to judge the possible damage which could be done. Instead, the EIS should point out how this proposal is a new series of actions over areas which puts a stretch of rail line and associated small populated areas and a very critical marine area in certain jeopardy of long term or permanent damage. The value of the nearshore marine habitat seems to be discounted as to the importance and possibility of long term destruction from the crude oil. Example would be the estuary food webs dependent upon the intertidal which are critical for higher tropic levels such as the Dungeness crabs, fish such as salmon, birds and shellfish. The north and south ocean beaches are productive razor clam digging areas. The popular Bowerman Basin national wildlife refuge (see map below), famous for the migrating shorebirds, is only a couple of miles from the proposed enlarged crude oil tank farms and very near the tanker route.

It seems ironic and just wrong that oil destined to end up in US refineries would be placed on tankers to traverse critical ecological habitat then to turn north or south to parallel our coast and then land back into another US port. This implies a certain disregard for the marine habitat. The EIS

should explain why domestic crude would not just stay on the BNSF train line for one of the northern refineries in Washington or even British Columbia. It appears this is a plan for a few to profit a little more quickly while potentially the citizens and environment of the Grays Harbor area could end up the big losers. The no-action alternative seems the most environmentally sound option and would not interfere much at all with the overall crude oil plan which is also foolish in terms of eventual carbon dioxide release. Furthermore, the chance of spills or explosions would be greatly decreased in the study areas as defined in the EISs and would not happen if the Imperium or Westway facilities are not expanded to establish the travel to, storage of and loading out the crude oil from the Bakken and oil sands fields.

Thank you for the chance to comment but I have to note; it seems the duel EISs make for a long confusing read for most people and that includes me.

Response GP836-15

Refer to the Master Response for Project Objective and Alternatives.

GP837, **Winn, Diane**

Comment GP837-1

My name is Diane Winn. Have you ever sat in your car frustrated waiting for a train to pass? Well, think about being on the other side of the tracks and waiting for emergency responders to reach you when you have a heart attack, your child has fallen down the stairs and lying on your floor unconscious, or your house is on fire.

In these life and death situations, seconds and minutes matter. This proposed project will present major consequences for emergency services with an increase of rail traffic that will cause long delays at rail crossing.

For example, according to the DEIS, Olympic Gateway Plaza is likely the crossing most impacted. Complete blockage to and from the complex will occur. The expected delays will typically be 35 minutes per train several times a day. This will dramatically affect the emergency responders.

These delays are a matter of life and death. In reviewing the safety fact sheet in the DEIS, the companies involved did not do anything to mitigate delay. The mitigation places responsibility for taking action on cities and drivers, and will do little more than send notification to emergency responders to change their routes.

However, this may not be a feasible approach since unlike oil trains, the timing locations of emergencies are not scheduled. The DEIS attempts to give impact near the site of the proposed projects. The trains delivering oil to Grays Harbor passes through dozens of cities along the route. I fear there will be impacts in these communities. It's important that there be a comprehensive EIS.

Response GP837-1

The Final EIS reflects revised proposed mitigation measures based on comments received on the Draft EIS. Refer to the Master Response for Mitigation Framework for an explanation of how mitigation measures were identified.

GP838, **Wireman, Ginger**

Comment GP838-1

I am extremely opposed to the expansiong of these terminals and the ability to move more oil through the state.

I am on the edge of the blast zone for one of the tracks according to explosive-crude-by-rail.org. Cottonwood elementary at 16734 Cottonwood Creek Blvd. in Kennewick (99338) is within the blast zone - the middle of the playground is 70 feet from the center of the tracks. My son's apartment is in the blast zone in Cheney as are half the dorms at Eastern WA University. It is disruptive and dangerous enough with the current number of trains. Providing additional capacity and allowing more trains is sheer insanity! The Ecology spills team could mobilize to Cheney - but the Tri-Cities would be screwed as minimum response time would be at least two hours (Yakima and Spokane are not close!)

I also vacation in Westport. An accident in that area would cause damage to the communities, the watersheds, the fishery and toursim. Any additional jobs would notbe worth the risk.

Response GP838-1

Comment acknowledged.

Comment GP838-2

After seeing the damage from the Japanese and Indonesian tsunamis I don't believe there is anything Imperium could do that could possibly mitigate the danger posed by a tsunami. For example, the Japanese puzzled over how the wave was 20 feet over their 14 foot sea wall, but post earthquake, the elevation of the land the wall was built on had dropped by 3 feet! I imagine any place that would be convenient to ship oil from would be in a liquifaction zone and unstable whether there was a tsunami following an earthquake or not. We must stop these trains.

Response GP838-2

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

GP839, **Wolfe, Diane**

Comment GP839-1

The Draft EIS for both Westway and Imperium contain multiple findings of significant and unavoidable adverse impacts which render approval of their permits to operate bulk oil facilities at the Port of Grays Harbor out of the question. Specifically, I call your attention to Sections 3.1.8, Earth; 3.7.9.1 Noise at grade 8 crossings; 3.12.8, Tribal resources; 3.17.8, vessel traffic unavoidable adverse impacts; 4.4.2.2 Explosions, "A large oil spill or explosion would likely cause unavoidable and significant adverse environmental impacts"; 4.4.4, Environmental Health Risks—Terminal (Onsite), specifically the finding that ," no mitigation measures would completely eliminate the possibility of a large spill or explosion, nor would they completely eliminate the adverse

consequences of a large spill or explosion"; 4.5.4, Rail transport impacts, "A large oil spill or explosion would likely cause unavoidable and significant adverse environmental impacts. As described above, the likelihood of a large spill or related explosion is low; however, the potential for significant consequences to the environment and human health in the case of a large spill or explosion is high…no mitigation measures would completely eliminate the possibility of a large spill or explosion, nor would they completely eliminate the adverse consequences of a large spill or explosion."; 4.6 Environmental Health Risks—Vessel Transport 4.7 Impacts on Resources "no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, fire, or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion"; 5.7 Extended Rail and Vessel Transport, "large oil spills, fires, or explosions would likely include unavoidable and significant adverse environmental impacts…no mitigation measures would completely eliminate the possibility of a large spill, fire, or explosion from rail cars carrying crude oil or hazardous materials nor would they completely eliminate the adverse consequences of a large spill, fire, or explosion."; And Chapter six discussing Cumulative impacts that would result from the incremental addition of the proposed action to impacts from past, present, and reasonably foreseeable future actions from individually minor, but collectively significant, actions that occur over time. Unavoidable and Significant Adverse Environmental Impacts include the potential for exposure to significant adverse noise, tribal resources, vehicle delays in Aberdeen, and increased vessel traffic causing disruption when commercial fishers are in the navigation channel. In conclusion the analysis notes that impacts from an incident from any of the cumulative projects would likely result in unavoidable and significant adverse environmental impacts. I urge you to support the no action alternative and deny the permits.

Response GP839-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP840, **Wolfe, Diane**

Comment GP840-1

I am commenting specifically on the economic impact sections of the draft EIS for Westway and Imperium found in Chapter 7 of both draft EIS. While there are many problems with the analysis, my primary focus will be on the lack of rigor in verifying underlying data and the superficial criteria underlying the analysis. One example of the lack of rigor is failure to request from the proponents a list of the jobs they see being created, those salaries and whether or not the jobs can be filled from the current job pool in Grays Harbor County.

Response GP840-1

Draft EIS Chapter 7, Section 7.1.4, *What are the potential impacts on economic conditions?* report projected employment generated under the proposed action. Employment projections were developed through the IMPLAN analysis (Appendix O, *Economic Impact Analysis*).

Comment GP840-2

One example of the incomplete criteria used to evaluate the economic impact is the use solely of a cost benefit analysis that does not take into account the costs to the citizens of Grays Harbor County compared to the benefits that might accrue to the citizens as a result of these proposals. Common business practice for any multi-million dollar project would necessitate both a Net Present Value (NPV) and Internal Rate of Return (IRR) analysis to aid in deciding whether to invest in these projects. Make no mistake, these companies are asking the citizens of Grays Harbor County to invest our capital in their enterprises. At first glance, investment decisions like these can seem to be "no brainers" – make the investment, and then collect the profit. But when the value of money received in the future is less than the value of that money now (because of market fluctuations and macroeconomic conditions) it's possible that the return from an investment might actually be worth less than the investment itself, once you have compared the value today and in the future. There are also other investment opportunities to consider. Would investing the money elsewhere provide a better return? Take the single issue of real estate values. These are important to citizens because your home is the largest single investment the average household makes and the operation of local government relies heavily on real estate taxes which are based on their monetary value. Study after study of real estate values in areas where oil terminals and rail transportation of petroleum have shown a decrease in real estate values from 5% in Cuyahoga County Ohio to 10% in Oslo, Norway to 51% in Houston, Texas and 72.3% in Albany, New York. The already fragile real estate market in Grays Harbor cannot tolerate those kinds of loses nor can the governments of Grays Harbor county tolerate those kinds of budget cuts. I urge you to support the "no action" alternative and deny the permits based on significant and unavoidable adverse economic impacts to the people of Grays Harbor County. Thank you

Response GP840-2

Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action , per City of Hoquiam SEPA policies and procedures (HMC 11.10.160).

GP841, **Wolfe, Diane**

Comment GP841-1

Good afternoon. My name is Diane Wolfe. I'm a resident of Hoquiam and Grays Harbor. I'm commenting specifically on economic impact sections of the Draft EIS for Westway and Imperium found in Chapter 7 in both Draft EISs.

While there are many problems with the analysis, my primary focus will be the lack of rigor and verifying the underlying data and the superficial criteria underlying the analysis.

One example of the incomplete criteria used to evaluate the economic impact is the use solely in the cost benefit analysis. This does not take into account the cost to the citizens of Grays Harbor County compared to the benefits that might accrue to the citizens as a result of these proposals.

Common business practice for any multi-million dollar project will necessitate both a net present value and a term rate of return analysis to aid in deciding whether to invest in these projects. And make no mistake, these companies are asking the citizens of Grays Harbor County to invest our capital in their enterprises.

At first glance, investment decisions like these can seem to be no brainers. We can make the investment, collect the profit. But when the value of the money received in the future is less than the value of the money now because of market fluctuations and economic conditions, it's possible that the return from an investment might actually be worth less than the investment itself once you have compared the value today and in the future.

There are also other investment opportunities to consider. Would investing the money elsewhere provide a better return?

Take the single issue of real estate values. These are important to citizens because our homes are the largest single investment the average household makes, and the operation of local government relies heavily on the estate taxes which are based on that monetary value.

Study after study of real estate guidance in areas where oil terminals and rail transportation of petroleum have shown a decrease in real estate value from five percent in the County of Ohio to ten percent in Norway to 51 percent in Houston, Texas.

I urge you to support the no action alternative and deny the permits based on significant and affordable adverse economic impacts. Thank you.

Response GP841-1

Draft EIS Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economic considerations, social policy implications, and the costs and benefits associated with the proposed action , per City of Hoquiam SEPA policies and procedures (HMC 11.10.160).

GP842, **Wolfe, Diane**

Comment GP842-1

My name is Diane Wolfe. I'm a resident of Hoquiam. The Draft EIS for both Westway and Imperium contain multiple findings of significant and unavoidable adverse impacts in which I concur.

Specifically I call your attention to sections 3.1.8.3., 3.7.9.1, noise and vibration; 3.12.8, tribal resources; 3.17.8, vessel traffic; 4.4.2.2, explosions; 4.4.4, environmental health risks, terminals on-site; 4.5.4, rail transport impacts; 4.6, environmental health risks, vessel transport; 4.7, impact on resources; 5.7 extended rail and vessel transport. And the entire Chapter 6 discussing incremental addition of the proposed action to impacts from past, present, and foreseeable future actions from the actions which appear to be individually minor, but collectively significant.

And these actions will occur over time. Unavoidable and significant adverse environmental impact include potential exposure to significant adverse noise, tribal resources, and increased vessel traffic causes destruction when the commercial fishers are in the navigation channel.

In conclusion, I urge you to support the no action alternative and deny the permits.

Thank you.

Response Comment GP

Response GP842-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP843, **Wolfe, John**

Comment GP843-1

October 22, 2015
TO: Washington State Department of Ecology.
RE: Increased rail traffic.
Increased fossil fuel transshipment through Washington State.
Shell Anacortes Refinery proposed crude by rail unloading facility
Westway and lmperium Terminal Services Expansion Projects EISs
c/o ICF International/ 710 Second Street, Suite 550 I Seattle, WA 98104

Dear Reviewer,

I have been unable to attend recent public meetings regarding "increased rail traffic" and am taking this opportunity to present my views on the matter.

Increased rail traffic elicits immediate concerns about rail bed stability, functional crossing guard mechanisms and wait times at intersections with other modes of transportation. The state of rail infrastructure is of great concern to all.

Greater concern should be placed on what drives the increased rail traffic, the explosion of the extraCtion industry's production and sale of the most polluting forms of fossil fuels imaginable; tar sand crude oil from Canada, tracked crude oil primarily from the Dakotas and coal from the Powder River region of Wyoming and Montana.

Response GP843-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Comment GP843-2

Summarizing the environmental pitfalls of the extraction, transportation and use of these fossil fuels is Simple; every piece of the cycle is a moral hazard to every living organism on our planet.

Technology has made the generalized use of fossil fuels obsolete. While chemical uses of carbon and organic compounds will probably always be needed, generalized use for energy is no longer the only and certainly not the best option available.

Multinational corporations are pushing additional development of fossil fuels for their enrichment only, ignoring the enormous and deadly biological issues associated with their "right" to extract the last shovel full of coal and last drop of oil to satisfy their shareholder and executive greed.

Response GP843-2

Comment acknowledged.

Comment GP843-3

BNSF railway, owned by Berkshire Hathaway and directed by the renowned investor Warren Buffet is hardly the apple pie American corporation based in Middle America Omaha that its marketer's would have us believe. They are a huge multinational company controlling a major portion of the world's re-insurance market.

Their investment in coal and tank car rolling stock has surged to serve the increased production of fossil fuels. While BNSF operates on a right of way which is virtually its private property, we and they should not forget that the property was provided by our government; from we the people, to develop our nation not destroy it.

Rail traffic, like airline traffic, has an admirable safety record per mile traveled. However much of its bridge infrastructure is one hundred years old. The existing rail bed cannot support passenger rail across the country, it cannot support increased commodity traffic. Evidence exists that corporate bottom line does not include safety modernizations. Here on Puget Sound many miles of track lie alongside one hundred .foot high glacial till bluffs that have a tendency to slide during our wet winter months. Increased traffic with longer trains carrying fossil fuels vibrating unstable bluffs is a recipe for environmental disaster.

Response GP843-3

Refer to Response to Comment GP843-1.

Comment GP843-4

Many corporations have plans for exporting these newly exploited reserves of obsolete fossil fuel energy sources.

The petroleum industry wants increased rail traffic to its proposed refinery expansion in Anacortes. New and expanded tank farms for export are being proposed in Grays Harbor and on the Columbia River. Export of domestic crude has been illegal for forty years but industry is confident that their political contributions will change that.

The coal industry wants new intermodal export facilities on the Columbia River and Strait of Georgia and in the meantime is content to export via the Canadian facility at Tsawwsen.

While the actions of multinational corporations imperil the world, the actions of the citizens of the world seek to maintain its habitability.

Increasing rail traffic to enhance the growth of obsolete and highly polluting energy sources is a moral hazard that the leaders of our nation cannot and must not ignore. Please send a message to the corporate world that the days of generalized use of fossil fuels, especially the Canadian bitumen, fracked American crude and western coal are over and those reserves best left in the ground.

Do not allow increased rail traffic of fossil fuels across Washington State. Do not allow export of an obsolete and deadly energy source to satisfy the greed of vestigial energy and transportation corporations.

Sincerely,

John Wolfe
20207 23rd Ave NW
Shoreline, WA 98177

Response GP843-4

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP844, **Wolff, Virginia**

Comment GP844-1

The findings in the DEISs for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and the environmental damage could be significant. The Draft EIS does not adequately address the impacts to the rail communities and waterbodies in the extended area. The DEIS inexplicably only studied the last 59 miles -- less than 5% -- of the route. The last few years have seen an enormous expansion in the amount of highly volatile crude oil shipped by rail, and there has been a corresponding spike in the number of derailments, fires and explosions. Turning Washington State into an oil export hub through these proposals and others will make it much more likely that the next oil disaster will happen here. This isn't just an issue for Grays Harbor, it's an issue for the entire state. I urge you to reject the oil terminals proposed in Grays Harbor because they will create the following significant and adverse impacts which cannot be avoided or mitigated and are unacceptable: A major train derailment is not a questions of "if" but "when."

Response GP844-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing

conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Comment GP844-2

The oil vapor pressure of Bakken crude cannot be lowered enough to prevent ignition. When tank cars are punctured during a derailment, gases rush out and find a spark. Non-yard derailment spills usually lead to fire. Oil train fires are likely to cause burns, deaths, and property damage - significant adverse impacts that cannot be prevented or mitigated. A U.S. DOT analysis predicts that oil and ethanol trains will derail on average 10 times per year during the next 20 years. If a single accident happens in a heavily populated area, DOT estimates that over 200 people could be killed, costing an estimated $6 billion. Both Bakken crude oil, and tar sands have ignited and exploded in previous train derailments.

Response GP844-2

Draft EIS Chapter 4, Section 4.5.2.2, *Fires or Explosions*, addresses potential risks related to fires or explosions associated with rail transport under the proposed action. Section 4.7, *Impacts on Resources*, describes potential impacts of fires and explosion.

Comment GP844-3

The DEIS must include the cost of emergency preparedness in all rail communities. NTSB says emergency response planning along the rail routes is “practically nonexistent”.

Response GP844-3

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities in the study area. For more information about the analysis of potential impacts on the BNSF main line, refer to the Master Response for the Geographic Scope of the EIS.

Comment GP844-4

Oil Spill Risk: An oil spill would have significant and adverse impacts that cannot be prevented or mitigated. The DEIS suggests that medium to large oil spills during rail transport are moderately to highly likely. This admission alone should make this proposal unacceptable. Health impacts of oil spills over land or water increase risks of neurotoxicity, cancer, lung disease, loss of cognitive function and endocrine disruption in humans. At best only 14% of the oil is recovered in a marine spill. Oil spilled off the coast would contaminate primary sources of seafood for residents, especially for tribal subsistence fisheries. Contamination includes toxins such as polycyclic aromatic hydrocarbons (PAHs), which accumulate in seafood, and increase risks to humans who eat it. Rail spills increase risk of contamination to wells, such as those in the Chehalis River Valley, municipal drinking water for Olympia and cities with a single source aquifer such as Spokane and Vancouver.

Response GP844-4

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that

would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or within Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP844-5

Traffic delays: Long traffic delays at rail crossings present major and unmitigatable consequences for emergency services. According to the DEIS, Olympic Gateway Plaza in Aberdeen is likely to be the at-grade crossing most impacted by delays from trains. Complete blockage to and from the complex will occur. Considering that expected delays will typically be 35 minutes per train several times a day, this will dramatically affect an EMS system where outcomes are dependent on response times of less than 10 minutes. These delays could be a matter of life and death in the event of cardiac arrest, heart attack, stroke or major trauma. This concern impacts not only Grays Harbor, but communities all along the rail corridor. There is no practical mitigation for these traffic delays. I urge you to reject the proposed Westway and Imperium oil terminals.

Response GP844-5

Final EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, reflects the addition of PS&P and Aberdeen Fire Department communication and response procedures for emergency access to areas blocked by a train under existing conditions. These procedures would apply under the proposed action as well and would reduce impacts on emergency access to the Olympic Gateway Plaza and Port of Grays Harbor areas.

GP845, **Wolff, Virginia**

Comment GP845-1

These comments supplement those previously submitted: tracking number 000000761. They concern air pollution and climate change impacts which cannot be adequately mitigated, along with other impacts the DEIS fails to consider.

Air Pollution: Onsite operations at oil terminals would release toxic pollutants, including diesel particulate matter, benzene, formaldehyde and toluene. During normal operations, according to DEIS documents, the risk of DPM inhalation increases at least 10 fold at project sites, putting workers at increased risk of adverse health effects. DPM and other pollutants associated with these projects increase risk of cancers, including breast and lung cancer; are associated with lower infant birth weight and increase risk of respiratory death; contribute to impaired pulmonary development for infants and children; increase the risk of asthma diagnosis exacerbations and related hospitalizations; contribute to neurodevelopmental disorders in children, and increase risks of acute and chronic obstructive lung disease, heart attack, stroke, systemic inflammation, and overall risk of disease and mortality.

Response GP845-1

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present analyses of cancer risk from emissions of diesel particulate matter related to the proposed action and cumulative projects, respectively. Final EIS Section 3.2 and Section 6.5.1.2 have been updated to reflect revised assumptions regarding rail operations (types and number of locomotives), based on information received from PS&P. The updated analyses predict lower emissions; the level of increased risk is not considered significant.

Comment GP845-2

Air toxins emitted by spills and derailments: Many people live and work within 1,000 yards of rail lines and terminals, the radius even the DEIS considers significant. Considering that oil trains and terminals would be located within population centers, these residents are at risk from inhalation of smoke and particulate matter in the event of a firey derailment. Smoke inhalation of the dense, heavy, suffocating type experienced in crude oil fires is a serious public health risk and cannot be completely eliminated as a risk to much of the Grays Harbor population or any other population at risk along the rail route.

Response GP845-2

Draft EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the potential impacts on human health in the event of an oil spill, fire, or explosion. Final EIS Section 4.7 has been revised to more fully describe these potential impacts.

Comment GP845-3

Climate Change: Climate change is the largest emerging health threat for this century. These projects release greenhouse gas (GHG) emissions that directly contribute to climate change. They also facilitate further emissions from the end-use of the crude oil, as it releases GHGs upon combustion. According to DEIS calculations, these two terminals would collectively result in annual release of approximately 74,000 metric tons of CO2. Climate change in our region is anticipated to result in increased heat-related illness, potency of allergies, health care costs, and extreme weather events. Expanded ranges of disease vectors are expected to result in increased spread of infectious diseases. There are better way to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming. Building more, big infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor.

Response GP845-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP845-4

The Draft EIS also failed to adequately consider a number of other important issues, including, but not limited to: the uniquely high combustibility of Bakken crude oil; the potential of even low-speed train car derailments, punctures, spills, fires and explosions; risks to endangered or listed species; statewide traffic impacts; full statewide economic impacts of an oil train disaster; quality of oil spill

cleanup; adequacy of insurance; rail inspection failures; risks of fire spreading beyond one train car or oil storage tank in the event of a leak, fire, or explosion; risks posed by outdated and insufficient oil barge contribution to carbon pollution and climate change. There is simply too much risk and too little reward from these proposals: Grays Harbor communities would take on the risk and oil companies would reap the profits, while Grays Harbor would become a throughway for oil going elsewhere. Much of what makes Grays Harbor special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters.

Response GP845-4

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Final EIS Chapter 4 reflects additional mitigation measures proposed to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

GP846, **Wonhoff, Taylor (Surfrider Foundation)**

Comment GP846-1

I write to express my concerns about the draft EIS that is currently out for public comment. I am from the Willapa Harbor area, and have spent significant parts of my life working and recreating on Grays Harbor. I have significant concerns about the adequacy of the draft EIS to protect the people and ecosystems in Grays Harbor and at sites along the rail transport line. My concerns boil down to three primary focal points. First, the proposed site at Grays Harbor is not suited to handle the expansion of the Westway and Imperium facilities. Second, the oil trains that will be tasked with transporting the crude oil to Grays Harbor are dirty and dangerous. Finally, the mitigation measures outlined in the draft EIS are insufficient to protect the environment and local economy. First, Grays Harbor is the wrong place to site the expanded oil terminals. Grays Harbor features a narrow shipping channel and strong, unpredictable currents that create dangerous conditions that make oil transport extremely risky. One spill in Grays Harbor could jeopardize the local economy, which relies heavily on the natural environment. Shellfishing, fishing, and many other industries are reliant on healthy, clean waters, and a single spill could irreparably harm those industries.

Response GP846-1

Draft EIS Chapter 4, Environmental Health and Safety, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, Impacts on Resources, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP846-2

Furthermore, the transport of the oil by train to the facility site will require 638 loaded train shipments each year, and an equal number of empty trains being moved out. Each trip will require road closures, which will disrupt so many other industries in the area. The timber industry, moving wood off the Olympic Peninsula, will be interrupted. This is just one example of the disruption that so many other industries feel—industries that hinge on a reliable, clear transportation network.

Response GP846-2

Operation of the proposed action at maximum throughput would add 458 unit train trips per year (half of which would be loaded and half of which would be empty), or 1.25 trips per day on average, along the PS&P rail line, compared to the approximately 1,100 train trips per year, or 3 trips per day on average, under the no-action alternative. Road closures are not required for existing rail traffic and would not be anticipated for rail traffic related to the proposed action.

Comment GP846-3

Finally, as a member of the Surfrider Foundation, I need to point out that a single spill will damage the reputation of Grays Harbor as a place to recreate. Dirty beaches will impact the surfing, kayaking, and other paddle sports industries; birders, beachcombers, and others will similarly choose to spend their time at other locations, and any dip in recreational dollars spent in places like Westport or Ocean Shores will be disastrous to those communities.

Response GP846-3

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP846-4

Second, oil trains are extremely dirty and dangerous. At least 10 oil trains have recently exploded in North America, and the explosion in Quebec demonstrated that explosions may occur in populated areas and directly harm local citizens. Tank car technology has not yet evolved to the point that oil transport by rail is safe; the so-called safer cars, the 1232 cars, have derailed and leaked oil and

burned a house. No oil train transports should take place to this facility until oil tank car technology is improved to better minimize the potential for derailments and oil spills.

Response GP846-4

Draft EIS Chapter 4, Section 4.5.3, What mitigation measures would reduce impacts related to rail transport? acknowledges the voluntary applicant measure for all new rail cars to meet or exceed the U.S. Department of Transportation Specification 117 design or performance criteria and the retrofitting of all existing tank cars in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 Federal Register 26643). However, as noted in Section 4.5.4, Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport? the risks cannot be eliminated.

Comment GP846-5

Furthermore, the rail line on which these oil shipments will be sent to these facilities is an ancient rail spur that was not designed to ship mile-long oil trains. Before any oil shipments take place, that rail spur must be rebuilt to 21st century engineering standards and be routed away from neighborhoods/cities, focal points of industry, and inland waterways.

Response GP846-5

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP846-6

Third, the identified mitigation measures are insufficient to adequately protect the people of Grays Harbor County and local ecosystems. In addition to the mitigation measures stated in earlier sections of this comment, the oil facilities should not be sited on the flats near to the water. They should be sited at a distance away from the water, so that if there is a spill, there will be a reduced chance that the oil will leak into the water. In every community/neighborhood along the rail line, there should be adequate emergency response personnel, equipment, and systems in place to assure immediate responses that will limit the damage that can be caused by a spill. Thank you. Taylor Wonhoff Tacoma, WA

Response GP846-6

Refer to the Master Response for Mitigation Framework.

GP847, **Wood, John and Polly**

Comment GP847-1

For national security, public safety, and environmental reasons wour family wholeheartedly objects to the shipment of bulk fossil fuels out of this country. There is no reason to to allow these projects to be built, only desire. The few beneficiaries gain only dollars. Those who lose, lose much more, even if only measured in dollar terms. Please do not allow these projects to proceed.

Response GP847-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP848, **Wood, Sandy**

Comment GP848-1

I live along the RR, hearing and feeling the heavy and speeding oil and coal trains pass our house frequently. We know that it is not if, but when, a train will derail, and explode, in our neighborhood. I do not understand why, knowing the danger, proved over and over again, the trains continue to threaten our lives, our future, our environment. Clean energy is our future, not dirty fossil fuels. Exporting those dirty fossil fuels only destroys our environment for the benefit of the big coal and big oil companies. We have fish and agriculture and tourism, and work diligently to clean our air and water. We do not want the Pacific Northwest destroyed!!

Response GP848-1

Comment acknowledged.

GP849, **Wood, Sandy**

Comment GP849-1

Thank you for listening to the comments of the public and hearing the concerns we have. We are not willing to accept the risks for the proposed Westway and Imerium oil terminals in Greys Harbor. The following significant and adverse impacts, as well as others not listed, cannot be avoided or mitigated, and are unacceptable.

1. The tank cars cannot be made crashworthy, and derailment spills are guaranteed to happen in the extended area many times a decade. Oil spills cannot be completely recovered. Crude oil contains benzene which CANNOT be recovered from the water.

2. Oil vapor pressure cannot be lowered enough to prevent ignition. When the tank cars are punctured during a derailment, the gases rush out and find a spark. Non-yard derailment spills usually lead to explosive fire. You cannot prevent or mitigate the loss of lives, property, and the damage to the environment. The damage done to the RR tracks themselves, prevents other train traffic. At-grade crossing damage prevents people from crossing, leaving homes, getting emergency assistance, etc.

3. Firefighters cannot protect themselves or the public from the explosions and fires. The blast zone is extensive. Again, this cannot be prevented or mitigated.
4. Oil trains block traffic, prevent passage on at-grade crossings by the public, school buses, emergency response vehicles. Other freight has to wait for their passage, meaning that agriculture products can be and are damaged, as they wait their turn for hours.
5. The oil trains stink as they pass, as well as shaking the ground. Our property was purchased BEFORE (1880's) the trains arrived in the 1920's, with home built before and during building of tracks. Our house has cracks throughout caused by the weight and speed of the coal and oil trains. It was built in the 1930's and was undamaged before the coal and oil trains started passing. BNSF has asked us to let them know when the windows rattle so they can check the tracks. The RR tracks were built for shorter, slower, less heavy trains!
6. An oil terminal will destroy the quality of life for the community, the waterways, and the environment. No community with oil terminals is a desirable place to live. This loss of value cannot be mitigated.
7. Hydrogen sulfide, escaping during the loading of crude oil into marine vessels, deadens your sense of smell, then kills you, as it is trapped in low-lying pockets. No guarantee can be made for the vapor combustion units. No prevention or mitigation can be guaranteed.
8. Construction jobs for an oil terminal are a short-term job increase. The loss of jobs, lives, homes, prosperity, thereafter cannot be mitigated.
9. The cost of emergency preparedness is beyond calculation, not covered by insurance, and impossible to create along the miles in danger.
10. Spill cleanup delays are for generations, with the damage done to water, air, environment not ever back to pre-spill.

The Pacific Northwest does not wish to be a location for fossil fuels. Our fisheries and forests and water and agriculture and cannot be sacrificed for the benefit of BIG OIL, making profits as they export the oil, destroying our lives. The cost to us cannot be mitigated or avoided. I do not choose to live in fear of the oil trains destroying our lives. I do not choose to live with oil terminals. The Pacific Northwest is a treasure, and should be treated with respect, not contempt. Greenhouse gases need to be decreased, not increased. Please deny these and any other oil terminals proposed in the Pacific Northwest!

Response GP849-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action, including derailment of trains carrying crude oil. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion from train derailments. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions,

such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Final EIS Chapter 4 has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports.

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, addresses potential impacts on vehicle delay and emergency vehicle access. Final EIS Section 3.16 clarifies proposed mitigation and potential significant and unavoidable impacts.

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources. As described in Draft EIS Chapter 3, Section 3.2, *Air*, based on air quality modeling for conducted by the applicant, onsite emissions of toxic air pollutants related to routine operations of onsite stationary sources, including hydrogen sulfide, would be below the state thresholds identified in WAC 173-460-150. The Final EIS section reflects updated estimates based on a review of recently published Bakken crude oil data. These emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and applicant mitigation that would reduce potential impacts on air quality. Rail and vessel operators are required to adhere to all applicable regulatory requirements intended to ensure the safe passage of freight.

GP850, **Woods, Keith**

Comment GP850-1

I strongly oppose shipping crude oil from the Port of Grays Harbor. The environmental risks on the rail line and facilities so close to places like the Gateway Mall, an active fishery, and the National Bird Sanctuary does not make sense and should not move forward. The threat to our estuary, beaches, fishery, shore birds, and the local economy is simply not worth the risks involved and certainly not to encourage the extraction and shipment of bakken crude or other fossil fuels. Bio diesel already shipped from our port presents too great of a risk already given the seismic nature of this area. Please deny permits to move forward with these projects.

Response GP850-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP851, **Woodward-Rice, Claudia**

Comment GP851-1

I would like to associate my comments with those of JB McCrummen, attached below. The DEISes as written are inadequate, should be rejected and/or re-written. Meanwhile permits should be voided and the projects cancelled.

Comments on Draft EIS for Proposed Oil Terminals in Grays Harbor County, Washington

FAILURE OF DRAFT EIS; CALL FOR REJECTION DRAFT EIS AS WELL AS PROPOSED EXPANSION

The Draft EIS on the expansion of bulk liquid storage terminals (petroleum, other flammable and/or toxic liquids by Westway Terminal Company LLC and Imperium Terminal Services and located at the Port of Grays Harbor Terminal 1 is filled with misleading as well as erroneous information, missing analyses, a lack of known analytical methodology for both draft EIS and final EIS documents, artificial "boundaries" that purposely limit comments or facts about the impacts of oil trains to just Grays Harbor county, and does not address macro environmental as well as economic impacts of the proposed expansions due to the fossil fuels.

Based on the above summary, it is clear from the Draft EIS that the preparing firm and its employees and consultants have a bias toward Westway and Imperium. The Draft EIS not only violates rules and regulations governing the preparation of both a draft and final EIS, but was completed by an unqualified firm, if not a firm influenced by Westway, Imperium, and other fossil fuel companies or trade associations.

Therefore, the entire Draft EIS must be rejected as faulty and therefore, the proposed expansion rejected.

If, instead Hoquiam and DOE decide not to reject the project, then a new Draft EIS must be completed and by a different professional, non-biased firm, at the expense of the proposing companies. Neither Westway nor Imperium can be involved in the selection of a different firm or in the preparation of the new Draft EIS.

Response GP851-1

The commenter does not provide sufficient details to allow for response. Refer to responses to more specific comments below.

Comment GP851-2

I am submitting additional comments to illustrate the appalling nature of the Draft EIS.

<u>Comment Section: Draft EIS- Westway & Imperium Proposed Bulk Liquid Storage Terminals</u>

As noted in my introductory comments, I am calling on the Department of Ecology and City of Hoquiam to reject both the Draft EIS and the proposed expansion of oil and other petroleum

products by Westway & Imperium. The Draft EIS does not meet the minimum legal standards of the required EIS nor does it meet the objectives outlined on the DOE Comment Web Page that states the Draft EIS must "identify existing environmental conditions, potential impacts on the environment and community, and mitigation measures to reduce or avoid the potential impacts."

The Draft EIS is prejudicial, non-responsive, and does not address analysis of critical impacts of the proposed expansion. As a result, the Draft EIS does not fully complete a Draft EIS, especially on critical strategies to avoid or mitigate environmental accidents or disasters, including:

OIL TRAINS AND TANK CARS

* The terminals would be fed by about sixteen loaded oil train deliveries every week (on average more than two per day) with more than 5 million gallons of oil daily (one barrel = 42 gallons) per day.

* The tank cars cannot be made crashworthy. Non-yard oil train derailment spills will occur, as outlined in recent studies focused on the Columbia River rail line. An oil spill would have significant and adverse impacts that cannot be prevented or mitigated. At best only 14% of the oil is recovered in a spill. Crude oil contains benzene which cannot be recovered from the water. The Draft EIS does not address this topic.

Response GP851-2

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* presents the analysis of risk of oil spills, fires, and explosions related to rail transport related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Section 4.5.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident along the PS&P rail line. Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including a discussion of the potential longer-term impacts. Final EIS Section 4.3, *Risk Considerations,* reflects additional information about factors influencing cleanup.

Comment GP851-3

* The oil vapor pressure cannot be lowered enough to prevent ignition. When tank cars are punctured during a derailment, gases rush out and find a spark. Non-yard derailment spills usually lead to fire. Oil train fires are likely to cause burns, deaths, and property damage. Burns, deaths, and property damage are significant adverse impacts that cannot be prevented or mitigated. The Draft EIS does not address this topic.

Response GP851-3

Draft EIS Chapter 4, Section 4.5.2.2, *Fires or Explosions*, addresses potential risks related to fires or explosions associated with rail transport under the proposed action. Section 4.7, *Impacts on Resources*, describes potential impacts of fires and explosion.

Comment GP851-4

* Until all the tank cars have thermal jackets and high capacity pressure relief valves, tank cars sitting in a pool fire, are likely to explode. Firefighters cannot protect the public in those cases. Oil train explosions will be impossible to prevent for nearly a decade. The Draft EIS does not address this topic.

Response GP851-4

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport,* discloses voluntary measures and design features, proposed applicant mitigation, and other measures that would further reduce environmental health and safety impacts from rail transport related to the proposed action, in addition to regulatory compliance and best practices. To the extent possible, within the framework outlined in the Master Response for Mitigation Framework, measures addressing the need for more coordinated and focused planning include the role of the applicant as appropriate. However, as noted, no risks can be eliminated and, depending on the circumstances, significant impacts could occur.

Comment GP851-5

* Oil trains block traffic. They interfere with commerce, emergency response and school buses. The adverse impacts will be significant. These impacts cannot be mitigated. The Draft EIS does not address this topic.

Response GP851-5

Draft EIS Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, addresses potential impacts on vehicle delay and emergency vehicle access. Final EIS Section 3.16 clarifies proposed mitigation and potential significant and unavoidable impacts.

Comment GP851-6

IMPACT ON CLIMATE CHANGE & AIR POLLUTION

* When-not if-terminal containers of rail cars, due to vapor combustion, fail, there will be dramatic air pollution. The city of South Portland, Maine has banned the trans-loading of crude oil into marine vessels for that reason. Hydrogen sulfide first deadens the sense of smell, and then people and animals die. The Draft EIS does not address this topic.

Response GP851-6

The marine vapor combustion unit and the storage tanks' internal floating roofs, described in Chapter 2, *Proposed Action and Alternatives*, would reduce emissions of criteria and toxic air pollutants from onsite stationary sources.

As described in Draft EIS Chapter 3, Section 3.2, *Air*, emissions of toxic air pollutants related to routine operations of onsite stationary sources, including hydrogen sulfide, were modeled to be below the state thresholds identified in WAC 173-460-150. The Final EIS section reflects updated estimates based on a review of recently published Bakken crude oil data. These emissions are subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which

would include enforceable requirements specifying emission limits, reporting, and record keeping for onsite stationary sources. Refer to the Draft EIS for a list of permit conditions and applicant mitigation that would reduce potential impacts on air quality.

Comment GP851-7

* The proposed oil terminals will lead to a net increase of greenhouse gas emissions. The net global oil production could increase. This is additive. This is not simply replacing one oil source for another. The increases cannot be mitigated. The Draft EIS does not address this topic.

Response GP851-7

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and for information on the likely destinations of crude oil shipped through the proposed facilities.

Comment GP851-8

DRAMATIC IMPACT ON RIVERS, FORESTS, COMMUNITIES, AND GRAYS HARBOR

* Increased train traffic of at least 16 more oil trains per week. With increased oil trains there will be an increase in the risks of oil train derailments and oil spills into the Chehalis River, Grays Harbor, (and of course the Columbia, Snake, and other rivers "outside" of the artificial boundary of the Draft EIS) and local communities near the rail trains. The increases cannot be mitigated. The Draft EIS does not address this topic.

Response GP851-8

Refer to Response to Comment GP851-2.

Comment GP851-9

Lower property values- residential, commercial, forest, with increased human diseases. The Draft EIS does not provide a fair and balanced economic analysis (that is, an accepted methodology for economic impacts) of the proposed impacts on property values along the rail line, from oil spills, conversion of the Grays Harbor diversified economy to an "oil economy", increased pollution and the increased illness due to the oil pollution, nor the impact on human health and animal life along the rail line. The topics cannot be mitigated. The Draft EIS does not address this topic. The Draft EIS does not address this topic.

Response GP851-9

Final EIS Section 4.7, *Impacts on Resources*, has been revised to more fully describe potential human health impacts. Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values. Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP851-10

* The Cost of Emergency Preparedness in all rail communities. NTSB says emergency response planning along the rail routes is "practically nonexistent". The Draft EIS does not address this topic.

Response GP851-10

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities in the study area. For more information about the analysis of potential impacts on the BNSF main line, refer to the Master Response for the Geographic Scope of the EIS.

Comment GP851-11

* Spill Cleanup delays. For example, it took decades for the spill to be cleaned up in the town of Skykomish, WA. The Draft EIS does not address this topic.

Response GP851-11

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts on resources that would be expected as a result of an oil spill; the section has been revised to acknowledge the potential for more lasting impacts as the result of a spill.

Comment GP851-12

* Grays Harbor. A single major spill could devastate the area's maritime economy, productive fisheries, tribal treaty rights and spectacular coastal waters.

Response GP851-12

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on Grays Harbor. Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Comment GP851-13

The twelve mile long Grays Harbor shipping channel is narrow, shallow, subject to strong currents and has limited staging area for ships and tugs.

Response GP851-13

State-licensed pilots work with the U.S. Coast Guard to avoid any risks associated with vessel transits during periods of poor weather and/or sea state conditions. Refer to Final EIS Chapter 3, Section 3.17.4.4, *Vessel Traffic Management*.

Comment GP851-14

If both terminals were expanded, 638 tankers and barges of oil would need to twice traverse Grays Harbor every year for a minimum of 1276 trips per year. Of course, there could be more trips.

Response GP851-14

As described in Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, the proposed action would result in a maximum of 238 vessel transits under maximum throughput operations; half of these trips would be laden vessels. As described in Chapter 6, *Cumulative Impacts*, the cumulative projects—the proposed action, the REG (formerly Imperium Terminal Services) Expansion Project, and Grays Harbor Rail Terminal Project—would add 758 trips.

Comment GP851-15

There is no analysis of the possibility of future dredging the channel and the impact on wildlife, fisheries, and the disposal of the dredged materials.

Response GP851-15

The proposed action would not require dredging or deepening of the navigation channel to accommodate proposed vessel traffic.

Comment GP851-16

The Draft EIS analysis of the impact on the Chehalis River, particularly as it moves into the Grays Harbor, is completely faulty-since it does not use data from the Chehalis River and Grays Harbor.

Response GP851-16

Refer to the Master Response for Oil Spill Modeling Methods.

Comment GP851-17

The Draft EIS does not address these topics.

* Transition to Green Energy Economy – not included due to bias by Draft EIS Preparer(s)

Governor Inslee has signed an executive order to reduce carbon emissions in Washington. The proposed expansion would violate that Executive Order.

The Draft EIS purports to provide an economic analysis of the proposed expansion and the value to the local economy. This analysis is clearly bias toward fossil fuels and this expansion, without providing an objective economic analysis, including negative impacts of the proposed expansion and alternatives in the Green Economy-like manufacturing products for the conversion to green energy

resources. Of course, the State of Washington provides significant incentives for green economy employers-like for solar component manufacturing.

The Draft EIS does not address these topics.

SUMMARY

In summary, the above points are just a few of the inadequacies of the Draft EIS. They illustrate the unprofessional bias and misconduct of the preparers of the document including a bias toward fossil fuels and prejudice against local communities.

The Draft EIS must be rejected as must the proposed expansion. If DOE and Hoquiam don't reject the project on its face and based on the inadequacy of the Draft EIS, then a new Draft EIS by a different, professional and objective organization must be completed.

As Submitted by JB MCCRUMMEN, ROCHESTER, WA 98579 11/30/2015

Response GP851-17

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP852, **Woodward-Rice, Claudia (Coalition for Infrastructure)**

Comment GP852-1

The massive size of these DEISes combined with the frequent errors, omissions, and contradictions included, appear to be intended to intimidate and overwhelm the public. We will not be cowed into submission by this cynical tactic.

Response GP852-1

The commenter does not provide sufficient details to allow for a response.

Comment GP852-2

The proposed oil terminals in Grays Harbor would create drastic devaluation of real property along the rail route. In one recent study, done at the University of California at San Diego, it was concluded that for every 10 million gross tons per mile, you can expect a 1 percent drop in your property value. Using this standard formula and applying to Grays Harbor and the expected oil traffic, can we assume up to a 20 to 30 percent drop in value? Provided all three companies interested ramp up production, it may turn out to be much worse for homes or businesses within a half mile of the tracks. This is a "taking" of private property by private industry under the color of authority (Ecology)—so who will pay us for lost value? Proposed oil shipping terminals and the dirty, dangerous oil trains, storage tanks, tankers and barges that would come with them puts the health and safety of people, the local economy, and our ocean and coastlines at risk.

Response GP852-2

Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values.

Comment GP852-3

There is no way to mitigate the risks and dangers of these crude oil terminals. Grays Harbor communities would take on the risk, oil companies would reap the profits, and Grays Harbor would become a throughway for oil going elsewhere to places like California and even overseas. Westway and Imperium, two of three proposed oil terminals for Grays Harbor between Aberdeen and Hoquiam would have the combined capacity to handle nearly 127,000 barrels, or more than 5 million gallons of oil daily (one barrel = 42 gallons) per day. The terminals would be fed by about sixteen loaded oil train deliveries every week (on average more than two per day). Wrong place for oil terminals: Much of what makes Grays Harbor special would be at risk. The narrow, shallow shipping channel and strong currents put Grays Harbor at high risk of an oil spill. A single major spill could devastate the area's maritime economy, productive fisheries, tribal treaty rights and spectacular coastal waters.

- The Washington State Department of Fish and Wildlife stated "Grays Harbor is an area particularly sensitive to the adverse effects of oil spills."
- A major oil spill could devastate marine resource jobs which support more than 30% of Grays Harbor's workforce according to a 2013 study by the University of Washington.
- An economic study commissioned by the Quinault Indian Nation found that a major oil spill could put more than 150 tribal commercial fishermen out of a job, resulting in a direct loss of as much as $20 million in wages and up to $70 million in revenue for affected businesses.
- If built the two terminals together could store an astounding 72 million gallons of crude, or the equivalent of 2526 oil tank cars.

Response GP852-3

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP852-4

Grays Harbor sits in a major earthquake and tsunami zone. Geologists say the odds of a "big" Cascadia earthquake happening in the next 50 years are approximately one in three. The odds of the

"very big" one are roughly one in 10. • According to the U.S. Geological survey the overdue earthquake could produce waves from 20 feet to more than 100 feet high. We can expect that wall of water would topple storage tanks washing away all the oil which could possibly ignite.

Response GP852-4

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP852-5

Dirty and dangerous oil trains: The alarming safety record of oil trains means an explosive oil train derailment may be a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line from Hoquiam to Centralia and all the way to the oil source in North Dakota and Alberta, Canada.

Response GP852-5

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Comment GP852-6

We are concerned that the DEIS as presented apparently recommends and believes that the staffing of 30.2 FTE employees with a tax-supported budget of $11,527,000 can solve and mitigate an endless litany of risks.

Response GP852-6

Refer to the Master Response for Purpose and Focus of the EIS.

GP853, **Young, Robert**

Comment GP853-1

Also consider the impacts on the climate of burning this oil somewhere on this planet.

Response GP853-1

Draft EIS Chapter 3, Section 3.2.5.2, *Proposed Action*, presents greenhouse gas emission estimates of onsite operations, offsite transport, and combustion of crude oil at maximum throughput capacity.

Comment GP853-2

Please consider the increased dangers of transporting highly flammable and toxic oils by rail and ship across Washington and the seas.

Response GP853-2

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action in the study area. Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

GP854, **Young, Saphronia**

Comment GP854-1

Both of these projects pose unacceptable environmental risks. Noise, vibration and traffic are serious enough to table each project, but the risks associated with spills are completely unacceptable. The risk of a spill reaching water has been rated "very low." I actually question that, given the proximity to the water. However, the environmental impacts when it does reach water are rated as extreme, which is undoubtable. For an old technology that pollutes the planet once in use, why are we willing to take such risks? Our marine environment in and around Washington state are already so fragile and at risk. I am completely against these projects, although aware that they would probably create some jobs. We need to create jobs in the green energy sector, not 19th century coal and oil dirty energy. We have a responsibility to our children and to the planet. Do not move forward with this project.

Response GP854-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP855, **Yun, Christine**

Comment GP855-1

I am opposed to the development of infrastructure that will require the transport of crude oil through a National Scenic Area. The transport of crude oil in railroad cars is not safe and the odds of having crude oil spills in this national treasure and in populated areas is too high a risk for the return on a source of energy that is not a viable long-term energy source. I oppose the development of both terminals.

Response GP855-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP856, **Zeigler, Bob**

Comment GP856-1

1102 A Creekwood Ct. SE Olympia, WA 98501 (360) 570-0848 ZeiglerBob@msn.com October 1, 2015 RE: Elma Public Hearing: Westway and Imperium crude oil-by-rail terminal EIS Dear Responsible Officials: I know you cannot make any permit decisions until all information is in and Impact Statements are final but I do hope you will explore all potential impacts especially secondary impacts of these proposed actions. SEPA Rules state: (d) A proposal's effects include direct and indirect impacts caused by a proposal. Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as a precedent for future actions. For example, adoption of a zoning ordinance will encourage or tend to cause particular types of projects or extension of sewer lines would tend to encourage development in previously unsewered areas. (WAC 197-11-060, Content of environmental review (4) Impacts). The indirect or secondary potential impacts including increased risk of spill, accident and potential loss of life and public resources (water quality to fish and wildlife) to tribal resources occur from the point where trains are loaded with oil to the point of your permitted facilities. The fact that the previously developed site is enhanced for oil storage and transport sets in motion the movement of oil by rail from point of loading to the sites being proposed.

Response GP856-1

Draft EIS Chapter 5, Extended Rail and Vessel Transport, addresses potential impacts from rail and vessel transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Final EIS Chapter 5 further describes the potential risks associated with rail transport in this area.

Comment GP856-2

In addition to increased spill or accident the impact of facilitating increased emission of CO2 from consumption of these resources has cumulative impacts on the climate of our planet. Scientists tell us that to reduce risk of most severe climate consequences we need to leave 80% of the planet's fossil fuels in the ground. Pope Francis in his recent encyclical, Laudato Si, calls on all on the planet to drastically reduce carbon emissions and convert from the use of fossil fuels. This has become a major moral issue as well as one of science.

Response GP856-2

Comment acknowledged.

Comment GP856-3

I also urge you to check with your legal staffs to assess, in light of railroads incurring no legal risks, what potential legal risks do the City and the state of Washington incur if one or both of these facilities are permitted and a train has a serious accident for example in Hoquium or even in City of Spokane or Tri Cities? While the railroad does not, both the City and the State have the responsibility for public health, safety and welfare and SEPA responsibility for a safe and healthy environment. Should an accident occur as happened in Quebec where 47 lives were lost, who pays especially when so many concerns have been raised in the environmental review and permitting process? I will

provide additional comments on your draft EIS after my final review. Thank you very much, Bob Zeigler

Response GP856-3

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP857, **Zeigler, Bob**

Comment GP857-1

Department of Ecology and City of Hoquiam, RE: Westway and Imperium Oil Expansion Projects DEISs Your form provides insufficient space for comment. See attached documents for comment

Department of Ecology and City of Hoquiam,

RE: Westway and Imperium Oil Expansion Projects DEISs

Thank you for preparing a detailed Environmental Impact Statements for these two oil storage and shipment facilities and the opportunity for Public Comment.

State of Washington through Washington State Department of Ecology and City of Hoquiam as SEPA Leads are responsible for accurate presentation of direct, indirect and cumulative impacts of these proposals as well as mitigation measures to lessen impacts. The State and City are responsible for Public Health Safety and Welfare and protection of air quality, water quality, and public resources and human health through any permits that might be issued for these projects at completion of environmental review. Since the potential impacts from both projects are similar, I will offer one comment letter and submit it for both projects.

Since projects are on previously developed lands, greater potential for impacts are off-site and secondary in nature. They include potential risks of accident, spills, derailment that exists because of distance of volatile Bakken oil and/or jet fuel on rail line infrastructure that is aged, crosses waters and hydric soils and in areas that experience earthquakes. This is complicated by a limited rail oversight and federal enforcement and penalty action needed for significant risk reduction because of Congressional limitation on railroads.

Response GP857-1

Refer to the Master Response for Purpose and Focus of the EIS.

Comment GP857-2

Associated with these projects are the secondary impacts of discharge of greenhouse gases when oil and other projects are consumed. While the EISs explain carbon emissions associated with construction and even operation, they do not cover impacts of product consumption facilitated by these projects. These projects alone will facilitate oil consumption and make it more difficult to limit

gashouse gas emissions so temperatures are not raised above the 2 degree Centigrade levels. See Christophe McGlade and Paul Ekins, Nature, 517. Pp 187-190, January 8, 2015:

"Policy makers have generally agreed that the average global temperature rise caused by greenhouse gas emissions should not exceed 2 °C above the average global temperature of pre-industrial times1. It has been estimated that to have at least a 50 per cent chance of keeping warming below 2 °C throughout the twenty-first century, the cumulative carbon emissions between 2011 and 2050 need to be limited to around 1,100 gigatonnes of carbon dioxide (Gt CO2)2, 3. However, the greenhouse gas emissions contained in present estimates of global fossil fuel reserves are around three times higher than this2, 4, and so the unabated use of all current fossil fuel reserves is incompatible with a warming limit of 2 °C. Here we use a single integrated assessment model that contains estimates of the quantities, locations and nature of the world's oil, gas and coal reserves and resources, and which is shown to be consistent with a wide variety of modelling approaches with different assumptions5, to explore the implications of this emissions limit for fossil fuel production in different regions. Our results suggest that, globally, a third of oil reserves, half of gas reserves and over 80 per cent of current coal reserves should remain unused from 2010 to 2050 in order to meet the target of 2 °C. We show that development of resources in the Arctic and any increase in unconventional oil production are incommensurate with efforts to limit average global warming to 2 °C. Our results show that policy makers' instincts to exploit rapidly and completely their territorial fossil fuels are, in aggregate, inconsistent with their commitments to this temperature limit. Implementation of this policy commitment would also render unnecessary continued substantial expenditure on fossil fuel exploration, because any new discoveries could not lead to increased aggregate production".

Response GP857-2

Draft EIS Chapter 3, Section 3.2, *Air*, and Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, present estimates of greenhouse gas emissions from onsite operations, offsite transport within Washington State, and combustion of maximum annual throughput of crude oil related to the proposed action and cumulative projects, respectively, in the context of emission inventories and reduction goals. Final EIS Section 3.2 and Section 6.5.1.2 have been revised to include emissions from offsite transport from the likely source of crude oil to the furthest likely refinery destination. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

Comment GP857-3

There will be oil trains on the tracks that would not be there without these projects. There is very little railroad liability. For example in the West Virginia oil train explosion as recent Federal Railroad study has shown was the result of gross neglect of repair of cracked rails by the railroad company and the largest fine they could be assessed is $25,000. Does legal liability fall to the State of Washington or the City of Hoquiam if these projects are permitted and accident and explosion results as happened in Quebec and these trains are enroute because of these oil storage facilities in Hoquiam? Does any legal liability fall to the City and/or State that are charged with protection of public health safety and welfare?

Response GP857-3

Draft EIS Chapter 4, *Environmental Health and Safety*, Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents

for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP857-4

The following comments are on the two drafts:

DEIS WESTWAY EXPANSION PROJECT

Summary

The EIS accurately discusses potential direct impacts on critical public resources in the area. Bowerman Basin Grays Harbor National Wildlife Refuge which is of international significance to shorebirds on migration and Chehalis River Surge Plain Natural Area Preserve and eelgrass are critical areas.

It also accurately states: "The project site is located in an area that has the potential for moderate to severe earthquakes." Occurance of severe earthquakes are every 300 years and major event could happen at any time. At Elk River in some of the erosion on can find trees below salt marsh when soils collapsed in a major past event.

Response GP857-4

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP857-5

Your documents downplay the risk of spill or explosion but do point out: "A large oil spill, fire, or explosion would likely cause unavoidable and significant adverse environmental impacts. The likelihood of a large spill or related fire or explosion is relatively low; however, the potential for significant consequences to the environment and human health if such an incident were to occur is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. No mitigation measures would completely eliminate the possibility of an incident, nor would they completely eliminate the adverse consequences of an incident. There have been a number of oil train explosions and derailments in the last two years and even the US Military has expressed concern. See Rachel Maddow Show 5/13/15 US Military Concerned About Oil Train Proximity to Missile Sites: http://www.msnbc.com/rachel-maddow-show/watch/oil-trains-alarmingly-near-nuclear-missiles-444408387996 Also (S-23, S-30 and P 4.5-3 and 4.4-4 and 4.5-16) Same comment.

The document accurately discusses the potential risk from increased frequency but again somewhat downplays this. Note not all the train derailments and explosions are the result of speed (Same comment for P 4.5-3 and 4.4-4.

"The increased number of rail trips and vessel trips related to the cumulative projects pose a greater potential for more frequent spills of bulk liquids relative to the proposed action alone. In general, fires or explosions occur as the result of some but not all oil spills. An incident is most likely to occur during transport when higher speeds provide enough energy to generate a spark. Because allowable train speeds along the PS&P rail line and vessel speeds in the harbor are low, the likelihood of a fire

or explosion during transport is reduced, although the potential for environmental harm if a fire occurred with or without an explosion could be quite severe."

Response GP857-5

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 to reduce the likelihood of a spill reaching the environment and the potential impacts if an incident occurs at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion. Refer to the Master Response for Risk Assessment Methods for more information about the data, assumptions, and methods used in the risk analysis. For more information about the development and implementation of mitigation measures, refer to the Master Response for Mitigation Framework.

Comment GP857-6

The document states: **"Cumulative Impacts** Because the cumulative projects, including the proposed action, would have unavoidable and significant adverse environmental impacts on noise, tribal resource, vehicle traffic, and environmental health and safety, the proposed action would contribute to unavoidable and significant adverse environmental cumulative impacts on these resources." Note also significant impacts to: water quality and public fish, wildlife and recreation **(S-35).**

Response GP857-6

The statement cited by the commenter refers to potential impacts from construction and routing operation of the proposed action. Potential unavoidable and significant impacts related to risk of an incident are described the *Environmental Health and Safety* subheading.

Comment GP857-7

Note your document states: "To reduce the risk of spills affecting high numbers of migratory birds during peak spring migration (typically 2 weeks), the applicant will coordinate with the City of Hoquiam to receive advance notice of the date for the annual Grays Harbor Shorebird Festival. The applicant will halt crude oil vessel loading operations for a period of 2 weeks each year overlapping with the event." (S-39) (Note a large spill a month or a year ahead of the arrival of shorebirds would have serious consequences for them if oil hits Bowerman Basin and surrounding areas and there are other resources impacted such a amphipods and food and structure for numerous estuarine and marine species.)

You state: However, a spill on an individual animal would be unlikely as the animal would have already cleared from the area due to human and equipment presence, and the spill would likely be small and would be contained and cleaned up quickly per operating and maintenance protocols for rail operations and maintenance spills." Is this really an accurate statement? Is that the experience is

past spills in extremely high value resource areas? What about impacts to amphipod Corophium salmonis, the tube dwellers so important as a food source there?

Response GP857-7

The cited text from Draft EIS Chapter 3, Section 3.5.5.2, *Proposed Action*, refers to potential impacts of routine operation of the proposed action. The potential for widespread environmental damage related to the risk of oil spills, fires, and explosions is addressed in Chapter 4, *Environmental Health and Safety.* Section 4.7*, Impacts on Resources*, describes the potential impacts, including impacts on invertebrates, such as amphipods. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Comment GP857-8

IMPERIUM EIS

In general comments are the same as above. In addition to the proposed transport and storage of Bakken oil, other products such as jet fuel are no less volatile.

This document states: "A large oil spill, fire, or explosion would likely cause unavoidable and significant adverse environmental impacts. The likelihood of a large spill or related fire or explosion is relatively low; however, the potential for significant consequences to the environment and human health if such an incident were to occur is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. No mitigation measures would completely eliminate the possibility of an incident, nor would they completely eliminate the adverse consequences of an incident." And "Spill prevention, preparedness, and response requirements are intended to reduce the likelihood of a spill at the project site and the resulting environmental damage. Implementation of mitigation (Table S-1) would further reduce the risks associated with spills at the project site. Although the overall risks would be low, if a spill occurred, the potential environmental damage would be significant. These risks would remain even with implementation of mitigation". **(S-20 and S-21)**

As stated above: Your documents downplay the risk of spill or explosion There have been a number of oil train explosions and derailments in the last two years and even the US Military has expressed concern.

Response GP857-8

Comment is specific to the REG (formerly Imperium Terminal Services) Expansion Project and would be addressed in responses to comments as part of the Final EIS for that proposed project.

Comment GP857-9

You accurately state: "Additionally, Grays Harbor and the Chehalis River provide habitat for numerous sensitive and unique plant and animal species. The area also provides important commercial and recreational opportunities, including fishing and shellfish growing, and cultural, historical, and tribal resources. Potential impacts from oil spills, fires, or explosions are summarized by resource in Table S-3. **(S-25)**"

Response GP857-9

Comment acknowledged.

Comment GP857-10

Your document states: "Because allowable train speeds along the PS&P rail line and vessel speeds in the harbor are low, the likelihood of a fire or explosion during transport is reduced, although the potential for environmental harm if a fire occurred with or without an explosion could be quite severe (S-30)." Not all oil train accident or explosions are related to train speed. Also for similar comment on **4.5-10.**

Response GP857-10

Draft EIS Chapter 4, Section 4.5, *Environmental Health Risks—Rail Transport*, describes different scenarios under which a train can derail, including human error, equipment failure, and track issues.

Refer to the Master Response for Risk Assessment Methods for additional information about the approach, assumptions, and sources of data used in the risk assessment.

Comment GP857-11

Your document states: Voluntary measure: To reduce the risk of spills affecting high numbers of migratory birds during peak spring migration (typically 2 weeks), the applicant will coordinate with the City of Hoquiam to receive advance notice of the date for the annual Grays Harbor Shorebird Festival. The applicant will halt crude oil vessel loading operations for a period of 2 weeks each year overlapping with the event. **(S-40)." Any large spill beyond that narrow window would have significant impact on shorebirds through their food source at this site. Long term impacts at the refuge would occur.**

Thank you for the opportunity to comment through public hearing and EIS review.

Sincerely,

Bob Zeigler
1102 A Creekwood Ct. SE
Olympia, WA 98501
ZeiglerBob@msn.com
(360) 570-0848

[Attachment: Accident Findings Report.]

Response GP857-11

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification. Potential impacts on resources in the event of a spill, fire, or explosion are addressed in Chapter 4, Section 4.7 Impacts on Resources. Final

EIS Section 4.7 has been revised to indicate that the mechanisms for potential adverse impacts also include secondary impacts on shorebirds from loss of food sources. Chapter 4, *Environmental Health and Safety*, acknowledges (in multiple sections) that oils spills are not completely preventable even with the regulatory requirements and mitigation measures that would reduce the risk of an oil spill; Chapter 4 further states that that the potential impacts from an oil spill could be significant.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP858, **Zeigler, Bob**

Comment GP858-1

Thank you for the opportunity to comment. My name is Bob Zeigler, I live in Olympia, Washington.

And I'm here because of the potential impacts of the proposals of public resources. There is -- you have in this area natural resources of international significance; the shorebirds, the Bakken Basin, as well as your fishery resources and other resources.

There's -- I want to talk a little bit about the secondary effects of these proposals, and those are, there's potential impacts. The climate change was of great concern from those comments made earlier. Also, impacts that can occur anywhere for where these trains are loaded with oil all the way to Hoquiam. And I hope that can be explored, because I wonder what the potential risks are for the state and for the city if they permit the facility that is the reason the train is on the tracks that has a spill or accident, would pays? The railroads don't pay. They're legally exempt. But what liability falls to the City and to the State? Thank you.

Response GP858-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP859, **Zeigler, Bob**

Comment GP859-1

1102 A Creekwood Ct. SE Olympia, WA 98501 (360) 570-0848 ZeiglerBob@msn.com

RECEIVED OCT 1 2015

October 1, 2015

RE: Elma Public Hearing: Westway and lmperium crude oil-by-rail terminal EIS

Dear Responsible Officials:

I know you cannot make any permit decisions until all information is in and Impact Statements are final but I do hope you will explore all potential impacts especially secondary impacts of these proposed actions.

SEPA Rules state:

(d) A proposal's effects include direct and indirect impacts caused by a proposal. Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as a precedent for future actions. For example, adoption of a zoning ordinance will encourage or tend to cause particular types of projects or extension of sewer lines would tend to encourage development in previously unsewered areas. (WAC 197-11-060, Content of environmental review (4) Impacts).

The indirect or secondary potential impacts including increased risk of spill, accident and potential loss of life and public resources (water quality to fish and wildlife) to tribal resources occur from the point where trains are loaded with oil to the point of your permitted facilities. The fact that the previously developed site is enhanced for oil storage and transport sets in motion the movement of oil by rail from point of loading to the sites being proposed.

In addition to increased spill or accident the impact of facilitating increased emission of C02 from consumption of these resources has cumulative impacts on the climate of our planet. Scientists tell us that to reduce risk of most severe climate consequences we need to leave 80% of the planet's fossil fuels in the ground. Pope Francis in his recent encyclical, Laudato Si, calls on all on the planet to drastically reduce carbon emissions and convert from the use of fossil fuels. This has become a major moral issue as well as one of science.

I also urge you to check with your legal staffs to assess, in light of railroads incurring no legal risks, what potential legal risks do the City and the state of Washington incur if one or both of these facilities are permitted and a train has a serious accident for example in Hoquium or even in City of Spokane or Tri Cities? While the railroad does not, both the City and the State have the responsibility for public health, safety and welfare and SEPA responsibility for a safe and healthy environment. Should an accident occur as happened in Quebec where 47 lives were lost, who pays especially when so many concerns have been raised in the environmental review and permitting process?

I will provide additional comments on your draft EIS after my final review. Thank you very much,

Bob Zeigler

Response GP859-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP860, **Zeller, Nick**

Comment GP860-1

Transporting highly volatile oil by rail through the communities of the columbia gorge is dangerous, and risky. I was a TV news photographer 28 years for KGW-TV and been to many derailments in the gorge and have seen the damage they have caused to the river and environment. An oil train disaster could wipe out much of my town as the rails run right through the community. Oil for export

shouldn't traverse the unique Columbia Gorge, there is just too much at stake, from human lives to salmon and sturgeon. These proposals should not be approved. We all must stop adding carbon to the environment, allowing oil trains to despoil the gorge for profit must not be allowed.

Response GP860-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Based on the Crude Oil Market Analysis, presented as Final EIS Appendix Q, despite the lifting of the Energy Policy and Conservation Act of 1975 banning the export of crude oil from the United States, West Coast refineries remain the most likely destination for crude oil transloaded under the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.

GP861, **Ziggy**

Comment GP861-1

My name is Ziggy, I'm from Spokane and Spokane County. I had to work last night so I had to drive all through the night, haven't slept since nine o'clock yesterday morning so I could be here, because you don't seem to include the fact that these things affect my city, too. Every one of these trains comes through Spokane.

And if of them has an accident and blows up, that's my friends that are going to die. And the only way I would support this thing is if the four of you want to take criminal responsibility for those people that might die because you approve this.

I'm totally against this, I will be at every hearing you have, and I will never stop opposing this and I will do anything I can to stop it.

Response GP861-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP862, **Ziggy**

Comment GP862-1

Hello, my name is Ziggy. I live in Spokane. I'm here today to speak on behalf of my numerous friends in the Spokane area and in Idaho. I've been involved in the coal transportation, Spokane area from the very beginning.

It involves citizens and residents on the eastern side of the state only because of these issues possibly expanding the oil through Hoquiam to Grays Harbor.

All of those trains to Grays Harbor come through the Spokane area. We don't have a facility or a refinery. Even if an explosion doesn't happen, there would be no benefit to our town. Those of us fellow Washingtonians that don't live in Grays Harbor want you to know we do not benefit from these facilities, nothing. Instead we risk spills in our river, devastating fires, threat of our economic vitality, life and health of our citizens and our environment.

We are making decisions for thousands of people along the rail lines. It's not just about Grays Harbor. It's the whole Northwest. We all live together as a team in this world. Using baseball as an analogy, you get three strikes before being out. With these proposals, all the hundreds of towns on the rail line, including where I live, get one strike and we are done, end of play, end of game, perhaps the end of our towns.

It is clear from the DEIS there is no way to mitigate the risk and danger from these crude oil terminals. Department of Ecology and the City of Hoquiam must deny these permits.

Response GP862-1

Refer to Response to Comment GP862-1.

GP863, **Zimmer, Doug**

Comment GP863-1

Hi. My name is Doug Zimmer. I have lived in Aberdeen, Grays Harbor County, since 1986. I am retired from the U.S. Fish and Wildlife Service and the Washington Department of Wildlife. I have worked on over a dozen oil spills during my career, beginning with the Nestucca in 1988 and finishing with the Deepwater Horizon. I know something about spills. I also know something about DEISs, and I am not impressed with this one.

When I reviewed the wildlife section I was disappointed. The section on terrestrial wildlife lists species that do not exist here and ignores others that do. The section on marine mammals failed to cite easily available current professional sources and appears to have been sourced from Wikipedia or a 30-year-old nature guide.

Response GP863-1

The Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species database was used as one of the primary data sources for describing animals in the study area because it provides comprehensive information on important fish, wildlife, and habitat resources in Washington and is the principal means by which WDFW provides wildlife and habitat information to

public and private entities for planning purposes. The U.S. Fish and Wildlife Service and National Marine Fisheries Service lists of federally listed species were also reviewed.

Comment GP863-2

It restricts the area of investigation to a three-mile arc around the harbor mouth, but anyone who remembers the Nestucca spill, which happened in the mouth of the harbor, knows that it oiled beaches and killed animals from Oregon to Neah Bay.

Response GP863-2

Refer to the Master Response for Oil Spill Modeling for information about the approach, assumptions, and limitations of the oil spill modeling in Draft EIS Appendix N, *Oil Spill Modeling*.

Comment GP863-3

The DEIS calls the effects of contaminant release short-term and temporary. Grays Harbor is a soft-sided estuary fed by tidally-influenced rivers that back-flush for miles. Oil released in such an area is impossible to remove and persistent over decades or centuries. These may be short term in geologic time, they are not in human or wildlife terms. The effects of spilled oil are not temporary, they are chronic and persistent.

Response GP863-3

Final EIS Chapter 4, Section 4.7, *Impacts on Resources*, describes the general types of impacts on resources that would be expected as a result of an oil spill; the section has been revised to acknowledge the potential for more lasting impacts as the result of a spill.

Comment GP863-4

The DEIS says that there will likely be no unavoidable or significant adverse impacts to wildlife. The effects of a major oil spill are always unavoidable and always significant. There is currently no entity in Washington capable of effectively handling the catastrophic release from a train derailment, tank failure, or vessel accident. And I say that from experience and knowing the programs.

Response GP863-4

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 to reduce the likelihood of a spill reaching the environment and the potential impacts if an incident occurs at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including wildlife. Refer to the Master Response for Mitigation Framework for more information about the development, implementation, and enforcement of mitigation measures.

Comment GP863-5

Putting facilities like these on fill, in an earthquake and tsunami zone, subject to the effects of storm, wind, and wave, is irresponsible. It will inevitably result in a catastrophic release. It's not if, it's when. And not one of the responsible parties is prepared to handle that.

That's fine. Here's my written statement. thank you.

Response GP863-5

Draft EIS Chapter 3, Section 3.1.4.3, *Geological Hazards*, describes geologic conditions that could affect the project site, including earthquake and earthquake-related hazards such as tsunami and liquefaction. Section 3.1.5.2, *Proposed Action*, *Operations, Earthquakes and Related Hazards*, describes the potential impacts on the proposed facilities in the event of an earthquake. Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to these events.

GP864, **Zimmer, Doug**

Comment GP864-1

Comments on the proposed lmperium Expansion Project in Grays Harbor

Section 3.5 Animals

Doug ZimmerRECEIVED OCT 1 2015 2017 West 6th Street Aberdeen, WA 98520 October 1, 2015

3.5 -1 oct 1 2015

Study area: The study area does not cover the area nor the animals that would be affected by an accidental release of oil or other toxics from the Westway site. It currently covers only a small footprint, yet the materials stored on site or transported to it have the potential for a catastrophic release. The study area should include all the marine waters of Washington and Oregon and all the tidally-influenced waters of the Grays Harbor estuary. During the 1988 Nestucca spill cleanup oil from the accident, which occurred in the mouth of Grays Harbor was found more than 50 miles at sea and on beaches from Oregon to Neah Bay. That was only a partial release (231,000 gallons) from a barge. This project proposes annual passage of hundreds of vessels many times larger. The current study area is woefully inadequate to the risk. Although State jurisdiction extends only three miles from the shore, there are hundreds of miles of shoreline at risk. Consideration must also be given to the State's potential liability in the event of a release within the State's jurisdiction which then extends into Oregon or Federal waters and affects Oregon or Federally-protected species.

Response GP864-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Final EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms and has been updated to provide additional information about economic and social costs of oil spills.

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapters 5 and 6, *Cumulative Impacts*, reflect additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action.

Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7 would also apply to the extended study area.

For more information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Comment GP864-2

3.5 -4 This section lists mule deer as local residents. The local resident deer are Columbian black-tailed deer. Although they are a sub-species of mule deer, they use significantly different habitat and citing them as mule deer is both a taxonomic error and would lead to habitat misidentification. The nearest mule deer are east of the Cascades Mountains, over 100 miles away. This is an indicator of incomplete species presence identification.

Response GP864-2

Final EIS Chapter 3, Section 3.5, *Animals*, removes the mule deer reference. The reference to Columbia black-tailed deer has been retained.

Comment GP864-3

3.5 -6 Correspondingly, there is no mention of elk as present in the study area. Roosevelt elk are common around the harbor perimeter. On 9/29/15 I watched 17 head of Roosevelt elk grazing in the Bishop Recreational Center in direct line of sight from the Westway and lmperium project sites. Their habitat would be effected by any large toxic release. This is an indicator of incomplete species presence identification.

Response GP864-3

Elk are mentioned in Section, 3.5.4.3, *Grays Harbor*, *Washington State Department of Natural Resources Marine Protected Areas,* as being present in the study area, specifically around the North Bay Natural Area Preserve and the Elk River Natural Resources Conservation Area.

Comment GP864-4

3.5 -10 There is no mention of summer-run steelhead in the Wynoochee River. Summer-runs are present and would be affected by a rail-based spill. I have seen them caught by sportsmen almost directly below the current rail bridge. This is an indicator of incomplete species presence identification.

Response GP864-4

Draft EIS Chapter 3, Section 3.5.4.2, *PS&P Rail Line*, *Aquatic Habitats*, recognizes the 26 salmon-bearing streams, including the Wynoochee River, that are crossed by the PS&P rail line in the study area. In addition, Appendix F, *Special-Status Species*, lists all special-status species in the study area, including steelhead trout, that could be affected by the proposed action.

Comment GP864-5

3.5 -14 The section cites a harvest of 9,247 pounds of Dungeness crab in 2013-14 then notes that the average harvest is 91,372 pounds. This was either the worst crab harvest in living memory, a significant error in reporting, or a typo missed by the editors. In any case it speaks to the credibility of the overall document - or lack thereof.

Response GP864-5

The Dungeness crab harvest for 2013–14 and average annual harvest between 1997 and 2014 identified in Draft EIS Chapter 3, Section, 3.5.4.3, *Grays Harbor*, *Aquatic Habitat, Invertabrates,* accurately reflect the Washington Department of Fish and Wildlife data cited.

Comment GP864-6

3.5 -15 The depiction of the potential presence of sea turtles as highly unlikely is inaccurate. Sea turtles, all species listed under the Federal Endangered Species Act, regularly strand at Ocean Shores, Westport and other area beaches. I have personally participated in several stranding recoveries of both live and dead green and loggerhead sea turtles from area beaches. Although not common, sea turtles occur in the area frequently enough to warrant consideration regarding both vessel strikes and contaminants release. Particularly if the study area is expanded.

Response GP864-6

Final EIS Section 3.5, *Animals*, reflects additional information to justify the statement that sea turtles in the study area would be rare. Potential oil spill impacts on sea turtles are discussed in Final EIS Chapter 4, Section 4.7, *Impacts on Resources*. Because sea turtles are rare in the study area, potential strikes on sea turtles from vessels associated with the proposed action would be unlikely.

Comment GP864-7

3.5-21 The DEIS characterizes the effects of contaminants reaching a surface water body as short-term and temporary. The bottom and sides of the Grays Harbor estuary are soft soils - essentially mud - and the tidally-influenced rivers that feed the Harbor backflush for tens of miles in each tide cycle. The effects of toxic release in such areas are not short-term, nor are they temporary: rather they are chronic and persistent. Please review the effects of similar releases into coastal estuaries during the Deepwater Horizon event for examples. Any toxics spilled into Grays Harbor water bodies are likely to be detectable and toxic for decades.

Response GP864-7

Draft EIS Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses the impacts associated with routine operations, including the potential for minor spills and leaks. As noted in Section 3.3, *Water*, the potential for impacts associated with incidental spills would most likely be minimized by containment features and best management practices. The potential for widespread environmental damage related to the risk of oil spills, fires, and explosions is addressed in Chapter 4, *Environmental Health and Safety*. As noted in Chapter 4, spill scenarios include the release of up to a specified volume of oil, meaning that smaller spill volumes are included in the assessment of risks. Mitigation measures to address potential impacts from the increased risk of oil spills, fires, or explosions are presented in Chapter 4 and, as noted, would help to reduce potential impacts on the environmental resources in the study area. However, as noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP864-8

3.5 - 28 The section on vessel strikes greatly underestimates the potential for, and effect of, vessel strikes on marine mammals, specifically whales, both within Grays Harbor and in areas immediately surrounding and just outside the harbor mouth.

Oleson, E.M., J. Calambokidis, E. Falcone, G. Schorr, and J .A. Hildebrand. 2009 Acoustic and visual monitoring of cetaceans along the outer Washington Coast. Technical Report for grant N0002407WX12527. Report # NPS-OC-09-001 issued by Naval Postgraduate School, Monterey, California. 45 pp. cites sightings of both humpback and gray whales within Grays Harbor and immediately adjacent to the mouth of the Harbor. Sightings of harbor porpoise in the area are almost too numerous to plot. The sightings plotted on their maps are within the shipping lanes that would be used by the additional hundreds of vessels entering and exiting the harbor to utilize the lmperium and Westway facilities. This will greatly increase the probability of vessel strikes. Vessel strikes are known to cause significant levels of mortalities in both whales and porpoises yet the only mention of strike effects in the DEIS are four strikes in which the animals survived. That is akin to citing NFL sacks in which the quarterback did not get knocked down. It happens but not very often and the damage inflicted is often still significant. “Somewhat greater” is not an accurate description of the chances of vessels strikes imposed by the addition of hundreds of vessel trip per year through an area frequented by dozens, perhaps hundreds, of whales and other marine mammals.

As regards the project area, I have personally seen whales in the Chehalis River as far upstream as Cosmopolis. This means those animals swam right past both the lmperium and Westway project sites. These sightings, while infrequent, are not unknown and could happen again any time. Several have been reported in the Aberdeen Daily World. Checking with area sport and tribal commercial fishermen will confirm my report. I have heard several members of each group refer to "whales in the river."

Response GP864-8

Final EIS Chapter 3, Section 3.5.4.3, *Grays Harbor,* clarifies whale and other marine mammal use of Grays Harbor and provides additional information on gray whales, humpback whales, and killer whales. Draft EIS Section 3.5.5.2, *Proposed Action*, addresses potential vessel collisions with marine mammals. Final EIS Section 3.5.5.2 clarifies that marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a higher risk from vessel strikes. However, the potential for vessel strikes in the study area would be only slightly greater compared with the no-action alternative.

Comment GP864-9

3.5 - 31The proponents propose to mitigate the effect of possible oil spills on shorebirds utilizing Bowerman Basin by halting crude-oil vessel loading for two weeks surrounding the annual shorebird festival. This is clearly palliative rather than protective - the migration period lasts several months and the shorebird festival is based not on peak bird use but on tides that make for convenient viewing. I don't know whether this proposal is as cynical as it seems or merely ignorant of the real situation but it is not a realistic mitigation factor: any spill that happens in the other 50 weeks will ensure that birds visiting Bowerman during those two "off" weeks do not have a healthy stay.

Response GP864-9

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, *Recreation*, to reflect this clarification.

Comment GP864-10

3.5-31 .8 The statement of "no unavoidable and significant adverse effects" is nonsensical given the likelihood of vessel strike imposed by the great increase in vessel trip through a harbor and estuary crowded with multiple species of marine mammals. Even if you discount the harm and take caused by the periodic release of toxic petroleum products the finding is simply not accurate. There is no way it could pas a serious "red face" test among knowledgeable oil spill professionals. It shouldn't be in this DEIS.

Response GP864-10

Final EIS Chapter 3, Section 3.5, *Animals*, reflects additional information to address marine mammal use of Grays Harbor. The vessel impact mechanisms described in Section 3.5 remain the same, but the Final EIS section clarifies that marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a greater risk from vessel strikes. As described in Section 3.5, the likelihood of vessel strikes and the potential for population-level impacts be low; therefore, potential impacts are not considered significant.

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on marine mammals.

Comment GP864-11

4.7.1.3 Animals

4.7 -5 Animals that need to be listed and considered in this section but are not include common murres, the most numerous bird species oiled by the 1988 Nestucca oil spill at the mouth of Grays Harbor, and sea otters, which have been colonizing southward from Cape Elizabeth as far as northern Oregon. There are several sighting reports within Grays Harbor, mostly in the north bay (pers Comm Deanna Lynch, USFWS, 9/29/15). I have had anecdotal reports of sea otters as far up the Chehalis as the turning basin adjacent to Bayview Redi-mix but these are undocumented. Still, given the rapid expansion and southward spread of Washington's sea otters and their extreme vulnerability to oil spills, consideration should be given to their presence.

Response GP864-11

Draft EIS Chapter 3, Section 3.5, *Animals,* focuses on rare, threatened, or endangered species (listed in Draft EIS Appendix F, *Special-Status Species*) and conservatively assumes that these species are or could be present in the study area at any given time. Section 3.5 refers to other species in general terms. The risk of impacts on special-status species would be greater than all other species because of their sensitivity, but impact types and mechanisms would be the same for other species.

The sea otter is listed as one of the special-status species in Appendix F, *Special-Status Species*, which supports Section 3.5. Based on Washington Department of Fish and Wildlife's sea otter recovery plan, sea otters are rare near Grays Harbor. While they were historically found in waters off of Grays Harbor, their current distribution is concentrated almost exclusively on rocky habitat along the Olympic Peninsula Coast and western Strait of Juan de Fuca. However, the impact mechanisms considered in the analysis of impacts from construction and routine operation (Section 3.5) and from oil spills, fires, or explosions (Chapter 4, Section 4.7, *Impacts on Resources*) are relevant to all species.

Comment GP864-12

6.1 Cumulative impacts

6-1, 6.2 The cumulative impacts section does not address the cumulative impacts of potential vessel strikes on marine mammals despite the addition of an estimated 400 vessel trips per year for the proposed lmperium expansion and 238 additional vessel trips for the proposed Westway Expansion Project. This is an increase of two and a half times as many vessel trips through an area heavily utilized by multiple species of marine mammals, several of them ESA-listed species. Impacts to these protected species could result in additional restrictions being imposed on already-present marine-related industries. This needs to be considered in the cumulative effects analysis.

Response GP864-12

In general, the scope of the cumulative impacts analysis is limited to those resources on which the proposed action could have significant impacts in combination with other past, present, and reasonably foreseeable and similar future actions, based on the analyses in Chapter 3, *Affected Environment, Impacts, and Mitigation*, and Chapter 4, *Environmental Health and Safety*. As described in Draft EIS Chapter 3, Section 3.1.5.2, *Proposed Action*, proposed action vessel trips would result in a small, incremental increase in the potential for impacts associated with wake compared with the no-action alternative. Therefore, the potential for increased vessel strikes is not included in the cumulative analysis.

GP865, **Zimmerman, Robert**

Comment GP865-1

I am strongly opposed to the development of facilities that would allow for an increase in the transportation of bulk oil through the Columbia Gorge. The risk of accident is too high. Please consider the impact of these projects on both the people and the environment of this special place -- and not just the financial gain to be obtained by the businesses involved.

Response GP865-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP866, **Zora, Craig**

Comment GP866-1

November 23, 2015

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

SUBJECT: **Westway and Imperium Crude Oil-by-Rail Terminal EIS**

The draft environmental reviews found that the risks of oil spills during rail transport, at the terminal site, and during marine vessel transport through Grays Harbor cannot be **fully mitigated**, and that if a spill occurred, the environmental damage would be **significant**.

Twenty-five years after the infamous Exxon Valdez oil spill in Prince William Sound, beaches on the Alaska Peninsula hundreds of kilometers from the incident still harbor small hidden pockets of surprisingly unchanged oil, according to new research (American Geophysical Union 2014).

Incidental Leaks and Spills There will be small spills throughout the oil transportation process. Pacific herring (*Clupea pallasii*) spawn in eelgrass in Grays Harbor. Federal scientists based in Seattle and Alaska have found that oil — by impairing heart functions — can cause serious harm to herring and salmon at far lower concentrations than previously documented (Incardona et al. 2015). How will impacts from chronic exposure to small oil spills be identified and monitored? Who will fund the comprehensive baseline sampling, testing, and monitoring? Discuss in the Final Environmental Impact Statement (FEIS) how an environmental baseline will be established and changes will be detected. How will these impacts be mitigated and will an GIS-based tool be created for the public to easily view all environmental assessments?

Response GP866-1

Chronic exposure to oil (regardless of spill size) is addressed in Draft EIS Section 4.7, *Impacts on Resources,* and summarized in Draft EIS Table 4.7-1, *Chemical Properties and Mechanisms of Impact on Plants and Animals*. Any oil spilled in the aquatic environment during its transport would need to be cleaned up per federal and state regulations regardless of spill size. As stated in Section 4.7, the extent of the damage would depend on various factors (e.g. location of spill, environment affected, weather, material spill). Any testing, monitoring, or mitigation of the spill's impact on the environment would be determined at the time of the spill and cleanup in consultation with federal and state agencies. Any environmental assessments of the spill and cleanup efforts and public availability of those assessments (in whatever form they may be in) would be determined by the resource agency at the time of the spill event and cleanup. Refer to the Master Response for Environmental Health and Safety Analysis for additional information.

Comment GP866-2

Listed salmon species Poor coho (*Oncorhynchus kisutch*) survival continues to have a devastating effect on the stocks and our fisheries. Coho restrictions have already been in effect in Puget Sound, Grays Harbor, Willapa Bay, and the Columbia Basin. This action was necessary to protect wild coho that appear to be arriving at approximately half the number needed to meet 2015 escapement goals.

When the Coho salmon is eventually listed what extra precautions will Westway, Imperium, the railroad, and the shippers take to minimize impacts to a listed species. As environmental conditions in the ocean change (Fig. 1 and 2) other salmon species will be affected. How will impacts be minimized as the earth's climate changes (see indicator list below)? Has any modeling been done? All these concerns need to be examined in the FEIS.

Fig. 1 NOAA Fisheries

http://www.nwfsc.noaa.gov/research/divisions/fe/estuarine/oeip/g-forecast.cfm?utm_source=January+2014+Newsletter&utm_campaign=Jan+2014+Newsletter&utm_medium=email

[See original attachment for Fig. 1, Coho and Chinook 2015 outlook based on large-scale ocean and atmospheric indicators, local and regional physical indicators, and local biological indicators]

Western Washington's "maritime" summer climate becomes today's interior Columbian Basin. The interior Columbian Basin becomes today's Central Valley.

[See original attachment for Fig. 2, Salmon and Ecosystems: August Mean Surface Air Temperature and Maximum Stream Temperature]

Response GP866-2

Refer to Final EIS Chapter 3, Section 3.2.7.1, *Applicant Mitigation*, for proposed mitigation measures for air quality and greenhouse gas impacts. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for additional information about the analysis of greenhouse gas emissions. For more information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework.

Comment GP866-3

3.5-27 Vessel Strikes *Collisions with ships are one of the primary threats to marine mammals, particularly large whales, along the U.S. west coast, and around the world. Related to the proposed action, the greatest potential for vessel strikes to occur would be in the shipping lanes, which are located outside of state waters (farther than 3 nautical miles from the coast). This is because large mammals, like whales, typically migrate and forage in deeper waters and are not likely to enter the harbor.*

How often do Gray whales enter the harbor to forage on ghost shrimp (*Neotrypaea californiensis*)? There are early accounts (1903) of Gray whales making their way to the Wishkah River. I recommend marine mammal observers (using passive acoustic monitoring at night) be deployed on all vessels during migration windows to minimize the risk of marine mammal collisions (Weinrich et al. 2009). In the FEIS discuss in detail how collisions with all marine mammals will be avoided.

Response GP866-3

Final EIS Chapter 3, Section 3.5.4.3, *Grays Harbor,* clarifies whale use of Grays Harbor and provides additional information on gray whales, humpback whales, and killer whales. Draft EIS Section 3.5.5.2, *Proposed Action*, addresses potential vessel collisions with marine mammals. Final EIS Section 3.5.5.2 clarifies that marine mammals that are more common in Grays Harbor and nearshore coastal waters would be at a higher risk from vessel strikes. However, the potential for vessel strikes in the study area would be only slightly greater compared with the no-action alternative. Refer to the Master Response for Mitigation Framework.

Comment GP866-4

3.5-30 Voluntary Measures and Design Features *The following voluntary measures and design features would reduce impacts on animals. To reduce the risk of spills affecting migratory birds during peak spring migration (typically 2 weeks), the applicant will coordinate with the City of Hoquiam to receive advance notice of the date for the annual Grays Harbor Shorebird Festival and will halt crude oil vessel-loading operations for a period of two weeks each year overlapping with the event.*

Is two weeks sufficient? Why not coordinate with USFWS, WDFW, and Audubon? Shorebird migration in Grays Harbor County begins around April 15 and continues for about 3-4 weeks. A month at the minimum would be required not two weeks. There needs to be input from scientists not just City of Hoquiam administrative staff. Again discuss in FEIS how this process should work.

Response GP866-4

Although ceasing vessel-loading operations for 2 weeks during the Grays Harbor Shorebird Festival would reduce risks related to oil spills that could affect migratory birds during this migratory season as well as other species in the area, the Final EIS clarifies that the applicant's primary intent in committing to this voluntary measure is to recognize the importance of the annual Grays Harbor Shorebird Festival to the community and those attending the festival and to eliminate the chance of a spill from vessel-loading operations during this time. The measure has been moved to Final EIS Chapter 3, Section 3.10, Recreation, to reflect this clarification.

Draft EIS Chapter 4, *Environmental Health and Safety,* presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and proposes additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant.

Comment GP866-5

Appendix N GNOME modeling. The GNOME model requires selecting the specific type of oil for the modeled trajectories from a predetermined list of pollutants. Bakken crude oil and diluted bitumen, which are the two most likely types of oil under the proposed action, are not included in this list. Therefore, the GNOME model cannot fully reflect how these types of oils would behave or persist in the environment when spilled.

- Add Bakken crude oil and diluted bitumen to the list of pollutants. This tendency may result in a mixing of the oil droplets or fragments with sediment in the water column and a resultant suspension of oil beneath the water's surface. As discussed in Attachment B, at the Marshall spill into Talmadge Creek and the Kalamazoo River, under certain conditions, diluted bitumen was observed as suspended in the water column or even sank. How much oil will sink?

- The Grays Harbor Location Files used in the GNOME trajectory analysis were developed to address hydrodynamic conditions within the harbor and are not meant to model accurately the movement of oil outside of Grays Harbor (N-3). Would an oil spill reach Willapa Bay in a 48 or 96 hour period? Can this scenario be modeled? How would Willapa Bay be impacted? Why not model for 96 hours and greater? Discuss in FEIS.

- Add Rennie Island to an updated Grays Harbor GNOME model. Include this revised model in the FEIS.

- Were other oil spill models considered? What other models are available besides GNOME? Are there 3D models available that are more predictive that the GNOME model (Chao et al. 2001)? Discuss in FEIS.

- ICF is using a 1-dimensional hydraulic model (HEC-RAS) to model a spill in the Chehalis River. Is a one-dimensional model adequate? Were other spill models considered? Discuss in FEIS.

- Model the Nestucca oil spill that occurred off Grays Harbor on December 23, 1988 in the FEIS. The environmental parameters are known so the GNOME model could be evaluated. At public meetings held in Grays Harbor and Thurston County this request is brought up often.

- Can the Envsion model (http://envision.bioe.orst.edu/Default.aspx) be used in conjunction with the GNOME model to evaluate habitat impacts under different oil spill scenarios.

Response GP866-5

Draft EIS Appendix N, *Oil Spill Modeling*, presents data from ADIOS at the 48-hour mark to easily compare with the GNOME mass balance estimates at that same period. This comparison provides a better representation of the behavior of Bakken crude oil or diluted bitumen (dilbit), which can be modeled using ADIOS but not GNOME, in the environment.

Refer to the Master Response for Oil Spill Modeling Methods, which addresses the applicability and selection of the three models used as part of the oil spill modeling effort: GNOME, ADIOS, and Hydrologic Engineering Centers River Analysis System (HEC-RAS). It was determined that these models provided sufficient analytical capabilities for the purposes of evaluating spill scenarios for the Draft EIS. GNOME, specifically, was selected to complete the oil spill trajectory analyses because it is a commonly accepted industry standard for contingency planning, scenario analysis, and oil spill response used by the National Oceanic and Atmospheric Administration, the U.S. Coast Guard, and the Washington State Department of Ecology.

Comment GP866-6

3.5 What is the study area for animals? *The study area for animals consists of animals and habitats (terrestrial and aquatic) on and near the project site that could be affected by construction and routine operations at the project site. The study area also includes animals that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P) 2 rail line and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor*.

Why are impacts limited to three nautical miles? Are acoustic impacts to marine mammals limited to three miles (*Weilgart 2007*)? In the FEIS explain why the study area should not be beyond three miles.

Response GP866-6

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from vessel transport—less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS.

Comment GP866-7

3.5 Oyster beds *are located primarily in the south and central portions of Grays Harbor (Washington Department of Fish and Wildlife 2014a). Oysters feed on small organisms that they filter from the water column. Spawning occurs annually in July or August when water temperatures rise above 19.5°C*.

There are State, County, and private oyster grounds in North Bay also. The oyster tracts are shown on the Washington Marine Spatial Planning tool. Include North Bay oyster ground in the FEIS: https://fortress.wa.gov/dnr/mspmaps/index.html.

Is an environmental baseline survey required so when a spill does occur damages can be accurately assessed? Who pays for collection, storage, and processing of oyster tissue samples (Auffret et al. 2004)? Please discuss in the FEIS.

Response GP866-7

Final EIS Chapter 3, Section 3.5, *Animals*, has been revised to indicate that oyster beds are also found in areas of the North Bay.

Draft EIS Chapter 4, *Environmental Health and Safety*, Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP866-8

3.4.4.3 *These environmental parameters (i.e., current speed, water depth, salinity, and low turbidity) are not found in the navigation channel, along the shoreline, or in the immediate vicinity of the project site. The shoreline of the inner harbor and the shoreline adjacent to the project site do not support eelgrass (ICF Jones & Stokes 2009:4-1–4-4)*.

How will increased shipping traffic impact eelgrass in Grays Harbor? How will impacts be monitored and mitigated? Please discuss in the FEIS.

Response GP866-8

As stated in Draft EIS Chapter 3, Section 3.17, *Vessel Traffic*, vessels related to the proposed action would be limited to the navigation channel, which is maintained to a depth significantly deeper than the depth at which eelgrass can grow. As described in Section 3.4.4.3, *Grays Harbor*, *Aquatic Vegetation*, *Eelgrass*, the environmental parameters for eelgrass are not found in the navigation channel, along the shoreline, or close to the project site. Therefore, ships would not displace, uproot, or damage eelgrass during passage.

Increased intensity of wash or wakes could affect eelgrass by uprooting eelgrass in shallow areas along the outer boundary of the navigation channel (Section 3.4.5.2, *Proposed Action*, *Operations*, *Vessel*, *Vessel* Wakes). A 2003 wave modeling study conducted by Pacific International Engineering[3] (for the Port of Grays Harbor and coastal communities of southwest Washington) to address Washington Department of Natural Resources concerns about potential wave impacts on state-owned aquatic lands caused by the navigation channel in Grays Harbor concluded that, "energy from wind-generated waves generated in Grays Harbor and vessel-generated waves are shown to be insignificant in relation to the contribution from oceanic waves." The study focused on the Washington Department of Natural Resources Natural Preserve Whitcomb Flat, which is a sandflat

[3] Pacific International Engineering. 2003. Dynamics of Whitcomb Flats. Grays Harbor. July 10. Prepared for Port of Grays Harbor in Coordination with the Coastal Communities of Southwest Washington.

that is mostly submerged during high tide and exposed during low tides; it is directly adjacent to the navigation channel and is the nearest unprotected erodible feature to the navigation channel. The study concluded that waves from vessels (a variety of large commercial vessels traveling at 15 knots were modeled) made an insignificant contribution to all waves and that natural waves (storm waves and swell from ocean) were the driving force that affected the movement and erosion of the sandflat. Therefore, any impact caused by vessel wake would be insignificant in comparison to the existing baseline conditions (natural wave incidence).

Comment GP866-9

3.4.5.2 *Although small spills or leaks could occur as the result of human error or minor equipment failure, the potential for these incidents to occur would be reduced by appropriate training and the implementation of prevention and control measures as described in the spill prevention, control, and countermeasures plan and oil spill prevention plan.*

How will be the impact of these small spills or leaks be identified and assessed? How will their impact to the Grays Harbor ecosystem be monitored? Will a comprehensive study be funded to collect baseline data if the facilities are permitted? Discuss this in the FEIS.

Response GP866-9

As noted in Draft EIS Chapter 4, Section 4.2, *Applicable Regulations*, there is a framework in place to prevent, prepare for, and respond to oil spills. In Washington State, any oil spill, meaning of any size, must be reported by the responsible party. Appropriate regulatory action is taken based on the specific circumstances.

Comment GP866-10

Use the Washington Marine Spatial Planning tool
(https://fortress.wa.gov/dnr/mspmaps/index.html)

to analyze impacts from increased shipping traffic to the environment and other uses. A flow of key information links marine spatial planning (MSP) and oil spill risk analysis (OSRA), two distinct processes needed to achieve true sustainable management of coastal and marine areas. Discuss in the FEIS.

Response GP866-10

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms.

Comment GP866-11

Monitoring is the ongoing evaluation of the impacts of a development proposal on the biological, hydrologic and geologic conditions of shorelines and critical areas. Monitoring includes the gathering of baseline data and the assessment of the performance of required mitigation measures through the collection and analysis of data for the purposes of understanding and documenting changes in natural ecosystems and features. Discuss in the FEIS how monitoring will be implemented.

Response GP866-11

For information about the development, implementation, and enforcement of mitigation measures, refer to the Master Response for Mitigation Framework. Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP866-12

The paper, Treaty Rights at Risk, examines how the rights of western Washington treaty tribes to harvest treaty fish and shellfish, and the federal government's salmon and orca protection efforts, are at grave risk. Discuss further in FEIS how this project impacts these treaty rights of local tribes (3.12 Tribal Resources).

Link to paper:
http://nwifc.org/w/wp-content/uploads/downloads/2011/08/whitepaper628finalpdf.pdf

Response GP866-12

Draft EIS Chapter 3, Section 3.5, *Tribal Resources*, describes impacts on tribal resources that could occur in the study area as a result of construction and routine operation of the proposed action. Section 3.12.3.1, *Information Sources*, lists the sources of information used in the analysis. Chapter 4, Section 4.7, *Oil Spills, Fires, and Explosions*, describes potential impacts on resources, including tribal resources, in the event of an oil spill, fire, or explosion in the study area. Final Section 4.7 reflects additional information to address potential impacts on tribal resources.

Comment GP866-13

4.2.3.3 Oil Spill Response *Contractors* *The applicant must maintain an oil spill response contractor for oil spill response. These contractors provide spill response equipment and trained personnel. The Western Response Resource List outlines various types of response equipment maintained by participating private and public response organizations in the Pacific Northwest. Additional resources from across the United States are available as needed*.

Discuss in more detail the trained personnel available to respond to a spill. I have observed oil spill response training exercises on the water. Many contracted responders are employed locally or working on vessels overseas so are not available to be called up immediately. Have response times been modeled for different spill scenarios?

Response GP866-13

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Comment GP866-14

Ballast Water Concerns The International Maritime Organization's (IMO) convention is yet to be ratified. Once ratified, the convention will require an IMO-type approved ballast water treatment system (BWTS) to be installed on all new-build vessels and to be retrofitted on existing vessels. In the meantime, other bodies—most notably the U.S. Coast Guard (USCG)—have introduced their own federal regulations (Homeport, 2015) concerning ballast water. This links back to two legislative acts: the Nonindigenous Aquatic Nuisance Prevention and Control Act (1990) and the National Invasive Species Act (1996). Under U.S. federal rules, ships must have a USCG-type approved system installed by the ships' compliance date, starting as early as 2013, if they wish to travel in U.S. waters. Discuss in more detail how ballast water treatment systems will be inspected and monitored for compliance. Is the best available technology being utilized?

Response GP866-14

Potential ballast water impacts on the aquatic environment are addressed in Draft EIS Chapter 3, Section 3.4, *Plants*, and Section 3.5, *Animals*. Existing federal and state regulations address ballast water management. The Washington State ballast discharge regulations (RCW 77.120.040 and WAC 220-150) include reporting, monitoring, and sampling requirements of ballast water; all vessels must submit nonindigenous species ballast water monitoring data. Washington Department of Fish and Wildlife may also board and inspect vessels under WAC 220-150-033 without advance notice to provide technical assistance, assess compliance, and enforce the requirements of Washington State ballast water management program laws and regulations. Penalties and enforcement of not complying with the regulations are covered in WAC 220-150-080. To further minimize the risk of ballast water on vegetation communities and animals, proposed mitigation is included in Sections 3.4 and 3.5 for the applicant to develop and implement a monitoring plan in consultation with Washington Department of Fish and Wildlife prior to the start of proposed operations.

Comment GP866-15

The draft Environmental Impact Statements for both Imperium and Westway state repeatedly that **impacts cannot be mitigated**. All permits for these two projects must be denied. Instead let's focus on restoring water quality, restoring habitat, preparing for sea level rise and climate change impacts, and supporting natural resource-based industries throughout our estuary.

Sincerely,

Craig Zora
360-589-9854
czora@comcast.net

Response GP866-15

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP867, **Zora, Craig**

Comment GP867-1

Please comment on the attached report's findings as they pertain to this proposal. Report was just released on 11/30/2015.

[Attachments: The Behaviour and Environmental Impacts of Crude Oil Released into Aqueous Environments.]

Response GP867-1

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms, including impacts on animals. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP868, **RogerZora, Craig**

Comment GP868-1

Additional DEIS comment:

This excellent study was just released. Review it and discuss findings as they pertain to the Imperium-Westway projects. Craig Zora 360 589 9854

From: czora [mailto:czora@comcast.net l Sent: Monday, November 30, 2015 3:04 PM To: Butorac, Diane (ECY) <dbut461@ECY.WA.GOV > Subject: OIW Report.pdf

Sent from my Verizon Wireless 4G LTE smartphone[Attachment: The Behaviour and Environmental Impacts of Crude Oil Released into Aqueous Environments.

Response GP868-1

Refer to Response to Comment GP867-1.

GP869, **Zora, Craig**

Comment GP869-1

Comment on this recent report's finding as they pertain to the Westway-Imperium DEIS. Report is 12 MB so only sending link. http://www.sciencedaily.com/releases/2015/11/151125233112.htm Craig Zora 360 589 9854

Sent from my Verizon Wireless 4G LTE smartphone[Attachments: Shedding Light on Oil Behaviors Before the Next Spill, Science Daily. 2015.]

Response GP869-1

Refer to Response to Comment GP867-1.

GP870, **Anonymous**

Comment GP870-1

[Attachment: Dirty and Dangerous Crude Oil Terminals Proposed in Grays Harbor Factsheet]

Response GP870-1

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP871, **Anonymous**

Comment GP871-1

Where to begin?

I mean it starts with fracking and oil shale 7 sands then OIL BY Rail to Refineries. refinerie? under currant laws US cannot ship crude oil But a little light refining and "vowla" transportation oil.

I am not anti oil we need oil why export it we need it, So where will it be exported to under the PPTA Asian markets with little to no regulation on it use it could end up fueling Chinas ambitions and at the very least well get it back as acid Rain.

I beleive these terminals are the wagon before the horse these guys want to build these terminals ASAP before new regulation come about and to put in terms they can understand NEW Regulations for oil by Rail are in the pipline, but they want cheap and fast build NEW STRUCTURES that they will then "grandfather" and that is the Rush the urgency is all about these guys are really not much more than bullys and if we the people want them to play fair like all bully they'll take their slimeball and go home

[Attachment: Oil terminals, for your consideration]

Response GP871-1

Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources and for information on the likely destinations of crude oil shipped through the proposed facilities. All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP872, **Anonymous**

Comment GP872-1

[Attachment: Letter to Mr. Davis from Derek Kilmer, U.S. Representative, Congress]

Response GP872-1

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*. Comment acknowledged.

GP873, **Anonymous**

Comment GP873-1

"Steps to Christ" collage

[Collage reviewed but not reproduced.]

Response GP873-1

Comment acknowledged.

GP874, **Anonymous**

Comment GP874-1

Please see the attached PDF which states my observations and concerns around ecotourism in Ocean Shores, Washington, from the Imperium and Westway proposals.

I came in the fall of 2011 to Ocean Shores as a trailing spouse. My mother-in-law's declining health was more demanding, and we moved here for support of her. I had long wanted to retire in the verdant and healthful climate of the Pacific Northwest. Then the chance came to her son, my spouse. I am committed—if the area avoids further deterioration of its natural benefits—to living a productive engaged life here in Gray's Harbor. My resources will be spent here where I remember that the term "Pacific Northwest" means to most people "cleanliness," a place where wealth is measured many ways.

The proposals by Imperium and Westway are disappointing. A brief scan of the large documents shows several "show stopper" conclusions that cannot be supported.

The obvious inadequacy in the route of rail transport amazes me. Along the ineffably sensitive Columbia, Chehalis River, and at last the Hoquiam River these plans mandate passage of hypo-

insured oil tank cars. The condition and route of the oil route makes it unusable. The redundancy in the many descriptions of bridges, weak railbeds, and slumping hillsides threatening the track precludes needs for mention again here. The bridges and bed of the rail nearly require tipping, spillage, landslide overturns, or worse--ignition and probable explosion within the waterway itself. The Dakotan volatiles make this inadequately stabilized oil product yet more polluting and incendiary when shipped in moving vehicles. Velocity itself we review,is the largest factor in force (Force = Mass * Velocity^2), is idealistically one to avoid when transporting explosive masses.

Response GP874-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

Comment GP874-2

The core parameters of the GNOME modeling are inappropriately chosen. Many historically considered and vital geo- and biological parameters are missing from these EISs. These this do not account realistically for drift, deposition, decay or permanence in the bay. Thus, these EISs addresses environmental impact in language but not with historical, bioassayed, relevant data. These data bend heavily to those regarding appearance rather than ecosystem deterioration.

The scope of needed mediation is missing or inadequate, perhaps based on unavailable or underutilized data. My amateur scan of government data banks and reports (many machine readable) reveals many data available appropriate to the analysis of poisons and flows in Gray's Harbor. Several great failures in this model are clear.

Response GP874-2

Most parameters in the GNOME location files are based on historical averages and therefore use of the Location Files is considered appropriate for representing conditions in Grays Harbor for the purposes of the EIS. Refer to the Master Response for Oil Spill Modeling Methods for more information about the approach, assumptions, and limitations of the GNOME model.

Comment GP874-3

Only Gray's Harbor is modeled. This is inadequate given historical events and spills here. As **Appendix N-1** states we must assume that "the NOAA Grays Harbor Location Files used in the GNOME trajectory analysis were developed to address hydrodynamic conditions within the harbor and *are not meant to model accurately the movement of oil outside of Grays Harbor.*"

Response GP874-3

The Location File for Grays Harbor only extends approximately 10 miles north or south of the Grays Harbor entrance and does not include Rennie Island. Most of the environmental conditions associated with Rennie Island are included in the model. In order to predict how oil would travel along the coastline, Attachment A of Draft EIS Appendix N, *Oil Spill Modeling*, discusses two previous large spills off the Washington State coastline to illustrate the directions that oil can migrate offshore depending on seasonal conditions. Draft EIS Chapter 4, *Environmental Health and Safety*, indicates there is a potential for oil spills to move outside of Grays Harbor and up or down the coast depending on the specific conditions present at the time of the incident. Refer to the Master Response for Oil Spill Modeling Methods for information about the approach, assumptions, and limitations of the GNOME model.

Comment GP874-4

The channel rather than shellfish and other invertebrate habitats of interest to prey organisms such as migratory waterfowl is emphasized. Again N-1 states the NOAA Grays Harbor Location Files "are limited to the geographic extent of the Location Files when, during an actual spill, oil could continue to spread over time and travel beyond the immediate vicinity of the harbor depending on the existing current and wind conditions at the time of the spill." The files were developed earlier and used, though they fail to extend to concerned areas of the harbor.

Response GP874-4

Refer to Response to Comment GP874-3.

Comment GP874-5

Flows are not based on historically available data from the seven rivers into the harbor although the ADIOS attempt at approximation and amelioration is applied. One must question why accuracy has been sacrificed for research efficiency. Flows are chaotic and weather-dependent. Rivers are short and periodic, though viable in all season. Modeling these conditions demands greater care than that applied in each EIS.

Response GP874-5

Refer to the Master Response for Oil Spill Modeling Methods.

Comment GP874-6

Some issues suggest the impossibility of mediation, though appropriate longer-term analysis could very well dispel such objections. But one would be wise to believe that destruction of the basis for healthy diversity in reproducing populations is at risk because of these contaminants. Current data suggest the likelihood of irreversible permanent damage.

Response GP874-6

Comment acknowledged.

Comment GP874-7

These seeming irregularities suggest questions.

1. Ocean Shores depends upon reputation. If oil spills even once that reputation as "Destination for Nature" is destroyed. Home owners and visitors will not come to a polluted city. They wish filth's absence. How is it that such a destructive plan as either EIS proposes be consistent with ecotourism?

2. Why have impacts on home prices on the west and the east sides of Point Brown not been included when the prices are pollution-related?

3. Why have the above mentioned issues of water, shore, and air quality not been addressed with regard to ecotourism in Ocean Shores?

For these general reasons and many more detailed ones, I request the permits be denied.

Response GP874-7

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Draft EIS Chapter 7, Section 7.3.4.3, *Potential Impacts on Property Values*, acknowledges the potential for property values to be adversely affected due to the perception of increased risks and presents representative information about how this perception can adversely affect values. Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2 has been updated to provide additional information about economic and social costs of oil spills.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

Comment GP874-8

[Attachment: Ecotourism in Ocean Shores, Washington]

Response GP874-8

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Draft EIS Chapter 7, Section 7.3.4.2, *Potential Costs Related to Environmental Health and Safety Concerns,* describes the range of associated costs that could be expected in general terms. Final EIS Section 7.3.4.2, has been updated to provide additional

information about economic and social costs of oil spills, including impacts on on affected businesses.

Refer to the Master Response for Economics, Social Policy, and Cost-Benefit Analyses for additional information about the scope of the analysis in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*.

All supporting material submitted during the public comment period is listed by commenter in Chapter 8, *Attachments*.

GP875, **Anonymous**

Comment GP875-1

I am against the proposal to increase the number of loaded oil trains that pass though North Bonneville, Washington. May I remind you, the Skamania County Fire Districts and the Stevenson City Council have already expressed concern for the safety of residents. At this time we do not have the capacity to ensure our safety. Our only recourse is to evacuate our properties, if indeed we know when to do this

Response GP875-1

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation. For more information about the analysis of potential impacts in the extended study area, refer to the Master Response for the Geographic Scope of the EIS.

Comment GP875-2

Why did you not solicit comments from our area?? I only found out last week from a person in another community. Why are we ignored? Well the answer seems clear to me, you did not really want comments.

Response GP875-2

Legal notices for the release of the Draft EIS, comment period, and public hearing were published in the *Washington State Register* (201504472 and 201504475) on August 31, 2015. Email notices were sent to the individuals, tribes, agencies, and organizations listed in Draft EIS Chapter 8, *Distribution List*. A Notice of Availability was published on August 27, 2015, in *The Montesano Vidette*, and a news release was issued on August 31, 2015. Notice of the public hearings and public comment period

was published in the following papers: *Centralia Chronicle* and *Aberdeen Daily World* on September 26 and October 3; *Montesano Vidette* on September 24 and October 1.

Comment GP875-3

I am also opposed to any new oil terminals in Washington.

Response GP875-3

Comment acknowledged.

GP876, **Anonymous**

Comment GP876-1

Good evening. I speak from personal experience as a resident of Washington state for 40 years. I'm probably the only person in this room that dealt directly with the results of the spill of Grays Harbor in the early '90s.

I spent five days washing birds. Ninety percent of the birds we washed died a horrible death because we couldn't save them. That's the mortality rate. And that's at best. That's with volunteers working night and day trying to keep birds alive.

I doubt if any of you have ever gotten your hands dirty cleaning wildlife up in this oil. But it's like really heartbreaking and it really tears you up.

Things like loons and eagles and -- not just seagulls. Birds that people go and watch. I'm a fisherman. I fish in Chehalis River. I do volunteer work for tribal reserve on runs. I'm disgusted with this Environmental Impact Statement because it declares that nothing can be done but we should go ahead with this anyway.

Our politicians may have been prostituted out by oil, but people like you haven't been. And you're going to be held -- your feet are going to held to the fire whether in this world or the next world, and you really should keep that in mind. You're going to be judged. And if you don't want to be put in the same category as all of the corrupt politicians that are selling their souls for the oil companies, I dare you look in the mirror before you make your decision because people's lives are at stake, but people's children and people's children's children are at stake even more.

If you know what's happened to all our rivers lately in our country, they're being contaminated by industries, and then people's drinking water goes away. Water is the new oil. We don't need oil to contaminate water. Water is more valuable. What doesn't relate to you? Don't make mistakes.

Response GP876-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP877, **Anonymous**

Comment GP877-1

Thank you for this opportunity to speak about this very important proposal before us today. Last week I attended the Moral Action Climate Change events held in Washington, D.C. in support of the Pope's visit and his comments dealing with the moral issues facing everyone on this planet dealing with climate change and the rising temperatures. We need and we will shift our paradigm in regards to how we look at fossil fuels. More specifically, we need to look at the decision-making model that includes both environmental justice and social justice components. Yes, justice for our planet and for the people who share our resources, clean air, water, energy sources, food, sustainability of these resources and, yes, jobs.

I grew up in Longview, Washington on the banks of the Mighty Columbia River. The river is sacred to me knowing the importance in our region. It is a place where we had church and school picnics, my father fished there, smelt came up the Columbia into the Cowlitz River. I learned to waterski during high school off the sandy shores and, yes, it was a place for naughty teens to have fun, innocent parties, and, yes, it created jobs for our local economy.

I totally understand the urgency and potential opportunity for the Grays Harbor community to embrace and welcome 84 new jobs. I understand that. My father was an iron worker, and his jobs were building dams and bridges. Jobs are essential to communities.

But, when you consider this proposal in this new paradigm shift, we must include local, regional, national, and global effects resulting from our decision-making policies.

I want to address the most important concern I have which is shared with anyone living along the Columbia River. What if -- yes, I could list all the train wrecks with lethal contaminants that have cost millions in correcting the results in the aftermath or the cost of human lives and devastation to wildlife, but I will leave this to the scientific reports.

Here are my grave concerns, the outdated transportation system, infrastructure of our railroad system. I am concerned about the lack of transparency dealing with the routes, number of cars, what contaminants are carried in them. How can we adequately provide vital emergency services to potential explosions, derailments? Furthermore, who is going to pay for this?

The Seattle Times recently had an article about this very concern. Enough is enough. We need to put a moratorium on the number of contaminants, coal and oil and other deadly cargo, until we get a handle on public safety.

Response GP877-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water

flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP877-2

Second concern, really, really, the Columbia Gorge Scenic Byway. Scenic means tourism. It means something special, something we must take care of in order to fully enjoy.

What about those salmon runs? I envision a salmon trying to make its way up the fish ladder after a spill. Of course, we all know that our river and its fish and wildlife would be dead. No, we will fight to keep the Columbia Gorge free from this proposal, the largest proposal for a terminal in the U.S.

Twenty-five million gallons of Bakken crude oil? You must take into consideration the impact of sending crude oil through our states only to be a financial gain for industry seeking to make a profit off of our natural resource, the Columbia River. The daily threat is incomprehensible, unimaginable.

I want to remind you that our Native nations, the Quinault, Makah, the Warm Springs, Celilo Falls, Yakama Nation, Umatilla Nation, our sovereign peoples who have, under our U.S. Constitution, the right to their lands and resources. Under the Boldt decision, they have fishing rights which are the basis of their economy.

And private investors, who have nothing to do with the health of our natural resources here in the Pacific Northwest, want to build the largest oil export on the Columbia River and the largest coal terminal at Cherry Point on ancestral lands of the Lummi Nation, changing our state forever.

Toxic materials going to Asia where increased gas house emissions will continue to rise causing catastrophic consequences worldwide, creating both environmental and social injustices locally, regionally, nationally, and globally.

I stand in total support and solidarity with our Native peoples and their desire to take only what they need to survive and to respect Mother Earth.

Our white European ancestry of consumption must include giving up our dependence on fossil fuels.

What about our small communities along the pathway of increased shipments of crude oil? Toxic, deadly, noise pollution, and possible spills.

There is a small town in Washington along the Salish Sea, Bow, Washington. Its residents have, for years and years, fought to have the train whistles that sound off at four train crossings, creating 200 blasts every day.

They are in litigation and now are faced with spending tens of thousands of their own money in order to mitigate the effects of increased number of trains.

Are there not limits? Are communities taken into consideration?

In the mid '80s, there was an oil spill in Port Angeles. Anyone in making decisions about crude oil should be made to go to these sites of disaster to clean up birds. There are no words to describe walking into the makeshift local high school, with experts flown in, transportation costs out of their pocket, to help guide through the process of trying to clean up the waterfowl. So many died. Our birds, salmon, wildlife, they don't cope with these dangers. They just die.

I truly believe that the Pope's message to congress and to the United Nations is the start of global conversation starting with the sentence, Will this decision greatly impact the continuance and reliance on fossil fuels and is it necessary and will environmental and social justice be served and embraced locally, regionally, nationally, and globally?

The range of criteria for making critical decisions has grown exponentially as well as the possible results, consequences of those decisions.

Again, personal financial gain for private enterprise and 84 jobs do not in any way offset the thousands of negative consequences. Do not let this go forward.

Response GP877-2

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips and less than one tank vessel trip per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail and vessel transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative and could not be completely eliminated. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

Chapters 4, 5, and 6 of the Final EIS reflect updated information about ongoing efforts to address existing safety concerns within the extended study area. These efforts would also help to reduce any risks related to the proposed action.

GP878, **Anonymous**

Comment GP878-1

Hi, lots of people have talked about the lack of evidence that is in the DEIS or in some cases there's none. It's not just very plentiful. I don't know how you have enough evidence to make the decisions that you have made in many instances, especially in the instances that have to do with the birds of migration through our territory and stop in Grays Harbor, Bowerman's Basin.

I have a really, really long sight list. Most you see in Oregon. I have many sightings of just about every bird except for one. And that one species of bird I had only one sighting in all of my many years, 20-some, of living in Oregon. And now I've moved to Washington. And I can see this bird by the dozens or dozens of dozens during spring migration. What's the difference? I always thought that Washington was as beautiful as Oregon, but not more beautiful. So why do they stop here?

Well, the bird I'm talking about can begin it's trip north from Central America. It stops in San Francisco, feeds a while, and then flies further north to Grays Harbor, Bowerman Basin in the north bay. It stays there for a few days, feeds, rests before it goes on its last leg of its journey to the Canadian tundra where it nests. I want to ask you, what do you think would happen to that bird if it were here during an oil spill? Deny these permits.

Response GP878-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on birds.

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP879, **Anonymous**

Comment GP879-1

Westway and Imperium oil terminals simply stated, the issue is greed versus safety. But the question you must face in good conscience is will Hoquiam or Aberdeen be the next town of Lac-Megantic, Quebec that was incinerated by an oil train.

Even with new North Dakota law, the volatility of Bakken crude oil remains 13.7 pounds per square inch vapor pressure. The train that exploded in Lac-Megantic had an average vapor of ten PSI. Bakken crude should be stabilized, but this would require expensive treatment. North Dakota does not have plans to make the oil safer.

Keeping the volatile gases in solution during shipping, while extraordinarily dangerous, makes it extremely profitable. You're sitting here with the responsibility of public safety. The question facing you is simply will you support public safety or corporate greed? And you will be remembered for this very act.

Thank you.

Response GP879-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP880, **Anonymous**

Comment GP880-1

Good evening. I am Mother Goddess Liberty, and I'm here for the people of the planet. My title is Liberty Enlighten the World. I carry the sword of knowledge, the sword of truth and enlightenment.

But this is not enlightenment this enlightenment that I carry. It's light of my hand, the Declaration of Independence. The most sacred words of the document in the world, We hold those truths to be self-evident that all men, he meant men and women, are created equal. We are endowed, that means gifted by our Creator, with certain unalienable -- means you cannot take them away, the state cannot take them away -- rights.

These are the right to life, liberty, and the pursuit of happiness. Governments are instituted, created by the sovereigns, to protect these rights. The first right is the right to life.

This council -- this city council voted not to have this facility. They are the sovereigns of this land. Who are you to deny their stopping this?

There has been a flip flop. Government now thinks they're the sovereigns. The people are the sovereigns. The meek will inherit this earth and as you can see the meek is standing up to do just that.

The whole world is being threatened by climate change. That means everyone in government has to stop this threat to the safety and happiness of all of us.

Response GP880-1

Comment acknowledged.

GP881, **Anonymous**

Comment GP881-1

Ah-hoy-ya, greeting. I'm a native of Grays Harbor and Cowlitz Indian tribal member, my ancestors chased food and trees in a livelihood for many years. And if you look at the tribes in our region, we have all settled on the coast for natural resources, a way to live and survive. Natural resources have provided us jobs, but they also provide us with food.

I think it's very important that we not be tricked into believing that jobs and the incomes that would be derived from this, once again with another project coming in with a few handful of jobs that then leave our area and we are then put into another economical situation.

We've been struggling to get out of this. This would be devastating to us here on the harbor. Amazing, that people in the eastern state come to watch shorebirds -- of all things, shorebirds

because they follow the migration of these birds. Why would they want to come here if we have a disaster?

And like many, many people have said, it's not if, it is when. The media is amazing in presenting issues to us up front immediately, but they're also amazing in not following up. Out of sight, out of mind.

Let's talk about EXXON VALDEZ. Let's talk about Texas. Let's talk about all of these disasters. Let's go back to see what kind of recovery we've had from these situations. I blame the media for not showing us that, so it's up to us to prove some of that.

Thank you.

Response GP881-1

Comment acknowledged.

GP882, **Anonymous**

Comment GP882-1

Well, this won't take two minutes. Well I hate public speaking but I would feel badly if I left without saying a little something. I live in Hoquiam. I'm -- the way I see it I think I'm about 620 feet from the rails. So yeah, that's a concern, but I think my biggest concern is the big picture.

And I think climate change is real. I think we're in it, and it concerns me to be possibly part of the generation that leaves the world a little less better -- less well than the way we found it. And I've tried to -- tried not to be a contributor, but I feel maybe I haven't done the best I know how.

So, that's my concern is the oil companies use kind of a divide and conquer strategy. And we are just a little community. And somebody's got to stand up to these guys. And I don't know why it shouldn't be us. This is not going to benefit our area. It's not going to benefit the world.

So, let's stand up to them and do the right thing. That's all.

Thank you.

Response GP882-1

Comment acknowledged.

GP883, **Anonymous**

Comment GP883-1

Well, I moved here three years ago from Wyoming. I had ten years of challenges of the oil and gas industry there over the air pollution they were creating. On a science basis, I'm a retired physicist and nuclear engineer.

And as I've gone through this crude-by-rail project beginning two years ago, the thing that stood out in my mind is what appears to be an absence of detailed preparation to address a spill.

A spill will happen. I don't care what that industry says. They can be as careful as they claim to be. There will be a spill. And what worries me, then, is the number of jurisdictions that are likely to be brought into play over such a thing.

And I'm wondering if anything has been done at the state level to identify the different jurisdictional players, how they should interact, how they can interact, how well they're trained to interact, how large their budgets are to interact, what they know about the equipments they're going to need to react, how they're going to procure those equipments, if they are at all, and how well-trained they're going to be to use those equipments.

Then add to that, the industry. What preparations are going to -- or actually, requirements are going to be imposed upon them by the state and the local municipalities to immediately notify of an accident, a spill? Who will have the prime responsibility for disseminating that notice? Who will have the prime responsibility for reacting, organizing all of the jurisdictions to react to a spill situation.

What real attention has the industry and the state given to the issue of seismic damage to the storage apparatus, tanks, et cetera, pack lines? What have they done to certify, absolutely, that the kind of earthquake that's posited for this area can be ridden through by that equipment?

Response GP883-1

Draft EIS Chapter 4, Section 4.2.1, *What framework prevents incidents from happening?* describes the formalized planning framework in place to address risks related to oil spills, fires, or explosions from the terminal operations, rail transport, or vessel transport. The responsible party may vary during the transport of crude oil. This section describes the requirements for planning and preventive equipment and design. Section 4.2.2, *What framework prepares for an incident?* describes federal and state regulations to prepare for an incident, the integration of plans, and drill and exercise requirements.

Final EIS Section 4.2.3, *What framework provides responses to an incident?* has also been updated to better reflect existing response capabilities and resources in the study area, including information identifying existing gaps from the Marine and Rail Oil Transport Study (Ecology 2015). Final EIS Section 4.7, *Impacts on Resources,* has been updated to better reflect how the proposed action could affect emergency service responses.

Final EIS Chapter 4 reflects additional mitigation measures proposed to address gaps in emergency preparedness planning and response capabilities. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions.

Chapter 4, *Environmental Health and Safety*, identifies other proposed measures to ensure that broader prevention, preparedness, and response planning involves the appropriate stakeholders and that updates to any plans applicable to reducing risks related to the proposed action contain appropriate applicant information and participation. To the extent possible, as outlined in the Master Response for Mitigation Framework, measures that address the need for more coordinated and focused planning clarify the role of the applicant as appropriate.

Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7

describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP883-2

And more importantly, given that the University of Washington studies show that this area could subside as much as ten feet, and thereby become underwater, what has the industry and the state done to address that likelihood, if they are going to store in large tanks?

And then another consideration would be, should that kind of event take place when there's a long string of railcars parked down there loaded with oil, they will start to float. And who knows where they'll go when they're caught up in the backwash of a tsunami.

Response GP883-2

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunamis, and impacts remaining after mitigation.

Comment GP883-3

A myriad of details requiring very fine-tuned thinking and preparation for all kinds of scenarios that are entirely possible for this area have to be in place before major operations of this type are permitted to begin.

And I see no indications, public or otherwise so far, that that level of preparation -- planning, preparation, oversight, has been formulated, let alone analyzed and decided upon as to implementation.

Those are all of the fine details that I believe ecology and these municipalities that are in here really need to sit down and think hard about.

Response GP883-3

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP883-4

Oh. And I guess one other aspect of this is that since the Imperium, now renamed, movement organization is pressing hard to obtain these port rights, they should be imposed upon to place a very substantial monetary bond in escrow. And it would have to be along the order of a billion dollars, in my judgment, to start paying immediately the cost of response to a spill.

One of the big constraints I know is going to be on the state municipalities will be funding. And the industry is bringing this on and so the industry should bear the brunt of the costs that are going to be incurred in preparing for and reacting to that inevitable spill incident.

Response GP883-4

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

GP884, **Anonymous**

Comment GP884-1

Well, I just would say I'm opposed to any of the oil expansion and oil trains coming into Washington State and just believe competitive pricing with alternative fuels is one reason to stop the fossil fuel development.

And I do some fishing, and I was involved with the tours and the development, and know that any oil spills have a detrimental effect on the oceans.

And I did travel up to Alaska. It was the same year as the Valdez oil spill up there. And just to think of the environmental disaster that happened up there, if that could happen around Washington State, it would be just devastating to a lot of tourism, and also all of the marine life, and fisheries, probably. And then they have a lot of the shore birds and the wildlife refuges around the area here.

And just another oil train is potential for accidents and fires. I was a volunteer firefighter for a while and I just don't want to see any huge accidents around any towns or in the Columbia River area.

And I really think we have a chance to do a lot of alternative energy, because Oregon has -- they're on the verge of really expanding wind energy off the coast of Oregon. And I think we can just replace a lot of the oil industry and oil energy with other types of energy. We don't have to have all the environmental effects of the oil spills.

Response GP884-1

Comment acknowledged.

GP885, **Anonymous**

Comment GP885-1

I would like to say that I am strongly against the oil terminal because of the significant risks to human health in this community from the potential of explosions, and that those risks even include death for members of this community.

And I'm also against it because of the risks to the marine environment, which this local economy and the tribes depend on.

Response GP885-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP886, **Anonymous**

Comment GP886-1

I was just thinking about this whole thing. We don't want them here in town. What happens if something breaks over and one of those things goes all over the place for the City, and my thoughts on the whole thing were that they don't pay -- big oil doesn't pay any taxes. They offshore it elsewhere. It was in the paper even. The biggest corporations aren't paying any taxes in our country. They owe $2.2 trillion in taxes, all the big corporations, and why should we accommodate them here, and where is their money to come down here and find another way of doing this and paying for this?

Response GP886-1

Draft EIS Chapter 4, *Environmental Health and Safety,* Sections 4.4.5, 4.5.5, and 4.6.5, discuss who would pay for the response and cleanup of an oil spill at the terminal or during rail or vessel transport, respectively. Refer to the Master Response for Liability and Responsibility for Incidents for a discussion of liability and the levels of financial responsibility required by federal and state law and an explanation of how these issues are addressed in the Draft EIS and Final EIS.

Comment GP886-2

And another thing I'd like to know if the City of Aberdeen and the local cities around here, is the government against what's going on, you know? It would be pretty trippy. So that's all I can think of so far. I am concerned about all of that.

I saw these trains coming through town, but I was kind of concerned about it. The water is already polluted out there.

We can't get clams anymore. What if we get another big spill to that type of effect that could cause a lot of marine biology damage, and who covers it, you know? All of a sudden nobody is talking about who's going to take care of any damage, and so I would rather see a pipeline come in here than trucks and stuff like that.

I'm from California, and I've seen what the ships do from coming in there. They're blocking Long Beach. It's blocked up with all of these big trucks and everything else coming in there. It's going to be the same way here in this town and at our expense, I think. So that's probably about all I have to say, I guess.

I'm concerned about it after finding out what they're doing in our little town here. I guess I don't have much more to say. I'm just the average citizen, you know, wondering why in the heck we're supporting all of this, and what are they going to do for our city here getting to bring oil here besides causing a lot of congestion. I don't see both open sides on this thing. So what the heck? Thank you

Response GP886-2

Comment acknowledged.

GP887, **Anonymous**

Comment GP887-1

I'm against the oil trains coming in here because of the environment, because of the dangers of what it could do to the people who live here, to their livelihoods.

I live a block from the train tracks so I'm a little nervous about that. If there was, you know, an explosion, I'd be gone, and I'd like to live to be an old lady. I guess that's all I have to say.

Response GP887-1

Comment acknowledged.

GP888, **Anonymous**

Comment GP888-1

The reason I'm talking with you is because I had a phone call from someone who was evidently from Seattle and is concerned about the oil trains going through Seattle as well, and they wanted to know if I would be here on this day to see what you folks had to say. And I told them, Listen, I will go. I just don't believe in lip service. I don't believe in people who talk and don't have an agenda, okay.

I've been told by a very wise man, if you present the problem also present a possible solution. Not the solution but a possible solution because it gives us something to hold onto and fight for, okay.

I wanted to know about legalities and wanted to know what are our legal rights, okay, and what's in it -- I know what's in it for the oil people. What's in it for Aberdeen, what's in it for Grays Harbor?

We have so much to lose. We have the wildlife, we have the water fowl, we have so much that is pure and pristine, and it brings people here, it brings the tourism here eventually. We need that. We need to protect that. I wanted to know what's in it for us. Evidently there's nothing in it for us. I'm very, very strong on this because I don't like unfairness, okay.

Now, another thing is I wanted to know about legalities. What are our legal rights? Everybody has legal rights in something. There's got to be something that we have legal rights in because you can't fight a battle if you don't know what the ground rules are, okay. so that was important to me as well.

He didn't have any answers for me, which is why I'm here because I'm kind of hoping you guys would address it.

Anyway, I've been passed some information. I'm told if I have any questions or if I have any comments. They asked me if I wanted to speak, I told them, no, I'm shy, but I do have opinions, which I just shared with you, okay.

I'd like to see if you guys really believe what you're doing and have some muscle behind you because that's the only way we're going to get anything done. We have to have some muscle. I understand that the Governor is not thrilled about this and is not taking a stand either way, and I'm disappointed because I thought he was a good man for the job. I'm very disappointed.

I will support -- after hearing what is being said inside, I will support you guys or if I feel that there's not enough there, not enough people believe in what they're doing, you're going to lose me, okay. Because I won't fight for something unless I know that there's somebody behind it. Amen.

Response GP888-1

Comment acknowledged.

GP889, **Anonymous**

Comment GP889-1

I'm speaking for the shellfish growers of Grays Harbor. So there's one element that I wasn't able to get onto paper or in my oral testimony.

The thing that concerns me about crude oil is it looks like crude oil from Canada will be part of the product that gets shipped out of Grays Harbor because the railroad has said they have to take the product -- it's a foreign product, so it's not restricted by our own law, and the other thing is if there's a profit motive, it will be handled in Grays Harbor by these two, possibly three projects.

So one of my concerns for the growers and myself is the fact that the crude oil that comes out of Canada or Bitumin is heavier than water and when the thinners evaporate out of it, it sinks. When it sinks, it will move along the bottom, and it will be tied up into the mud and sand in the bay if they don't get it really quick.

The problem is within an hour, under the right conditions, this crude oil, Dilbit or Bitumin, will go out in the ocean or be trapped in the harbor because there's no way they're going to get containment or a mitigated process to stop this crude oil once it is spilled.

So here's what I think will happen. The product gets spilled, it's not captured, the solvent will dissolve and go into the air, the toxins will settle to the bottom and, from there, will roll up and down the bay, back and forth, north and south, east and west on every tide change or wind or anything that will make a move.

So, within the harbor, the Corps of Engineers moves a million cubic yards of earth picked up by the Corps dredging to maintain the channel depth. So, when the Corps dredges this up, within that million cubic yards will be oil, tar balls, and everything that's left over from the spill.

Grays Harbor has no place to dump this kind of dredge spoils. It will be in the environment for longer than one dredge cycle. So, for many years, the Corps will be dredging up a million cubic yards, and they have no place to dump it. And, by state law, they have to dump it on an upland site, which will drive the cost of the dredging up beyond the cost/benefit ratios.

So basically any kind of spill that comes out of Canada, which is Bitumin or Dilbit, will force the harbor into being closed down for shellfish, fishing, any other activities at 30 percent of where Grays Harbor County's economic benefits come from. So basically 30 percent of all of the economic activity in Grays Harbor is from the estuary and the ocean.

So basically that's what I have to say. I think this was not in the EIS. I think nobody has even thought about this, and I've -- the growers are really concerned that this kind of product will destroy the estuary for a long time.

Thank you very much. I just have to say that because this is something that can't be mitigated, it hasn't even been taken into consideration, and it's such a destructive course. We basically lose all our production in the estuary and the ocean and the clam beds. Thank you.

Response GP889-1

The analysis of impacts in the Draft EIS considers the crude oils identified under the proposed action: Bakken crude oil and diluted bitumen. Final EIS Chapter 4, Section 4.3, *Risk Considerations*, reflects updated information about the chemical properties of these two types of crude oils. For additional information about the most likely sources of crude oil, refer to the Master Response for Crude Oil Extraction, Transport, and Combustion. For additional information about how different types of oil were considered in the oil spill modeling presented in Draft EIS Chapter 4, *Environmental Health and Safety,* and Appendix N, *Oil Spill Modeling*, refer to the Master Response for Oil Spill Modeling Methods.

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. These measures include the provision of additional firefighting equipment, spill response and recovery equipment and other tools, and annual emergency response training opportunities to local jurisdictions. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion.

Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information about the analysis of emergency planning and response capabilities. For information about the analysis of potential impacts in the extended study area, refer to the Master Response for Geographic Scope of the EIS.

GP890, **Anonymous**

Comment GP890-1

Well, I guess where I'd like to start is in 2010 the Seattle Times reported that only two-thirds of passenger trains run on time. So only two-thirds run on time between Seattle and Portland. The desire by the State was to reach 90 percent on-time performance.

And, with this project, EIS states that most crude oil shipped by rail in Washington is currently going through the Columbia Gorge but could transfer over to other routes, and in the same Chapter Five, BNSF has not specified a train route for crude oil trains in Washington State. So I'm concerned about the effect on passenger rails.

And so I have a couple of statistics for on-time performance for passenger trains.

With the Cascades, the on-time performance for the last 12 months is 74.6 percent, and in August of 2015, it was 81.9 percent. And, of the causes of delay, the train interferences was the primary cause of delay, and that was that 39.6 percent and 76.9 percent of 39.6 was on BNSF Railways.

The Empire Builder, which also uses the tracks shared by freight trains, the on-time performance in the last 12 months was 54.6 percent. In August of 2015, it was 38.7 percent. The primary cause of delay was traffic signals, and that was 32.4 percent, and 89.3 percent was on BNSF Railway Company. The second cause of delay was train interference. That was at 25.5 percent, and 81.4 percent of that was BNSF.

Let's see. So production is expected to increase from two million barrels -- I'm sorry. Production is expected to increase from 1.2 to two million barrels per day, and with no known route for BNSF which brings oil to this location on the PS&P, I'm concerned that passenger rail will be severely impacted.

In 2010, Washington State received approximately $782 million in federal funds to improve high-speed rail service on a section of Pacific Northwest Cascade Corridor, one of 11 high-speed rail corridors designated by the federal government.

The Pacific Coast Collaborative Leaders Forum articulated their vision for high-speed rail. Rail, particularly high-speed rail, can deliver significant benefits to the region including advancing climate change goals, energy conservation and reduction, and job creation for the region.

The absence of details concerning freight train routes in extensive study areas demands a comprehensive review of the possible impacts on passenger rail. Thank you.

Response GP890-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for Geographic Scope of the EIS. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about rail traffic under cumulative conditions.

GP891, **Anonymous**

Comment GP891-1

Last month, September 2015, Daily World articles and network television news described a small, seaworthy, and well designed Boston Whaler type craft which had overturned in rough seas as it attempted to return from the Pacific Ocean into Grays Harbor.

One woman's body was eventually recovered floating in the ocean significantly south off of the Oregon Coast. Her male companion's lifeless body was recovered several days after hers south of Westport.

Shipwrecks of significantly larger sail, steam, and diesel vessels are well documented in the excellent book, "Shipwrecks of the Pacific Coast" by James Gibbs, which should be researched and noted in this EIS.

Gibbs includes a profound map showing locations of 41 large ships lost between Port Angeles and Astoria prior to 1957. On page 54, Gibbs describes the SS YORKMAR, a 7,200-ton Liberty-type freighter owned by Calmar Steamship Corp. which had gone aground in attempting to cross over the Grays Harbor bar December 8, 1952. In ballast, she was driven high on the beach on a flood tide. At low water, the vessel rested high and half dry. She lay on a stretch of beach from which only once in history a stranded ship ever regained its freedom.

Gibbs states, Between Grays Harbor and the Columbia river perhaps more strandings have occurred than on any other sector of the Washington Coast. The entire beach is composed of long sandy stretches piled up by the deposits from the Columbia River carried northward by the prevailing currents which constantly form dangerous shoals. Because of these shoals, government dredges must be constantly employed on Grays and Willapa Harbors.

On Page 44, Gibbs states, At Grays Harbor, the entrance is very narrow and very dangerous if the pilot book is not followed explicitly. Several ships have left their gnarled bones to rest on these treacherous bar sands. Farther north the sand subsides in favor of rugged boulders and terminates in precipitous cliffs that rise sheer from the ocean.

Gibbs' book includes excellent photos of many large ships thrown up against cliffs, broken in half, or sunken in the sea. The fate of these ships along with the EXXON VALDEZ off Alaska filled with the oil which was to despoil a major coastline should be fair warning to us to say no to the shipping of oil from Grays Harbor.

And there have been 50 or 60 big ships that have foundered in that area or trying to get in over the bar or just north of the Westport bar, exceptionally, unusually dangerous area, and these are big ships that have all of the radar and all of the stuff, but they still foundered.

All we need is one ship foundering out there that had oil on it like the EXXON VALDEZ.

I ended my Army time in Valdez 50 years ago. This oil on that beach up there -- how long ago was the EXXON VALDEZ, 25 years, 20 years ago. There's still oil there.

I taught architecture and planning at Mississippi University, and we've had oil spills off of that Gulf Coast. They're still there. They haven't been able to clean it up. We don't clean those things up. They aren't that cleanable. They do damage for extended periods of time.

And whoever would approve this is signing the death note for wildlife, for fish, for crabs, for clams, for you, and for me. They don't need to do that. This needs to be turned down. Thank you.

Response GP891-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP892, **Anonymous**

Comment GP892-1

This is for Westway and Imperium. Basically just one question, if allowed to proceed with your oil transport plan in Grays Harbor County, can you assure its citizens that you will be using only the newest rail tanker cars or are you going to be using the older ones that have been leaking and exploding all over the country? That's it.

Response GP892-1

Draft EIS Chapter 4, Section 4.5.3.1, *Voluntary Measures and Design Features*, describes the applicant's voluntary commitment to not accept crude oil transported by DOT-111 tank cars. The

measure specifies that the applicant will not accept crude oil by rail unless the following actions occur:

- The rail cars meet or exceed the new U.S. Department of Transportation Specification 117 design or performance criteria.
- Existing tank cars are retrofitted in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 FR 26643).

GP893, **Anonymous**

Comment GP893-1

(Two women singing.) We present an urgent message here today. Don't develop Westway down in Grays Harbor. All the dangerous fumes and fires are well known though some conspire to erect a terminal to have their way.

Our protest now is here in Aberdeen. Health and safety are essential every day. They don't care about abuses, they came up with lame excuses. We insist that they should clearly stay away.

We demand that this proposal be denied to avoid the tragedies we could describe. They don't offer job and skills, Grays Harbor people may get killed. We demand this proposal be denied.

We present an urgent message here today. Don't develop Westway down in Grays Harbor. All the dangerous fumes and fires are well known though some conspire to erect a terminal to have their way. Thank you.

Response GP893-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP894, **Anonymous**

Comment GP894-1

Three years ago now the American Nurses Association passed this resolution to ban all fracking of oil. Please read these copies of the Nurses Resolution. They began this research and nurses -- registered nurses do research, and they're very serious. It's not cute, little nurses. They actually have people that have doctorates in nursing just to make sure it's okay. And, as you can see from the resolution, it's very well researched. The references are in the back.

I just wanted to say that it began because people were on the farms and they agreed, okay, you may put your fracking equipment on my farm. And what happened to start this ball rolling with the research, nurses went -- received patients to the emergency room who had been fracked they call it. The patients from the fields and from the farms ended up in emergency rooms, and then they ended up in intensive care deathly ill, and even the nurses that touched patients who had been fracked and doctors in emergency rooms ended up in the intensive care unit deathly ill.

And the fracking companies said, No, it's a trade secret. We will not tell you what you have just been poisoned with.

So doctors didn't have the anecdote, and they didn't know how to treat the people just by symptomatic control and hope they lived through this terrible evil that the companies have no conscience. That's one example.

And the nurses insist that people stop harming families especially in these rail towns here. I will not review the devastating effects on health but because people keep hearing that over and over, and why is it ignored.

I do have a few questions. Diesel fumes, were they able to test for worst air quality after the 1,100 diesel spill into the Columbia River last Friday? I guess that's October 2nd.

Can we expect more diesel fuel to pull more trains; right? So diesel evaporates, and those train fumes contain formaldehyde, arsenic, and benzine; right?

So whereas the crude or coal transporters or oil frackers will not help us, will each city need to construct special buildings with air filters during the dangerously high emissions from many more trains.

Will they give out air filter masks?

With newer emission control, will the trains pollute in a way that spreads that pollution over several days?

Will the trains stop running when the pollution becomes too deadly?

With new standards like in Louisiana and Texas, those oil refineries pollute extra on the weekends if they had polluted too little during the weekdays. So will trains do that?

Are tests being done now for the toxins already present from coal, oil, and diesel in our water, air, and land?

We need those tests as a before before adding more pollution trains here.

Some politicians do not seem to understand what the contents of the crude oil tankers are, so I ask if you have not explained what is in these cars to the politicians and also ask them what they should tell their citizens. Should all people with children leave here?

Railroads used to buy the homes of people they forced out. Why not now?

And here's what I wanted to say today. What alternative modes of transportation are now on standby in case traffic is blocked after train accidents? Extra helicopters to get patients to the hospital emergency rooms? Why doesn't a transport corporation pay for that or help with that?

Nurses want polluters to stop harming people and to pay for their health care when negligent.

And, since I have so much time, I will just say I was in New Jersey for September 11th. New Jersey nurses were called, give us your phone numbers, be at the ready when survivors come from New York. We will need help getting them to New Jersey hospitals.

But there were no survivors. There were not enough survivors to need us, and that could happen in any of these rail towns here. And these trains do catch fire and they do explode and they are smelly and dirty. So they will drive out all of the local business and the people that are left are in grave, grave danger from the accidents. And, as a nurse, I agree with firemen, we're not ready. I don't want to see a person with no skin ever.

And I think that's all I have to say. Thank you very much.

Response GP894-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Final EIS Chapter 4, *Environmental Health and Safety,* has been updated to better reflect existing local and statewide emergency service response capabilities and resources, updated planning requirements, clarifications about the potential impacts of the proposed action on local emergency response providers, and additional mitigation measures to reduce risks. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could occur in the event of an oil spill, fire, or explosion. Refer to the Master Response for Emergency Response and Planning Gaps Evaluation for additional information.

GP895, **Anonymous**

Comment GP895-1

Simply stated the issue is greed versus safety, but the question you must face in good conscience is will Hoquiam or Aberdeen be the next Lac-Mégantic, the town in Quebec that was incinerated by an oil train.

Consider this, even with the new North Dakota law, the volatility of shipped Bakken crude remains at 13.7 pounds per square inch vapor pressure. The train that exploded in Lac-Mégantic had an average pressure of ten PSI.

Could Bakken oil be made safer for shipment? The answer is yes.

For example, Texas crude oil from the Eagle Forks Formation is more volatile at the well but is stabilized before shipment.

Bakken crude could be stabilized, but this would require expensive treatment.

North Dakota does not have the facilities to make the oil safer. The cold calculus of the Bakken producers is this. Keeping the volatile gases in solution during shipping while extraordinarily dangerous is very profitable.

You're sitting here with a fiduciary responsibility for public safety. The question facing you is simple. Will you support public safety or corporate greed?

Response GP895-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP896, **Anonymous**

Comment GP896-1

My feelings on the environmental impact that this oil will have on the environment are very strong.

I've grown up here, born and raised in Grays Harbor. I'm a fisherman, I'm a farmer. My family farmed out here and fished my whole life.

In coming up as a young person in the fishing industry, it's getting harder and harder to go forward and this would essentially, if there was an oil spill, it would null and void the entire area. That's about it.

Response GP896-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on fisheries.

GP897, **Anonymous**

Comment GP897-1

Ladies and gentlemen

I wish to only speak on one issue concerning the oil transport and storage. The railway bridges. Who owns them? Who is responsible for their maintenance and upkeep? The port, city, county state or federal governments.

When was the last time any maintenance was done on any of the bridges themselves. It appears to be something everyone has overlooked. There are many bridges the trains must cross over before reaching the port. These bridges are very outdated and little or no maintenance has been done. Liability will be on the bridge owners.

As the port commissioners, are you willing to take that responsibility when the potentially devastating tankers come through and lives and any existing jobs are destroyed.

How many years has it been since the Gulf disaster and the oil companies have just finally settled with a mere pittance for what has been destroyed and it is still not returned to its original condition.

The bridges are only one area that hasn't been addressed but I feel it is the weakest link and the one that makes the citizens most in the most danger. Take a good look at the bridge crossing the Wishkah river where it joins the Chehalis river. The disaster waiting to happen there is unthinkable.

Thank you.

Response GP897-1

Draft EIS Chapter 3, Section 3.15.4.5, *Ongoing Maintenance and Inspections*, describes Federal Railroad Administration (FRA) track and bridge maintenance and inspections requirements and train and rail car inspection requirements. PS&P is required to comply with these regulations under existing conditions and would continue to be required to comply if the proposed action is implemented. Final EIS Section 3.15.4.5 reflects PS&P commitments to additional safety measures with respect to the transport of crude oil, information about the requirements of FRA's bridge management program, and the most recent results of FRA's bridge inspection reports. Nonetheless, compliance with existing regulations and implementation of the mitigation described in Chapter 4, Section 4.5.3, *What mitigation measures would reduce impacts related to rail transport?* would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

GP898, **Anonymous**

Comment GP898-1

Thank you for the opportunity to comment again on these two projects. Previous correspondence and testimony expressed that these type of projects will be proposed in an area which is susceptible to sea-level rise, earthquake activity, and is in a tsunami zone.

Despite the logic of the rejection of these proposals due to these major factors, we're still going through the process and asking for the permits to be denied.

As suggested in the DEIS, in all likelihood the project will have an accident, oil will be spilled, an explosion will occur, and the community will suffer loss.

Since this is the basic conclusion of the DEIS that accidents are unavoidable, we ask how is it going to be mitigated then? We would like to see the specific mitigation actions for the areas that are not mitigatable.

The DEIS has determined that the project, one, will increase rail and marine vessel traffic, will increase the risk of derailment, collision, spill, fire or explosions.

Response GP898-1

Refer to the Master Response for Mitigation Framework for more information about the development, implementation, and enforcement of mitigation measures. For more information about risks related to earthquakes, tsunamis, and liquefaction, refer to the Master Response Seismic Risk and Design Requirements.

Comment GP898-2

The project would cause increased air pollution from diesel trains and vessels. It will increase noise, it would have a harmful impact on tribal resources, and increase vehicle delay at railroad crossings large enough to disrupt emergency vehicles to respond. If those are not mitigated, then there is no reason to permit the project.

Response GP898-2

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

Comment GP898-3

Specifically in Table 31-2, the probability of stronger earthquakes in the area should be realized to show the latest data by Goldfinger, Oregon State University.

The 8.0 projections are not ten to 12 percent, it's 37 percent, and a one to three chance that in the next 50 years we will see that size of an earthquake.

Response GP898-3

Refer to the Master Response for Earthquake Probabilities for an explanation of how the probabilities of strong earthquakes reported in the Draft EIS relate to those identified in recent studies.

Comment GP898-4

In your assumption about climate change, you assume sea-level rise will stop at the end of the century, but NASA studies have just concluded that the loss of the ice sheet will continue for centuries. That research needs to be included in the EIS.

Response GP898-4

Final EIS Chapter 6, Section 6.5.1.2, *Cumulative Impacts*, *Climate Change*, considers the impacts of sea-level rise in 2050. It does not assume that this is the endpoint of sea-level change, but it is a reasonable period for considering the impacts on the proposed facilities.

Comment GP898-5

In your EIS, please describe how oil trains will affect the safety and wellbeing of other communities other than Aberdeen and Hoquiam.

Ecology in the City of Hoquiam should use the analysis and findings of this flawed DEIS to reject these terminals since the risk of oil spill during rail transport at the terminal site and during marine vessel transport cannot be fully mitigated, and if a spill occurs, the environmental damage would be significant.

Response GP898-5

Draft EIS Chapter 7, Section 7.2, *Social Policy*, considers the impacts on the communities in the study area. Impacts in the extended study area are addressed qualitatively for the reasons discussed in the Master Response for the Geographic Scope of the EIS.

GP899, **Anonymous**

Comment GP899-1

I'm here to speak out against the dangerous crude oil terminals proposed in Grays Harbor. I'm a master's prepared registered nurse with a PhD in International Health. My area of expertise is critical care and trauma. So I think about that in terms of what I say about this.

I've looked at the numbers that are proposed in terms of predictions and the risk of deaths.

And, when I look at the Department of Transportation numbers, they talk about an average of ten oil trains will derail per year for the next 20 years, which totals 200 derailments. So, when you look at that number, that's very low to the actual number of derailments.

The numbers from the northeast between June 2011 and December 2013, a freight train derailed on average every 3.5 days. That's 104 derailed trains per year. Over 20 years, that adds up to 2,080 train derailments.

So my guess is the truth lies between that 200 and 2,080. That's a very unreliable number. So it's hard to use this to predict actual risk.

If you begin to look at the numbers associated with the death that are related to train derailment you, again, see actual numbers of 47, the Quebec Province crash and explosion to DOT estimates which are 200.

When you start to add them up depending on if you multiply 200 by 47 or 200 by 200, the numbers become -- they have great differences in their meaning. I think we are subjecting ourselves to great risk by doing this.

When I look at the risk of a 100-car train and how much oil it holds and then compare that to the amount of oil that would be held in the terminals, basically the two terminals would be a catastrophe just waiting to happen.

When you superimpose that on the disaster zone that we live in, we are looking at disaster upon disaster happening, and I think we tend to underestimate the occurrence of those rare events.

We talk about 1,000-year floods, but it was just a devastating flood in the Carolinas. We talk about landslides, and we don't think that they happen, but we see them more commonly here. One in the last year right here in Grays Harbor itself.

When you look at the risk to our health, the environment, the economy, the risk is just not worth the oil that would be transported through this area.

And I submit that the risks that have been presented are also underestimated, that they would actually be greater. The only thing that can be predicted with certainty is that if the oil spills, we will not be able to fix it. And, because of this, I believe that we must say no to oil by rail.

Response GP899-1

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that

would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

GP900, **Anonymous**

Comment GP900-1

I worked heavy highway and construction my entire life so we do things that are environmentally sound. And Imperium, their biodiesel was good. All of a sudden, regular oil is not good. In my opinion, what's the difference? If they don't have any spills, which if it's done right, Cherry Point doesn't seem to have a problem with spills and they've been refining oil up there for, what, 50 years.

So I'm not against it, I'm not opposed to it. I don't believe that oil should be on a train. I believe it should be in a pipeline.

I've done lots of pipeline jobs. If they're done correctly, which every weld is inspected, every weld is x-rayed, anywhere it's near water they put concrete coating on the pipe. There's never a cigarette butt or anything left.

So that's my opinion. I'm an engineer, so I can't speak for them. I don't think many of them are going to come by. I'm about the only one that is active politically. Anyway, that's my opinion on it.

Response GP900-1

Comment acknowledged.

GP901, **Anonymous**

Comment GP901-1

Thank you for giving me a voice. I'm a tribal member. This ocean, this land, and these rivers, lifelong, belong to the Quinaults. Quinault Indians belong to this ocean, this land, this river, and Lake Quinault. We live in harmony with nature. We are losing our salmon to global warming, clams to red tide, our forest to greed of big timber. They've tried to exterminate and simulate Native Americans for 500 years. To agree to the Westway Imperium projects, they finally accomplish that if this is not denied.

Thank you.

Response GP901-1

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action.

GP902, **Anonymous**

Comment GP902-1

Well, I came to express my concerns with this project in that the issue of the trains traveling past my farm on a continuous basis is going to be extremely annoying to me, and I do have trouble sleeping with the noises that the trains make now, and if we increase that significantly, I'm afraid that I'm going to be a crabby, old man. I don't want to be that way.

But that's really secondary to the major concern that I have which is living near -- on the Chehalis River and knowing the nature of the land and possibility of rapid water coming down off of the hills and floods my place. It gets completely inundated with flood water. I'm concerned about the safety of the tracks and, with heavy use, the possibility of a spill in the water and damaging the fish significantly.

Response GP902-1

Draft EIS Chapter 3, Section 3.15, *Rail Traffic*, describes the existing state of the rail line and future maintenance projects. The impacts of oil spills on specific resources in the Chehalis River and sensitive species in the river are presented in Final EIS Chapter 4, Section 4.7, *Impacts on Resources.*

Comment GP902-2

And more importantly, I think this issue of building these tanks on land that is prone to danger from a tsunami or earthquake is absolutely ridiculous. I'm sure others have commented on that.

Response GP902-2

Refer to the Master Response for Seismic Risk and Design Requirements for an explanation of how regulatory requirements and proposed mitigation measures would reduce potential impacts related to earthquake and earthquake-related hazards such as tsunami and liquefaction.

Comment GP902-3

The danger of the spills to the wildlife, to the fish in the river, and to the birds are very, very dear to me. I have been a member of the Audubon Society for four years and find the possibility of catastrophic failure in the estuary and wildlife refuge to be something that is taking away from future generations, things that I've enjoyed and been able to share with others.

Response GP902-3

Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion.

Comment GP902-4

So the other thing that I think bothers me the most is we have recognized now that we are in a situation of severe climate change. The climate change is going to continue. It's a question of how intense it's going to be. And, while we talk about it, we do nothing about changing the manner in which we continue to produce the carbons and other gases that's causing the climate change to increase.

The only thing that this project does is expend a tremendous amount of energy to produce a dirty energy, the oil, which will exacerbate the climate change problem. And quite frankly, the climate change is actually beneficial to me in that I'm a farmer. I'm harvesting beans today, which I didn't used to be able do until the first week of September.

But, in general, the climate change is not good. The forecast for other farmers and drought and other things are going to increase. And, at some point, we simply have to recognize that the economic value and gain to be derived from fossil fuel extrapolation and burning is a failed economy.

Response GP902-4

Refer to the Master Response for Purpose and Focus of the EIS for a discussion of how the Final EIS is used by agency decision-makers in considering permits related to the proposed action. Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion for information on the potential sources of crude oil and the potential for the proposed action to drive production at those sources.

Chapter 7
Form Letters

This chapter presents responses to form letters. Table 7-1 lists the form letters received and the number of signatures contained in the original submission. The complete text of each form letter is presented below the table, followed by a response. Additional unique comments submitted by individuals are presented after each form letter with responses to these individual comments. A list of all individuals who signed the form letter is presented last.[1]

Table 7-1. Form Letters

Form Letter	Number of Signatures
Audubon	32,696
Citizens for a Clean Harbor-1	15
Citizens for a Clean Harbor-2	76
CQRC	1,279
CREDO	2,798
Earth Justice	29,976
Earth Ministry	184
Ecology and Hoquiam Letter	39
Environment WA	8
ForestEthics	167
Friends of the Earth	18,155
FUSE	1,249
CBD	3,370
ICL	75
No Crude Oil	647
Oil Shipping Terminal	61
Oregon Interfaith Power and Light	63
Sierra Club-1	2,939
Sierra Club-2	49
WCV	1,800
WEC	762
WebForm	55
WebForm 2	12

[1] Names are listed exactly as they were submitted.

FL1 Audubon

Comment FL1-1

The findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor show that the risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife could be significant. Similar findings exist for waterway contamination, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings. Due to these numerous and enormous risks, I ask that you reject the Westway and Imperium oil terminal proposals. Grays Harbor is a site of hemispheric importance to birds. Surrounded by six Important Bird Areas, Grays Harbor is host to hundreds of thousands of resident and migrating birds that rely on this Pacific Coast estuary. Several species protected under the Endangered Species Act are likely to be harmed by these projects, including the Marbled Murrelet, Snowy Plover, and Streaked Horned Lark. Recent research by the Washington Department of Fish and Wildlife shows that the Pacific population of the Red Knot uses the North Bay of Grays Harbor almost exclusively as its one refueling site during its long spring migration from Mexico to breeding grounds in Alaska and beyond. One oil spill could have devastating effects on this species' survival. Furthermore, the cumulative release of toxic chemicals and oil leaks is known to have negative effects on endangered salmon and other small fish upon which birds rely. There are better ways to meet our energy needs. Washington State should continue to lead the nation on safe, renewable clean energy solutions and say no to more oil and coal. Building more infrastructure for yesterday's energy would be moving in the wrong direction. I support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.

Response to FL1-1

Refer to the Master Response for Purpose and Focus of the EIS.

Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses potential impacts from construction and routine operation of the proposed action. Increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) and potential consequences (e.g., release of crude oil) are addressed in Chapter 4, *Environmental Health and Safety*. Final EIS Section 4.7, *Impacts on Resources*, clarifies that, while impacts would depend on the circumstances of the incident, the resources described in Chapter 3 could be affected. Final EIS Section 3.5, *Animals,* and Appendix F, *Special-Status Species*, have been revised to include birds of conservation concern that could occur in the study area, including the red knot. However, it should be noted that listing as a bird of conservation concern does not necessarily mean the species warrants consideration for being listed under the Endangered Species Act.

Draft EIS Chapter 4 presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on*

Resources, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on natural, cultural, and tribal resources, including sensitive animal species.

Table 7-2. Unique Comments Associated with Audubon Form Letter

Commenter Name	Comment
Abbruzzese, Michael	Please read: As a proud supporter of the Audubon society, I implore you to reject this proposal.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Adams, Robert	As a citizen concerned about our environment, and as a birdlover who recently enjoyed birding in the Pacific Northwest, I am concerned about the environmental dangers of plans for major oil terminals in Grays Harbor, and urge that the plans not be approved. I am especially concerned about the impact of possible and all too likely oil spills on the Pacific Population of the Red Knot, a beautiful species that has already lost a lot of its Atlantic population due to degradation of its main feeding sites on its spring migration route on the Atlantic Coast of North America; it would be a tragedy for that loss to repeated on the Pacific coast, where Grays Harbor is the single most important site.
Response: See Response to FL1-1 above.	
Addison, David	The complete protection of Grays Harbor, its marine life, and its people is very important to us all.
Response: Comment acknowledged.	
Adelson, Julie	I cannot stand that the people in power are so dumb and dangerous to the rest of the life on this planet. What about toxic oil don't you understand?! I support the protection of Grays Harbor, its marine life, and its people, and demand that you to REJECT the proposed Westway and Imperium oil terminals.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Alexander, Judith	To truly illustrate the point, take time to watch the new movie just out by Naomi Klein, This Changes Everything. It is high time we value life over the continued greed of the fossil fuel industrial champions. Please listen to the voice of the people at the grass roots level.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Alexander, Charles	As we transition to renewable energy, we can not afford to endanger one of the worlds most important ecosystems. It is not a wise move to export carbon and endanger the many birds of this region.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Alexander, Lisa	RED KNOTS ARE ALREADY SUFFERING DUE TO LOSS OF FEEDING AREAS AROUND CHESAPEAKE BAT!!
Response: See Response to FL1-1.	
Allen, Deborah	PLEASE be proactive BEFORE a problem arises. Thanks for listening.
Response: Comment acknowledged.	
Allison, Meridith	Please--we have enough fossil fuel sources, and I want to have more renewable resources.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Alphin, Carol	I was born and raised in Washington state, I still visit there often, as all of my family live in Washington. Unfortunately, much of our country's resources are being shipped to China, at a very high price to our citizens, ecology and to our land, in general. My concerns are two-fold: why are most of our resources fueling China and, just important, why is Washington state allowing the fragile environment of your beautiful state to be "USED"? Doesn't anyone have the courage to say NO? Start using more solar energy.....Have you forgotten that Washington state has a desert?
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Alter, Susan	We are not alone on this planet Earth. we need to address all aspects of our lives that are affecting climate change, and fast to maintain life on Earth. Human population control is a huge issue and should be addressed considering all the children that are not cared for on the streets using drugs.

	etc.. We are a part of a 'Web of Life' all have a right to life. (Which species will we destroy that costs the life of all of us
Response: Comment acknowledged.	
Amos, Jerry	The U.S. has plenty of oil without drilling in Gray's Harbor. Stop this unnecessary environmental damage.
Response: Comment acknowledged.	
Amundson, Beret	This must not happen.
Response: Comment acknowledged.	
Ander, Pat	I'm from Washington state and I find this appalling.
Response: Comment acknowledged.	
Anderson, Valerie	Hello. I am sending this note to urge you to please reject the proposed Westway and Imperium oil terminals. I live in Olympia and, like you I'm sure, I deeply treasure our beautiful state and its marvelous natural beauty. The proposed oil terminals threaten the health and future of delicate ecosystems upon which so many species depend, including us. The following comments highlight key points more eloquently than can I, but please consider how truly devastating the proposed terminals would be to us, our environment and our future. We can do better. Thank you.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Anonymous	Grays Harbor is a site of hemispheric importance to birds. Surrounded by six Important Bird Areas, Grays Harbor is host to hundreds of thousands of resident and migrating birds that rely on this Pacific Coast estuary. Several species protected under the Endangered Species Act are likely to be harmed by these projects, including the Marbled Murrelet, Snowy Plover, and Streaked Horned Lark. Recent research by the Washington Department of Fish and Wildlife shows that the Pacific population of the Red Knot uses the North Bay of Grays Harbor almost exclusively as its one refueling site during its long spring migration from Mexico to breeding grounds in Alaska and beyond. One oil spill could have devastating effects on this species' survival. Furthermore, the cumulative release of toxic chemicals and oil leaks is known to have negative effects on endangered salmon and other small fish upon which birds rely.
Response: See Response to FL1-1.	
Anthony, Paul RW	We need to spend more time and energy developing alternate sources of energy and not digging up oil in sensitive places. Energy Efficiency not Energy Greed!
Response: Comment acknowledged.	
Argani,Sholey	Mindful of the untold risks, I ask that you reject the Westway and Imperium oil terminal proposals.
Response: Comment acknowledged.	
Arizona, Liz	Renewable is the way forward! Thank you
Response: Comment acknowledged.	
Armbruster, Jay	You think the oil industry will self regulate and keep things clean, but it's poison and they NEVER self regulate.
Response: Comment acknowledged.	
Armer, Joan/Paul	Please consider our futures, not wallets!
Response: Comment acknowledged.	
Arnett, James and Linda	The findings in the DEISs for Westway and Imperium oil terminal proposals in Gray's Harbor show that the risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife could be significant. Washington state should continue to lead the nation on safe, renewable clean energy solutions and say "No" to more oil and coal.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Arntz, Deirdre	These birds cannot be replaced. Consider the Ivory-billed Woodpecker and the Passenger Pigeon. The latter was the most plentiful bird in the world. There were millions and millions. In a very short period of time they were pushed to extinction. Gone, totally gone. Disappearing habitat, disease etc. We are in the dying days of the Petroleum Age. Lets not lose our shorebirds for a short-lived dirty and dangerous source of energy. This oil is not a necessity and will benefit a limited number of people those that own the companies that produce it in Canada and North Dakota. These companies

	will scream jobs, jobs. The number of permanent jobs will be minuscule compared to the massive destruction of our air and water. Check the numbers very carefully. The reality is most often a small percent of what is promised. Climate change is real. Stop now while we have the chance.
Response: Comment acknowledged.	
Artemis, Diana	Located on Washington's outer coast, Grays Harbor is a critical spring migration stop-over site for Red Knots in the Pacific Flyway. A climate-endangered bird, the Red Knot uses the North Bay of Grays Harbor almost exclusively during the month of May to feed on rich marine food sources before flying non-stop to northwestern Alaska and Wrangel Island, Russia to nest and raise their young. One oil spill or accident could wipe out a significant portion of the Red Knot population in the Pacific Flyway.
Response: See Response to FL1-1.	
Asmus, Sigrid	The findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor, and the blunt negative statements by its emergency personnel, show that the risks of increasing oil-by-rail through the Grays Harbor area are absolutely not acceptable. Damage caused by oil spills -- much less explosions -- presents a massive threat to this area, destruction that it is clear cannot be fully mitigated, just as the environmental damage to marine habitat and wildlife would be life-threatening and could well be significant and permanent. Similar findings exist for waterway contamination, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings -- not to mention tha fact that oil trains often bisect small communities, and typically travel very close by schools, health facilities, and the crucially important offices of fire and other emergeny personnel. Westway and Imperium -- and BNSF -- want to take massive profits out of Washington, while shrugging off any and all responsibility for roadbed safety, accident mitigation, and costs of cleanup and repair onto some of Washington State's smallest communities. The lure of "jobs" is a false one; we must invest in sustainable energy, not pour more carbon into the atmosphere from which it can never be removed. I write to you from the BNSF Blast Zone just north of Seattle, where noise and diesel pollution are almost constant, because if Gray's Harbor fails to reject the Westway and Imperium proposals we will see even more 1.5 mile long oil trains here, where BNSF's vulnerable rail lines -- after crossing the whole state -- travel under the whole west side of downtown Seattle. Due to these numerous and enormous statewide and Grays Harbor area risks, I ask that you reject the Westway and Imperium oil terminal proposals. There are better ways to create jobs while meeting our energy needs. It is unacceptable to devote funds to build more infrastructure for yesterday's unaccountable private energy corporations.
Response: Refer to the Master Responses for Purpose and Focus of the EIS, Geographic Scope of the EIS, Emergency Response and Planning Gaps Evaluation, and Economics, Social Policy, and Cost-Benefit Analyses.	
Aughenbaugh, Kel	Thank you for helping keep this living space free of harsh pollutants that harm life. Peace to you.
Response: Comment acknowledged.	
Auris, Jean	This is not a good progress, but a disaster to happen.
Response: Comment acknowledged.	
Avery, Sonia	I respectfully urge you to reject the Westway and Imperium oil terminal proposals in Grays Harbor, one of Washington's most beautiful and ecologically important areas. These terminals pose a catastrophic threat to this area.
Response: Comment acknowledged.	
Ayala, Judith	Dear Washington Department of Ecology and City of Hoquiam: I hope you understand the urgency of action that is needed.
Response: Comment acknowledged.	
B, Joyce	We will never get off oil if we do not start saying *NO*!!!!
Response: Comment acknowledged.	
Bailey, Brenda	I urge you to reconsider allowing this type of terminal as tragic results could certainly happen. My Mother lived until her death in Grays Harbor. You have to take care of this special location.
Response: Comment acknowledged.	
Baily, Ingrid	I am very concerned about the proposed oil terminals in Grays Harbor. It will make a big difference far beyond Washington State. The more we learn about ecology on our planet, the more we know the health of humans and wildlife is interconnected. Thank you very much.

Response: Comment acknowledged.	
Baker, Jolly Sue	I understand how serious a threat to our State these terminals pose and I beg you to stop them immediately. I am a democrat and have voted in every election since 1958.
Response: Comment acknowledged.	
Balbachevsky, Elizabeth	Dear sr: You have in your hand the future of a global heritage that don't belong only to you or to the United States. It is an heritage for the entire planet, that is why I take the step to adress you on this subject. I fell it is my duty and also my right to speak for those that cannot speak and to stand to help to save this treasure that don't belong yo you. You are guardian of it, and it is not your right to spoil. It is your hand to save this rich environment for the future generations. .
Response: Comment acknowledged.	
Baldwin, Valerie	Please do not build oil terminals near areas where birds congregate. Its just a matter of time before disaster no matter how well intentioned the building.
Response: Comment acknowledged.	
Ball, Connie	Remember when Slade Gorton was senator and complaining about loggers losing job? Well, they'd cut down every available tree in site and would have continued to cut every tree in the State without restrictions. Now the issue is coal. It's a losing proposition for the entire world. Coal companies have to adapt to clean energy or go bust. Delaying that by allowing a filthy industry to contaminate Washington waters will never be right.
Response: Comment acknowledged.	
Balogh, Kathy	Please reject the the Westway and Imperium oil terminal proposals.
Response: Comment acknowledged.	
Balough, Patrick	Stop destroying my planet.
Response: Comment acknowledged.	
Barber, Viginia	I spent my honeymoon along the coast at of Washington State. I have hiked in the Cascade range. What a spectacular stare! However, in good conscience, I will not visit again if the state allows expansion of its crude oil exporting facilities.
Response: Comment acknowledged.	
Bar-El, Pamela	So, if not for the birds, the fish and other sea life, if not for the deer,elk and other creatures native to the harbor, consider rejecting these oil trains and toxic refineries for the health of the citizens of Grays Harbor. Even without a spill or leak into the waters here, there is nothing healthy in breathing the pollutants created by the refining of crude oil- nothing healthy for man, beast or fowl. I know this because I once lived downwind from such a refinery and suffered from severe chronic bronchitis for years until I moved out of the area. To add one more negative impact to an already struggling population is unconscionable. Please, for the sake of the birds, fish, animals and people, reject the oil trains and refineries; their cost is much too high for the benefits they would provide. Sincerely, Pamela Bar-El
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Barre, Mandy	The risk versus benefit simply doesn't pencil out! als.
Response: Comment acknowledged.	
Barrett, Joan	ONE OIL SPILL IN GRAYS HARBOR WOULD WREAK HAVOC WITH THE RED KNOT POPULATION. YOU HAVE THE POWER AND AUTHORITY TO WORK IN FAVOR OF - NOT AGAINST - THEIR SURVIVAL. DO NOT ALLOW THE OIL TERMINALS TO BE BUILT IN GRAYS HARBOR. REJECT THEM. PLEASE.
Response: Comment acknowledged. See Response to FL1-1.	
Barrett, Katharine	Please reject the Westway and Imperium oil terminal proposals!
Response: Comment acknowledged.	
Barringer, Debra	I was monitoring endangered birds in Ventura County, CA when the oil spill happened this spring. It is a devastating event for the local habitats and will linger for years.
Response: Comment acknowledged.	

Basile, Catherine	Once a critical habitat is destroyed, the effects go way beyond just that one habitat. It's loss puts stress on other habitats to accommodate those birds and other migratory species displaced by a home habitat destruction.
Response: Comment acknowledged.	
Bates, June	Our birds and marine animals need clean waterways.
Response: Comment acknowledged.	
Beall, Wendy	The Westway and Imperium oil terminal proposals post too much potential risk for the Grays Harbor ecosystem. Big oil is in decline and more sustainable technologies are on the rise. There is no need to continue to support oil in Washington. It's time to recognize that sustainable energy sources are the wave of the future--a future that is here now.
Response: Comment acknowledged.	
Beardsley, William	Alaska did not reject them, much to their dismay.
Response: Comment acknowledged.	
Beattue, Jane	Oil spills cannot be fully mitigated and the resulting damage to marine habitat and wildlife will be significant. On the menu along with oil-by-raill: train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings. Please reject the Westway and Imperium oil terminal proposals. For starters, Grays Harbor is a site of hemispheric importance to birds. There are better ways to meet our energy needs. Please protect Grays Harbor, its marine life, and its people, and reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged. Refer to the Master Responses for Purpose and Focus of the EIS.	
Beauchamp, James	We don't want another British-Petroleum-type oil spill, which was a disaster for sealife and birdlife in Gulf of Mexico.
Response: Comment acknowledged.	
Bell, James	I am writing the Washington department of ecology and the city of Hoquiam asking them to reject the three new proposed oil terminals .These new oil terminals would be toxic to many migrating birds that stop to rest and refuel on their Pacific flight.Migrating Birds such as the Red Knot uses the north bay of Grays Harbor almost exclusively to feed on marine food sources before flying nonstop to Alaska and Wrangle Island Russia to nest and raise their young. One oil spill could wipe out a significant portion of the Red Knot population in the Pacific flyway.Building these new terminals would also pose a threat to the environment.Oil extractions, transport and export all contribute to greenhouse gas emissions responsible for global warming.once again I am urging the Department of Ecology and the city of Hoquiam to reject the three new proposed oil terminals.
Response: See Response to FL1-1.	
Bell-Kaul, Joan	Due to these numerous and enormous risks, you need to save several species of wildlife from extinction AND REJECT the Westway and Imperium oil terminal proposals. Grays Harbor is a site of hemispheric importance to birds.
Response: Comment acknowledged.	
Bender, Kae	Oil terminals are just a spill waiting to happen. Wildlife, the environment, and all of humanity are at risk if we expand fossil fuel production and consumption.
Response: Comment acknowledged.	
Bennett, Bryan	The geological record of natural history shows 5 great mass extinctions in earth's 4.5 billion years. When huge numbers of species become extinct, the biological role that they perform in maintaining any ecosystem is compromised and therefore the health of the ecosystem itself is compromised. These ecosystems throughout our planet are our life support system, as well as that of all other aquatic and terrestrial species. When the health of these ecosystems is compromised, our ability to survive on this planet effectively is also compromised. Many biologists are saying that we are presently living in the sixth great mass extinction because biodiversity on the earth is disappearing at a rate that is much faster than the natural rate (estimated to be about 1000 times faster than the natural rate). This is mostly due to human activity (such as human development of natural environments resulting in the loss of habitats for many wildlife species and therefore the loss of many of those species).
Response: Comment acknowledged.	

Benson, Carol	We must stop killing beautiful things which guarantee our own continuance!!
Response: Comment acknowledged.	
Berteaux, Elizabeth	We do not need another oil spill anywhere but Grays Harbor is a really special place that deserves our protection.
Response: Comment acknowledged.	
Bhajaria, Nishant	We should be better than risking the lives of birds for to continue our addiction to oil. The federal and state governments have shows themselves to be incapable of handling oil spills as well.
Response: Comment acknowledged.	
Bicknell, Mary	In addition to the facts above, the possibility of a huge earthquake and tsunami are very real. The experience of the Japanese tsunami should be a warning of what are the results of such events--devastation on an unprecedented scale.
Response: Comment acknowledged.	
Biglow, Anne	Please Consider This Information!!!
Response: Comment acknowledged.	
Bilwin, Gina	STOP THE OIL. CLEAN ENERGY YESTERDAY. OIL TERMINALS ARE TERMINAL DISASTERS.
Response: Comment acknowledged.	
Birdsong, Pat	"Oil" has taken on a sacred and untouchable aura in our culture. It is neither and has truly bad consequences in the real world.
Response: Comment acknowledged.	
Blackstone, Lyn	Change your direction and put nature before money.
Response: Comment acknowledged.	
Blain, Susan	Additionally, fossil fuel use must be on the way out if the earth is to continue to be habitable. How absurd it would be to put enormous resources into a project that would contribute immensely to intensifying climate change.
Response: Comment acknowledged.	
Blair, Diana	Let's not take a chance of an oil spill. The red knot needs all the help it can get. Reject Westway & Imperium oil terminals.
Response: Comment acknowledged.	
Blowers, Anne	The findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor and similar findings for waterway contamination, train accidents, air pollution, noise, harmful impacts on tribes and vehicle delay at railroad crossings show that the risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife could be significant. Recent research by the Washington Department of Fish and Wildlife shows that the Pacific Red Knot uses the North Bay of Grays Harbor almost exclusively as its one refueling site, and one oil spill could have devastating effects on this species' survival. Also, accumulations of toxic chemicals and oil leaks have negative effects on endangered salmon and other small fish that birds eat.
Response: See Response to FL1-1.	
Blum, Cheryl	The constant backwards trend in Congress to eliminate protections of our natural world along with weak support of research and development in alternate sources of energy is going to result in the devastation of wildlife, waterways, and forests. Food sources will also become scarce. Future generations deserve to be able to enjoy what we have today, and it is our responsibility to act consistently and effectively to protect it.
Response: Comment acknowledged.	
Bodman, Amy	P.S. I am an American citizen living in Ontario, Canada. I have used my sister's American address as this website won't recognize mine for some reason.
Response: Comment acknowledged.	
Boles, Margaret	Surely we can get companies to focus on safer, more sustainable energy development, if that is what we truly want to keep a healthy planet.
Response: Comment acknowledged.	
Bolognini, Francesca	IT SEEMS LIKE A DAILY THING, THIS NEED TO TAKE ACTION BECAUSE OF THE DEMISE OF YET ANOTHER SPECIES. WHEN WILL WE LEARN? IT IS NOT AS IF THERE WERE NO OTHER WAYS TO

	KEEP THE LIGHTS ON OR RUN OUR CARS. WE DO NOT NEED THESE POLLUTERS, OR THE NUCLEAR DISASTERS IN THE MAKING, WE NEED TO MAKE THE TRANSITION NOW. WE NEED TO LEAVE A WORLD WORTH HAVING FOR OUR CHILDREN AND THE COUNTLESS GENERATIONS THAT COULD POTENTIALLY FOLLOM. YOUR PRIMARY DUTY IS TO PROTECT THE PEOPLE AND THE ENVIRONMENT UPON WHICH ALL LIFE DEPENDS. THAT DOES NOT INCLUDE PANDERING TO THE FINANCIAL INTERESTS OF GREEDY, UNFORSIGHTFUL AND SOCIOPATHIC CORPORATIONS. DO YOUR JOB.
Response: Comment acknowledged.	
Bonilla, Haydee	My children and I are very concerned for these beautiful birds. Please help to save the Red Knot population.
Response: See Response to FL1-1.	
Bonnaffon, Heidi	While I live across the country, the shorebirds need protected habitats (safe harbors) nationally, as climate change and habitat loss are threatening the continuation of certain bird species.
Response: Comment acknowledged.	
Bottesch, Marla	Once a specie disappears, that's it. Never again. No more. We can always find other ways to deliver energy. It might be a little more expensive, but we will be conserving the creatures of this earth for our children and their children. It is a moral imperative to do this.
Response: Comment acknowledged.	
Bourgeois, Paula	I repeat the above sentence.....and hope you are listening with both ears....
Response: Comment acknowledged.	
Bowen, Dane	First, It's just insane to drill for more oil anywhere. There is already enough oil. We need to promote renewable energy instead. Drilling for more oil will only kill off the planet faster. And that's insane.
Response: Comment acknowledged.	
Bowland, Denise	Please reject them for the sake of the birds!!!!! THANK YOU!!!!
Response: Comment acknowledged.	
Boyer, Jayne	Humankind has not woven the web of life. We are but one thread within it. Whatever we do to the web, we do to ourselves. All things are bound together. All things connect. ~Chief Seattle, 1855
Response: Comment acknowledged.	
Bradsher, Whitney-Bear	We need to make renewable energy sources the major focus by the US, for the sake of the global environment. And, it must come from demands by the people in every part of the country, i e. Grays Harbor, WA is no place for further offshore oil drilling.
Response: Comment acknowledged.	
Brandt, Cathy	When I was a child we spent some of our summers at Ocean Shores and it's lovely in that whole area. There has already been degradation in the area, such as over harvesting of razor clams, etc. Please do not allow this to happen When I was a child/teen we spent many of our summers at Ocean Shores, and that entire area is lovely. There has already been degradation in the area, such as over harvesting of razor clams. I've also been personally involved in birding in the area, and have worked professionally as a Wildlife Biologist Tech. (I received my D.O. Ecology training in Marbled Murrelet surveys in the area.) Please do all you can to prevent the plans proposed here. Thanks!
Response: Comment acknowledged.	
Bremer, John	Thank you for the opportunity to comment on this important issue. Well, here we are in 2015 wasting our time putting down another insane proposal from the moribund fossil fuel industry. Yes, of course, we know the oil company officers and directors siphon billions out of their obsolescent operations that enable them to pay for advertising, travel and other campaign expenses for our elected officials. That hardly seems a reasonable basis to cooperate in the looting of our natural capital and the destruction of the birthright of Washington children to a livable environment free from the heat blasting our land and ocean. There is not time to waste making up for the delays caused by the continuous lying funded by Exxon and other oil company officers and directors.
Response: Comment acknowledged.	
Brenner, Lise	As a native of the Pacific NW, I am greatly disturbed by the findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor.

Response: Comment acknowledged.	
Brooks, David	Why are we shipping oil to China, anyway. If this is Canadian oil let them build a terminal up there.
Response: Comment acknowledged.	
Brooks, Tyler	Please, why do we need more oil in exchange for the lives and families of hundreds if not thousands of birds and other coastal creatures. As a teenager, my opinion has yet to affect anything important, in my life or otherwise. Whoever receives this, please Google Red Knots, or Black Skimmers, or a Herring Gull nestling. All beautiful, all at risk. Please make my day, my year, by stating how important this is to a depressed teenager in Pennsylvania who has one thing going for him: birds. Beautiful birds. Thank You for at least taking the time to read over my opinion, whether you are a secretary or the Head Honcho himself/herself.
Response: See Response to FL1-1.	
Brown, Gary	The natural world is losing its footing more and more, with each passing day. Humans have a responsibility to the planet, as a whole, to do whatever we can whenever we can to minimize these losses.
Response: Comment acknowledged.	
Brown, Bets	I've visited Grays Harbor to see the splendid birds that use the habitat.
Response: Comment acknowledged.	
Brown, Kevin	We need to keep our energy in North America AND find alternativenon-carbon energy sources. This does neither, while endangering our coast and promoting global warming.
Response: Comment acknowledged.	
Browne, Nancy	All wildlife - in the sea, on land, and the birds migrating - need help due to destruction of land, vegetation, and the very air we all breathe.
Response: Comment acknowledged.	
Browning-Gough, Susan	The following letter should let you know how us "birders" FEEL ABOUT YOUR PROPOSAL. jUST SO YOU CAN SEND OIL TO CHINA. wHAT A CROCK, FIND ANOTHER PLACE FOR YOUR OIL TERMIMAL.S
Response: See Response to FL1-1.	
Buoncora, Yvonne	Grays Harbor must be protected!!
Response: Comment acknowledged.	
Burkinshaw, Tim	COME ON!!!!! How many Oil Spills is it gonna take before You Oil Co's: wake up????????
Response: Comment acknowledged.	
Burnstin, Judy	At a time when the emphasis is on finding and using alternative energy, it is not a time to sacrifice the rich shoreline habitat to oil development. If you are thinking of the future, please think of your children and grandchildren, and preserve the wonderful migration of shorebirds that come to your area. Fuel sources will change, but extinction and ruined habitat cannot be reversed. Act locally and responsibly for all of us!
Response: Comment acknowledged.	
Burroughs, Karen	It's just not worth the risk here. We know spills happen. Often. And when they do, it's almost impossible to clean them up quickly.
Response: Comment acknowledged.	
Bush, Joan	Your consideration in this matter will be very much appreciated. Thank you.
Response: Comment acknowledged.	
Buttles, Kate	You already have threatened salmon which is absolutely essential for your State, for your animals, for people who live off of them.
Response: Comment acknowledged.	
Byington, Ruth	Once we destroy breeding grounds, we will never be able to replace them.
Response: Comment acknowledged.	
Bykonen, Joan	How can you even think of poisoning the habitat of these beautiful birds?
Response: Comment acknowledged.	

Byron, Doug	Building more infrastructure for yesterday's energy would be moving SIGNIFICANTLY in the wrong direction.
Response: Comment acknowledged.	
Cahill, Greg	Do you really want to leave a degraded environment to your children and grandchildren? Think they'll remember you fondly, or with embarrassment? Reject these too dangerous terminals which will be a blot on the land and water for generations.
Response: Comment acknowledged.	
Cain, Barbara	HELP! I IMPLORE you to reject the Westway and Imperium oil terminal proposals!!!! Don't give in to the greedy oil industry!
Response: Comment acknowledged.	
Camero, Helene	It shocks me that a progressive state like Washington would accept anything as perilous as a crude oil teminal in one of their top wildlife harbor. I hope your smarter than a willing puppet giving in to big oil.
Response: Comment acknowledged.	
Canalizo, Dorian	It seems our government is intent on destroying our environment and wildlife.
Response: Comment acknowledged.	
Cannon, Thomas	We do NOT need to be building more of these horribly dirty, foul, and poisonous facilities, especially not in places like this. I support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Canonica, Charlene	We must protect all marine wildlife as it will effect us as humans. This is just another example of the 1% wanting to kill off more of the99% This does not make that many permanent jobs and there is absolutely no reason to add more oil terminals. It will only help the greedy 1%.
Response: Comment acknowledged.	
Canyonrivers, Pamela	Oil and other fossil fuels are passe, so why put are precious birds and wildlife and other endangered species at risk like this? We need to ramp up our transition to renewable energy and other sustainable practices. Creating more oil terminals is stupid and a tactic that is going in the wrong direction that will take us BACK in time. Your priorities are out of synch with the times and just plain foolish and wrong. And I do NOT support them.
Response: Comment acknowledged.	
Cardwell, Paul	The destruction of critical habitat by polluting industries must end.
Response: Comment acknowledged.	
Carl, Juanita L.	Please protect our birds!!
Response: Comment acknowledged.	
Carlill, Neil	Strive to conserve our environment for future generations.
Response: Comment acknowledged.	
Carr, Patrick	I traveled to the Hoquiam area this past August and was taken by the tremendous natural beauty and wildlife resources of the area. It is my hope that you will protect those qualities in considering permitting petrochemical development as proposed .
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Carroll, Bill	The lack of the possibility of full mitigation of oil spills in Grays harbor and the significant damage to the marine environment there make the rejection of terminal proposals there imperative.
Response: Refer to the Master Response for Mitigation Framework.	
Carroll, Linda	As an America who is informed and concerned about environmental and health issues, I know that the findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor show that the risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife could be significant. Please put the environment and the health of Washington and its citizens first.
Response: Refer to the Master Responses for Purpose and Focus of the EIS and Mitigation Framework.	
Carson, Nancy	Are you crazy? Why risk you pristine environment for a dying industry?

Response: Comment acknowledged.	
Casey, Claire	WHY ARE WE WORRYING ABOUT THIS BECAUSE BIG OIL AND GAS AND BIG $$$$$ ALWAYS WINS.. THEY DO NOT CARE ABOUT PEOPLE OR ANIMALS .... THEY JUST WANT TO MAKE $$$ BY SELLING THIS CRAP TO CHINA TO CREATE FURTHER POLLUTION. GOOD LUCK , I WISH YOU WELL BUT I THINK WHITE MAN WILL KILL THE EARTH.
Response: Comment acknowledged.	
Casper, Chris	The oil industry is destroying our earth! From the time it's extracted to it's use as a fuel, it harms us in every way possible. We must be smarter, we must end use of oil as a energy source. We know better than we did 100 years ago & we'v been told to stop since 1970's how harmful is. Don't you think it's time to listen? I do.
Response: Comment acknowledged.	
Castiano, Judith	I am HEARTILY SICK AND TIRED of Big Oil and their GREEDY goals of expansion at the expense of the lives of those nonhumans who CANNOT SPEAK FOR THEMSELVES! This particular bird species HAS A RIGHT TO LIVE. The hell with the bottom line for oil companies, we need to reexamine the moral priorities of how lives matter MORE THAN GREEDY PROFIT!!!!
Response: Comment acknowledged.	
Castillo, Theresa	Please protect our environment for all.
Response: Comment acknowledged.	
Catherine, John	IS THERE NO LIMIT TO THE RAPACIOUS GREED OF OIL COMPANIES? WE MUST and CAN EXTRICATE OURSELVES FROM Co2 FUELS ESPECIALLY WHEN SOLAR ENERGY IS BECOMING INCREASINGLY AVAILABLE!
Response: Comment acknowledged.	
Cebula, Alison	I currently work for a state agency as an avian field biologist. Many shorebird populations, including the Red Knot, are in serious decline. Millions of shorebirds depend on a patchwork of remnant wetlands, marshes, and shorelines during migration each year. It is crucial that we protect what little remains in order to conserve these species of birds.
Response: See Response to FL1-1.	
Chapman, James	As someone who grew up in Seattle and loves the ocean and its environment, I support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Cheek, Deborah	Corporate profits cannot be more important than the protection and preservation of our natural world! This area is such a hugely important environmental area that it is simply mind boggling to me that anyone could even propose putting oil terminals in Grays Harbor. Please do the right thing and deny the proposals of Westway and Imperium. Thank you for considering my input on this extremely important issue.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Chrissos, H.L. Chris	NOW IS NOT THE TIME (IF EVER) FOR THE US TO BE EXPORTING OIL OR GAS. WHEN ALL THE DOLLARS ARE GONE SO WILL OUR ENVIRONMENT BE. I VISITED CAPE MAY, NJ, SOME YEARS AGO AND WAS DELIGHTED WITH THE NUMBER OF RED KNOTS AND OTHER SHORE BIRDS THAT STOPPED OVER ON THEIR MIGRATION. RECENTLY, BECAUSE OF MAN'S MISMANAGEMENT AND MISPLACED VALUES, THE POPULATIONS HAD PLUMMETED. IT IS FOR US, THE PRESENT GENERATION, TO LEAVE FOR THE NEXT, THE BEST WE POSSIBLY CAN. GREEN PAPER WITH NUMBERS AND PICTURES IS WORTH LITTLE. A WORLD FILLED WITH BEAUTY AND VARIETY IS WORTH EVERYTHING.
Response: Comment acknowledged.	
Christ, M'Lou	The DEIS shows why this request must be denied: The findings in the DEISs for Westway and Imperium oil terminal proposals ……
Response: Comment acknowledged.	
Christian, Linda	You have the opportunity to be stewards of the pristine nature that has survived in your backyard. I beg you to save this critical spot for migrating birds and for all of us
Response: Comment acknowledged.	

Christiansen, Claudia	Oil, ruining our shores, our birds, our marine wildlife, OUR land n seas.....to export to China? We have gone greedy mad in these once great lands of America. When the people of American find out about this plan to EXPORT our oil whilst paying for IMPORTED oil, they'd be quite upset.
Response: Comment acknowledged.	
Christianson, Greg	From what I have observed anytime oil is in the environment it spreads around. Humans do not have a good record on containing petroleum.
Response: Comment acknowledged.	
Chrzanowski, Lynne	SOLAR Stop anything involving filthy, poisonous oil. It's the 21st Century. Get with it. NO MORE horrible oil.
Response: Comment acknowledged.	
CILIONE VetPATRIOT, BRUNO F.	***Any mistake here is a Disaster!!
Response: Comment acknowledged.	
Clagett, Ione	My extended family and I have been happy to spend our vacation dollars in the Hoquiam, Aberdeen, Bowerman Basin, Ocean Shores area for many years. The birding is often spectacular and the quiet beach walks give us time to appreciate the nature around us. Any kind of oil spill disaster could change this for the rest of my lifetime. Please increase your motel and restaurant taxes, charge more for an ice cream cone, most of all remember your paying visitors, before you risk losing the reason why we visit: the birds and the beaches.
Response: See Response to FL1-1.	
Clark, Lucy	I am a resident of Kern Co, CA, which produces the majority of oil coming from this state. Do your residents and wildlife a mammoth favor, and do not allow the oil industry access to your city. Our environment, air, water, our safety, have all been harmed by this industry, which feels entitled to do as they wish within our county. The harm done is irreparable.
Response: Comment acknowledged.	
Clarke, Barbara	Please, don't let us become another statistic like Alaska and the Gulf Coast. Grays Harbor could not recover from oil spills because it is an enclosed estuary. Oil cannot be removed from the sand and an oil spill would be an ecological disaster,
Response: Comment acknowledged.	
Cleland, Patricia	We do not need more oil development or threats to wildlife from the oil industry. Oil prices are at an all-time low. Let's protect the wildlife - we are killing it at an alarming rate!
Response: Comment acknowledged.	
Cody, Jeff	Oil is passé. As far as oil is concerned we're at a point where the law of diminishing returns has begun to make it no longer viable as a source of energy.
Response: Comment acknowledged.	
Cohen, Karla	It's long past time for humans to start sharing the planet. We living with millions of other species, so perhaps we should stop acting as if we're the only one. Our greed and overconsumption are having dire consequences for non-human animals and the Earth itself. Perhaps we should evolve and start living by higher ideals than money and convenience.
Response: Comment acknowledged.	
Colby, Candace	We face challenging environmental problems and must not ruin the more pristine areas we have left. This is important not only for the other creatures that share this planet, but for the human spirit as well. We need wild places for our own spiritual health.
Response: Comment acknowledged.	
Cole, Cal	Save the planet. !!!
Response: Comment acknowledged.	
Coleman, Colleen	PLEASE SAVE THE MARINE LIFE
Response: Comment acknowledged.	
Coleman, Judy	We need to be thinking about survival at this point.
Response: Comment acknowledged.	

Collins, Randall	I am writing today to ask you to please reject the Grays Harbor Westway and Imperium oil terminal proposals. Grays Harbor is a special place on a world scale for birds.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Comella, John	These oil terminals are VERY likely to cause GREAT toxic pollution both in our water and soil. We need to stop the easy road for toxic polluters.
Response: Comment acknowledged.	
Conn, Gerrilynn	Despite all assurances of safety, we continue to hear news of yet another problem relating to oil spills. Please remember we have a responsibility to future generations of humanity for the health of the planet we leave them.
Response: Comment acknowledged.	
Conn, Patrick	Due to these numerous and enormous risks, I DEMAND THAT YOU REJECT the Westway and Imperium oil terminal proposals. Anything less is OBVIOUS COLLUSION WITH "BIG OIL" and IRRESPONSIBLE DENIAL of PUBLIC OPINION and the REGION'S BEST LONG-TERM INTERESTS.
Response: Comment acknowledged.	
Conrow, Bonnie	NO MORE OIL NO MORE COAL MOVE FORWARD TO A CLEANER TOMORROW!
Response: Comment acknowledged.	
Cook, Gary	The Province of British Columbia to your north has turned down a TransCanada proposal to ship that same dirty oil by pipeline through a wilderness area to Canada's West Coast. They would laugh at Washington State's politicians if they allowed this dangerous oil to be shipped from an American port to a nation that has sucked away millions of U.S. jobs.
Response: Comment acknowledged.	
Cook, Susan	I lived near Gray's Harbor for about ten years while I was teaching at Huxley College of Environmental Science at WWU. That area is prone to earthquakes and flooding. It is a very important area for wildlife. Putting an oil terminal there is insane. There are cliffs along the railway that are unstable so that many times the railroad is closed. It is a beautiful area and it certainly is not appropriate to put an oil terminal there . That area is also important for tourists ....keep it beautiful!! Susan Cook PhD animal behavior and Toxicology
Response: Refer to the Master Responses for Seismic Risk and Design Requirements and Earthquake Probabilities.	
Coombs, Joyce	I lived and worked in this incredible place and support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Copenhaver, Kenneth	***The eastern population of Red Knots is already in severe decline. A project that could also threaten the western population should not be approved!***
Response: See Response to FL1-1.	
Costello-Kruzich, L	This is important to me!!
Response: Comment acknowledged.	
Covault, Jonnel	Washington and Oregon are being assaulted with proposals for dirty fossil fuel EXPORT projects. This is not about America's energy independence, it is about Profit. Most of the profits from these projects will go to the already mega rich oil companies, who then fund candidates who deny climate science. Coastal communities will incur the most damage and cost from climate catastrophes, rising ocean levels and acidity. Why would you jeopardize the future of your community? Don't aid and abet this dirty, greedy Industry that shows complete disregard for our air, water and our planet while they extract and ship our resources to Asia. Please use your ingenuity to bring clean, renewable energy jobs to our states.
Response: Comment acknowledged.	
Cox, Linda	The age of oil and coal is over. Don't waste our wildlife by supporting out of date technology.
Response: Comment acknowledged.	
Crawford, Helen	There is no way around it. Birds are global citizens AND ambassadors. We need to treat them with full honors of visiting dignitaries!
Response: Comment acknowledged.	

Croddy, Kathleen	The oil industry has proven time and again that they do NOT spend enough of their profits for safety and reliability so veto any encroachment by these dastardly Profiteers into into this area where this wild life goes on.
Response: Comment acknowledged.	
Cross, Dave and Rita	It just is too much of a risk! We think it is the only right decision to make! Thank you kindly!
Response: Comment acknowledged.	
Cuenca, Janet	No more infrastructure for fossil fuels!
Response: Comment acknowledged.	
Cuolahan, Sylvia	Be our hero. Support the protection of Gray's Harbor. We thank you.
Response: Comment acknowledged.	
Curedale, Patrice	I live in Southern California where the recent oil pipeline spill despoiled coastline from Santa Barbara to south of Los Angeles, and threatened the health of swimmers, surfers, and marine life and birds. Don't let Grays Harbor be the next disaster. Please reject the Westway and Imperium oil terminal proposals. There are much, much better ways to meet our energy needs.
Response: Comment acknowledged.	
Cutrofello, Liz	Please give this vital issue your deepest consideration!
Response: Comment acknowledged.	
Cyrus, Jana	I am very much opposed to oil drilling in any ocean!
Response: Comment acknowledged.	
Dalglish, J.D., Ph.D., Thomas K.	I am a former lawyer in Washington State, starting out in the Attorney General's office there many years ago. I lived in Olympia, Tacoma, and then Seattle for many years, and visited the Grays Harbor area (and the Nisqually Delta) many, many times. At one point I was Thurston County Democratic Chairman, and spent time with people from the coastal counties in Washington State. I am now a journalist in Rhode island. The natural haven the Grays Harbor area provides for birds is of global importance, not just to Washingtonians. Its loss, deterioration, or intentional degradation would be irredeemable. Knowing of the damage that will be caused by the proposed terminal, but going ahead anyway, would fit the legal definition of an intentional criminal harming, and be a premeditated criminal act. Is the label -- that of "criminal" -- one that you wish to apply to yourselves? I can't imagine that it is, yet that is one that would be honestly applied. Plenty of criminals do bad things for reasons they believe are justifiable, that aren't. Look around.
Response: Comment acknowledged.	
Daniel, Wayne	Please support protection of Grays Harbor, its wildlife (Marbled Murrelet, Snowy Plover, Streaked Horned Lark), and its people.
Response: Comment acknowledged.	
Dater, Suzanne	You can take action to save threatened wildlife.
Response: Comment acknowledged.	
Dauerty, Barbara	As a gubernatorial supporter and former and (hopefully) future resident of Western Washington, I have a vested interest in the area's economic ecology.
Response: Comment acknowledged.	
Davidoff, Janet	I lived in Washington state for a while and recognize the incredible Gray's Harbor bay should be used and jobs brought to the area since Weyerhaeuser shut their operations down. This will not bring jobs and is an environmental disaster. I am a year from retirement and have plans to sell my home and move to the Aberdeen/Hoquiam area for retirement. Why don't you go for retirees instead? It is good and stable. It sure won't interfere with birds in Washington. I want to retire to Washington's beautiful Pacific Coast, not trudge through petroleum trying to save bird lives. When young I lived in Crescent City CA near oil tanks... there the endless mini spills and they leaked all over the dunes and down to the beaches. It was horrible. A few years ago I lived in Greenville TX when an oil spill poisoned Lake Tawakoni and we had to pay for an emergency line to Lake Ray Hubbard. It was a long time before we could get drinking water through the tap again. I had another spill just over the hill from my beautiful 14 acres. It went straight into Lake Tawakani again. Neither of these spills were in the newspapers locally. They are online.

Response: Comment acknowledged.	
Davis, Carlton	Sirs: Energy independence is essential for a strong America and a strong economy. Don't be discouraged by the tree huggers who imply that these proposed terminals are a choice between big oil and wild life extinction. Is there a potential for an oil spill? Of course there is. I also cannot guarantee that I won't be struck by lightning or an errant meteor. However these are not reasons to hide under my bed or to support actions which compromise the economic strength of the United States. Take due care and do what's right. The birds won't even notice. Trust me . . . Yours truly, Carlton T. Davis 1333 Rolling Hills Drive Howell, MI 48843 ccdavis@peoplepc.com
Response: Comment acknowledged.	
Davis, Jacqueline	I was raised in Grays Harbor County, graduated from Elma High School and Grays Harbor Community College.
Response: Comment acknowledged.	
Davis, Jerry	Our birds are declining 4 % per year and 40% fewer birds cross the Gulf than crossed 10 years ago.
Response: See Response to FL1-1.	
Davis, Paul	You have a wonderful opportunity to preserve a critically important habitat by rejecting the proposed oil terminals. I understand that there are important local economic considerations but ask that you take a broader view when you make your decision. After working in the environmental regulatory field for 35 years, I have seen many instances where attempts to protect resources and mitigate for potential impacts fail to meet the original goals and the environment suffers. The consequences tend to increase with the importance of the habitat and the scale of the project. Thank you for your time.
Response: Refer to the Master Response for the Purpose and Focus of the EIS.	
Davis, S.	IT IS PAST TIME FOR ALL OF US TO STOP TREATING PETROLEUM LIKE A RENEWABLE, BENIGN RESOURCE. IT IS TOXIC, IT IS DISAPPEARING AND WE NEED TO PUT OUR MONEY, TIME AND EFFORTS INTO FINDING, DEVELOPING AND UTILIZING RENEWABLES TO REPLACE IT BEFORE WE ALL FRY IN NO-FREEZE WINTERS
Response: Comment acknowledged.	
Davison, Heidi	It is my strong hope and desire to live in a beautiful world and to do all that is possible to ensure that others do, too, even those who will live long past me. How is it that we continue to destroy the beauty of our planet, its diverse and wondrous habitats, for the sake of short-term gain? Our creator has given us a gift full of wonder and mystery - let's do all we can to appreciate, cherish, and hold onto this precious offering.
Response: Comment acknowledged.	
Day, Joanne	Please reject the Westway and Imperium oil terminal proposals. I have often enjoyed seeing the birds gathered there during their migration.
Response: Comment acknowledged.	
De Vito, Stella	It's a comfort for me that I still remember, and cherish the memories of, the 7.5 years I lived in Washington State with it's clean air, magnificent wildlife and especially the birds. I want to continue to visit there to enjoy these things. Therefore I urge you to take my proposal very seriously.
Response: Comment acknowledged.	
DeAngelis, TC	Building more infrastructure for yesterday's dirty energy is wrongheaded, nonproductive, and dangerous.
Response: Comment acknowledged.	
Debell, Carol	Regrettably we do not need to look at Africa or South America for abominable respect and care for environment, we need to look in our own front and backyards.
Response: Comment acknowledged.	
Dederer, Mary	Protect the birds; don't cave in to the oil companies.
Response: Comment acknowledged.	
Dehler, Patricia	I guess you didn't learn anything from the Gulf oil disaster!.
Response: Comment acknowledged.	
Dejonge, Carolyn	We are currently losing Red Knots on the east coast because of poor management of their environment. And remember - their environment is OUR environment. There are better ways to

	meet our energy needs. We need to make sure that our legacy to our children is NOT - "we should have done more to protect the world we live in" but "We did as much as we could possibly do to protect Your world. Make sure you do the same for your children."
Response: Comment acknowledged.	
Delgiudice, Barbara	Please protect our birds. Thank you.
Response: Comment acknowledged.	
Delin, Donna	Please stop putting energy before conservation. The oil and gas are quickly used up, but the environmental devastation is permanent.
Response: Comment acknowledged.	
Dello Russo, Gina	I understand that you are trying to balance economics with the environment. But at this juncture in our energy future, please consider the following as a personal message from me. I support what is said here and would hope that the Washington Department of Ecology and City of Hoquiam would also consider these risks as too high to allow impact.
Response: Comment acknowledged.	
DeMillion, Frances	We need to find safer ways to develop our energy sources.We must NOT destroy our environment and wildlife to send oil to other countries
Response: Comment acknowledged.	
DeMoor, Mary	PLEASE begin to consider the fragile wildlife that will be affected by your actions!!!!
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Denneen, Bill	As a retired Bio. Prof. the Westway and Imperium oil terminal proposals R WRONG!
Response: Comment acknowledged.	
Dennehy, LJ	Please stop, think and end this madness now!
Response: Comment acknowledged.	
DeRose, Sonja	Please use your influence to protect and preserve our wildlife for now and for future generations!
Response: Comment acknowledged.	
Derringh, Helena	When are we going to protect innocent species from our greedy and unsustainable ways? No wildlife or wilderness area should ever suffer from another of our oil spills. We are the one and only toxic species. We had better address this runaway failing of ours before we finish off the planet definitively -- and the clock sure is ticking. ---
Response: Comment acknowledged.	
Desborough, Laurella	We in the US have the ability to protect our migratory birds and that should include officials in cities and in federal agencies because birds world wide are now at great risk of extinction. Every effort should be made to make decisions that will protect our native wildlife and migratory wildlife.
Response: Comment acknowledged. See response to FL1-1 above.	
Devault, Judy	Please, Please, save and protect our wildlife. Please save our wildlife. Please save the wildlife.
Response: Comment acknowledged.	
Dever, Tim	Sandpiper and other shorebird species are already reclining. We need to help them by refraining from making their migrations even more risky than they already are.
Response: See Response to FL1-1.	
Devine, Patricia	These terminals are a very bad idea and will cause damage to the environment and the animals that live in it.
Response: Comment acknowledged.	
Deyo, Linsi	Wildlife of all sorts is threatened by the proposed plan. Please reject it.
Response: Comment acknowledged.	
Dinsmore, Sharon	As a nation, we must give more attention to the impacts that our actions have on our environment and the creatures we share this world with. It may cost more to implement plans that also protect the environment, but it is a price I'm willing to pay and I think many others are also willing to pay more to preserve our environment. Please consider this carefully.
Response: Comment acknowledged.	

Dionne, Denis	We can no longer tolerate these spills ! I encourage you to do everything possible to prevent future mishaps !
Response: Comment acknowledged.	
Dobronyi, Kathy	When will government stop supporting the destruction of the environment by oil companies? Didn't we learn ANYTHING from the oil disaster in the Gulf of Mexico? "Oil spill" my ass!
Response: Comment acknowledged.	
Domike, Tammy	I am a Hoquiam resident and live in the blast zone. The DEIS shows there is inadequite mitigation and these bird populations cannot be remediated. I'm reading the book, Nestucca now, about the 1988 spill where 56,000 birds were killed. Protect the animals at the National Wildlife Preserve and choose the "no action" option.
Response: Comment acknowledged.	
Dougherty, Kathleen	Why do we seem NOT to get the big picture with this drilling issue???? please lets get better informed and better prepared by finding ways to increase safe alternative energy.
Response: Comment acknowledged.	
Dresser, David	With one thing then another thing we imperil these incredible birds. Horseshoe crabs in Maryland and New Jersey, a variety of shore life in Washington State. Lets halt this slaughter of nature.
Response: Comment acknowledged.	
Dressler, Judi	Please do the right thing for our planet's wildlife and the people who live in Grays harbor. Thank you.
Response: Comment acknowledged.	
Duca, Maria	Washington State can be the beacon of light that we need in the fight for the environment, bio-diversity and climate change in saying "No" to Big Oil.
Response: Comment acknowledged.	
Dunlap, Jim	The degradation of our environment proceeds apace, and it needs to stop. Some sources claim that up to 50 per cent of our wild birds are disappearing. We need to address this issue.
Response: Comment acknowledged.	
Dunn, Sharon	There are other solutions to our energy needs besides continuing the reliance on oil which only harms the environment and makes the oil industry rich. We need to have a long-range vision. Thank you.
Response: Comment acknowledged.	
Dupont, Frances	Imagine flying thousands of miles only to stop in Grays Harbor and get coated with oil.
Response: Comment acknowledged.	
Dupree, Judith	It is not a controversial decision, this Grays Harbor and the oil terminal. There is NOT A SHRED OF EVIDENCE THAT AN OIL TERMINAL WOULD BE BENEFICIAL TO THIS AREA! It is a potential disaster, and no one who cares about the citizens and animal/bird life and habitat would even consider allowing this "invasion." It is a horror in the making!
Response: Comment acknowledged.	
Dura, Michael	I have good reason to ask that you reject the Westway and Imperium oil terminal proposals. Grays Harbor is an important location for the migration of several species of birds, some of them already under the protection of the Endangered Species Act. One species, the Red Knot has only this area as it's resting stop on it's migration between Mexico and Alaska. In other words the only place to see a Red Knot between Mexico and Alaska is in Grays Harbor, itself. Several of the other birds that show up in Grays Harbor during their migration are the Marbled Murrelet, Snowy Plover, and Streaked Horned Lark. These are all birds of great beauty but are on the list of endangered species. One spill or one accident would have a disastrous effect on these species. I have lived near oil terminals of a similar nature to the kind being proposed by Westway and Imperium, and I can tell you that the result of steady leaks of toxins into the atmosphere from such terminals make life unpleasant and difficult not only for animals, but for people. Please reject the proposed Westway and Imperium oil terminals.
Response: See Response to FL1-1.	
Durnell, Susan	Grays Harbor is a shorebird mecca. It would be a travesty to have an oil spill here.

Response: Comment acknowledged.	
Dyche, Danny	With what is now known, a government cannot be legitimate without banning fossil fuels the environment is national security; pollution is treason.
Response: Comment acknowledged.	
Eckel, Carolyn	Oil spills are happening and there is no good way of clean up. too many birds are impacted with spills.
Response: Comment acknowledged.	
Eckersley, Cynthia	This area is also very important to fisherman and the shellfish are phenomenal. An oil spill would be devastating to the economic livelihood of people who rely on income from shellfish and fishing as a way of life. I was born in Aberdeen and grew up in the Hoquim and Grays Harbor area. We spent many summers enjoying the natural beauty of the area while clam digging, fishing and bird watching. To risk destroying an area with such a bountiful environment would be catastrophic if an oil spill occurred.
Response: Comment acknowledged.	
Eckert, Stephanie	Please protect Grays Harbor and its habitat. Please reject these oil terminals. Thank you!
Response: Comment acknowledged.	
Edmiston, Gretchen	Dollars for the few at the expense of whole ecosystems is getting very unpopular. We need to stand up and make decisions that help the most, hurt the least, and stop bowing down to the greed of the ultra wealthy who could care less if they exterminate every species on the planet, so long as they get an extra million dollars out of it.
Response: Comment acknowledged.	
Egan, Maura	We know better. We have learned we can not have any oil spills in environmentally sensitive areas! Grays Harbor is a beautiful and significant area for migratory birds. Safe and renewable energy is our future.
Response: Comment acknowledged.	
Ekhart, Lance	Preserve Gray's Harbor for the Pacific Flyway for birds
Response: Comment acknowledged.	
Eliades, Mary	Enough with the oil and gas. Time for green industry. Good for business, good for workers, good for consumers and very good for the environment.
Response: Comment acknowledged.	
Elleman, Susie	What do you think about someone who lives in filth and squalor? Disgusting, right? That is their home, and they do not take care of it. WE NEED TO START TAKING CARE OF OUR HOME. Please, do not allow a dirty oil operation to share your space.
Response: Comment acknowledged.	
Elliott, Jan	Haven't we learned anything from Exxon Valdez and BP spills?
Response: Comment acknowledged.	
Elliott, Mary	We need to shut down the fossil fuel business, not keep expanding it. Whether it's burned here or in foreign lands, it is destroying the same planet.
Response: Comment acknowledged.	
Elsbach, Bart	The environment is more valuable and important than your catering to interests or those interests profit seeking. Get your priorities straight.
Response: Comment acknowledged.	
Engvall, Brady	I'm reading the DEISs the above paragraph sums it up. The DEIs also are constructed in such a manner as to obfuscate to issues and minimize the dangers and does not follow Washington state SEPA law. Tthe GH estuary is also provides nursery habitat for dungeness crabs, salmon and has a thriving shellfish industry.
Response: Comment acknowledged.	
Epstein, Judy	A bird population is in danger of being wiped out. It is very important that we not allow this to happen. They are the Red Know population in the Pacific flyway.
Response: See Response to FL1-1.	

Erickson, Nancy	Humans have done too much damage to our world and the life lines on it. We need to stop now and at least not incur any new areas where death and destruction would be found by the creatures using it. They were here before we were. Let's hope some will still be there after we are gone.
Response: Comment acknowledged.	
Ewing, Peter	We rely on government to structure the marketplace such that the true cost of extractive industries, including the costs to us all of the environmental impact, are accounted for and covered. The Deep Water Horizon experience shows that catastrophes, while they may be unlikely, are possible. If this type of risky enterprise must be considered, then set aside by industry of funds to deal with such problems should be a requirement of any plan for major new extractive enterprises. A free market approach to assessing the cost would be the premium a major insurance company would charge to cover the risk. An insurance plan, analogous to Workers' Compensation, to which all extractive industries contribute, rated by their demonstrated and potential risk, would be one solution.
Response: Comment acknowledged.	
Faber, Phyllis	Our planet is under too much pressure and doesn't need this. STOP NEW OIL TERMINALS!!!!!!!!
Response: Comment acknowledged.	
Fairless, Judy	Please protect wildlife and the environment.
Response: Comment acknowledged.	
Farley, Gloria	It's time for change. Do the right thing. Money is no motivation for destroying our natural habitat.
Response: Comment acknowledged.	
Farneth, Sally	Does anyone making money from oil care about the permanent damage that could be done to the environment? SWF I support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Ferrari, Angela	Learn for Exxon Valdez, this area has still not recovered from that spill.
Response: Comment acknowledged.	
Finch, Sharon	Please do not let this happen. Thank you!
Response: Comment acknowledged.	
Finkelstein, C. Robert	Governor Inslee, I searched for shorebirds at Grays Harbor a number of years ago and found large numbers of shorebirds there. As noted above an oil spill would be devastating. My personal experience gives me another reason to say that I support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Finnegan, Shawneen	Oil terminals in Grays Harbor is an unbelievably bad idea for many reasons. PLEASE REJECT THIS PROPOSAL First, we need to switch away from using petroleum for climate change purposes. I have been to China and the pollution issues are horrendous. When I was there many years ago it would take three days to get the metallic taste out of my mouth. And from what friends tell me it is so much worse now. Climate change is fueled by our use of petroleum. As a passionate shorebird watcher from Portland, Oregon, I can attest how important Grays Harbor is to the Pacific Flyway. We have very little coastal shorebird habitat here in Oregon and migrating shorebirds stop to fuel up in Grays Harbor and Willapa Bay before flying over Oregon to get to their next stop in Humboldt Bay. It is critical to their survival. They are already suffering badly from climate change and other habitat loss causing their numbers to plummet.
Response: Comment acknowledged.	
Fischer, Audrey	Don't KILL THE BIRDS!
Response: Comment acknowledged.	
Fischoff, Robert	We need to put the health of our environment and ordinary people before the interests of greedy, criminal corporations and their evil, criminal wealthy owners. I ask that you utterly reject the Westway and Imperium oil terminal proposals.
Response: Comment acknowledged.	
Fisher, Julie	Oil, Gas, and Coal industries need to be scaled back, not expanded. Every time oil, gas, and coal are allowed to expand, they want decades of continued extraction to earn profits on the investment, so it is the WRONG way to go. The fossil fuel industry has had 50 years to make the switch to clean, renewable technologies, but, instead, they chose to double down and to even lie to the public about

	the huge risks of global warming that they knew about as far back as 1978. This planet is dying fast, and there is NO time left to waste on catering to the fossil fuel industries who have shown for decades that they do NOT care who they hurt, whether it be people, animals, or even life on this planet. We need to push hard on vastly expanding renewable, clean, and environmentally RESTORATIVE energy policies...and, at the same time, we MUST push the fossil fuel industries onto the endangered species list...soon to go extinct (before life on our planet does).
Response: Comment acknowledged.	
Fisk, Katrina	As a conservation biologist, I make an effort to try to understand the natural world as best I can. It's complicated. Very complicated. But when anyone in the field (or out of it) takes a step back there is one simple, over arcing concept that holds true: the world is a puzzle. You have to have all the pieces to make the picture. Natures puzzle is ever changing: some pieces grow, others shrink, and yes, some do naturally disappear and fade away, but we are losing pieces at an unprecedented rate. Like, there is a three-year-old throwing a tantrum and flinging them everywhere. Ecosystems take time to recover and have to be giving a chance to do so. But you know what's far easier than spending millions of dollars on restoration efforts that, while a noble effort, are still a significant downgrade from natural habitat? Not destroying it in the first place. This puzzle doesn't exist "out there" somewhere, we are right in the middle of it. We rely on the pieces we are connected to and we are connected to all of them. I have a passion for the natural world and yes, I do believe all living things have inherent value. However, I still care more about my children being able to breath clean air, drink clean water, eat food that isn't carcinogenic. These things have emotional, moral, and economic value. You don't have to care about shorebirds. It's okay, not everyone does. But do you care about your children's health? Your health? Preserving this vital shorebird habitat is one of the many essential parts to our puzzle. Preserving it is a small step towards keeping what is left of our natural world functioning, for all of nature, including us. Below is a more detailed and specific description of why this area is of particular interest written by Audubon:
Response: Comment acknowledged.	
Fleishman, Barbara	Life would be significantly diminished if we lose our marvelous birds....even one species. Please take precious care to prevent that....thank you:)
Response: Comment acknowledged.	
Fletcher, Judith	Please reject the Westway and Imperium oil terminal proposals. The risks are too many and too great. You should support the protection of Grays Harbor, its marine life, and its people. There are better ways to meet our energy needs. Washington state should continue to lead the nation on safe, renewable clean energy solutions and say no to more oil, coal, or nuclear.
Response: Comment acknowledged.	
Fletcher, Monica	Save Grays Harbor and its unique fauna!!!!!! Thank you very much.
Response: Comment acknowledged.	
Forrest, Karla	I ENDORSE THE REQUEST BELOW TO REJECT THE OIL TERMINALS PROPOSED FOR GRAYS HARBOR. BE PROACTIVE AND PROTECT THIS ECOSYSTEM.
Response: Comment acknowledged.	
Fournier, Carla	We do not need to ruin our natural habitats by using our resources to export to another country.
Response: Comment acknowledged.	
Fraaaser, JoAnn	You kill the birds, you kill us all.
Response: Comment acknowledged.	
Franklin, Constance	As an American gravely concerned with thriving biodiversity, I strongly support the protection of Grays Harbor……..
Response: Comment acknowledged.	
Franzmann, Paul	With oil, it's not 'if,' but 'when.' When it happens, there will be hell to pay and irreversible damage. Giving up Grays Harbor's natural wealth for the sake some short-term, short-sighted corporate profiteers is difficult to fathom. That you would contemplate such a project as we near the end of fossil fuels' stranglehold on the the economy and climate is unconscionable.
Response: Comment acknowledged.	

Frazer, Scott	The economic benefits of ecotourism could be lost or adversely impacted by "dirty" oil transportation activity. Grays Harbor is host to hundreds of thousands of resident and migrating birds that rely on the estuary. Cumulative impacts of these chemicals and oil leaks is cause for grave concern. Endangered salmon and other small fish will likely suffer from routine operation of oil terminals. Say no to oil and coal transport proposals.
Response: See Response to FL1-1.	
Frazier, Maggie	Apparently, all the information "out there" doesnt prevent these the oil industry from continueing to damage our planet! This kind of destruction to our environment needs to come to a halt - BEFORE its too late. Is the only thing that matters greed & power? If we continue to eradicate specie after specie - guess what - the last one to go will be ours! Stop the oil terminals, the fracking, the oil trains, the pipe lines. Put the money into alternative ways of heating & cooling our planet. If we allow this kind of thoughtless money-hungry damage to go on - we deserve what we absolutely will get inthe end.
Response: Comment acknowledged.	
Freeland, Adele	Grays Harbor WA could not be a more inappropriate location for the proposed railroad oil terminal. This shallow port is a essential migration feeding stop for shorebirds in spring and fall. In spring this harbor is the last feeding stop for these birds before arriving in Alaska. Fall migration, many of these birds fly to Central and South America for the winter. Designated as a major habitat for migrating birds. The risk of oil related development, spills, dredging to allow tankers into the bay is too great. Please reject proposals for the oil-by-rail terminal.
Response: Comment acknowledged.	
Freeland, Frederick	Most animal species on earth have a significant trait that they share. In general, animals DO NOT despoil their living spaces. Humans seem to be the exception to this rule. We continue to contaminate and spoil just about every space we come in contact with. This has got to stop before there is nothing safe left in this world. As we already know, fully 20% of the world's human population does not have access to clean water. At the rate we're going with our sad efforts to preserve the environment, that number will rise to 30% or more. Creatures of the world need water (both fresh and saltwater) to survive. Let us please stop reassuring that everything is OK, when we know it's not
Response: Comment acknowledged.	
Fresco, Colleen	It is time to make a serious commitment to protecting our Country's natural resources. Migrating birds are a natural resource.
Response: Comment acknowledged.	
Frey, Brenda	I want you to use your position and make sure that no oil or coal projects come to the Grays Harbor. It is not worth the risks that will be there for humans and animals. Thank you for taking the time to read this letter.
Response: Comment acknowledged.	
Friedman, Roni	WHAT IS THE QUESTION HERE? "HUNDREDS OF THOUSANDS OF RESIDENT AND MIGRATING BIRDS".... This is supposed to be a SAFE HAVEN for these beautiful creatures! Shame on any person who disturbs this sacred area.
Response: Comment acknowledged.	
Fronce, Linnea	FIRST THE OIL COMPANIES WANTED TO DO MORE DRILLING TO MAKE US MORE OIL INDEPENDENT. NOW THAT THEY ARE DRILLING OUR WILDLANDS THEY WANT TO MAKE MORE MONEY EXPORTING OIL. HOW DOES THIS MAKE US MORE OIL INDEPENDENT????? IT ONLY DEPLETES THE RESERVES FASTER. OIL COMPANIES ARE ONLY INTERESTED IN PROFITS. THEY CARE NOTHING ABOUT THE FUTURE OF OUR COUNTRY.
Response: Comment acknowledged.	
Fuderer, Laura	As Conservation Chair of the South Bend-Elkhart Audubon Society, I write to you on behalf of our 800 members. A major part of our mission is to work to preserve America's wildlife and natural habitat. Many of us have traveled to the Pacific Coast to view the wildlife and the risk of oil spills is of great concern to us.
Response: Comment acknowledged.	
Fulton, Sally	Please protect our natural environment for birds and humans alike.
Response: Comment acknowledged.	

Gabrie, Joan	Love the birds, but it's not just about them, but all of us and the planet. KEEP IT IN THE GROUND!!!
Response: Comment acknowledged.	
Gabriel, Judith	With all of these potential problems, just reject these two pending proposals. Our shore lines are so important, so something this toxic is not acceptable. Neither is building right up to the shore's edge or letting people put preen and roundup on lawns where the run off goes right into the ocean. When is the government going to stand up to toxic businesses and ridiculous private practices to protect the earth and all of us. Grays Harbor is a site of hemispheric importance to birds.Right, did you hear, hemispheric!!! Oil spills are just so toxic that any time you can eliminate a threat, you should. Let's start building infrastructure for green energy. Should have been started over 40 years ago. Let's have the political will to do it now. Amen! I support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Gagnon, Marsha	I would like to express some of my own concerns regarding the oil terminal proposals in your State, followed by the general comments posted below my words. I live in Florida. As you know, the Gulf of Mexico experienced the largest oil spill in U.S. history, the Deepwater Horizon oil spill. Even though this is not exactly the same as what is being proposed in WA, there are many parallels. The Deepwater Horizon spill was responsible for spilling millions of gallons of crude oil, starting on 4/20/2010, into the Gulf for 87 days. This spill affected 16,000 miles of coastline in Texas, Louisiana, Mississippi, Alabama and Florida. So take a look at the map and see how much of your area will be affected should oil spill or leak at the terminus or while enroute by train over bodies of water or across land masses. Louisiana alone had 125 miles of its 400 mile coastline affected. There were more than 8000 animals (birds, turtles and mammals) reported dead just 6 months after the spill, including many already on the Endangered Species list. And those were just the ones found. So take into account how many animals, birds and marine life will be affected in your area. The spill affected many people as well. More than 30,000 people helped with collecting oil, cleaning up, taking care of animals, etc. The long term effects on all of these people has not even been realized yet, or maybe it has, for example, cancer. And to top it all off, oil is still washing up on the shores. Everything is still being affected by this spill over 5 years ago. So take into account the many human lives that will be affected. The fishing industry, soil contamination, farming, agriculture tourism, boating, swimming, and the beautiful scenery will never be the same. And do not say it will not happen because it will, in some small or large way or another. In relation to one of the species of birds that will be affected in your area, the Red Knot, here is another problem area. Several weeks ago, a large number of Red Knots were found in a sickly state on the west coast of Florida in the Ft Myers area. Attempts were made to save as many as possible, some succumbed and others survived. It was determined that they had contracted Red Tide. Now Red Tide comes from organisms. It is a bacteria. There has been an increase in Red Tide in the past 5 -10 years. I cannot say that Red Tide is caused by oil spills but I can say that any contaminant spilled into waters in such large quantities will definitely have an affect on the organisms in the water and everything that comes into contact with those organisms. Humans and animals alike will be affected for many years after an oil spill or any contamination. Two internet sites to read: www.ocean.si.edu/gulf-oil-spill and www.gulfpreserve.org/redtide/effects.htm Please strongly consider the disastrous effects that any crude oil installations will have in the Grays Harbour area and beyond.
Response: Comment acknowledged.	
Gannett, Katherine	As someone who grew up beside the Pacific Ocean on the central California coast, raised by an avid bird-watching enthusiast (my dad, Vitaly Volmensky, served as chapter president of the Monterey County Audubon Society for 18 years in the 1980's and 1990's), I have a fair understanding of the fragility of marine ecosystems. Even one mishap at Grays Harbor would be devastating to the local environment's avian and fish populations, thereby negating financial profit via cleanup expenses. The long-term risks outweigh other short-term considerations.
Response: Comment acknowledged.	
Garcia, Dawn	I am a biologist and used to live on Bainbridge Island, where the shores team with life. I know the value of the marine, freshwater habitats to all of us, wildlife and people. Nothing when they contain oil.
Response: Comment acknowledged.	
Gardner, Louise	It's been my understanding that the United States and the rest of the world are trying to get away from the use of fossil fuels. Why would you encourage China and others to use more oil? Please make Grays Harbor off limits to the oil industry. Thank you.

Response: Comment acknowledged.	
Garhart, Christine	I have read that there are 3 proposed oil terminals in the Grays Harbor. As a supporter of protection of wildlife, I think development in this area is short-sighted and dangerous. It could have devastating effects on Red Knots and other species of birds. The east coast population of Red Knots is already in trouble. Development of oil terminals will only contribute to climate change.
Response: Comment acknowledged.	
Garrett, Jo	Dear People, I am writing to you in regards to the proposals for Grays Harbor. One accident and there will be serious trouble. You've got to say no to this project.
Response: Comment acknowledged.	
Gaspero, Cheri	Frankly, the Obama Administration gets a big, fat F when it comes to environmental and wildlife policies vs. BIG OIL!!
Response: Comment acknowledged.	
Geist, Cathy	As a conservation biologist and environmental science instructor, I am very concerned about these numerous and enormous risks.
Response: Comment acknowledged.	
Gerl, Carol	Continued use of fossil fuels not only devastates habitat for wildlife, it impacts all of us. See how Grays Harbor fares at http://sealevel.climatecentral.org/
Response: Comment acknowledged.	
Gertler, Doris	I am sitting on the shore of the Gulf of Mexico remembering the horrors of the BP oil spill and the likelihood that the Gulf and our environment will never recover. Is it that difficult a lesson? Can we not learn from our mistakes and save ourselves and what we hold dear?? Please reject the latest great idea by the oil business.
Response: Comment acknowledged.	
Gertz, Jay	We need to stop selling out to Big Oil. Their only concern is for profit margins for the fat cats. They promote the idea of jobs, jobs, jobs, but the jobs they provide are nothing compared to the destruction of the environment and the Hoquiam community.
Response: Comment acknowledged.	
Gevarter, Mona	Please save the birds.
Response: Comment acknowledged.	
Gilligan, Ainslie	Please pay attention to the science. You are public servants, and can and should act with conscience.
Response: Comment acknowledged.	
Glackin, Joseph	Come see bayway, NJ and the meadowlands if you want a vision of your future under Exxon.
Response: Comment acknowledged.	
Glenning, Erin	Look to the future.
Response: Comment acknowledged.	
Glitzenstein, Jeff	I'm a Floridian and not from Washington state, but I do care about estuaries and shore birds. I agree the oil industry does not have a good track record as we in north FL know from the massive BP oil spill. So I hope you all in Washington state will not put yourselves at the same risk of massive ecological destruction that the Gulf Coast has experienced.
Response: Comment acknowledged.	
Gloor, Carol	It is time to ask ourselves, what is more important, the profits of oiil companies or the life of the planet? Everyone talks about a better world for our grandchildren, but the sad fact is that fossil fuel will be mostly unavailable to them, but they will still have to live on this planet. the best they can.
Response: Comment acknowledged.	
Goddard, Megan	Stop Oil Development in Coastal Habits!
Response: Comment acknowledged.	
Godinez, Richard	Please protect our wonderful shoreline, ocean, and wildlife such as the Red Knot.
Response: Comment acknowledged.	

Goffe, George	I support the protection AND INSIST IN the PROTECTION of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Goldin, Susan	I ask that you reject the Westway and Imperium oil terminal proposals. Please do this.
Response: Comment acknowledged.	
Goldsmith, D	We love the Grays Harbor area and come there with our friends to walk and watch birds. Please, please do not allow the expansion of oil terminals.
Response: Comment acknowledged.	
Gonzales, Joe	OUR PLANET IS BURNING!!
Response: Comment acknowledged.	
Gottfried, Tby	We need to keep our wildlife safe from oil spills.
Response: Comment acknowledged.	
Gouge, Deborah	There was a time when people accepted projects like this as development. Now more and more people can see only their toxicity, environmental damage, and financial waste.
Response: Comment acknowledged.	
Gould, Anita	Due to its numerous and enormous risks, I ask that you reject the Westway and Imperium oil terminal proposals. The last thing we need now is doubling down on fossil fuel infrastructure. I contributed to Jay Inslee's campaign back when he was running for Congress; now that he is a governor, I hope that his administration and his state will do the right thing.
Response: Comment acknowledged.	
Gowan, Mark	Pathetic, business as usual. I hope there's a hell for people like you!
Response: Comment acknowledged.	
Graffagnino(ne Novakoski), Mary Ann and Mr. Frank	PLEASE TAKE THE RIGHT, FAIR, JUST, HUMANE AND HEALTHY ACTION AND STOP OIL DEVELOPMENT IN COASTAL HABIATAT.
Response: Comment acknowledged.	
Grandt, E	And if these substances are harmful to fish, what might they do to PEOPLE? There are better ways to meet our energy needs. Enough clean energy from sunlight hits the planet each day to power all human needs for decades. Why not concentrate on using that!
Response: Comment acknowledged.	
Greany, Dany	Picture this: three hundred people with shotguns are hired to shoot as many birds as they can in Grays Harbor. Every year, indefinitely. The shooting would be fabulous the first couple years, but quickly peter away. Turning the harbor into an oil terminal might not be quite as abrupt for the birds as the shotgun team, but the direction would be the same. Some of the birds might find other coastal stretches in the area to feed and rest, but there is a reason the birds pack into Grays Harbor. There is nothing else like it around. Because of their long-term environmental promise, please reject the Westway and Imperium oil terminal proposals. There are better ways to meet our energy needs. Washington state should lead us toward safe, renewable clean energy solutions and say no to more oil and coal.
Response: Comment acknowledged.	
Greathouse Neel, Donna	I am wholeheartedly opposed to crude oil by rail or any other delivery system that goes through Washington. Cities up and down the coast are saying no to this. You need to do the same because it is the only decent choice for Washington. Washingtonian's have spoken out strongly for alternative energy for our state. Please stand with us.
Response: Comment acknowledged.	
Greenberg, Joyce	The most precious on Planet Earth is water, not oil. Give priority to water purity.
Response: Comment acknowledged.	
Greenwald, Ken	THIS IS EXTREMELY IMPORTANT! Please carefully read the statements below, then act accordingly. Thank you:
Response: Comment acknowledged.	

Greer, Jill	It is important to look objectively at the science here. Clearly, DEIS's findings for Westway and Imperium oil terminal proposals in Grays Harbor tell us that the risks of oil spills are great, with no reliable long-term method of preventing spills. Such outcomes would lead to negative effects to our marine ecosystem and its living creatures. Furthermore, the additional negative impacts upon humans in the region include significant risk for environmental degradation such as poisoning the waterways, and air and noise pollution from the rail traffic. Direct danger to human and non-human life in the region come from the hazards of shipping via train, including train accidents, increased train and oil tanker traffic, and vehicle delay at railroad crossings.
Response: Comment acknowledged.	
Gremillion, Sharon	Living in the southern coastal region I have seen the effects of oil spills and accidents on our wildlife. Please do not endanger our wildlife! These beautiful creatures cannot be replaced. We need to keep ALL our wildlife here so future generations can have the pleasure of experiencing their beauty.
Response: Comment acknowledged.	
Griffin, Mildred	SO be it, when you kill the birds and wildlife you also kill the rest of us. Say NO to oil and gas its just all about the $$$$$$$.
Response: Comment acknowledged.	
Griffith, Barbara	I have seen to many photos of oil spills from broken pipe lines that have devastated neighborhoods to believe that something like that couldn't happen in Grays Harbor. There are many other places in Washington that would be more suitable for this terminal. The danger it poses to the bay because of a oil spill is just to great to take a chance on this happening once spilled oil is in the water it will be spread everywhere there is no known way to completely clean it up you will find it under rocks around the bay for years to come.
Response: Comment acknowledged.	
Grochowski, Norman	Learn a lesson from modern day Germany. Their wind and solar grid outperforms the combined energies of oil, coal and nuclear. They don't do this everyday, however they are setting more and more record days as their massive program goes into effect. They will soon be exporting energy to other EU countries and making huge profits doing so. They made this commitment to phase out nuclear when Fukushima nuclear blew up a few years ago and like modern people went into action using modern technology to harness the unlimited free sources of solar and wind. It's only when modern people start using intelligence, that anything can change for the better. The ten hottest years on record have just taken place and we here in the US sit around like lost children claiming we can't do anything about it because the oil barons told us so. This planet is heating up and you may deny it as much as you want, but you will not escape the consequences. Learn to say No, to the foolish ones who put profit ahead of any and every cost. Ignore their arguments and refuse their pay offs and bribes. Do it for your loved ones and save your planet IF you can.
Response: Comment acknowledged.	
Grossman, Marilyn	Due to these numerous and enormous risks, AND FOR THE SAKE OF YOUR CHILDREN AND GRANDCHILDREN, I ask that you reject the Westway and Imperium oil terminal proposals. Grays Harbor is a site of hemispheric importance to birds. BIRDS ARE CRITICAL TO THE WELL BEING OF THE EARTH!
Response: Comment acknowledged.	
Gudmundson, Lori	Please keep our state safe for all of us.
Response: Comment acknowledged.	
Guerra, Suzanne	Washington state should continue to lead the nation on safe, renewable clean energy solutions-just say no to more oil and coal. Washington State has a unique and irreplaceable resource which deserves protection.
Response: Comment acknowledged.	
Guindon, Ernest	The Pacific Northwest has some of the most beautiful and pristine wildlife habitat in America. It is our sacred duty to preserve it for generations into the future. We CANNOT do that if we allow big oil to drill or pass oil through this habitat.
Response: Comment acknowledged.	
Guthrie, Barbara	Birds are not the only wildlife at risk to the environmental degradaiton that would result from this ill-conceived plan to place oil ternimals at Grays Harbor. TThis is no place to locate oil terminals!

Response: Comment acknowledged.	
Haak, Delores	Need I say they are also detrimental to humans?
Response: Comment acknowledged.	
Hackett, Marcia C.	I strongly oppose the development of oil terminals in Grays Harbor.
Response: Comment acknowledged.	
Hagen, Wendy	Please think of the future of our world, not just immediate profits and greed!
Response: Comment acknowledged.	
Haile, Robert	Keep our coastlines safe, the whole ocean depends on it.
Response: Comment acknowledged.	
Halligan, Michele	In keeping with the message above, I urge you to consider the wisdom of the Iroquois ("Seven Generations"): "Look and listen for the welfare of the whole people and have always in view not only the present but also the coming generations, even those whose faces are yet beneath the surface of the ground the unborn of the future Nation."
Response: Comment acknowledged.	
Hall-Skank, Nick	I have a personal connection to Grays Harbor, and would not want to see anything bad happen to this beloved national treasure.
Response: Comment acknowledged.	
Hamilton, Wayne	We're sailors (and birders) who have sailed in Gray's Harbor and strongly oppose an oil-transfer facility there.
Response: Comment acknowledged.	
Hammett, Gary	We all know self policing by corporations is a sham and built in so called "acceptable levels" of incidental damage only help them to obscure and circumvent environmental rules.
Response: Comment acknowledged.	
Hancock, Karen	Please, the risk to all of us, is too great. Give up on the oil business. It's the right thing to do. It is morally wrong to risk the lives and futures of birds, animals and/or humans.
Response: Comment acknowledged.	
Harbison, Candis	Nature-based tourism can be a permanent source of local economic support. Oil is on its way out in favor of wind and solar energy. Do you really want to sacrifice the long-term good for a short-term boost?
Response: Comment acknowledged.	
Harden, Ronald	Out nation's natural heritage should not always be sacrificed just because one industry wants it to be.
Response: Comment acknowledged.	
Hargrove, Sue	These are fragile and unique birds, please don't endanger their lives and habitat.
Response: Comment acknowledged.	
Harkins, Lynne	It is really deeply disturbing to see how much would be put in peril, serious peril! were these proposals allowed to become menacing realities in Grays Harbor! I very strongly support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Harlib, Amy	NO TO OIL INSANITY! CONVERT TO USED COOKING OIL, SOLAR, WIND AND TIDAL POWER!
Response: Comment acknowledged.	
Harrie, Susan	We can't afford to lose any more species to flipping oil! The extinction of species that may have even more right to life than the destructive human race definitely shouldn't come from something we have caused.
Response: Comment acknowledged.	
Harrington, Nancy	I am an educator, a concerned citizen and an active voter. I have come to learn that the findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor
Response: Comment acknowledged.	

Harrington, Rita	This is an important issue for our environment and especially our birds. I hope you will make the right decision.
Response: Comment acknowledged.	
Harris, Fama	Hello and thank you for allowing me the privilege of speaking out against big oil reform proposals that have a tremendous likelihood of future oil spills, The environmental damage to marine habitat in Grays Harbor would most likely be very significant. We cannot take the risk of promoting a program that could lead to possible destruction of any of these endangered species.
Response: Comment acknowledged.	
Harris, Mary	Please put these in a place that isn't as hazardous to birds.
Response: Comment acknowledged.	
Harris, Robert	The West Coast states of Washington, Alaska, Oregon, and California have an inherited and deeply consequential responsibility to sustain the resources essential to the well-being and survival of all migrating species of birds, fish, and wildlife. This is threatened if the Westway and Imperium Oil Terminal at Grays Harbor is allowed to go forward. I ASK THAT YOU REJECT THE WESTWAY AND IMPERIUM OIL TERMINAL PROPOSALS. YOU HAVE AN OBLIGATION AS AN INTEGRAL MEMBER OF THE ENTIRE WEST COAST COMMUNITY, AND TO PLACES FARTHER AWAY TO THE NORTH AND SOUTH AND TO YOUR EAST.
Response: Comment acknowledged.	
Harvey, Garrilynn	The oil industries are vastly wealthy. Yet such excessive wealth could easily be spent upon reconstruction of loss habitats. The wealth could be spent upon a great many things to make this world a cleaner, healthier, far better place. Wisdom dictates the the world responds to kindnesses, charity, forethought. Thank you for listening,
Response: Comment acknowledged.	
Healy, Carol	Any kind of problem with oil could ruin the attraction of that area for tourists and bird-watchers. Please don't make it a potential disaster for the state.
Response: Comment acknowledged.	
Hebberger, Jo Anna	We must stop supporting the use of more fossil fuels, this is the wrong direction for this country to move. Global warming and the compromising of our natural areas must be addressed seriously.
Response: Refer to the Master Response for the Purpose and Focus of the EIS.	
Heffernan, Kathy	Please protect the Marbled Murrelet, Snowy Plover, Streaked Horned Lark, and the thousands of other shorebirds that congregate at Grays Harbor. Moreover, toxins from the oil terminal can affect the marine food web upon which these birds rely. Washington state should continue to seek safe, renewable clean energy.
Response: See Response to FL1-1.	
Henry, Anita	Please give the birds a break. Please give the birds
Response: Comment acknowledged.	
Herring, Peter	Fossil fuels are exactly that - fossils; we can no longer afford them. As we wean ourselves from fossil fuels, greenlighting more fossil fuel projects meant to extend far in to the future is antiproductive and anti-climate. And in this case, anti-bird as well.
Response: Comment acknowledged.	
Hess, Dani	Building more infrastructure for yesterday's energy would be moving in the wrong direction and would not support future generations in the long run. Let's teach others, a new generation, about other energy solutions that we can be proud of without harming any type of species.
Response: Comment acknowledged.	
Hewitt, Judy	Gray's Harbor is a very protected habitat. If a spill occurs it will lay inland and completely destroy a beautiful harbor along with the complete ecosystem. The oil industry has been completely irresponsible when it came to cleaning up the messes they cause. The people living around Gray's Harbor will be the one's to suffer if a spill happens and the oil industry abdicates it's responsibility once again. All anyone must do is take a look at the Gulf and Exxon-Valdez spills to see how devastating an oil spill would be to Gray's Harbor. In fact a spill into Gray's Harbor would be worse because it is such a protected, inland harbor.
Response: Refer to the Master Responses for the Purpose and Focus of the EIS and Liability and Responsibility for Incidents.	

Hewitt, Sheri	We just need to leave some places alone,
Response: Comment acknowledged.	
Hiatt, Richard	The days of Big Oil are over. Please stop allowing yourselves to be lured by payoffs, deals, and/or egregious lies which allow it to continue. The writing is on the wall - so please read it. Pollution, contamination, and global warming - all caused by "oil & gas" should be our greatest concern now - and you know this. Please respond to the oil terminal proposals described below "responsibly" and get on board with helping us save ourselves. Literally "twice" the number of people are now employed in the renewable energy industry than in the fossil fuel industry. Again, the writing is on the wall. With that said, please read the following.
Response: Comment acknowledged.	
Hickey, Rebecca	Please do not let the oil companies buy this disaster for the environment!!!
Response: Comment acknowledged.	
Hiers, Richard	We have seen here in Florida how oil spills can destroy (not just decimate) marine, bird and other wildlife habitat, along with hundreds of thousands of living things known, and millions unknown.
Response: Comment acknowledged.	
Hill, Frank	Our addiction to energy will lead eventually lead to the destruction of most or all life on this planet.
Response: Comment acknowledged.	
Hiner, Ann	Even though I live in northern California, I wish to speak for the migratory birds that stop in Washington state. We were witness to train derailments in North Dakota were we grew up under a long trestle bridge in Valley City. The explosions and fires are ruinous!
Response: Comment acknowledged.	
Hines, Carol	You may think that because I have an Arizona address I have no knowledge of Hoquiam nor even of Washington State. Nothing could be further from the truth. I lived and worked and vacationed for years in the Northwest and remember the pristine beaches very well. I have been a "birder" for many years as well, so I do have a vested interest in what goes on in Washington. Please think of the future and not just the short term. I know Hoquiam has been impacted by the loss of lumber income, but do not think that this is the jackpot at the end of the rainbow for you. It isn't.
Response: See Response to FL1-1.	
Hines, Whitney	Wildlife is our priority, not out dated fossil fuel!!!!!!!
Response: Comment acknowledged.	
Hites-Clabaugh, Lucinda	As a former backcountry park ranger and science teacher, I beg you to acknowledge the devastation even a small oil spill leaking into the habitat of the Red Knot or Snowy Plover or Marbled Murrelet or Streaked Horned LArk could cause. No corporate greed can justify these losses. We HAVE the renewable clean energy technology to free us from using obsolete and atmosphere-damaging fossil-fuels. Please help lead the way to a better choice for our future!
Response: See response to FL1-1 above.	
Hiteshew, Eleanor	Chances are almost inevitable that one or more of these scenarios will unfold if these proposals are not rejected. The entirety of western flyway bird populations are already feeling the impacts of severe drought. These developments could be a "camel's back straw", deepening the peril of one or more species. We should also not be sending fuels abroad. We need less CO2 in the air, not more!
Response: Refer to the Master Response for the Purpose and Focus of the EIS.	
Hoeffel, Gwendolyn	Respect the Ramsay Treaty. Protect safe passage for migrating birds.
Response: Comment acknowledged.	
Hogan Blithe	Please seriously consider how the findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor show that the risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife could be significant.
Response: Refer to the Master Response for the Purpose and Focus of the EIS.	
Hogan, Judith	I live in Santa Barbara, California, where 2 major oil spills have occurred. The visible and invisible detrimental effects of oil on birds and other land and marine animals have been tremendous.
Response: Comment acknowledged.	

Holcomb, Peter	In order to survive, humans must keep global warming to a minimum, and the only way to do that is a drastic reduction in burning fossil fuel. The Gray's Harbor export proposals would INCREASE not reduce fossil fuel burning
Response: Comment acknowledged.	
Holliday, Phyllis	On a personal note, I am supporting any way to keep away from more possibility of devastation for birds, all creatures, sea and wilderness.
Response: Comment acknowledged.	
Holton, Peggy	Too much wildlife has already been sacrificed to oil spills!
Response: Comment acknowledged.	
Honeychuck, Nancy A.R.	Leave the oil in the ground. It is killing our planet. It is killing the birds. It is turning your own grand children and great grand children into deadman before they are eve born. Reputable studies show ……
Response: Comment acknowledged.	
Horn, Nathana	Although I am not currently resident in Washington State, I have lived and worked in the Seattle area in the past, have family there, and many friends. It has been a pleasure to bring my children there and to travel the Washington State coast. It would be a shame and a waste to take short term gain in exchange for the timeless assets of water and clean harbors that currently exist.
Response: Comment acknowledged.	
Horowitz, Laura	No method of transporting oil is safe. We must stop using it completely and turn to renewable energy.
Response: Comment acknowledged.	
Hoyle, Lester and Judy	THIS IS ILLEGAL!!
Response: Comment acknowledged.	
Hoyt, Katherine	As a person born and raised in Washington State, I urge you to reject the oil terminal proposals.
Response: Comment acknowledged.	
Huber, Arlene	My home is in Northeast Ohio, but my concern for environmental damage and risk to wildlife in your state where at Grays Harbor there exists a site of hemispheric importance to birds is every bit as real as it would be if the oil-by-rail terminal were being proposed for rail sites in Medina County, Ohio.
Response: Comment acknowledged.	
Huebner, Ron	Please, enough is enough!
Response: Comment acknowledged.	
Huk, Maryann	My husband is a Washington native and we lived for a number of years in Seattle. We spent many weekends driving around the Coast, feeling lucky to be living near such a beautiful place. Now we find it's being threatened. There are better ways to meet our energy needs.
Response: Comment acknowledged.	
Hurt, Ida	It's true we can do without oil under some circumstances, but our wildlife cannot do without safe habitats. It is up to us to make sure they have a place to be wild and free.
Response: Comment acknowledged.	
Hyndman, Donna	The harbor, its people and all the life it supports are of far greater importance and value to earth and our existence than the oil terminal proposals... Thank you!
Response: Comment acknowledged.	
Irvine, Linda	Pllease, Say no to the oil developers whom are only interested in the almightly dollar.....
Response: Comment acknowledged.	
Iseri, Martin	Does Washington state exist merely to serve the oil industry?
Response: Comment acknowledged.	
Jackson, Marianne	PLEASE find a safe solution for these few remaining birds. Thank you, I hope.
Response: Comment acknowledged.	

Jackson, Anne	DO ALL YOU CAN TO PROTECT OUR ENVIRONMENT !! :
Response: Comment acknowledged.	
Jacques, Karen	It's called clean energy - energy that is renewable and that doesn't cause the terrible harm that fossil fuels cause.
Response: Comment acknowledged.	
Jaffe, Burton	We do not need to pollute our country for fuel needed in Asia or anywhere.
Response: Comment acknowledged.	
Jagiello, Carol	These projects never work out well. This is about gain for private industry at the expense of the common & public good. Isn't Hanford enough for one state? Oil or gas, the hazards are similar and will never be remediated, ask Kalamazoo & Mayflower look at the Exxon Valdez settlement, just with drawn after 9 years - a $130 million dollar settlement and remediation that never began, withdrawn this month by the feds for their freinds at Exxon.. Please see http://concernedhealthny.org/ Compendium 3.0 is 151 pages with 653 footnotes. Spoiler alert: here are the final three sentences: All together, findings to date from scientific, medical, and journalistic investigations combine to demonstrate that fracking poses significant threats to air, water, health, public safety, climate stability, seismic stability, community cohesion, and long-term economic vitality. Emerging data from a rapidly expanding body of evidence continue to reveal a plethora of recurring problems and harms that cannot be averted or cannot be sufficiently averted through regulatory frameworks. In the words of esteemed pediatrician Jerome Paulson, MD, there is "no evidence that...fracking can operate without risks to human health.... Any claims of safety are based on wishful thinking."
Response: Comment acknowledged.	
James, Gordon	Don't accept the Westway and Imperium oil terminals. Thank you.
Response: Comment acknowledged.	
Jameson, Anne	Our wildlife must be protected, especially from fossil fuel exploration (which should be stopped anyway). Now it the time to protect our birds and other wildlife by moving away from fossil fuels!
Response: Comment acknowledged.	
Janke, Susan	You pathetic fools: We need the Earth, it doesn't need us! Get it through your thick skull. I hope you really love your children and your grandchildren. You are leaving them a dead planet.
Response: Comment acknowledged.	
Johnson, Jeannine	It's Not " If "There Will Be A Oil Spill It's " When " !
Response: Comment acknowledged.	
Johnson, Philip	BIG OIL IS BECOMING A DISASTER FOR OUR ENVIRONMENT. FORGET IT AND PUSH HARD FOR RENEWABLE ENERGY.
Response: Comment acknowledged.	
Johnston, Stuart	I'm a wildlife biologist that used to do work for the WDFW. I fully understand what a devastating effect a major oil spill would have on the Red Knot here along the Pacific Coast if that happened. It would ruin their refueling stop in Grays Harbour. I live in the Columbia River Gorge: already we have many, many more trains that thunder through Bingen and Lyle carrying oil or gas and train after train of open-topped coal cars. We are not stupid. We have all seen the ghastly blown up trains in Quebec and West Virginia on the news. Do you think we want to live here like sitting ducks just waiting for our turn: Do you really??
Response: See Response to FL1-1.	
Jones, Gary	I remember hearing a National Lampoon ad for Monolithic Oil, whereby the pitchman bragged 'bout "Killing all the birds that nest around our beautiful oil refineries." Please, that was sarcasm, not a suggestion.
Response: Comment acknowledged.	
Jones, Laurel	Please reject the Westway and Imperium oil terminal proposals.
Response: Comment acknowledged.	
Jones, Majda	There is clear science that must and should be acknowledged in your decision about the oil by rail terminals in Grays Harbor. We usually do not get second chances in this sort of issue, so let's do it right the first time.

Response: Comment acknowledged.	
Jones, Peter	I have visited the Grays Harbor area for bird watching several times over the years. It is a spectacular site for a great diversity of shorebirds and other species. To develop it for oil export would be a grave mistake. You will not only threaten the birds that use this important stop over site, but you will deter bird watching tourists from far and wide from visiting your spectacular part of the world.
Response: See Response to FL1-1.	
Jones, Scott	My family has spent time vacationing in this natural area. We want to see it protected. Thanks.
Response: Comment acknowledged.	
Jurczweski, Carol	PLEASE DO NOT BUILD THESE ENVIRONMENTALLY DAMAGING TERMINALS!
Response: Comment acknowledged.	
Kahle, Judith	While I don't live in Washington, this is an issue what affects migrating birds up and down the west coast.
Response: Comment acknowledged.	
Kallenbach, Cheryl	The oil industry has no safety record - you can trace their path of death and destruction everywhere they go. An oil spill in the Harbor would be catastrophic for the entire area and everything living there - including the people.
Response: Comment acknowledged.	
Kaohelaulii, Annette	Please do the right thing for the birds and for the people of your state and reject this proposal which only benefits another country.
Response: Comment acknowledged.	
Karpf, Jill	This is the time to take action to save these birds!
Response: Comment acknowledged.	
Karr, Joe	WHEN WILL THIS OIL INFRASTRUCTURE JUGGERNAUT BE STOPPED???? THIS IS YESTERDAY'S FUEL, AND YET WE STUPIDLY CONTINUE TO FACILITATE IT.....REJECT THIS PROPOSAL.....IT'S THE LOGICAL THING TO DO.
Response: Comment acknowledged.	
KASTEL, DIANE	One oil spill or accident in Grays Harbor could wipe out a significant portion of the Red Knot population in the Pacific Flyway. Speak out against the development of oil terminals in Grays Harbor. Take Action " Critical coastal estuaries could face devastating consequences for birds if the oil industry is successful in expanding its operations in Grays Harbor in Washington state--a site visited by hundreds of thousands of migrating shorebirds every year. Three proposed new oil terminals would store roughly 91 million gallons of toxic crude, most of it for export to China. Our birds rely on this Pacific coast estuary to rest and refuel during migration. One oil spill would devastate this fragile marine ecosystem. We are writing the Washington Department of Ecology and the City of Hoquiam today and telling them to reject the oil terminals. Located on Washington's outer coast, Grays Harbor is a critical spring migration stop-over site for Red Knots in the Pacific Flyway. A climate-endangered bird, the Red Knot uses the North Bay of Grays Harbor almost exclusively during the month of May to feed on rich marine food sources before flying non-stop to northwestern Alaska and Wrangel Island, Russia to nest and raise their young. One oil spill or accident could wipe out a significant portion of the Red Knot population in the Pacific Flyway. Oil extraction, transport, and export across our country contributes to greenhouse gas emissions responsible for global warming. If the terminals are built, as much as 126,860 barrels of crude would arrive by train every day, another enormous source of risk. Oil trains have a bad safety record--in 2014 there were 141 oil train spills across the United States. The deadline to speak out against two of the proposed terminals in Grays Harbor is October 29. We are adding our voices in support of our birds. We are tellling the State of Washington that Grays Harbor is important to all of us who care about birds. We can't afford to turn over our best coastal habitat to an industry that has shown it cannot prevent or contain oil spills. We've seen the devastating effects of oil spills in Alaska and the Gulf Coast--let's keep that from happening in Washington. My family and I are telling the Washington Department of Ecology and City of Hoquiam not to allow the development of oil terminals in Grays Harbor.
Response: See Response to FL1-1.	

Katzman, Judy	The hazards to shore birds of a possible oil spill are intolerable. These species need our protection. Rather than drill and spill, let's invest NOW and FOREVER in renewable sources of energy. It's insane not to.
Response: Comment acknowledged.	
Keese-Farkas, Ingeborg	How many times do we have to repeat and repeat the same plea, until somebody gets the message and listens. Have we not learned anything from all the bad mistakes we have made ? It is unbelievable that we disregard lives , whether they are Birds, Fish, Animals, or people. When it comes to Money , I guess, nothing matters." We have it, we have the power and we can." On top of it is the Pollution, the Global Warming, the Eco System. What good does all the Oil production if there is no more life , nothing left. We can not take the money with us when we die. Why not use it to better the world, to built Solar-Power, to reduce the exhaust, to clean up the messes we have already made. I am sure all the animals and all the people with Allergies, with Cancer and other problems would be very grateful and thank you. May be we could live healthy lives. Please start thinking and doing the correct way, the caring way, and let us live in God's clean and beautiful world again Sincerely Ingeborg Keese-Farkas
Response: Comment acknowledged.	
Kelley, Dorinda	If you want to ruin your state, go ahead with this scheme.
Response: Comment acknowledged.	
Kelly, Kathy	We know from experience that oil spills never really stop affecting the ecosytems where they occur (and far from those sites). That knowledge has been supported by the findings in the DEISs for Westway and Imperium oil terminal proposals Beyond the irreversible damage to numerous species, other hazards from these projects are that they continue our dependence on oil when the industries that use clean, renewable sources of energy are the future we should be working toward.
Response: Comment acknowledged.	
Kemp, Karen	Haven't we learned our lesson from the Exxon disaster?? And still trying to recover from THAT!
Response: Comment acknowledged.	
Kent, Patricia	I frequently visit the Grays Harbor, Washington, area and would be greatly saddened to see costal birds and other wildlife threatened by oil terminals. We need to find different places and different ways to supply our energy needs even if that means increased costs.
Response: Comment acknowledged.	
Kepner, Dennis & Susan	We are sure that you have heard this phrase " Canary's in the cave"? Birds are one of the first living beings that show environmental problems. We CANNOT afford to threaten their migratory habitats!
Response: Comment acknowledged.	
Kessel, sherry	The oil industry is once again attempting to put its interests first and foremost before those of habitats for wildlife. What else is new? This time it's Grays Harbor that will be at the receiving end of their inconsideration and reckless actions should the Department of Ecology and the City of Hoquiam allow them to implement their proposed plans. Please be the responsible voice of our nation's irreplaceable wildlife. In fact, should these projects be allowed to proceed; it is a given that several endangered species protected under the Endangered Species Act would be in harms way. Let's do right by them for our generation and future generations. Let's not risk their potential extinction which surely would be achieved in the event of just one oil spill. The Washington Department of Fish and Wildlife research maintains that this pristine area is presently helping to maintain the Pacific population of the Red Knot, which uses the North Bay of Grays Harbor as a critical refueling site when it migrates from Mexico to Alaska where it has its breeding grounds. Think about the end result of just one oil spill on these birds. They won't be able to survive. Plus, there's the issue of the toxic chemical releases as well as oil leaks. Both will have a simply horrific effect on endangered salmon and other small fish that are the mainstay of food for the birds. Please seek clean energy needs in Washington state by saying no to Westway and Imperium Oil. Let's face it, moving forward with clean energy trumps moving backwards to embrace filthy oil and coal projects any day of the week. Please err on the side of protecting our environment rather than risking destroying it. Thank you for the indulgence of reading my long letter.
Response: See Response to FL1-1.	
Keyes, Kathryn	"The greatness of a nation and its moral progress can be judged by the way its animals are treated." Mahatma Gandhi. We need to step up and be great.
Response: Comment acknowledged.	

Khalsa, Mha Atma S	As a concerned US citizen and taxpayer it is very clear to me that the findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor show that the risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife could be significant.
Response: Refer to the Master Response for the Purpose and Focus of the EIS.	
Kicinski, Sandra	We have to stop the oil companies from ruining our natural areas for profits.
Response: Comment acknowledged.	
Kifer, L	No more oil spills-
Response: Comment acknowledged.	
Kilner, Kevin	This is a plea for your children, as well as all those and their children who live near or next to the proposed oil terminals. Please consider strongly the following -
Response: Comment acknowledged.	
Kimball, Larry	This does nothing for our energy "needs", this oil would go to China. If we are going to do something about climate change this is another good place to start...do not allow Washington to be a part of the ongoing tragedy of climate change. Do no allow Washington to aid and abet the probable destruction of a so important estuary.
Response: Comment acknowledged.	
Kimberly, and Mrs. George	The survival of our entire planet may depend on moving away from coal and oil to safe, renewable, and clean energy solutions. My husband and I support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Kimsey, Rebecca	Birds are already under assault by human population effects on their habitat, climate change which affects food source. They need our help, and instead the idea is to put them under further assault with industrial terminals which will only add to their stress.
Response: See Response to FL1-1.	
King, Janis	We cannot afford to lose another species. We must learn to put them first and live in harmony. "We can judge the heart of a man by his treatment of animals." Immanuel Kant
Response: Comment acknowledged.	
Kirchoff, Amy	The environmental damage from building the oil ports would be catastrophic.
Response: Comment acknowledged.	
Kirschbaum, Saran	The words to this song "When will they ever learn?" is appropriate for even considering an action such as this.
Response: Comment acknowledged.	
Kist, Rosemary	The increased dangers to Hoquiam and the surrounding areas, particularly in the form of water contamination and train explosions just aren't worth the risk.
Response: Comment acknowledged.	
Klapstein, Annette	This would be a huge threat to the health and safety of the entire human population of Grays Harbor County - and every single county that these bomb trains pass through! Due to these numerous and enormous risks, I ask that you reject the Westway and Imperium oil terminal proposals. If you don't care about human beings, perhaps you care about birds and other wildlife?
Response: Comment acknowledged.	
Klemke, Lloyd	We just returned from a week vacation at ocean shores . It is very easy to see how vulnerable this low and interesting ecological area this is we would hate to see it spoiled!
Response: Comment acknowledged.	
Kline-Claussen, Deborah	My husband, Ken, and I are active birdwatchers and he is a graduate in Marine Biology. We have become aware of the following findings in the DEISs for Westway and Imperium oil terminal proposals ……
Response: Comment acknowledged.	
Knanishu, Nina	We all need to STOP hurting BIRDS a b d consider that we share this Earth with other non-species. WE ARE NOT ALONE!!

Response: Comment acknowledged.	
Knowlton, Lindsay	Please do your very best to Protect Grays Harbor for the sake of all of the above. Thank you!
Response: Comment acknowledged.	
Kohn, Deborah	I write to register my objection to the Westway and Imperium oil terminal proposals. We need to pursue alternative, renewable, environmentally-sustainable energy sources, not expand the infrastructure for handling fossil fuels.
Response: Comment acknowledged.	
Koper, Marie	It's just common sense! The external costs of fossil fuels make it an antiquated, dangerous fuel source that we cannot afford. Do the right thing for a livable world. We can have plentiful, clean, renewable energy AND a beautiful living environment that protects people and the incredibly complex biodiversity that supports us without threatening the economy. Please check out http://citizensclimatelobby.org/remi-report/#Overview. British Columbia is thriving with a similar plan. Hoquiam is my husband's beloved childhood home. We love to visit it. Please protect it for your grandchildren and mine.
Response: Comment acknowledged.	
Korn, Meryle A.	Please reject this project.
Response: Comment acknowledged.	
Krag, Sharon	Please help protect the species of Red Knots in the Pacific Flyway! This is just one bird species that depends on a fragile ecosystem, that we need to protect.
Response: See Response to FL1-1.	
Krakowiak, Sandra	We don't need this, no more spills and toxic waters! Lets just say no and help these endangered species survive.
Response: Comment acknowledged.	
Krause, Diane	We know that ocean shoreline habitat is critical for migrating birds...it is a life and death situation as they move along the coast. We know that Americans love their oceans/shorelines and wildlife.
Response: Comment acknowledged.	
Krininger, Kerry	Please use wisdom! Do not be deceived by money interest.
Response: Comment acknowledged.	
Kurie, Edith	This tiny bird is a true fighter. It has managed to get off the endangered list before. It deserves to have whatever it needs to survive, especially Grays Harbor.
Response: Comment acknowledged.	
L, Judy	There hasn't been a sure fire clean up response for damaging spills, so why do we continue to allow these lying energy companies to continue their destruction on our planet? Hell, they don't even pay for all the damage done, the taxpayers do, i.e. spills; extreme weather catastrophes; fires/floods, etc.
Response: Comment acknowledged.	
La Pere, Candice	Please say no. Washington is beautiful state of so much riches to risk harming, so many ways to dirty your communities. Thank you.
Response: Comment acknowledged.	
Laine, Joyce	Off shore drilling is a travesty .Haven't you learned from past spillages that this is an accident waiting to happen. OPEN YOUR EYES AND YOUR HEART AND DO THE RIGHT THING!!
Response: Comment acknowledged.	
Lajeunesse, Paul	The people of this country do not want environmental protection to happen only when convenient! We want environmental protection to be first and foremost the number one priority. DO NO HARM!. We need to be moving away from fossil fuels as a nation and certainly not exporting it to other countries so they can spew our carbon.
Response: Comment acknowledged.	
Lambeth, Larry	Oil terminals spill oil and oil spills would be devastating in Grays Harbor.
Response: Comment acknowledged.	

Lamken, Nola	Crude oil in Gray's Harbor? How crude! Estuaries have been rampantly destroyed in the last century, yet they have provided essential habitat for thousands of years. There is NO WAY there's not going to be oil spilled, and any small amount will kill off this essential resource. Please do not wait until oil is completely outdated. We must put our own country's interests ahead of loose profits from elsewhere. Get some sense of respect and guard what little we have left!
Response: Comment acknowledged.	
Landy, Gail	Birds are already challenged by climate change and habitat loss. An oil spill would devastate this critical migration site., and wipe out the salmon that provide subsistence for the birds.
Response: Comment acknowledged.	
Lantry, Gavin	Enough is enough ! Ecocide has gone far to long and now it's time to make the right decision to protect what little remains. Green and clean is our only chance to keep the planet livable for us humans...
Response: Comment acknowledged.	
Larson, Janet	I love birds and think they are an important part of the world we live in. I support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals. Please!
Response: Comment acknowledged.	
Lawler, Kim	Surely tourism and saving vital habitat is more important than these oil terminals!
Response: Comment acknowledged.	
Lawson, Ken	Any oil development in this precious area impacts the entire area! Don't let the oil companies sell their agenda and get another opportunity to really screw things up!
Response: Comment acknowledged.	
Layton, Jean	PLEASE THINK>> SO GO THE BIRDS NO MORE OIL/COAL/FRACKING JUST THINK WHAT YOUR CHILDREN WILL LOOK AT.. IF ALL IS DESTROYED BY OIL .. THINK PLEASE .
Response: Comment acknowledged.	
Lazell, James	I am a professional biologist with a long career invested in conservation.
Response: Comment acknowledged.	
LeBeau, Barry	In my opinion, increasing burning of fossil fuels should be reduced by judiciously switching to renewables like wind and solar will make our climate safer and protect the Environment we truly love and enjoy with our families and children. We must set the right example for their future too by resetting the course away from dirty fossil fuels and leaving it in the ground before things get worse.
Response: Comment acknowledged.	
Lee, Brenda	We can't continue to destroy and pollute our environment and expect everything to be ok! Our reliance on fossil fuels is becoming less as we transition towards a cleaner energy future and the scientists agree that we need to continue on that path to mitigate the consequences of inaction with regards to climate change. We should no longer continue to do business as usual. Building more infrastructure for yesterday's energy would be moving in the wrong direction and we can no longer afford to do that! The future of our planet and what we are leaving for the next generation to deal with can be a much brighter future. Right now we are not doing so well. Don't allow the greed of a few destroy this planet we all call home.
Response: Comment acknowledged.	
Lefko, Gary	Must the birds always take a back seat to money and jobs? Enough already-balance approached.
Response: Comment acknowledged.	
Leines, Lee	As a former resident, a frequent visitor, and now parent of college student residing in Washington, I am appreciative of the spectacular beauty of the Sate of Washington and a proponent of its safekeeping.
Response: Comment acknowledged.	
Leland, Lora	One oil spill or accident in Grays Harbor could wipe out a significant portion of the Red Knot population in the Pacific Flyway. Birds, marine life of all kinds, and wildlife of all kinds are under threat of oil spills if you do not reject the Westwasy and Imperium oil terminal.
Response: See Response to FL1-1.	

Lenway, Linda	We need to take care of all creatures that don't have a voting voice, let's not lose more animals to extinction like we have in the past.
Response: Comment acknowledged.	
Lettieri, Tammy	Oil leaks and polluted environments are all but guaranteed to happen! And most of the damage to environment and life is irreversible.
Response: Comment acknowledged.	
LeVay, Kianna	Why should the citizens of the United States, our fragile coastal lands, and our precious wildlife suffer for the greed of corporations who want to sell toxic petroleum products to China?
Response: Comment acknowledged.	
Leven, Marie	That oil needs to stay in the ground! No drilling on our land so big oil can pollute our environment!
Response: Comment acknowledged.	
Leven, Marie	Our environment is more important than an oil terminal! So this oil is going to Asia and be burned and because the wind blows East we get all the pollution. What a disgusting idea! Leave the oil in the ground and invest in clean energy!
Response: Comment acknowledged.	
Lewis, Joyce	I was born & raised in Aberdeen. Moved to Grayland as a teen & spent all my free time riding my horse on the beach. Dug clams every day....no red tide, no beach closures. Adding the threat of an oil spill to my beloved beaches is NOT ACCEPTABLE!!!
Response: Comment acknowledged.	
Lewis, William	There is little need to continue the way things have been done over the years and the wildlife will prosper for all to see and enjoy!
Response: Comment acknowledged.	
Liedtke, Harriet	The red knots and others have chosen to live in Gray's Harbor area. Leave them alone. As humans overpopulate the earth, more and more other species are squeezed out. As this is our inevitable evolutionary fate to kill everything else then go extinct ourselves, we need to intervene to keep our planet as is for as long as possible. Let's keep the estuary free of risk. Build elsewhere.
Response: Comment acknowledged.	
Linn, Karen	Wildlife needs pristine habitat to survive. We are hopefully weaning our country from massive oil use. Don't make a huge mistake!!
Response: Comment acknowledged.	
Lippert, Connie	Some things you can never get back. We have already lost so much. Don't add this area to the list, please.
Response: Comment acknowledged.	
Livingston, Beth	Imagine a world without the songs of birds that fill our hearts with happiness. That's what is unfolding unless YOU stand up.
Response: Comment acknowledged.	
LoCicero, Robert	God's creatures have a part in our earthly world too so let's consider helping them survive. Not just adding to the windfalls of greedy corporations.
Response: Comment acknowledged.	
Long-Fainter, Lynda	I not only oppose drilling in the Pacific, but my mother's family lives in North Carolina. I am also opposed to drilling for oil in the Atlantic Ocean as well! When I go home to visit my family, I want to know that the beaches of Wrightsville Beach, NC will be there for me to spend my vacations with NO oil spills that would definitely destroy the coast- line and the fish and birds as well. Oil for China????????????? No wonder our gasoline is high. The oil companies are giving it away at my expense -- WELL THAT SUCKS! Well, Governor Inslee, are you paying attention with regard to "all of the negatives" of drilling in Washington State? I certainly hope so for your sake and the sake of all the people in Washington! Here's a tip for you -- you better start paying attention to Prophecies. . .take a hint of what can happen! Do you people care what damage the oil companies cause to people, wildlife and fish???
Response: Comment acknowledged.	
Loosen, Charles	As a Washington native now living in Texas I was shocked to learn of a proposal to develop an oil terminal in Grays Harbor where my family presently lives.

Response: Comment acknowledged.	
Lovelace, John	I have visited Grays Harbor and the surrounding area. I realize harbors are needed for our country. My problem is that we always end up doing these things on the cheap. Then after a disaster we think up ways the disaster could have been prevented. Sadly, the environment is now damaged for decades if not century's to come. I am not against some development, I am against greed and stupid.
Response: Comment acknowledged.	
Lowell, Nancy	So, nothing new there. Essentially anywhere near the water that you mess around with oil transport everyone and everything in the area risks poisoning, contamination, and sometimes fatalities.
Response: Comment acknowledged.	
Lucas-Haji, Geraldine	These are increasingly perilous times for birds; night light across our continent disturb migration patterns, pesticides and herbicides have invaded our streams , rivers and swamps, and birds particularly migrating ones going the long route to Alaska should be cared for if only protection of not-drilling for oil, railroading oil and trafficking with terminals for oil in important migratory paths used as stop overs. On a state level, stand up for these paths! Have the strength to do the right thing.
Response: Comment acknowledged.	
Luck, Diane	The risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife are too high. Waterway contamination, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings are also of grave concern. Please reject the Westway and Imperium oil terminal proposals. An almost inevitable oil spill would have devastating effects on the environment.
Response: Refer to the Master Response for the Purpose and Focus of the EIS.	
Luczyski, Richard	The future is before us all even the birds. If the oil industry takes out the least of creation then soon after we the human race will follow. We need to be good stewards of this one and only planet that we all share. Don't do the wrong thing this time, move forward with tomorrows solutions.
Response: Comment acknowledged.	
Luedeke, Amy	I do hope an alternative can be investigated and found! Certainly as a follower of Jesus Christ, I do value people and their needs over birds; however, the earth and all that is in it is our responsibility and in our care...God mandated. And, ultimately, in the end we humans face the consequences of adverse environmental impacts to nature.
Response: Comment acknowledged.	
Lyon, Ruth H.	If oil spills occur in Grays Harbor it will be very difficult to keep that oil from harming shore - dwelling and marine animals and plants there. Grays Harbor is an important estuary habitat for both migrating birds as well as year-round birds native to the region. We cannot risk despoiling this important wildlife area. Several endangered species make use of this area. Thus I hope you will reject the oil terminal proposals there. As a nation we need to transition to cleaner, renewable energy. This will benefit future generations of humans and other species.
Response: See Response to FL1-1.	
Lytle, Rebecca	Until the big oil bozos can figure out how to stop spilling the stuff all over hell and creation, and until they finally decide to get up off the money it takes to maintain their equipment and infrastructure correctly, they shouldn't be given the opportunity to yuck up more of the world than they already have. THINK!!!
Response: Comment acknowledged.	
M., F.	ONCE THE WILDERNESS IS GONE, HUMAN LIFE WILL BE FOREVER DIMINISHED.
Response: Comment acknowledged.	
MacDonald, Kathleen	PLEASE: INVEST IN PROTECTING THE ENVIRONMENT - INVEST IN RENEWABLE ENERGY SOURCES, not the proven destructive production of fossil fuels.
Response: Comment acknowledged.	
Maceri, Antoinette	PLEASE PROTECT THE ANIMALS, WILDLIFE. THE ENVIRONMENTS!
Response: Comment acknowledged.	
Mack, Theodore	Thousands of people go to Grays Harbor to see the shorebirds. This is an extremely basic historic staging area for our shorebirds. The people who come to Grays Harbor from as far away as I do here in New York and even much further afield spend money on car rentals, food, and motels. These are

	the peoples' birds. Selling oil to China is not proper use of North American oil reserves. The oil will be gone or no longer shipped to China when the Chinese dragon awakes and growls toward the West. Please do not oil Grays harbor.
Response: See Response to FL1-1.	
MacNeil, Chris	Please keep wildlife alive....I don't want my grandson having to visit these birds in a museum because the greed made them extinct!
Response: Comment acknowledged.	
MacRaith, Bonnie	Gray Grays Harbor a site visited by hundreds of thousands of migrating shorebirds every years. It is a critical spring migration stop over for Red Knots in the Pacific Flyway. Please reject the Westway and Imperium oil terminal proposals!
Response: See Response to FL1-1.	
Madison-Kennedy, Jessika	The risk to migrating shorebirds is too high if the proposed oil terminals are allowed to be put in critical habitat. The effects if even one spill to occur (and they do...) could be devastating for many species, and even more importantly, the precious ecosystems in our already tortured oceans. Please do not allow this to proceed for the sake of the wildlife, our ecosystem, and for all of us.
Response: Comment acknowledged.	
Magasich, Philip	Every new oil spill proves that the industry is not prepared for a fast respnse to a oil spill. Every time!
Response: Comment acknowledged.	
Magee, C. Sharyn	Protecting biodiversity is the most important act we can take to insure our children a world worth inheriting.
Response: Comment acknowledged.	
Mahan, Connie	Though I live in Virginia, I am writing about an issue that I believe is important to all of us -- oil development in and around Grays Harbor and the impact a spill could have on important Pacific migratory birds.
Response: Comment acknowledged.	
Mallon, Anne-Marie	It's time to put the future of the earth and all its inhabitants above the interests of corporate futures.
Response: Comment acknowledged.	
Malone, Mary Franceline	Let's not perpetuate building infrastructure for yesterday's energy when there are better ways to meet our energy needs. Washington state should create yet more safe, renewable clean energy solutions that protect our fragile environment for future living creatures -- including humankind.
Response: Comment acknowledged.	
Maloney, Angie	Please look at the future of your area, and how this decision will impact the ecology of your area and thus coming generations of residents.
Response: Comment acknowledged.	
Malven, Tania	No oil pollution in Greys Harbor!!! KEEP IT IN THE GROUND!!!!!!!!!!!!!!!!!
Response: Comment acknowledged.	
Margulies, Margaret	I don't know, try as I might I don't think I could make one of those birds.
Response: Comment acknowledged.	
Markus, Mary	I HOPE THESE BEAUTIFUL BIRDS ARE STILL THERE WHEN I VISIT MY KIDS IN WASHINGTON.
Response: Comment acknowledged.	
Marone, Susan	Its time to end the damage
Response: Comment acknowledged.	
Marquardt, Michael	Oil is a 20th century energy source; this dependence has got to stop, especially when there are clean, renewable substitutes.
Response: Comment acknowledged.	
Mars, Rebecca	I was born and raised in Aberdeen. It has taken much effort to clean up the egregious mess to the environment due to logging and processing for years. Chemicals spewed into the air with no concern of public safety . I know as I smelled the foul odors for years. Finally some constraints were

	made but the beautiful waters and land has suffered greatly. Now this is just another assault on its land. Why do energy companies infiltrate communities that are poor and heavily burdened with unemployment find these kind of places to make their money?Go to king county where more regulatory manpower for oversight is possible or better yet rely on renewables I recently attended a class reunion and found it horrifying that so many of my classmates had cancer or died from it. The statistic show an inordinate amount of cancer in the community. I am convinced it is due in part to the chemicals from Weyerhaeuser and the other plants over the years Please deny permits
Response: Comment acknowledged.	
Marshall, Leslie	Furthermore, and very significant, is the danger of the terminal storage and connections being ripped open in the increasingly likely event of a major earthquake, spilling massive amounts of fuel with subsequent explosions and widespread fire. Given disasters we have witnessed in recent years in Indonesia, Chile and Japan (like us, on the Pacific Rim of Fire), it seems sheer folly to build any fuel terminals anywhere on the North American coastline! As for our non-human neighbors, recent research .....
Response: Comment acknowledged.	
Martin, Robert	Our history gives us ample warning that we cannot prevent oil spills no matter how much we talk. Sooner or later errors will be made and we will have a disaster on our hands. Thousands of our fellow creatures will die. Only caring humans can prevent this. Be a caring human and save our future with these creatures. Thank you.
Response: Comment acknowledged.	
Martinez, Melissa	Action needs to be taken now to prevent further losd of avian species!
Response: Comment acknowledged.	
Martucci, Marilyn	Now is the time to take a stand to preserve and conserve what is left of this vital area's ecosystem. I therefore request that you reject the Westway and Imperium oil terminal proposals on account of the high number and severity of these risks, . Several species protected under the Endangered Species Act are likely to be harmed by these projects, including the Marbled Murrelet, Snowy Plover, and Streaked Horned Lark. This is not acceptable and goes against the Act. Eschewing oil and coal altogether for modern, clean energy solutions is the best way to meet our energy needs.
Response: See Response to FL1-1.	
Mason, Judy	With what we know now, it would be very foolish and disturbing to allow the terminals. For heaven's sake, do the right thing!
Response: Comment acknowledged.	
Maston, Brenda	I know that we need oil and maybe that oil will help cancel debt. But not at the cost of migratory bird populations. We can find another place for these terminals. I support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Mathes, Karen	Let the birds live. Stop the degradation. Save and appreciate rather than destroy.
Response: Comment acknowledged.	
Maxson, Ronald	The risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife could be significant according to the findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor.
Response: Comment acknowledged.	
May, Kathleen	Please do not allow oil terminals to be built in Grays Harbor. The disruption of the grounds for migratory birds will be extremely detrimental.
Response: Comment acknowledged.	
Mazeika, Rhonda	DON'T PUT A STORAGE NEAR THE WATER!
Response: Comment acknowledged.	
Mc Calmont, Jay	When did all of you politicians decide that our ecology doesn't matter as much as you lining your pockets with money and favors from special interest lobbyists? Think again.....ALL of these ANIMAL lives are MOST IMPORTANT to Your ecology and the future of this planet where you, your families,

	your children and grandchildren LIVE. IT'S GRATITUDE owing to ALL these animal lives. Vote to keep them safe and ALIVE .
Response: Comment acknowledged.	
McArtor, Robert	Just find a location for the terminal in the area of less risk to our bird population. Ignoring bird rights to life resulted in the extermination of the passenger pigeon. Profit is not the only thing is our world. The natural world must also be protected
Response: Comment acknowledged.	
McCarthy, Faith	I understand that oil means money, but the environment is depending on you to keep it going. If you decide to do such a selfish thing, numerous populations of migrating species could be largely effected. These birds are flying hundreds of miles and they deserve a place to stop on their long journey, they need a resting point. They need this for survival.
Response: Comment acknowledged.	
McCutcheon, Cynthia	We own property on Harstine Island and are interested in protecting wildlife in all areas of Washington state.
Response: Comment acknowledged.	
McGee, Dianne Dekich	AS A RESIDENT OF THE GULF COAST, I WITNESSED THE DEVASTATION OF AN OIL DISASTER FOR WILDLIFE AND FOR PEOPLE. PLEASE DON'T TAKE THIS RISK AT GRAYS HARBOR.
Response: Comment acknowledged.	
McIlhinney, Eileen	I hope you will read the following message composed by the Audubon Society and consider the grave implications of a possible (likely) accident occuring at Grays Harbor.
Response: Comment acknowledged.	
McKain, Joshua	People, animals, and the environment over profits...for the few!
Response: Comment acknowledged.	
McKee, Sarah	The oil in question is slated for export. Thus, building these terminals would offload huge loads of toxic, health-destroying pollutants in the U.S., only to benefit foreign users. How is this not a raw deal for Americans.
Response: Comment acknowledged.	
McKee, Wendy	It's devastating enough that the burning of gas and oil is causing the earth to lose habitat for existing species. We must stop the pipeline that moves these substances to market.
Response: Comment acknowledged.	
McManus, Anne	It's time to end the use of oil. Please oppose this dangerous request.
Response: Comment acknowledged.	
McMillen, Marie	We CANNOT continue to destroy areas for our own personal wants and assumed needs. To do so is to lead to extinction of animals, birds, plants, all waters and MAN!
Response: Comment acknowledged.	
McWilliams, Cynthia	Even those of us who just watch the news every day see that oil and its slug can slip out through damaged or decayed pipes even if the drilling operations are safe. Thank you for caring for our fragile environment, which, for the most part, is struggling due to our lack of concern for it.
Response: Comment acknowledged.	
Meade, John	Stop profits over the environment or people mindset - we have one world, and we share it with many other species. Oil is part of the problem, not part of the solution.
Response: Comment acknowledged.	
Meadows, Justin	Hello, Obviously I've used a form letter here from the Audobon to give support to stopping oil development, but this is an important matter to me as a WA resident. The environment, birds, animals, air and water quality are supremely more important to me than industrial development and I don't want to risk beautiful Washington shores and birds for ugly, nasty, oil terminals. Please stop them.
Response: Comment acknowledged.	
Meeks, Mark	Grays Harbor is a site that warrants strong, sustained commitment to preserve its natural qualities and thus all the wildlife dependent upon that. We must more critically face the profound destructive character of fossil fuel development, transport and use. It is a cause of harm from access to use, and

	that simply can no longer be allowed. While we have built up a civilization through an energy economy that does harm, we've definitely reached the place where the harm now threatens to overwhelm everything we've built, and many things on which we've been dependent in addition to energy. Now we have other means of sustaining our energy economy, means for more compatible with our whole earth. Now is the time to close doors on the past and open them more widely to a viable, clean, renewable future.
Response: Comment acknowledged.	
Mehis, Jim	the OIL needs to stay in the ground.
Response: Comment acknowledged.	
Meijer, Kristin	Why not leave fossil fuels in the ground as The Guardian newspaper as suggested? We could grow more green jobs as President Obama paid half of my Energy management degree to help people fix our leaky Puget Sound areas buildings. I and nearly 300 other students got these degrees, but people do not take us help to help and elders on fix incomes can get an energy audit nearly free if file for help. Or Why don't you include the higher medical bills to the coal companies because the coal trains cars are not covered? Why aren't the people getting the rights to clean air and water instead of certain companies just get to make money?
Response: Comment acknowledged.	
Melin, Nancy	It is 100% guaranteed that there WILL be oil spills. Please do not allow drilling, and support the wildlife flyway habitat.
Response: Comment acknowledged.	
Mendoza, Helen	EXTINCT IS FOREVER
Response: Comment acknowledged.	
Michel, Diane	Protection of Grays Point from the inevitable risk of oil spills is of permanent, international importance to the survival of very many species of birdlife. In addition, rejection of the terminal proposals will be an enormous advantage to all species including ours. The reputation of the Department of Ecology, the City of Hoquiam and individuals involved in the Grays Harbor decisions will all be the better for a show of courage on this issue.
Response: Comment acknowledged.	
Mickelsen, Patti	As a former resident of Washington State, I know how beautiful it is in our NW. It is shocking that this proposal should even be under consideration. We should be rapidly moving away from the polluting and environmentally disastrous oil industry, and sending all our support to forward thinking alternative energy suppliers. Stand up for the animals of your state, and the people too! Other types of energy are better for us all.
Response: Comment acknowledged.	
Miller, Barb	THIS IS UNACCEPTABLE. PLEASE CARE ENOUGH TO SAVE THESE BIRDS FROM DEATH. THEY DESERVE BETTER. THANK YOU.
Response: Comment acknowledged.	
Miller, Heather	We must care for other species - it is the only ethical and biologically sound approach. We cannot let short sightedness and short term interests govern our action.
Response: Comment acknowledged.	
Mischenko, Stephen	Are oil profits really worth the potential cost to this fragile ecosystem?
Response: Comment acknowledged.	
Moench, Belinda	I let Audubon speak for me on this, but there have been too many similar accidents, and it would be another catastrophe for our wildlife, not just birds, if there were an oil spill. Thank you.
Response: Comment acknowledged.	
Mohr, Carole	We know from experience how damaging an oil spill can be to the environment.
Response: Comment acknowledged.	
Mooney, Marianne	My husband and I are birders and enjoyed visiting Grays Harbor, which is an amazing birding site. It draws not only birds, but lots of birders who contribute to the local economy--a much better option for economic growth than expanding oil-holding capacity.

Response: See Response to FL1-1.	
Moor, Sarah	Our future and our children's future and generations to come depend on the thoughtful decisions and actions we take today. Thank you Sarah Moor
Response: Comment acknowledged.	
Moore, Nancy	Habitat protection is critical to preserving our rich species diversity. Estuaries are not suitable locations for building crude oil terminals. We need to STOP being so self-centered and consider the greater picture of habitat protection. We are moving towards alternative energy and we cannot possibly recreate the habitat that could be impacted, so please do not build this terminal. Be creative with existing infrastructures.
Response: Comment acknowledged.	
Moore, Kathryn	Human life would also be affected .
Response: Comment acknowledged.	
moore, s	Big oil's days are almost over-
Response: Comment acknowledged.	
Moran, J J	I love Washington and keep an eye on this progressive state.
Response: Comment acknowledged.	
Morello, Phyl	Protect environment...NOT big business!
Response: Comment acknowledged.	
Morgan, Margie	The Red Knot faces grave problems on the East Coast of the US as well, as their invaluable stopover in the Chesapeake Bay where they fill up on Horseshoe Crab eggs for the rest of their long migration is threatened by overfishing of the eggs.
Response: Comment acknowledged.	
Morgan, Sharon	Please use sound science in all decisions involving environment.
Response: Comment acknowledged.	
Moritz, Dorothy	NO MORE OIL TRAINS!!!
Response: Comment acknowledged.	
Morrison, Abi	I have experienced the awesome fecundity of Puget Sound and am dismayed by the prospect of further gas and oil development.
Response: Comment acknowledged.	
Morseth, Wendy	Having been to Grays Harbor several times with family to whiteness the migration,
Response: Comment acknowledged.	
Mosher, Susan	I also support the continuation of species on this planet. We need to very actively pursue cleaner energy sources. Not Fossil Fuels
Response: Comment acknowledged.	
Moyer, Diane	I VERY STRONGLY SUPPORT ANY AND ALL ACTIONS TOWARD COMPLETE RELIANCE ON SOURCES OF CLEAN ENERGY.
Response: Comment acknowledged.	
Mrozek, Barbara	Haven't we learned anything from Valdez or Louisiana coast spills as to the danger of oil spillage? Let's stop the continuous destruction of nature and our wildlife. Please!
Response: Comment acknowledged.	
Mullen, Cindy	Why do we always think that there will never be another oil spill? There will always be another one as long as we continue our reliance on oil.
Response: Comment acknowledged.	
Murman, Anita	We must look at the evidence --
Response: Comment acknowledged.	

Murphy Larronde, Suzanne	It is our moral obligation to protect these sea creatures.
Response: Comment acknowledged.	
Murphy, Maureen	I ask that you reject the Westway and Imperium oil terminal proposals. ALL of creation is important to "the whole" and each has a part to play. PLEASE protect Grays Harbor and the birds who would suffer if the oil industry expands its operations in that area. PLEASE look at the BIG picture when making decisions - and the various consequences of those decisions. THANK YOU.
Response: Refer to the Master Response for Purpose and Focus of th EIS.	
Murphy, Timothy	No matter how careful one is with environmental precautions, inevitable a mistake will occur, petroleum will be released and the ecosystem will suffer. Oil needs export through areas of lesser environmental sensitivity.
Response: Comment acknowledged.	
Myers, Sandie	There are just as many ways to gain economic improvement through tourism What about all of the new housing projects on the beach front? How do those folks feel about having their investments ruined by this type of expansion?
Response: Comment acknowledged.	
Nagy, Karen	The risk is too great. Sooner or later an accident will happen and you will wonder why in the world this terminal was ever allowed. We need to be moving away from fossil fuels!
Response: Comment acknowledged.	
Naiman, Shoshanah	I am writing to you because I am concerned about the risk of an oil spill in Gray's Harbor. The risk of oil spills is a constant threat to wildlife because no matter how much care is put into a project, humans and machinery are infallible and the resulting damage is always horrific.
Response: Comment acknowledged.	
Narbutovskih, Paula	We need our wildlife a lot more than we need more fossil fuels. No more drilling in any coastal waters.
Response: Comment acknowledged.	
Neff, Grace	Birds are more important in the long run than oil and gas ever will be. If we lose our Birds from bad decisions made by those more interested in income than the welfare of humans everyone will pay.
Response: Comment acknowledged.	
Ness, Laurie	Due to numerous and high risks, and the likelyhood an accident WILL happen, I ask that you reject the Westway and Imperium oil terminal proposals. GEach year, we attend a shorebird festival put on by the community and just love it! We will no longer come if these projects go through. There will be no point.
Response: Comment acknowledged.	
Neuendorf, Mary	This is no time to experiment with risky projects. Once done, there is no way to remedy the impacts.
Response: Comment acknowledged.	
Neuman, Michael	Due to the enormous environmental degradation and very real risk of an oil spill occurring at the proposed Westway and Imperium oil terminals, and the significant negative impacts that would result to marine habitat, wildlife, the economy and the people who who care about our environment, and the fact that such monumental damages to our natural resources could never be adequately mitigated, I therefore respectfully request and plead that the Washington Department of Ecology and the City of Hoquiam not allow the development of these economically and environmentally unwise crude oil terminals in Grays Harbor. Enabling and relying on the burning of fossil fuels as a way to satisfy society's energy needs in this day and age of global warming and harmful climate change is dangerously wrong and unethical, especially in light of the fact that today's youth and future children, everywhere, will have no choice but to live on a planet that is being increasingly made less livable and ultimately not survivable by those of us living today, who are continuing to rely on the burning of fossil fuels to an excess in practically everything we do (driving, flying, using electricity derived from fuel burning, heating our homes, businesses and institutions via burning fossil and other fuels), and by doing so, causing irreversible harm to the atmosphere, oceans, wildlife and landscape. Because of these reasons, I strongly support the protection of Grays Harbor.....

Response: Comment acknowledged.	
Newcombe, Patrick	We must learn from our mistakes after past oil spills-- and NOT risk the destruction of Grays Harbor.
Response: Comment acknowledged.	
Newman, Donna	Would YOU want to have to drink oil-contaminated water? Would you want to have to LIVE in it? Don't sentence the birds to that!
Response: Comment acknowledged.	
Niblack, Anna	Time after time we have experienced oil spills in our major waterways both fresh and saltwater. While there are "clean-ups" these at best limit additional damage but don't undo the damage that will be seen and experienced for many years to come. What these "clean-ups" and the subsequent media coverage of them do is cynically soothe the anxiety of those people concerned about the spill who might protest if they actually saw the damage done despite the clean-ups. More and more we are finding these spill sites fenced off and kept from the view of the media and the public to sanitize the image of the oil companies. In spite of efforts to keep the reality from the public, the findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor show that the risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife could be significant.
Response: Comment acknowledged.	
Nichols, Paul	Please help protect our environment and us!
Response: Comment acknowledged.	
Nicolaidis, Judith	Birds are important to me and many millions of Americans. I have taken many steps to reduce my carbon footprint. Please encourage this instead of more use of fossil fuels. Protect birds AND humans!
Response: Comment acknowledged.	
Norlander, Peter	My name is Peter Norlander and I urge you to regect the Oil Terminals for the good for all our children.
Response: Comment acknowledged.	
Nowe, Connie	"When will they stop this? Look back at what happened in the Gulf in FL, when BP spewed OIL more than a million gals. Much of the sea life died This has to be stopped, once again...What's more important to you, money or life, whether it be animal, sea life, or birds? Just remember, you can't take it with you, nor cash any checks, once gone...How about spreading the wealth around instead spreading the "OIL!"
Response: Comment acknowledged.	
Oaks, Phoebe	I join many other Americans in writing to urge you to please reject the development of any new oil terminal. We cannot afford to further contribute to climate change and the endangerment of threatened wildlife. In this case, vulnerable shorebirds would be at risk.
Response: Comment acknowledged.	
Oborn, Roger	Lets get off Fossil fuels before it kills us...
Response: Comment acknowledged.	
O'Brien, Mary	I know that oil trains, particularly fracked oil trains, are environmental disasters waiting to happen. Remember the terrible accident in Quebec? It was big news for several days. Similarly, in addition to oil and gas, trains that carry munitions are also a major risk and can cause devastating explosions. Look at what happened in several incidents at the Roseville, California rail yards, for example. Evacuations of local residents had to be done due to exploding ordnance and potentially exploding ordnance on trains and found buried near trains. It was big news. I remember specifically that one of those accidents occurred in the spring of '73 or '74. I was in the Sacramento Youth Symphony Orchestra at the time, and we were doing a concert during the evacuation period, and one of our cellists had to borrow a cello for the concert, because she'd left her cello behind when she was evacuated. That incident stuck in my mind, and I remember it 40 years later. You don't need to build terminals for a dying oil industry. Fossil fuels must be phased out. Instead, join the wave of the future and embrace the safe, clean, sustainable sources of energy that will power our future. You can build your economy on that and not hurt the planet in the process. Climate change must be stopped. Thank you.
Response: Comment acknowledged.	

O'Connor, Terry	Oil terminals in Grays Harbor are a bad idea for people and wildlife. Any economic gain to your area is far outweighed by the consequences of an environmental disaster or train derailment, both of which are not without precedence.
Response: Comment acknowledged.	
Ocskai, Barbara	Leave it in the ground!
Response: Comment acknowledged.	
Oeller, S	Have we not paid attention? Learned our lessons? Being proactive means to prevent future oil spills from happening, i.e. minimizing their threats by minimizing oil as an energy source. Less platforms, less terminals, less wells, less transport!
Response: Comment acknowledged.	
Ogilvie, Marsha	Please save our birds!
Response: Comment acknowledged.	
Ohbeg, Erik	I just recently returned from a trip to the Olympic Peninsula. I have great memories of the trip and would like to think that the beautiful harbor will continue to thrive.
Response: Comment acknowledged.	
Oleyar, Maureen	Hopefully, Washington State will join my state of California in looking toward the future and dealing with clean and safe renewable energy sources instead of oil and coal. Grays Harbor is too vital a stop on the Pacific Flyway to risk endangering the thousands of birds that stop there during migration. I'm sure you do not want Grays Harbor subjected to the possibilities of oil spill as occurred in Alaska and the Gulf Coast. PLEASE reject the Imperium and Westway oil terminal proposals.
Response: See Response to FL1-1.	
Olmsted, Jean	Reject the oil proposals before the possible damage is done. Don't wait.
Response: Comment acknowledged.	
Olsen, Corey E.	Building more infrastructure for yesterday's dirty, dangerous and deadly energy would be moving in the wrong direction.
Response: Comment acknowledged.	
Olson, Diane	ALL AROUND THE WORLD WE SHOULD PROTECT NATURAL SITES AND BREEDING GROUNDS FOR WILDLIFE. IT IS ESSENTIAL THAT WE PROTECT THESE PLACES NOT ONLY FOR WILDLIFE BUT FOR OURSELVES.
Response: Comment acknowledged.	
Orgel, Linda	Our economy in Grays Harbor depends on clean water and a healthy estuary.
Response: Comment acknowledged.	
Osborne, Esther	As a former resident of Hoquiam and owner of an Oyehut property, I am well aware of the desperate need for jobs in Grays Harbor--but an oil terminal may mean the extinction of an entire species, and the probable end of the migration of many species though the Harbor. This is not another "spotted owl" affair--jobs created though this enterprise will bring a short term boom during construction, followed by massive layoffs. Look at the boom and bust in Alberta--dancing with the oil industry is a dance of death.
Response: Comment acknowledged.	
O'Shea, Kathie	PLEASE. IT IS SO VITAL TO PRESERVE THIS IRREPLACABLE WILDLIFE AREA AS IT IS. EVEN THINKING OF THE HORRENDOUS DAMAGE THAT OIL IN THIS SITE WILL DO IS UNACCEPTABLE. YOU CANNOT ALLOW THE TINIEST CHANCE OF DESTRUCTION. THERE IS PROOF OF WHAT OIL DOES WHEN A SPILL HAPPENS. YOU HAVE A RESPONSIBILITY TO NATURE TO NOT ALLOW THIS PROPOSAL.
Response: Comment acknowledged.	
O'Steen, Dorothea	As this is an important migratory stopping place for migratory birds, it is important that oil terminals not be built there. Our migratory birds already face more and more challenges. For their survival and the beauty they provide to the shrinking natural world many of us find extremely important---much more important than monetary issues please rethink the location of this terminal.
Response: See Response to FL1-1.	
Paisley, Lorna	Fossil fuels are ruining our lives and our earth. Time to cut them off.
Response: Comment acknowledged.	

Palmer, Janet	We owe our children and grandchildren our best efforts to build a sustainable energy future.
Response: Comment acknowledged.	
Pankhurst, John	I would like to suggest that responsible management of our ecosystems demands that any actions undertaken do no harm.
Response: Comment acknowledged.	
Pardew, Isabelle	We need our animals!
Response: Comment acknowledged.	
Pardinek, Mary	Without the promise and action to implement safety devices, oil terminals can cause serious problems. ... Learn from evidence in LA, Valdez, etc. Do not allow crude oil to further contaminate. Safety protocols which are available are not being used.
Response: Comment acknowledged.	
Partridge, Richard	To add insult to injury this expansion will be for oil mostly earmarked for export to China. Once again corporate greed is endangering the very environment on which we and the species with whom we share this planet depend.
Response: Comment acknowledged.	
Pasqua, John	WILDLIFE FIRST NOW.
Response: Comment acknowledged.	
Passmore, Judith	And birds are not the only part of our ecoSYSTEM that will be harmed. Water quality, animals, plant life - on land and sea, are other parts at risk. I, a native of Washington State, support the protection of Grays Harbor..... Thank you in advance for wisdom, compassion, and long-range vision in this critical matter.
Response: Comment acknowledged.	
Patrick, Richanna	I think we have to have some protections in place that actually work before they have drill for oil out there. With the Middle East a mess I can understand our need for oil independence. But would be nice to have some safety things that actually work put in place. It's a horrible disaster and many deaths when things fail. I support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals if the current safety standards are as inadequate as they were in the Gulf of Mexico.
Response: Comment acknowledged.	
Paulk, Brayden	I am a seventeen year-old high school student. I am your average guy who likes College football, the outdoors, and, of course, fine chicks. But even I recognize that it is a terrible idea to let the oil industry expand like this when we know it will harm wildlife. We as humans, being the most powerful species on the planet, ARE RESPONSIBLE for the fate of these birds. I urge that we would use our head and use smart energy, and not give even more stuff to the "Great Republic of China!!!" ay and Imperium oil terminals.
Response: Comment acknowledged.	
Paxson, Elizabeh	It's time to move beyond oil.
Response: Comment acknowledged.	
Peck, Louisa	Protect the treasures of our natural world - such as Gray's Harbor - for future generations: our children's children. Don't sacrifice them for the sake of consumables, especially those that will in turn further damage the planet.
Response: Comment acknowledged.	
Peck, M	It could also involve oil spills into British Columbia, Canada's coastline and creative a huge international incident!
Response: Comment acknowledged.	
Pegg, Helen	This is a terrible idea for so many reasons, and there is no good reason to do it.
Response: Comment acknowledged.	
Pehrson, Elizabeth	I'm not very schooled on what might happen with the oil terminals being built but I ask you to use caution if it in any way will hurt the environment and the birds that rely on this Pacific Coast estuary.

Response: Comment acknowledged.	
Penn, Janie	To allow the oil terminal proposals to go forward would subject a very important ecosystem to enormous and unmitigatable risk. Building more infrastructure for yesterday's energy would be moving in the wrong direction because we know that in order to prevent catastrophic climate change, we must leave fossil fuels in the ground.
Response: Comment acknowledged.	
Peoples, Jonna	It is not if but when a catastpophic spill occurs. Why risk this devastation for an obsolete source of energy. Let us put our efforts into clean energy which is the future.
Response: Comment acknowledged.	
Perk, David	The state has failed its protective duty to its citizens by not conducting a comprehensive, state-wide assessment of ALL the proposed oil by rail facilities across Washington. Considering each proposal individually misses the forest for the trees. Poor oversight, poor governance and poor planning.
Response: Refer to the Master Responses for Connected or Similar Actions and Cumulative Impact Analysis.	
Perona, Marilyn	As a person who loves the planet I inhabit, I am concerned about the findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor.
Response: Comment acknowledged.	
Perry, Robin	We are looking to you to help protect marine life.
Response: Comment acknowledged.	
Persons, Charlotte	I am a resident of Southwest Washington, and I am sincerely alarmed by the prospect of an oil terminal in Hoquiam, especially for the potential damage caused by accidents and spills for wildlife. Grays Harbor is an especially unpolluted port, which has allowed birds and fish to thrive.
Response: See Response to FL1-1.	
Petkiewicz, Jim	As a homeowner in Friday Harbor, please do NOT do this.
Response: Comment acknowledged.	
Phreaner, Robert	I have annually participated in 16 hours IOSA oiled wildlife basic care and rescue training in Coupeville and Port Angeles. I am currently on the list of responders for Clallam Co. kept by the WA Dept of Ecology. I also have to keep current Hazwoper certification. What I have learned in my training experience is that PREVENTION is the answer to the oil spill fouling of fowl.
Response: Comment acknowledged.	
Picard, Mary	We have other options for energy, including reducing the amount we need. But, endangered species can never be brought back to life, and permanent damage to their health and ours can never be completely healed.
Response: Comment acknowledged.	
Pickell, Jeff	Please consider the bigger picture. Which would you rather save for your hildren and grandchildren to see, Birds or Lobbyists.
Response: Comment acknowledged.	
Piekarski, Virginia	What could go wrong!
Response: Comment acknowledged.	
Pierson, Julie	Please consider the the potential harm this will cause to our bird and fish population, they are suffering as it is. We can live without oil but can not live without our wildlife, it needs protection not extinction. Put your efforts toward clean energy before it's too late.
Response: See Response to FL1-1.	
Pippin-Emanuel, Patricia	PERSONAL COMMENT; It seems some people are not happy unless they are destroying our wildlife. ENOUGH IS ENOUGH!!!!!!!
Response: Comment acknowledged.	
Plover, Egret	Oil extraction, transport, export, and use contributes to climate change. There are currently cleaner, more renewable energy sources that can feed our needs.
Response: Comment acknowledged.	

Pollock, Robert and Jean	We have visited Grays harbor for birding, sightseeing and photography, and we hope to visit again.
Response: Comment acknowledged.	
Pomper, Elizabeth	Although I live on the East Coast, protecting important habitat all over the country is important to me.
Response: Comment acknowledged.	
Ponessa, Ramona	Given the track record of these projects, there WILL be spills and the clean-ups will be ineffective.
Response: Comment acknowledged.	
Poole, Diane	PLEASE DO NOT DO ANYTHING THAT WILL HARM MIGRATING BIRDS & ALL WILDLIFE!
Response: Comment acknowledged.	
Poolos, Hazel	Terminals are there to sell oil WE AMERICANS DON'T NEED but a spill could DESTROY FOREVER THE WATER, WILDLIFE, FOOD SOURCES FOR US AMERICANS.
Response: Comment acknowledged.	
Port, Clee	In all cases, ultimately public money funds the clean up from the inevitable environmental damage caused by such projects. Due to these numerous and enormous risks, and the subsequent cost to us taxpayers, I ask that you reject the Westway and Imperium oil terminal proposals. Moreover it is the government's job to protect the the biological diversity of our state for our children and our children's children.
Response: Refer to the Master Response for Liability and Responsibility for Incidents.	
Potter-Smith, M	You have a unique opportunity to do something of such great importance! Please don't give in to something as short-term as oil and greed...it's not worth it!
Response: Comment acknowledged.	
Powell, Janice	Yes, another voice. Stop ruining what nature took millions of years to create. WE DON'T HAVE THE RIGHT.
Response: Comment acknowledged.	
Powell, Shirley	The oil companies don't like to clean up after themselves. It cuts into their bottom line-profit. A leak or spill in this area will affect many species of marine animals and birds. It seems that the clean-up after a spill is left for the taxpayers to pay for. The big oil companies pay very little in taxes and a small fine doesn't hurt them. Please do not approve the proposed oil terminals.
Response: Refer to the Master Response for Liability and Responsibility for Incidents.	
Prete, Yvonne	Further mining for oil for export is not a benefit to anyone but the large corporations. I and the millions of ordinary citizens like me don't get a penny for it, and we suffer with the environment, even without the inevitable mistakes.
Response: Comment acknowledged.	
Pulliam, Shelley	This is a form letter, but I agree with what it says. *** There is too much risk involved to build these oil terminals!***
Response: Comment acknowledged.	
Puntch, Ann	This push for new infrastructure by the oil industry extends to other states, including the five refineries in the Bay Area and along down the state. If we approve these projects they will lock us into the use of extreme, dirty fuels for a generation to come at a time when we need urgent action to transition off fossil fuels. As your governor Jay Inslee famously stated, "We are the first generation to feel the effects of climate change, and the last to be able to do something about it."
Response: Comment acknowledged.	
Putnam, Lib	Think this over very carefully. Environment over temporary $$, an easy choice for me. I am not being paid by the oil companies involved. Make NO your answer. thank you.
Response: Comment acknowledged.	
Querner, Kathleen	WE MUST DO MORE TO PROTECT WILDLIFE DIVERSITY!
Response: Comment acknowledged.	
Ramirez, Sally	PLEASE... Do the right thing this time.

Response: Comment acknowledged.	
Randall, Dorene	Each of us needs to do our part to preserve the world with which we are blessed. Let us all make better decisions for the oceans and the creatures that inhabit it.
Response: Comment acknowledged.	
Rando, Nell	The potential consequences are far too threatening to support this ill-conceived proposal.
Response: Comment acknowledged.	
Ranz, Gary E.	We have so few places that support birds along the Pacific flyway that taking another could cause extinctions of some populations of migrating/nesting birds. Please consider wisely before building infrastructure For non-sustainable transportation/heating fuels.
Response: See Response to FL1-1.	
Rapp, Neville	We MUST take care of the birds before it is too late!!!!! We do NOT want he the Westway and Imperium oil terminals to be approved!!!!!!!!!!!!!
Response: Comment acknowledged.	
Rasmussen, Ross	THIS SITE IS A MUST STOP FOR BIRDING ECOTURISTS. AN OIL SPILL WOULD NEGATE BENEFITS TO BUSINESSES HOSTING BIRDERS AND NATURE LOVERS!
Response: See Response to FL1-1.	
Ratliff, Joe	I am a retired federal scientist, with a broad background in conducting and evaluating extensive environmental analyses. As both an environmental expert and ardent conservationist, I strongly support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Raven, Robert	Protect our coastline and wildlife from oil spills! Protect us from climate change!
Response: Comment acknowledged.	
Ravitts, Ricki	The short version: I live in NYC, but have visited Washington state many times. As you who live there know, it's natural wonders are a great draw and benefit for locals and visitors alike. Please help preserve Washington's natural heritage for generations of people and wildlife to come, instead of putting it at risk to enrich corporate coffers. No oil terminals for Westway or Imperium, please. Thank you. OR: The fact-filled version:
Response: Comment acknowledged.	
Ray, Rita	We all know ... if we have been awake and are listening, the dangers of oil spills. We all know that these things "happen". The findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor show that the risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife would be significant. Why take that chance? It is not all about money. Similar findings exist for waterway contamination, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings. This is a lot happening to many.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Read, Julia	I am an American citizen residing in Australia, but I have vivid memories of American wildlife from my childhood in California, especially birds. It is important to avoid destroying bird populations even further than has already occurred.
Response: Comment acknowledged.	
Read-Weiss, Margaret	The findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor show that the risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife will always be more significant than thought.
Response: Comment acknowledged.	
Regan, Nora	We need to work harder than ever to protect our precious coastal ecosystems. This means no oil terminals which could quickly and permanently decimate these areas and their resident species. We learned years ago from the Exxon-Valdez disaster that oil companies just don't care and can buy their way out of any mishap they leave in their wake.
Response: Refer to the Master Response for Liability and Responsibility for Incidents.	
Rego, Margaret G.	MY OPINION IS: EXTRACTING OIL AND/OR HATEVER IS INSIDE OF OUR PLANET IS WRONG!!! PETROLEUM (OIL), NATURAL GAS AND EVERYTHING ELSE INSIDE EARTH... BELONGS WHERE IT'S

	FOUND... THE CONTINUED ABUSES UPON ERTH WILL, AS WE CAN ALREADY SEE HAPPENING ... IT IS A MATTER OF KILLING OUR ENTIRE PLANET... !!!
Response: Comment acknowledged.	
Reid, Nancy	Solar energy has proven to be the quickest, least expensive, longest lasting, most easily implemented, cleanest way to address our energy needs. It does in fact employ more people in permanent jobs... so why not go that route. Tourism is also a factor and nature lovers and birders travel and spend money that creates even more jobs. It is clear that fossil fuels is not the way to go.
Response: Comment acknowledged.	
Reidy, Katherine	Please, I so much agree that you should reject the Westway and Imperium oil terminals! I also agree that better ways exist to meet our energy needs. The cost of accepting the oil terminal proposals is definitely not worth the benefit!
Response: Comment acknowledged.	
Reineke, Toni	I grew up in Hoquiam and have visited Grays Harbor estuaries many times throughout my life. I realize that the Grays Harbor area is suffering economically, but I believe that that suffering will only increase over time if any further damage is done to the natural areas. I BEG YOU TO NOT TAKE ANY CHANCE AT ALL OF SPILLING EVEN ONE DROP OF OIL INTO THIS FRAGILE RESOURCE. Thank you for listening!
Response: Comment acknowledged.	
Remer, Mary	Please do your best to find another area that is not a threat to an endangered specie. I'm sure bird watchers in western Washington also flock to the area and bring money with them.
Response: See Response to FL1-1.	
Renken, Colleen	We as the citizens of Washington state do not want drilling for oil off of our fragile, very fragile coast. If, There was a spill, it would not only ruin recreation areas of our state but, it would kill wildlife and shellfish. Do your drilling somewhere else!!! And leave our beautiful pristine coast for us to enjoy. We do not want to see oil rigs off of our coast!!
Response: Comment acknowledged.	
Reppa, Douglas	As a wildlife rehabilitation volunteer who cleans animals fortunate enough to survive inevitable man made oil disasters, I urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Reynolds, Johnathan	Is this another case of lust or money overriding respect for and observance the First Commandment? The violation of the First Commandment goes far beyond the strong possibility of poisoning birds. EVERY CIVILIZATION THAT HAS FALLEN, HAS FALLEN FOR IDENTICALLY THE SAME REASON, VIOLATION OF THE FIRST COMMANDMENT. READ YOUR HISTORY. ABRAHAM LINCOLN SAID, "WE CANNOT ESCAPE HISTORY." ARE WE PREPARING THE DESTRUCTION OF AMERICA WITH OUR LUST FOR POWER/MONEY? AS A VETERAN, I FEEL STRONGLY ABOUT THE ATTITUDE OF THSE WHO ADDICTED TO MONEY/POWER. MY FRIENDS WERE KILLED IN BATTLE FOR AMERICA. THE CALLOUS DISREGARD OF THEIR SACRIFICES CAUSED BY THE BLINDING OF THESE INDIVIDUALS BY ADDICTION TO MONEY/POWER. AMERICA, WAKE UP!
Response: Comment acknowledged.	
Rice, Michael	As a matter of fact, I was born in Aberdeen, right next door and in Grays Harbor, so I have a personal interest in protecting the beauty of this area.
Response: Comment acknowledged.	
Rice, Nancy	Native Americans in the area also depend on fishing, which would be gravely at risk with this development.
Response: Comment acknowledged.	
Richardson, June	It is time to save the Beauty of our nation & stop destroying it!
Response: Comment acknowledged.	
Rizzuti, Greta	I say NO to the oil trains going through our cities and NO to the oil terminals on the seashore.
Response: Comment acknowledged.	
Robbins, Steven	The energy industry has a particularly bad record when it comes to environmental safety. Why was there only one (defective) cap to cover the well head in Deepwater Horizon? Why was the Exxon Valdez a single-hull tanker when virtually every country in the world had gone to double-hulled

	tankers? Why was she manned with only 30 people who (in a disaster) could do little more than man the lifeboats and send a distress call? Oil spills are a fact of life due to the cheapness of energy companies. The Woods Hole Oceanographic Institute has proven that oil in the Gulf of Mexico still rides the thermoclines under the water and that there is an immense pool of hardened crude oil on the ocean floor. Why is BP (who trumpeted their effort to redeem the mess they made) not cleaning up these hazards as well? Why has Exxon been able to legally reduce the punitive fine for the Valdez accident from 10 billion to 2.5 billion (and still has not paid a penny)?
Response:. Refer to the Master Response for Liability and Responsibility for Incidents.	
Roberts, Cal	I come to the Grays Harbor area to recreate and want to keep doing it. Be responsible and keep the oil companies out.....OUT
Response: Comment acknowledged.	
Roberts, Chad	As a long-practicing coastal zone ecologist in northern California, I'd testify that Grays Harbor is a site of hemispheric importance to birds. The significance of petroleum spills in Grays Harbor extends well beyond birds. The cumulative release of toxic chemicals and oil is known to have negative effects on endangered salmon and other small fish. The importance of Washington's estuaries for shellfish is well known, and these resources are put at risk by oil terminal development. The environmental damage to marine habitats, wildlife, fisheries, and shellfish when inevitable accidents occur will be significant. Washington state should say no to more oil and coal, and no to the destructive effects of new port development proposed to service international trade in oil and coal. Because of the numerous, unavoidable, and enormous risks, I ask that you reject the Westway and Imperium oil terminal proposals.
Response: Comment acknowledged.	
Roberts, Sharon	Please do not put the Grays Harbor area in jeopardy. It hurts us all and the wildlife have no say in the matter.
Response: Comment acknowledged.	
Robertson, Diana	Please put the brakes on development of oil in critical coastal habitat. We cannot afford the risks.
Response: Comment acknowledged.	
Robinowitz, Marcialyn	We have one earth that all species must share. They have developed inter-relationships so that when we jeopardize one, there are consequences for all.
Response: Comment acknowledged.	
Robinson, Jane	Please do not allow Grays Harbor's safe sactuary for wildlife to be decimated by big oil and its cohorts.
Response: Comment acknowledged.	
Robinson, Daniel and Joy	PLEASE DO THE RIGHT THING!
Response: Comment acknowledged.	
Robinson, Donald	Because of their clear and enormous risks, I urge you to reject the Westway and Imperium oil terminal proposals: * Oil spill risks can't be fully mitigated, * Environmental damage to marine habitat and wildlife, especially migratory birds, could be significant, * Pronounced human public health concerns are raised by the likelihood of waterway contamination, train accidents, increased train and oil tanker traffic and air pollution, * Naive tribal culture and resources will be adversely effective and finally, * Public commuting inconvenience caused by vehicle delays at railroad crossings. Furthermore, exporting oil undermines our nation's domestic energy security. These fossil fuel reserves, which are non-renewable once used or sold abroad, need to stay in the USA as our nation develops cleaner, renewable and greener energy sources.
Response: Comment acknowledged.	
Robinson, Veronica	We certainly want to do all we can to protect or residential and migrating birds as well as our fish and marine life. They are helpless creaturs as far as this matter goes and we are their voice. The BP Oil spill is still so vivid in my mind and what a tragedy that was. Please lets find another way to transport this oil.
Response: Comment acknowledged.	
Rockwell, Abigail	The decisions we make are our legacy. Our personal legacy and the legacy of us all.

Response: Comment acknowledged.	
Rodarte, MaryKay	As a 69 year old mother of three and grandmother to 8, I have watched as fossil fuel companies have damaged our lands, our waters, our air and our natural beauty. Washington is a wonderful state for tourists.
Response: Comment acknowledged.	
Rodriguez, Rolando	I live on the Oregon coast and a spill anywhere will be felt her.
Response: Comment acknowledged.	
Rodriguez, Susan	We need to stop using the deadly pollutant. Our shores have suffered, our oceans have suffered and our lands have suffered. The wildlife and ocean lives are changed forever or are dead.
Response: Comment acknowledged.	
Roelke, Eloise	Must we destroy everything because of oil. When it's gone, it's gone. Please think about the future for your kids and mine.
Response: Comment acknowledged.	
Rogers, Mark	We can't afford to turn over our best coastal habitat to an industry that has shown it cannot prevent or contain oil spills. We've seen the devastating effects of oil spills in Alaska and the Gulf Coast--let's keep that from happening in Washington.
Response: Comment acknowledged.	
Rogerson, Vicki	Let the birds refuel- not us!!!! Say NO to oil by rail terminals!!!
Response: Comment acknowledged.	
Rohrer, Kathleen	THE INCIDEOUS SIDE EFFECTS OF CONSTRUCTION OF THIS TERMINAL REACH ACROSS OUR NATION. LANDSCAPES TURNED TO WASTELANDS. HUNDREDS OF SPECIES EXTERMINATED. LAND LEFT DERELICT, UNFIT FOR ANY USE. PRECIOUS WATER WASTED FOR MINING OR TURNED TO FILTH. ENVIRONMENTAL SUPER FUNDS SULLYING THE BEAUTY THAT IS AMERICA. AND THEN THERE ARE ALL OF THE HORRORS FOR HOQUIAM AND WASHINGTON SHOULD THEIR BE TRAIN DERAILMENTS, FIRES, SPILLS. ARE YOU MAKING AN ECONOMIC DECISION WITHOUT CALCULATING ALL OF THE POTENTIAL COSTS TO ALL AMERICANS.....TO ALL CITIZENS OF EARTH?
Response: Comment acknowledged.	
Rollo, Pat	YOU DON'T PUT OIL TERMINALS WHERE MIGRATORY BIRDS STAY, THEY ARE PROTECTED BY FEDERAL LAW. DO YOU OR DO YOU NOT HAVE THE BRAINS TO FIGURE THIS OUT? SERIOUSLY, WHY WOULD YOU EVEN CONSIDER THIS AND FOR EXPORTATION, REJECT THIS IMMEDIATELY.
Response: Comment acknowledged.	
Rose, Tom	Protect the environment while it still exists. Thanks for considering my opinion.
Response: Comment acknowledged.	
Rossin, Linda	Are we truly planning to destroy ourselves and every other living thing on this planet?
Response: Comment acknowledged.	
Rote, Ada	Our ravenous expansion of oil industries is already forcing so much wildlife out of this world it makes me sick at heart. What a greedy, ruinous generation this is - and all the time carrying on about American values - our children mean the world to us, etc. etc. - at this rate, all we're leaving them is a smoking, oily destroyed landscape with no beauty, no wonderful wild things. I see filthy oil spills everytime I look at my computer news. PLEASE FIND ANOTHER WAY.
Response: Comment acknowledged.	
Roth, Nancy	We do not have a right, as human beings who are also part of the web of life, to endanger other species, for it diminishes us, as well.
Response: Comment acknowledged.	
Rowe, Tari	Boooooo. Let's invest money into renewable energies that don't put other's lives at stake! What GOOD does putting up giant pull thanks and EXPORTING TO CHINA really do for anyone's FUTURE?
Response: Comment acknowledged.	
Rowell, Patricia	How many times must oil spills occur and endanger humans and wildlife before the government gets serious about protecting the environment and human beings. Stop accepting the money big oil and big industry pay to pollute our world.

Response: Comment acknowledged.	
Rowlett, Kimberly	We need more protections environmentally for these environmentally, biodiverse and natural resource rich areas of the SE Hamilton, co, SW Bradley areas which are still being forced into ex/sub/urbanization and/or rezoning into urbanized areas and more developed areas, wrongly! These areas around the general areas of Collegedale, Summit, (E) Brainerd, E. Hamilton, Harrison Bay State park and into Ooltewah, as well as the communities of McDonald, Lebanon, Apison, Oak Grove, Flint Springs, Black Fox, Blue Springs, Red Clay State historic park and into adjoining areas such as Cohutta, Cherokee Valley Ga,etc. need to be more protected via the EPA/DOI, National Forest/Park Service, USDA, to protect these areas and important landscapes from being used for the wrong land uses. These areas do not need their roads, trails, paths, etc expanded, or to have more lanes added, in any of these above areas, as there are habitat areas for endangered/migratory/threatened species in and around these areas and thier waterways, such as that along or in front of the Collegedale Cookie factory, which needs preservation as it is a place utilized by wildlife such as coyotes, wolves, migratory geese/ducks, dragon/damselfies, sandhill/whooping cranes and so on. There is more sprawl occurring in and around the areas, and getting more into the 'backoods" area around the McDonald, Blair and Shortcut road areas, in addition to the many other roads, trails, paths,etc which are being destroyed by TDOT, paossibly GDOT and other public works and construction type companies. These areas do not need more developments, or real estate developments of any kind, nor do they need expansions of those or other kinds of real estate developments, whether commericial, industrial, residential,etc. The bulldozers, etc are being spotted in vairous areas, for destruction of these areas where there are large flocks of migratory birds, geese, ducks, wild turkey, and other birds, insects and wildlife which need to be left intact with no clearing of the wooded lands, etc. in and around these areas and areas around Lester Coon School, and others. There are environmental protections for these areas, their lands, those that work in and/or around these areas in ecotourism, farming, and so on. These areas also have lots of water running through and under them them which are needed in the SE USA for replinishing rivers such as Coosa, Conasauga, and Tallapoosa rivers and so on providing them with water for their economic development, wildlife, drinking water, and so on. These areas, their waters need more protections from possibly dangerous contaminatiing under or above ground developments. We need the Obama administration to help preserve and conserve these lands, paths, trails and natural resources from more wrong land uses. These areas and the state, and other areas in the south need to have many more enviornmental, civilrights oriented, and healthcare democracts to help in those areas and also to instill true and innovative clean green energy in these areas, and to be produced in this area of SE TN, along with clean energy ways of producing, transmitting and distribution of clean green energy for the future while preserving these lands for the future generations. We need to get our focus off real estate, big business, privatizing gov agencies, franchises, real estate developments, construction and so on, which has and will not offer the kind of growth needed for these areas or others in our region. We do not need our elected and other officials getting "their freinds" into these areas to carry out the destruction of wildliife habitat and the beautiful landscapes on which much of our national history was played out on. Possibly in the future it might be good if we could have a permanent environmentally friendly Audubon and/or nature conservancy type botanical garden, instead of a large substation, or unsustainable developments, in or around these areas. We need to be deannxed from forced ex/sub/urbanization of the cities,etc around these areas. We need the citys to recede back into themselves, and much more of an emphasis on keeping these and other rural buffer zone lands, communities and areas natural, "rewildernessed", and/or 'rewilded". Please help in all areas possible.
Response: Comment acknowledged.	
Roy, Will	We have got to stop putting wildlife species in jeopardy for an energy source we have to stop using!!!
Response: Comment acknowledged.	
Royce, M	Have we not learned any lessons from what has happened in the past?
Response: Comment acknowledged.	
Ruby, Meg	Every year I drive up to Grays Harbor for the world class birding. These developments must not be allow as they will ruin this habitat for millions of local and migrating birds.
Response: See response to Comment FL1-1 above.	
Ryan, Denny	Common sense also dictates this is a no brainer!
Response: Comment acknowledged.	

Rykiel, Edward	As you must be well aware, the oil industry has already contaminated vast stretches of our coast line. These terminals would just be accidents waiting to happen. Due to these numerous and enormous risks, I ask that you reject the Westway and Imperium oil terminal proposals. Surely you know that Gray's Harbor is a very special place for Washingtonians, but you may not know that Grays Harbor is a site of hemispheric importance to birds.
Response: Comment acknowledged.	
Sagardua, Mariana	Oil terminals mean extiction for many bird spieces. As simple as that.
Response: Comment acknowledged.	
Sain, Robert	What's good for the environment is good for you and me. Thanks to Audubon I learn about threats to our environment. These proposals are death sent. The preservation of our environment is the way.
Response: Comment acknowledged.	
Sakura, Peter	The world's atmosphere has 400 ppm greenhouse gases, but needs to get back down to 350 ppm or below, 1985 levels. Everything we can do to get there we must do. We must do it for the sake of our children and grandchildren. I support the protection of Grays Harbor, its marine life, and its people, and urge you to summon the courage to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Salas, Sylvia	Please reject this new project and seek renewable clean energy solutions.
Response: Comment acknowledged.	
Sale, Alexandra	In point of fact, there are not now nor do I believe there ever will exist any method to "clean up" an oil spill. These findings are science based. The oil and the railroad industries have been allowed free reign over our lands and our waters for far too long. A compliant government has taken money from both industries for decades and it's time to say "NO" and put the best interests of America first. Please remember that both of these have only one interest and that is money, money, and more money and to hell with the people and the environmental impact for which there is no solution. I have read about the horrific train derailments due to old train tracks or failure within the cars that haul oil. I live in a city that has trains run through it a minimum of six times per twenty-four hour period. The train industry has been negligent in replacing these critical items. Even if they were to do so, I don't want oil trains anywhere near my town and I seriously doubt that any of your citizens do either. Why would you risk it if even one oil spill could have devastating effects on this species' survival? Take a look back at history and take note of all the birds that were killed, whose populations were decimated, and how many of these have not been able to rebound to a sustainable population. When you do so, your only answer can be a denial for the Westway and Imperial crude oil-by-rail proposal. It is simply not in the best interests of Washington and the rest of the United States of America.
Response: Comment acknowledged.	
Salisbury, Sandra	I am writing to you concerning Grays Harbor and the Westway and Imperium oil terminal proposals. Grays Harbor is a site for many birds both residing and migrating they rely on the Grays Harbor for their livelihood. I read that research by the Washington Department of Fish and Wildlife shows will affect the birds using Grays Harbor. If there is an oil spill it would devastate not only the water life but, our feathered friends. Don't you feel there are better choices to be made for energy needs? I am one of millions of people in America who believe we are killing our world with current energy sources. This is just another bad choice for clean air and water. Going through with this terminal proposal is just terrible and will lead to more natural life, land and water destruction.
Response: See Response to FL1-1.	
Sallee, Barbara	Every species is important in the web of life but the Red Knots are an amazing, long range migrator and at risk shorebird. We can't afford to let selfish oil policies risk accidents that would kill large numbers of them and other birds and animals. Prevention is so much better than trying to fix things later. It will be too late then!
Response: See Response to FL1-1.	
Sanford, Nathaniel De'Vo	Code Green

Response: Comment acknowledged.	
Sansone, V R	How much more of the our world and its inhabitants must we destroy just to make a few people richer ??
Response: Comment acknowledged.	
Saunders, Betty	Please protect our birds and wildlife since species have been shrinking in population in prior years. If we do not begin to put them first in our development planning, our grandchildren and great grandchildren won't have the beautiful wildlife and birds which we take for granted.
Response: Comment acknowledged.	
Sawyer, Melanie Morris	Please reject the Westway and Imperium oil terminal proposals. The risks are just too great.
Response: Comment acknowledged.	
Scherkenbach, Susan	Please protect the wildlife of your beautiful State from becoming victims of a disaster like that of the Gulf coast. Thank you!
Response: Comment acknowledged.	
Schneck, Connie	Why don't you use the money you're wasting and put it towards different alternatives? I am so sick of hearing of the birds and other animals getting put in danger. WE NEED AN ALTERNATIVE TO OIL.
Response: Comment acknowledged.	
Scholten, John	When I lived in Aberdeen, Hoquiam and area for some years I was aware of and appreciated the large areas where birds felt safe when doing bird things such as migrating, feeding, resting etc. Coal and other carbon we need to leave in the ground now, not take it out to endanger ourselves and our friends the birds.
Response: Comment acknowledged.	
Schultz, Joy	UNLESS YOU THINK THAT FOSSIL FUELS HAVE NOT YET DONE ENOUGH DAMAGE TO OUR PLANET, YOU WILL REJECT THE PROPOSED WESTWAY AND IMPERIUM OIL TERMINALS. SURELY THE CORRECT DECISION IS READILY APPARENT THANKS TO THE HORRENDOUS OIL SPILLS THAT HAVE ALREADY BEEN VISITED UPON OUR OCEANS AND RIVERS. THESE CALAMITIES ALONE MUST HAVE TAUGHT ALL SENSIBLE PEOPLE THAT IT CAN NO LONGER BE BUSINESS AS USUAL WHEN IT COMES TO FOSSIL FUELS AND THAT OUR PLANET AND ALL LIFE ON IT MUST BE PROTECTED FROM EVEN FURTHER HARM THAN THAT WHICH IS NOW UPON US AND THAT WHICH IS YET TO COME.
Response: Comment acknowledged.	
Schultz, Margaret	As an RN and a former Associate Professor of Nursing, I am certain that human life is dependent on an environment that sustains all of life in its many forms.
Response: Comment acknowledged.	
Scott, Celia	The time has come to say NO to projects like this, and to protect our precious natural resources rather than destroy them!
Response: Comment acknowledged.	
Scott, Gina	This is such a sad commentary on money and GREED at the expense of our precious flora and fauna on this delicate earth. Please consider other options in energy decisions. Thank you.
Response: Comment acknowledged.	
Seamster, Teresa	Please understand why we are writing to you. Birds are a source of enduring health and propagation for our mutually shared environment. We cannot share a productive environment without them, whereas the sooner we learn to exist without fossil fuels, the longer and healthier our lives will be.
Response: Comment acknowledged.	
SEATHER, LINDA	THIS IS SUCH AN IMPORTANT AREA FOR THE MIGRATING BIRDS WHO NEED A REST STOP SO VERY MUCH; PLEASE REJECT OTHER PLANS SO THE BIRDS AND OTHER WILDLIFE CAN HAVE A MUCH NEEDED RESPITE AREA.
Response: See Response to FL1-1.	
Sedlack, Elaine	Please consider the implications carefully and act on your conscience in a proactive way,
Response: Comment acknowledged.	

Sefton, Nancy	It may have already happened, but please do turn down any proposals for oil terminals at Hoquiam...Westway and Iperium.
Response: Comment acknowledged.	
Sekerak, Robin	It is evident that the world needs to divest its interests and dependence on fossil fuels. Yet, we keep supporting further development in the US, many areas our some of our most biodiverse. We are all dependent on biodiversity.
Response: Comment acknowledged.	
Senturia, Brenda	I was a resident of Washington State for more than 20 years and a regular bird-watcher for all of that time. I made many visits to Gray's Harbor to see migrating birds and this is a spot of International Birding recognition.
Response: Comment acknowledged.	
Sernaker, Aviva	I resided in the Seattle are during the 1980's (University of Washington BA in Business 1987) and sincerely appreciate the beauty of the Pacific Coast and its attraction to tourists. The old-growth forests on the Olympic Peninsula were clear cut and cannot be brought back; please do not sacrifice the coast and the birds to the oil industry.
Response: See Response to FL1-1.	
Sexton, Nicholas	NO more OIL! We have Leafs on the road today! Everybody, INCLUDING ShellNO and eXXXon, know that global warming is happening NOW. No oil terminal deal unless big oil companies acknowledge global warming publicly, invest in renewables, and give out electric car subsidies! They know this is real too, and their are NOT helping!!!!
Response: Comment acknowledged.	
Shair, Kyra	I am writing you to ask that you deny the proposed oil terminals for Grays Harbor, because huge numbers of birds land there during migration! The likelihood of spills is far too great, and the damage done to this important migratory stop would be devastating! Since spills in this area would be impossible to mitigate fully, and the damage done to this area for the marine habitat and to wildlife would be very significant!
Response: See Response to FL1-1.	
Shapiro, Michele	Be strong like Portland and Stop Oil and Natural gas expansion.
Response: Comment acknowledged.	
Shea, Marjorie	I've visited and enjoyed Grays Harbor many times. The thought of oil terminals in this lovely spot is very disturbing--and for shipment to China?
Response: Comment acknowledged.	
Sherrill, Ronda	For a few years of my life I lived in your beautiful area and would love to return for a visit, not to devastated areas, but the pristine beauty that is your heritage.
Response: Comment acknowledged.	
Shimel, Gene	We have visited Washington state numerous times, specifically to bird. The risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife could be significant.
Response: See Response to FL1-1.	
Siefken, Debra	Oil terminals along the coast at Grays Harbor will be harmful for migrating birds.
Response: Comment acknowledged.	
Siegwald, Joan	I am writing to express concern about the Westway and Imperium oil terminal proposals in Grays Harbor.
Response: Comment acknowledged.	
Siewert, Shirley	Do we have to have oil wells drilling on every piece of our planet? Is our wildlife so unimportant that we can just waste it away? How disgusting!
Response: Comment acknowledged.	
Sikes, Lewis	The danger to the people and enviroment of Grays Harbor is too big to allow a Oil terminal there.
Response: Comment acknowledged.	
Simon, Jane	Please consider the wildlife before proceeding with approval of this dangerous policy. Thank you.
Response: Comment acknowledged.	

Skutek, Stan	It is frustrating that the lessons have not yet been learned. The state of Washington is fortunate to have valuable coastal habitats and the migratory birds that use them in such great numbers. Because of the habitats and wildlife that would be at great risk should this project move forward, I ask that you reject the Westway and Imperium oil terminal proposals.
Response: Comment acknowledged.	
Slack, Francine	"Birders" are clean sources of income. Here in Florida we find a large portion of our tourism dollars are contributed by bird and natire oriented visitors. We saw our revenue suffer because of the Louisiana well explosion and accompanying oil spill. Don't even consider such dangerous possibilities.
Response: Comment acknowledged.	
Slade, Susan	We already know the risks and damage inherent in oil production. The fact that this oil is bound for China and will eventually contribute to more global smog and pollution is a good enough reason to deny this project. Just as important is protection of our own coastal habitat including bird migration areas and sea life estuaries. The only answer is very simple. We must continue to defend the earth and its inhabitants every time we have a choice. Please, please vote NO.
Response: Comment acknowledged.	
Sleeper, Stephen	We have to stop allowing corporations to ruin our planet in the name of their bottom line. ...Once it's beyond repair, we have nowhere else we can go.
Response: Comment acknowledged.	
Slobin, Jan and Larry	We've visited Grays Harbor during migration and we'll never forget the sight of clouds of birds in the sky. They must be protected!!!
Response: Comment acknowledged.	
Smith, Kathleen	I urge you to reject the proposed Westway and Imperium oil terminal proposals. Risks of an oil spill cannot be fully mitigated and the environmental damage to marine habitat and wildlife could be significant according to the findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor.
Response: Comment acknowledged.	
Smith, Mara	I want to alert you of the problems that happen when huge oil export stations are constructed in wild habitat: I come from a small "oil family". I was supported through university on oil, enjoyed life because of oil. Yet now, as an adult, I find that many of my favorite wild places are contaminated with petroleum-related forms of pollution. My family can't fish in theses places that my forbears enjoyed, we can't bird watch in them, we can't go crabbing and camping is pointless. Please, consider confining these proposed terminals to already developed areas. Just put effort into organizing the traffic better in those areas, much like the air traffic controllers for busier airports step up their coordination efforts. We don't need to destroy more of our natural treasures.
Response: Comment acknowledged.	
Smith, Melissa	Having grown up on Florida's Gulf coast, the idea of any oil spill on the beach was scary. The DeepHorizon spill hit a sore spot: the marine animals, including birds, were threatened by the mess. Please don't allow further oil development in Grays Harbor.
Response: Comment acknowledged.	
Smith, Shirley	For our shorebirds, thank you for your time, sincere consideration and 'positive' actions in this urgent matter. Please step up and save our wildlife!
Response: Comment acknowledged.	
Snyder, Ronaele	Fossil fuels need to be left in the ground, there are other sources of energy we can use.
Response: Comment acknowledged.	
Soares, James	THIS MAY BE ABIT EXTREME, BUT THE CORPORATE ADMINISTRATION WOULD AGREE THAT ANY OIL-RELATED DISASTER WOULD BE TREATED AS A CAPITAL OFFENSE, FORFEIT THEIR LIVES AND THE LIVES OF THEIR FAMILIES, AND AT AT LEAST ONE BUT NOT MORE THAN 7 MEMBERS OF EACH STOCKHOLDER'S FAMILY , SURE, I'LL GO ALONG WITH IT. IF THEY FEEL THAT THERE ARE NO WORRIES - GREAT. BUT THEY CANNOT TAKE THE RISK WITHOUT BEING FULLY RESPONSIBLE FOR THE CONSEQUENCE, JUST LIKE EVERYBODY ELSE EXCEPT THEM.
Response: Comment acknowledged.	

Soldati, Joseph	When I go to Grays Harbor, i do not go to, nor want to, see oil refineries and terminals. I go in part for the natural beauty of the area; therefore, I support the protection of Grays Harbor, its marine life, and its people, and strongly urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Solheim, Lisa	Is there any sensible reason you must endanger a new area with your crude oil?
Response: Comment acknowledged.	
Sommer, Bettie	Live up to your reputation as a state of educated people and don't cave in to the grab-fest mentality, please!
Response: Comment acknowledged.	
Sommerfeld, Barb	Why should you have the chance to wreck more of our natural habitats? I don't trust that you will do the right thing. All Big Oil cares about is profit. Reject plans for any more terminals.
Response: Comment acknowledged.	
Sorrells, Hope Mckelvey	Have you forgotten the effects of the Gulf and Alaska oil spills? Do you want this for your state? I have been a visitor to your beautiful area. I shudder to think what could happen with this plan in place. Please consider the future we will be leaving our children. Thank you!
Response: Comment acknowledged.	
Southwick, Christine	I am totally against this terminal. Even without a major spill, there will be contamination from transport and usage at the terminal. Wrong place/wrong time.
Response: Comment acknowledged.	
Spencer, Gayle	The risk is too high to allow the oil terminal.
Response: Comment acknowledged.	
Spencer, Karen	My family and I called Kingston, WA home for many years and have fond memories of beach combing there. Please protect Gray's Harbor for all future and migrating wildlife. Our wild lands and shores are under siege and you are fortunate to have a critical voice in protecting it. Thank You!
Response: Comment acknowledged.	
Spencer, Virginia	Many more losses! I believe that many species of birds and animals will disappear, probably in the next 10 - 20 years by both small and large changes in our earth's environment.
Response: Comment acknowledged.	
Spisak, D.J.	Does anyone care if we destroy every living thing we encounter so long as we get plenty of what we want? We keep trying to ignore the horrible consequences of our oil addiction, both deep water drills and transport facilities - and yet we think we are superior to those we kill. It makes one ashamed to be a human.
Response: Comment acknowledged.	
Sramek, Jo-Ann	Wildlife is struggling to survive; they don't need anymore interference from the big corporate oil companies with their stifling development which has an negative impact on their habitat and pushes climate change even more toward the danger point.
Response: Comment acknowledged.	
St. John, Lee	You'll get plenty of letters asking that you do not allow this truly awful plan to go through. They will have lots of facts. The pollution dangers, the death of birds, ocean creatures, beaches unusable by anyone or anything. Possible train crashes, the idea that once a spill happens life in that space never really returns to pre-spill life. But I'm going to keep my letter short. There is not one good reason to put the water ways, sealife, birds, plants, people in danger by allowing this plan to pass. Not one.
Response: Comment acknowledged.	
Stachenfeld, Marilyn	Pleaser say a resounding NO to the destruction of our, and thus the world's, natural balances--our ecology.
Response: Comment acknowledged.	
Stahle, Patrick	I think we have had enough of big oil and it's greed trumping the rights of future generations of Americans to enjoy the wildlife this country has to offer. I object to further taking or use of land that disrupts wildlife. This is my country too and I want to preserve what little wildlife is left. I will be telling everyone I know about this and we will all be watching closely and voting at the polls or with our wallets accordingly.

Response: Comment acknowledged.	
Stalnaker, Bob	Please stop your destruction of wildlife. It is going to be a barren planet soon due to your destruction of critical habitat. We want a world that includes these magnificent species. There are other places, already destroyed land, to build your damn oil terminals.
Response: Comment acknowledged.	
Stanley, Carla	As a coordinator of the Kachemak Bay Shorebird Festival, it is frightening to think that oil terminals are compatible with the migration of millions of Shorebirds. I have witnessed the Exxon Valdez oil Spill as an employee of Alaska Dept. of Fish and Game. I have digitized thousands of images of dead seabirds as an employee of USFWS. It is not a pretty sight, and most of these birds are dead or dying when recovered. Estuaries are one of the most valuable areas of our planet's oceans, as a nursery and for marine animals and a sponge to clean the waters coming from the continental sources. They also protect our shorelines from storms. As a member of the Cook Inlet Regional Citizens Advisory Council, I believe that if such a facility were to be built there, it would be of utmost importance to have an advisory council there to study, and help make decisions concerning the oil industries presence in the area. OPA 90 has a very loud voice in our Alaskan waters, and Washingtonians will need the same.
Response: Comment acknowledged.	
Stauske, Anette	Oil extraction, transport, and export across our country contributes to greenhouse gas emissions responsible for global warming. If the terminals are built, as much as 126,860 barrels of crude would arrive by train every day, another enormous source of risk. Oil trains have a bad safety record--in 2014 there were 141 oil train spills across the United States.
Response: Comment acknowledged.	
Steele, L	We must stop using deadly fossil fuels.
Response: Comment acknowledged.	
Stein, Sari	IMPLORE you to REJECT the proposed Westway and Imperium oil terminals. IT IS THE ONLY SANE ACTION TO TAKE -- OTHERWISE IT IS A DEATH SENTENCE FOR ALL.
Response: Comment acknowledged.	
Steinberg, Jane	We are the caretakers of this planet and all the life on it, and we have no right to continue to endanger for commerce what so far we have allowed to survive.
Response: Comment acknowledged.	
Steitz, Jim	As a former resident of the Pacific Northwest, who retains great affection for my original home, I urge you to reject the proposal of Westway Terminal Company and Imperium Terminal Services to ship crude oil through Grays Harbor. The volume of oil to be handled by such terminals would constitute an unmitigated ecological disaster, in violent opposition to the state's objective of reducing carbon dioxide emissions. The Washington State government has expressed an overall goal of moving toward a lower-carbon economy, and to avoid the worst impacts of global warming. If these goals are to have any meaningful policy expression within the agencies, tasked with carrying out a governor's policy, then the Department of Ecology cannot issue this permit. This oil export terminal would be linked by rail, and in turn link ravenous, inefficient economies overseas, to some of the largest carbon bombs in North America, namely the Canadian tar sands and the Bakken oil shales of the Dakotas. Human survival demands that this grave liability to our atmosphere remain securely underground. The Westway and Imperium terminals, and other proposals for fossil fuel infrastructure along the Pacific Northwest coast, would be especially and painfully ironic for a state that has otherwise made admirable and meritorious progress in shifting to clean energy and ecological sustainability more broadly. I can scarcely fathom the horrific reversal of ecological paradigm that The Westway and Imperium terminals would constitute for Washington State, whose role in the global energy infrastructure would invert from a leader in the low-carbon transition, to a conduit of death for the highest-carbon fuels on Earth. The State of Washington has already committed itself to regional greenhouse gas reduction initiatives, and even though the initiatives are not yet self-enforcing, the Westway and Imperium terminals' colossal volume of oil shale and tar sands would dwarf any carbon reductions attained in those frameworks. It therefore is a contrary and irreconcilable public policy to Washington's goals. Even before the climate impacts are considered, the immediate impacts to communities and landscapes between the oil sources and the departure point to the Pacific are numbing. The cities of Spokane and Grays Harbor would suffer an unacceptable diminution of their quality of life due to noise, air pollution, and the omnipresent eyesores of tankers and oil-loaded freight trains. Many other communities along the railroads

	further east would find additional hours of their day transformed into an acoustic and seismic barrage of rail traffic beyond anything they bargained for in joining that community. These oil-freighted trains have compiled a poor safety record in recent months. Their load of heavy crude is known to be even more explosive than lighter-grade oils, and human life is placed at unacceptable risk by running these loads on a recurring basis immediately adjacent to rail-line towns. Moreover, the risk of oil tanker spills in the precious waters of Grays Harbor and the Pacific Coast cannot be overstated. The coastline is a defining feature of both economic and aesthetic sustenance for Washington State, and no risk to its integrity should be contemplated. For all of these reasons, I urge you to immediately reject the Westway and Imperium terminals as contrary to the public interest of both Washington State and your fellow human beings around the world who depend upon a habitable climate. Thank you for your attention to this urgent issue.
Response: Comment acknowledged.	
Stelts, Marion	I would like to add my personal opinion. Global warming is real. Every barrel of oil that we burn contributes to the problem. It is too late to avert serious consequences but we can at least not contribute to it. We should also think about whether we should be leaving at least some natural resources for future generations. The main beneficiaries of the whole sale expenditure of our last oil are the executives and stock holders of the oil companies. Slowing our consumption of oil will require some change in life style, and personal pain shared among all of us. However, isn't it worth it to try to save something for our future generations and the other species sharing our planet
Response: Comment acknowledged.	
Stephan, Roberta	Say NO to oil terminals.
Response: Comment acknowledged.	
Stephens, Jenny	Slowly but surely, we are depleting our earth of so many irreplaceable species: birds, mammals, fish and plant life. Many of the plants I recall as a little girl in Pennsylvania are no longer to be found. Likewise, birds, butterflies and bees. As stewards of the planet, we have to do all that we can to prevent any more of these marvelous creatures, insects or plants from disappearing including having the common sense not to place any type of commercial endeavors in an area where an industrial accident would, in fact, cause devastation to living creatures and plants. Moving forward with this project is nothing less than irresponsible, greedy and cavalier.
Response: Comment acknowledged.	
Sterling, Deb	Please, what are you thinking? , and why do you think you should build these terminals in this very sensitive bird area? Plus Oil spills and accidents happen and that would be terrible for all the birds who need to stop over there in their migration routes. Also the endangered salmon and small fish there could be devastated by an oil spill. Please find better ways to meet our energy needs. We need safe, renewable clean energy solutions and not more oil and coal usage. We need modern ways to get energy and to discourage wasteful practices.
Response: Comment acknowledged.	
Stermer Sr, David	When are you's going to WAKE UP OILis destroying everything.
Response: Comment acknowledged.	
Stewart, Cleone	This is not right. Please consider the habitat and other uses this harbor provides!
Response: Comment acknowledged.	
STINSON, YVONNE	We must not put these lovely birds in the path of destruction.
Response: Comment acknowledged.	
Stirling, Allan	Enough is too much. Does a revolution to happen to get you people wakened up. No more of such money making stupid development. No a thousand times no more ruining of the environment for greedy profit.
Response: Comment acknowledged.	
Stocker, Janice M	Let's get away from these destructive oil monstrocities and stop killing off the wildlife, the birds, and people too.
Response: Comment acknowledged.	
Stocks, Jackie	"The time is always right to do what is right." ~ Martin Luther King Jr.

Response: Comment acknowledged.	
Stone, Chris	I'll take WILDLIFE AND THE SUPPORT FOR LIVING CREATURES OVER FOSSIL FUEL ANY DAY!
Response: Comment acknowledged.	
Stone, James	There would be too much impact to quality of life if these oil terminals were built. Please respect the concept that people and nature would be better off without the so-called progress of these big business projects which only profit the few. Our energy needs will be met with conservation. We don't have to create this oil infrastructure when we are on the threshold of using clean energy. The risky fossil fuel projects should be abandoned, the protection of water, habitat, and quality of life should be emphasized instead. Thank you for reading my comments.
Response: Comment acknowledged.	
Stoneham, Walter	I support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed West way and put our planet above profits1
Response: Comment acknowledged.	
Stotz, Nancy	As an avid birdwatcher, I am well aware of the biological significance of Grays Harbor, which provides critical refueling habitat for huge numbers of shorebirds during their migration. Not only does Grays Harbor attract shorebirds, it also attracts birdwatchers who come to see this amazing spectacle. The construction of the proposed oil terminal will negatively impact the region's eco-tourism potential. For a taste of the attractions of the Grays Harbor area to birdwatchers from around the country, and even the world, see the information about the 2015 Shorebird festival at http://www.shorebirdfestival.com/ as well as the Washington Ornithological Society's page about birdwatching on the Pacific Coast, which includes prominent links to business ranging from bird tours to lodging http://www.birdingwashington.info/RegionPacificcoast.htm.
Response: See Response to FL1-1.	
StPeter, Sue	Conserve and preserve. That should be our mantra. We are spoiled and wasteful, the trend has to stop. Please, give the planet some consideration.
Response: Comment acknowledged.	
Sullivan, Joan Paul & PJ	How much more will we lose in our wildlife & the health of this planet for the greed @ oil companies, who just do not care about life on this planet?!!
Response: Comment acknowledged.	
Sullivan-Greiner, Amy	I understand that you are most probably taken with the idea of having some new jobs, and possibly new property taxes in the area of Hoquiam. I can only ask you to consider, in pecuniary detail, the costs that oil terminals will bring. These won't be immediately obvious, or easily quantifiable: the water filtration services provided by wetlands, the species (including our own) who depend on fish & other marine life, are just two of many. The people of the Gulf Coast thought that BP, et al, were adequately maintaining their safety status. They continue to discover how very wrong they were.
Response: Comment acknowledged.	
Sundquist, Sandy	Damage from oil spills has happened in too many places and it is likely another could happen.
Response: Comment acknowledged.	
Surdam, Herschel	Wherever there is oil and water in close proximity, THERE ARE ALWAYS SPILLS. Stop them before it happens.
Response: Comment acknowledged.	
Suthers, Hannah	As a biologist working with bird populations, I emphasize No, no oil terminals in such an environmentally sensitive site! That area belongs to the wildlife.
Response: Comment acknowledged.	
swain, robert&mary	PICTURE WORTH A THOUSAND WORDS
Response: Comment acknowledged.	
Swan, Susan	I am counting on your leadership.
Response: Comment acknowledged.	
Swanson, William	There has been way, way too much destruction of Our World. It has been time, for a long time, too start saving what is left.

Response: Comment acknowledged.	
Sweet, Selina	BE GUARDIANS OF THIS HABITAT CRITICAL TO THE LIVES OF WILD LIFE. THIS PROPOSAL FOR OIL TERMINALS TO BE SITED IN SUCH A BIRD RICH ENVIRONMENT IS LUDICROUS!
Response: Comment acknowledged.	
Syroid, Dan	Shame! A really bad idea. Spills are inevitable. Do not let this happen.
Response: Comment acknowledged.	
Szemere, Anna	I was sad to learn that risks of oil spills cannot be eliminated and the environmental damage to marine habitat and wildlife could be detrimental. Similar problems are posed by waterway contamination, train accidents, increased train and oil tanker traffic, air pollution, noise, and so forth. There must be better ways to meet our energy needs.
Response: Comment acknowledged.	
Szymanskyj, Margie	I can hardly believe this ridiculous proposal is being considered. Haven't you learned anything from all the oil spills already on record? There have been thousands of spills. Sadly the public only hears about major spills, but there are many, many more that affect every living creature in their path. When are we finally going to start paying attention to our environment and what we are doing to it? This is the only place we have to live. It is imperative that we take care of it and and all its inhabitants.
Response: Comment acknowledged.	
T.M. Petkiewicz, Margaret	As a family with holdings in friday Harbor, we are absolutely against this.
Response: Comment acknowledged.	
Tache, Jan	Must we forever allow the oil companies to rape the earth? Can we not take a strong stand against their greed, their stranglehold on our energy systems, on our government?? Can we not finally stand up for our earth that is being destroyed by the blindness of humanity's greed? BY TURNING DOWN THIS PERMIT, PERHAPS HOQUIAM WILL BE PART OF ENCOURAGING THEM TO DIVERSIFY TO CLEAN ENERGIES AND TO FOCUS ON OUR OWN COUNTRY, OUR ENERGY NEEDS, OUR ENVIRONMENTAL NEEDS.
Response: Comment acknowledged.	
Tait, Doug	The risk is too great.
Response: Comment acknowledged.	
Tank, Robert	It is bad enough to have oil ruin our atmosphere. Leave our coastal waters alone! Isn't one BP and one Exxon Valdez enough?
Response: Comment acknowledged.	
Tansill, Roy	I live on the Texas Gulf coast and even Texas has better sense than to permit oil facilities on their coast.
Response: Comment acknowledged.	
Taylor, Donal Douf	PS: We have to stop KILLING CREATURES WHO NEED TO SURVIVE, AS WE DO!
Response: Comment acknowledged.	
Taylor, Gigi	The Gulf Oil spill is still in my mind - the area was devastated, much of it contaminated for an indefinite time. The images in my mind will remain forever.
Response: Comment acknowledged.	
Taylor, Ricky	My wife and spend many weekends each year bird watching in Grays Harbor.
Response: See response to Comment FL1-1 above.	
Tegtmeier, Mary	I live in Houston, Texas and can tell you we have oil spills that harm wildlife from refineries and transportation of oil.
Response: Comment acknowledged.	
TenWolde, Barbara	It is way past time that we put our efforts into new forms of energy; oil and coal are surely a thing of the past except for certain pockets.
Response: Comment acknowledged.	

Terry, Michael	Coal and oil need to stay in the ground to save our planet from global warming.
Response: Comment acknowledged.	
Thayer, J Sophie	Please think about our precious wildlife and habitat, and do no harm to our legacy.
Response: Comment acknowledged.	
Thompson, Eric	Is it really a good idea to ship a product that contributes to the the energy independence and national security of the United States to one of the two countries in the world that could be a real threat to this country? One of the reasons China has not become a greater threat to the nations of S.E. Asia is that they don't have significant in country suppies of what is necessary to fuel their war machines (in particular airplanes). I don't think I would want to be associated with anything that could be said to have led this country to a major war. I know I would not like to be said to have done so based upon monetary reasoning. If this oil is to be shipped in country; do so by pipe and not by a method that depends on environmental factors and human reasoning to be near perfect in order to keep your state and constituents in good health. Oil on land is virtually self containing. Oil on or in water is not. Please keep the wellbeing of the nation and your state in mind when making this decision.
Response: Comment acknowledged.	
Thornell, Nigel	Support solar and wind power, protect our home the earth!
Response: Comment acknowledged.	
Tilley, Judy	A note from me. Why do you think we should be exporting oil to China? Do we have such a glut that we had to send it 1000s of miles away? No, it is to line the pockets of investors. I realize the Hoquium area has economic issues but this is not the answer.
Response: Comment acknowledged.	
Tinkle, Sue	Oil spills are never an "if" proposition but a "when". For a bird to travel thousands of miles only to meet its demise due to a man made catastrophe is nothing short of a wildlife tragedy. Let's avoid it in the first place. Oil spills harm so many living things. It's our responsibility as stewards of the earth to not let this happen. All things are connected. This is not a cliche, but a truth. To harm living things is to eventually harm ourselves.
Response: Comment acknowledged.	
Titterington, Dave	Help stop human actions that continue to lead to rapid declining bird populations.
Response: Comment acknowledged.	
Tomlinson, Barbara	LEAVE ALL FOSSIL FUELS IN THE GROUND. 82% of Fossil Fuel Reserves must be LEFT IN THE GROUND - 82%! - if we are to avert Climate CATASTROPHE due to Global Warming. NO MORE drilling, coal mining, fracking, and transporting, leaking and spilling and exploding, and BURNING and spewing into the Atmosphere. NO MORE exploration for new sources! This should be Environmentalists' MANTRA: LEAVE FOSSIL FUELS IN THE GROUND. ========== Leave the OIL IN THE SOIL the Coal in the Hole the Tar Sands in the Land. Eliminate ALL use and extraction of Dirty Fossil Fuels for Energy, NOW! ASAP
Response: Comment acknowledged.	
Toner, Sheila	We need to stop destroying our environment to support China and other countries meet their needs at our expense. Once the oil spill occurs (and it will) we can not restore what we have destroyed.
Response: Comment acknowledged.	
torrecillas, patricia	We must consider the animals welfare, for as they go, we surely will follow, please consider the following:
Response: Comment acknowledged.	
Toshalis, Barbara	We cannot allow the decimation of major flyways and water resources and environments.
Response: See Response to FL1-1.	
Toth, Susan	Respect of marine habitat, wildlife, birds is part of the glory of our nation. We were given a beautiful land to live in, but there is no justification for destruction of all that beauty.
Response: Comment acknowledged.	

Towner, Erline	Please consider that every developmental action taken effects multiple layers of eco habitat that threatens some wildlife in ways that we can no longer ignore. The naive and myopic views and decisions of the past are now in our faces in the present. This decision can not be made from the same ideology.
Response: Comment acknowledged.	
Trotter, S.	IF GOVERNMENT AND CORPORATIONS CONTINUE TO WIPE OUT NATURE AND THE ENVIRONMENT FOR THE SAKE OF FOSSIL FUELS....THEN GOD WAS VERY CORRECT IN LAMENTING THE CREATION OF MANKIND.
Response: Comment acknowledged.	
Tuck, J. T.	Stop waterway contamination!
Response: Comment acknowledged.	
Turgeon, Amanda	My comments: I was born in Washington state near Puget Sound and have a vested interest in what happens in the state. Do not put my beloved coastal areas at risk. Haven't oil companies invaded coastal bird habitats enough? How many more species do you want to jeopardize before you finally get it? Do you remember Exxon Valdez? Or BP's explosion and subsequent major oil spills along the Gulf Coast? Oil-by-rail is even riskier than by ship. Railway accidents are much more frequent. Having a terminal at Grays Harbor will have even a greater risk. I am sure that with all the brainpower you have with your company, that you can find safe alternatives and cease with the Grays Harbor project. One spill and whatever $$$ you make and what you paid the city will all go to the clean-up. And the media and residents will be your enemies. Do the right thing. Find a safe alternative. ~ Concerned American
Response: Comment acknowledged.	
Turkewitz, Aaron	I am a US citizen, a resident of Illinois, who is gravely concerned about environmental issues and in particular the impact of environmental degradation on both biodiversity and human welfare. The recent findings in the DEISs for Westway and Imperium oil terminal proposals ..... Due to these numerous and enormous risks, I believe the only rational course is to reject the Westway and Imperium oil terminal proposals, and I request that you do so.
Response: Comment acknowledged.	
Turner, Michelle	We need to move away from this energy source instead of adding more terminals and more risk to our environment. Please do not allow these terminals to happen.
Response: Comment acknowledged.	
Turock, Sharon	The findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor show that the risks of oil spills aren't just possibilites but probabilities and can't be fully mitigated. The environmental damage to marine habitat and wildlife could be significant.
Response: See Response to FL1-1.	
Van Beveren, Chris and Jim	I have personally been to Gray's Harbor, as a passenger from a cruise ship some years back. We saw the lumberjacks and felt for their struggle with unemployment due to various regulations. But bringing in oil terminals is not the answer. Look at the many oil spills and explosions due to the oil trains. Current findings show that the oil trains are just too heavy to safely use railroad tracks and the derailments are inevitable. Towns are leveled, people die, and the ground and water are polluted with oil. The risk is not small, as the oil firms want you to believe. The damage is inevitable over time. Is that what you accept for this bargain with the devil? Why not try tourism instead?
Response: Comment acknowledged.	
Van Dellen, Marian	I am a lover of birds and feel strongly they MUST BE protected. I am concerned that installing an oil terminal in the Grays Harbor area of Washington State would be harmful for birds.
Response: See Response to FL1-1.	
Van Steeter, Mark	IMPORTANT: Also, please consider supporting a carbon tax at the state level. It is the most useful way to use the capitalist system to move actions from destructive to constructive.
Response: Comment acknowledged.	
Vanderschaegen, Julie	Take a moment to stand up out of your chair and grab a mirror. Gaze into your own eyes and repeat this: We no longer need to rely on oil. We no longer need to rely on oil. We no longer need to rely on oil. There are cleaner, safer, and in the long run, cheaper, sources of energy. We are facing an unprecedented environmental catastrophe if we don't put our foot down and start utilizing renewable energy. I agree largely with Elon Musk: "If we don't find a solution to burning oil for

	transport, when we then run out of oil, the economy will collapse and society will come to an end," Musk said this week during a conversation with astrophysicist and Cosmos host Neil deGrasse Tyson. "If we know we have to get off oil no matter what, we know that is an inescapable outcome, why run this crazy experiment of changing the chemical composition of the atmosphere and oceans by adding enormous amounts of CO2 that have been buried since the Precambrian Era?" he added. "That's crazy. That's the dumbest experiment in history, by far." Tyson sounded surprised: "Can you think of a dumber experiment?" he asked Musk. "I honestly cannot. What good could possibly come of [staying on oil]," Musk said. (excerpt from here: http://motherboard.vice.com/read/elon-musk-burning-fossil-fuels-is-the-dumbest-experiment-in-history-by-far)
Response: Comment acknowledged.	
Varellas, Dorothy	I have been to your town and I loved it and hope to visit again. We need to get off oil and all fossil fuels. The world as we know it cannot continue if we continue to use fossil fuels.
Response: Comment acknowledged.	
Vatter, Sherry	In light of these considerable risks, I ask that you reject the Westway and Imperium oil terminal proposals.
Response: Comment acknowledged.	
Vencill, Matthew	What is just is just. What must be done must be done. What is just must be done. What is just and undone shall take its toll from those responsible, through action, or through inaction. So it is. So it was. So it always will be. May it be that you are wise enough to do what is just.
Response: Comment acknowledged.	
Venne, Kim	Please support alternative energy sources and stop risking our environment on more petroleum investments. Protect our planet for all of our children.
Response: Comment acknowledged.	
Veteran, Janice	Please don't built an oil terminal in Grays Harbor. It is a beautiful natural setting that should not have human ship traffic and the risk of oil leaks, to humans or birds.
Response: Comment acknowledged.	
Victor, Daniel	There are some things more important than permitting drilling in new areas which not only does more harm to the environment and wildlife, but discourages investment in other energy solutions.
Response: Comment acknowledged.	
Vise, Pam	I was born in Seattle and graduated from Mercer Island. I have always been proud of the state's stand on animals and ecology. Please don't let greed override your conscience. i currently live on the Texas Gulf Coast and have seen first hand what oil and refineries can do to the environment. You don't want it in your beautiful state.
Response: Comment acknowledged.	
Vogel, Ralph & Beryl	Enough, enough!! Please, please help stop the oil industry from further spoiling our planet. Evan this one area. A hundred years from now when we are all gone, will there be any unspoiled habitat for the thousands of birds that absolutely must have healthy resting places in their migrations? Will they be there for future generations? Please reject the Westway and Imperium oil terminal proposals. Thank you.
Response: Comment acknowledged.	
Vogt, Eleanor	How disappointing that once again man is bent on destroying our wildlife so that they can make money. Wouldn't it be better for all to get educated on how to help preserve our resources by cutting back on the unnecessary use oil, water, electricity etc. We have become a ME country. So sad.
Response: Comment acknowledged.	
Volkmann, Shanti	I am not an ecology expert. I am a lifelong resident of Washington and frequent traveler to the Grays Harbor area for camping and beach/tide exploration with my family. I rely upon organizations such as Audubon to keep me informed of the threat to our natural world of oil exploration. I wholeheartedly support the following statements to be true. I support the protection of Grays Harbor, its marine life, and its people, and DEMAND you REJECT the proposed Westway and Imperium oil terminals.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Voorhies, Bill and Marilyn	There are far better ways to meet our energy needs. Washington state should/must continue to lead the nation on safe, renewable clean energy solutions and say no to more oil and coal.

Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Wade, Emily	I know you are as concerned as we all are on being sure that the shorebirds can continue to feed and gain weight so that they can continue their flight to South America. Thank you
Response: Comment acknowledged.	
Wagner, Matthew "Elvis"	Market conditions for oil exploration and pumping continue to deteriorate. Considering how risky these types of speculation are, why are we continue to build infrastructure for oil? Do we really need more oil terminals?
Response: Comment acknowledged.	
Walker, Beverly	We must all do all we can to stop the industrial greed and pollution and the destruction of our environment. This includes your company. We don't need the oil. We don't want it. We want all companies such as this one to stop killing us.
Response: Comment acknowledged.	
Walz, Kenneth	Also, the shoreline and the water would be contaminated if there was an oil spill. This would affect both humans and the wildlife and the plants.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Ward, Joshua	Again I implore you to see the reason behind this decision to keep this oil away from the area. This nation cannot afford another disastrous oil spill. We all remember Deep Water Horizon. Imagine that happening again, except the oil would be on Washington's shores and your population would have to suffer the consequences. I understand that companies put in measures to prevent such accidents, but the risk and its stakes are just too high. If the plan goes forward, something awful will happen at one point or another, and its effects will not be pretty. I plan on visiting Washington State and the Pacific Northwest in the next few years. I don't want to see a massive oil operation tarnishing the stunning coast lines for which the region is known. Make the safe call, the protective call.
Response: Comment acknowledged.	
Ware, Debra	We have to defend ourselves from Big oil. They REALLY do not care if they kill us all!
Response: Comment acknowledged.	
Warren, Kay	We don't need oil development. It is about to run out. WE DO NEED ALTERNATIVE ENERGY. There are many choices available. Please let us protect ALL life.
Response: Comment acknowledged.	
Wasner, Colleen	ONE WONDERS WHY WE EVEN PAY TAXES TO EMPLOY DOE AND NATURAL RESOURCES AND OTHER PANDERERS TO OIL AND LOGGING. SICK.
Response: Comment acknowledged.	
Watson, Maryann	Please keep this harbor as safe as possible--we've seen too many water/oil messes !
Response: Comment acknowledged.	
Weaver, Barry	Vulnerable Grays Harbor is a site of hemispheric importance to birds.
Response: See Response to FL1-1.	
Weaver, Andrew	Your actions of today shall be judged by those of tomorrow...
Response: Comment acknowledged.	
Webb, Sandra (Sandy)	We should be trying to leave oil, gas and other petroleum products in the ground. Fossil fuels are for fossils. We simply MUST move ahead! Although many other products are made from petroleum, we must get past burning ANYTHING! One oil spill could have devastating effects on this species' survival - and this just ONE species! Furthermore, the cumulative release of toxic chemicals and oil leaks is known to have negative effects on endangered salmon and other small fish upon which birds rely. The fishermen who depend on salmon also have a huge stake in this endeavor.
Response: Comment acknowledged.	
Wehr, Paula	The 1988 Nestucca oil spill still has many lessons for us to learn. Twenty-five years later, there are no answers to many of the problems resulting from what is, compared to the Exxon Valdez or Deepwater Horizon, a minor oil spill. Of the 52-78,000 birds impacted by the Nestucca oil spill, only 13,000 were captured and only about 1,000 survived. Grays Harbor County still has no specific plan

	for how to handle the resulting oily debris generated from a potential new oil spill. Oiled waste is routinely classified as nondangerous, nonhazardous solid waste, so all that's needed is a contractor who is willing to accept it. That sounds like a cavalier approach to dealing with oil, which has the potential to affect the central nervous system and/or be a causative factor for cancer. Please check the research by the Washington Department of Fish and Wildlife which documents the extensive use of the North Bay of Grays Harbor as the one refueling stop on the migration of the endangered Red Knots. An oil spill in the Red Knots' feeding ground could devastate a large portion of this already dwindling population. And birds won't be the only casualty. Toxic chemicals in the oil will find their way into the fish that live in the water. Fish are eaten by birds, bears and humans. Please protect this valuable habitat from the possibilities of oil spills.
Response: See Response to FL1-1.	
Weichler, Pauline	We are at a time when we have a surplus of oil and our environment is showing signs of stress.
Response: Comment acknowledged.	
Weinstein, Elyette	At the October 8, 2015 hearing, a seismologist/geologist presented factual evidence that the land on which these proposed terminals are to be placed will turn to jello in the event of an earthquake. As you know (I hope) we are in an earthquake zone. The terminals might be toppled by a Tsunami. Fisherman from Eastern WA, Portland and the Dalles, Oregon pointed out catastrophic risk to fish in the Columbia in the event of derailment. If you have read the news, you know that such things happen with alarming frequency. Parents of children who go to school yards from the proposed oil train tracks are at risk of being roasted alive. I saw you gaze impassively at those who presented these horrors to you because you are required to maintain neutrality. Nonetheless, it is the job of your agency to protect the ecosystem and the people of Washington. In addition, fishermen along the Columbia have presented ample evidence of devastating small business impact which should be at least as important as the financial gain of global oil conglomerates. Nothing less will meet the mission of the Department of Ecology.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Weiss, Dolores	Coastal estuaries are critical to hundreds of birds and other animals. The storage and shipment of toxic crude in the Washington State Grays Harbor will endanger thousands of birds, fish and other animals. We need to stop the oil industry from expanding its use of this area and to stop the likely devastation of this important and fragile ecosystem. The oil industry cannot stop accidents from happening so it needs to be kept out of fragile areas such as coastal estuaries.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Weller, Penny	Once there has been an oil spill, even small amounts, It would take years to restore the marine envirnoment to its previous condition and most often the oil companies never finish that job.
Response: Comment acknowledged.	
Wendt, Ingrid	Our supply of oil will run out anyway, in the foreseeable future -- but alternative energy sources will be available by then. Our endangered shorebirds have no backup plan; once they are gone, they are gone and cannot be replaced.
Response: Comment acknowledged.	
Wenger, Beverly	You are undoubtedly aware that birds never poop in their own nest, even as babies. Yet that is exactly what we humans are doing when we destroy our planet and the habitat of the animal kingdom in order to give greater profits to the oil industry. Just because we have a larger brain is no proof that we are smarter when greed, hunger for tax revenues and politics drive stupid, selfish decisions.
Response: Comment acknowledged.	
West, Judy	We've lost enough birds and animals because of the lack of common sense and the greed of large corporations. We don't need to lose another. Please reconsider building this storage facility, and allow these birds to continue to use this land as they always have, to rest and raise their young.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
West, Mark	I oppose the oil terminal on 2 grounds: 1) The potential environmental impact of a spill 2) That oil should be reserved for DOMESTIC use only and not sold to nations hostile to the USA
Response: Comment acknowledged.	
Wheeland, Allen	We must pay attention to what Grays Harbor is to realize why we cannot allow it to be compromised.

Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Wherrit, Thamar	Too many species have suffered and gone extinct due to human stupidity. It's past time to show that we do have intelligence and are willing to use it.
Response: Comment acknowledged.	
Wigeland, Patricia	Remember that a mistake could take it all away. And when it's gone....it's gone forever. Oil companies have spills every day and don't give a damn. Are you willing to give all your beauty up to something that doesn't give a damn?
Response: Comment acknowledged.	
Wild, Marth	Not only is development of this oil terminal a threat to an endangered species, but it is incredibly short-sighted. Our climate has already been irreparably changed by our use of fossil fuel, and to continue to extract and develop more fossil fuels is large scale suicide. Our only hope for humanity and the planet is safe, renewable, clean energy solutions. Stop the madness now.
Response: Comment acknowledged.	
Wildfong, William	Building more infrastructure for yesterday's energy would be moving in the wrong direction--especially when the proposed terminals would be for EXPORTING the oil to China!
Response: Comment acknowledged.	
Wildman, Whitney	PLEASE, THINK OF THE FUTURE FIRST - DO THE RIGHT THING FOR THE PLANET.
Response: Comment acknowledged.	
Williams, Joseph and Diane	YOU have the power to protect these precious and priceless lands. If not, and there is damage (and the odds are great), YOU will be the one blamed for this horrendous loss. Please "stand up" and "do the right thing." Thanks.
Response: Comment acknowledged.	
Williams, Wendy	It's time to wean ourselves from fossil fuels and stop the degradation of our planet. It's time to stop supporting old energy strategies and step up to the challenge of using clean, sustainable energy. Let's move the government subsidies from oil to solar. No more being held hostage by the oil industry. No more infrastructure for a destructive technology of the past.
Response: Comment acknowledged.	
Williams, Yvonne	I think it's fair to say the everyone agrees that enough is enough. Our planet and our wild life simply cannot take any more human abuse.
Response: Comment acknowledged.	
Willis, Margaret	I am worried about these developments. I have been to the Bird Rescue Facility in the St. Petersburg/Indian Sores vicinity in Florida and have seen the damage done to hundreds of birds affected by the horrific oil spill in the Gulf of Mexico. Most of these birds will never recover enough to be released to the wild. More of these accidents are causing serious consequences for bird and all other natural life. It is time that humans work together to save the planet from the devastation that is contributing to Climate Change, world-wide ecological and geographic disasters and the eventual dissolution of Planet Earth. All of us, everywhere, have to start putting an end to the conditions that lead to such earthly damage before it is too late. Please eliminate further contamination.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Wilson, Devon	Please put preservation of this unique habitat for all our children ahead of short term petroleum profits for a select few special interests.
Response: Comment acknowledged.	
Wilson, Kent	Before much more of the Earth is polluted and ruined--
Response: Comment acknowledged.	
Wilson, Jacqueline	Leave Grays Harbor for the migrating birds, esp. the Red Knot.
Response: See Response to FL1-1.	
Wilson, Judith	Just what we need is another oil spill or toxic waste going into the environment. I urge you to stop this assault on the migratory birds who depend on this refueling stop to survive.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	

Wilson, Pat	I have lived theough the devastating Gulf oilspill from the Deepwater Horizon spill. No amount of profits from oil and gas can compensate for the loss of wildlife and rich habitat that was damaged. It is not a question of IF but WHEN other spills happen, wherever oil production occurs. Do not allow exploration or exploitation start in the beautiful and fragile Pacific northwest coast.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Windle, Holly	I urge you to reject the Westway and Imperium oil terminal proposals. We have seen too many oil spill disasters to be complacent about having oil operations in sensitive areas. Westway and Imperium oil terminals in Grays Harbor should be denied because the risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife could be significant. Washington State has a good reputation about energy policy, but this would be step backward. We should be shifting away from a reliance on oil.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Winskie, Anne	As a bird watcher who has enjoyed the amazing spectacle of migrating shorebirds in Grays Harbor, I am writing to urge you to protect this critical stopover for such species as the Red Knot.
Response: See Response to FL1-1.	
Winslow, Lee	We have already seen in the Gulf of Mexico what a large oil spill can do. Do you really want that in your state?
Response: Comment acknowledged.	
Wittig, Patricia	PLEASE reject the Westway and Imperium oil terminal proposals!!!
Response: Comment acknowledged.	
Woehl, Jane	The lovely Grays Harbor! I remember it well. Our coastline and surrounding environments contribute to the great and unique landscape of the western states.
Response: Comment acknowledged.	
Wood, Levi	Critical coastal estuaries could face devastating consequences for birds if the oil industry is allowed to expand its operations in Grays Harbor. Hundreds of thousands of migrating birds visit this area each year. These migrating birds rely on this Pacific coast estuary to rest and refuel during migration. One oil spill could devastate this fragile marine ecosystem.
Response: See Response to FL1-1.	
Wood, Mary	I live in New Jersey where I have been able to enjoy the beauty and amazing migration of Red Knots on this coast. I am proud to live in the state that has protected their future by protecting their primary food source on their migration - horseshoe crab eggs. I lived in Washington for two years prior to living in New Jersey. I would expect the same concern for wildlife on the part of Washington residents. I am therefore surprised that you are even considering placing oil terminals in such a sensitive habitat. I beg you to reconsider.
Response: Comment acknowledged.	
Wood, Sandy	We continue to protest against the onslaught of oil trains, blast trains, hoping that the public protest will stop the danger before we have to deal with the results of an oil spill, explosion, etc. We have been warned, so many times, by oil and other fossil fuel derailments, explosions and fires. Why aren't we heeding the warning? Why aren't we concentrating on the clean energy potentials, creating new techniques, and sharing our intelligence and creativity with the world, rather than allowing BIG OIL companies, etc, control our lives? We can change the world, and have it safe for our children, grandchildren, and their grandchildren. We can protect our fish and birds and clean waterways and clean air, and continue to grow and prosper.
Response: Comment acknowledged.	
Wright, Laurie	I strongly support preservation of wildlife in the face of energy development and believe oil and gas companies need to be habitat and environment responsible....long overdue.
Response: Comment acknowledged.	
Wright, Sue	As a serious birder, and one who has visited Washington state in the past for birding and hope do to so again in the future, I am concerned with this issue.
Response: Comment acknowledged.	
Wyman, Carolyn	It's time for us to stop endangering our environment by accommodating the transportation of fossil fuels that further harm our environment when it is used to generate energy by the end user. Our policies need to help phase out the use of these fuels world wide.

Response: Comment acknowledged.	
Yates, Paula	Our environment and its animals are far more important than oil, oil terminals and oil company profits.
Response: Comment acknowledged.	
Young, Margaret	I love all wildlife and have been making it my business to speak out for them when their habitat becomes threatened. That is why I am writing this letter to you...because the birds cannot speak for themselves so I must do it for them. Please do the right thing for the birds, for the welfare of their habitat, and do not be influenced by the greediness of big oil and their willingness to sacrifice the environment for profit! Thank you for reading this!
Response: Comment acknowledged.	
Youngs, Howard	Any and all tar sand accidents will be considered premeditated mass murder and terrorism (each and every living creature: human, mammal, fish, bird, plant, worm, insect or single bacterium will equate to one murder each), Because of its established toxicity, the tar sands are considered a weapon of mass destruction, even without the occurance of an accident. Storage of tar sands within tanks, ships, pipelines or refineries should automatically be considered as potential mass murder, and therefore, not insurable.
Response: Comment acknowledged.	
Ziminski, Peter	Having spent the last 30 years visiting Grays Harbor during the spring to watch the shore bird migration, I can tell you that not only are the number of birds lower than they used to be, they are also stressed more by various other factors including: being chased by dogs, traffic on the beaches, and earlier migration times. You can see my photos here: https://pkzphotos.smugmug.com/Plants-and-Wildlife/Shorebird
Response: Comment acknowledged.	
Zimmermann, Adele E	HOW WILL YOU MAKE IT UP TO THE PEOPLE OF YOUR STATE WHEN ITS WILDLANDS ARE DESTROYED? HOW WILL YOU MAKE IT UP TO THE DEAD WILDLIFE?
Response: Comment acknowledged.	

Table 7-3. Names Associated with Audubon Form Letter

!!!, !!!	-, -	., .	., Benjamin	..., cat	....., Kiran
.misenheimer, kelle	`martinez, claudia	9, maribel lazaro	A be, Akiko	A, A	A, Brittany
A, M	A, Nora	A, Patti	A, Sandy	A., Eric	A., Kim
A., Lauren	a., nando	A., S.	Aanerud, Shelley	Aanning, Lars	aarness, Jennifer
Aaron, Kris	Aaronson-Krell, Paula	Abad, Mario	Abal, Ramiro	Abate, Joann	Abate, Michael
Abaunza, George	Abbasparker, Ibn-Umar	abbondante, jim	Abbot, Marrisha	Abbott, Alison	Abbott, Ashlyn
Abbott, Bruce	Abbott, Carol	Abbott, Galen	Abbott, JC	Abbott, Lawrence	Abbott, Linda
ABBOTT, MARINA	Abbott, Mary	Abbott, Melinda	Abbott, Patrice	abboud, judith	Abbruzzese, Michael
Abby, Kathy	Abdallah, Sue	Abdel-Gawad, Aliaa	Abdubek, Polat	Abdullah, Dirulislam	a'Becket, Suzanne
abel, chastity	Abel, Judith	Aber, Thomas	Abercrombie, Cristin	Abercrombie, Harmony	Aberg, Maryann
Abernathy, Greg	Abernathy, Jane	Abers, Melissa	Abirached, Pamela	Able, Nicky	ables, lori
Abner, Gordon	Abner, Tina	Abouata, Sarah	Abousamra, Renee	abraham, regina	Abrahams, Darcy
Abrahamson, Lauren	Abramić, Goran	Abrams, Gordon	Abrams, Jaime	Abrams, Paul	Abrams, Sally
Abramson, Julie	Abrell, Sarah	Abrevaya, Linda	Abuzerr, Khitam	Accappaticcio, Franca	Accetta, Lynne
Accos, Deborah	Acebo, Ryan	Acedo, Judy	Acevedo, Leticia	Acevedo, NK	acevedo, yara
Ach, Michael	Acheff, Gwen	Achey, Barbara	Achon, Michele	Achramowicz, Wenceslaus	Acker, Mike
Acker, Patricia	ackerman, judith	Ackerman, Lynn	Ackerman, Randy	Ackley, Anne	Ackley, Gwen
ackley, mary	aclupen, joy	Acord, Bill	Acorda, Jenny	Acosta, Elise	Acosta, Erika
Acosta, Erika	acosta, jose	Acosta, seb	Acrr, Judi	Acton-Butner, Eugenia	Acuna, Carina
Acuna, T.	Adaba, Nellie	Adair, Joyce	Adair, Lezetta	Adam, Cheryl	Adam, Najma
adam, roberta	Adamchick, Clydeine	adame, marja	Adames, Lizette	Adami, Leslie	Adamick, Frank
Adamo, Harriet	Adams, Allison	Adams, Alyta	Adams, Brynn	Adams, Carol	Adams, Cathy
Adams, Charlotte	Adams, Daniel	ADAMS, DARRELL	Adams, David	Adams, David	Adams, Debra
Adams, Donna	adams, gail	Adams, Georgia	Adams, Geraldine	Adams, Harriet	Adams, J

Adams, Jennifer	Adams, Jennifer	Adams, John	Adams, Judy	Adams, Katharine	Adams, Katy
Adams, Laura	Adams, Laura	Adams, Lauren	adams, lawrence	Adams, Leslie	Adams, Leslie
Adams, Marita	Adams, Marsha	Adams, Pat	Adams, Paula	Adams, Robert	Adams, Sandra
Adams, Sarah	Adams, Scott	Adams, Scott	Adams, Sena	Adams, Shilo	Adams, Taylor
Adams, Vicky	adams, william	Adams, Winn	Adamson, Claudia	Adarkar, Bharat	Adcock, Marianne
Adcock, Michelle	Addams, Daniel	Addenbrooke, Mirra	Addenbrooke, Rosey	Addington, Lynda	Addington, Paul
Addis, Sarah	Addison, David	Addison, Lindsay	Ade, David	adelman, caren	Adelman, Saul
Adelson, Julie	adera, chai	Adibi, Elise	Adileh, Tareq	Adkins, Crystal	Adkins, Elizabeth
Adkins, Karen	Adkins, Kyle	Adkins, Nancy	Adkins, Rose	Adler, Christopher	Adler, Connie
Adler, Ken	Adler, Matthew	Adler, Sl	Adolay, Barbara	Adrian, Stephanie	Afanasiev, Victor
Afanasiev, Victor	Afelt, Agnieszka	Affolter, Angie	Affolter, Ginger	Affonso, Kristi	afkhami, ali
Afton, Marcia	Agar, Robert	Agarwal, Nitin	Agee, Richard	Aghili, Nooshin	Aglietti, Boomie
Agloro, Jocelyn	Agodoa, Penelope	Agogliati, Judith	Agrest, Inga	Agriopoulos, Danielle	Agro, Joan
aguanno, ann	AGUDA, MIRIAM	Ague, Kate	Aguiar, Ione	AGUILAR JR, REYNALDO	Aguilar, Cynthia
aguilar, emma	Aguilar, Jackie	Aguilar, Lorraine	Aguirr, Tanya	Aguirre, Guillermina	AGUIRRE, JAMES
Aguirre, Pam	Aguirre, Robert	Agvanian, Annie	A'Harrah, Gayle	Ahern, Steve	Aherne, Deborah
Ahlander, Annette	Ahler, M	Ahlers, Kyle	Ahlstrand, heidi lynn	Ahmed, Ilhan	ahmed, mahbub
Ahner, Cynthia	Ahrens, Amy	Ahrens, Ashleigh	Ahrens, Gerry	Ahrens, Jayne	Ahrens, Stacey
Aichinger, Ann	Aid, Jayne	aidala, placid	Aigner, Hertha Claudia	Aiken, Edwin	Aikens, Sonja
Ailey, Bruce	Aines, Nita	Ainsley, Brian	Ainsworth, Carolyn	Ainsworth, deb	Aisling, Sky
Aitcheson, Philip	Aitchison, Henry	Aitchison, Julie	Aitken, Abigail	ajayi, willie	Ajenifuja - El Abed, Ms. Rahmaat
Akana, David	Akand Karan [illegible], Ashni J.	akbari moghaddam, nasrin	Akerley, Nancy	akers, helen	Akers, Kari
Akers, Shelby	akhtab, mikal	Akrami, Jason	Aks, Lana	akturk, ugurhan	Akyuz, Suzan
Alabidi, Torah	Alandete, Laura	Alaniz, Cg	alarid, Claire	Alayza mujica, bernardo	Alba, Eileen
Alba, Sarah	Alban, M. Ann	Alban, Sheila	Albanese, Dawn	Albani, R	Albantides, Danny
Albar, Mike	Alba-Russo, Genieve	Alberhasky, Craig	Albert, Barbara	Albert, Carol	Albert, Damon
Albert, Dortha	Albert, Mary	Albert, Melissa	Albert, Robert	Alberts, Doug	Albertsen, Jennifer
Albertus, Susan	Albino, Betty	Albrand, Julia	Albrecht, Deb	Albrecht, Lonnie	Albrecht, Skyler
Albright, Alexandra	Albright, Chris	Albright, Gary	Albright, Rodger	Albu, Andrea	Alburger, Gabrielle
Albury, Benjamin	Albury, Judy	Alcantara, Anita	Alcott, Vicki	Alden, Rory	Alderette, Gary
Alderman, Mick	Alderman, Nancy	Alderson, Debbie	Alderson, Peter	Aldrich, Hunter	Aldrich, Jim
Aldridge, Laura	Aldrigo, Carla	alduvin, carolina	Alejo, Joshua	Alejo, Maria	alencar, osires
Alessi, Breanne	Alesso, Regina	Alexander Willy, Hope	Alexander, Andrea	Alexander, Andrea	Alexander, Barbara
Alexander, Betty	Alexander, Catherine	Alexander, Charles	Alexander, Charles	Alexander, Cheryl	Alexander, Frederick
alexander, jay	Alexander, Judith	Alexander, Lisa	Alexander, Liz	Alexander, Mark	Alexander, Michael
Alexander, mike	Alexander, Musashi	Alexander, Natalie	Alexander, Rhetta	Alexander, Sharon	alexander, stan
Alexander, Valerian	Alexander, Wanda	Alexander-Brown, Karen	alexanian, christine	Alfano, Joseph	alfimow, beverly
alfimow, beverly	Alfonso, Nadine	Alfonso, Pablo	Alfonso, Robert	Alfson, Lynda	Al-hagin, Salma
ali, arwa	Ali, Azhaar H.	Ali, Onaiza	alibrandi, jill	Alicandu-Thurman, Maria	alicea, Julie
Alicea, Luz	Alimpic, Mick	Allah, Halimah	Allain, Dora	Allain, Mark	Allam, Catherine
Allam, Mary	allan, kay	Allan, Patricia	Allara, David L. and Judith H	Allard, David	Allarde, Lisa
Allbee, Dwight	Allbee, Greg	Allbright, Adriana	Allbritton, Kristen	Alldis, Janis	Allebach, Rick
Allee, Pennelloppe	Allely, Warren	Allen, Amiee	Allen, Ann	Allen, Arthur S.	Allen, Benjamin
Allen, Brian	Allen, Brian	allen, brittany	Allen, Bruce	Allen, Carline	Allen, Caroline
Allen, Carson	Allen, Charlotte	allen, cheryl	allen, christie	Allen, Dakota	Allen, David
Allen, David	ALLEN, DEANNA	Allen, Deborah	Allen, Donna	Allen, Dora	Allen, Doris
Allen, Ford	Allen, Frances	Allen, Glenn	Allen, Holly Alf	Allen, J	Allen, Jeff
Allen, Jim	ALLEN, JOHN	Allen, Joseph	Allen, Judith	Allen, Julie	Allen, Karon
Allen, Katherine	allen, kathryn	allen, Kelsey	Allen, Kimberly	Allen, L	Allen, Laura
Allen, Linda	Allen, Lorna	Allen, Luci	Allen, M	Allen, Mara	Allen, Marcy
Allen, Marjorie	Allen, Marsha	Allen, Mary	Allen, Mary	Allen, Mary Ann	Allen, Melissa

Allen, Melissa	Allen, Michael	allen, neale	Allen, Paula	Allen, Paula	Allen, Rhonda
Allen, Richard	Allen, Robert	Allen, Robert	allen, sally	ALLEN, SAMELLA	Allen, So
Allen, Stephanie	Allen, Susan	Allen, Teresa	allen, turza	Allen, Vernest	Allen, Wendy
Allenbaugh, Jolene	Allewelt, Brittany	Allina-Turnauer, Esti	Allis, Lisa	Allison, Connie	Allison, Jackie
Allison, Janet	Allison, Kathy	Allison, Kelly	Allison, Meridith	Allison, Russell	Allman, Esther
Allon, John	Alloway, Michael	Allphin, Toby	Allport, Hallie	Allred, Janice	Allsop, Roberta
Allsop, Shannon	Allsup, Romalda	Allyn, Anna	Almaguer, Angelica	Almaita, Sammy	Almand, Betty
Almeida, Katie	Almendarez, Mary	ALMERINI, JOAN	Alon, Jan-Paul	Alongi, Michael	Alonzo, Martha
Alonzo, Thomad	Alperin, Mitchell	Alpern, Diane	Alpern, Gloria	Alpers, Nancy	alpert, buzz
Alpert, Emily	Alpha, Ingrid	Alphin, Carol	Al-Qadi, Carolyn	Alrxander, Michael	Alsafi, Catherine
Alskog, Laura	alsobrook, ronald	Alsuraki, Katherine	Alt, Michele	Altavilla, Carol	ALTENHOF, BRENDA
Alter, Carolyn	Alter, Judy	Alter, Kelsey	Alter, Susan	Althaus, Marybeth	Althiser, Kenneth
Althouse, Sherry	Altier, Tracey	Altizer, David	Altman, Myra	Altman, Penny	Altmire, Robert
Altschaft, Sharla	Altum, Angelika	Alunni, Sara	Alva, Susanjane	Alvarado, Gustavo	Alvarado, Javi
Alvarado, Kimberly	Alvarado, Lisandra	Alvarado, Norma	Alvarado, Thomas	Alvarez, Daniel	Alvarez, Daniel
alvarez, eddie	ALVAREZ, EDDY	alvarez, erika	Alvarez, Salvatore	Alvarez, Stephanie	Alvino, Donna
Alward, Wendy	Alykhan, Feisal	Al-Yousuf, Barbara	Alzaga, Roxanne	Alzmann, Maeheah	Amalfitano, Gail
Amalphy, Madeline	Amandi, Nancy	Amann, Janet	amann, skylaar	amare, merkeza	Amarena, Frances
Amari, Aurélie	AMARIEI, LIDIA	Amaro, Hector R.	Amato, Neilia	Amato, Nicole	Amaya, Rosa
Amazzone, Laura	Ambeel, M.	Amberger, Briana	Amberger, Kate	Ambos, Robert	Ambrose, Christine
Ambrose-Jones, Cindy	Ambrosi, Elizabeth	Ambrosio, Antoinette	Ambrozy, Thomas	Ambusavage, Theresa	Amdahl, Erv
Amdur, Angela	Ameen, Arshad	Amelang, Kimberly	Ament, Clarissa	Ames, Jennifer	ames, scott
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Amodeo, Nancy	Amoroso, Amy	Amos, Catherine	Amos, Jerry	Amos, Shari	Ampfer, Patricia
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An, Rose	Anacker, Celeste	Anania, Dale	Anastasi, Teresa	Anastasiou, Theodora	Anaya, Ana
Ancel-Wisner, Annette	Andaloro, Jim	andaluz, vanesa	Ander, Pat	Anderholm, Jon	Anderman, Ian
Andersen, Barb	Andersen, Eric	andersen, erick	Andersen, Karen	Anderson, Al	Anderson, Allison
Anderson, Andrew	Anderson, Angela	anderson, anthony	Anderson, Ashley	Anderson, Aurieanna	Anderson, Barbara
Anderson, Beverly	Anderson, Billie	Anderson, Carol	Anderson, CAROL	Anderson, Carolyn	Anderson, Chris
Anderson, Christeen	Anderson, Christy	Anderson, Craig	Anderson, Crissy	Anderson, Dan	Anderson, Darla
anderson, deborah	Anderson, Denise	Anderson, Dorothy	anderson, edna	Anderson, Eileen	Anderson, Elaine
Anderson, Elizabeth	Anderson, Eric	Anderson, Eric	Anderson, Erik	anderson, gary	Anderson, Greg
Anderson, Heather	Anderson, Helen	Anderson, Holly	Anderson, James	Anderson, Jane	Anderson, Janet
anderson, janie	Anderson, Jay	Anderson, Jennifer	Anderson, Joel	Anderson, John	Anderson, Judith
Anderson, Judy	Anderson, Juliana	Anderson, Julie	Anderson, Julie	Anderson, Karen	Anderson, Karen
Anderson, Karen	Anderson, Kari	Anderson, Karin	Anderson, Kathleen	Anderson, Kelly	Anderson, Larry
Anderson, Larry	Anderson, Lawrie	Anderson, Linda	Anderson, Linda	anderson, lisa	Anderson, Lori
ANDERSON, LYNN	Anderson, Lynn	Anderson, Lynnette	Anderson, Marcia	Anderson, Martha	Anderson, Mary
Anderson, Megan	Anderson, Meghan	Anderson, Michelle	Anderson, Mike	Anderson, Nancy	Anderson, P
Anderson, Pete	anderson, peter	Anderson, Phoebe	Anderson, Rebecca	Anderson, Rev. Meredith	Anderson, Rina
Anderson, Robert	Anderson, Sandra	Anderson, Shirley	Anderson, Shirley	Anderson, Stephen	Anderson, Susan
Anderson, Susan	Anderson, Tacie	Anderson, Ted	Anderson, Tina	Anderson, Tracy	Anderson, Valerie
Anderson, Veronica	Anderson, Victoria	Anderson, Virginia	Anderson, William	Andersson, Ben Oscar	Anderton, Phillip
Andolina, Sylvia	Andon, Joan	Andrade, Celina	Andrade, Elizabeth	andrade, stacy	andre, annmarie
Andre, Dave	Andre, Javier	Andreani, Mary	Andreas, Kirk	andreea, dyana	Andregg, S.
Andres, Anne	andres, eusebio	Andretta, Jeaneen	Andretti, Druscilla	Andrew, Barbara	Andrew, Barbara
Andrews, Anna	Andrews, Barbara	Andrews, Barbara	Andrews, Becky	Andrews, David	andrews, denis
Andrews, Donald	Andrews, Duncan	Andrews, Elizabeth	Andrews, Herb	Andrews, Janice	Andrews, Judith
Andrews, Linda	Andrews, Marcia	Andrews, Marnica	andrews, patricia	Andrews, Rosalind	Andrews, Susan

Andrews, Terry	Andries, Anneke	Andros, Dorianne	Andrychowski, Steven	Andrzeicik, Charlene	Andujar, Julio
Aneja, Aditi	Ang, Lee	Ange, Bob	Angel, Amber	Angel, Elaine	Angel, Heather
Angel, Kelli	angela, giorgia	Angeli, Dana Christine	Angelo, Crystal	Angelo, Neil	Angelo, Sally
Angerhofer, Cindy	Angleberger, Joyce	Angotti, Kathleen	Angress, Miriam	Angst, Kimberly	Anguiano, Carla
Angulo, Andrea	Angus, Billy	Anirudh, Sabi	Anise, Laura	Aniserowicz, Monika	Ann, Kimberlee
Ann, Tina	Anne, Cecily	Anne, Mc Lean	Annecchiarico, Maria	ANovak, AGraff And	Ansbergs, virginia
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Antell, Susan	Anthony, Jocelyn G.. T.	Anthony, Jonathan	Anthony, Judy	Anthony, Paul RW	Anthony, Susan
Antolin, Adriana	antone, essence	Antone, Linda	Antonelli, Stephen	Antoniewicz, Susan	Antonik, Irene
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Apfel, Sarah	Apgar, Susan	apodaca, Doreena	Apollo, John	Aponte, Herb	aponte, kathy
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Appleman, Tara	Apps, Darryl	Aprile, Kathy	Aprile, Oksana	Aprilia, Fitri	aquino, maria
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arana, patricia	arancio, steven	Aranita, Rosita	Aranjo, Armando	arapoudis, sandra	Arapoudis, Sandra
aras, nilly	Araskog, Julie	Araujo, Isabel	Araujo, Jocelyn	Araujo, Linda	Arauz, Renee
Araya, Cindy	Arbogast, Ashley	Arbolaez, Fidel	Arboneaux, Robert	Archambault, Caitlin	Archambault, Jacqueline
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Arias, Ramon	Ariel, Imadiel	Arimond, Helena	Arioli, Manuela	ARISPE, LINDA	Ariza, Felicia
Arizmendez, Eddie	Arizmendi, Donna	Arizona, Liz	arjona, juanita	Arlen, Barbara	Arlitt, Nicole
Armagost, Tom	Armao, Terri	Armas, Martha	Armbrust, Deborah	Armbruster, Jay	armendarez, lisa
Armendariz, Alfonso	armens, karl	Armenta, Suzette	Armentrout, Harley	Armer, Joan/Paul	Armi, Diane
Armigo, Victoria	Armijo, Salme	Armistead, Melinda	Armitage, Chris	Armknecht, Chad	Armm, Edward
Armond, Christine	Armont, Marissa	Armour, Kelly	Armsatrong, Leslie	Armstead, Betty	Armstead, Henry
Armstrong, Adaria	Armstrong, Brandy	Armstrong, Carol	Armstrong, cathy	Armstrong, Cree	Armstrong, Cynthia
Armstrong, Deanna	Armstrong, Dessi	Armstrong, Elizabeth	Armstrong, Fran	Armstrong, Frances	Armstrong, Johnny
Armstrong, Jude	Armstrong, Kelley	Armstrong, Kris	Armstrong, Lori	Armstrong, Patricia	Armstrong, Sara
Armstrong, Sophia	Armstrong, Teri	Armstrong, Tina	Armstrong, Tyler	Armstrong, William	Arnal, Diane
Arndt, Charlie	Arneson, Cindy	Arneson, Dimitra	Arnett, James & Linda	Arnett, Linda	arnett, melinda
Arnette, Wendy	Arnheim, Madeleine	Arnheim, Madeleine	Arnhoff, Stuart	Arnold, Alan	arnold, alyse
Arnold, Angela	Arnold, Ben	Arnold, Carlos	Arnold, Charles	Arnold, Cindy	Arnold, Cynthia
arnold, david	Arnold, David	Arnold, Donna	Arnold, Greg	Arnold, Jack	Arnold, Jaymie
arnold, jeannette	Arnold, Kathryn	arnold, keith	Arnold, Robert	Arnold, Sarah	Arnold, Tammy
Arnold, Toni	Arnold, Tracey	Arnold, Valerie	Arnold, William	Arnold-West, Sandra	Arntz, Deirdre
Aro, Ken	Aron, Peter & Sissy	Aronoff, Nina	Aronow, Myra	Aronson, E	Aronson, Marilyn Singer
Aronson, Randall	arora, Aastha	Aros, Toni	Arosarena, Oneida	Aros-Ponton, Carolina	Arp, Crystal
arpin, susan	Arquette, Cindy	arquilla, vance	Arrif, Vanessa	Arrington, Holly	Arrington, Lisa
Arroyo, Candi	Arroyo, Mima	Arroyo, Olga	Arroyo, Robert & Sally	arsenault, sheena	Arslan, Alper
Arslan, Alper	Artale, Jessica	Artascos, Michele	Artaxet, Jeanne	artemis, diana	Artemyeff, Eugene
Arterian, Diana	Arthur IV, Richard	Arthur, Cheryl	Arthur, E	Arthur, Maria Cristina	Arthur, Pam
Arthur, Paula	Artis, Mark	Artz, Lynn	Arundale, Wendy	Aruva, Venu	Arvola, Andarin
Ary, David	Asara, Lucia	Asbeck, Reinhold	Asbill, Camille	Aschenbrenner, Eva	Ascione, Dorothy
ascolese, cristina	Ash, Jim	Ash, RaeAnne	Ashbaugh, Tom	ashbey, Lucinda	Ashby, Brendan
Ashcraft, James	Ashe, Colleen	Ashe, Samantha	Ashelford, Elsa	asher, Brooke	Asher, Kirstin
Asher, Meredith	Ashley, Alice	Ashley, Claudette	Ashley, James	Ashley, Kayla	ashley, tamara
Ashley, Valerie	Ashman, Brenda	Ashman, William	Ashraf, Rizwana	Ashton, David	Ashton, Linda
Ashton, Shelley	Ashur, Jason	Ashworth, Aubrie	askin, ali	Aslam, Nayeem	Asmus, Sigrid
Asnicar, Elizabeth	ASPINALL, DAVID	Asport, Noemi	Assad, Rose Marie	Asselta, Krin	Assmus, Susan
Astete, Sabina	Astier, Louise	Astorga, Sara	Asturino, Frank	Aszman, Jan	Atallah, Jonathan

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Atkins, Ted	Atkins, Todd	Atkinson, Ben	Atkinson, Chuck	Atmore, Wendy	Atteberry, Kathleen
Atwater, Brigid	Atwell, Janice	Atwell, Judith	Atwood, David	Au, Elsie	auaintance, Howard
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Aughey, Arlene	August, Jane	August, Madison	August, randak	Augustenborg, Rebecca	Augustin, Ellen
Augustin, S	augustine, marian	Auld, Suzanne	aulette, judy	Aulgur, John	Ault, Brian
ault, Tamara	Aultman, Tamela	Auman, Mamie	Aungst, Judith	Aunkst, Daniel	Auris, Jean
Ausbrooks, Heidi	Ausel, Alan	Ausel, Colleen	Auster, Virginia	Austin, Adrienne	Austin, Christine
Austin, Christine	Austin, Diana	Austin, Elizabeth	Austin, Gillian	Austin, joseph	Austin, Lyle
Austin, Lynn	Austin, Rachel	Austin, Robert	Austin, Tammie	Autain, Jacques	Autilio, Anna
autin, michelle	Autry, Anne	Auzins, Helen	Avakova Geary, Svetlana	Avalon, Brittney	Aveline, Connie
Aven, Jamie	Avendnao, Imelda	Averbukh, Sofya	Averett, A.J.	Averitt, Frances	Averitt, William
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Avery, Jennifer	Avery, Simon	Avery, Sonia	Avery, Thomas	Avery-Trujillo, Margaret	AVILA, CARLOS
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Ayala, Stephanie	Ayalin, Ellen	Aydelott, Ruth	Aydelott, Steve	Ayende Córdova, Abraham	Ayer, Todd
Ayers, Frances	Ayers, Frank	Ayers, Kelly	Ayotte, Mabel	Ayoub, Catherine	Ayres, Jordan
Ayres, Patricia	Ayyar, Adarsh	Azar, Francesca	Azevedo, Cindy	Aziz, Iza	Aziz, Mark
Azizi, Amir	Azpurua, Angelica	Azzarello, Joe	B, A	B, Alyssa	b, b
B, C	B, C	B, D	B, Ellen	B, Geo	B, Glory
b, hannah	B, Jay	b, joyce	B, Julianna	B, LETICIA	B, Matt
B, N	B, S	b, s	B, Sharon	B, Shary	B, Susan
B., A.	B., G.	B., Sharon	B.O., Elizabeth	ba, ju	baack, blanche
Babao, Donna	Babayan, Vladislav	Babb, Joyce	Babcock, Grace	Babcock, Helen	Babcock, Miles
Babcock, Reb	Babcock, William	Baber, Osman	Babiak, Marie	Babicki, Paul	Babinec, Kati
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Baca, Jessica	Baca, Marisa	Bacall, Elle	bacardi, kim	Bacchiega, Marco	Bacci, danilo
Baccio, Reid	Bachman, James	Bachmann, Sonya	bachmeier, sara	Bachner, Anne	Bachner, Patty
Bachor, Vernon	Back, Greta	Back, Karen	Backelund, Sandra	Backman, Karen Hedwig	backman, ken
Backman, Kerry	Backs, Csrol	Bacon, Carol	Bacon, Helen	Bacon, Mary	Badame, Sacha
Bader, Judith	Bader, Sandra	Badger, Ben	Badger, Sylvia	Badiong, Estrella	baehr, audrey
Baer, Cynthia	Baer, Holly	Baer, Howard	Baer, Jill	baer, sylviane	Baeza, Rosa
Bafford-Cabrera, Dolores	Bagarotto, Tiziana	bagarotto, tiziana	Bagby, Janet	Baggerly, Roy	Baggett, Derrick
Baggett, Gina	Baggett, Joe	Baglini, Sidne	Baglio, Michael	Bagwell, Amy	Bahleda, Melissa
Bahlman, Nancy	Bahlow, Brian	Bahner, Linda	Bahr, Cheyenne	Bahr, Dennis	Bahringer, Nils
Bahris, Angie	Baier, Mary Ann	Baier, Mary Ann	Baier-Barnes, DeAnna	Bail, Jennifer	Bailes, Mildred
Bailes, Pearl	Bailey, Angie	Bailey, Ashley	Bailey, Bob	Bailey, Brenda	Bailey, Brenda
Bailey, Carol M.	Bailey, Charlene	BAILEY, CHARLES	Bailey, Clinton	Bailey, David	Bailey, Davonne
Bailey, Deborah	Bailey, Janice	Bailey, Larry	Bailey, Margaret Elaine	Bailey, Michael	Bailey, Pamela
Bailey, Sadie	Bailey, Sharon	Bailey, Sharon S	Baileybrown, Sallie	Bailie, Janae	Bailot, kat
Bails, Jean	Bails, Kirk	Baily, Ingrid	Bain, Karen	Bain, Terry	Bainas, Magalie
Bainbridge, Mary-Lynne	Baine, Dave	Bains, Jeffrey	Bair Bachos, Jennfer	Baird, Brian	baird, denise
Baird, Mackenzie	Baird, Marissa	Baird, Randall	Baird, S	Bajwa, Ravinder	Bakaly, Allie
Bakeman, Lisa	Baker Gierlach, Marian and Peter	Baker RN, Kristen	Baker, Alice	Baker, Angie	baker, ariel
Baker, Brent	Baker, Byron	baker, dan	Baker, Danyel	Baker, Dyane	Baker, Francis
Baker, Jan	Baker, Jeanne	Baker, Jodi	Baker, Jolly Sue	Baker, Julie	Baker, Karen
Baker, Kerri	baker, kimberly	Baker, Kristina	baker, lois	Baker, Lynda	Baker, Marci
baker, Margaret	Baker, Marty	Baker, Mary Ann	Baker, Mary Sue	Baker, Nelson	Baker, Norman

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Baker, Vickey	Baker, Virginia	Baker, Webb	Baker-Smith, Gerritt and Elizabeth	Bakkila, David	Bakowycz, Jean
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Balbachevsky, Elizabeth	Balcacer, Stacie	Balcar, Elizabeth	Balch, Joan	Balch, Mary	Balciunas, Ava
Bald, Katie	Baldasari, Lauren	Baldauf, Nancy	balder, james	Baldi, Donna	Baldock, Jason
Baldridge, Noelle	Baldus, Bonnie	Baldwin, Anne	Baldwin, Ashley	Baldwin, Elizabeth	Baldwin, Julie
Baldwin, Laura	Baldwin, Linda	Baldwin, Marilynn	Baldwin, Nanina	Baldwin, Valerie	Bale, Scott
Bales, Brenna	Bales, Susan	Balik, Susan	Balish, Maryann	Ball, Alex	Ball, Ball
Ball, Connie	Ball, Dale	Ball, Elisa	Ball, Jennifer	Ball, Joseph	Ball, JR
ball, laural	Ball, Louise	Ball, Tony	ball, traci	Balla, Sandra	Ballah, Joan
Ballard, Candice K	Ballard, Cecilia	Ballard, Diana	Ballard, Eleanor	Ballard, Emily	Ballard, jacqueline
ballard, kim	Ballester, Iliana	Ballew, Chad	Ballew, Dawn	Ballew, LouAnn	Ballew, Richard
Ballewske, Christine	Balliet, Karen	Ballo, John	Ballou, Jeffrey	Bally, Katie	Balogh, Beth
Balogh, Kathy	balough, patrick	Baltazar, Courtney	Balter, Lauri	Baltin, Brian	Baltrip, Ayana
Balzano, Donna	Balzano, Sharon	Bamberger, Lynn	Bamford, Sharon	Bamford, Susan	Banda, Elisa
Bandel, Doris	Bandelato, Virginia	Bandle, Rolf	Bandy, Jim	Bandy, Shalicia	Bane, Ginger
Bane, Karma	Banes, Debra	Banever, Carol	Banfield, Joan	Bange, Jean	BANGERT, MITCH
BANGERTER, ke	Bangham, Jerry	banham, betty	Bank, Michelle	Banks Johnson, Sabrina	Banks, Andrea
Banks, Dana	Banks, Glen	Banks, Janice	banks, kerry	Banks, Maureen	Banks, nicola
Banks, Phyllis	Banner, Cecilia	Banner, Jayna	Bannister, felicia	Bannister, Julie	Bannister, Susan
Bannon, Edward	Bannon, Kevin	Bannon, Patricia	bansemer, tammi	Banton, Yvette	Banuelos, Anna
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Barajas, Graciela	Baran, Leslie	Barankovich, Amy	Barb, Billie	Barbagallo, Deborah	Barber, Caroline
Barber, Deborah	Barber, Jo	Barber, Ken	Barber, Kenneth	Barber, Marcia	Barber, Mike
Barber, Nick	Barber, Richard	Barber, Viginia	Barbera, Diane	Barberi, Lillyam	barberio, melanie
Barber-Rhone, Dakerri	Barbezat, M.	Barbieri, Lynn	Barbosa, Bárbara	Barca, Erin	barcenilla, Raquel
Barcikowski, Tanya	Barciszewski, Pam	Barclay, Patricia	Barclay, William	Barcott, Nick	Barcott, Nick
Barczak, Lauren	Bardin, Alex	Bardo, Debbie	Bardo, Ellen	Bardun, Deb	Bardy, Barbara J
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Barile, Genevieve	Barkas, Alese	Barker, Anne	Barker, Billie	BARKER, CHERYL A	Barker, Geoff
Barker, Jamie	Barker, Jennifer	Barker, Jerry	barker, joyce	Barker, Linda	Barker, Mary
Barker, Melynda	Barker, Rebecca	Barker, Richard	Barker, Sharon	barkley, stella	Barksdale, Allen
Barlow, Joseph	Barlow, Max	Barlow, Scott	Barman, Laura	Barmann, Adriene	Barmet, Juliette
Barnaby, Karen	Barnard, Charles	Barnard, Jerri	Barnard, Lucille	Barnard, Michele	Barnard, Robert
Barnard, Sandra	Barnes, Alex	Barnes, Alicia	BARNES, ALICIA	Barnes, Amber	Barnes, Ann
Barnes, Austen	Barnes, Carolyn	Barnes, Christy	Barnes, Deborah	Barnes, Denise	Barnes, Doug
Barnes, Mary	Barnes, Melody	Barnes, Michael	Barnes, Michael	Barnes, Noel	Barnes, S
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Barnett, Gene	Barnett, Kathy	Barnett, Shawn	Barnette, Jane	Barney, Lisa	Barney, Valerie
Barney-Campbell, Noenoe	Barnhill, Cara	Barnhoue, Jeanette	Barnickel, Christopher	Barns, Suzanane	Barolsky, Deborah
Baron, Neal	Barone, Harry	Barone, Sharon	Baroni, Theresa	Barr, Ernest G.	Barr, Kathy
Barr, Marjorie C	barr, meg	Barradas, Carlos	Barragan, Rose	Barranti, Giovanni	Barratt, Pam
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Barreiro, Michael	Barrera, Luis	Barress, David	Barreto, Stanley	barrett, audrey	BARRETT, DONALD
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Barrett, Martha	Barrett, Mary	Barrett, Mary Ann	Barrett, Nick	Barrett, Nolen	BARRETT, RACHAEL
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Barringer, Joyce	Barrington, Tim	Barrington-Haber, Aoife	Barrios, Abby	barrios, adriana	Barrios, Enzo
barrios, monica	Barrocas, Gabriela	Barron, Currie	Barron, Ellen	Barron, Lynn	Barrons, Susan
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Barry, Amanda	Barry, Charman	Barry, Dwight	Barry, Heather	Barry, Jane	barry, louise

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Barrymore, Susanne	BARSHAY, DON	Barshis, Jan	Barsky, William	Barsom, Michelle	Barsom, Michelle
Barsoum, Julia	Barstow, Ren	bart, gild	Bartel, Maureen	Bartels, Dieter	Bartels, John R.
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Bartholf, Ron	bartholomew, elizabeth	Bartholomew, Kate	Bartkiw, Danny	Bartlett, Catharine	Bartlett, Charles
Bartlett, David	bartlett, Jill	Bartlett, Larry	Bartlett, Raymond	Bartley, William	Bartoline, Jennie
Bartolomeo, Kathleen	Barton, Cathy	Barton, Diane	Barton, JoAnn	Barton, John&Elizabeth	Barton, Taylor
Bartos, Jim	Barua, Anindita	Baruch, Heidi	Barve, Purnima	Bas, Lauren	Basaj, Andrzej
Bascio, David	Basco, Eric	Basco, Eric	basford, jennifer	Bashaw, Ky	Bashore, Rex
Basiewicz, Kathleen	Basile, Catherine	Basilio, Albert	Basin, Ben	basing, sheila	Basinger, Nancy
Basista, Alexis	Baskett, Michael	basore, karen	Basravi, Salma	Bass, Catherine	bassett, andrea
Bassett, Jaimie	bassett, lyn	bassett, martyn	Basta, Angela	basye, mae	Batch, Louise
Batcheler, Jerry	Batchelor, S	Batchelor, Sue	Bateman Jr, W Glen	Bateman, Amber	BATEMAN, CHERYL
Bateman, Guy	Bateman, James	Batemon, Debora	Bates Nelson, Amy	Bates TIKARI, Julie	Bates, Andrea
Bates, Bette	Bates, Gina	Bates, June	Bates, Karin	Bates, Rachelle	Bates, Ray'Vin
Bates, Sandra	Bates, Shirley	Bates, Tim	Batista, Julie	Batistatos, Athena	batiz, sofia
Battaglia, Alisa	Battat, Ben	Battat, Ovid	Batten, Ellen	batten, jerry	Battis, Chris
Battistessa, Gerri	Battle, Dorothy	Battle, Elizabeth	Baty, Frances	Bauchat, Marilyn	Baucom, Angie
baucom, rolf	Baucom, Wanda	Bauer, Cynthia	Bauer, Daniel	Bauer, Ernst	Bauer, Frank
bauer, karen	Bauer, Kelly	Bauer, Lani	Bauer, Nancy	Bauer, Nicholas	Bauer, Philip
Baugh, kathy	Baughman, Jo Ann	Baughn, Lisa	Baum, Jefferson	Baum, Jolianne	baum, liz
Baum, Margaret	Baum, Miriam	Bauman, Amanda	BAUMAN, BOB	Bauman, Deane	Bauman, Sarah
Baumann, Alan & Janet	Baumann, Deborah	Baumann, Lynn	Baumann, Ruth	Baumer, Diana	Baumgartner, Claudia
Baumgartner, donald	Baumgartner, Lisa	Baumgartner, Mike	Baures, Timothy	Bausch, Robert	Bauser, Stephen
Bautista, Karen	Bautista, Melvin	Bautista, Rutilia	Bava, Elizabeth	Baveld, Ine	baville, mary
Bax, Lawrence	Baxter, Elsa	baxter, george	Baxter, Gina	baxter, jean	Baxter, Julie
Baxter, Martin	Baxter, R	Baxter, Tim	Bayard, Trina	Baye, Deborah	Bayer, Kathy
Bayless, Pamela	bayless, samantha	Bayley, Joan	Baynard, Myriam	Baynton, Janet	Bayod Espoz, Justine
Bays, Amy	BAYSINGER, MARY	Baz, Diego	Bazan, Michele	Bazn, Linda	Bbbb, Debra
Beach, Angie	Beach, Craig	Beach, John	beach, rose	beacham, adele	beacham, jazmin
Bead, Robin	Beakes, Charlie	Beal, Chris	Beal, Elaine	beal, janey	Beall, Dennis
Beall, Wendy	Beamish, Esme	Beamsley, Johanna	bean, elizabeth	Bean, F	Bean, Heidi
Bean, Karen	Bean, Krisallen	Bean, Marina	Beane, Kimberly	Bear, Andrew	BEARD, Diana
Beard, Jeff	Beard, Spencer	Beard, Tommie	Bearden, Elizabeth	Beardsley, Rebecca	Beardsley, William
beasley, debra	Beasley, Gini	Beasley, Stacie	Beasley, Todd	Beatham, Beverly	Beato, Michael
Beato-Lanz, Maria Cristina	Beaton, Deborah	Beaton, Laurie	Beaton, Suzanne	beatrice, sage	Beattie, Jane
Beattue, Jane	Beatty, Chandler	beatty, dana	Beatty, Gwen	Beatty, Raya	Beaubien, Jody
Beaubien, Keeta	Beaubien, Keeta	Beauchamp, belle	Beauchamp, Catherine	Beauchamp, James	Beauchamp, Jan
Beauchamp, Kristin	Beaudet, Aimee	Beaudet, Aimee	Beaudoin, Elizabeth	Beaudrot, Nancy	Beaudry, Heather
Beauman, Scott	Beaumont, Robert	Beausoleil, Thomas	Beaven, Michael	Beaver, Caleb	Beaver, Jim
becerra, alma	Becerra, Anais	Becherer, Dale	Bechmann, Elisabeth	Bechner, Anna	Bechtholt, Susan
BECK, CAROL	Beck, Chris	Beck, EA	Beck, Eric	Beck, Janice	Beck, Jesse
Beck, Melissa	Beck, Sandy	Beck, Sherry	Becka, Ian	Becker, Ami	Becker, Barbara
Becker, Barbara	becker, clay	Becker, Elaine	Becker, Jay	becker, linda	Becker, Vicki
Beckerman, Gary	Beckert, Corin	Becket, Gaabriel	Beckett, Linda	Beckett, Susan	Beckham, Marie
Beckner, Brenda	béclard, sylvie	Becraft, Korin	Bedat, Suzanne	Beden, Laurie	Bedinger, Gail
Bedinger, Gail	Bednarski, Irene	Bedrick, Sue	Beebee, Kara	Beecher, John	Beecken, Tim
Beedle, Tina	Beedy, Ted	Beeman, Amanda	Beeman, Nancy	Beemer, Sandra	Beene, Jerry
Beeny, Diane	Beer, Jenifer	Beer, Julie	Beerman, Adele	Beers, Jodi	Beers, Judith
Beers-Arthur, Maile	Beeson, Becky	Beeson, Michael	Begalske, Leigh	BeGell, Alisha	Begin, Judy
Begley, Matt	Behan, Helen	Behan, Jackolyn	Behenna, Juanita	Behl, Dan	Behling, Gary

Behl-Whiting, Kathy Marie	Behnke, Heidi	Behnke, Kendall	Behrenbruch, Carol	Behrens, Barbara	Behrens, Carla
Behrens, Joanna	Behrman, Irene	Beigel, Doug	Beil, Anita	Bein, Ann	Bein, Keith
Beishir, Olga	Beitel, Timothy	Beitler, Norma	Beitlich, Kris	Bejgrowicz, Thomas	Bekker, C
Belanger, Daniel	Belanger, Heather	Belanger-Iott, Nancy	Beldham, John	Beldin, Joan	Belew, Lynette
Belfer, Morgan	Belford, Paula	Belinfante, Irene	Belize, Samantha	bell, belinda	Bell, Carmella
Bell, Casey	Bell, David	Bell, Donna	Bell, Gillian	Bell, Ginger	Bell, Heather
Bell, James	Bell, James	Bell, Judy	Bell, Julius	Bell, Meagan	bell, patty
Bell, Rob	Bell, Shandra	Bell, Sheila	Bell, Stacy	Bell, Stephanie	bell, susan
Bellacosa, Angela	Bellah, Judy	Bellamente, Emily	Bellamy, Tam	Bellant, Charla	Bell-Brugger, Karen
Bellefontaine, Julia	Bellefontaine, Julia	bellehumeur, tamra	Belli, Bryant	Bell-Kaul, Joan	Bello, D
Bellock, Justine	Bellomo, Stephen	Bellone, Emilia	belloso, jorge	Bellotti, Alice	BellyHoopGoddess, Domina Trix
Belmonte, Betty	Belongia, Terri	Belsley, Cheryl	Belt, Annie	Belton, Lauren	Beltran, Maria dels Àngels
Beltran, Michael	Beltran, Olivia	beltran, tonatiuh	Beltran, Veronica	Beltz, Judith	Belvill, Debra
Belvin, Gregory	Bem, Joelle	Bemer, Lynne	Benac, Heather	Benardo, Sally	Benavidez, Samantha
Benda, Hilarey	Bender, Kae	BENDER, MARIANNE	Bender, Robert	Bender, Thomas	Bendict, L
Bendix, Pamela	Bendziewicz, Richard	Benedetto, Lisa	Benedetto, Mona Stephanie	Benedict, Marc	Beneduce, Roberta
benefield, becky	Benefield, Julie	Beneke, Paula	Benes, Michelle	Benesch, Howard & Susan	Benesovsky, Mary
Benet, Mercedes	Benet, Mercedes	Bengston, Lynn	Bengtson, Molly	Benhaddouch, Lyndsey	Benham, Clifton
BENIC, CLARA	beniger, janine	Bening, Allison	Bening, Allison	Beningo, Shirley	Benitez, Deborah
Benjamin, Christopher	Benjamin, Elaine	Benjamin, Frank	Benjamin, Glenna	Benjamin, Larry	Benjamin, Zoya
benko, john	benkosky, michael	Benner, Susan	Bennett, Braven	Bennett, Brittany	Bennett, Bruce
Bennett, Bryan	bennett, christine	Bennett, Debbie	Bennett, Elizabeth	Bennett, Gabriel	Bennett, Gordon
Bennett, Jason	Bennett, Makala	Bennett, Maris	Bennett, Michael V L	Bennett, Paul	bennett, shelah
Bennett, Steven	Bennett, Susan	Bennett, Tamera	Bennett, Thomas	Bennett, Tiffany	Bennett, Tracy
Bennett, Virginia	Bennett, Virginia	Bennette, Jake	Bennett-Hanchon, Janet	Bennhold, Laurette	Benning, Rex
Benningfield, Amy	Bennion, Beth	Benoit, David	Benoit, Gail	Benoit, Madalyn	Benoit, Marguerite
Benoit, Thomas	Benroubi, Anne	Benschop, Linda	Bensen, Tiffany	bensinger, beatriz	benskin, sandra
benson, carol	Benson, Donnie	Benson, Elise	Benson, Kim	Benson, Mary K.	Benson, Steve
Bentham, Felicia	Benthien, Simone	Bentley, Cynthia	Bentley, Don	Bentley, Gary	Bentley, Kathy
Bentley, Michael	Bentley, Richardson	Bentley, Victoria	Benton, Patty	Benton-Janetta, Lori	Bents, Heide
Bentsop, Trude	bentzel, Jennifer	Benveniste, Anne	Benveniste, Mary	Benzwi, Barbara	Beqaj, Oliver
Berardino, Diana	berario, myra	Berberian, Alex	Berchem, Marie-Ange	Berdeen, Joanne	Berendt, J.
Berezansky, Nick	Berg, Alex	Berg, Julia	Berg, Karen	Berg, Maria	Berg, Mary
Berg, Naomi	Berg, Stan	bergen, jameson	Bergen, Jaye	Bergen, Peggy	Berger, A
berger, barbara	Berger, Becky	berger, cathy	Berger, Frances	Berger, James	Berger, Jenny
Berger, Josh	Berger, Karen	Berger, Linda	Berger, Pat	Berger, Richard	Bergeron, B
Bergeron, Dave	Bergeron, Judy	bergeron, p	bergerud, lisa	Bergey, Nancy	Berggren, Richard
Bergh, Patricia	berghs, lynn	Bergin, Grace	Berglund, Spencer	Bergman, Rachel	Bergmann, Ann
Bergquist, Linda	Bergstrom, Julie	Bergstrom, Ruth	Bergthold, Donald	Berian, nancy	Beringer, Beth
Beringer, Laurie	Berisha, Elma	Berk, Heather	berke, harriet	Berke, Valerie	Berkelman, Laura
Berkey, Kathryn	Berkheimer, Nicole	berkheiser, nancy	Berkley, Leia	Berkley, Miriam	Berkowitz, Carolyn
Berkowitz, Mylene	Berkowitz, Suzy	Berkson, Andrew	Berkson, Steve	Berkvam, Lavonne	Berkvist, Andy
Berl, Diane	Berlau, Alison	Berlich, Helen	Berlin, Susan	Berliner, Diane	Berling, Lyn
berlinghof, bonnie	Berman, Jean	Berman, Juliann	Berman, Leah	berman, libby esther	berman, libby. esther
berman, lindsay	Berman, Nancy	Berman, Pearl	Berman, Steven	Bermea, Laura	Bernaert, Ruthie
Bernal, Antonio	bernal, pablo	Bernard, Laura	Bernard, Lois	Bernard, Lois	bernard, michelle
Bernardo, Kathleen	Bernas, Ed	Berndt, Ann	Berndt, Daniel	Bernett, Cynthia	Bernhagen, Evelyn
Bernhagen, Jeannie	Bernhard, Karen	Bernhard, Lucienne	Bernhardt, Sarah	Bernhardt-House, Phillip	Berniker, Beth
Bernstein, Gina	Bernstein, Jayne	Bernstein, Laura Ann K	Bernstein, Mark	Bernstein, Maxine	Bernstein, Roslyn

Bernstein, Sandra	Bernthaler, Jaime	berntsson, s	Beroza, Connie	Berrier, Carol	berro, graziella
Berry, Amy	Berry, Brenda	Berry, Donald	Berry, Evelyn	Berry, Jeannetta susanne	Berry, Julie
Berry, Kelly	Berry, Kimberly	Berry, Lana	Berry, Linda	Berry, Robert	Bert, Craig
bert, shannon	Bertalan, Henriette	Bertan, Hildegarde	berteaux, claudie	Berteaux, Elizabeth	Bertelsen, Britney
Berthiaume, Joseph	Berthrong, Candace	Berton, Thomas	BERTRAM, HARRISON P	bertrams, michael	Bertrand, Katherine
Bertrand, Paul	Berzac, Susan	Besancon, Maureen	Beschler, Ellen	besly, robycbesly	Bess, James
Bess, rowena	Besserud, Barbara	Bessey, Heather	Bessis, Amber	Bessler, Mike	Besson, Martine
Best, Brenda	Best, Emma	Best, R Teresa	Best, S	Bethmann-Mahooty, Barbara	Betit, Chris
betjemann, theodora	Betkowski, Noelle	Bettendorf, Lisa	Bettenhausen, Elizabeth	Betters, Anna	Betti, Mark
Betton, Gladys	Betts, Cynthia	Betts, Meredith	betts, nicole	Betts, Rick	Betts, Warren
Bettum, Gary	Betz, Bob	Betz, Mike	Beugeling, Door	Beukes, Shelley	Beutel, Teresa
Bevan, Jae	Bevard, James	Bevelaqua, John	Beverage, Bonnie	bevilacqua, simona	Bevsek, Jean
Bewley, Hollis	Bewley, Jerry	Bewley, Julia	Bey, Lisa	Beyer, Janice	Beyers, Alec
Beylen, Diane	Bezerra, Adriana	Bhagat, Brook	Bhagavatula, Akschith	Bhajaria, Nishant	Bhattacharji, Lisa
Bhence, Blaze	Bhend, John	Bhimani, Michelle	Bhj, Hhh	Bhushan, Rani	Biagioni, Peter
Biale, Cheryl	Bialeschki, Charles	Bianchi, Holly	Bianchi, Penelope	Bianco, Celeste	Bias, Julie
biavati, carlotta	Bibb, Erin	Bibel, Barbara	Biber, Rabbi Binyamin	Bice, Alex	Bichsel, Darlene
bick, jennifer	Bickel, Bettina	Bickham, Juanita	Bickhart, Lori	Bickley, John	Bicknell, Mary
Bidarra, Adriana	Biddle, Maxine	Bidon, Carol S	Bidwell, patrick	Bidwell, Troy	Bieber-Hamby, Barbara
Biederman, Sue	Biel, Timothy	Biela, Nicole	Bielaus, Edward	Bielman, Isabel D' Cristo	biemuller, eric
Bien, Annie	bienick, michelle	bienik, j	Bierman, Elaine	Bierman, Joan	Bieszk, Rita
BIFFLE, JOYCE	Big Dick, joseph	Bigelow, Paul	bigelow, sue	Biggane, Michele	Bigger, Melissa
Biggs, A	Biggs, Amy	Biggs, Shar	Biggs, Tiffany	bigler, cliff	Bigley, Kim
Biglia, Monique	Biglow, Anne	bihler, chris	bikaki, stella	Bila, Chuck	Bilderback, Noreen
Bilek, Heidrun	biler, c	Bilgen, Mehmet	Bilicke, Kathy	biljanic, m	Bill, Alma
Bill, Eileen	Billeaud, Ed	Billert, Joseph	Billey, Catharine	billiel, dulcey	Billing, Marc
Billings, Pat	Billington, Danielle	Billmaier, Michelle	Bilodeau, Pamela	Bilotti, Michael	bilwin, gina
Bina, Cyrus	Bina, Cyrus	Binder, Caroline	Binder, Gene	Binder, Tara	Binford, Michelle
Bingham, Charles	bingham, cheryl	Bingham, Shannon	Binion, William	Binkley, Marshall	Binkley, Sherrie
Binns, K	Bintz, Marilyn	Biocca, Andrea	Biondo, Peter	Birch, Tamara	Birchard, Mary C.
Bircher, K Kay	BIRCKHEAD, EMILY	Bird, Cheryl	Bird, Giselle	Bird, Kenneth	Bird, Oscar
Bird, Rhonda	Bird-Fremont, Jeremy	Birdsell, Dale	Birdsong, Pat	Birdwell, Katherine	birgbauer, jeff
Birkenes, Sondra	Birkenstock, Carol	Birkholz, Debra	Birks, Jennifer	birlin, jennifer	birmantas, allan
Birnbaum, Lisa	Biron, Deborah	Biron, Liv	Biryah, Ranjit	Bischoff, Carol	Bischoff, Carol
Bise, Ken	bish, margaret	Bishoff, Donna	bishoff, jane	Bishop, Bonnie	Bishop, Cori
Bishop, Debbie	Bishop, Jacqueline	Bishop, Janie	Bishop, Jayne	Bishop, Joel	Bishop, Liberty
Bishop, Margaret	Bishop, Marian	Bishop, Melissa	Bishop, Melissa	Bishop, Nancy	Bishop, S
Bishop, S	Bishop, Susan	Bishop, William	Biskeborn, Mark	Biskey, Kathy	Bisnett, Marcia
Bissell, Bruce	Bissell, Kim	Bissell, Mary	Bissell, Mary	bissell, tim	Bisson, Michelle
Bissram, Nyla	bitar, helen	Bitsaki, Alexia	bittel, giulia	Bittle, Juanita	Bittle, Sherry
Bittner, Darby	Bittorf, Charles	Bivins, Laura	bivins, pamela	Bixle, Dory	bixler, Michael
Bixter, Pam	Bjork, Nils	Bjorkman, Inge	Bjorkman, Inge	Bjorngaard, Ericka	Black, Andrew
Black, Billy	Black, Chanelle	Black, Dave	Black, Ezrha Jean	Black, Jett	Black, Joyce
Black, L	Black, Lee	Black, Mary Ann	black, matt	Black, Meaghan	Black, Nancy
black, p	Black, Perryy	Black, Robert	Black, Sherry	blackaby, steve	Blackadder, Nancy
Blackburn, Crystal	Blackburn, danny	Blackburn, Donna	BLACKBURN, ERIN	Blackburn, Isabel	Blackburn, Kevin
Blackburn, Lee	Blackburn, Mairgreg	Blackburn, Paul	Blackfeather, Jewel	Blackman, Ian	Blackshear, Sherry
Blackston, Lyn	Blackstone, jo anne	Blackstone, Tabitha	Blackthorn, Tomas	Blackwell, Bruce	Blackwell, John
Blackwell, Sama	Blackwell, Sharon	Blackwell, Thomas	Blackwell-Marchant, Pat	Blackwood, Barbara	Blackwood, Jean
BLADES, GINA	Blaen, A	Blagden, Katherine	Blagen, Jessica	Blagg, C	Blahut, Terri
Blain, Linda	Blain, Susan	Blair, David	Blair, Diana	blair, gary	Blair, Judith
Blair, Linda	Blair, Michelle	Blair, Robin	Blair, Shannon	Blair, Vickie	Blair-Stahn, Chai

Blaise, Sharlane	Blake, Anna	Blake, Bryan	Blake, Charlene	Blake, Cynthia	BLAKE, DARLENE
Blake, Frank	Blake, Janice	Blake, Jocelyn	blake, richard	Blaker, Shawna	Blakeslee, Gayle
blakesley, amy	Blakley, Eric	Blakley, Margaret	BLANCHARD, ASHLEY	Blanchard, Betsy	Blanchard, Cathy
Blanchard, Diane	Blanchard, Joyce	Blanchard, Meredith	Blanchard, Robert	Blanchet, Jocelyn	Blanchett, Laura
Blanchette, Patrick	Blanco, Christian	Bland, Aimee	Bland, Brandy	Bland, Dean	Bland, Emilia
Bland, Monica	Bland, Rick	blandford, mark	Blaney, Carol	Blanford, Julie	Blank, Patricia
Blank, Shelly	Blankenhorn, Elizabeth	Blankenship, Jeannie	Blankinship, Ramona	Blanton, Barbara	blase, ryan
Blase, Sara	blasor, denise	Blaszczak, Lorraine	Błaszczyk, Zofia	Blatman, Resa	Blauer, George
Blaustein, Marvin	Blaylock, Kathy	Bleck, Phyllis	Bleckinger, Dana	Bleckinger, Dana	Bledsoe, Gary
Bleek, Lisa	Bleeker, Nancy	Blefeld, Mauri	Bleifeld, Neil	Blevins, Patricia	Blevins, Twana
Blewett, Christina	Blichasz, Diane	blidar, ron	Blincow, John	Bline, Michele	Bliss, Jenifer
Blitzer, Mark	Bloch, Michael	Block, Clare	Block, Kathryn	Blodgett, Linda	Blomberg, Goran
Blondiau, Inken	Blonsky, Audrey	BLOOM, AL	Bloom, Jim	Bloom, Marcia	Bloom, Richard H. K.
Bloom, Sunny	Bloomer, Tatyana	bloschock, mary	Blount-Powell, Barbara	Blowers, Anne	Blubaugh, Cyndi
Bludau, Kristina	Blue Jay, Joie	Blue, Bobby	Blue, Cindy	Blue, Donna	Blue, Elayne
Blue, Jean	Blue, L	Blue, Larry	blue, leslie	Blue, Mary	Blue, Sherry
Bluhm, Judith	Bluhm, Kathy	Blum, Cheryl	Blum, Katherine	Blume, Gerald	blumenfeld, tom
Blumenthal, Brett	Blumenthal, Robert	Blumert, Joel	Blush, Kelly	Blust, Barry	Bly, David
Blynn, Barbara	Blythe, Billie Sue	Blythe, Frances	Blythe, Linda	Boak, John	boardman, noel
Boatright, Jil	Bobb, Mary	Bobbitt, Tammy	Bobe, Pablo	Bober, Lyn	Bobnick, Jacqueline
Bobo, Kristen	Bobrow, Edwin E.	Bocca, Barbara	Boccagna, Emilia	Bochantin, Leona	Bock, Louise
Bock, Walter	Bockelman, Kathy	Bockino, Alida	bocourt, valerie	Boczan, Jaren	Bodden, William
Boddicker, Ron	Bodell, Anita	boden, jeff	boden, william	Bodenhemier, Alison	bodenmiller, frank
Boderick, Nancy	Bodiford, Sylvia	Bodman, Amy	Bodman, Sharon	Bodnar, Catherine	Bodnar, Geraldine
Bodoh, David	Bodry-Sanders, Penelope	Bodsberg, JJim	Boeckx, Ashley	Boedeker, Deborah	Boehl, Ingrid
Boehler, Karen	Boehling, Robert	Boehm, Richard	Boehm, Robert	Boehmer, Linda	BOELTER, DWAIN
Boerner, Ellen	Boes, Sondra	Bogachus, Lindsey	Bogacki, Paul & Jackie	bogan, ann	Bogan, Debra
Bogan, Robert	Bogan, Susan	Bogard, Cristal	Bogart, Leslie	Bogdan, Emma	Bogdanovich, Susan
Boggio, Laurey	Boggs, George	BOGGS, MICHAEL	Boggs, Nancy	Boggs, Sarah	Bogin, Ronald
Bogios, Constantine	bogle, michael	Bogolub, Larry	Bogs, Cynthia	Bogue, Taylor	Bohac, Stephen
Bohana, Roxanne	Bohannon, Phyllis	Bohannon, Sarah	Bohatch, Oksana	Boher, Beverly	Bohmann, Irene
Bohmfalk, Robert	Bohmsach, Rebecca	bohn, david	Bohn, Elizabeth	Bohn, Kate	Bohn, Tsianina
bohnert, allen	Bohnet, Julie	Boimare, Frank	Boirionnach, Maeryn	Boivin, Gary	Boka, Erika
Bol, Els	Boland, Pam	bolcon, w	bolcon, walter	Bolen, DK	Bolen, Shawn
Bolen, William J	Bolen, William J	Boles, Margaret	Boling, Beverly	Boling, Kay	Bolinger, D
Bolinger, Travis	Bolka, Gail	Bollinger, Karen	Bollini, Margaret	Bollweg, Teri	Bolman, Diane
Bolmer, Edna	Bolnick, Joseph	Bolognini, Francesca	Bolsky, Debbie	Bolson, Jean	Bolster, Carol
Bolt, Merry	Bolter, Diane	Bolton, Angelina	Bolton, Pamela	bolton, pamela	Bolton, Sharon
Bolz, Allene	Bomar, Marsha	bombay, jennifer	Bombela, Olga	Bomberg, Renée C.	Bomblies, Karl and Alida
Bomeisl, James	Bonanni, Loveley	Bonawitz, Jane	Bond, Gaylia	Bond, Jordan	Bond, Susan
Bondarchuk, Nina	Bondoc, Michael	Bonds, Terrie	Bonelli, Gina	bonello, Jeanna	Boneparth, Janine
Bones, Hana	Bonetti, Donna	Bonfield, Barbara	Bonfiglio, Donna	Bongiorni, Diane	Bonham, M
Bonhomme, Sandra	Boniface, Ruth	bonilla, April	Bonilla, Evelyn	Bonilla, Haydee	bonilla, ines
Bonilla, Yadira	Bonini, L	Bonitatibus, Tiffany	Bonk, Denise	Bonk, Marliese	Bonkoski, Jane
Bonnaffon, Heidi	Bonne, Beth	Bonnell, Catharine	bonnell-wenzel, judy	Bonner, Tracey	Bonnett, Andrea
Bonnett, Janice	Bonnett, Nicole	Bonnivier, Carlene	Bonotto, Ann	bonsoer, stephanie	Boodoo, Vijay
Booher, Michelle	bookbinder, maxine	Booker, Nadia	Booker, Stacey	Bookheimer, Donna	Bookout, Shana
Boomhower, Debrah	Boone, James	Boone, Jr., James J.	Boone, Lynn	Boone, Marti	Boone, Merrill
Boone, Vincent	Boorsma, Susan	BOOT, PATRICK	Booth, Carol	Booth, Misty	Booth, Richard
Booth, Tara	Boothe, Dawn	Boots, Sharon	Bopp, Kevin	Borah, Barbara	Borba, Matthew
borboa, summer	Borbolla, Isa	Borchardt, Tamara	Borcherding, Paul	Borchers, Margie	Bordeaux, John
Borde-Dalwadi, Andrea	Bordelon, Janice	Bordelon, Tika	Borden, Susan	bordenave, michael	Border, Cheryl
Borders, Mary	Borek, Adriana	Boren, Ann	Borer, Carrie	Bores, Suzanne	Borgardt, Karen

Borghi, Lisa	borghini, leslie	Borgquist, Ronald B.	Borhan, MAh	Borin, Victoria	Borisen, Judith
Borkowski, Laurie	Borland, Bonnie	born, janet	Bornfreund, Rich	Bornholtz, Gavin	Bornkessel, Scott
Bornnoldt, Ann	Bornstein, Brad	Borod, Karina	Boros, Adrian	Boroshok, Ruth	Borota, Carol
Borowicz, Kathleen	Borrego, Roy	Borrelli, Matthew	Borske, Cindy	Borstel, Eric	Borton, Jennifer
Borton, Jennifer	borys, christine	Borza, Shane	Borzik, Joette	Borzotta, Carol	bos, claudine
Bos, Robin	Bos, Wannes	Bosak, Anthony	Bosar, Richard	Bosch, Heather	bosch, roland
Bosco, Kim	Bose, Joanna	Bosler, Justin	Bosler, Shirley	Bosley, Elizabeth	Bosly, Pamela
Bossa, Jean Rene	Bossinas, Les	Bossone, Lynn	Boster-mark, Judy	Bostic, Marty	Bostic, Sara
BOSTICK, LORRAINE	Bostock, Vic	Boston, Harold	Bostwick, Gary	Boswell, Dale E.	Boswell, Daniel
Boswell, Matthew	Boswell, Pamela	Bothman, Barbara	Botic, Gail	Botkin, Bart	Bottaro, Gina
Bottesch, Marla	Bottleman, Leonard	Bottorff, Virginia	Botts, Andrea	Boucas neto, sarah	Bouchard, Aaron
Bouchard, Aaron	Bouchard, Rita	Bouchard-Shapiro, Kimberly	bouche, Gaëlle	boucher, j	boucher, linda
Boucher, Tasha	Boudreau, Jacques	Boudreau, Lucinda	BOUGAN, PATRICIA	Bougher, Thomas	Bouhalkoum, Victoria
Boujikian, Caitlin	Boulan, Cassidy	Boulanger, Catherine	Boulet, France	Boulton, Barbara	Boumali, Omar
Bourdon, E	Bourgeois, Paula	Bourgeois, Rose	Bourgeois, Sharon	Bourgouin, Renate	Bourke, Jessie
Bourke, Sharon	bourks, claudia	Bourlotos, George	Bourret, Lizabeth	boustani, jean	Bouton, Charles
bouton, mario	boutte', shana	boutwell, mark Boutwell	Bouvier, Philippe	Bouyea, Apolloniabliss	Bouyea, Rose
Bova, John W.	bovee, j	Bovey, Ivy	Bovia, Craig	bovy, fabienne	Bow, Leslie
Bowden, Bernice	Bowden, Joan	Bowden, Joel	Bowden, Karen	Bowden, Karen	Bowen, Bonnie
Bowen, Dane	Bowen, Jocelin	Bowen, Joyce	Bowen, Kim	Bowen, Laraine	Bowen, Pat
BOWEN, Rod	Bower, Julie	Bower, LaNiece	Bowers, Bettina	Bowers, Chad	Bowers, Karen
Bowers, Martha	bowers, mary	Bowers, Shane	Bowland, Denise	Bowles, Robert P.	Bowles, Sherry
Bowley, Adrienne	Bowley, Kat	bowlin, audra	bowlin, Nikita	Bowling, Amanda	Bowling, Keri
Bowman, amy	Bowman, Annita	bowman, b►?rbara	bowman, beverly	Bowman, Brenda	Bowman, Bristol
Bowman, Candy	Bowman, Candy	Bowman, Charles	Bowman, Fred	Bowman, Jason	Bowman, Jason
Bowman, Mary	Bowman, Susan	Bowman, Vanessa	Bowman, Walter	Bowne, Grace	Bowron, Alice
Bowser, Denise	Bowser, Zach	bowyer, inge	Bowyer, Lindsay	Box, Erika	Box, Ken
Boxer, Ewa	Boxhorn, Leslie	BoxleyJimB, Jim	Boyce, Anne-Marie	boyce, dewain	Boyce, Nancy
Boyce, Richard	boyce, shirley	Boyd, Alison	BOYD, CAROL	Boyd, Deborah	Boyd, Diane
boyd, lesa	Boyd, Steve	Boyd, Tobias	Boyd, Vicy	Boyden, Bruni	Boydston, Jean
Boydstun, Susan	Boyer, Jayne	Boyer, Pamela	Boyer, Susan	Boyer, Tim	Boyer, Virginia
Boyette, Judy	Boyko, Trish	Boyle, Alice	Boyle, Lea	Boyle, Mike	Boyle, Pat
Boyle, Patricia	Boyle, Patricia	Boyle, Roxanne	Boylston, Sandra	Boylston, Sandra	Boyman, Jody
Boyne, Jonathan	Boynton, Robin	Boyson, Jenifer	Bozek, David	Bozich, Kathryn	Bozzi, Maryline
Braam, Audrey	Braams, L.	Braband Venayagamoorthy, Gabriele	brabson, bill	brac, raquel	Braca, Diane
Brace, Jennifer	Bracero, Marie	Brachel, Tiana	Brachman, Phyllis	Bracke, Andrew	bracken, denis
Bracken, Fay	Bracken, Kyle	Bracken, Sarah	BRACY, ALFRED	Bradbury, Mitzie	Braddock, Brittany
Braden, Lori	BRADETREET, chip	bradfield, susan	Bradford, Barbara	Bradford, Gloria	Bradford, Katy
Bradford, Leslie	Bradford, Virginia	Bradford, Virginia	bradford, Zachary	Bradish, Barb	Bradley, Al
Bradley, Alistair	Bradley, Breanna	Bradley, C	Bradley, C	Bradley, James & Alice	Bradley, Kathleen
Bradley, Kathy	Bradley, Mark	Bradley, Patricia	Bradley, Randy	Bradley, Stacey	BRADLEY, THOMAS M
Bradshaw, Barbara	Bradshaw, Barbara	Bradshaw, Charles	Bradshaw, Emma	Bradshaw, John	Bradshaw, Nelda
Bradshaw, Susan	Bradsher, Whitney-Bear	Brady McClain, Joyce	Brady, Ann K.	brady, billy	Brady, Daren
Brady, Gail	Brady, Joanna	Brady, Katie	Brady, MerryLee	brafford, carla	Bragg, Emma
Bragg, Terry	Brahm, S	Brainard, Mike	Brainerd, Kay	Braithwaite, Georgia	Braithwaite, Ruth
Braithwaite, Tara	Braman, Micki	Bramblett, Sharon	Bramlett, Mike and Sharon	Bramlette, Jenny	Bramson, Evie
Bramwell, Phebe	Brancaccio, Marie	Brancato, Kelly	Branch, Barbara	Branch, Clair	Branch, Judith
Branch, Keri	Brand, Barbara	branders, joos	branders, joos	Brandes, Michael	Brandes, Richard
Brandes, Susan	Brandon, Kc	Brandon, Michelle	Brandon, Victoria	Brandow, Shanna	Brandt, Cathy
BRANDT, Deborah	brandt, pamela	Brandt, Richard	Brannan, Dion	Brannan, Rosalind	Brannigan, Laura

Brannock, Denny	Branon, Linda	Branse, Dennis	Branstetter, Kevin	Brant, Daniel	Brant, Nicole
Brant, William	Brantley, Robin	Brantley, Tara	branyan, jane	Braoudakis, Spyros	Brasher, Sondra
Brassard, Denise	Bratcher, Carol	Bratcher, Deborah	Bratcher, Dwight	bratcher, katherine	Brats, J
Bratt, Meredith	Brault, Phyllis	Braun, Beth	Braun, Conchita	Braun, Joan	Braun, Joseph
Braun, Julie	Braun, Justin	BRAUN, PAT	Braun, Stephanie	Braunsberger, Karin	Braunschweiger, Angela
Braver, Tayandy	Braverman, Tobi	Bravo, Alexis	Bravo, Carolyn	Bravo, Karen	BRAVO, MARISA
Bravo, Nasli	bravo, william	Brawner, Jacqueline	Brayfield, David	Brayton, Alfred	Brayton, Mary Rose
Brazeau, Theodore	Brazell, Esther	brazelton, brooke	Braziel, jennifer	Brazil, Diane	brazis, chris
Brazitis, Peter	Brazy, Roberto	Breakfield, Sandra	Breaux, Paula	Brebes-Mensah, Naomi	Brebner, Linda
Breckenridge, Katherine	Breen, Barbara	Breen, Mary Ann	breen, mike	Breen, Teresa	Breetzke, Harry
breeze, Richard	Bregant, Cvetka	Brehl, Victoria	Brehm, Lisa	Brehm, Mary	Brehmer, Marcia
Breiby, John	Breier, Rene	Breitenbach, Lou	breitengross, charmaine	Breitman, Barbara	Breivogel, Andre
brekke, sharon	Brellow, Tim	Brelsford, Susanna	Bremer, John	Bremer, Michael	bremier, mary
Bremmer, Cheli	bremmer, faith	Bremner, Debbie	Brendel, Paul	Brender, Teri	brenizer, Elizabeth
Brenn, Dorothy	Brennan Yilmaz, Mary Kate	Brennan, brian	Brennan, Denise	Brennan, John	Brennan, Marie
brennan, marisa	Brennan, Rachel	brenner, diann	Brenner, Joan	Brenner, Joe	brenner, lise
brenner, melody	Brenner, Rum	Brenner, Thomas	Brenner-Miller, Mary	Brensinger, Elizabeth	Brenton, Lily
Brenza, Tina	Brescia, Lydia	Breseke, Jill	Bresett, Bonnie	Bresky, Robert	Breslauer, Lisa
Bresnahan, Mike	Brett, Desmond	Brettner, peter	Brevik, Jeannette	Brewer, Christopher	Brewer, John
Brewer, John	Brewer, Sierra	Brewer, Susan	Brewer, Vickie	Brewer, Vivien	Brewington, Doyle
Brewster, Richard	Brewster, Tina	Brezinka, Hilary	Breznik, Ivana	Bribiesca Hueper, Naira	Brice, Marcia
Bricic, Jasmina	brickner, marvin	Brideau, Corey	Bridgeman, Fred	Bridgeman, Kim	Bridges, Caroline
Bridges, Deborah	Bridges, gena	Bridges, Linda	Bridges, Shane	Bridgett, Jennifer	bridgwood, deanna
Bridwell, Jack	Bridwell, Jack	Brief, Jonathan	Briegel, Kathie	Briel, Peggy	Brigati, Vicki A
Briggs, Carolyn	Briggs, Eleanor	Briggs, Elizabeth	Briggs, Hilary	Briggs, Irene	Briggs, Jacqueline
Briggs, Janice	Briggs, Julia	briggs, keri	briggs, nancy	Briggs, Sandra	Briggs, TJ
Briggs, William	Brigham, Cathy	Brigham, Jeremy	Brigham, Rick	Bright, Arthur	Bright, Bill
Bright, Fionna	Bright, Joan	Bright, Larry	Bright, Leon	Bright, Molly	Brightwell, Lauren & Ginger
Brightwell, Virginia	Briglia, Kim	Brigner, Liberty	Brikker, Michelle	Brill, Beth	Brill, Louis
brillhart, walter	Brilliant, Eleanor	Brimm, Martha	Brincka, Frank A.	Brinda, Valery	briner, brooke
brink, connie	brink, Eric	Brink, Sarah	Brinker, Debra	Brinkerhoff, Irene	brinkle, laurie
Brinkman, Chris	brinkman, kathi	Brinkman, Lisabette	Brinkman, Michelle	Brinley Jr, John	Brinsky, Kristine
Briones, A	Brisebois, Elisabeth	Briskin, Jordan	Bristol, Eleanor	Bristol, Joan	britcher, joyce
Brito, Corina	Brito, leonor	Brito, Marina	Britt, Steve	Brittain, Dennis	Brittain, Jennifer
Britten, Stephanie	britton, barbara	Britton, Joanne	Britton, Karen	Britton, Marva	Britton, Nina
Britton, Tanja	Britton-Mehlisch, Scott	Britzman, Bonnie	BRIZARD, Irene	Brizard, Irene	Broad, Elisa
broadbeck, virginia	Broadhead, Ken	Broadhead, Rebecca	Broadnax, Bart	Broadrick, Michelle	Broadstock, Harold
Brocious, Jo Ann	Brocious, Pamela	brock, alphise	Brock, Annie	Brock, Chris	brock, christina
Brock, George	Brock, Rose	brock, zoe	Brockman, Bette	Brockman, Blaise	Brockunier, Karen
Brodell, R	Broder, Jessica	Broderick, Jack	Brodett, Myra	Brodie, Jeanne	Brodnax, David
Brodsky, Adam	Brody, Alice	Brody, Charlotte	Brody, Tiffany	broekaert, frederiek	broenner, cindra
Broes, Rhonda	Brofman, Steven	Brogan, Hannah	Broleman, Arline	brombach, elizabeth	Bromberg, Lynn
Bromley, Vicki	Bronson, Jonette	Brooke, Dixie	Brooke, Lise	Brooker, Mark	Brookins, Lura
Brookins, Mollie	brookins, norma	brookover, Jeff	Brooks Murphy, Susan Monica	Brooks, Angelika	Brooks, Bob
Brooks, Caitlin	Brooks, Charlotte	Brooks, Christina	Brooks, Daniel	Brooks, David	Brooks, Deborah
Brooks, Diane	Brooks, ed	Brooks, Elizabeth	Brooks, Geri	Brooks, Jeffrey	brooks, Jessie
Brooks, Kendra	Brooks, Kim	Brooks, Mika	Brooks, Mike	Brooks, Nancy	Brooks, Pat
Brooks, TJ	Brooks, Tyler	brooks, valerie	Brooks-Fetty, Cynthia	Broome, Peter	Brophy, Michele
Brophy, Tracy	Brose, Janice	Bross, CT	Brothers, Susan	Brotherson, Ellen	Brotherton, Ms.Valerie C
Brotzman, Alexis	broughton, jamie	Brouk, Ashley	Broussard, Sarah	Brown, A	Brown, Abbey
Brown, Alan	Brown, Aleasha	brown, alonzo	Brown, Alsha	Brown, Amanda	Brown, Amber

Brown, Andrea	Brown, Annette	Brown, ANNIE	Brown, Arlene	Brown, Ashley	Brown, Barbara
Brown, Barbara	Brown, Bets	Brown, Bill	Brown, Billie	Brown, Brad	Brown, Brandye
Brown, Brian	Brown, Bruce	brown, charlene	Brown, Cheryl	Brown, Christiana	Brown, Christopher William
Brown, Craig	Brown, Cynthia	Brown, Darcy	Brown, Dave	Brown, Dawn	Brown, Deb
Brown, Debbie	Brown, Deborah	Brown, Deja	Brown, Denise	BROWN, DENISE	Brown, Diane
Brown, Donna	Brown, Drew	Brown, Duncan	Brown, Ellen	Brown, Emily	Brown, Eric
brown, eric	Brown, Ethan	Brown, Gary	Brown, georgine	Brown, Greg	Brown, Greg&Tina
BROWN, HERMAN	Brown, Ilean	Brown, J.	Brown, James	Brown, James	Brown, James R
Brown, Jane	Brown, Jeannine	Brown, Jen	Brown, Jenine	Brown, Jennifer	Brown, Jennifer
Brown, Jessica	Brown, Joanne	Brown, Joseph	Brown, Joshua	Brown, Julie	brown, kathleen
Brown, Katie	Brown, Kevin	Brown, Larry	Brown, Laura	Brown, Laurie	Brown, Leo
Brown, Leslie Danielle	Brown, Linda	Brown, Lisa	Brown, Lori	Brown, Lyndall	Brown, Makayla
Brown, Margaret	Brown, Marguerite	BROWN, MARIA	Brown, Marilyn	Brown, Mark	Brown, MarvEllen
Brown, Marvin	Brown, Mary	Brown, Mary Beth	brown, midellia	BROWN, MIKO	Brown, Molly
Brown, Nancy	Brown, Nancy	Brown, Nancy	Brown, Norma	Brown, Patricia	Brown, Peggy J.
Brown, R	Brown, Rebecca	Brown, Robert	Brown, Robin	Brown, Roderick	Brown, rosa
Brown, Russell	brown, sabrina	brown, sabrina	Brown, Sally	Brown, Sam	Brown, Sandy
Brown, Sarah	brown, sarah	Brown, Saundra	Brown, Sharon	Brown, Shelley	Brown, Sherry
Brown, Sue	Brown, Susan	Brown, Susan	Brown, Susan	Brown, susan	Brown, Tara
Brown, Terri	Brown, Tom	Brown, Tracie	Brown, Valarie	brown, valerie	Brown, Valerie
brown, vanessa	Brown, Vera	brown, Vickie	Brown, Walt	Brown, William	Brown, William
Browne, Judy	Browne, Nancy	Browne, Wanda	Brownell, Deirdre	Brownell, Kurt	Brownfield, Harry and Mrs. Jill
Browning, Cassandra	Browning, John	Browning, M.	Browning-Gough, Susan	Brownlee, Cathy	Brownlee, Cathy
Brownlee, John	Brown-Ramirez, Michele	Brown-Ryther, Sherry	Broyles, Zelia	Brozek, Celestyn	Brubaker, Angela
BRUBAKER, DAWN	Brubaker, Melissa	Brubaker, Sandy	Bruce, Benjamin	Bruce, Catherine	Bruce, Christina
Bruce, Edie	Bruce, Felicia	Bruce, Jordan	Bruce, Linda	Bruce, Neville	Bruce, Shawn
bruce, suzanne	Bruck, Linda	Brucker, Bob	Brucker, Bob	Brucker, Bob	Bruder, Cheryl
Bruder, Karen	Bruer, Ken	Brum, Morris	brumbaugh, catherine	Brumleve, Charles	Brummette, Carrie
Brumwell, Keith	Brun, Leland	Brun, Nancy	Brune, MJ	Bruneau, Roger	Brunell, Barbara
Brunette, Nicole	Brunetto, Monica	Bruni, Curzio	Brunner, Sharon	Bruno, Barbara	Bruno, JOANNE
Bruno, Luise	Bruns, Carol	Bruns, Emlyn	Brunson, Trixie	Brunswick, Susan	Brunton, James
Brunton, James	Brushaber, Marcie	Bruton, Babette	Bruton, Sandy	Bruun, Shari	Bruyn, Nelleke
Bruyninckx, dirk	Bruzik, Debra	Bruzik, Susan	Bryan, Judy	Bryan, Pat	bryan, stan
Bryant, Altagracia	Bryant, Cade	Bryant, Elizabeth	Bryant, haeleigh	Bryant, Janet	Bryant, Lauren
Bryant, Pamela	Bryant, Patricia	Bryant, Susan	Brycki, Monica	Bryer, Gladys	Bryson, Melissa
Bubb, Ken and Donna	bubenick, jack	Bublin, Harry	Bublitz, Christopher	Bucalos, holly	Bucci, Michael
Buch, Anthony	Buch, Linda	Buchanan, Alysa	Buchanan, Heather	buchholz, laura	Buchsbaum, Judy
Buchter, April	buchwald, mary	bucinskas, zachery	Buck, Barbara	Buck, Ellen	Buck, Shirley
Buckingham, Billy	Buckingham, Megan	Buckle, Leonard	Buckley, Angela	Buckley, Johney	Buckley, Kimberley
Buckley, Maura	buckley, nan	Buckley, Sylvie	Buckley, Terry	Buckley, Vicki	Buckley-Kessler, Virginia
Buckmaster-Kavanagh, jenna	Buckner, Diana	Buckner, Tab	Buckner, Wayne	bucy, ben	Budai, Joan
BUDD, GEORGE	Budde, Sharon	Budry, Robin	Bue, priscilla	Buechler, Laiken	Buehler, Lisa
Buehning, Eamon	Buelens, jaimie	Buenaventure, Eddie	Buensuceso, Antonio	Buesgens, Connie	Buetens, A
Buffa, Leila	Buffer, Anita	Bugaydd, Dawn	Bugg, Ursula	Buhaissi, Eyad	Buhinicek, Jennifer
Buhler, Andrea	Buie, Letha	Bukstein, Katharine	Bulckaen, JP	Bulington, Shannon	Bull, Michael
Bullard, Guadalupe	Bullard, Kathy	Bullen, Grace	Bullen, Joan	Bullen, Rebecca	Bullins, Keith
Bullock, Karen	Bullock, Kathleen	Bullock, Mary	Bullock, Samia	Bullock, Tammy	Bultman, Bernadette
Bumanglag, Marie Fe	Bumble, Reba	Bun, Dots	Bunch, Ellen	Bunch, Robert	bundy, amanda
Bundy, Jessica	Bundy, Robin	Bungarz, Kathleen	Bunge, Delores	Bunge, Denise	BUNKER, TIARA
bunn, maude	Bunn, Sarah	Bunton, Eileen	Buoncora, Yvonne	Buquii, Rita	Burack, Debbie

Buras, Jennifer	Buras, Sandra	Burby, Leah	Burch, MaryAnn	BURCH, MISSY	burcher, thomas
Burciaga, Julie	Burck, Joseph	burcroff, Mary	Burden-McClure, Sara	Burdette, Brent	Burdette, Mary
Burdick, Connie	Burdick, Karolyn	Burdsal, Jeanne	Burens, Roger	Burg, Heather	Burga, Shirley ann
Burge, Dennis	Burgelin, Valerie	Burger, Cathy	Burger, Matt	Burger, Theodore	burgess, allison
Burgess, Betsy	Burgess, Jane	burgess, karuna	Burgess, Linda	burgess, Mary	Burgess, Sara
Burgess, Wendy	Burgos, Anna	burguess, jason	Burianek, Linda	Burianek, Linda	burk, cyd
Burk, Robert	burke, arvel	Burke, Caitlin	Burke, Carla	burke, Gene	Burke, Journey Home, Paul
Burke, Kathryn	Burke, Maureen	Burke, Nancy	Burke, Patricia	Burke, Patty	Burke, Rose
Burke, Rose	Burke, Sandra	Burke, Sharon	Burke, Theresa	Burke, Tom	Burke, Wayne
Burkert, Nancy	Burkes, Sheyril	Burkey, Mae	Burkhalter, Curtis	Burkhard, Stefi	Burkhart, Don
Burkhead, Kelly	Burkholder, Megan	burkholder, megan	Burkinshaw, tim	Burkler, Sebastian	Burleigh, Jonathan
Burleigh, Sara	Burleson, Carla	Burleson, Christina	Burlew, Jessica	Burley, David	Burling, Jean
Burling, Mary	Burlison, Susan	Burn, Shawn	burnett, d	Burnett, David	Burnett, Miyo
Burnett, Phil	Burnette, Susan	Burnham, R. Peter	Burns, Alisa	Burns, Anna	Burns, Bruce
Burns, C.	Burns, Carolyn	Burns, Charlie	Burns, Claudette	Burns, Cotton	Burns, David
Burns, Elizabeth	burns, gina	Burns, Ian	Burns, John	Burns, JUlie	Burns, Karen
Burns, Kathryn	Burns, Laurel	Burns, Mary	Burns, Melody	Burns, Rita	Burns, Robert
Burns, Susan	Burns, Susan	Burns, Tim	Burns, Tracy	burns, virginia	Burnside, Cheryl
Burnside, Marylou	Burnstin, Judy	Burrell, Liza	Burris, Karen	Burris, Nancy	Burroughs, Hayley
Burroughs, Karen	burroughs, lisa	Burroughs, Liz	Burrow, Cindy	Burrows, Andrea	burry, linda
Burson, Grace	Burstein, Mimi	Burt, Annette	Burt, Mary	Burt, Mary	Burt, Peggy
Burt, Stacy	Burt, Susan	Burtch, RaDonna	Burtis, David	Burtness Prak, Karen	Burton, Abby
Burton, Cathy	Burton, Jonathan	burton, martha	Burton, Matthew	Burton, Pat	Burton, Rebecca
Burton, Rick	burton, wendy	Burzinski, Cindy	Busby, Katherine	BUSBY, MELISSA	Busby, Michael
Buscaglia, Louise	buscemi, carlene	busch, mary	Busche, Linda	Buschena, Cindy	Buscio, Ali
Bush, Cathleen	Bush, Elizabeth	Bush, Jackie	Bush, Joan	bush, john	Bush, Julie
Bush, Madeleine	Bush, Sherry	Busher, Donald	bushey, lori	Bushey, Lowell	Bushnell, Amy
Bushnell, Martha	Bushnell, Martha W D	Bushnell, Stephanie	Bushur, Mary	Bushway, Catherine T	Busing, Ashley
Busler, Niles & Michele	Buslot, Chantal	Buss, William	Bussard, Julie	Busse, Doerthe	Busse, Judith
Bussiere, Kathy	Bustamante, James	Bustamante, Luisa	Bustamante, Maria	Buster, Katey	Busto, Rock
Bustos, Lysette	Busuttil-Cashman, Olivia	Buswell, Lori	butcher, joan	Butcher, Judith	butcher, marian
Butcher, Sharon	butkiewicz, mike	Butkus, Ernestina	Butler (geologist), William	Butler, Betty	Butler, Carolyn
butler, chad	Butler, David And Carol	Butler, Edwin	Butler, Francis	Butler, James	Butler, Jane
Butler, Jonny	Butler, Linda	Butler, Lisa	Butler, Maurine	Butler, Melanie	Butler, Merrily
Butler, Michelle	Butler, Paul	Butler, Randall	Butler, Renay	Butler, Renita	Butler, Rich
Butler, Rita	Butler, Sam	Butler, Tim	Butoiu, Ana-Maria	butt, tori	Butterfield, C.
Butterfield, Lisa	Butters, Christian	Buttles, Kate	Buttles, Kathryn	Butts, Alicia	Butts, Judith
Buxton, Julie	Buxton, Raquel	Buzan, Capt.Leslie	Buzgheia, Sara	Buzzacco, Barbi	BVD, J
Byars, Joanne	Byerley, Rebeca	Byerly, Patricia	Byers, Michelle	Byers, Nancy	byers, sharon
Byess, Sharon	Byington, Ruth	Byknish, Chris	Bykonen, Joan	Byland, Hattie	Byland, John
Bynum, Roger	Byrd, Beverly	byrd, charlene	Byrd, Darlene	Byrd, Debra	Byrd, Joan
Byrd, Randi	Byrne, Anthony	Byrne, George	Byrne, Glenn	Byrne, Glenn	Byrne, Julie
Byrne, Nick	Byrne, R	Byrne, Scott	Byrnes, Gerald	Byroadst, Wileen	Byrom, James
Byron, Doug	Byrum, Cody	C Keddy, Shauna	c, a	C, Amanda	C, Diana
c, elaine	C, F	C, G	C, Irina	C, Janee	C, Jessica
C, K	C, L	c, lauren	C, Martina	c, Mary	C, Max
c, mel	C, Midori	c, ned	C, Padma	C, S	C, Shirley
C, T	C., Betty	C., Jolinda	C., Lynne	c., paula	Cabana, Bertrand e
Čabanová, Jana	Cabell, Samantha	Cabezud, Carlos	cabobongan, alexander	Cabot, Jaina	Cabral, Edgar
Cabral, Mason	cabrejas, rodrigo	Cabrera, Ella	cabrera, Victor	Caccia, David	Caceres, Gorgeli
Cachenaut, Shannon	Cacho, Yvonne	Cachopo, Patricia	Cacioppo, Judy	Cada, dorothy	Cadavid, Luis
Cade, Kevin	Cade, Tina	Cadieux, Mary Clare	Cadot, Andrew	cadot, meade	cady, deborah
Caesar, Cheryl	Caetano, Mike	Cafarelli, Cenie	Caffey, Christene	Caffin, Josephine	caffrey, kelly
cafrelli, Beri	Cagle, Amber	Cagle, Mark	Cagle, Michelle	Cahill, Bill	Cahill, Greg

Caiazzo, Joan	caicedo, efrain	Cail, Dean	Caillouette, Brook	Cain, Barbara	Cain, Casey
cain, debbie	Cain, Herman	Cain, Larry	CAIN, LISA	Cain, Michael	Cain, Ruth
Cain, Tamara	Caiola, Janice	Cairns, Dr. Sylvia	Cairns, Jo	Cairns, Kathy	Cairns, Rachel
Caitlin, Sarah	Cal, Maria	Calabrese, Annette	Calalghan, Monica	calamai, barbara silvia	Calambro, Leslie
calame, jane	Calderon, Edye	Calderon, Karla	Calderon, Marvin and Mrs. Sheila	Calderon, Priscilla	Calderwood Mays, Maron
Calderwood, Richard	Caldwell, Charles	Caldwell, Cheryl	Caldwell, Dianne	Caldwell, Elizabeth	Caldwell, Ellen
Caldwell, Jackie	Caldwell, Jesse	Caldwell, Mary	Caldwell, Rebecca	Caldwell, Robert	Caldwell, Scarlett
caldwell, scott	caldwell, sophie	caldwell, susan	Caleb, Debbie	Calebaugh, Candace	Calhoun, Charles
Calhoun, Gail	Calicocat, Valerie	Calise-Simmons, Loretta	Calk, Richard	Calk, Richard	Calkins, Leanna
Call, Christine	Call, Kayla	call, sean	Callaghan, Caren	callaghan, melissa	Callahan, Amalie
Callahan, Chris	callahan, debbie	Callahan, Ellen	Callahan, Keith	Callahan, Maureen	Callahan, Mona
Callahan, Pat	Callaway, Kelly	callaway, lizzy	Callaway, Susan	Calleja, Marta	Callender, Bazy
Calley, Amber	Callian, Francesca	Calliari, Cheryl	Callier, Wendy K	Calligan, Vickie	calloway, kim
Calloway, Zoe	calmese, james	Calton, Phyllis	Caltvedt, Ernest	Caluori, Emil	Calvert, Bruce
Calvin, Betsy	Cama, L	Camacho, Lisa	Camacho, Patricia	Camacho, Tammy	Camardo, Mary
Cambridge, Joyll	Camero, Helene	Cameron, CJ	Cameron, Debra	Cameron, Jean	cameron, joyce
Cameron, Lee	Cameron, Pat	Cameron, Patty	Cameron, Pauline	Camille Bautista, Camille Bautista	Camille, Katie
Camp, Michael	Camp, Michelle	Campagna, William	Campbell Ph.D., Joyce	Campbell, Aileen	Campbell, Allan
Campbell, Amanda	Campbell, Amanda	Campbell, Bailey	Campbell, Brenda	Campbell, Brian	campbell, brian
Campbell, Carol	Campbell, Carolyn	Campbell, Casenthia	Campbell, Charlotte	Campbell, christina	Campbell, Delroy
Campbell, Devon	Campbell, Dolores	Campbell, Donald	Campbell, Donna	Campbell, Gloria	Campbell, Grant
Campbell, Gwendolyn	Campbell, Jan	Campbell, John	Campbell, Joni	Campbell, Kate	Campbell, Kyleigh
Campbell, Laurie	Campbell, Linda	Campbell, Linda	Campbell, Liz	Campbell, Liz	Campbell, Lois
Campbell, Margaret	Campbell, Marshall	Campbell, Mary Ann	Campbell, Michelle	Campbell, nadia	Campbell, Nancy
Campbell, Nancy	Campbell, Rose	Campbell, Sandra	Campbell, Scott	Campbell, Steve	Campbell, Susan
Campbell, Teressa	campbell, vena	Campbell, Yvonne	Campeira, Mila	Campfield, Deborah	Campitelli, Barbara
Camporine, Brandon	campos, Dorothy	Campos, Robin	Camus, Nathalie	Canada II, Riley	Canada, Nara
Canady, Ginny	canales, migdalia	Canalizo, Dorian	Canarsky, Maurine	Canas, Laura	Canavan, Christine
Canavan, Kathleen	cancel, santos	Cancell, June	Canchola, Ellen	Canchola, Maria	Cancilla Herschel, Angela
Candela, Joseph	Candelaria, Gene	Candler, Steven	canejo, theresa	Canfield, Kristine	Canfil, Ellen
Canizares, Gail	Cannata-Nowell, Anita	Cannavan, Melody	Canning, Andriana	Canning, Susan	Canning, Thomas
cannizzaro, vivian	Cannon, Cynthia	Cannon, Eliz	Cannon, Frank	Cannon, Hc	Cannon, Karen
cannon, patrick	Cannon, Thomas	Cannon, Tracy	cannonier, Stirling	Canny, Gail	Cano, Elizabeth
Cano, Elizabeth	cano, marina	cano, martha	Canode, Teresa	Canonica, Charlene	Canova, Josy
Canright, Rebecca	Cantor, Miriam	Cantrell, Dan	Cantrell, Davie	Cantrell, Lyndsay	Cantu, Eva
cantu, lorraine	Cantu, Mary Jo	Cantu, Roel	Cantwell, Chris	Canyonrivers, Pamela	Canzoneri, Donna
Cao, Mary	cap, jennifer	Cap, Max King	Capaccio, Iraida	Capaccione, Jerilyn	Capan, Patrice
Caparas, Samantha	Capello, Cristina	capener, alison	Capich, Fran	Caplan, Elise	caplan, sarah
Caplinger, Harlan	Capobianco, Anthony	CAPONE, SHANTELL	Caponi, Nancy	Capotorto, Jeanette	capotorto, jeanette
Capozzi, Lisa	Capps, Shannon	Capps, Tracy	Cappuccio, Sharon	Caprio, Carole	Capshew, Jeffrey
Capstick, Hilary	Caputo, Jack	Caraballo, Patricia	Carabetta, Gail	Caracappa, Jennifer	Caragol, Lanah
Caralla, Alyssa	Caramico, Jason	Caras, Dimitra	Carathanassis, Manni	CARAVELLO, VICTOR	Carbia, Vanessa
Carbo, Betty	Carbon, Vikki	Carbone, Anne	Carbone, Carl	carbone, chris	Carbone, Desiree
Carbone, Lisa	Carbone, Pasquale	carbone, serena	Carbonneau, Molly-Anne	Carcusa, Joseph	Card, Geraldine
Card, Jessica	Carden, Ben	Cardenas, Luis	Cardenas, Nestor	Cardillo, Roger	cardinal, darlene
Cardinal, Enid	Cardlin, Dorothy	Cardona, Mirna	Cardona, Nydia	Cardone, Tiziana	Cardoso, Patricia
Cardoza, Jennifer	Cardoza, Yahaira	Cardwell, Nicholas	Cardwell, Paul	Careaga, Susana	Caren, Patricia
Carey, Barbara	Carey, Cecilia	Carey, Patricia	Carey, Raymund	Carey, Rebecca	CAREY, THOMAS
Carey-Kearney, David	Carfagna, Flaminia	carfizzi, corrina	Cargill, MK	Carini, Kiriann	Carino, Rowena

Cari-Roberts, Sarah	Carl, Jane	Carl, Juanita L.	Carl, Nancy	Carleo, Elena	Carley, Alysia
Carley, Bill	Carlie, Victoria	Carlile, Katie	Carlile, Michael	Carlill, Neil	Carlin, Jeffrey
Carlin, Shane	Carlini, John	Carlini-Davis, Elaine	carlo, David	Carlo, Raetsch	Carlo, Terry
Carlone, Ruth	Carlos, Melinda	Carlsgaard, Suzie	Carlson, Anne	carlson, carol	Carlson, Corey
Carlson, Dale	Carlson, David	carlson, frieda	Carlson, Joan	Carlson, Joel	Carlson, Judith
Carlson, Karen	Carlson, Lisa	Carlson, Lois	Carlson, Marty	Carlson, Ron	Carlson, Vanessa
Carlsten, Bob	Carlstone, Darry	Carlstroem, Matthew	Carlton, Hawken	Carlton, Robert	Carman, Iris
Carmean, Erin	carmichael, karen	Carmody, Judith	carmona, nathonn	Carneal, Pat	carnes, carol
Carnes, Kristin	Carnes, Stephen	Carne-Smith, Marilyn	Carney, KC	Carney, Michael	Carney, Natalie
Carollo, John	Carolus, Kenneth	Caron, Jessica	Caron, Lou Ann	Caron, Margaret	Caronia, Marcia
Carosella, Christy	Carothers, Steve	Carothers, Thomas	Carpenter, Angelica	Carpenter, Annie	Carpenter, Anpeo
Carpenter, Craig	Carpenter, JB	Carpenter, Marshall	Carpenter, Matthew	CARPENTER, MICHAEL	Carpenter, Rkachea
Carpenter, Robert	Carpenter, Roxanne	Carpenter, Steven	Carpenter, Tasha	Carr, Ann	Carr, Beth
Carr, Colleen	Carr, Edward	Carr, Isabel	Carr, James	Carr, John	Carr, Karen
Carr, Kathy	Carr, M	Carr, Patrick	Carr, Penny	Carr, Renee	Carr, Susanne
Carr, Teddy	Carr, Wayne	carrabba, cheryl	Carranza, Connie	carranza, viktoria	Carrara, Lisa
carrasco, georgia	Carrell, James	Carreon, Patricia	carrero, joss	Carrick, Edith	Carrico, Laura
Carrier, Rebecca	carriere, storm	Carriére, Storm	carrillo, amber	Carrillo, Anjelica	Carrillo, Jessica Victoria
Carrillo, Michelle	Carrillo, REne	Carrington, Gilda	Carrington, Martha	Carrington, Stephanie	Carroll, Bill
carroll, cas	Carroll, Diane	Carroll, Donna	Carroll, Elisabeth	Carroll, Hallie	Carroll, Krista
Carroll, Leslie	Carroll, Linda	Carroll, Margaret	Carroll, Marianne	Carroll, Marlene	Carroll, Maureen T
Carroll, Nancy	Carroll, Nathan	carroll, pat	Carroll, Rosemary	carroll, sara	Carroll, Susan
Carroll-Bradd, Randy	Carso, Deborah	Carson, Catherine	Carson, Dajuana	Carson, Donald	Carson, Millie
Carson, Nancy	carson, sean	Carson, Wendy	Carter Soo Hoo, Linda	Carter, Alexana	Carter, Alicia
Carter, Andrea	Carter, Carla	Carter, Carrie	Carter, Catherine	Carter, Catherine	Carter, David
Carter, Dayle	carter, elaine	Carter, Gary	Carter, Ginger	carter, iames	Carter, Jacqueline
Carter, Janet	Carter, Jeremy	Carter, Kimm	Carter, Lee	Carter, Marcia	Carter, Melanie
Carter, Michelle	Carter, Mina	Carter, Nancy	Carter, Natalie A.	carter, Raegan	carter, rhonda
Carter, Rob	Carter, Ryan	Carter, Sandra	Carter, Shawn	Carter, Susan	Carter, Tammy
Carter, Tara	Carter, Tyler	Carterét, Ryan	carthy, wanda	Cartledge, Pamela	Cartolano, Anita
CARTWRIGHT, BRENDA	Cartwright, Peter	Caruana, Loretta	Caruso Santamaria, Rita	Caruso, Catherine	Caruso, Shannon
carvajal, mauricio	Carvalho, Cibele	Carver, Diana	carver, Marsha	Cary, Martha	Cary, Marti
Casabar, Alicia	Casada, Randi	Casagrand, Mabel	Casale, Albert	Casale, Judith	Casale, Marco
casano, vincent	Casarez, David	Casas, Isabel	Cascadden, David	Casciano, Jeanette	Cascone, Maximilian
Case, Pamela	Case, Samuel	Casebolt, Nicole	Casey, Claire	Casey, Diane	Casey, Diane
Casey, Diane	casey, liz	Casey, Mary	Casey, Tim	Casey, Tonnie	Casey, Veronica
cash, bryan	Cash, David	Cashell, Janice	Cashin, Danice	Cash-Mitchell, Anna	Casiello, Kathy
Casiello, Kathy	Caskey, Jeri	caso, mark	caso, mike	Caspar, Sarah	Casper, Chris
Casper, Jean	Cassady, Marsh	Cassar, Maethese	cassell, mv	cassidy, donna	Cassidy, Elizabeth
Cassidy, Gretchen	Cassidy, Joy	Cassidy, Judy	Cassidy, Laurie	Cassidy, Leslie	Cassidy, Mary Ann
Cassinelli, Pete	Cassis, Kathryne	cASTANEDA, debbie	castaneda, jamie	castaneda, maria	Castaneda, Olga
Castaneda-Mendez, Kicab	Castaway, Karralena	Casteel, Jessie	Casteleyn, Maria	Castell, Tess	Castellaneta, Gina
castellano, cathy	Castellano, Sahron	Castellanos, Genesis	Castellanos, Jeanneathe	Castellano-Usery, Maria	Castellazzi, luigi maria
Castello, Regina	Castellon, Leigh	Castiano, Judith	Castiglia, Denise	Castiglione, Tina	Castille, Juliet
castilleja, karla	Castillo, Araceli	Castillo, Carlos	Castillo, Cheryl	Castillo, Christopher	Castillo, Melinna
Castillo, Theresa	Castine, Patricia	Castine, Timothy	Castle, Bobbie	Castle, William	Castonguay, Cheryl
Castrillo, Lennin	Castriota, Linda	Castro, Bradford	Castro, Daniel	Castro, Louise	castro, Michelle
Castro, Odalys	castro, sirod	Castronovo, Mee-Din	Casu, Silvia	Caswell, Dr. Susan	Caswell, Gail
Catala, Pierre	cataldo, pete	catalina - maria, Hent	Catalona, Michael	Catanese, Ann	catania, nancy
Catanzaro, Darilyn	Cate, Christina	Cateley, Danielle	cathala, corine	CATHELL, KATHRYN	Cather, Corinne
Catherina, Richard	Catherine, John	Cathey, Margaret	Cathleen, Mitchell	Catlett, Ken	Catlin, Christina
Cato, Vickie	Catone, Anna	Catsman-Okkersen, Mariska	Catt, Shannon	Cattadoris, Kamori	Cattell, June

Catterall, Katie	Caudell, Russel	Caudill, Dakota	Caudill, Lindsey	Caughey, Donald	Caulfield, E Frances
Caulton, Gina	caunter, susan	Causey, C	Caust, Martha	Cavalier, Leigh	Cavaliere, Cynthia
Cavallaro, Lenny	Cavalucci, Marius	Cavanaugh, Amy	Cavanaugh, Daniel	Cavanaugh, Sheri	Cavazos, Andrea
Cavell, Jennifer	Caveney, Cathy	Cavey, Robert	Cavuoto, John	Caycedo, Aglaya	cayton, chris
cazee, anthony	Ceaser, Rosemarie	Cebic, Danijela	Cebula, Alison	Cecala, Chrstine	Cecena, Stephanie
Cecil, Michael	Cedillo, Berenice	Cee, Jay	Cefola, Elaine	Cek, Ryan	CELADA, JULIO
Celestino, David	Celler, Carolyn	Celli, Eli	Celli-Jones, Angela	cellucci, mary	Cencula, David
Centner, Randy	cento, salvatore	Centola, Paula	Centorrino, Linda	Cerda, Patricia	Cerda, Rosie
Cerisola, Francesca	Cerne, Linda	Cerny, Jayne	Cerone, Anthony	Cerqueda, Christine	Cerretani, Janet
Cerrone, jane	Cerutti, Rick	Cervantes Andr►s, Julieta	Cervantes, Adriana	Cervantes, Maria	Cervantes, Santos
Cervene, Amy	Cerveny, Avis	CERVERA, ISABEL	CERVERA, ISABEL	Cervone Sauro, Karen	Cescenzo, Annemarie
CESSARI, FULVIO	Cestari, Sonia	Cestaro, Robert	Cetrullo, Darlene	cevasco, john	Chabot, Cristofe
Chacaltana, Elsa	Chacon, Carmen	Chacon, Kaleb	chacon, maricela	Chadwick, Claudia	Chaffin, Barbara
Chaffin, Claudia	Chagnon, Lucille	Chai, Carol	Chai, Sylvia	chain, pearl	Chait, Phil
Chakraborti, Mita	Chakravarty, Shikha	Chakravorty, Serena	Chalfa, Matt	Chalker, Mikki	Chall, Eunice
Challis, Tiffany	Chalmers, Catherine	Chaltraw, Tasha	Chamberlain, Clinton	Chamberlin, Connie	Chamberlin, Linda
Chambers, Allegra	Chambers, Brenda	Chambers, Diana	Chambers, PDiane	Chambers, Robin	chambers, sheila
Chambers, Tammie	Chambless, Dorothy	Chambless, Rochelle	Chambliss, Lesia	Chamorro, Alex	Champagne, Ana
Champagne, Cindy	Champagne, Donna	Champagne, Valerie	Champion, Margaret	Champion, Renee	Chan, B.
Chan, Danny	Chan, Mary	Chan, Sonja	Chance, colette	Chance, Katherine	Chancellor Sr, David
Chandler, Dianne	Chandler, Karen	Chandranatha, Rakesh	Chandy, Dinah	Chang, Bill	chang, jingjing
Chang, Knni	Chang, Patricia	Chang, Paul	chang, sharon	Chanler, Alexander	chantry, florence
chao, ma	chapa, daniela	Chapek, S.	Chapellier, Nancy	Chapman, Alexander	chapman, barbara
Chapman, Bill	chapman, clifford	Chapman, Heather	Chapman, Hellene	Chapman, James	chapman, julie
Chapman, Linda	Chapman, Martha	Chapman, Misty	Chapman, Moira	Chapman, Niels	Chapman, Susan
Chapman, Teresa	Chappel, Tina	Chappell, Becky	Chappell, William	chaput, rachel	charbel Bergmann, Dalia
Charbonneau, Cynthia	Charbonneau, Sheryl	Charbonneau, Susan	Chard, Brian	Chard, Sue	Charest, Catherine
Charland, Barbara	Charlebois, Stacie	Charlemagne, Dulcia	Charles, Barbara	Charles, Jamie	Charles, Simone
Charleston, Shelby	Charlick, Robin	Charlton, James	Charns, Harold	Charobee, Julianna	Charrier, Jenni
Charter, Pat	Chartier, Rosa	Chartier, Thierry	Chase, Elliot	Chase, Felicia	Chase, Janet
Chase, Linda	Chase, Linda	Chase, Sherry	Chastain, Amy	Chastang, Mary	Chasteen, Don
Chatfield, Nicholas	Chatigny, Diane	Chatlain, Clark	chatman, lynda	Chattley, Anthony	Chatwell, Christine
CHAUDRY, MUHAMMAD	Chavez, Alejandra	chavez, angelique	Chavez, Angie	Chavez, Luz	Chavez, Nola
Chavez, Phyllis	Chawla, munish	Chayes, Kris	Cheang, Alice	Cheatwood, Keagan	Checker, Nicholas
Cheek, Deborah	Cheeseboro, Margrit	Cheesman, Jean	Cheesman, Lois	Chelednik, Mike	Chen, Allan
Chen, Angela	Chen, Emilie	Chen, Fang	Chen, Katelyn	chen, kim	Chen, Lena
Chen, Linda	Chen, Sunny	chen, Vivian	Cheney, Derek	Cheng, Chiu	chennupati, sudha
chepeska, jan	Chepurny, Theresa	Cherdon, H	Cherico, Ruth	Cherlin, Anita Gyojin	Chernoff, Elaine
Cherry, Ann	Cherry, Christel	Cherry, James	Cherry, Shirley	Cherubin, Elizabeth	chervenak, barbara
Chesire, Lynne	Chesney, Angela	chesney, valerie	Chesnoff, Lissa	Chesser, Cathy	Chesson, Kwame
Chester, Philip	Cheston, Frances	Chevalier, Deborah	Chevere, Yadira	Chi, AniMae	Chi, AniMae
Chi, Sarah	Chiabai, Simone	Chiao, Alice	chiarella, catalina	Chiasson, Dan	Chiasson, Erin
Chiavaroli, Mary Beth	Chichester, Barbara	Chickman, Sue	Chico, Nancy & Abisai	Chilberg, Kari	Chilcote, Marilyn
Child, Adelajda	Child, Jan	child, katrina	Childers, Amie	Childers, April	Childers, Randy
Childress, Steven	Childs, Anna	childs, Melissa	Childs, Patricia	Childs, Susan	Chiles, Dawson
Chill, Deborah Lee	Chimiklis, Lynne	Chin, Eugene	Chin, Janice	Chin, Joan	Chin, Suzan
Chinellato, Angelica	Chinigo, Brittany	Chiocca, Steve	Chiolino, Lori	Chipman Sisson, Valerie	Chipoletti, Marilee
Chiquoine, Selinda	Chirpin, Robert	Chisari, Andrea	Chisholm, Holly	Chisholm, Kelly	chisholm, miriam
Chittim, Veroune	Chitwood, Jacklyn	Chiu, Albert	Chiu, Kevin	Chizmar, Gregory	Cho, T
choate, Pamela	Choi, Brenda	choi, Jenny	Choi, Kay	Choi, Kelly	Choker, Ashley
Chongtham, Monica	Chop, Charla	Chopyak, Anne	Chorney, Kandace	Chou, Ana	Chow, Lydia

Chowdhry, Carol	Chowen, Carole	Chrebtow, Alicia	Chrissos, H.L. Chris	Christ, Alexander	Christ, M'Lou
christ, shirlene	Christ, Silvia	Christ, Tam	Christenberry, Ian	christensen, candace	Christensen, Debora
Christensen, Harriet	Christensen, Heather	Christensen, Heidi	Christensen, James	christensen, Teresa	Christensen, Walter
Christenson, Amy	Christenson-Nutt, Tracy	Christian, Adina	Christian, Barbara	Christian, Brian	Christian, Connie
Christian, Jadie	Christian, Karen	Christian, Kathryn	Christian, Linda	Christian, Michelle	christian, pamela
christian, sheri	Christian, Tyler	Christiansen, Candace	Christiansen, Claudia	Christiansen, Karen	Christiansen, Sadie-Anne
Christiansen, Sharon	Christianson, Chris	Christianson, Greg	Christianson, Mathew	Christie, Bill	Christie, Christopher
Christie, Kathy	Christie, LeeAnn	Christie, Sarah	Christie, Staci	Christie, Susan	Christine, Joel
Christman, Dave	Christman, Mary	Christman, Mary	Christo, Jeffrey	Christofersen, Howard	Christoff, Stephanie
Christoffer, Courtney	Christofferson, Irene	Christopher, Sandra	Christopherson, Susan	Christwitz, William	Christy, Christy
Christy, Mary	christy, Phillip	Chrupka, R	Chrzanowski, Lynne	Chrzanowski, Lynne	Chu, J
Chu, Jonathan	Chu, Nancy	chu, sandra	Chu, Valerie	Chudzik, Mark	chulakh, tatiana
Chumbley, Jim	Chun, Gail	Chun, Jean	Chun, Melissa	Chung, Chanil	Chung, JiYoung
Chung, Marcus	Church, Aimee	Church, Jan	Church, Shennel	Churchill, Carol	Churchill, Danette
Churchman, Pat	Chyburayev, Sergey	Chynoweth, Iris	Ciao, Gianna	Ciavatti, Ralph	Ciccketti, Kerri
Cicoria, Eva	Cieloha, James	Cieplinski, Debbie	Ciesielczyk, Kay	Ciesielski, J.B.	Cieutat, Denise
Cifrodelli, Melissa	CILIONE VetPATRIOT, BRUNO F.	cimadevilla, diana	Cimino, Maryrose	Cimperman, Katherine	Ciolli, Diana
Cipikova, Jana	Cipolla, Julie	Ciporkin, Kasea	Ciri, Sharon E.	Ciriacks, Dan	Cirigliano, Leslie
Cirne lima, Henrique	Cirulnick, Paul	Cisko, Christina	Cisna, Todd	cisneros, bert	cisneros, edwin
ciszak, anthony	Ciszewski, Judy	Citizen, Concerned	Citron, Jean	Citron, Richard	Ciuro, Dana
Civgin, Sarah	Civitelli, Susan	Clabo, Jane	Clabough, Emily	Clack, Musty	Claeys, Rod
Clagett, Ione	Clagett, Robert	clanahan, ceci	Clancy, Marty	Clancy, Nyack	Clapham, Boz
Clapp, Angelina	Clapp, Jonathan	Clapp, Leslie	Clapper, David	Clardy, Debbie	Claridge, Inga
Clark Jr, James A	Clark, Amanda	Clark, Angela	Clark, Anne	Clark, Barbara	Clark, Barbara
Clark, Billie	Clark, Brittany	Clark, Brittany	Clark, Cameron	Clark, Carolyn	clark, cate
Clark, Cheri	Clark, Chris	Clark, Diane	Clark, Diane	Clark, Doni	Clark, Elyse
Clark, fred	Clark, George	Clark, Howard	Clark, J	Clark, Jamie	Clark, Jason
Clark, Jean	Clark, Jennifer	Clark, Joan	Clark, Josh	Clark, Julie	clark, kathy
Clark, Kent John	Clark, Kris	Clark, Laura	Clark, Leigh	Clark, Linda	Clark, Lucy
Clark, Lynne	Clark, Morgan	Clark, Nancy	Clark, Nina	Clark, Paula	Clark, Rebecca
Clark, Sarah	Clark, Scott	Clark, Sherry	CLARK, SHERRY	Clark, Stacy	Clark, Stephanie
clark, steve	Clark, Susan	Clark, Toni	Clark, Warren	Clark, William	Clarke, Annie
Clarke, Barbara	Clarke, Barbara	Clarke, Beverly	Clarke, Candy	Clarke, Darrell	Clarke, Karen
clarke, kathleen	CLARKE, KIP	Clarke, Lori	clarke, mary	Clarke, Michael and Jeanine	Clarke, Robert
clarke, seth	Clarke, Thomas	Clarkin, Sean	Clark-McKitrick, Blythe	Clark-Reeves, Vicki	Clarkson, Courtney
Clasen, Martha	class, Julie	Classetti, Ethan	Claunch, Helen	Claunch-Meyers, Jennifer	clausen, Nina
Clavet, Justin	Clavijo, Ileana	Clay, Corinne	Clay, Gretchen	Clay, Jennafer	Clay, Robert
Clay, Susan	Clay, Todd	Clay, Yolanda	Clayborne, Chris	Claycomb, Gail	Claymore, Thomas
Claypool, Roberta	clayton, diane	Clayton, Irinar	clayton, margarita	Clayton, marlena	Claytor, Patricia
Cleary, Christopher	Cleary, Colleen	Cleary, Karen	Cleary, Marlena	Cleary, Robyn	Cleaver, Anita
Cleaver, Tracy	Cleaves, Robyn	Cleerdin, Liz	Clefstad, John	Cleland, Linda	Cleland, Patricia
Clem, Ella	Clemens, Beatrice	Clemens, David	Clemens, Susan	Clemens, Sydney	Clemenson, ann
clement, christina	Clement, James	Clement, Jean	clement, john	clement, kevin	Clement, Terrell
clemente, claudia	Clemente, Ilda	Clements, Carol	Clements, Joyce	Clements, Kathy	CLEMM, BRITT
Clemons, Edith	Cler, Kat	cleveland, benny	cleveland, Charles	Cleveland, Jill	Cleveland, Joel
Cleven, Heidi	Clevenger, Lynne	Clevenger, Sarah	Clewett, Barbara	Click, Mark	Click, Sue
Cliff, Elizabeth	Clifford, Ann	Clifford, Kay	clifford, Lindsay	Clifton, Donna	Clifton, Nora
Clifton, Ronald	Clifton, Rosalyn	Clifton, Wendy	Clifton, William	Climacoclark, Alexander	Clinch, Farah
Clinch, Paul	cline, katelynn	Cline, Shawn	Clinger, Linda	Clinton, Gary	Clodfelter, Leigh
CLOSS, JAMES	Clossey, Lee	Closson, Susan	clotworthy, shawn	Cloud, Brett	Cloud, Jarrett

Cloud, Lonny	Cloud, Michelle	Clough, Francine	Clouser, Bonnie	Clowe, Sarah	Cloyd, Hali
Clukey, Charlene	Clute, Lorraine	clutts, pamela	Co, Cvm	Coady, Mary	Coahran, Scott
Coakley, Jody	Coan, Brenda	Coates, Mark	Cobb, Diana	Cobb, Kathryn	cobb, robert
Cobb, Sandra	Cobb, Tanya	Cobeen, Bruce	Cober, Ron	cobo, sonia	Coburn, Della
coburn, karen	coburn, Stephanie	Cochran, Ardys	Cochran, Joyce	Cochrane, John	Cock, Christine
Cocke, Sandra	Cockrell, Ernest	Cockrell, Jennie	Cockrell, Marti	Cockrum, Kathy	Cody, Jeff
Cody, Sheila	Coe, Dianne	Coe, Joyce	Coe, Tirza	Coebergh, Philip	Coeburn, Jeanette
Coelho, Shirley	Coffee, Eileen	Coffee, Paula	Coffey, Jill	Coffey, Margery	Coffey, Renata
Coffey, Tanya	Coffi, Susan	Coffman, Hannah	Coffman, Kathleen	Coffman, Lauri	Coffroad, Carrie
Cogar, Nicole	Cogburn, Patty	Coggins, Giana	Cogswell, Andie	Cohan, Clara	COHEN MD, Robert M
Cohen, Andrew	Cohen, Ann	Cohen, Benita	Cohen, Bruce	Cohen, Claire	Cohen, Donna
Cohen, Edith	Cohen, Eleanor	Cohen, Ellen	Cohen, Friend	Cohen, Harriet	Cohen, Howard
Cohen, Howard	Cohen, Hyman	Cohen, Isabel	cohen, jory	Cohen, Judith	Cohen, Judy
Cohen, Judy	Cohen, Karen	Cohen, Karla	Cohen, Kim	Cohen, Marcie	Cohen, Marilyn
Cohen, Marilyn	Cohen, Mark	Cohen, mark	Cohen, Melanie	Cohen, Rachel	Cohen, Sandra
COHEN, SANDY	Cohen, Steve	Cohen, Susan	Cohen, Wendi	Cohen, Wendi	Cohill, Michael
Cohler, Ellen	Cohn, Jacqueline	Cohn, Louise	Cohn, Steve	Coiner, Diane	Coke, Yvonne
Cokeley, Christi	Coker, Azucena	Coker, Kat	Coker, L	Coker, Pamela	Colaco, Lucia
Colangelo, Annapoorne	Colavito, Christina	Colberg, Edwin	Colbert, Amanda	Colburn, Sean	Colby, Candace
Coldwell, Sherilyn	Cole, Brenda	cole, brian	Cole, Cal	Cole, Charles	Cole, Dale
Cole, Deborah	Cole, Dori	Cole, Dori	Cole, Dorothy	Cole, Gloria	Cole, Helen
Cole, Joan	Cole, John	Cole, Judith	Cole, Kathleen	Cole, Katy	Cole, Kayla
cole, laura	Cole, Linc	cole, marilyn j	Cole, Martha	cole, mary	Cole, Mary Lou
Cole, Pat	Cole, Paul	Cole, Ruby	Cole, Sandra	Cole, Tracy	Cole, Tracy
Cole, Tracy	Colee, Tanya	Coleman, Carol	Coleman, Claire	Coleman, Colleen	Coleman, David
Coleman, David	Coleman, Ellis	Coleman, Frances	Coleman, Gerald	Coleman, John	coleman, judy
Coleman, Lori	Coleman, Melissa	Coleman, meri	Coleman, Robert	Coleman, Sandra	Coleman, Vallena
Cole-Martin, Judy & Ed	Coleri, Nilgun	colerich, edward	Coles, Christopher	Coletta, Jennifer	Coletti, Donna
Coletti, Lori	Coley, Rebecca	Colgan-Davis, John	Colin, Lisa	Colina, Marsha	Collar, Martin
Collas, Judith	Collazo, Sandra M	Collazo, Sandra M.	Collette, Marie	Colletti, Kathy	Collier, Angel
Collier, Barb	Collier, Chandra	Collier, Don	Collier, Gg	Collier, Jo	Collier, Lonny
Collier, Quinten	Collier, Sandy	Collier, Susan	Colligan, Carol	Colliins, Virginia	collimore, robert
Collins, Alison	Collins, Amanda	Collins, Barbara	Collins, Carol	Collins, Craig	Collins, Dan
Collins, Debbie	Collins, Denise	collins, gerry	Collins, Gilbert	Collins, Greg	Collins, Janet
collins, joyce	Collins, Kathy	Collins, Kelly	Collins, Larry	Collins, Laura	Collins, Marty
Collins, Michele T	Collins, Mimi	Collins, Nicole	collins, peter	Collins, Randall	collins, richard
Collins, Sheryl	Collins, Steve	Collins, Teresa	Collins, Virginia	Collishaw, Llinda	Collmer, Sarah
Colloby, Cecily	Collver, Julie	Colman, Pete	Colon Monette, Rachel	Colon, Carlos	colon, eli
colon, emilia	Colon, Farrah	Colon, Kathy	Colon, Lorna	Colon-Lugo, Heidy	Colonna, Mary
Coloos, Brigitte	Colovos, Nick	Colquitt, Clare	Colson, Clay	Colson, Lynn	colston, casey
Colston, Laura	Coltharp, Debbi	Coltman, Evelyn	Colton, Cammy	COLVER, TERRY	Colvin, Amy
COLVIN, KATHLEEN	Colvin, Linda	Colvin, LouAnn	Colwill, Kathleen	Colyer, John	comacchio, silvana
Comas, Maria	Combes, Dale	Combs, Debi	Combs, Donna	Combs, Laura	Combs, Lizzy
Combs, Mary Anne	Comeau, James	Comella, John	Comer, Dosche	Comet, Paul	Comley, Nikki
Commander, Lorayne	Commarata, Anthony	Commarata, Rev. Anthony	Commercon, Joyce	Compton, Betsy	Compton, Deb
Compton, Lena	Compton, Vanessa	Comrack, Janine	Conant, Deborah	Conant, Martha	Conaway, Tara
concepcion, vickie	Conde, Marina	Condit, Larry	Condon Krieger, Janet	Condon, Marlene	Condon, Pat
Cone, Margaret	Conelley, B.	conforti, brooks	CONFORTI, DEBRA	Congelio, Rie	Conger, Barbara
Conigliaro, Vito	Conklin, Crystal	Conklin, Jack	Conklin, Joyce	Conklin, Lindsay	Conlan, Elizabeth
Conlan, Mark	Conley, Donna	Conley, Jan	Conley, Lori	Conn, Candace	conn, craig
Conn, Daniel	Conn, Elizabeth	Conn, Gerrilynn	Conn, Patrick	Connell, Roy	Connellan, Amy
Conner, Carley	Conner, Carolyn	conner, christina	Conner, Eileen	conner, kathleen	Conner, Laura
Conner, Lisa	Conner, Lisa	Conner, Ruth & Jerry	Conner, Sarah	conner, stacy	Conner, Teresa

Conner-Castles, Lura	Connery, Matthew	Connick, Cherie	Connolly, Charles	Connolly, Joe	Connolly, Marsha
Connor, Arthur	Connor, Cindy	Connor, Kristin	Connor, Mina	Connor, Phillip	Connor, Thomas V.
Connors, Elouise	Conoboy, Carol	Conoscenti, Paula	Conrad, Michele	Conrady, Donna	conrath, chris
Conrow, Bonnie	Conroy, Beverly	Conroy, Faith	Conroy, Jim	Conroy, Laurie	Conroy, Peggy
Conroy-Salbi, Marie	Consavage, Janet	Conselyea, Jannis	Consoli, Leonora	constantinescu, dan	conte, martha
Conti, Joanne	Conti, Margaret	Conti, Shanie	Contreras, Cristian	Contreras, David	Contreras, Isela
Contreras, Stacey	Contreras, Tricia	Converse, Jocelyn	Conway, Clayton	Conway, Tonja	Conwell, Janet
cook, ashlee	Cook, Bruce	Cook, Carol	Cook, Catherine	Cook, Catherine	Cook, Charlotte
cook, Craig	cook, darren	Cook, Denise	Cook, Dyanne	Cook, Elaine	Cook, Elvira
Cook, Gary	Cook, Gary	Cook, James	Cook, Jasmine	Cook, Joe	Cook, Karen
Cook, KayLouise	Cook, Linda	Cook, Lynn	Cook, Marianna	Cook, Mary	Cook, Monika
Cook, Rosa Maria	Cook, Steven	Cook, Susan	Cook, Susan	Cook, Vanessa	Cooke, Douglas
Cookson, Elaine	Coolahan, Mary	coolahan, mary	Coolen-Derosier, Cheryl	cooley, john	Cooley, Marian
Cooley, Richard	Coolidge, Rebecca	Coombs, Joyce	Coon, Randal	Cooney, Laura	Coons, Ryan
Coons, Victoria	Coons, Wayne	Coop, Lindy	Coop, Sherri	Cooper, Aleta	Cooper, Andrea
Cooper, April	cooper, april	cooper, beatrice	Cooper, Betty	Cooper, Beverly	Cooper, Carol
cooper, christy	Cooper, Dee	Cooper, Gary	Cooper, Isabella	Cooper, James	Cooper, Julia
Cooper, Kathryn	Cooper, Lashaunta	Cooper, Leann	Cooper, Marie	cooper, marilyn	cooper, michael
Cooper, Natalie	Cooper, Paula	Cooper, Rich	Cooper, Robert	Cooper, Sandra	Cooper, Sandy
Cooper, Susan	Cooperrider, Justin	Cootz, Candace	COOVER, TINA	Cope, Kendra	Cope, Linda
Cope, Peggy	Cope, Sandra	Cope, Wendy	Copeland, Jeanette	Copeland, Leon	Copeland, Marion W.
copeland, mark	Copeland, Rebecca	Copeland, Steven	Copeland, Sue	Copenhaver, Kenneth	Copenhaver, Patricia
Copetallus, Siyus	Copley, Lauren	Copperberg, Taylor	Coppola, Brian	Coppola, Frances	Coppola, Stephanie
Coppotelli, Fred	Coppotelli, Heide	Coppotelli, Heide Catherina	Copur, Serdar	Cora, Kaitlyn	Corazzato, Claudia
Corbeil, Kim	Corbett, Anneke	Corbett, Cecly	Corbett, Clivonne	Corbett, Frances	Corbett, Joseph
Corbett, Mary	Corbett, Randy	Corbin Beaver, Pamela	Corbin, Daniel	Corbin, Marion	Corbin, Norman
Corbin, Patricia	Corbin, Sean	Corby, Kathleen	Corcoran, Kerry	Corcoran, Laura	Corcoran, Mike
Corcuera, Nelson	Cordell, Marguerite	Cordero, Ann	Cordero, Mercedes	cordero, phyllis	Cordery, Laura
Cordes, Alexandra	Cording, Harry	Cordova, Isabel	Cordova, Stephanie	Cordova, Ute	Cordova, Xochitl
Cordts, Barbara	Cordts, Kypfer	Corean, Cynthia	Corella, Tania	Core-Stine, Erin	Corey, Heidi
Corey, Paul	Corio, Joe	cork, sue	Corkey, Peter	Corley, Bert	Corliss, JUlia
Corliss, Nan	Cormack, Chereale	Cormier, Deanna	Cormier, Kim	Cornelia, Jared	Cornelius, Don
Cornelius, Lea	Cornelius, Michele	Cornell, Hannah	cornell, sherry	Cornelsen, Christy	Cornely, John
Cornett, Gary	Corniell, Steven	Cornish, Peggy	Cornwell, John	Corona, Angelina	Corona, Laura
Corona, Marianne	Corona, Norma	Coronis, Jonah	Correia, Cecilia	correia, claudia	correia, claudia
Correia, M. Cecilia	Correll, Chuck	Corriere, Caryn	Corrigan, Sean	Corris, Joshua	Corriveau, Kevin D.
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Cortese, Danielle	Cortez, Arizona	Cortez, Cherie	Cortez, Jessica	Cortez, Leticia	Cortimilia, Uta
Cort►s Morales, Cristian	Corum, Kay	Corwin, Catherine	Corwin, Diana	CORZO, jackeline	cosey, elnora
Cosgriff, PE, Mark	Cosgrove, Donna	Cosgrove, Pamela	Cosmano, Theresa	Cossettini, Lisa	Costa, Lynn
Costa, Sandra	Costa, Sandra	COSTA, TYLER	Costabile, Elmer	Costanzo, Dennis	Costanzo, Lawrence
costanzo, Lorraine	Costanzo, Rev. Kathy	Coste, Robert	costello, anna	Costello-Kruzich, L	Costianes, Pauline
Costigan, Andrew	Costley, Maya	Costolo, Elaine	cote, william	Cotham, Keith	Cotler, Christine
Cotter, Ann	Cotter, Toni	Cotton, Connie	Cottrell, Alice	Cottrell, Sheila	Cottrill, Scott
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Coulson, Lynne	Coulson, Susan	Coulter, Andrea	Coulter, Harlee	Coulter, Patty	Coulter, William
Councilman, David	Counter Beaver, Holly	counter, Jackie	COUNTERMAN, JESSE	Counterman, Lauren	Countryman-Mills, Gayle
courson, robert	Courson, Ron	Courte, Christian	Courtier, Debbie	Courtin, Yvilde	courtney, al
Courtney, Donald	Courtney, Gail	Courtney, Gail	Courtney, Joely	Courts, Georgann	Cousino, Joyce
Cousins, Virginia	Coute, Katrina	Couturiaux, Julie	COVAN, ERIN	Covarrubias, Jacqueline	Covarrubias, Paloma
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Cox, John	Cox, John-Ambrose	cox, joy	Cox, Kristen	Cox, Lanie	Cox, Linda
Cox, Marian	Cox, Martha	Cox, Natalie	Cox, Patricia	Cox, Paul	Cox, Ronald
Cox, Veronica	Cox, Vita	Cox, William	Cox, William	Cox-low, Pilar	Coyle, Isabel
Coyne, Doris	Coyne, Kerri	Cozad, Bren	Cozzette, Sharon	Cozzi, Steven	Crabbe, Larry
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Craig, Robert	Craig, Ruth	Craig, sandy	Craigen, June	Crain, Amy	Craine, Shirley
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Crawford, Helen	Crawford, Jason	CRAWFORD, JIM	Crawford, Kim	crawford, licia	Crawford, Quinton
Crawford, Tim	Crawford, Tracy	crawford, william	Cray, Mary	Creech, Belinda	creech, charlotte
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Creighton, Nancy	Creitz, Virginia	Crenner, James	Crenshaw, Dave	Crespin, Bernadette	Cresseveur, Jessica
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Cross-McNier, Lissa	Crosthwait, p	Crotty, George	Crotty, Martha	Crotwell, KD	Crouch, David
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Crowley, Lawrence	Crowson, Sidney	crowther, amalia	Croxton, Jennifer	Crozier, Richard	Cruder, Robert
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Cruz, Graciela	Cruz, Kiana	Cruz, Lisa	cruz, maritza	cruz, monics	Cruz, Robert
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Cullen, Robert	Cullen, Sarah	Culligan, Mel	Cullimore, Rachel	Cullinan, SaraBeth	Cullum, Taylor
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Cunningham, Maeve	Cunningham, Mary	Cunningham, Paul	Cunningham, Saran	Cunningham, Storm	Cunningham, Tom
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Curington, Diana	Curlett, Lynn	Curley, June	Curley, Maureen	Curnow, Connie	Curow, Jerry

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Currie, Marianne	Currier, Bechi	Curry, Angie	Curry, Donna	Curry, Jill	Curry, Ladarius
Curry, Nathalie	Curry, Nicole	Curry, Stephen	Curtis, Alexandra	Curtis, Cathy	Curtis, James
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Curtis, Wendy	Curtiss, Francie	Curtiss, John	Curtiss, Kathy	Cushing, Nancy Jane	cusick, alenore
Cusmano, Emily	Custer, Julie	Cusumano, Sharon	cuthbertson, jacqueline	cuthbertson, Rodney	cutler, marcia
Cutler, Robin	Cutrofello, Liz	cutrona-buzzard, joelle	Cutter, Deborah	Cutting, Sherri	Cuttler, Elaine
Cuttler, Judy	Cutts, Bruce	Cutty, Donald	Cuyugan, Samantha	Cuzzocreo, J.	Cvengros, Benjamin
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Dadds, Anne	dado, Cheri	Dadpagouh, Eudora	Daemer, Ann	Daetz, Douglas	dafesh, kevin
Daga, Monserrat	Daggett, Kelly	D'Agostino, Natalie	Dague, Barbara	D'AGUIAR, STACY	Daharsh, Mark
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Dahlgren, Deborah	Dahlgren, PhD, Mr. Shelley	Dahlinger, Martha	Dahlstrom, David	Dahlstrom, Warren	Dahms, Bailey
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Dairiki, Janis	dakateau, lisa	Dal molin, toni	Dalalian, Matthew	Dalbeith, Janette	Dale, Barbara And Jim
Dale, Felicia	Dale, Leslie	Dale, Robert	dalegowski, patty	dales, Sandra	D'Alessandro, Keith
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Dalgliesh, Alison	Dalglish, J.D., Ph.D., Thomas K.	Dalition, Mitch	Dall, Frank	Dallaire, lise	Dallas, Robert
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Daloia, Lisa	Dalrymple, Deborah	Dalrymple, Kenneth	Dalterio, Michael J	Dalton, Brett	Dalton, Charles
Dalton, Danny	Dalton, Elizabeth	Dalton, Lee	Dalton, Marsha	Dalton, Suzanne	daly, aly
Daly, Ed	Daly, Jon	Daly, Kathleen	DALY, LINDA	Daly, Mary	Daly, Wendy
Dam, Russell	D'Amato, robert	dame, sarah	DAMERON, SUSAN	Damesek, Harriet	Damiano, Chris
Damminger, Leane	Damon, Rhea	D'Amore, Marie	Damron, Ellen	Damron, Patricia	Dana, Dianne
Dana, Krista	danard, nancy	dander, katherine	Dane, William	Danford, Jeannie	Danforth, Lou
Dangelo, joseph	Danie, Veronica	Daniel, Jana	daniel, jane	Daniel, Kian	Daniel, Kim
Daniel, Marie	Daniel, Robert	Daniel, Roger	Daniel, Sheila	Daniel, Sheryl	Daniel, Wayne
Danielczyk, Matthew	danielle, servas	daniello, george	daniello, john	Daniels, Carla	Daniels, Cathleen
Daniels, Chris	Daniels, Elizabeth	Daniels, Elizabeth	Daniels, Esther	Daniels, Julian	Daniels, Karil
Daniels, Kim	daniels, savannah	Daniels, Stacey	Daniels, Tim	Danielsen, Laura	Daniels-Lee, David
Danielson, Thad	Danielson, Toni	Danies, Tea	Dankner, Ellie	Danna, Charles	DAnna, Marie
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Danskin, Selma	D'Antin, Edward	Danver, Sue	Danz, Ken	Danzenbaker, Jim	Darby, Jim
Darby, Jordan	Darby, Sara	Darcy, Kevin	Dardarian, Jessica	Dardarian, Jessica	Dare, Cheryl
dargin, jessica	darienzo, zach	Darish, Susan	Darke, Jon	Darling, Nicole	Darlington, Kimble
Darmon, Sheri	Darne, Meliss	Daross, Beverly	Darr-Hall, Jamie	Darst, Caroline	Darst, Caroline
Darst, Dolores	Dart, Dr. Mary	Darter, Nyssa	Dartez, Carroll	darville, lynn	Dasca, Adrian
Dascotte, Melinda	Dasel, Tenzin	Dash, Andrea	Daspit, William	Date, Jennica	Date, Paula
Dater, Suzanne	Daubert, Beth	Dauerty, Barbara	Daugherty, Caity	Daugherty, Charles	Daugherty, Connie
daugherty, dinah	Daugherty, nina	Daughtry, Whitney	Daukopulos, iphigenia	Daunell, Judi	Davelis, Gina
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Davenport, Mara	Davenport, Patricia B.	Davenport, Robert L	Davenport, Susan	Davey, Cinthia	Davey, Jay
Davey, Marilyn	David, K	david, radden	Davidek-Waller, Carol	Davidoff, Janet	davidov, Alisa
Davidson fusco, Ryan	Davidson, Ann	Davidson, Cecilie	Davidson, Debora	Davidson, Elizabeth	Davidson, Karen
Davidson, Kristina	Davidson, Nicole	Davidson, Nora	Davidson, Pam	davidson, robert	Davidson, Sharon

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Davies, Helen	Davies, Jerry	Davies, Jill	DAVIES, MARILYN	davies, matt	Davies, Phyllis and Mr. Bill
Davies, Sharon	Davil, Maria	davila, danielle	Davila, Matthew	Davis, Allen	Davis, Amanda
Davis, Amber	Davis, Audrey	Davis, Barbara	Davis, Candy	DAVIS, CARLA	Davis, Carlton
DAVIS, CAROL TATTERSALL	Davis, Catherine	Davis, Catherine	Davis, Cathy	Davis, Cheryl	Davis, Chris
Davis, Clay	Davis, Clem	Davis, Cynthia	Davis, Cynthia	Davis, D	Davis, Daniel
Davis, Daryl	Davis, Davin	Davis, Deborah	Davis, Deni	Davis, Diana	Davis, Dilanya
Davis, Donna	Davis, Ella	Davis, Emily Jane	Davis, Emma	Davis, Gaare	Davis, Gayle
Davis, Genni	davis, Gerry	Davis, Heather	Davis, Helen	Davis, Helen	Davis, Helen
Davis, Jack	Davis, Jacob	Davis, Jacqueline	Davis, Jason	Davis, Jeff	davis, jeff
Davis, Jennifer	Davis, Jerry	Davis, Joan	Davis, John	Davis, Julia	Davis, Justin
Davis, Kat	Davis, katherine	Davis, Katherine	Davis, Kathleen	Davis, Kathleen	Davis, Kermit
davis, kim	Davis, Lauren	Davis, Laurie	Davis, Lee	davis, leslieh	Davis, Linda Jean
Davis, Liora	Davis, Liz	Davis, Lynda	Davis, Lynette	Davis, Magie	Davis, Maria I
Davis, Mark	Davis, Marla	Davis, Mary	Davis, Micahel	DAVIS, NATALENE	davis, nathan
Davis, Patricia	Davis, Patricia	Davis, Paul	Davis, Phillip	Davis, Richard	Davis, Rita
Davis, Ronald Joel	Davis, Ronald L.	Davis, Roscoe	Davis, S.	Davis, Sarah	davis, scott
Davis, Sharon	Davis, Sharon	Davis, sherry	Davis, Sherry	Davis, Stephanie	Davis, Susan
Davis, Terry	Davis, Tiffany	Davis, Timothy	Davis, Valerie	Davis, Valerie	Davis, Vera
Davis, Vicky	Davis, William	Davisj, Maria Theresa	Davison, Ann	Davison, Dashun	Davison, Heidi
Davison, Julie	Davison, Lois	Davison, Richenda	Davlantes, Nancy	Davy, Jessica	Davy, Judy
Daw, Brian	Daw, Karen	Dawe, Dorothy	dawkins, james	Dawley, Thomas	Dawn, Sara
Dawson, Adele	Dawson, Cindy	Dawson, Gayle	Dawson, James	Dawson, John	Dawson, M. Joan
Dawson, Patricia	Dawson, Susan	Dawson, Yvonne	Dawson-Barker, Joelle	Day, Barbara	Day, Brian
Day, Charlie	Day, Chrissy	Day, Edward	Day, Emily	Day, Jessie	Day, Joanne
Day, Kathy	Day, Linda	Day, Louise	Day, Maggie	Day, Rosanne	Day, stefanie
Day-Evers, Julianne	dayter, sarina	dayton, gary	dazzi, andrea`	de almeida, maria	de anda, sandra
De Arman, Joanna	de Carlo, Philip	De Carolis, Yvonne	De Cecco, Jorge	De Falco, Karen	De Felice, s
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de gregorio, lino	De Guise, Elizabeth	De Jasu, Barry	de jesus, elizabeth	De La Cruz, Edson	De La Cruz, Laura
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Dean, Jaoana	Dean, John	Dean, Julia	Dean, Kathy	dean, moira	Dean, Sandra
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Decaprio, Ethan	Decargouet, Yves	DeCarlo, Christine	decarr, carol	DECASTRO, BRENDA	Dechi, Ani
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Decker, John	Decker, Marie	Decker, Mary Gail	Decker, Ray	Deckert, Cecilia	Deckert, Julie
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Deem, J	Deem, Kaycie	Deemer, Toby	Deen, Daysha	Deen, Kara	Deere, Midge
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Delaney, Priscilla	Delaney, Sarah	Delap, Lucy	DeLawyer, Jeannelynn	Deleon, Alyssa	deleon, Bianca
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Delgado, Gayle	Delgado, Joe	Delgado, John F	Delgado, Jose	Delgado, Lorena	Delgado, Miyako
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DeLu, Dirk	DeLuca, Greg	DeLuca, Milva	deluca, milva	DeLuca, Patricia	DeLuca, Theresa
DeLuca, Theresa	DeLuca, Tobi	DeLucca, Robert	DeLuna, Marie Claire	DeLupa, Jeri	Delusso, Donna
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Demartino, Isabella	deMauro, Lisa	Dembeck, Jeanne	Demchuk, Amanda	Demelis, Faye	Demers, Deanna
Demers, Edward	demes, Helen	Demetri, Anna	Demetrio, Raul	Demetropoulos, Hillary	Demic, Robert
DeMillion, Frances	Deming, Laura	Deming, Linda	DeMirjian, Carolyn	Demmin, Emily	DeMola, Frank
DeMoor, Mary	Demore, Renita	demorest, raylene	Demos DeFranca, Marisa	DeMoss, Barbara	Demosthenes, Deneen
Demott, Margaret	DeMott, Theresa	Dempsey, Jo Beth	Dempsey, Kelleen	Dempsey, Kelleen	Dempsey, Lucy
Dempsey, Sheila	Dempsey, Tammy	Dempsey, Terry	DeMuro, Sarah	den dulk, connie	Denby, Melissa
Denby, Timothy	Dence, Debbie	Dendinger, Joanne	Deneve, Douglas & Pam	Dengler, Joanne	Denhaan, Luke
Denham, jeff	Denham, Jessica	denker, edie	denkins, sandra	denlinger, Shelia	Denman, Jack and Margar
Denman, Pam	Denmark, Cindy	Denmark, Gerald	Denne, Joyce	Denneen, Bill	Dennehy, LJ
dennenberg, dani	Denney, Chris	Denney, Jerrold	Denning, Asphodel	Denning, Drew	denning, kara
Denninger, Sandra	Dennis, Angela	Dennis, Cassandra	Dennis, Gudrun	Dennis, Jonathan	Dennis, Leah
Dennis, Ron	Dennis, Sarah	Dennis, Ted	Dennis, Yazzi	Dennison, Brett	Dennison, Carolyn
Dennison, Donna	Denniston, Ethan	Dennler, Cathy	Denny, Rachael	Denny, Robert	Deno, Christine
Denoo, Joan	Densmore, Chuck	Dent, Thomas	Denton, Patricia	D'Entremont, Regina	d'Entremont, Sylvia
dentz, rebecca	Denuccio, LK	DeNunzio, Bruce & Maureen	Deocera, Rod	DeOcera, Rod	Depauw, Hilde
Depetris, Martin	Deporter, David	Deppong, Genevieve	Depue, Douglas	Der, Don	Deragon, Josiane
DeRammelaere, Susan	Derbick-Johnson, Mary	Derbort, Wendy	Derden Little, Abby	derechos humanos, instituto de los	Derhammer, Randy
Derks, Linda	Derleth, Penny	Dermer, David	Dermody, Janet	Derner, Wendy	DeRocha, Sandra
Deroche, Russel	DeRogatis, Dana	DeRose, Marjorie	DeRose, Sonja	DeRousse, Craig	Derrah, William
Derrick`, jANE	Derringh, Helena	deru, flora	Derville, Emmanuel	Dervisevic, Nisa	Derzekou, Konstantina-Mar
desai, raj	DeSalvo, Vince	DeSanchez, Tammy	DeSanctis, Joseph	DeSantis, Amy	DeSantis, Dena
Desantis, Nancy	DeSantis, Richard	DeSarro, Gary	Desart, Marci	Desborough, Laurella	DeShaies, Cheryl
DeShane, Daniel	Deshotel, Shelley	Deshpande, Chitra	Desiderius, James	DeSilva, Tiffany	desimone, chip
Desjardins, Paul	Deslandes, Lillian	Desloover, Tanya	Desmarais, Adam	DesMarais, Lauri	Desmond, Sheila
Desmond, Sheila	DesOrmeaux, Brandon	DeSousa, Tracey	Desparois, annie-claude	Desrosiers, Elaine	Dessemontet, Ruth
DESTANQUE, VIRGINIE	DeStefano, Robert	Detaranto, Joe	Determan, Kristine	Deters, Gwen	Detlie, Cydney
Detrick, Carola	Detrick, Mary	Detter, Claudia	Dettinger, Thomas	Dettloff, Susan	Dettmann, Jim
Dettori, Antonio	Dettrey, Kim	deubel, paula marie	Deutermann, Katy	Deutsch, Michele	Deutsch, Steven

Deuvall, Roy	Devalier, Renee	Devault, Judy	Dever, Tim	Devereaux, Charmain	Devey, Jennifer
Devine, Christopher	Devine, Gillian	DeVine, Joanne	Devine, Judy	Devine, Linda	DeVine, Mandy
Devine, Patricia	DeVito Wilhite, Cheryl	Devlaeminck, Michelle	Devlin III, Cornelius	Devlin, Felicity	Devlin, Melissa
Devlin, Summer	DeVries, Cameron	DeVries, Nancy	DeWald, Carole	Dewart, Chris	DeWees, Kathryn
Dewey, Linda	Dewhirst, Emma Jo	Dewhurst, Myra	DeWitt, AE	DeWitt, Amy	Dewitt, Michaelle
Dews, Tony	Dexter, David	Dexter, Kathryn	Dexter, Russell	Deyo, Linsi	Deyo, Lisa
Dezee, Denise	d'herckers, Jennifer	Dhondup, Lobsang	Di Benedetto, Rainbow	Di certo, Janis	Di Fiore-Will, Anne
Di Leonardo, Gary	Diamante, Nina	Diamond, Ann	Diamond, Bob	diamond, caren	Diamond, Carl
Diamond, Emily	diamond, laurie	Diamond, Meredith	Diamond, Nichole	Dian, Jennifer	Diana, Debra
Diane, Jaclyn	Diaz, Brian	Diaz, DeNae	Diaz, Felipe	diaz, glenda	Diaz, Herman
diaz, Lorenzo	Diaz, Martha	diaz, mauricio	Diaz, Mayra	Diaz, Melissa	Diaz, Susan
Diaz, Tanya	Diaz, Tony	DiBenedetto, Richard	Dichtl, Mary	DiCillo, Ralph	dick, barbara
Dick, Linda	Dick, Marianne	Dick, Mittie	Dick, Paul	Dickens, Amy	Dickens, Marcay
dickenson, maureen	Dickerson, Mircellia	dickerson, susan	DICKIE, ALAN	Dickinson, Nancy	Dickinson-Adams, Emily
Dickler, Deni	dicks, rodger	dickson, denita	Dickson, Juleen	Dickson, Samuel	DiCristina, Rafael
Didier, Mary	Didino, Virginia	DiDomenico, dianne	DiDonato, Frank	Didrichsen, Olivia	Diederichs, Barbara
Diehl, Fanny	diemand, grace	Diener, B. Thomas	Dierig, John	Dierks, Dick	Diermier, Jessie
Diernbach, Diane	Diernbach, Diane	Diersch, Deborah	Dieterich-Hughes, Sandra	Dietrich, Janet	Dietrich, Kim
Dietrich, Robert	Dietterich, Lee	Diez, Alia	DiFonzo, Gabrielle	DiGangi, Dolores	DiGennaro, Catherine
Diggle, Gloria	DiGiacomo, Susan M.	DiGiallonardo, Gina	DiGiovanni Jr., Robert	DiGiovanni, Lydia	DiGiovanni, Marissa
DiGirolamo, Myriam	Digius, Carolyn	Diiorio, Amanda	DiLabio, G	Dilbeck, Kirk	Dill, Kimberly
Dillard, Gavin	Dillard, Gavin	Diller, Becky	Diller, Christine	Dilley, Pamela	Dillingham, Mark
Dillman, Deborah	Dillman, Terry	Dillon, GGmaSheila	Dillon, Jerry	Dillon, Pamela	Dillon, Patrick
Dillon, Sheila	Dilon, Shindi	Dilsaver, D	DiMaggio, Britta	DiMaio, L	DiMartino, Penelope
DiMauro, Joyce	Diment, Kim	Dimitrov, Carol	Dimmick, Jeanine	dimmick, shane	Dimmock, Susan
Dimock, Donald	DiMoia, Sue	Dimov-Gottshall, Emily	Dimter, Katie	Dinard, Marilyn	Dines, Anselm
Dinescu, Carmen	Dingerson, Marcie	Dingilian, Martha	Dingle, Janet	Dingle, Richard	Dingledy, Mary
Dingler, Judith	Dingman, Amy	DiNicola, Kelly	dinicola, marie	Dinkin, Garry	Dinsmore, Sharon
Dinucci, Pam	Dinunzi, Lenora	Dion, Patricia	Dionigi, Julie	Dionisio, Helena	Dionne, Denis
DiOrio, Sandra	Diot, Laurent	Dipaola, Marisa	DiPietro, Lisa	Direnzo, Jennifer	direnzo, michele
Dirks, Jason	Dirmeyer, Ginger	DiSalvo, Patricia	DISHAW / SHARP, GERALD / THOMAS	Dishy, Danielle	DiSimone, Angela
Dismukes, Karen	Diss, Marybeth	Distad, Leslie	DiStaso, Crystal	Distin, Carolyn	Distin, Katie
Ditchman, Michele	DiTomasso, Tina	Dittrich, Terry	divard, Élisabeth	Diwakar, Vanditta	Dix, Sally
Dixon, Angie	Dixon, Anita	dixon, Beth	Dixon, Brenda	Dixon, Brianna	Dixon, Holly
Dixon, Holly	Dixon, James	dixon, jennifer	Dixon, Jim	Dixon, Jim	Dixon, JoAnn
Dixon, Joyce	Dixon, Kelly	DIXON, NANCY	Dixon, Roberta	Dixon, Sophia R	Dixon, Theresa
Dixon, Vernon and Mary Joyce	Djombalic, Denny	Dlugonski, Melba	Dlugopolsky, Peter	Dmukauskas, Barbara	Doak, Phyllis
Doan, Matthew	Dobbins, Sharon	Dobeck, Irini	Dobeck, Irini	Dobek, Astrid	Dobosh, George
Dobrer, Janet	Dobreuenaski, Suzan	Dobric, Nikola	Dobrinski, Katie	Dobronyi, Kathy	Dobson, Ainsley
Dobson, Carol	Dobson, Patricia	Dobson, Richard	Dobyns, Cathy	Dobyns, Christi	Doctor, Denise
Doctor, Kathleen	Dodd, Belinda	Dodd, Kimberly	Dodge, Dusty	Dodge, Jeri	Dodge, John
Dodge, Laura	Dodson, Betty	Dodson, Dr Don C	Dodson, Taylor	doe, jane	Doe, Robert
Doebel, Norman	Doeden, Susan	DOERFLER, ILONA	Doerfler, Judy	Doering, Anne	Doerler, Jan
Doerr, Helena	Doetterl, Barbara	DOGANAY, NİLGUN	Dohaney, Mary	Doherty, Beth	Doherty, Gill
Doherty, Helen	Doherty, Jeanne	Doherty, Nia	Doherty, Rachel	Doiron, Sherri	Dolak, Roxanne
Dolan, Kathy	Dolgov, Igor	Dolifka, Rachel	Dolins, Francine	Dolins, Merelyn	Dollar, Ellen
Dolly, William.	Dolph, Ivar	Dolph, Sara	Dolud, Maksym	Domanski, Karen	dombek, amy
dombey pearl, sylvia	Dombrowski, Bonnie	Domike, Tammy	Dominguez, Delia	Dominguez, Joanne	Dominguez, Lindsay
Dominguez, Mari	Dominguez, Marisol	dominiak, keith	Dominici, Rebecca	Dominique, HENRY	Domke, Ellen
domon, sharon	dompka, Diane	Donaghue, Tabitha	Donahoe, Anna	Donahue, Audra	Donahue, Lee
Donahue, Linda	Donaldson, Julie	Donaldson, Peter	Donatella, Gia	Donavel, Mason	Doncova, Olga

Dondershine, Stephen	Donicht, Mark and Aurilene	Donini, Bernice	Donley, John	Donley, Tara	DONNARUMMA, SAL
Donnay, Marguerite	Donnell, Bruce	Donnellan, Kathleen	Donnellan, William	DONNELLY, KATHLEEN	donnelly, rose
Donnelly, Sarah	D'Onofrio, Adam	D'Onofrio, Sue	Donohoe, Andrea	Donovan, Cara	Donovan, Charlene
Donovan, Daniel	Donovan, Faye	Donovan, Heather	Donovan, John	Donovan, Patrick	Donovan, Patrick M.
Donovan, Sheila A.	Donovan, Stephan	Donovan, Terry	Donovan-Couture, Patricia	Donovan-Popa, Mary	Donzelli, Telma Apparecid
Doofe, Ronald	Doolen, Tina	Dooley, Ashley	Dooley, Deborah	Dooley, Jeff	Dooley, Jenny
Dooley, Joshua	Dooley, Robert	Dooley, Shannon	Doolittle, Deb	Doone, Michele	Dooney, Donna
Doran, Ford	Doran, Joseph	Doran, Kathy	Doran, Louisa	Doran, William	Dorchin, Susan
Dordoni, Tiziana	Dorer, Michael	Dorf, Barbara	Dorf, Vlad	Dorfman, Mary Virginia	Dorfman, Peter
Doria, Janine	Doris, Lily	Dorn, Carol	Dorn, Diane	Dornberg, Gwynne	Dornfeld, Robert
Dornheim, Edmund	Dorr, Janis	Dorraj, Pat	dorsey, alice	Dorsey, Brian	Dorsey, Debbie
dorsey, jeanette	dorsey, joan	dorsey, joe	Dorsey, Thomas	dos santos, jamie	Doss, Katherine
doss, Kenny	DosSantos, Julia	Dostal, Martine	Doten, James	Dothey, Chantal	Dotson, Jack
Dotson, Kathye	Dotson, Mike	Dotson, Robert	Doty, Carol	Doty, David	Doty, Jimmy
Doty, Margaret	Dotzauer, Uwe	doubek, vici	Doucet, Barbara	Doucet, Lisha	Doucette, Anna
Doucette, Wayne	Doucette-Sperry, Bernadette	Doud, Carol	Doud, Lori	Dougall, Janice	Dougher, Marilyn
Dougherty, Dennis	Dougherty, Kathleen	Dougherty, Laurie	Dougherty, Lyle	Dougherty, Nancy	Dougherty, Patience
Doughty, Alyiah	Douglas, Carol Anne	douglas, diane	Douglas, Dianne	Douglas, Dianne	Douglas, Dianne
Douglas, Kenneth	Douglas, Lisa	Douglas, Norman	douglas, shelly	Douglas, Tammy	Douglas, Wendy
Douglas, william	Douglass, Gregory	Douglass, Sharon	Douglass, Susan	Doukas, Andrea	Doulatshahi, Paulette
Doupi, Dimitra	Dove, Heather	Dow, Marie	Dow, Norma	Dowden, Ralph	Dowell, Chet
Dowell, Deborah	Dowell, Terry	Dowler, Robert	Dowling, Christopher	Dowling, Glenna	Down, Lisa
Downard, Wendy	Downer, Betty	Downes, Shawn	Downey, Judith	Downey, Meghan	Downie, Kathy
Downing, Jacquelyn R.	Downing, Koleyna	Downing, Nancy	Downing, Rosamund	downing, Sandy	Downs, Annychristina
Downs, Melissa	Downs, Tanya	Dowson, Eleanor	DOYLE, APRIL	Doyle, David	Doyle, Jo-Ann
Doyle, Kathleen	Doyle, Patricia	Doyle, Vivian	Dp age, De	Dr. Richard B. Marks, Michael C. Ford and	Drabin, Carol
Dragan, Sandra	Dragavon, Linda	dragif, ella	Dragoi, Gabriela	Drahorad, Lucy	Drake, Beth
Drake, Cynthia	Drake, Diane	drake, heather	Drake, Judith	Drake, Linda	Drake, Mercy
Drake, Skip	drake, tasha	Drake, Tracy	Drake, William	Drakeford, Phyllis	Drandell, Harry
Drane, Danalyn	drank, marianne	Draper, Amber	Draper, Anthony	Draper, Barry	draper, mynka
draper, philo	Draper, Stephen	Draper, Tanya	Dratch, Sam	Draudt, Gretchen	Draughon, Jo Ann
Dravis, Mia	Drayner, Yvette	drda, h	dregán, marianna	Dreher, Elizabeth	Drehmer, Marybeth
dreikosen, april	Dreiling, Janine	Dreller, Rebecca Lynn	Drenikowski, Eileen	drennan, carol	Drennan, Michael
Drenning, Ben	drescher, frances	Drescher, Sandra	Dresser, David	Dresser, marilyn	dresslar, joanne
Dressler, Judi	Drew, Susan	drew, tommy	Drewel, L	Drews, Donna	Dreyfuss, Simeon
Dries, Rebecca	Driftwood, Otis	Driggs, Deb	Driggs, Terry	Driscoll, Arthur	Driscoll, Breana
Driscoll, Daniel	Driscoll, Jordan	Driscoll, Marie	Driskell, Shelley	Driskill, Anna	drobny, mary
Droessler, Wayne	drosis, todd	Drouin, Dale	Droz, Beverly	D rrenberg, M.	druchala, linh
Drum, Karen	Drumm, Courtney	drummond, david	drummond, diane	Drummond, Luda	Drumright, Chris
Drumright, Chris	Drury, Bob	Drury, Shadoe	Drwinga, Helen	Dryer, Ellen	Dsouza, Deanna
d'Souza, Gladwyn	D'Souza, Juliet	D'Souza, Randolph	Du Preez, Sieglinda	du Rivage, Robert	Duarte, Adriana
Dubcak, Chris	Dubinsky, Jesse	DuBois, Cherie	Dubois, Eleanor	DuBois, Sara	Dubois, Sybille
duburg anchen, celine	Dubuy, Nath	duc, joel	duca, maria	Duchesne, Laurent	Duchon, Roseann
Duchov, Duncan	Duck, Mary	Duckson, Michael	Duckworth, Carole	Duckworth, Nadine	Ducoing, Edie
Duda, Tim	Dudeck, Kathryn	Dudeck, Nikki	Dudgeon, Dawn	Dudgeon, Destiny	Dudkowski, Amber
Dudley, Gregory	Dudley, Melissa	Dudley, Mike	Dudley, Nancy	Dudley, Sam	Dudley, Walter
Dudrick, Roseann	Dudzinski, James	Duefrene, Jerilyn	Duell, Robert	Duenas, Elen	Dueñas, Michael
Duenes, Nicole	Duett, Connie	Duey, Hugh	Dufau, Pat	Dufault, Kiran	Dufel, Laura
Duff, Jen	Duffy, Alice	Duffy, Cecilia	duffy, clare	Duffy, Diana	Duffy, Ellene
Dufour, Allyson	Dugan, Jim	Dugan, Judy	dugan, julia	Dugan, Kit	Dugan, Michelle
Dugan, Tonya	Dugar, Alice	Dugdale, Aimee	Duggan, Betty Ann	Duggan, Eric	Dugger, Leslie

duggin, goth	Duhamell, Arlene	Duhaney, Janet	Duke, Kelly	Duke, Quinton	Duker, Kim
Dukes, Aaron	Dukes, Margaret	Dukes, Mary	DULA, JACK	Dulas, Scott	Dulberg, Joan
Dulgarian, R	Dulong, Gretchen	Duman, Bernadette	Duman, Bonnie	Dumas, Cheryl	dumas, joan
Dumas, Susan	Dumet, Virginie	Dumke, Sandy	Dummel, Lisa	Dumont, Brenda	Dunaetz, Phyllis
Dunal, Cathie	Duncan, Barbara	Duncan, Bruce and Wendla	Duncan, Corinna	Duncan, Darrell	Duncan, Debbie
Duncan, Jill	Duncan, Joseph	Duncan, K.Sue	Duncan, Laurie	Duncan, Pat	Duncan, Renee
duncan, sue	Duncan, Sylvia	Dungjen, Michelle	Dunham, Janet	Dunham, Kathy	Dunham, Marilyn
dunkavich, eleanor	Dunkelman, Maxine	DUNKERTON P, MARTIN	Dunkley, Julianne	Dunlap, Amber	Dunlap, Amber
Dunlap, Denise	Dunlap, Dianne	Dunlap, Jim	Dunlap, Nancy	Dunlap, Naomi	Dunlap, Pam
Dunleavy, Mary	Dunlevy, Patrick	Dunn Lee, Judith	Dunn, Brian	Dunn, Charles	Dunn, Christy
DUNN, DAVID M.	Dunn, James	Dunn, Jennifer	Dunn, Kristi	Dunn, Kristi	Dunn, Leslene
Dunn, Michael	Dunn, Michael	Dunn, Michelle	Dunn, Michelle	Dunn, Ryan	Dunn, Sharon
Dunn, Timothy	Dunne, Rebecca	Dunne, Silvia	Dunning, Sonja	Dunson, Karen	dunst, beverly
Duong, Nic	DuPerry, Rebecca	Duplex, James	Duplissis, Eve	Dupont, Frances	dupont, jameka
Duppstadt, Eileen	Dupree, Judith	Dupret, Phyllis	Dupuis, Peggy	Dura, Michael	Duran, Jose A
Duran, K	duran, nori	Duran, Rose	durand, sraddha	Durando, Mary	Durant, Daniel
Durant, Reginald	DuRant, Taunya	Durante, Jeanne	Durbin, Jean	durbin, steve	Durden, Lynda
Durgampudi, Griselda	Durham, D.	Durham, DeWitt	Durham, James	Durham, Laura	Durham, Maggie
Durham, Stefan	Durkin, Samuel	Durling, Susan	Durnell, Susan	Durney, Alisa	Durrer, Mary
DURST, RITA	Dusseault, Renata	dust, michelle	Dusza, Elizabeth	duthie, Maureen	Dutra, Eve
Dutra, Russell	Dutschke, Stephen	Dutton, Hiroko	Duval, Patti	Duvall, Amalie	DuVall, Julie
duvall, melissa	DuVault, Shan	DuVerger, Roy	DV, Jeannie	Dvorak, Vojin	Dwyer, Hope
dwyer, jessi	Dwyer, Susan	Dwyer, Sylvia	Dwyer, William	Dy, Ravyne	Dyakon, Douglas
Dyar, Chandler	Dyas, Katherine	Dyche, Danny	Dyck, Barb	Dye, Fabienne	dye, paul
Dyer, David	Dyer, Jack	Dyer, Jane	Dyer, Liz	Dyer, Luwana	dyer, rev. louisa
dyer, shona	Dyer, Tim	Dygert, George	Dykema, C.	Dym, Harvey	Dymeck, Dennis
Dymeck, Terri	Dymond, Rosetta	Dysart, Tonya	Dyson Farrell, Christina	Dyszelski, A	Dziemidowicz, Marta
Dzikowski, David	Dzubak, Jane	E, Cheryl	E, Dawn	E, Dianne	E, Esteban
E, Holly	E, y	E, y	E., Juliet	Eadens, Ami	Eadler, Elaine
Eagen, Mary	Eagleston, Brenda	Eames, Cheryl	Eanes, Marilyn	Eanes, Sue	Eargle, Geoffrey
Earhart, Anne	Earl, Carla	Earl, Julia	Earle, Carolyn	Earles, Brent	Early, Bonnie
earnest, patty	Earnshaw, Donna	Earnshaw, Helen	EARNST, INGRID	Earp, Marsha	Easley, Debra
Easley, Philomena	Easley, Philomena	Easley, Terry	Eason, Brian	Eason, Marjorie	East, Arlene
East, Lawrence	Easter, Darrel	Easterling, Anne	Easterling, Nancy	Easterling, Phyllis	Easterly, Meredith
eastes, mary	Eastlake, David	Eastman, Daniel	eastman, mary	Eastman, Mary	Easton, Carol
Easton, Carol	Easton, Rick	Eastwood, Tony	Eaton Newell, Sandy	Eaton, Alexandra	Eaton, Carol
eaton, chris	Eaton, James	eaton, Kathleen	Eaton, Laura	Eaton, Nancy	eaton, paula
Eaves, Vicky	Ebel, Mary	Ebelini, Madeline	Eberhardt, Thomas	Eberz, Noelle	Ebinger, Robert
Eble, Anita	Ebner, Michael	Ebright, George	Ebright, Jeffrey	Echelmeyer, Frank	Echeverria, Lauren
Echoes, Dustin	Eckardt, Gerhard	Eckart, Emily	Eckberg, Brenda	Eckel, Carolyn	Eckersley, Cynthia
Eckert, Patti	Eckert, Stephanie	Eckhardt, Kerry	Eckler, John	Eckler, John	Eckler, John
Ecklund, John	eckstein, susan	Econom, Kim	Edain, Marianne	Eddie, Choral	Eddy, John
Eddy, Linda	Eddy-Hamilton, Marcia	Eddy-Lee, Gladys	Edelen, Walter	edell, elaine	Edelman, Ellen
Edelman, Eric	Edelman, Evelyn	Edelman, Richard	Edelson, Denise	Edelstein-Zhang, Barbara	Edenfield, Ashley
Edens, Teresa	Edgar, Linda	Edgar, Mary	Edgerton, Carol	Edgerton, Debbie	Edgerton, Muriel
Edgren, Mark	Edholm, Betsy	Eding, Megan	Edinger, Iris	Edkin, Donna	Edl, Richard
Edley, Pat	Edmiston, Gretchen	Edmonds, Teresa	Edmondson, Darlina	edmondson, jim	Edmondson, Nancy
Edmonston, Pandora	Edmunds, Sarah	edmunds, Susan	Edson, Patricia	Edstedt, Robert	Edwards, Amber & Scott
Edwards, Barbara	Edwards, Bruce	Edwards, David	Edwards, David	Edwards, Eric	Edwards, Jeri
Edwards, Lewis	Edwards, Mary	Edwards, Mary	Edwards, Maurice	Edwards, Monique	Edwards, Peri
Edwards, Rebecca	Edwards, Richard	Edwards, Robert	Edwards, Robin	Edwards, Willie	Eeckhout, Femke
Efron, Deborah	Efron, Deborah	Eftink, Lisa	egan, Bari	egan, cathy	Egan, June
Egan, Katharine	Egan, Kimberly	Egan, Marilyn	Egan, Maura	Egan, Susan	egan, susan

Egan, Yvonne	Egerton, Alison	Egge, Natasha	Eggers, Elke	Eggers, Lynne	egging, petra
Eggleston, Patrick	Egglezos, Mary	Egolf, Nancy	Eguiluz Jimenez, Maria	Eguren, Patricia	Ehlers, Lindsey
Ehnes, Tiffany	Ehren, Aviva	Ehrenkranz, Laura	Ehresmann, Barbara	Ehrlich, Cynthia	Ehrlich, Marion
Ehrnman, Sammy	ei, jen	Eichhorn, Marian	Eicholtz, Courtney	Eickelberg, Bonnie	Eide-Pippi, Barbara
Eidson, Brandon	Eiffler, Jeffrey	Eigner, Janet & Joseph	Eikenbary, Susan	eilers, frederick	eilers, pam
Eilers, Patricia or Patrice	Eilertsen, Sue	Einis, Ingeborg	Eiseman, Ruth	Eisemann, Cathy	Eisemann, Fran
Eisenbeis, Beth	Eisenberg, Michael	Eisenstein, Mara	Eiser, J	Eisler, Kevin	Eisler, Sherry
eisman, liz	eiswirth, craig	Eitel, Daphne	Eitelman, Andrea	Eixenberger, Roxannef	Ekdahl, Richard
Ekechukwu, Geoffrey	Ekhart, Lance	Ekholm, Terza	Eklund, Rolf	Ekman, Rev. John	el boubkari, latifa
El, David	El-Ahdab, W.	Elam, B	ELAM, TABATHA	Eland, Lynn	Elbaga, Aly
Elbert, Sierra	Eldard, Leslee	Elder, Elizabeth	Elder, Fonda	Elder, Melissa	Elder, Victoria
eldred, bethany	Eldred, Craig	Eldridge, Jane	Eldridge, Sara	elejabarrieta, alana	Elems, Greg
Elepano, Amy	Elferdink, Luann	Eliades, Mary	Elias, Joan	Elicerio, Audrey	elishaev, esther
Elizondo, Andrea	Elizondo, Rose	Elkins, Anne	Elkins, Elizabeth	Elkins, Karen	elkins, sara
Elleman, Susie	Ellen, Suzanne	Ellenwood, Laura	Eller, Gerald	Ellington, Robin	Ellingwood, Lynn
Ellingwood, Ronald	Elliot, Barb	Elliott, Allen	Elliott, Danielle	Elliott, Ed	Elliott, Emily
Elliott, Ian	Elliott, Jan	Elliott, Jan	Elliott, Kasey	Elliott, Margot	Elliott, Mary
Elliott, Pamela	Elliott, Paula	Elliott, Richard	Elliott, Ross	Elliott, Sherry	Elliott, Terry
Ellis, Aimee Dars	Ellis, Amy	Ellis, Charles	Ellis, Dale	Ellis, David	Ellis, Emory
Ellis, Graham	Ellis, Jane	Ellis, Joseph	Ellis, Laura	Ellis, melanie	Ellis, Monika
Ellis, Norm	Ellis, Paul	Ellis, Robin	Ellis, Sheila	Ellis, Susanne	ellison, bob
Ellison, Cori	Ellison, Darlene	Ellison, David	Ellison, Jane	Ellison, Tracy	Elman, Mark
Elmer, Tim	Elmo, Phyllis	Elmore, Angela	Elms, Donna	Elms, Luke	Elosua, R
Elowyn, Rebekah	Elrod, Preston	Elsayed, Christina	elsbach, bart	Elsbury, Jennifer	elsen, Brenda
Elston, Crystal	Elston, Denise	Elston, Marsha	elvi, mari	Elwell, Amy	Elwin, Breanna
Elwyn, Michelle	Ely, Liza	Em, Es	emanuel, rose	emanuelson, karie	Embers, Pat
Embertson, Randy	EMBREE, ANGELA C	Embrey, William	Embry, Judith	Embry, Obiora	Emeric, Yolanda
Emerson, Anne	Emerson, Anne	Emerson, Eunisha	Emerson, Maria	Emerson, Richard	Emery, Jamey
Emison, Sylvia	Emlinger, Wendy	Emmett, Briana	Emmke, Kathleen	Emmons, James	Emmons, Jamie
Emmons, Marian	Emory, Megan	Emory, Robert	Emory, Robert	emre, Ecem	Emry, Megan
Emshoff, Arthur	Emswiler, Noel	Enciso, natalie	Ender, Jill	Ender, Jill	Enderle, Andrea
Endes, Ernie	Endicott, Tina	endler, maria	Endress, Daphne	Enfield, Martie	Eng, Helen
Engel, Christine	Engel, David	engel, gesa	Engel, Jon	Engel, Linda	engel, selma
Engelbrecht, Linda	engelke, rich	Engelkemeir, Jean	engelmann, lanae	Engels, Linda	Enger, Erin
Engert, Kathy	England, Doreen	England, Joan	England, Kathleen	England, Roland	Engle, I.
Engle, Richard	Engleman, Lauren	Engleman, Sherry	Engler, Jacalyn	englert, daniel	Englert, Philip
English, Anne	English, Rodney	English, Shirley	English, Terri	English, William	Englund, Klaudia
Engram Francis, cheryl	Engstrom, Mary	Engvall, Brady	Enkemann, Christina	Ennis, Ciara	Ennouri, Elena
Enright, Marlene	Enriquez Struck, Bruno	ensch, paul	Ensign, Dianne	Enter your last name, Enter your first name	Enterline, Hope
Entwhistle, Dianne	Enz, Pamela	Enzi, Hap	epler-kurtz, martha	Epp, Hollie	Eppelheimer, Frank
Eppley, Sally	Epstein, Hedy	Epstein, Judy	Epstein, Nick	Epstein, Patty	Erath, Lyra
erb, cheryl	Erb, Frances	Erbeck, Janessa	Erceg, George	Erckmann, Jim	Erdie, Irene
Erdman, Mary	Erdmann, Donette	Erdmann, Linda	Erdmann, Sherry	Erica, Norris	Erice, Nilo
Ericks, Dee Renee	ERICKSON, CAROLE	Erickson, Charles	Erickson, Cheryl	Erickson, Deborah	Erickson, Joan
Erickson, Julie	erickson, laura	Erickson, Mary	erickson, micheal	Erickson, Nancy	Erickson, Norma
Erickson, Rob	Erickson, Rob	Erickson, Ron	Erickson, Shannon	Erickson, Sheryl	Erickson, Stacy
Erickson, Victoria	Erickson, Walter	ericson, del	Erikson, Anne	Eriksson, Maggie	erkkila, andrew
Ermlich, Gwendolyn	Ernemann, Michel	Ernest, Lacey	Ernst, Jeannette	Ernst, Kathleen	Erpel, Julia
Erquinigo, Zoraida	Errichetti, Dara	Errig, Kathleen	Errington, laurie	Erskine, Adam	Erue, Ifeanyi
ervans, michelle	Ervin, Kay	Ervin, Peggy	Erwin, Jeffrey	Erwin, Phyllis	Esaine, Suzanne
escandon, alfredo	Escarate, Adrian	Esco, Sylvia	Escobar, Connie	Escobar, Sandra	Escobedo, Alejandra
Escotal, Sandra	Esden-Tempski, Danika	eshelman, Karen	Eshelman, Kim	Eskelson, Diane	Eskew, Eve
eskridge, jackie	Esler, Izzy	Espana, Annie	Esparza, Jo	Espeland, Shirley	Esper, Diane

Esperas, Randall	Espersen, Susan	Espinola, Debbie	Espinosa, Gale	Espinosa, Ines	Espinosa, Jenni
Espinosa, Nelson	Espinosa, Teresa	espinoza, debra	Espinoza, noel	Esposito, Amanda	Esposito, Dan
Esposito, Maria	Esposito, Marta	Esposito, Susan	ESPUGA, RICHARD	esque, sandy	Essary, Steven
Essenmacher, Barbara	Esser, Char	Essex, Marianna	Essig, Grae	Essig, Susan	Essington, Stefanni
Essman, John	Estacion, Carlene	Estel, Karen	Estel, Karen	Esterhay, Judy	Esterly, April
Estes, E.H.	Estes, joan	Estes, Miriam	Esteve, Gregory	esteve, isabel	Esteves Wild, Suzy
Esteves, Elizabeth	estevez, ada	Estrada, Hank	ESTRADA, SANDRA	Estrada, Venus	estrella, analuce
Estrella, Daniel	Eswards, Terrt	Etheridge, Ruth	Etherington, David	Etherton, Michelle	Etherton, S.
Eubank, Angela	Eubanks, Elizabeth	Eubanks, Shari	Eudy, Elaine	Eugeni, Adrienne	Euken, Alec
Eukitis, Joan	eulo, elena	Eunice, Elissa	Euripides, Vincenza	Eurs, Albert	Eustice, Donna
Eva, S	evan, v	Evangelista, Nick	Evans, Brad	Evans, Bronwen	Evans, Bronwen
Evans, Catherine	Evans, Christopher	Evans, Colleen	Evans, Craig	Evans, Elinore	Evans, Evelyn
Evans, Faith	Evans, Gary	EVANS, GRANT	Evans, Janice	Evans, Jeffrey and Susan	Evans, Kay
Evans, Keisha	Evans, Kimberly	Evans, Kitty	Evans, Laura	Evans, Lynda	Evans, Michael
Evans, Michael W	EVANS, MICHELLE	Evans, Mike	Evans, Pam	Evans, Richard	Evans, Rose Marie
Evans, Shereida	Evans, Sheryl	Evans, Susan	Evans-Carmichael, Sherry	Evans-Ford, Sharon	Evanston, Luci
Eve Irvine, Eve Irvine	Eve, Tracy	Eveland, Nicole	Evely, Pam	Everett, Erica	Everett, John
Everett, Mike	everett, nicole	Everette, Walker	Everitt, Jamie	everitt, tracy	Evers, Joanne
Evers, Robin	Eversole, Dianna	Eversole, shawn	Everson, Yolanda	Evilsizer, Susan	Evinger, Linda
Evitt, Kinney	Evon, Debra	Ewan, John	Ewart, Anne	Ewart, Douglas	Ewen, Phyllis
Ewing, Mary Sue	Ewing, Peter	Ewing, Roger	EWING, SUSAN	Ewing, Tory	Ewins, Elizabeth
Ewoldsen, Brooke	Ewton, Sharon	Exley, Elizabeth	Eyer, Lynn	Eyster, Veronica	Ezell, Amanda
F, A	f, Jennifer	F, S	F, Wendy	f., Andrea	Faber, Megan
Faber, phyllis	Faber, William E.	Fabian, Dagmar	fabiani, Daniela	Fabiano, Donnaf	Fabiano, Gerard
Fabie, Sister Marise	Fabrocini, Yvonne	Facchetti, Elena	Facchini, Luca	Facchini, Valencia	Facenda, karen
Facknitz, Jarod	Fackrell, Marsha	Factor, TR	Fadden, Heather	Faddis, Ginger	fadze, anni
Faeo, Victoria	Faes, Stephen	Fagan, Melissa	Faggen, Candace	Fagundes, Bruno	Fahey, Colin
Fahey, Diane	Fahey, Maria	Fahey, Susan	Fahlbusch, Kay	Fahlstrom, Marylee	Fahmy, Natalie
Fahrenwald, Gill	Fahrner, Laurie	Faile, Kay	Faiman, Arlene	Fair, Jeanine	fairchild, a
Fairchild, Jamie	Fairchild, Jennifer	Fairchild, Veronica	Fairchild-Ehm, Audrey	Faircloth, Diane	Faircloth, Diane
Fairhurst, Roxanne	fairless, caroline	Fairless, Judy	Fairley, Peter	Fairman, Marcia	Fairweather, Douglas
Faison, Sandy	Faith, Parker	Faithfull, Lucia	Faith-Smith, Bonnie	Fajardo, Juan	Fajiram, Leonard
Falanga, Laura	Falasca, Dawn	Falco, Judy	Falcon, Rebecca	Falcon, Ruth Neuwald	Falcone, Janet
Falconer, Jay	Falealili, Samantha	Faletti, Lynn	Falk, Darlene	Falk, Sarbaga	Falkenberg, Daniela
Fall, Fred	Fallandy, Yvette	Fallaw, Jenna	Fallenstein, Andrea	Fallis, Eva	fallis, jane
Fallon, Elizabeth	Fallon, Roxana	Falls, Richard	Falvey, Tom	Falvo, Vincent	Falzon, John
falzon, natacha	Falzone, Dominick	Famariss, Lyndsay	Family, Susang-Talamo	Fandel, Amber	Fane, Gaby
Fanelli, Lynn	Fanelli, Mary	Fanestil, Abigail	Fangman, Leslie	FANN, barbara	Fantasia, Sally
Fante, Linda	fanucci, adam	Farabaugh, Clare	Faraldo, Adriana	Farber, Ron	Farely, Elle
Farey, John	Farhan, Yasmine	faria, faria	Farias, Adriana	Fariell, Debra	Farina, Robert
Farish-Hunt, Holly	Farkas, Elizabeth	Farkas, Suzanne	Farley, Chanda	Farley, Gloria	Farley, Patti
Farley, Sue	Farlow, J	Farmer, Bonnie	FARMER, SARAH	Farmer, Sheila	Farmer, Stephen
Farneth, Sally	Farone, Joe	Farr, Daniel	Farr, Jessica	Farrar, Amy	Farrar, Christina
farrar, lynne	Farrell, Adam	Farrell, Francis	Farrell, Mike	Farrell, Wendy	farrington, dotti
Farrington, Eunice	Farrington, Rachael	Farrington, Raymond	Farris, Cathy	Farris, Jean	Farro, Susan
Farschon, Robyn	farstead, Patrick	Fary, Jim	Faryman, Margie	Fasanella, Camille	Fasano, Jean
Fasciato, Catherine	Faser, Lisa	Fasick, Marilynn	Fassler, Kathryn	Fast, Yvonne	Faste, Linda
Fastuca, Joy	Fastuca, Meagan	Fataraoh, Rekhaef	Fatchett, Nikki	Faucett, Carol	Faulhaber, Carol
Faulk, Christina	Faulkner, Anita	Faulkner, Carol	Faulkner, Charles	Faulkner, Karla	Faulkner, Thelma
Faust, David	Faust, Gia	Faustino, Stephanie	Fauth, Fauna-June	favia, evakay	Favor, Erika
Favreau, Patrice	Favret, Karen	Fawley, Alan	Fawson, Rebecca	Fay, K Morgan	Fay-Muzar, Nancy
Feagin, Norma	Fearing, Phoebe	Fearn, Robert	Feaster, Cheri	feder, felicia	Feder, Melanie
federico, kellie	Fedor, Donald	Fedorov, Alexander	Fedorov, Kristina	Fedorsky, Tsar	Fedotova, Evgeniya

Fee, Catherine	Fee, Laurel	Feehan, Christopher	Feeley, Laura	Feeney, Thomas	Fehr, Angelique
Fehr, Stephen	Fehrmann, Gail	Fehrs, Willliam	Feichtinger, Dennis	Feichtinger, Dennis	FEICHTL, JAMES
Feig, Andrea	Feiger, Jennifer	Feild, Georgia	Fein, Susan	Feinberg, Lois	Feinman, Lori
FEINSTEIN, ADAM	Feiring, Janet	Feirtag, Donna	Feitler, Mary Anna	Feitler, Zanna	Feiven-Alleston, S
Felderman, Barb	Feldman, Barry	Feldman, Mark	feldman, maurica	Feldman, Tom	Feldmann, Heike
Felekoglu, Emek	Felgar, Ronald	Felicetta, Gina	FELICISSIMO, SUSAN	Felix, Andrea	Felix, Penny
Felix, Renea	Fellenz, Jan	Feller, Jean	fellion, karyn	Fellion, Rebecca	Fellman, Sheryl
Fellows, Leslie	Fellows, Sue	fellows, vicki	Felmet, Michael	Felnagle, Deborah	Felsen, Dawn
Felton, Carol	Felton, Jean	Felts, Carl	Felts, Elaine	Felts, Hannah	Felts, Karen
Felver, Rachel	femat, jonathan	Fencl, Edward	Fenn, Brad	Fenn, Susan	Fenster, Steven
Fenstermacher, Lauren	Fenter, Evelyn	Fentiman, Wendy	Fenwick, Andrea	Fenwick, Greg	Fenza, Karen
Feokhari, Anton	Feokhari, Anton	Feokhari, Anton	Fera, Kristen	Ferdinand, Marilyn	Ferendo, Cheryl
Fergeson, Cheryl	Fergison, Thel	Ferguson, Ana	ferguson, andrea	FERGUSON, Brian	Ferguson, Charlene
Ferguson, Erin	Ferguson, Florence	Ferguson, Kelly	Ferguson, Lisa	Ferguson, Lora	FERGUSON, LOREN S
Ferguson, Margie	Ferguson, Mary	Ferguson, Megan	Ferguson, Sarah	Ferguson, Sheryl	Ferland, Linda
Ferman, Pam	Fern, Cynthia	Fern, Yuli	Fernande, Fournier	Fernandes, Ana Paula	FERNANDES, isabelle
Fernandez, Billie	Fernandez, Christina	Fernandez, Don	FERNANDEZ, KOOKY	Fernandez, Maria	fernandez, ynez
Fernando, Chris	Ferner, John	Fernung, Michelle	Ferraguti, Fran	Ferrando, Elizabeth	Ferrando, Nancy
Ferrans, Jon	Ferrante, John	Ferrara, Kathleen	Ferrari, Andrea	Ferrari, Angela	Ferrari, Brittany
Ferrari, Denise	Ferrari, John	Ferrari, Walter	ferraro, diane	Ferraro, Frank	Ferraro, Kevin
Ferreira, Dawn	Ferrell, Judith	Ferrer, Natalie	Ferrer, Nuria	Ferrer-San Miguel, Franco	Ferretti, Chris
Ferri, Sandra	Ferrigno, Carl	Ferrigno, Mary	ferris, anne	Ferris, Jill	Ferro, Andre
Ferro, Dawn	Ferro, Sheri	Ferry, Stephen	Ferry, Tina	Ferson, Jane	Fertig, Gerard
Fery, Annalee	Fessenden, Lynne	Fetter, Sharon	Fetterman, Kevin	Fetterolf, Anna	Fetters, John
Fetz, Margot	Fetzer, David	Feuer, Jed	Few, Tamara	Fexis, Deborah	fey, mary
Fiederer, Conrad	Fiedler, David	Fiedler, Ed	Fiedor, Jillian	Fiegel, Esther	Field, Brian
Field, Kimberly	Field, Leslie	Fielder, Aixa	fielder, leonard	Fielder, Linda	Fielding, Rachael
Fields, Barbara	Fields, Carol	Fields, Dylan	Fields, Lisa	fields, Tamia	fierro, crystal
Fierro, Heather	Fierro, Marco	figtree, Craig	Figueiredo, Susana	Figueroa, Carolina	Figueroa, Daphne
Figueroa, Miguel	Figurski, Karen	Fike, Branden	Filardo, Emily	Fileccia, Yvonne	Files, Edward Joe
Filip, Thomas	Filipek, Jim	Filipelli, Ph.D., Deborah	Filkins, Candice	Fillmore, Heather	Fillmore, Jamie
Filter, Douglas	Finamore, Scott	Finazzo, Katie	Finberg, Patricia	Finch, Glenn	Finch, John
Finch, Matthew	Finch, Sasha	Finch, Scott	Finch, Sharon	Findlater, Amanda	Findlay, Kimberly
Fine, Cindy	Fine, Donna	Fineran, Mary	finet, christine	Finfrock, Judith	Fingerhut, Barry
Fingerhut, Max	Fingerman, Robert	Fink, Brian	Fink, Patti	fink, robin	FINK, WILLIAM MAX
Finkelstein, C. Robert	Finkelstein, Stephanie	Finklea, Mindy	Finley, Jeanne	FINLEY, KATHLEEN	Finley, Maleah
Finn, Mary	Finn, Steven	Finnegan, Pamela	Finnegan, Shawneen	Finnell, Adria	Finnell, April
Fioramonte, Giovanni	Fioravanti, Marilyn	Fiore, Mark J.	Firebaugh, Bunny	Firestone-Scott, Kathy	Firetto--Toomey, Chloe
first, mary beth	Fisch, Sara	Fische, Joei	fischer, asia	Fischer, Audrey	fischer, carl
Fischer, Carolyn	Fischer, Cheryl	Fischer, Cheryl	Fischer, Gabrielle	Fischer, Judy	Fischer, Louis
Fischer, Paige	Fischer, Peter	fischer, Phil	Fischer, Stanley	Fischer, Wendy/Dan	Fischetti, Michael
Fischmann, Steve	Fischoff, Robert	Fish, Charlotta	Fish, Cindy	Fish, John	Fish, Mal
Fish, Margaret	Fish, Richard	Fishbein, Michael	Fisher Neal, Yvonne	Fisher, Andrew	Fisher, Ann M
Fisher, Anne	fisher, anya	fisher, carla	fisher, carole	Fisher, Catherine	Fisher, Charles
Fisher, David	Fisher, Diana	Fisher, Gerald	fisher, jackie	Fisher, Julie	Fisher, Kay
Fisher, Kenneth	Fisher, Laurie	Fisher, Marcus	Fisher, Margaret	Fisher, Myrna	Fisher, Nathan
Fisher, Paul	Fisher, Pete	Fisher, Rand	Fisher, Renee	Fisher, Sarah	Fisher, Sarah Beth
Fisher, Sloan	Fisher, Susan	fisher, Tia	Fishgold, James	Fishman, Leslie	Fishman, Ted
Fisk, David	Fisk, Katrina	Fisk, Todd	Fisk, William	Fiske, Constance	Fisler, Linda
Fissel, Peter	Fister, Lee	Fister, Lee	fitch, Kaitlin	Fitch, Robert	Fitch, Sarah
Fite, Austin	Fite, Barbara	Fitter, Sandi	Fittipaldi, Silvio	Fitz, Fran	Fitz, Sharon
fitzgerald, allie	Fitzgerald, Bridget	Fitzgerald, Gwen	Fitzgerald, John	Fitzgerald, M.D., Shari	Fitzgerald, Michael

Fitzgerald, Michelle	fitzgerald, sheryl	Fitzgerald, Susan	Fitzgerald, Suzanah	Fitzgerald, Trey	Fitzgerald-Hodkiewicz, Caitlin
Fitzke, Marion	Fitzpatrick, Christopher	Fitzpatrick, Diane	FitzPatrick, Jamie	Fitzpatrick, John	Fitzpatrick, Sherry
Fiumara, Regina	Flachier, Roberto	Flacks, Erwin	Flade, Donna	Flader, Annie	Fladger, Robert
Flahart, Pat	Flaherty, Ruth	Flaker, Lorraine	Flanagan, Carol	Flanagan, John	Flanagan, Lynn
Flanagan, Marianne	Flanz, Anne	Flashman, Irwin	Flath, BoB	Flatten, Jennifer	Fleener, Teresa
Fleetwood, Patricia	Flegel, Rick	Fleischman, Penny	fleischmann, kayla	Fleishman, Barbara	Fleishman, Ellen
Fleitman, Jane	Fleming, Ashley	Fleming, Deborah	Fleming, Denille	Fleming, Donaldeen	Fleming, Krista
Fleming, Laura	Fleming, mary	Fleming, Melissa	Fleming, Nancy	Fleming, Nancy	Fleming, Peter
fleming, tonya	Fleming, Tracey	flemisch, sandra	Flenner, Bob	Fletcher, Alice	Fletcher, Barbara
Fletcher, Bonnie	Fletcher, Charles	Fletcher, Glenda	Fletcher, Jeanne	Fletcher, Judith	Fletcher, Monica
Fletcher, Nancy	Fletcher, Patricia	Fletcher, Rick	Fletcher, Tamara	Flicek, Amy	flick, justice
Flick, Wayne	Flickinger, Katherine	Fliegel, Doreena	Flink, Jerry	Flinn, John	Flint, Jennifer
Flis, James	floberg, sheri	flock, katrena	Floeck, Michael	Floersch, Pat	Floied, Frankie
Florance, Heidi	Florane, Laila	florczak, karen	florence, israel	Florencio, Camila	Florentine, Paula
Florenzen, Cynthia	Flores, Alexa	Flores, Anthony	flores, jesse	Flores, Larissa	Flores, Melissa
Flores, Melissa	Flores, Nick	Flores, Regina	Flores, Reinaldo	Flores, Rosa	flores, verny
florez balsera, antonio	Florian, Heather	florian, miriam	Florido, Carlos	Florio, Dawn	Florio, John
Florken, George	Flory, coleen	Flower, Gregory	Flowers, Herschel	Flowers, Zachary	Floyd, Cathrine Aasen
FLOYD, Charles	Floyd, Debra	floyd, gail	Floyd, Harold	Floyd, Kevin	Floyd, Kim F
Fluet, Christine	Fly, Carol	Flying Hawk, Sheri	Flynn SSND, Mary Frances	Flynn, Bridget	Flynn, Kim
Flynn, Samantha	Flynn, Vicki	Fobes, Deborah	Fogarty, Geraldine	Fogel, Jen	Fogelson, Christopher
Fogg, Lindsey	Foglietta, C	Folch, Joan	Folden, Marilyn	Foley Jr, Robert	Foley, Eileen
Foley, Irene	Foley, James	Foley, Kim	Foley, Lauren	Foley, Linda	foley, mary
Foley, Michael	Foley, Patricia	Foley, Stephan	Folger, Janet Denton	Folger, Jessica	Folino Gallo, Joseph
Folk, Donette	Folker, Joseph	Follett, Thelma	folley, julie	Followill, Peter	Folmer, A
Folmer, Alexandra	Foltz, Pat	Fonatanella, Lynn	Fonferko, Eileen	Fonken, Miryam	Fonseca, Josefa
Fontagneres, Stephen	Fontaine, Anna Louise E.	Fontaine, Michelle	Fontanarosa, Lisa	Fontecchio, Christa	Fontenelle, Eleanore
Fontenot, MaryJo	Foolery, Tom	Footman, Agnes	for, mar	Foran, Judith	Foran, Rochelle
Forbes, Doreen	Forbes, Ella	Forbes, J. D.	Forbes, Jennifer	Forbes, Roberta	Forbes, Stephanie
Forbes, William	Ford IHM, Mary Ann	Ford, Amber	Ford, Angie	Ford, Ann	ford, annalisa
ford, caren	Ford, Carol	Ford, David	Ford, Deborah	ford, diana	Ford, Eva
Ford, J.C.	Ford, Jane	Ford, Joe	Ford, Julie	Ford, Katherine	Ford, Leeann
ford, leonard	Ford, Marlene	Ford, Matthew	Ford, Michael	Ford, Rachel	Ford, Rebecca
Ford, Robert	ford, ronda	Ford, Shirley	Ford, Steve	Fordis, Jean	fordyce, diane
Foreman, Abigael	Foreman, Dowe	Foreman, Jacob	Foreman, James	Forero, Eduardo	Forero, James
Forero-Pena, Alcira	Forest, Agatha	Forgacs, Nora	Forgan, Jacky	Forkish, Jo	Forkos, Joy
Forman, Andrea	Forman, Fay	Forman, Harriet	forman, Janet	Forman, Jennifer	forman, mitch
Forman, Ritalynn	Forman, Sandra	Formica, Emily	Fornagiel, Valeri	Fornari, Arthur	Fornari, Paula
Fornasari, Jacopo	Forner Laplante, Alice	Forrest, Becca	forrest, dot	Forrest, Karla	Forrest, Larry
Forrest, Phillip	Forrest, Vicky	Forrester, Elizabeth	forrister, carol	Forschner, Jillian	forson, amy
Forster, Wendy	Forsyth, Leslee	Forsythe, Kathy	Fort, Kimberly	Forte, Lorraine	Fortgang, Mindye
Fortier, Duane	Fortin, Jennifer	fortin, Lori	Fortini, Jan	Fortney, Robin	Forton, Joan
Fortune, Kathleen	Forwand, Arlene	Forward, Kent	Forwood, Michael	Foscherari, Dolores	Foshee, Linda
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Foster, Brenda	Foster, Chelsie	Foster, Cheyenne	Foster, Claudia	Foster, Cynthia	Foster, D
Foster, Dawn	Foster, Dorothy	foster, Eddie	Foster, Genette	Foster, Ginger	foster, holly
Foster, James	Foster, Jamilah	Foster, Judith	Foster, Lee	Foster, Mary	Foster, Merle
Foster, Nancy	Foster, Paul	Foster, Sarah	Foster, Sheilo	Foster, Sherri	Foster, Stephen
Foster, Steve	Foster, Suzanne	Foster, Sylvia	Foster, Tracy	Foster, Will	Foti, Bernadette
Foti, Jane	Fouche, David	Fought, Jennifer	Fouke, Daniel	Foulk, Docia	fountain, ashleigh
Fountain, Nicole	Fountaine, Kat	Foures, Prisca	Fournier, Carla	Fournier, Vickie	Fouse, Pamela

Foutts, Carol	Fowle, Margaret	Fowler, Barbara	Fowler, Beverly	Fowler, Cindy	Fowler, Connie
Fowler, Deirdre	Fowler, Elizabeth	Fowler, Erin	Fowler, Gyla	Fowler, Idell	Fowler, Londa
Fowler, Luci	Fowler, Nancy	Fowler, Rachel	Fowler, Richard	Fowler, Tammy	fowler, wilma
fox JR, daniel	Fox, Ashley	Fox, Camille	fox, carole	Fox, Cinnamon	Fox, Dana
Fox, Dennis	Fox, Dianne	Fox, Eleanor	Fox, Ellen	Fox, George	Fox, Gil
Fox, Heather	Fox, Kathy	Fox, Kayla	Fox, Kim	Fox, Lois	Fox, Marilyn
Fox, Nancy	Fox, Pamela	Fox, R	FOX, ROBERT	Fox, Sara	Fox, Stephanie C.
Fox, Sue	fox, susan be	fox, zita	Foxwell, Phylle	Foxworth, Linda	Foy, Ellen
Foy, Michelle	Fraaaser, JoAnn	Frach, Charles	Fracyon, Mansour	Fradkin, Sonia	Frahm, Nancy
Fraker, Laurie	Fraley, Kandyce	Frame, Donald	Framilla, Stephenie	Franchi, Irena	Franchs, Barbara
Francis, Abby	Francis, Clare	Francis, Kathleen	francis, kirk	Francis, Lorri	Francis, Sharlene
Franck, Matthew	Franco, Dana	Franco, Jesse	Francoeur, Roger	François, Monica	Francovich, Lynne
Frandson, Karla	Franey, Nell	franget, monica	Frangos, Kate	Frangos, Stephanie	Frank, Andrea
Frank, Bonnie	Frank, Brooks	Frank, Cheryl	Frank, Dave	Frank, Gary	Frank, Harriette
Frank, Lilyan	Frank, Norman	Frank, Tracy	Franke, Cynthia	Franke, Mary A.	Frankel, Alison Dayne
Frankel, Janice	Frankel, Mark	Frankenfield, Emma	Franklin, Bobbie	Franklin, Chris	Franklin, Constance
Franklin, Courtney	Franklin, James	Franklin, Marc	Franklin, Mary	Franklin, Michael	Franklin, Rosemary
Franks, Diane	Fransioli, Lena	Frantz, Gail	Frantz, Jeff	franz, carl	Franz, Ken
Franz, Mary	Franz, Sandra	FRANZ, sonja	franze, lucas	Franzen, Timothy	Franzi, James
Franzmann, Paul	Fraser, Evelyn	Fraser, Jill	Fraser, Meredith	Fraser, Susan	Fraser, Suzy
Frasinelli, Lauren	Frassoldati, Silvia	frasson, susan	Frati, Matthew	Fraundorf, Jane	Fray, Antje
Frayer, William	Fraytet, Jules	Frazee, Cary	Frazee, Janis	Frazee, JIM	Frazer, scott
Frazer, Shirley	Frazier, Darnell	Frazier, Maggie	frazier, shelley	Fread, Gail	Freas, Manette
Freddi, Alessandro	Frederick, Anne	Frederick, Heather	Frederick, Kathy	Frederick, Marvin	frederick, racheal
Fredericks, Adria	Frederiksen, Linda	Fredrich, Vikki	Fredrickson, Jenne	Fredrickson, John	Fredrickson, Robert
Free, Kathie	Freeberg, Jim	Freed, Anna	Freed, Makayla	Freedman, Karen	Freedman, Matt
Freedom, Rea	Free-Gould, Alycia	Freeland, Adele	Freeland, Bridget	Freeland, Frederick	Freels, Jeff
Freeman, Alyssa	Freeman, Amy	Freeman, Catherine	Freeman, Clare S	Freeman, Dave	Freeman, Edward
Freeman, Emily	Freeman, Emily	Freeman, Gabriele	freeman, joseph	Freeman, Kevin	Freeman, Kyri
Freeman, Lawson	freeman, madeline	Freeman, Michael	Freeman, Pat	Freeman, Richard	Freeman, Sharon
Freeman, William	Freese, Judith	freeze, cheryl	freeze, cheryl	Frega, Doreen	fregin, N
Frei, Constanze	Frei, Marina	Freiband, Linda	Freiday, Tim	Freidberg, Stan	Freimark, Laurie
Freire, Sophia	FREITAG, LINDA	Freitag, Melanie	Freitas, Frank	Freitas, Maureen	Freman, Gregory
Fremont, Ann	Frémont, Isabelle	French, Burgundy	French, Domonique	French, Frank	French, Harvey
French, James	French, Larry	French, Linda	French, Michael	French, Nancy	French, Nina
French, Phillip	French, Stacie	Frenzel, Reinhard	Frescholtz, Jenny	Fresco, Colleen	Freson, Neil
Fresquez, Nicole	Frethem, Gail	Freud, Teri	Freudenberg, Betty	Freund, Tessa	Frew, Dorothy
Frey, Andrew	Frey, Brenda	Frey, Kimberly	Frey, Lisa	Frey, Michael	Frey, Patty
frey, sieglinde	freyenschlag, silvia	Frias, Vanessa	Fricano, Marian	Frick, Patricia	Fricker, Nancy
Friday, Jean	Friday-Craft, Betty	Fridley, Jeannette	Fridtjofsen, Jan	Fried, Carmen	fried, marc
Friedel, Tom	Friedenbach, Maggie	Friedenson, Louise	Friedhoffer, Jeffrey	Friedland, Thomas	friedman, alan
Friedman, Carolyn	Friedman, Irwin	Friedman, Jeanne	Friedman, Marcia	Friedman, Marya	Friedman, Michael
friedman, rachel	Friedman, Roni	Friedman, Terry	Friel, Marvin	Friemoth, Tana	Friend, David
Friend, Judith	Friend, Karen	Friend, Peter	Frierson, Jessica	Fries, Warren	Friese, Darlene
friess, helga	Friessen, Michelle	Frieze, Victoria	frigo, dina	frigo, rick	Friis, Rolf
Frisard, Joe	Frisbey, Pam	Frisch, Brianna	frisch, jonathan	Frisch, Lita	Frischer, Linda
Frischmuth, Denyse	Frishkopf, Barbara	Frishman, Wendi	Fristo, Alicia	Frith, Samantha	Fritsch, Robert
Fritz, John	Fritz, marilyn	FRITZ, RON	Fritze, Margaret	Frizane, Paul	Frizell, Virginia
Friziellie, Shannon	Froehlich, Noelle	Froehlich, Sabine	Froh, Courtney	Froiland, J	Fromer, Megan
Fromer, Robert	Fronce, Linnea	Froncillo, Amber	Frost, Amanda	Frost, Beryle	Frost, Chris
Frost, Joan	frost, michael	Frothingham, Sara	Frounfelter, Earl	Fruechting, David	Fruen, Jeanette
Frug&#65533;, Doug	Fruge, Aaron	Frullo, Denise	Frusteri, Marianne	Fruth, jessica	Frutiger, Keith
Fry, Alexis	Fry, Eric	Fry, Gail	fry, Mar	Fry, Marcus	Fry, Miguela
Frye, Donna	Fryer, jill	Fryer, Sherri	Fryer, Wendy	Fryling, Kirsten	Fuchs, Frank & Lucy
Fuchslocher, Bryna	fudala, cathy	Fudemberg, Longwillow	Fuderer, Laura	Fuell, Joyce	Fuelling, Kelli

Fuentes, Ada	Fuentes, Caroline	Fuentes, Lisa	Fuentes, Luis	Fuerst, Marlene	Fuerst, Robert
Fuessel, Chere	Fugate, Kenneth	Fugate, Peggy	Fugitt, Candis	Fuguet, Katherine Darcy	Fuhrer, Corey
Fuhrer, Holly	Fuhrman, Jade	Fuhrmeister, Gary	Fuica, Isabel M.	Fulcado, Esbeidy	Fulcher, Diane
Fulginiti, Joanna	Fulkerson, Taylor	Fuller, Anne	Fuller, Deborah	Fuller, Erin	Fuller, Geoffrey
Fuller, George	fuller, gerry	Fuller, Lisa	Fuller, Meredith	Fuller, Sharon	Fuller, Skipper
Fullerton, Sandra	Fullman, Rebecca	Fulton, Andrea	Fulton, Sally	Fulton, Stephen	Fultz, Maxine
Fulwiler, Fran away	Fumarola, Aaron	Fumarolo, Michael	fumo, geno	Fung, Laura	Funicelli, Janet
Funk, William	FUNKE, EMILY	Funkhouser, Betty	fuqua, chad	Furbeck, Deborah	FURBER, JESSICA
Furberg, Sven	Furcha, Rae	Furey, Nancy	Furgang, Ilene	Furgiuele, Sam	Furlong, Heather
Furlong, Sharon	Furman, Laura	Furneisen, Richard	Furness, Kathleen	furno, sarah	Furr, Elizabeth
Furst, James	furth, glenn	Furukawa, Lee	Furuta, Michael	Furutate, Midori	Fusaro, Amelia
Fusco, James	Fuss-neal, Nina	Fuszard, Aimee	Futrell, Peg	Futrell, Sherrill	Futrick, Wendy
Futterman, Sanja	G Heinle, Janet	G, Barry	G, David	G, Holly	G, K
G, K	G, Liliana	G, M	G, Megan	G, Priscilla	G, Rachel
G, Steven	G, T	G., Sabine	Ga, Monika	Gaarder, Brian	Gaba, Suzilei
Gabardi, Marc	Gabbard, Terry	Gabbay, Edmond	Gabbe, Nova	Gabel, Kim	gabel, rachel
Gaber, Diane	Gabino, Amparo	Gable, Elizabeth	Gabrick, Christine	Gabrie, Joan	Gabriel, Carolyn
Gabriel, Judith	Gabriel, Michael	Gabriel, Robert	Gabrisko, Tracie	Gaccione, Delores	Gackenheimer, Ryan
Gadbois, Peter	Gadbois, Robert	Gaddon, Ron	gadient-heberlein, maija	Gadzia, Sandy	gaede, marnie
Gaffney, Juan Pedro	Gaffney, Mal	Gaffney, Marie	Gafford, Kathy	Gage Boone, Debbie	Gage, Beverly
Gage, Kyle	gage, ron	Gaglia, Sharon	Gagliano, Daryl	Gagliano, Debra	Gagliano, John
Gagliano, Mia	Gagliardi, Thomas	Gagnon, Arthur	Gagnon, Brian	Gagnon, Lisa	Gagnon, Marsha
Gagomiros, Keith	Gaietto, v	Gaines, Bob	Gaines, Lorraine	Gaines, Nora	Gaiter, Leslie
Gaither, Lena	Gaither, Rae	galagger, mika	Galang, Karen	Galante, Susan	Galanti, Tera
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Gale, Daryl	Gale, Deborah	Gale, Olivia	gale, tipa	Galea, Lisa	Galecki Polk, Wendy
galegar, dinna	Galgocz-Deak, Angela	Galica, Kenneth	Galica, Lynne	galietti, catherine	Galiffa, Dior
galindo, Emily	Galindo, Nora	Galindo, Ruth	Galitzine, Judy	Gall, Mark	Gall, Nancy
Gall, Therese	Galla, Juli	Gallagher, Arthur M.	Gallagher, Eileen	Gallagher, Frances	Gallagher, Jana
Gallagher, Julie	Gallagher, Margaret	Gallagher, Martha	Gallagher, Mary	gallagher, Maureen	gallagher, mike
Gallagher, Thomas	gallanosa, kristin	Gallant, Sherry	Gallardo, Charlotte	Gallardo, Deborah	Gallego, Carlos
Gallego, Leonel	Gallegos Deidán, Gabriela	Gallegos, Collette	Gallegos, Nicolas	Galletti, Lori	Galletti, Marion
Gallien, Sabrina	galliher, dianne	Gallik, Bonnie	gallin, kay	Gallo, Kathryn	Gallo, Kim
Gallo, Marithza	GALLO, MICHELLE	Gallop, Amanda	Gallou, Priscilla	Galloway, David	Galloway, Sara
galluzzo, Cara	Galordi, Barbara	Galterio, Judith	Galuskin, Eileen	Galvan, Johnny	Galvani, Peter
Galvao, Isabel	Galvin, Mary	Galvin, Sister Bernie	Gama, Gisela	Gama, Juanita	Gamache, Melanie
gambardella, rosanna	Gambardella, Stella	Gambill, Isabella	Gamble, Adele	Gamble, Albert	Gamble, Bridget
gamble, fairlee	Gamble, Jessica	Gamble, Vicky	Gambocorto, M.Sharon	Gambriel, John	games, kathy
Gamez, Marco	Gammel Koonce, Cheryl	Gamradt, Hagen	Gamsby, Laura	Gamstetter, Barbara	Ganatra, Balvant
Gandara-Wakin, Melissa	ganMoryn, Croitiene	Gann, Sara	Gannett, Katherine	Gannon, Barbara	Gannon, Ellen
Gannon, Liz	gannon, patricia	Gannon, Shannon	Gano, Charlotte	Gans, Donna	Ganshaw, Debra
Ganske, Lori	Ganter, Steven	Ganzer, Diane	gaona, augustine	Gapsch, Amanda	Garagozloo, Ben
Garber, Kenneth & Sandy	garber, misty	Garber, Paula	Garber, Peter	Garbrick, Kathe	Garc►a, Steven
Garcia III, Louis	Garcia S, Irma	Garcia, Amanda	Garcia, Ana	garcia, april	Garcia, Bernadette
Garcia, Beverly	garcia, carmel	Garcia, Chanel	garcia, david	Garcia, Dawn	Garcia, Debra
Garcia, Edward	Garcia, Elias	garcia, erin	Garcia, Evette	Garcia, Flor	Garcia, Gabriela
garcia, george	Garcia, George	Garcia, Gilbert	Garcia, Irene	Garcia, James	Garcia, Jessica
Garcia, Joanna	Garcia, Jose	Garcia, Joselyn	Garcia, Kayla	Garcia, Kristal	Garcia, Lauren
Garcia, Leonidas	Garcia, Luis	Garcia, Luz	Garcia, Lydia	Garcia, Marie	Garcia, Mark
Garcia, Mercedes	garcia, miguel	Garcia, Nicolas	Garcia, Otto	Garcia, Patricia	Garcia, Peggy

Garcia, Ph.D.-ABD, Ben F.	Garcia, Porfirio	Garcia, Puri	Garcia, Ramon	Garcia, Samantha	Garcia, Sarah
Garcia, Silvana	Garcia, Susan	Garcia, Suz	Garcia, Tori	garcia, vanessa	Garcia, Vanessa
Garcia, Yolanda	Garcia, Yolanda	GARCIA, YVONNE	garcia, zulema	Garcia-Castro, Maritza	Garcia-Guevara, Lydia
Garcia-Palao, Antonio	Garcia-Tamaran, Ramon	Gardiner, Robert	Gardiner, Ronald Brian	Gardiner, Trish	Gardner, A.
Gardner, Addie	Gardner, Cheryl	Gardner, David	Gardner, Ivette	Gardner, J.	Gardner, Jennifer
Gardner, Kim	Gardner, Kim	Gardner, Lisa	Gardner, Louise	Gardner, Louise	Gardner, Paul
Gardner, Robin	gardner, sandy	Gardo, Debbie	Garen, Jan	Garescher, Marie	Gareuy, Jenene
Garfield, Dave	Garfield, Linda	Garfinkel, Nina	Garhart, Christine	Garibay, Abigail	Garitty, Michael
Garlan, Amber	Garland, Antoinette	Garland, Caroline	Garland, Newton	Garlette, Bill	Garlit, Donald
Garman, Heather	Garman, Ian	Garmon, Toni	garms, rachel	Garnaat, Charles	Garner, Ada
Garner, Ann	Garner, Gioia	Garner, Joanna	Garner, Michael	garner, rod	Garnett, juanita
Garnier Kruse, Lynn	Garnier, Joan	Garnjost, B.J.	Garofalo, Frankie	Garofalo, Gina Marie	Garofalo, YM
Garoutte, Brian	Garratt, Liz	Garrecht, Jamila	Garretson I, Jfff	Garretson, Leslie	Garrett, Carole
Garrett, Christen	GARRETT, DAPHNE	Garrett, David	Garrett, David	Garrett, Desiree	Garrett, Eva
Garrett, Jan	Garrett, Jo	Garrett, Mary	Garrett, Natalie	Garrett, Rhonda	Garrett, Sophie
Garrett, Steve	Garrido Leiton, Cristina	Garriott, Arlene	Garrison, Anita	Garrison, Casey	Garrison, Jacob
Garrison, Jule	garrison, kima	Garrison, Patricia	Garrison, Suzanne	garrison, Tamika	Garritson, David
Garrity, Timothy	Garron, Steven	garry, william	Garske, Ray	Garton, Katie	Garvett, Esther
Garvett, Esther	Garvett, Esther	Garvey, Lydia	Garvey, Mark	Garvey, Nina	garvie, frieda
Garvin, Cindy	Gary, Jacqueline	Gary, Jennifer	Garza, Carmen	Garza, Esther	Garza, Judeen
Garza, Monique	Garza, Rick	garza, wenceslao	GARZON, ANNA	Gasco, Christine	Gash, Sean
Gaskill, Eric	Gaskill, Sharon	Gaskin, Rebecca	Gaskins, Melissa	gaspar, elizabeth	Gaspar, Liz
Gaspar, Stephanie	gaspard, catherine	Gasperi, Edward	gasperi, patrizia	Gasperment, Nancy	Gaspero, Cheri
Gassel, Virginia	Gassen, Steven	Gassowska, Danuta	Gast, Sandra	Gaston, Margaret	Gatcomb, Bobbi
Gately, Audra	Gates Bryant, vicki	Gates, nancy	Gates, Ronald	Gates, Sandra	Gates, Sandra
Gatewood, Jewelldean	Gathing, Nancy	Gathing, Nancy Ann	Gathman, Mary	Gatica, Anne	Gatlin Halcomb, Emily
gatner, judy	Gatto, Gina	Gatz, Joan	gatz, lindsay	gauden, Steve	Gaudette, Caitlin
Gaudette, Lynn	Gauger, Connie	Gaughan, Elizabeth	Gaughan, Jill	Gaul, Mary	Gault, Carol
Gault, Ramona	Gault, T	Gaumond, Ashley	Gauss, Terrie	Gauthier, Sarah	gavel, deborah
Gavey, Barbara	Gavina, Dana	Gavrin, Ginnie	Gaw, Susan	Gawthrop, Janet	Gay, Cynthia
gay, willie	Gaya, Alexander	gayer, donna	Gayken, Aaron	Gaylord, Larry	Gaynor, Nedra Burch
Gaynor, Robert	Gayton, Thomas	Gazzola, Diana	Gazzola, Linda	gazzoli, eliana	Gearhart, Marilyn
Geary, Allen	Geary, Donna	Geary, Lisa	Gebczyk, Diana	Gebhard, Tina	Gebhart, Tom
Gebicki, Sheri	gebl, carina	Geddes, Barbara	Gedrose, Tamara	Gee, Diana	Geel, Mic
Geer, Terrillyn	geery, Jodi	geeves, sharon	Gegner, Jack	Gehman, Beth	Geho, Will
Gehres, Wesley	Gehrke, Jay	Gehrking, Sue	Geiger, Joni	Geiger, Marcia	Geiger, Vincent
Geiges, Marion	Geisen, Wanda	Geisen, Wanda	Geisler, Eric	Geisness, Margaret	Geist, Cathy
Geist, Harold	Geist, Sandra	geitner, greg	Gekov, Vera	Gelabert, Sylvette	Geldart, Kathleen
gelfand, carol	Gelfer, M.	gelibert, joseph	Gelinas, Allyson	Gellar, Michael	Geller, Barbara
Gelles, Kat	Gellman-Rodriguez, Donna	Gelman, Seth	Gelsomino, Rene	Gem, Martin	Gemind, Sara
Gemmell, Doug	Gemmill, Rebecca	Genao, Gina	Genaze, Matthew	Gendreau, Denise	Gendron, Bob
Gendron, Robert	Gendron, Sandra	Gendvil, Derek	Gengo, Julie	Genn, Nancy	Gennarelli, Michael
Genovese, Eric	Genshaw, Jeanna	Gensler, Donna	Gensor, Eda	Gent, Sandra	Gent, Valli
Gentes, Amy	Gentile, Smaragda	Gentili-Lloyd, Mika	Gentle, Deanna	Gentry, Jeri	Gentry, Katherine
Gentry-Moore, Moira	Gentzel, Lani	George, Betsy	George, C	George, Correne	GEORGE, DAVINA
George, Donna	George, Elaina	George, James	George, Kim	George, Lloyd	George, Mark
George, Misha	George, Richard	George, Sarah	George, Shannon	George, Therese	Georgiton, Mary
Georgius, Shannon	Geoxavier, Leon	Geraci-Benson, Arlene	gerardi, jane	Gerber, Beverly	Gerber, Deb
Gerber, Eric	Gerdes, Althea	gerdes-mcClain, william	Geredien, Ross	Gerendasy, Betty	Gerhardt, Deborah
Gerhardt, Marken	Gerhart, Barbara	Gerken, Deeann	Gerl, Carol	Gerlach, Randy	Germaine, Cynthia
German, Dianne	Germann, Lawrence	Germer, Mark	gerold, daniel	Gerold, Marina	Gerovac, Crystal

Gerrard, Penny	Gerritz, Gloria	Gerro, Anne	Gerry, Susan	Gersh, Iris	Gershanoff, Mary Dana
Gerspacher, Monika	Gersten, Lewis	Gertig, Linda	Gertler, Doris	Gertrudis, Andrea	gertz, jay
Gervasi, Norma	Gessert, Ann	Gessert, Kate	Getchell, Lauren	Gethard, Paul	Gettier, Stephenie
GETTY, A	Getz, Alzara	Getzels, Gabriel	Geurkink, Sue	Gevarter, Mona	Geye, Shirazzi
Geyer, Lisa	Geyer, Michalean	Geyer, Sandra	Ghafari, Jeanie	Ghanta, Ms.Krishna	Ghara, Kelly
Ghazi, Chantale	Gheiler, Sasha	Ghiggia, Michelle	Ghiotto, Christina	Ghirardini, Carol	Giacomelli, Maria Mia Glori
Giacoppo, Janna	giaime, janine	Gianikos, Cathy	GIANNETTO, CHARLOTTE	Giannouli, Sofia	Gianola, Morgan
Giantonio, Jennifer	Giardino, Margaux	Giardino, Pam	Gibas, Linda	Gibb, Robert	Gibbemeyer, Erin
Gibbons, Adam	Gibbons, Becky	gibbons, cate	Gibbons, Joe	Gibbons, Marcia	Gibbons, Paul
Gibbons, Stacy	Gibbons, Susan	Gibbs, Brian	Gibbs, Cathy	Gibbs, Kathleen	Gibbs, Kathy
Gibbs, Tammy	Gibbs, yvonne	Giblin, Thomas	Gibney, Norma	Gibney, Pamela	Gibson, Barbara
Gibson, Carmen	Gibson, Cheryl	Gibson, Donna	Gibson, Gregory	Gibson, Janice	Gibson, Jean
Gibson, Jody	Gibson, Jody	Gibson, Jody	Gibson, John	gibson, kimberly	Gibson, Lucy
Gibson, M Diane	Gibson, margaret	Gibson, Mark	Gibson, Mary	Gibson, Raymond	Gibson, Scott
Gibson, Scott	gibson, wendy	Gidel, Michael	Giere, Linda	Gierok, Julie	Giese, Bill
Giese, John	Giese-Zimmer, Astrid	Giesick, Christy	Giesken, Jan	Gifford, Maria	Gifford, Teresa
Giffroy, Renee	Gigandet, Gina	Gigantino, Holly	Gilbert Dzurilla, Amanda	Gilbert, Camille	Gilbert, Don
Gilbert, Kevin	Gilbert, Kris	gilbert, leah	Gilbert, Leahana	Gilbert, Marian	Gilbert, Pamela
Gilbert, Pat	Gilbert, Paula	gilbert, sue	Gilbert, TIMOTHY	Gilbertsen, Shari	gilbreath, John
Gilchrist, Amber	Gilchrist, Cheryl	Gilchrist, Clarice	Gilchrist, Helen	Gildehaus, Marie	Giles, Al
Giles, Rebeca	Giles, Renae	Giles-Straight, Carol	Gilfillan, Dwayne	Gilford, Elfi	Gilgoff, Nancy
Gilham, Brian	Gilhart, Bonita	Gilhuys, Anthony	gill, angela	Gill, M	Gill, Susan Ann
Gillam, Kelly	Gillanders, David	gillaspie, lynda	Gillespie, Alycia	Gillespie, Peter	Gillespie, Sharon
Gillespie, Sharon	Gillespie, Sherri	Gillespie, sheryl	GILLESPIE, wayne	Gillespy, Nicole	Gillette, Elizabeth
gillette, kenneth	Gillette, Mary-Lou	Gillette, Nancy	Gillham, Pauline	Gilliam, C	Gilliam, Jo-Lynn
Gillick, Shannon	Gilligan, Ainslie	Gilliland, Bernice	Gilliland, Judy	Gilliland, Ken	GILLILAND, ron
gilliland, ron	Gillis, Dylan	Gillis, Edith	Gillis, Jessica	Gillis, Patricia	Gillissen, jerry
Gilly, Martin	Gilman, Diane	Gilman, Harold	Gilman, Monica	Gilman, Nicole	Gilmore, Alyssa
Gilmore, cynthia	gilmore, jamie	Gilmore, Jeanene	Gilmore, Niles	Gilmore, Robert	Gilreath, Donald
Gilroy, Bryan	Gimenez, Miguel	Gindele, Abigail	Gingery, Suze	gingras, teresa	gingras, teresa
Ginsberg Smith, VIVI	Ginsberg, Barbara	Ginsburg, lori	Ginzu, jenny	Gioia, Linda	Giordani, Mark
Giordano, Deborah	Giordano, Donna	Giordano, Lindsey	Giorgio-Poole, Marilyn	Giovan, Christopher	Giovanetti, Joan
giovanni, dana	Giovino, Maria	Gipple, Gail	Gipson, Jan	Gipson, Raymond	Giraldi, Michelle
Giraldi, Wanda	Girard, Beth	Girard, MaryJo	Girdner, J.	girl, nature	Girton, Barbara
gisèle, bonnin	Gish, Jake	Gish, W.	gisler, jennifer	gisler, michèle	Gisselquist, Carol
Gist, Cameron	Gisvold, Deb	Gitman, Fay	Gits, Terri	Gitschier, Jennifer	Gitter, Brenda
gittlen, william	Giugni, Natalina	Giuliani, Roseanne	Giuliano, Matty	Givens, Cheryl	Givens, Nancy
Gize, John	Gizel, Mary	Giznsky, Ronita	Glace, Oliver	Glackin, Joseph	Gladstone, Jean
Gladstone, Russ	Glaeser, Madeleine	Glaeser, Wolfgang	Glaeske, Lynne	Glancy, Joann	Glandon, Clarice
Glarum, Susan	Glaser VN, Gail	Glaser, Carla	Glaser, Charles	glaser, craig	Glaser, Helene
Glaser, Susan	Glasgal, Mortimer	Glasgow, Virginia	Glasman, Wayne	Glasner, L.	Glass, Amanda
Glass, Jordan	Glass, Paul	Glass, Richard	Glass, Robert	Glasscock, Rita	Glasser, Hannah
Glassman, Charlene	Glatt, Charles	Glavina, Sonja	GLAZAR HOFBAUER, HELENA	Glazebrook, David	Glazer, Mary
Glazier, greg	Glazier, P	Gleason, Lynn	Gleason, Mindy	Gleaves, Donna	Gleckel, Linda
gleich, sue	Gleitsman, Judy	Glenn, David	Glenn, Debra	Glenn, Julie	Glenn, Mallory
Glenning, Erin	GLENN-LAWSON, JUNE	Glesne, Lynn	glick, barbara	Gliem, Deke	glier, ingeborg
Glinski, Richard	Glish, Kathy	Glisson, Candie	Glisson, Nancy	Glitzenstein, Jeff	Gliva, Stephen
Gloe, Janice	Gloor, Carol	Gloor, Prisca	glore, gary	Glosky, Veronika	Glover, Harry
Glover, Laura	Glover, Michael	Glover, Tim	Glover, William	Glovin, Deb	gluckman, geoff
Glueck, Heike	Glynn, Aileen	Gmelin, Michael P	Gmutza, Erin	Gnath, Alex	Gocinski, Michael
Gockowski, Marilyn	Godbee, Allycia	Godbey, L.	Godbey, Vance	Godbout, Jackie	Godby, Debbie

Goddard, Megan	Goddard, Tom	Godels, Joyce	Goden, G	Godfrey, Ann	godfrey, laura
Godfrey, Marilyn	GODFREY, RAYMOND	Godin, Amanda	godin, ivana	godin, janice	Godinez, Richard
Godley, Linda	Godoy, Miriam	Godoy, Susan	Godsey, Phillip	Godwin, Amy	Godwin, Brenda
godwin, Nancy	Godzicki, Joanne	Goebel, Aria	Goehring, Roxanne	Goel, Krishna	Goellner, Paula
Goeschl, Donald	Goeschl, Kathryn	Goetinck, Glenys	Goetinck, Jean	Goetschius, Lascinda	Goetz, Janet
Goetz, Linda	Goetz, Meg	goff, ang	Goff, Emery	Goff, Frances	Goff, Gina
Goff, Karyn	Goff, Robin	Goffe, George	Goforth, Michelle	Goforth, Tif	Goga, Susan
Goggins, Ben	Gohlke, Linda	Gohlke, Linda	Gohsman, Tery	Goin, Wayne	Goines, Kiersten
Gokey, Jennifer	Golan, Mirit	Gold, Beth	Gold, Brian	Gold, Carol	Gold, Deanna
gold, eva	Gold, Faith	Gold, Howard & Mary	Gold, Katrina	Gold, Meredith	Gold, Michael
Gold, Rebecca	Gold, Susan	Goldbach, Martha	Goldberg, Anne	Goldberg, Barbara	Goldberg, Daniel
Goldberg, Elisa	Goldberg, James	Goldberg, James	Goldberg, Laura	Goldberg, Lawrence	Goldberg, Susan
golde, bridge	Golden, Amy	Golden, Anthony	Golden, Carla	Golden, Debra	Golden, Dionte
Golden, Jerry	golden, laura	Golden, R	Golden, Susan	Golden, Victoria	Goldenberg, Helen
Goldenberg, Helen	Goldfarb, Georgia	Goldin, Bobbi	Goldin, Susan	Golding, Will	Goldman, Carol
Goldman, Duane	Goldman, Emily	Goldman, Erika	Goldman, Harold	Goldman, Paula	Goldman_Hull, Sergi
Goldsmith, Charles	goldsmith, charles	goldsmith, d	Goldsmith, Harriet	Goldsmith, Ken	Goldsmith, Marlene
GOLDSMITH, SHERRIE	goldstein, carol	goldstein, kim	Goldstein, larry	Goldstein, Roz	Goldstein, Steven
goldstein, sue	Goldston, Carolyn	Goldwater, Glenda	Golembiewski, Deborah	Goll, Eva	Gollespie, Kim
Gollogly, Bonnie	Golson, Gayle	Golz, Sarah	Gombert, Julia	Gomborone, Mike	gomes, Jeffrey
Gomes, Veronica	Gómez Isaac, Ursula	Gomez Jimenez, Salvador	gomez, alma	Gomez, Annette	gomez, mark
Gomez, Patty	Gomez, Sylvia	Gomez, Sylvia	gomez, Vanessa	Gomolka, Denise	Goncalves, Daniela
Goncalves, Flavia Cristina	Gonce, Sam	Gonce, Samuel	Gonzales Nielsen, Rose	Gonzales, Annette	Gonzales, Antoinette
Gonzales, Antoinette	Gonzales, Bronte	GONZALES, GAETANE	Gonzales, Joe	Gonzales, Maria	Gonzales, Rose
Gonzales, Tara	gonzales, wanda	Gonzalez, Abigail	Gonzalez, Adam	Gonzalez, Alan	Gonzalez, Alberto
Gonzalez, Angela	Gonzalez, Anita	Gonzalez, Anna	Gonzalez, Ariana	Gonzalez, Charlie	Gonzalez, Diane
Gonzalez, Evelyn	Gonzalez, Gaby	Gonzalez, Gina	Gonzalez, Graciela	Gonzalez, Guillermo	Gonzalez, Heidi
Gonzalez, Helen	Gonzalez, Jeannie	Gonzalez, Juanita	gonzalez, julio	gonzalez, kristin	Gonzalez, Liz
Gonzalez, Lorelee	Gonzalez, Luis	Gonzalez, Marcelo	Gonzalez, Maria	Gonzalez, Martha	Gonzalez, Rachel
Gonzalez, Raul	Gonzalez, Rosario	Gonzalez, Sonia	Gonzalez, William G	Gonzalez, Yazmin	Gonzalez, Yvette
gonzalezreyna, gina	Good, Al	Good, Gwen	Good, Joel	Good, Lisa	goodall, jacqueline
Goode, Brenda	Goodge, Sandy	Goodheart, Patia	Goodin, Ben	Goodin, Dena	Goodin, Noelle
Gooding, Shana	Goodlett, Lisa	Goodman, Amy	goodman, danny	Goodman, Ellen	Goodman, Gretchen
Goodman, Hannah	Goodman, Laney	Goodman, Margaret	Goodman, Margaret	goodman, margy	Goodman, Patricia
Goodno, Mary	Goodrich, D'Arcy	Goodrich, Lisa	Goodrich, Lou	goodrich, maurice	goods, severin
Goodson, Bryce	Goodson, Patricia	Goodspeed, Nikia	Goodstein, Karen	Goodwin, Charles	goodwin, joseph
Goodwin, Julie	goodwin, mattie	goodwin, raven	Goodwin, Ray	Goodwin, Stephanie	Goodwin, Thomas
Goody, Jessica	Goody, Nancy	Goodyear, Maxine	Goracke, Susan	Goral, Edward	Gorby, Karen
Gorczyca, Julita	Gorden, Jeannine	Gordian, Priscilla	Gordin-Kaviani, Tali	Gordon, Alexandra	Gordon, Amanda
Gordon, Amberlee	Gordon, Billie	Gordon, Carol	Gordon, Coco	Gordon, Elisabeth	Gordon, Eve
Gordon, Gilda	Gordon, Jean	Gordon, Judith	Gordon, Julie	Gordon, Kristina	Gordon, Lacey
Gordon, Lauretta	Gordon, Lee	Gordon, N	Gordon, Roswell&Marilynn	Gordon, Stephen	Gordon, Susan
Gordon, William	Gordon-Lucas, Bonnie	Gore, Jean	Gore, Robert	Gorelick, Grace	gorenfeld, william
Gorey, Mark	gorgei, monica	Gorgo, Jennifer	Gorman, Carrie	Gorman, Donna	Gorman, Greg
Gormley, James	Gorn, Scott	Gorndt, Isabel	gorner, susan	Gornick, Stephanie	Gornitzka, Anne
Gorrin, Eugene	Gort, Susan	Gorton, Elizabeth	Gorton, Michelle	Görz-Lenzen, Dr. Dagmar	Gosine, Sandeep
Gosker, Erika	Goslee Reed, Sarah	Goss, Barbara	goss, sharon	Gosslee, Susybelle	Gossmann, Anni
Gotesky, Stephen	Gothelf, Elizabeth	Gotis, Christine	Gotkowska, Ela	Gotkowska, Ela	Gotlib, Eva
Gottesman, Ziva	Gottfried, Julian	Gottfried, Susan	Gottfried, Tby	Gotthelf, Judy	Gottlieb, Beth
Gottshall, Margaret	Goubran, Catherine	Gouet-Migos, Danielle	Gouge, Deborah	Gouin, Dana	Gouker, Patti
Goulart, Lorie	Gould Massoubre, Ann	Gould, Anita	Gould, Catherine	Gould, DAVID	Gould, Don

Gould, Ed	Gould, Franklin	Gould, Jacqueline	Gould, Jay	Gould, Raleigh	Gould, Rod & Rosaline
gould, stefanie	Goulding, Deidre	Gounaris, Anastasia	Gourley, Thomas	Gourville, Tracy	gove, Barbara
Gove, Dianne	Govender, Rachel	Gover, David	Govito, Stacey	Govoni, Amy	Govreau, Kathy
Gowan, Mark	Gowani, Nancy	Gowatsky, Jaimie	Gowert, Marie	Goynes, Beverlee	Gr, Sophie
Graae, Linda	Graas, Alex	Grabsch, Dagmar	Grace, Aaron	Grace, Amy	Grace, Donna
grace, Jan	Grace, Norine	Gradoni, Peter	Grady MacRae, Carol	Grady MacRae, Carol	Grady, Julie
Graf, Heather	Graff, Emma	Graff, Ingrid	Graff, Wanda	Graffagnino(ne Novakoski), Mary Ann and Mr. Frank	Graffell, Jess
Graffeo, Stephan	Graffin, Jeanne	Grage, DL	Grage, Janina	Gragg, Sabrina	Graham, Angus
Graham, Bob & Jan	GRAHAM, C.M.	graham, constance	Graham, Dan	Graham, Danielle	Graham, Eve
Graham, Guy	Graham, Holly	Graham, Ivy	Graham, J. Brian	Graham, John	Graham, Judith
Graham, Karen	Graham, Karyn	Graham, Kelly	Graham, Lynn	Graham, Mikaila	Graham, Sallie
Graham, Seana	Graham, Susan	Graham, Tyrone	Grainger, Elizabeth	Grajeda, Becky	Graminski, DM
Grammer, Charles	Grammer, Jensen	Gramza, Amy	GRANATA, TAMMY	Grancharov, Plamen	Grand, Robert
grande garcia, oscar	Grandt, E	Granger, Sharon	Granieri, Mary Ann	Grano, Karen	Granofsky, Gabrielle
Grant, Alexander	Grant, Candida	Grant, Emperatriz	Grant, Gordon	Grant, James	Grant, Janice
GRANT, KENNETH	Grant, Kristina	Grant, Lynn	grant, michael	Grant, Nancy	Grant, Nicole
Grant, Robert	Grant, Susan	grant, teresa	Grant, Tiffany	Grany, Stacy	Grass, Jennifer
Grass, Tobias	Grasseschi, Michael	GRASSI, THOMAS	Grassman, Mark	GRASSO, DINA	Gratz, Britta
Gratz, Gerd	Graubner, Gabriel	Grauer, Denise	Graul, Kara	Graver, Chuck	Graves, Caryn
Graves, Coral	graves, john	graves, michelle	Graves, Royal	Gravitt, Glenda	Graw, Christina
Grawunder, Marc	Gray, Alfred	Gray, Alice D	Gray, Betty	gray, chanel	Gray, Claudia
Gray, Courtney	GRAY, D	Gray, Elaine	Gray, George	Gray, Herbie & Glynda	Gray, Jack
Gray, Jackie	Gray, Jean	Gray, Joseph	Gray, Kristin	Gray, Lorraine	Gray, MIkaela
Gray, Nancy	Gray, Rebecca	Gray, Robert	gray, rubietta	Gray, Siobhan	Gray, Sylvia Ruth
Graydon, Miriaha	Grays, Michael	Grayson, Kelly	GRAYSON, VISTAANNE	Grazioli, Silvia	Graziosa, Anthony
Graziosi, Diane	Grazzi, Valentina	grazzianni, arianna	Greany, Dan	Greathouse Gause, Megan	Greathouse Neel, Donna
Greaves, Donald	Greaves, Lee Ann	Greb, Monika	Grech, Rhyan	Greco, Andrea	Greeff, Sahve
Green, Alice	Green, Amy	Green, Amy Nichole	Green, Caitlin	Green, Carl	Green, Carol
green, christopher	Green, Deanna	GREEN, DON	Green, Dorie	green, edye	Green, Faith
Green, Fff	Green, Helen	Green, James	Green, James	Green, Jamie	Green, Jason
Green, Jill	Green, June	Green, Kerstin	Green, Kevin	Green, Lance	Green, Lawrence
Green, Lowell	Green, Marly	green, melissa	Green, Meredith	Green, Nicole	Green, Pam
Green, Rhonda	Green, Roberta	Green, Sally	Green, Steve	Green, Tabatha	Green, Taegan
Green, Terry	Green, Virginia	green, virginia	Green, Zoey	Greenawalt, Alan	greenbaum, yvonne
Greenberg, Bert	greenberg, cindy	Greenberg, Corinne	Greenberg, Donna	Greenberg, Eileen	Greenberg, Frances
Greenberg, Helaine	Greenberg, Jonathan	Greenberg, Joyce	Greenberg, Susan	Greendyk, Jason	Greene, Anne
Greene, Barbara	Greene, Carolyn	Greene, David	Greene, David	Greene, Eileen	greene, hollis
Greene, Ivy	Greene, James	greene, jeanine	greene, judy	Greene, Patricia	Greene, Solo
Greene, Terri	Greene, Victoria	Greene, Wayne	Greene-Little, Kamille	greener, Brigette	GREENFIELD, DAWN
Greenhalgh, Diana	Greenhill, Barry	Greenhill, Barry	Greenhow, Barry	Greenlaw, Cortney	Greenlaw, Earl
Greenlaw, Lindsey	greenleaf, sydney	Greenlee, Elaine	Greenman, Barbara	Greeno, Dorothy	Greenstein, Barry
Greenstein, Becca	GREENUP, EDWARD	Greenwald, Ken	Greenwald, Tedd&Mary Ellen	Greenway, Lumina	greenwell, ruth
Greenwood, Ben	Greenwood, Jean	Greenwood, Jennifer	Greenwood, Kenneth	Greenwood, Lillie	Greenwood, Sherree
Greenwood, Stephanie	Greer, Amy	Greer, Helen	Greer, Jamie	Greer, Jill	Greer, Lin
Greer, Trista	Gregersen, Susan	gregg, brandon	Gregg, John	Gregg, Kathy	Gregg, Raymond
Gregoire, Andre	Gregorian, Arthur	Gregory MD, Michael	Gregory, Betty	Gregory, Chilton	Gregory, Debbie
gregory, kathleen	Gregory, Kendall	Gregory, Lindi	Gregory, MaryAnn	Gregory, Patricia	Gregory, Paul
Gregory, Probyn	Gregory, Probyn	Gregory, Renee	Gregory, Steven	Gregovich, Barbara	Greiner, Tony
Greinke, Pamylle	Grell, Janeen	Gremban, Ronald	Gremillion, Sharon	Gremm, JD	Gremm, Judye
Grenard, Mark Hayduke	Grenier, Raymond	Grenzow, S	Gress, Andrea	gresser, mark	Grey, Damien
Grey, Valerie	Greymoon, Deborah	Grezaffi, Judith	Grgurich, Christine	Grib, Dawn	Gribben, Arthur

Grice, Frankie	Grider, John	griego, Yvette	Grieman, Greg	Grierson, Jim	Gries, Sylvia
Griesedieck, Carroll	Griesener, Carol J.	griffin, alysee	Griffin, Amanda	Griffin, Amy	griffin, amy
griffin, chas	Griffin, Denise	Griffin, Donna	Griffin, Erica	Griffin, Fred	Griffin, Georgia
Griffin, Ginny	griffin, lawrence	Griffin, Lisa	griffin, malik	griffin, mildred	Griffin, Nancy
Griffin, Pam	Griffin, Russell	Griffin, Sarah	Griffin, Terence	Griffin, Vivian	Griffin-Lewin, Anne
Griffith, Barbara	Griffith, Diane	Griffith, Donna	Griffith, John	Griffith, Julie	Griffith, Julie
Griffith, Loren	Griffith, Melanie	Griffith, Phoebe	Griffith, Tamhas	Griffith, Virginia	Griffiths, Devin
Griffiths, Ruth	griffiths, william	griggs, butch	Griggs, David	Grigsby, Heather	Grijalva, Antonio
grijalva, antonio	Grillo, Edgar	Grillo, John	Grimaldi, Gianni	Grimaldo, Estilita	Grimes, Gene
Grimes, Judy	Grimes, Marlene	Grimes, Nancy	Grimes, Tara	Grimley, Bernadette	Grimm, Jana
Grimm, Peter	Grimson, Martha	Grindle, Russell	Grinmanis, Stephanie	GRINNELL, MICHAEL	Gripp, Deborah
Grissett, Carolyn	Grissett, Tracy	Grissom, Brenna	Grissom, Perry	Griswold, Dean	Gritsch, Maria
grivas, caitlin	Grobe, Nicola	Grobler, Mariette	Grochowski, Norman	Groetzinger, Lorie	Groff, Marty
Grogan, Patty	Groh, Paul	Grona, Sherry	Grønbæk, Mona	Groneberg, Ralf	Groo, Carol
Groome, Malcolm	Groscost, Elizabeth	Grose, Harriet	Grose, Pat	Grosh, Mahriah	Groshong, Victoria
Gross, Barbara	Gross, David	Gross, Diana	Gross, Emily	Gross, Herbert	Gross, Howard
Gross, Howard	Gross, Louise	Gross, Marilyn	Gross, Resa	Gross, S. Jamesmarie	Gross, Steve
Gross, Thomas	Gross, Vivian	Grossman Jr, Richard	Grossman, Barry	grossman, geoffrey	Grossman, Jake
Grossman, Kathleen	Grossman, Kathleen	Grossman, Lois	Grossman, Marilyn	Grossman, Susan	Grote, Rolland and Jan
Grote, Sikt	grotegut, Kate	Grotzke, Charles	Grotzke, Mark	Grounds, Shari	Grove, Laura
Grove, Phyllis	Grove, Shel	Grovenstein, Elizabeth	Grover, Dan	Grover, Janice	Grover, Justin
Grover, Justin	Groves, Cathleen	groves, jerry	Groves, LS	Groves, Ronald	Grow, Michelle
Growney, Jessica	Groza, Mabel	gruba, francis	Grubb, Harold	Grubb, Robert	Grubbs, Jessica
grubbs, lisa	Grubbs, Russ	Gruber, Shannon	Gruener, Daphne	Gruenewald, Sarah	Gruenke, Elaine
Gruetzner, Jean	Grumboski, Antoinette	Grundhofer, Connie	Grunert, Brice	Grunes, Rodney	Grunke, Janet
Grunwald, Heather	Grunwell, David	Grush, Julie	Gruszecki, Andrea	Gruver, Chere	Gryska, Anita
Grzegorzewski, Mark	Grzeskowiak, Richard	G►ttert, Antje	Guach, Dariel	Guajardo, Genesis	Gualandi, Anna
Guan Te, Teo	guandolo, john t	Guaraldi, Thomas	Guardino, Donna	Guarino, Julie	Guarnieri, Cindy
Gudino, Laura	Gudmundsdottir, Rosa	Gudmundson, Lori	guducu baytekin, hatice	Guecheva, Detelina	Guecia, Audra
Guecia, Audra	Guell, Benjamin	Guenther, Craig	Guenther, Elizabeth	Guenther, Eric	Guenther, Jodi
Gueorguieva, Louiza	Guequierre, Helga	Guerard, Marcel	Guerci, Jeannine	guernon, mikayla	Guerra, Ana
Guerra, Fredy	Guerra, Pat	Guerra, Suzanne	Guerra, VP	guerrero, john	Guerrero, Quantisha
guerrero, rosser	Guerrette, Genevieve	guerrier, danielle	Guerriero, Laura	guerry, robin	Guest, Wayne
Guevara, Adriana	Guevara, Alicia	GUEVARA, PATRICIA	Guffanti, M.	Gugel, Ellen	gugel, gerald
Guggino, Monique	Guh, H.	Guido, John	Guidry, Nina	Guier, Richard	Guilaroff, Jon
Guilbault, Aubrey	Guilbault, Aubrey	Guilford, Lorie	guilford, sharon	Guill, Lee Ann	GUILLAUME, Celine
Guillen, Sandra	Guillermo, Pauline	Guilliams, Mary Ann	Guillot, Cindy	Guimont, Joseph	Guinan, Peggy
Guindon, Ernest	Guiney, Dennis	Gukelberger, Todd	Gula, Larissa	Gulash, Frances	Guleke, Jr., David
Gulledge, Marilyn	Gullen, Elizabeth	Gulley, Jane	Gullick, Larry	Gullo, Adriana	Gullo, Monte
Gullo, Paula	Gulyak, Sofya	Guna, Siya	gunasekera, sita	Gunay, Zeki	Gunderman, Jodi
Gunderson, Catharine	Gunderson, Susan	Gundry, Jesse	Gundvaldson, Anna	Gunn, Bob	Gunn, Leslie
Gunn, Paula	Gunn, Samantha	Gunter, Karlene	gunther, ken	Gunther, Kimberly	gupta, Catherine
gupta, sagarika	Gupton, Vicki	Gurdin, J. Barry	Gurganus, Cassie	Gurney, Rachel	Gurski, Linda
Gurtek, Brent	GUSMÃO, ELVYS	Gussman, David	Gust, Lisa	Gustafson, Amy	Gustafson, Chester
Gustafson, Deb	Gustafson, Owen	Gustafsson, Randi	Gustaveson, Nancy	Gustin, Amy	Gustinella, Thomas
Gutelius, Phyllis_An	Gutfleisch, Ellen	Gutfreund, Ed	Gutgsell, Billie	Guthrie, Barbara	Guthrie, Cathleen
Guthrie, David	Guthrie, Elizabeth	Guthrie, Lester	Guthrie, Todd	Gutierrez, Alma	Gutierrez, Andrea
gutierrez, christina	Gutierrez, Christina	Gutierrez, David	gutierrez, joe	Gutierrez, Joseph	Gutierrez, Maria
GUTIERREZ, MAXIMILLIAN F. O.	Gutierrez, Nancy	Gutierrez, Zimri	Gutsell, Reeve	Gutstadt, Ayala	Gutterman, Diane
Guttridge, Laura	Guy, Heather	Guy, Sandra	Guy, Tim	Guyer, E	Guyer, Paula
Guyette, Claressa	Guynn, Stefanie	guyon, pamela	Guyot, Jack	GUYTON, CLEAVERT	Guyton, Elaine

Guyton, Rashinna	guyumjan, levon	Guzman, Alison	Guzman, Gabela	Guzman, Icie	GUZMAN, ISRAEL
Guzman, Joseph	Guzman, Julie	Guzman, Kim	Guzman, Patricia	Guzman, Raul	Guzman, Roevel
guzman, stephanie	Guzman-Peonio, Steven	Guzm►n, Genevieve	guzzi, bernard	Gwaltney, Deborah	Gwinn, Anita
Gwyn, Steven	Gwynn, Maureen	Gx, Perry	Gynane, Kathy	Gyori, Linda	Gyurics, Lydia
H, Callie	H, Chandira	H, Dody	h, Janny	H, Jen	H, Lisa
H, Mary	H, Nancy	H, Natalie	h, Stephanie	H., Littlewolf	Haack, Deb
Haag, Andrea	Haag, Karin	Haag, Tim	Haak, Delores	Haak, Malina	Haake, Linda
Haaland, Monica	Haapala, Anssi	Haarhoff, Anne	Haas, Alan	Haas, Carol	Haas, Evelyn
Haas, Irene	Haas, Margaret	Haas, Pamela	Habben, Summer	Habel, Laurie	Haber, Arnold
Haber, Raven	haberkorn, ronald	Habiger, Paul	Habrecht, Joanne	Hack, Jacleen	Hack, Todd
hackel, helena	Hackenbruch, Rachel	Hacker, Chris	Hacker, Mark	Hackett, Gail	Hackett, Lisa
Hackett, Marcia C.	Hackett, Theresa	Hackley, Daniel	Hackner, Paul	Hadden, John	haddon, amanda
Hadjez, Claudia	Hadland, Gwen	hadley, gina	Hadley, Shela	hadrich, holgerh	HAEBERLE, KEVIN
Haefele, Ann	Haelewyn, Charyl	Haemig, Lynda	Haemmerle, Joseph	Haesly, Jack	Hafemeyer, Nicole
Haffner, Barbara	Haflich, Anne	Hafner, Amanda	Hafterson, MK	Haftl, Jennifer	Hagaman Corwin, Tammy
Hagan, Emily	hagan, Michelle	Hagan, Sena	Hagele, Bob	Hageman, Beatrice	Hageman, Marie
Hagen, Catherine	Hagen, Marghi	Hagen, Pete	Hagen, Wendy	Hagens, Jennifer	Hager, Blythe
Hager, William	Haggard, Alan	Haggard, Kristi	Haggerty, Sean	Haggerty, William	Hagglof, Suzanna
Hagood, Angelica	Hagood, Anjelika	Hahn, Debbie	Hahn, Fletcher	Hahn, Gil	Hahn, Julie
HAHN, Laura	Hahn, Mike	hahn, muggsi	Hahn, Randy	Hahn, Richard	Hahn, Richard L.
Hahn, Theodore	Hahner, Meghan	Haider, Paul	Haije, Robert	Haile, Robert	Hailstone, Joyce
Haim, Kaila	Haines, Amy	Haines, Lindsey	Haines, Sandra	Haines, Susan	Haines, Trevolyn
HAIR, KARLA	Hair, Marisa	Hair, Thomas	Haire, Linda	Haire, Melissa	Hairston, Sean
Haje, Khrystyne	Hakam, Jamila	Hakker, Kathleen	Halay, Elaine	Halbe, Rev. Glen	Halbert, Ellen
Haldeman, Jerry	Halderman, Pat	Hale, Jean	Hale, Nick	Hale, Nikki	Hale, Sharon
Hale, Shiloh	Hales, Shantele	Haley, Ann	Haley, Gloria	Haley, James	Haley, Jim
Haley, Kate	Haley, Mary	Haley, Patty	Haley, Stacia	Halfon, Marci	Halford, Amber
Hall, Alyssa	Hall, Amber	Hall, Andrea	Hall, Andrea	Hall, Arend	Hall, Bernadette
Hall, Bruce	Hall, C. Victor	Hall, Carmin	Hall, Carolyn	Hall, Casey	Hall, Chris
Hall, Cielo	Hall, David	Hall, Deborah	Hall, Dennis	Hall, Dinorah	Hall, Dodie
Hall, Elaine	hall, eliza	Hall, Emily	Hall, Eustacia	Hall, Heather	Hall, Janice
Hall, Jean	Hall, Jean	Hall, Jeannie	Hall, Jenell	Hall, Jennifer	Hall, Kappy
Hall, Kathleen	Hall, Keith	Hall, Kenneth	Hall, Margie	Hall, Nicki	Hall, Noah
Hall, Peter	Hall, Phyllis	Hall, Reggie	hall, renee	Hall, Rose	Hall, Ruth
Hall, Sherrie & Chris	Hall, Silvia	hall, sydney	hall, timothy	Hallabrin, Carol	Hallam, Karen
Hallberg, Beverly	Hallberg, Donald	Hallberg, Richard	Halleman, Cl	Hallett, Mark	Halley, Jack
Halley, Victoria	Halligan, Michele	Halligan, Sue	Hallisey, Ted	HALLMAN, JANICE	Hallmark, Mitzi
Halloran, Michael	Hall-Skank, Nick	Hallstrom, Jody	Hallyburton, William	Halom, Mark	Halounek, JoAnn
Halperin, Sondra	Halpern, Alison	HALPERN, Carol	halpern, lisa	Halpin, Lola	Halsey, Jane
Halter, Pat	Haltom, D	halus, lorraine	Halverson, Cindy	Halvorsen, Josh	HAMARD, NATHALIE
Hamblin, Sheryl	Hamboyan Harrison, T	Hamburger, Kari	Hamel, Lenore	Hamel, Madawna	Hamel, Sabree
Hamel-Brown, Kimberly D	Hamer, Suzanne	Hamer, Suzanne	Hamilton, Adama	Hamilton, Adama	Hamilton, Brandy
Hamilton, Dianna	Hamilton, Don	Hamilton, Franklin	Hamilton, Frederick	Hamilton, Heather	Hamilton, James
Hamilton, Janice	Hamilton, Jared	Hamilton, John	Hamilton, Keith	Hamilton, Kim	Hamilton, Kim
Hamilton, Kyle	Hamilton, Lucy	Hamilton, Melissa	Hamilton, Nicole	Hamilton, Pamela	Hamilton, Rebecca
Hamilton, Roy	Hamilton, Sarah	Hamilton, Stephen	Hamilton, Teresa	Hamilton, Thomas	Hamilton, Wayne
Hamilton-Donovan, Judy	Hamlin, Adine	Hammarstrom, RN, Bryn	Hammell, Cynthia	Hammer, F	Hammer, Leon
hammer, peter	Hammer, Randy	Hammer, Stephanie	Hammerli, Nathaniel	Hammermeister, Lisa	Hammett, Gary
Hammett, John	Hammett, Lori	Hammill, Ronald	Hammill, Ronald	Hammond, Beverly	Hammond, Brenda
Hammond, Cathy	Hammond, Constance	Hammond, David	Hammond, Gretchen	Hammond, Michele	Hammond, Norma
Hammond, Ryan	Hammond, Teresa	Hammonds, Eric	Hammons, Laura	Hamouxh, Nicole	Hampel, Susan
Hampson, James	Hampson, Tami	Hampton, Hugh	Hampton, Suzanne	Hampu, Michael K.	Hamran, ellyne
Hamrick, Justine	Hamrick, Lauren	Han, Guen	Han, Richard	Hanahan, Lillian	hANAS, GEORGE
Hanbury, Sherry	hancock, anna	Hancock, Barbara	Hancock, Danna	Hancock, Dorothy	Hancock, Karen

Hancock, Kathleen	Hancock, Paula	Hancock, Susan	Hand, David	Hand, David	hand, ellen
Hand, Joanne	Handeland, Ryan	Handjian, Susan	Hands, Barbara	Handwerker, Steven	Handwerker, Steven
Handy, Sherry	Hanebutt, Michael	Hanek, John	Hanes, Dorothy	Hanes, Matt	Hanes, Susan
Haney, Jack	Haney, KATHLEEN	haney, pamela	Hanft, Marjory	Hang, Jennifer	hanger, james
Hanif, Danielle	Haniford, James	Hanke, Kim	Hankin, Phyllis	Hankins, Annie	Hankins, Eugene
Hankins, Gary	Hanks-Hicks, Cheryl	hanley, amy	hanley, dennis	Hanley, Jill	Hanley, Mark
Hanley, Robbi	Hanley, victor	Hanley, William	Hanlon, Denis	hanna, penny	Hannah, Lorraine
Hannahs, Katie	hannam, john	Hannan, Margaret	Hannan, Michael	Hannigan, Lysa	Hannis, Angela
Hannon, Ian	Hannon, Lori	Hannon, Patricia	Hanon, Susan	Hanowski, Roswitha	Hanrahan, Tira
Hanratty, Mary	Hanse, Constantina	Hansell, Connor	Hansell, Jody	Hansell, Jody	Hansen Ed D, Yvonne
Hansen, A.G.	Hansen, Bev	Hansen, Carol	Hansen, Christine	Hansen, Clay	Hansen, Dameon
Hansen, Donna	Hansen, Francine	Hansen, Galen	Hansen, Holly	Hansen, Jayne	Hansen, Jillian
Hansen, Joan	Hansen, Joan	Hansen, Karen	Hansen, Kim	Hansen, Kristina	Hansen, Lani
Hansen, Loren	Hansen, Lynn	Hansen, Melissa	Hansen, Michael	Hansen, Mike	Hansen, Molly
Hansen, Nancy	Hansen, Neil	Hansen, Neil	Hansen, Nikki	hansen, paula	Hansen, Sandy
Hansen, Sandy	Hansen, Sherri	Hansen, Than	Hansen, Wendy	Hanser, Jackie	Hansford, S
Hanslik, Holly	Hanson velloo, Samara	Hanson, Art	Hanson, Cindy	Hanson, Daniel	Hanson, Donna
Hanson, Edward	Hanson, Janis	Hanson, Jennifer	Hanson, Laurie	Hanson, Maria	Hanson, Matthew
Hanson, Naomi	Hanson, Natalie	Hanson, Robert	Hanson, Sam	Hanson, Vicki	Hanta, Hashi
Ha'o, Nalani	Hapner, Donna	Hapner, Robyn	Haqq, Samara	harahan, melissa	Harbaugh, Devon
Harbeson, Charlotte	Harbin, Spencer	Harbison, Candis	harbour, miriam	hARBUTT, aLBERTA	Harde, Rucha
Hardee, David	Harden, Genie	Harden, Janet	Harden, Ronald	Harder, Kate	hardesty, heather
Hardesty, Lauren	Hardie, Debbie	Hardie, Eldridge	Hardie, Leslie	Hardies, Laurie	Hardin, Andrew
Hardin, Carol	Hardin, Delores	Hardin, Megan	Hardin, Susan	Hardin, Will	Hardin, Will
HARDING, Aubrey	Harding, Fann	Harding, Lisa	Harding, Lori	Harding, Makeda	harding, Michelle
Hardman, Thelma	Hardman, Vallene	Hardridge, Napoleon	Hardy, Angel	Hardy, H Nick	Hardy, Jane
Hardy, Kathleen	Hardy, Stephanie	Hare, Deborah	hare, sherri	Haren, Soledad	Hargest, Daniel
Hargett, Lynne	hargis, linda	Hargrave, Rachel	Hargrove, Gary	hargrove, sue	Harig, Carl
Haring, Barbara	Hariri, Meysam	Harish, Anavai	Harkaspi, Helen	Harker, Christine	Harker, Jana
Harkins, Lynne	Harkness, Gloria	Harkness, Jeremy	Harlan, Gary & Donna	Harlan, Melissa	Harlan, Michael
Harlan, Miriam	Harley, Patrick	Harlib, Amy	Harlow, Batya	Harlow, Nancy	Harlow, Rhonda
Harlow, Sheila	Harman, Sara	harman, william	harmath, elisa elsa	Harmon, David	Harmon, Jenn
Harmon, Susan	Harmon, Virginia	Harmon-Valenstein, Megan	Harms, Pamela	Harms, Sandra	harned, dana
Harnedy, Kacy	Harney, Kathy	Harold, Arthur	Haroutian, Peter	Haroy, Margaux	harp, edith e
Harp, Patricia	Harpe, Barbara	Harpe, Barbara	Harper, Alan	Harper, Allyson	Harper, Barbara
Harper, Charesa	harper, cindy	harper, jennifer	Harper, Kath	Harper, Katherine	Harper, Marilynn
Harper, Matthew	Harper, Melissa	Harper, Paige	Harper, Rachel	harper, rachel	Harper, Rebecca
Harper, Sarah	harper, t	Harper, Tom	Harper, Wilma	Harper-Winans, Corey	Harpham, Bruce
Harpole, Thane	Harpy, Jack	Harr, Shawn	Harr, Silva	harrap, elise ivy	Harrell, Bryan
Harrell, Cherl	Harrell, Sherri	Harrell, Tamara	Harrie, Susan	Harrill, Meghan	Harriman, Frances
Harrington, James	harrington, jason	Harrington, Murphy	Harrington, Nancy	Harrington, Rita	Harrington, RJ
Harrington, Tyler	Harrington-Chartier, Nancy	Harris, Alex	Harris, Althea	Harris, B	Harris, Barbara
Harris, Brenda	Harris, Chavva	harris, cheri	Harris, Christine	harris, cindy	Harris, Cynthia
Harris, David	Harris, Dawn	Harris, Debra	Harris, Diane M	Harris, Elvoria	Harris, Emily
Harris, Fama	Harris, Gail	Harris, Glenna	Harris, Guy	Harris, Harry	Harris, Hilary
Harris, Ira	Harris, Jamie	Harris, Jan	Harris, Jenna	Harris, Jennifer	Harris, Jennifer
Harris, jill	Harris, Joan	harris, john	Harris, Julie	Harris, Julie	Harris, Karen
Harris, Kevin	Harris, LJ	Harris, Lois	harris, lois	Harris, Louis	Harris, Mary
Harris, MaryLee	Harris, Nancy	Harris, Nancy	Harris, Nikee	Harris, Noel	harris, noelle
HARRIS, PATRICIA	Harris, Patricia	Harris, Paul	Harris, Polly	Harris, Ramona	Harris, Robert
harris, russell	Harris, Scott	Harris, Sharon	Harris, Shirley	Harris, Stephanie	Harris, Thomas
Harris, Tiffany	Harris, Tomoko	harris, travena	Harris, Wayne	Harris, Zeth	harrison, cate
HARRISON, CHERYL	Harrison, Ellen	Harrison, Glenda	Harrison, James	Harrison, Jeane	Harrison, Katholeen
harrison, laura	Harrison, Linda	Harrison, Marie	Harrison, Marilyn	Harrison, Rachel	Harrison, Randy

Harrison, S.	Harrison, Selena	harrison, tammy	Harrison, Tim	Harrison, Verna	Harrison, Veronica
Harriss, Marty	Harrod, Dawn	Harrod, Florence	harrott, sandra	Harrower, Laura	Harry, kina
Harshany, Dana	Harsin, Linda	hart, Alex	Hart, Barbara	Hart, Crystal	Hart, Crystal
Hart, Donna	Hart, Howard	Hart, Jamie	Hart, Kathy	Hart, Kim	Hart, Kimberly
Hart, Larisa	Hart, Miechelle	Hart, Ramona.	Hart, Sara	Hart, Susan	hart, thomas
Hart, Tricia	Hartel, Terri	Hartery, Robin	Hartford, Susan	Hartig, Frank	Hartig, Frank
Hartig, Frank	Hartigan, Stefanie	Hartington, Susan	Hartl, Janice	Hartleb, Carole	Hartleben, Christian
hartley, annelise	Hartley, Barbara	Hartley, David	Hartley, James	Hartman, Brenda	hartman, cheryl
Hartman, Elizabeth	Hartman, Eric	Hartman, Heidi	Hartman, Heidi	Hartman, James	Hartman, Jeanette
Hartman, Joanna	Hartman, Linda	hartman, nancy	Hartman, Zeke	Hartmann, Lorraine	Hartman-Shutty, penny
Hartnett, Kimberley	hartrick, Elizabeth	Hartrum, Melanie	Hartshorn, Erin	Hartshorne, Annette	Hartung, Bridgette
Hartwell, David	Hartwell, Dominique	Hartwell, Susanne	Hartwell, Virginia M.	Hartwig SR, Daniel	Harty, Florence
hartz, catrina	Hartzler, Margaret	Harvey, Anne	Harvey, Cyrahn	Harvey, Dawn	harvey, duane
Harvey, Garrilynn	Harvey, Garrilynn	Harvey, Hayley	harvey, jeanie	Harvey, Joe	Harvey, Lacey
Harvey, michelle	Harvey, Moira	Harvey, Pam	Harvey, Richard	harvey, sarah	Harvey, Stephanie
Harvey, Tina	Harville, Av	Harward, Lindsey	Harwell, Andrew	harwood, Ann	Harwood, Robert
Hascall, Janet	haseltine, amber	Hasenau, Carolina	Haseotes, Amy	Hash, Dena	Hashimoto, Kathe
Hashmi, Margaret	hasji, pratiksha	haskell burghart, barbara	Haskell, Eric	Haskell, Michael	Haskin, Margaret
Haskins, Eric	Haskins, Patrick	Haslam, Gerald	haslett, dora	Hassan, zainab	Hasse, Nancy
Hasselbrink, Robert	Hassell, Abner	Hast, Fran	hastie, sandra	Hastings, Michelle	Hastings, Rhonda
Hastings, Sharon	Hastings, Velma	Haswell, Sandra	Hatami, Barbara	Hatch, Gari	Hatch, Heather
Hatcher, Nadine	hatfield, kadynn	Hathaway, Heather	Hathaway, Julia	Hathaway, Megan	Hathaway, Melissa
Hathaway, Susan	hathcock, lisa	Hathwell, Christine	Haton, Kathleen	Hatt, Kathleen	Hatten, Rick
Hatton, Elizabeth	Hatton, Robert	Hattori, Pilar	Hauber, Barclay	Hauck, Barbara	Hauck, Barbara
Hauck, Joanne	Hauck, Michael	Hauck, Molly	Hauer, Emily	Hauer, Nancy	Hauge, Erik
Haugen, Bob	Haugen, David	Hauger, Kat	Haugh, Cheryl	Haugh, Erin	Haughey, Marie
Haught, Pamela	Haun, Pamela	Haupt, Alicia	Haupt, Carolyn	Hauptfuehrer, Kristina	Hauser, Deborah
Hausman, Kara	Hausserman, Nancy	Hauswald, Christina	Haut, Lisa	Hauter, Michele	Havassy, Nancy
Havel, Timothy	havens, heather	Havens, Sheri	Haver, Janet	Haver, Lynda	Haverfield, Heather
haverkamp, kathy	Havlik, Hugh	hawes, brooke	Hawes, Delores	Hawes, Frank	Hawes, Michael
Hawk, Lisa	Hawk, Rachael	Hawkins, Attorney at Law, Laura Tracy	Hawkins, Carole	Hawkins, Cindy	hawkins, julia
Hawkins, Keith	Hawkins, Kim	hawkins, marjorieann	Hawkins, Myra	Hawkins, Patricia	Hawkins, Paula
Hawkins, Ruthanna	Hawkins, Teresa	Hawks, Betty	Hawley, Deborah	Haworth, Jayne	Hawthorn, Pat
Hawthorne, Randy	Hay, Carol	Hay, Gavin	Hay, John	Hay, Tina	Hay, William
Hayashi, Jt	Hayashi, Koji	hayden, gary	Hayden, Nancy	hayden, sandra	Hayden, Sherry
hayden, tony	Hayder, Rhonda	Hayes Wine Miller, Kimberly	Hayes, Alexa	Hayes, Bob	Hayes, Carol
HAYES, CAROLYN	Hayes, Cathleen	hayes, chad	Hayes, Christine	Hayes, Donna	Hayes, Greta
Hayes, Heather	Hayes, Helen	Hayes, Jason	hayes, Kristy	Hayes, Marie	Hayes, Mary
Hayes, Maureen	hAYES, pAMELA	Hayes, Phyllis	Hayes, Rhonda	Hayes, Ryan	Hayes, Sharon
Hayes, Tim	Hayes, Wanda	hayes-budgen, shawndra	Hayne, Janice	Haynes, Bruce	Haynes, Dwight
Haynes, Janice	Haynes, John	Haynes, Taryn	Hays, Helen Logan	Hays, P.S.	Hayward, Michelle
Hayward, Michelle	HAYWOOD, CHARLES	Hayworth, Amy	haz, siss	Hazard, Donna	hazard, monic
Hazelmyer, Elizabeth	Hazelton, Judith	Hazelton, judith	Hazelton, Kyra	Hazelwood, Jerry	hazen, ann
Hazen, Joe	Hazynski, Chris	Head, John	Head, Lavon	Head, Susan	Headley, Linda
Heagy-Len, Linda	HEALEY, KATHRYN	Healey, Martha	Healey, Mary	Healey, NancyGrace	Healy, Carol
Healy, Kristen	Healy, Patricia	Heaning, Richard & Eileen	Heaps, Jean	hEARFIELD, hELEN	Hearne, Abby
Hearne, Ray	Heater, Sherry	Heath, Frances	Heath, Karen	Heath, Linda A.	Heath, Tom
heatherly, debbi	Heaton, William	Heatwole, Jeff	heavyrunner, mia	Hebb, Jeffrey	Hebberger, Jo Anna
hebert, jeff	hebinger, guilan	Heck, Nancy	Hecker, Elizabeth	Heckler, John	Heckman, H

Heckman, Meagan	Hedal, Melissa	hedden jr., stanley	Hedden, David	hedegaard, maibritt	Hedge, Belinda
Hedgecock, Pamela	Hedges, Chris	Hediger, JoAnn	Hedio, Linda	Hedio, Linda	Hedley, Diane
Hedrick, Twyla	Hedstrom, Cathy	hedstrom, dwayne	Hedt, Michael	heeg, siggi	hees, genine
Heffelfinger, Reed	Heffernan, Kathy	Heffington, Braylon	Heffran, Brad	Heflin Shakya, Ulrike	Hegemeyer, Michael
Hegenscheidt, Petra	Hehle, Jennifer	Hehn, Paul	Hehre, Kathy	Heicher, Amy	Heidbrink, Liliana
Heide, Andra	Heide, Kerstin	Heidelberg, Shawana	Heidelmeier, Sarah	Heideman, Judith	Heideman, Susanna
Heidemann, Lynette	Heidenfelder, Randy	Heidenreich, Ralph L	Heigl, John	Heiks, Krisitna	Heiland, William
Heiler, Todd	Heiling, Joanna	Heilman, Barbara	Heiman, Jeremy	Hein, Claudia	Hein, Laurie
Heinig, Maren	Heinly, Bridgett	Heino, Ruth	Heinrich, David	Heinrich, Julie	Heinrich, Stephanie
Heinrichs, Kathy	Heins, Suzanne	Heinsler, Theresa	Heintx, Nancy	Heintz, Penny	Heinz, Emmaleah
Heinz, Jenny	Heiser, Barbara	Heisey, Sandra	Heisler, Susan	Heithaus, Melissa	Heitzmann, Brandon
Helak, John	Helaudais, L	Held, John	Held-Warmkessel, Jeanne	Helen, Jennifer	Helen, Wenxin
Heler, Juanita	Helfrich, Grace	Helgesen Hass, Rebekka	Helgesen, Barbara	Helgren, Michelle	Hellenthal, Leslie
Heller, Elizabeth	Heller, Eugene	Heller, James	Heller, Janet	Heller, Lorraine	hellerud, theodore
Hellewell, Tacey	Hellman, Thomas	Helmbright, Deana	Helmer, Kathleen	Helmeste, Michael	helms, judy
heloskie, paul	Helton, Leea	Helvey, Elizabeth	Helzer, Jacqueline	Hemenez, Jeffrey	Hemenez, Jeffrey
Hemenway, Matthew	Heminger, Ruth	Hemingway, Andrea	Hemker, Sharon	Hemm, James	Hemmer, John
hempel, drew	Hempey, Patricia	Hendel, Madelon	Hendershot, John	hendershot, tamara	Henderson, Ceacy
Henderson, David	Henderson, Gary	Henderson, J. Michael "Mike"	Henderson, Jeff	Henderson, Joann	Henderson, Kevin
Henderson, Lee	Henderson, Linda	henderson, lynn	Henderson, Maria	Henderson, Marlo	Henderson, Melinda
Henderson, Michael	Henderson, Myranda	Henderson, Nadine	henderson, rachelle	Henderson, Scott	Henderson, Sherry
Hendler, Carol	Hendrey, Elisa	Hendrick, Christine	Hendrick, Gina	Hendricks, Celia	hendricks, gary
Hendricks, Richard	Hendrickson, Alec	Hendrickson, Linda	hendrickson, michael	Hendrickson, Rachel	Hendrickson, Sandy
hendrix, jennifer	Hendry, Dawn	Hendry, Valerie	Hene, Sonya	Heneveld, Cheryl	Henggeler, Carla
Hengst, Grace	Heniff, Don	henkle, paul	Henley, Charlene	Henley, Pamela	Henley, Sadie
Henne, William	Henneberg, Alice	Henneberry, Tom	Henneman, Chip	Hennes, Shari	hennessey, john
Hennessey, Patricia	Hennie, CLAUDE	Henning, Brian	Henning, Nancy	Henninger, Maryann	Henriksen, Deb
Henriksen, James	Henriques, Charmaine	Henriques, Claudio	Henriques, Heloisa	henrotay, alain	Henry, Anita
Henry, Anne	Henry, Brad	Henry, Claire	Henry, Devin	Henry, Donna	Henry, J A
Henry, Janet	henry, jeremy	Henry, Katryne	Henry, Kristina	Henry, Michelle	Henry, Patricia
henry, rose	Henry, Terri	Henry, THELMA	Henry-Starling, Kristal	Henschen, Shirley	Henselmann, Evangeline
Henshaw, Brent	Hensley, Charles	Hensley, Laura	Hensley, Sandra	Hensley, Teresa	Henson, Bernice
Henson, Jessica	Henson, Joey	Henson, Julia	Henson, Lana	Henson, Valorie	hentges, Bianca
Henthorn, Penelope	Henze, Janet	Hepbum, Robert	Hepburn, Isabel	Her, Denisse	herandez, helena
Herbeck, Desiree	Herbelin, Margaret	Herbener, Rachel	Herberg, John	Herbert, Emily	Herbert, Patricia
Herbert, Wendy	Herbruck, Janet	Herbst, Tori	herbst, william	Heredia, Amber	Hergenrader, Siara
Herger, Loretta	herl, sandra	Herlihy, Norm	Herlinger, Nancy	Herman, Bill	Herman, Jack
Herman, John	Herman, Nicholas	herman, ralph	Hermance, Thomas	Hermann, Birgit	Hermann, Birgit
Hermanns, David	Hermansen, Stacy	hermelink, lyn	Hermes, Kristi	hermida, Daniela	Hernandez, Alexa
Hernandez, Carrie	hernandez, chris	Hernandez, Eloy	Hernandez, Ezequiel	Hernandez, Guillermo	Hernandez, J
Hernandez, Jacqueline	Hernandez, Jenessa	Hernandez, Jessica	Hernandez, Joanna	Hernandez, Jose	hernandez, Judy
Hernandez, Laticia	Hernandez, Lenney	Hernandez, Maria L.	Hernandez, Melinda	Hernandez, Melvin	Hernandez, Nannette
Hernandez, Ricardo	Hernandez, Ruben	Hernández, Silvia	Hernandez, Sonia	Hernandez, Soveira	Hernandez, Taina
Hernandez, Viola	Herndobler, Beth	Hern&#65533;ndez Navarro, Antonio Jes&#65533;s	Herod, James	Herold, Ana	Herold, Katherine
heron, ariel	Heron, Ellen	heron, joan	Heron, Veronica	herpoel, nadia	Herr, Charlotte
Herr, Michael	Herrera, Bill	Herrera, Desiree	Herrera, Isabelle	Herrera, Jesus	Herrera, Kathleen

Herrera, Mauricio	Herrera, Pamela	Herrera, Vanessa	Herrera-Duran, Pat	Herrero, Ana	Herrick, Claire
herrick, cynthia	Herrick, Taylor	Herrill, Candace	herring, john	Herring, Kathleen	Herring, Patti
Herring, Peter	Herring, Rhonda	Herrington, George	Herrington, Heather	Herrmann, Dorene	Herrmann, Jody
Herrold, Linda	Herron, Jane	Hersch, Steve	Herschlag, Jane	Hershbain, Charlene	Hershey, Ann
Herten, Margaret	Hertenstwin, Rhonda	Herter, James	Herther, James	Hertz, Susan	Hervault, David
Herwig, Gary	Herz, Dayna	Herz, Randy	Herzberg, William	Herzinger, Glenn	Herzog, Meredith
herzog, nancy	Herzog, Tina	Heslet, Elizabeth	Hess, Bill	Hess, Dani	Hess, Evelyn
Hess, Hurd	Hess, John	Hess, Marina	Heß, Nancy	Hess, Rebecca	Hesse, Carola
Hesse, Carole	Hesselink, Joanne	Hesselman Turner, Nancy	Hession, Vanya	Hester, Dionne	Hester, Robin
Hester-Welch, Vicki	Hestnes, Elizabeth	Heston, Christine	Hetherman, Darienne	hetlage, john	Hetrick, Mary
hetrick, pattie	Hettell, Carolyn	Heugas, Jeremiah	Heugh, Jeanne	Heuman, Chris	Heuze, Diana
Hevenor, Kathleen	Hever, Cynthia	Hewelt, Karen	Hewins, Richelle	Hewitt, Carol	Hewitt, Chris
Hewitt, holly	Hewitt, Judy	Hewitt, Sandy	Hewitt, Sheri	Hewson, Pat	Hewson, Sara
hewston, leah	Hey, Jill	HEY, LISA	Heydon, Margaret	Heydt, Joan	Heyer Coyne, Ellis
Heyer, Gail	Heyman, Teri	Heymann, Gary	Heymans, Mariana	Heyn, Joyce	Heyneman, Amy
Heyneman, John	Heythaler, E.	Hiatt, J.M.	hiatt, johnna	Hiatt, Richard	Hibbard, Ed
Hibshman, Steve	Hickey, P	Hickey, Rebecca	Hickey, Suzanne	Hickey-Wilson, Elsie	Hicklin, Mary
Hickman, Belle	Hickman, James	Hickox, Ann	Hicks, Andrea	Hicks, Connie	Hicks, Dan
Hicks, David	Hicks, Diane	Hicks, Janet	Hicks, Jerry	Hicks, Margaret	Hicks, Marylee
Hicks, Robert	hicks, Stephanie	Hicks, Tracey	Hidalgo, Charlene	Hidalgo, Orlando	Hiddle, James
Hieb, Laurel	Hieber Jr., L.D.	Hieber, Richard	Hiemann, Gabi	Hierl-Schulze, Heidi	Hiers, Richard
Hiestand, Kathryn	Hiestand, Nancy	Higdon, Laura	Higdon, Maxxcell	Higginbotham, Britta	Higginbotham, Laura
Higgins, Amie	Higgins, Andrea	Higgins, Callie	Higgins, Dennis	Higgins, Emily	Higgins, Francis
Higgins, Jeffrey	Higgins, Sherry	Higgs, Brad	Highfill, Debra	Highley, Kristy	Hight, Mary Ann
Hightower, Christine	Higley, Bonnie	Hila, John	Hilbelink, Lisa	Hilbert, Pamela	Hilbert6, Darlene
Hilbring, William	hilbun, robert	Hildebrand, Ana	Hildebrand, Valerie	Hildebrandt, Jamie	Hildebrandt, Todd
Hildenbrand, Pamela	Hildenbrandt, Frank	Hildreth, Evi	hile, amy	Hileman, Victoria	Hilf, Linda
Hilgartner, Tom	Hilkovitch, Nicole	Hill, A	Hill, Angela	Hill, B	Hill, Corey
Hill, Cyndi	Hill, Cynthia	Hill, David	Hill, Dawn	Hill, Dean	Hill, Debra
hill, Elaine	Hill, Emi	Hill, Frank	hill, geri	Hill, Ginger	Hill, Ginger
Hill, Harriet	Hill, Jamie	Hill, Jennifer	Hill, Jim	Hill, Kay	Hill, Lisa
Hill, Mary	Hill, Michael	HIll, Moni	Hill, Nastassia	hill, oliver	Hill, Paulette
Hill, Roz	Hill, Samantha	Hill, Sheri	Hill, Susan	Hill, Tamara	Hill, Tasha
Hill, Teresa	Hill, Teresa	Hill, Thomas	Hilland, Ruthann	Hillen, Melissa	Hiller, Lee Anne
Hillerman, Catherine	Hilliard, Eddiy	hilliard, kathleen	Hilliard, Patricia	Hilliker, Mark	hillman, carol
Hillman, Linda	hillman, patricia	Hills, Barbara	Hills, Brijane	Hills, Laurel	Hills, Nancy
Hills, Sally	Hillson, Miriam	Hillstrom, Kacie	Hillstrom, Kristen	Hilmarsdottir, Tinna	Hilson, Rhonda
hilt, kathy	Hiltebeitel, Lauren	Hilton, Daniel	Hilton, J	Himes, Erica	Himes, Shannon
himmelman, carol	Himmelright, Christy	Himsl, Rebecca	Hinckley, Alissa	Hind, David	Hindman, Brien
Hindman, Daniela	Hinds, E	hinds, katja	Hiner, Ann	Hines, Barbara	Hines, Brenda
Hines, Carol	Hines, d	Hines, Michael	Hines, Nancy	Hines, Nancy	Hines, Norman
hines, Shelby	Hines, Sue	Hines, Tom J.	hines, whitney	Hinkle, Colette	Hinkle, Phil
Hinkson, William Harold II	Hinman-Sweeney, Elaine	Hinn, Lois Anne	Hinneberg, Beth	Hinojos, Pilar	Hinojosa, Adrie
hinojosa, sherry	Hinoki, George	Hinrichsen, Claudia	Hinsberger, Wendy	Hinson, Crystal	Hinson, Diana
Hinson, Doris	Hinton, Jennifer	Hinton, Karla	Hinze, Willie	Hipszky, Ginger	hipworth, d
Hirano, Arleen	Hiraoka, Mario	Hirsch, Andrea	hirsch, gerry	Hirsch, Harriet	Hirsch, Matthew
Hirsch, Robin	Hirschhorn, Janet	Hirschhorn, Marsha	Hirshik, Eric	Hirt, Barbara	Hirt, Deb
Hirtzel, Chelsea	Hiscock, Alice	hise, diane	Hise, Sandra	Hiss, Joseph	Hitchcock, Salima
Hitchcock, Sheila	HITE, LEEANN	Hite, Sharon	Hites-Clabaugh, Lucinda	Hiteshew, Eleanor	Hittle, Mike
Hitzler, Ted	Hixon, Sharon	Hixson, Tara	Hixson, Taylor	Hjelm, Lauren	Hjort, Richard
HLAT, MIKE	Hlodnicki, Bruce	Hlushtchyk, Christine	Hlushtchyk, Christine	HMIRAK, bill	Ho, Ivy
Hoagland, Dona	Hoagland, Lee	Hoagland, Linda	Hoaglin, Dianne	Hobbs, Kathleen	Hobmeier, Theresa

hobson, kelvin	Hocevar, Renee	Hoch, Lisa	Hochberg, Charles	Hock, Paula	Hockins, Russell
hockley, jim	Hodapp, Natalie	Hodes, Carey	Hodge, Jenna	Hodge, Patrick	Hodges, Carlyle
Hodges, Connie	Hodges, Kara	Hodges, Lisa	Hodges, Scherry	hodgin, emily	Hodgin, Richard
Hodgin, Terry	Hodgson, AnnMarie	Hodorowich, Rick	Hodovan, Francine	Hodson, Sally	Hoeborn, Joan
Hoeffel, Gwendolyn	Hoeffner, Noelle	Hoelbling, Walter	Hoenig, Irwin	Hoenig, Susan	Hoeniger, F
Hoenle, Terry	Hoepli, Marianne	Hoepner, Dorothea	Hoess, Joseph	hof, annette	Hofberg, Eva
Hoff, Ann Marie	Hoff, Ardie	Hoff, Beverly	Hoff, Kellie	Hoff, Marilyn	Hoff, Marsha
Hoffecker, Barbara	Hoffman, Andrew	Hoffman, Ashley	Hoffman, Barbara	Hoffman, Bernadette	Hoffman, Caisey
hoffman, Jerome	Hoffman, Jessica	Hoffman, Laurie	Hoffman, Leonard	Hoffman, Lindsey	Hoffman, Lysa
Hoffman, Michele	Hoffman, Nancy	Hoffman, Norman	Hoffman, Rebecca	Hoffman, Scott	hoffman, steven
Hoffman, Sue	Hoffmann, Deborah	Hoffmaster, Danna	Hofmann, Dennis	Hofmann, Donna	Hofmann, Giorgio
Hogan, Blithe	hogan, brian	Hogan, Eugene	Hogan, Herbert	Hogan, Judith	Hogan, Karen
Hogan, Kay	Hogan, Michael	Hogan, Patrick	Hogan, Randolph	Hogan, Raymond	hogan, robert
hogan, starr	Hogen, Sydni	Hogle, Linda	Hoglind, Judith	Hohenshelt, Felicity	Hohl, Susan
hoin, brigitte	Hoisington, Marcia	Hoitink, Matthew	Hojda, Debora	Hok, Pisey	Hokanson, Jerry
Holbrook, Sandra	Holbrook, Sarah	Holbrook, Sonja	Holcmannova, Dita	Holcomb, Ben	Holcomb, Peter
Holcomb, Tanya	Holcombe, Cassie	Holcombe, Marjorie	Holden, Chuck	Holden, Douglas	Holden, Jodi
Holden, Mary	holden, rebecca	Holden, Stephen	Holden, Tammy	Holder, Chris	Holder, Martha
Holder, Samm	Holder, Tori	Holder, William	holderith, erika	Holford, Sharon	holger, dirk
Holguin, Irene	Holifield, Lucy	Holkup, Janice	Hollaar, Audrey	hollack, janet	Holladay, Ashley
Hollahan, James	Holland, David	Holland, Gyl	Holland, Jennifer	Holland, Jo Ann	Holland, Lovice
Holland, Mervin	Holland, Nancy	Hollander, Marilyn	Hollar, Melody	Hollembeak, Demaris	Hollenbaugh, Linda
Hollenbeck, Donald	Hollenberg, Dennis	Hollenhorst, Sarah	Holler, Stephen	Hollerbach, R.	Holley, Celestine
Holley, J.	Holley, Thomas	Holliday, Carolyn	Holliday, Phyllis	Holliday, Sheila	Holliday, Sheila
Holliday, T	Holliday, Virginia	Hollie, Paula	Hollinger, Amber	Hollingsworth, Margaret	Hollington, Jason
Hollinrake, Mark	hollinrake, mark	hollins, ed	Hollis, Lisa	Hollis-Franklyn, C.C.	hollister, david
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holm, sam	Holm, Samantha	Holman, James L.	Holman, Jennifer	Holman, Karen	Holman, Robert
Holman, Victoria	Holmberg, Edwin	Holmes, Angela	holmes, ayanna	Holmes, Barb	Holmes, Brad
holmes, candy	Holmes, Heather	Holmes, Howard	holmes, josh	Holmes, Keyosha	Holmes, Kyle
Holmes, L.M.	Holmes, Matthew	holmes, michell	Holmes, Paula	Holmes, Susan	Holmes, Syndi
holmgren, jean	Holmstrom, Christine	Holstein, Amelia	Holstein, Glen	Holt, Amy	Holt, Cheryl
Holt, Debi	Holt, Gwen	Holt, Mary	Holt, Melinda	Holt, Randi	Holt, Rhonda
Holtam, Jordan	Holthaus, Tracy	Holton, Peggy	Holtsclaw, Darlene	Holtz, Barbara	Holtzhausen, Chris
Holtzin, Richard	Holub, Wendy	Holzer, Rebecca	Holznagel, Keith	Homan, Kathleen	Homan, Leslie
Homer, Deanna	Homoya, Barbara	Hom-Roan, Victoria	Homza, Laura	Hon, Don	Hon, Sherry
Honan, Mair	Honeck, Chris	Honeychuck, Nancy A.R.	Hong, Celeste	Honigsblum, Alexander	Honish, Robert
Honka-koivunen, Emily	Honles, Janelle	Hood, Leigh	Hood, Nick	Hood, Sayo	Hood, Shelby
hood, vicki	Hoodwin, Marcia	Hoofnagle, Wendy	Hook, Sierra	Hook, Tim	Hooker, Bp. Thomas
Hooker, Charles	Hoole, Alice	Hooley, Deb	Hooper, Julie	Hooper, Maureen	Hooper, Tom
Hooper, Wayne	Hoose, Terry	Hooson, Clare	Hoots, James	Hoots, James	Hoots, Suzanne
Hoover, Faith	Hoover, Josie	Hoover, Lorna	Hoover, Mary	hoover, nm	Hoover, Rheanna
Hoover, Thomas	Hope, Anna	Hope, Holly	Hope, Phillip	hope, stephanie	Hopewell, Ricky
hopewell, sara	Hopke, Maryrose	Hopkins, Alexandra	Hopkins, Alyssa	HOPKINS, CAROL	Hopkins, James
hopkins, jeff	Hopkins, Melissa	Hopkins, Natasha	Hopkins, Rima	Hopkins, Ruth	Hopkins, Sarah
Hopkins, Tom	Hopkins, Tracey	Hopkinson, Anastasia	Hopkinson, Norris	Hopkinson, Patty	Hopler, Russ
Hoppe, Casey	HOPPE, JUDY	Hoppe, Susan	Hoppenbrouwers, Bart	Hoppenbrouwers, Elke	hopper, jamie
Hopper, Joe	Hopper, Josh	Hopper, Kitty	Hopper, Larry	Hopping, MaryAnn	Hopson, Diana
Hopwood, Sandra	Hopwood, Timothy	Horan, Julie	Hore, BOYD	Horenstein, Michele	Horlick, Susan
Horn, Beth	Horn, Janice	Horn, Jonathan	Horn, Nathana	horn, pamela	horn, suzanne
Hornbuckle, Nicole	Horne, Gail	Horne, Paul	horne, rick	Hornsby, Janet	Horowitz, Christine
Horowitz, Janie	horowitz, Judy	Horowitz, Laura	Horowitz, Megan	Horowitz, Tina	Horrillo, Karen
Horrison, Louann	Horseman, Thomas	Horsman, Daniela	Horst, Karla	Horstman, Sonja	Horter, P

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Horton, Robert	Horton, Sandra	Horton, Sharon	Horvath, Elizabeth	Horvath/Leonhardt, Carolyn/Tom	Horwitz, Martin
Horwitz, Olia	Hosein, Sacha	Hosford, Debra	Hosmer, Dianne	Hossain, Tanzir	Hostetler, Sheri
Hotard, Catherine	Hotch, Marthanne	Hottenstein, Tara	Hottenstein, Tara	Hottinger, Jodie	Houchins, Tiffany
Houck, Cherry	Houck, Cheryl	Houck, Faith	Houck, Holiday	Houck, Tracy	Houdashelt, Mark
Houge, Linda	Hough, Barbara	Hough, Charles	Hough, Laura	Hougham, Tom	HOUGHTALING, LEONARD
Houle, Helene	Houle, Susan	Houlton, David	hourcade, melissa	House, Benjamin	House, Darrell
House, Jennifer	house, lori	House, Michael	Houseman, Kayla	Houser, Brian	Houser, Judy
Houser, Osalyn	Houston, Meghan	Houston, Sue	Houtz, Marcia	hovanec, stephanie	Hovekamp, Larry
Hoven, Debra	Hovey, Roseanne	Hovis, Bart	Hovorka, Annette	How, Joan	Howard, Alice
Howard, Amy	Howard, Barbara	Howard, Barbara	Howard, Cindy	Howard, Claude	Howard, Claudia
Howard, Erin	Howard, Franklin	Howard, Gloria	Howard, Jessica	Howard, Judith	Howard, K
Howard, Karen	Howard, Kristen	Howard, Lucy	Howard, Lynn	Howard, Mark	Howard, Melodie
howard, michial	Howard, Nancy	Howard, Rey	Howard, Robert	Howard, Rubi	howard, sandy
Howard, Sherry	Howard, sonja	howard, sonya	howard, sully	Howard, Tiffany	howard, tim
Howard, Toni	Howarx, Cary	Howe, Arthur	Howe, Darren	howe, Darren	Howe, Marie
Howe, Michele	howell, alicia	Howell, Carol	HOWELL, CYNTHIA	Howell, Dale	Howell, David
Howell, Heidi	Howell, Julia	Howell, Linda	Howell, Lori	Howell, Nadia	Howell, Pamela
Howell, Patricia	Howell, Susan	Howes, Abigail	Howie, Linda	Howie, may	Howk, Dannille
Howlett, Ariel	Hoxha, Leo	hoy, patrick	Hoyes, Angela	Hoyle, Emily	Hoyle, Lester and Judy
Hoyt, Alleyne	Hoyt, Katherine	Hoyt, Patricia	Hraima, Hassna	Hrebin, John	Hrenko, Karl
Hric, John	Hristov, Vik	Hristova, Angelina	Hru, Asmodeus	Hrubý, Petr	Hruska, Amy
Hruska, Theresa	Hsia, yujen	Huang, Hans	Huang, Karissa	Hubacek, Richard	Hubbard, Ann
Hubbard, Daniel	hubbard, eric	Hubbard, Linda	hubbard, merle	hubbard, nicole	Hubbard, Robin
Hubbard, Scott	Hubberd, Mike	Hubbs, gail	Hube, Eva Marie	Huber, Arlene	Huber, C
Huber, Carina	Huber, Carol	Huber, Diane	Huber, Linda	Huber, Tara	Huber, Virginia
Huber, Wayne	Huberman, Anne	huberman, ben	huckaby, Maria	Huckaby, Shawn	Huckins, Harald
Huddleston, Charles	Huddleston, Molly	Huddlestone, Laura	Huddy, Paul	hudgens, angela	Hudlow, Sister Roberta
Hudson, Brian	Hudson, Dianne	Hudson, Harry	Hudson, Jazmine	Hudson, Jon Barlow	Hudson, Joshua
Hudson, Kathryn	Hudson, Marcella	Hudson, Michelle	hudson, tasha	Hudson, Veronika	Hudspeth, William
Huebner, Jennie	huebner, melissa	Huebner, Ron	Huehner, Garrett	Huelsbeck, Johanna	Huelster, Thomas
huempfner, milo	Huennerkopf, Tammy	Huerta, Emmanuel	huerta, rueann	Huey, Preston	Huey, Terry
Huff, C. A.	Huff, Kimberly	Huff, Mr & Mrs Richard N.	huff, Tammy	Huff, TeriLee	Huff, W.T.
Huffman, Cheyenne	Huffman, James	Huffman, Melody	Huffman, Robin	huffman, wendi	Huffman-Kerr, Ross
Hufford, Mary	Huffsmith, Jennifer	Hufker, Rosemary	Huftalen, Matthew	Huggins, Nell	Hughes, Angie
Hughes, Avril	Hughes, Barbara	hughes, Brita	Hughes, Cheryl	Hughes, Curtis	HUGHES, DAVID
Hughes, Debbie	Hughes, Don	Hughes, Dwight	Hughes, Elaine	Hughes, Gary	Hughes, Janice
Hughes, John	Hughes, Karen	Hughes, Karl	Hughes, Kathleen	Hughes, Kathryn	Hughes, Kevin
hughes, kim	Hughes, Krissy	Hughes, Laurel	Hughes, Lauren	Hughes, legran	Hughes, Les
Hughes, Les	Hughes, Linda	Hughes, Lisa	Hughes, Patricia	Hughes, Patsy	Hughes, Robert
Hughes, Stephanie	Hughes, Stephanie J.	Hughes, Summer	Hughes, Suzie	Hughes, Vicki	Hughey, Michael
hugness, ray	huh, sophia	Huie, Marcia	Huizenga, Annette	Huk, Maryann	Hulce, Leisha
Hulet, Angie	Huljev, Tasha	Hull, Gary	Hull, Juanita	Hull, Lise	Hull, Pieter
Hull, Ronald	Hull, Sharon	Hull, Sharon	hullander, mary	Hulse, Corey	Hulse, Jennipher
HULSEY, PATRICIA	Hulsman, Paul	Hultengren, Elaine	Hultgreen, Sarah	Hultgren, D	Humbert, Josey
Humble, Joyce	Huml, James	Hummel, Juanita	Hummel, Katy	Hummer, Karita and Paul	Humphrey, Brian
Humphrey, Carol	Humphrey, Coral	humphrey, florence	Humphrey, Jay	Humphrey, Lisa	HUMPHREY, MARY
Humphrey, Nancy	Humphreys, Marla	Humphries, Tanner	Hundley, Caroline	Hundley, Jane	Hundt, Heather
Hundzinski, Kenneth	Hung, Stephanie	Hungerford, Amber	Hungerford, Donna	Hungerford, Rhonda	Hunker, Diane
hunkins, Silvia	Hunt, Cyndi	Hunt, Don	Hunt, Donna	hunt, douglas	Hunt, Greg
Hunt, Jim	Hunt, Le	Hunt, Linda	hunt, linda	Hunt, Nancy	Hunt, Nathan

hunt, obie	hunt, randy	Hunt, Robert	Hunt, Rosemarie	Hunter Jr., Daniel	Hunter, Bill
Hunter, Cassie	Hunter, D	Hunter, Joann	Hunter, John	hunter, john	Hunter, Kerrilee
Hunter, Krista	Hunter, Margaret	Hunter, Michael	Hunter, Robert	Hunter, Rochelle	Hunter, Shelley
Hunter, Sherry	Hunter, Suzanne	Hunter-Welborn, Ann	Huntington, John	Huntington, Laura	Huntley, Vicki
hunt-nickerson, elizabeth	Hunzeker, Sharon	Huolman, Mia	Hupp, Jenene	Hurd, Lynne	Hurd, Sarah
Hurlbut, Elizabeth	Hurlbut, Kelly	Hurley, Berta	Hurley, David	Hurley, Diane	Hurley, Lisa
Hurley, Sharon	Hurmence, Mark	hurst, darcia	Hurst, David M.	Hurst, Dianne	Hurst, George
Hurst, June	Hurst, Leslie	Hurt, Austin	Hurt, Gail	Hurt, Ida	Hurtt, Kimberly
hurtt, sean	Hurwitz, Jeffrey	HUSBAND, PATRICIA	Husbands, Robert	Husbands, Teresa	husby, jason
Husby, Kristen	Huseby, Katie	huseyin, dawn	husfelt, melanie	Husgen, Janet	Husk, Laurel
Huson, Kacie	Hussain, Shahnaz	Hussey, Krystn	Hutchcroft, Frances	Hutchens, Jr, John	Hutchens, KrisTina
Hutcheson, Joan	Hutcheson, Madalena	Hutchin, Kristine	Hutchings, William	Hutchins, Brenda	Hutchins, Kathleen
HUTCHINS, ROSE	Hutchins, sharon	Hutchinson, Denise	Hutchinson, Everett	Hutchinson, Janevette	Hutchinson, Joan
Hutchinson, Julie	Hutchinson, Melissa	Hutchison, Dwight	Hutchison, Margaret	Hutchison, Margaret	Hutchison, Sandra
HUTCHISON, TINA	Hutchsion, Marlene	Huth, William	Hutt, Evelyn	Huttner, Joseph	Hutto, Jim
Hutton, Joan	Hutton, Lori	Huxtable, Johnna	huynh, kellie	Hvoslef, Erik	Hwang, Michelle
hwoschinsky, paul	hyatt, sandra	Hyde, Alice	Hyde, Karen	Hyde, Kathy	HYDE, SUSAN
Hyde, Wade	Hyer, Nicholas	Hyett, Catherine	Hyjek, Margaret	Hylton, Marion	Hylton, Steve
Hyndman, Carol	Hyndman, Donna	Hyra, Alek	hytche, saun	Hyun, Philip	I, A
I, Anna	Iachelli, Frank	Iaconio, Lisa	Iacono, David	IACURTO, HEIDI	Iadarola, Richard
Ianello, Sandra	Ibarra, Arturo	Ibarra, Daniel	Ibarra, Ericka	Ibrahim, Farzana	Ibrahim, Melissa
Ibrahim, Rita	Ibur, Janie	Icardi, Charlotte	Idso, Barbara	Idso, Jeff	Idso, Madison
Idso, Morgan	Iezzoni, Louis	Iglesias de Oliveira, Laura	Igoe, Pauline	Ihm, Sam	Ilaban-Chaikin, Gwen
Ilardi, Virginia	Ilieva, Stefanka	Illes, Lou	ILLG, Gordon	Illiano, Neil	Illsley, Sara
Iltis, Michael	Imam, Bassam	Imamkhodjaeva, Oidinposha	Imbachi, Julian	Imhoff, Debbie	Imhoff, Jim
imig, marion	ImMasche, Sonia	Imwalle, Taylor	Inabinet, Samuel	Incopero, Patricia	Indelicato, Tanita
indira, mercier	Indjich, Rada	Ineichen, Jelene	Inere, Michelle	Infante, Linda	Infante, Marinella
infante, neil	Infante-Lucio, LuzAdriana	Infanti, Gay	ingalls, virginia	ingargiola, solange	Ingenito, Donna
Inghram, Roger	ingle, maggi	Inglis, Adrienne	Inglis, Kari	Ingram, Carole	Ingram, Darlene
Ingram, Debra	Ingram, John	Ingram, Karen	Ingram, Samantha	ingram, sofia	Ingram, Taylor
Ingram, Tom	Ingram, William	inkpin, joan	inmon, parker	Innes, Kim	inscoe, di
Inskeep, Theresa	Intemann, Raymond	Iovino, Teresa	Ipatzi, Wendy	Ippolito, Celia	Ira, Joseph
Irby, Kathryn	irby, tahjee	Ireland, Lynn	Irion, Lynne	Irish, Jim (James H.)	Irizarry, Bogart
Irizarry, mesha	Irizarry, olivette	irons, barbara	Irons, Bridget	Irons, Bridget	Irueste-Montes, Ana
Irvin, Kathleen	Irvin, Linda	Irvin, Yvonne	Irvine, Linda	Irving, Christina	Irving, Jennifer
Irving, Mark	Irwin, Deborah	Irwin, Julie	Irwin, Julie	Irwin, Krista	irwin, sarah
Irwin, Zachary	Isaacs, Allison	Isaacson, Stacey	Iser, Russell	Iseri, Martin	IsGhey, Adyeat
Ishida, Barbara	Ishihara, Joan A.	Ishii-Kiefer, Takako	Ishii-Price, Rika	Ishmael, Virginia	Isidoro, Edith
isildak, ates	Isla, Cynna	Islam, Abdullah	Islas, Ma Luisa	Isley, Niara	Ismail, Hildy
Isom, Barbara	Israel, P Denise	Israil, S	Itule, Norma	Iuro, Margaret	Ivaldi, Miriam Noemi
Ivan, Maura	Ivanov, Elina	Iversen, Sheryl	Iverson, Dehra	Iverson, Karen	Iverson, Marsha
ivery, tyvaughn	Ives, Wendy	Ivey, Marjorie	Ivey, Ryan	Ivy, Joan	Ivz, Jfs
Iwaniec, Robin	Iyer, V	Izzo, Laurie	J, Anna	j, j	J, Pamela
J, Tariana	J.Casa, Louis	Jablonkay, Geza	Jablonowska, Agnieszka	Jablonski, Margaret	Jablonski, Tracy
Jache, Elizabeth	Jachimiak, James	Jack, Lisa	Jack, Susan	Jacklin, Carol	Jackson Aho, Monica
jackson, alicia	Jackson, Anne	Jackson, Antoinette	Jackson, Barbara	Jackson, Barbara	Jackson, Beth
Jackson, Carole	Jackson, Carolyn	Jackson, Catherine	Jackson, crystal	Jackson, David	Jackson, Debra
Jackson, Denise	Jackson, Diane	Jackson, Dorie	Jackson, Dorothy	Jackson, Elizabeth	jackson, james
Jackson, Janet	jackson, jasmine	Jackson, Jeff	Jackson, Jenice	Jackson, Jimalee	Jackson, Julieanne
Jackson, Katherine	Jackson, Kris	Jackson, Lana	jackson, Leslie	Jackson, Maria	Jackson, Marianne
Jackson, Marva	Jackson, Michael	jackson, n	jackson, richard	Jackson, Roseann Leith	Jackson, Rosemary
Jackson, Sally	Jackson, Sandra	Jackson, Sandra	Jackson, Sasha	Jackson, Silvia	Jackson, Syreeta
Jackson, Teresa	Jackson, Timothy	Jackson, Troy	Jackson, Tyshunna	Jackson, Venita	Jackson, Vicki
Jacob, Sheena	Jacob, Su	Jacobel, Richard	Jacobo, Consuelo	Jacobs, Daniel	Jacobs, Dr. Robert

Jacobs, James	Jacobs, Jose C.	Jacobs, Katrina	Jacobs, Linda	Jacobs, Linda	Jacobs, Mark
jacobs, norma	Jacobs, Quida	jacobs, s	Jacobs, Sally	Jacobs, Yvelyne	Jacobsen, Claire
Jacobsen, Kathleen	Jacobson, Alan	Jacobson, Ann	Jacobson, Charlotte	Jacobson, Deborah	Jacobson, Diane
Jacobson, Donald	Jacobson, Jana	Jacobson, Jessica	Jacobson, Lisa	jacobson, lisa	Jacobson, Pam
Jacobson, Tobin	Jacobson, Trina	Jacoby, Barbara	Jacoby, Jill	Jacoby, Ketzia	Jacqueline byard, Jacqueline
Jacques, Ana	Jacques, Karen	Jacques, Sally	Jadach, Linda	Jaeger, Andrew	Jaeger, Cindy
Jaeger, Inga	jaeger, mendee	Jaeger, Nicola	Jaeger, Robert	Jaehning, Jane	jaeschke, sarah
Jaffe, Burton	jafferally, sahara	Jaffke, Donna	Jager, Calvin	jagiello, carol	jagoda, justine
jahnke, kathy	Jahos, Ellen	Jaillet, Susan	Jaimes, Tibisay	JAIN, Rakesh	Jakubanis, Jessica
Jakubowski, Kathy	Jakubzik, Petra	Jakusz, Darlene	jallad, essa	Jamal, Kate	jamerson, jamie
Jamerson, Janet	James, Ann	James, Barb	James, Barbara	James, Beth	James, Brenda
james, chad	James, Elaine	James, Gordon	James, Ilona	James, Jennifer	James, Jimmy
James, Kristine	James, Laura	James, Lorren	James, Meryl	James, Nadine	James, Nancy
James, Paula	James, R dean	James, R dean	James, Rick	James, Stacy	james, SUZE
Jameson, Anne	Jamieson, Carol	Jamieson, Erick	Jamieson, Samantha	Jamison, Lorrie	Jamison, Sarah
Jamison, Vanessa	Janasik, Steven	Jancik, Dianna	Janczuk, Stan	Jandourek, Alexia	Janelle, Anne
Janes, Lola	JANICKI, Diane	Janini, Robert	janke, susan	Jankesh, Jennifer-Lynn	jankowski, marie
Jankowski, Megan	Jannicelli, Barbara	jannicelli, barbara	Jannuzzi, Angelo	janota, jennifer	Janowski, Rebecca
Jansen, Jennifer	Jansen, Luis	Jansky, Marybeth	Janssen, Jennifer	Janssen, Mieke	Janssen, Olaf
Janssens, Célia	Janton, Renee	Janusauskas, Matthew	Janusko, Robert and Donna	Janusonis, Gintas	Japack, Michael
Japhet, Carey	Jaques, Carrolle	Jarallah, Nihad Christian	Jarboe, Jolynn	Jardmark, Ann	Jardon, E
Jarecki, Gloria	JARK, HANNELORE	Jarman, Jennifer	Jarnagin, James	Jarnagin, Willa	Jarratt, Heidi
Jarrell, Gabriela	Jarrell, Jessica	Jarrell, Robin	Jarrell-King, Veronique	Jarrett, Judy	Jarrett, Kelly
Jarrett, Michael	jarrett, sherrie	jarvis, Anita	jarvis, gemma	Jarvis, Marsha	Jarvis, Nicole
JARVIS, TERESA	Jasiewicz, Edward	Jasin, Catherine	Jasion, James	Jasiorkowski, C.K.	Jasiukiewicz, Anna
Jasoni, Marilyn	Jasper, Alan	Jaspers, Gwen	Jasperson, Leslie	jastromb, virginia	JAUCK, EDDIE
Jaudzemis, Thomas	Jauhiainen, Marc	Jaunakais, Maria	Javaherian, Emma	Javinsky, Elizabeth	Javurek, Deborah
Jawahar, Lisa	Jaworowski, Joan	Jaworski, Amy	JAWORSKI, REBECCA	Jaworsky, Connie	Jaxtheimer, Elizabeth
Jay, Brandon	Jay, Katharine	Jay, Pamela	Jayne, Catherine	Jean, Diane	jeannotte, jeff
jeans, Joel	Jearman, Jean	Jebb, Michelle	Jeffers, Jacqueline	Jefferson, Gerald	Jefferson, Henry
Jeffery, Brian	Jeffery, Katheryn	Jeffords, Stephanie	Jeffrey, James	Jeffrey, Jeanne	Jegou, Julien
Jehn, Robert	Jelassi, Emily	Jeleva, Darina	Jelinek, Jennifer	Jellison, Sharon	Jellison, Sharon
Jenema, Jennifer	Jenesse, Kilhea	Jenkins, Alicia	Jenkins, chris	Jenkins, Dallas	Jenkins, Debby
Jenkins, Janet	Jenkins, Jeffrey	Jenkins, Jessica	jenkins, john	Jenkins, Kimberly	Jenkins, Mark
Jenkins, Melanie	Jenkins, R. A.	Jenkins, Robert	Jenkins, Robin	Jenkins, Roxanne	Jenkins, Scott
Jenkins, Sharon	Jenks, Bonnie	Jenks, Bonnie	Jenks, Robert	Jenne, Karen	Jennings, Candace
Jennings, Cheryl	Jennings, Mercedes	Jennings, Scott	Jennnings, Linda	Jenrette, Henrietta	jensen, brett
jensen, catherine	Jensen, Cornelia	Jensen, Deborah	Jensen, Julie	Jensen, Karen	Jensen, Kathryn
Jensen, Kevin	Jensen, Louetta	Jensen, Marie	Jensen, Mary	Jensen, Pamela	Jensen, Peggy
Jensen, Sandy	Jensen, Tracy	Jenson, Frances	Jenson, Timothy	Jenssen, Kevin	jentz, laura
Jeppson, Deborah	Jepson, Jane	Jerden, Scott	Jergens, Jovy	Jergenson, Sharen	Jernquist, Harriet
Jerome, Brenda	Jerome, Paul	Jerro, Bonnie	Jeschke, Herbert	Jeschofnig, Linda	Jessee, Judy
Jessen, Susan	jessler, darynne	Jessup, David	Jester, Bethany	Jester, Jill	Jeter, Elloie
jetseck, bruce	Jett, LAra	Jett, Sue	Jette, Dr. David	Jevne, Lucretia	Jewel, Rosejade
Jewell, Cheryl	Jewell, Judy	Jewett, Heather	JHess-Behrens, Betsy	Jimenez, Carolina	Jimenez, Christina
Jimenez, Claudia	jimenez, evelyn	Jimenez, Jazmine	Jimenez, Susan	Jimenez, Wendy	Jimenez, Yvonne
Jimerson, Judith	Jiml, Carl	Jin, Audrey	Jinks, Wanda	Jio, Pati	Jiranek, Pam
Jirik, Paulissa	Jitreun, S	jnana, tau	Jobling, Catherine	Jochum, Beth	Jocz, Ed
Joel, Taryn	Joffe, Gloria	Jogerst, Joachim Rochus	Johannes, Nola	Johannsen, Mary	Johansen, Christian
johansen, gina	Johanson, Erica	John, Leland	John, Marilyn	John, Vickie	Johns, Andrew
Johns, Bob	Johns, J.	Johns, Kim	Johns, Lydia	Johns, Paul	Johns, Sherri
Johnsen, Harold	Johnsen, Joy	Johns-Goodman, Sarah	Johnson Watson, Reva	johnson, alton	Johnson, Amy

Johnson, Angela	Johnson, Angela	Johnson, Ann	Johnson, Anne	Johnson, Arlisa	Johnson, Ashley
Johnson, Balkis	Johnson, Balkis	Johnson, Barbara	Johnson, Barbara	Johnson, Becky	Johnson, Ben
Johnson, Bernt	Johnson, Beth	Johnson, Beth	Johnson, Bettemae	Johnson, Brenda	Johnson, Brian
Johnson, Calvin	Johnson, Camille	Johnson, Carol	Johnson, Carol	Johnson, Carol	Johnson, Carol
Johnson, Catherine	Johnson, Chad	Johnson, Charlene	Johnson, Cheryl	Johnson, Chrissie	Johnson, Christina
Johnson, Cliff	Johnson, Colleen	Johnson, D.W.	Johnson, Danny	JOHNSON, DAVID	Johnson, David
Johnson, Diana	Johnson, Diane	Johnson, Don	Johnson, Donna	Johnson, Dorothy-Anne	Johnson, Dwight
Johnson, Edwin	Johnson, Elaine	Johnson, Elaine Dorough	Johnson, Eliza	Johnson, Erik	Johnson, Erik
Johnson, G G	Johnson, Glenda	Johnson, Gordon	Johnson, Hannah	Johnson, Heidi	Johnson, Isabella
Johnson, J Ann	Johnson, Jacob	Johnson, James	Johnson, Jane	Johnson, Jason	Johnson, Jeannine
Johnson, Jennifer	Johnson, Jennifer	Johnson, Jessie	Johnson, Jim	Johnson, Joan	johnson, john
Johnson, Jona	Johnson, Joy and Dwayne	Johnson, Judy	Johnson, Judy	Johnson, Julie	Johnson, Karen
Johnson, Karen	johnson, karen	Johnson, Kate	Johnson, Katherine	Johnson, Katherine	Johnson, Kenneth
Johnson, Kent	Johnson, Kim	Johnson, kimberly	Johnson, Kirk	Johnson, Knox	Johnson, Kristin
Johnson, Kristin	Johnson, L	Johnson, Lars	Johnson, Laura	Johnson, Laura	Johnson, Laurie
Johnson, Laurie	Johnson, Lianna	Johnson, Linda	Johnson, Linda	Johnson, Linda	Johnson, Linda
Johnson, Lindsay	Johnson, Lorraine	Johnson, LuAnn	Johnson, Mandy	Johnson, Mara	Johnson, Marcia
Johnson, Margaret	Johnson, Mary	Johnson, Mary Kay	Johnson, Mavis	Johnson, Maya	Johnson, MD,PhD, Candice E.
Johnson, Michael	Johnson, Michael	Johnson, Michael	Johnson, Michele	Johnson, Milene	johnson, miranda
Johnson, Mishelle	Johnson, Morris	Johnson, Natalee	Johnson, Parvin	Johnson, Pat	Johnson, Patrice
Johnson, Patricia	Johnson, Patti	Johnson, Patti	Johnson, Paul	Johnson, Paula	Johnson, Peggy
Johnson, Peter	Johnson, Philip	johnson, rae	Johnson, Randy	Johnson, Reid	johnson, Renee
Johnson, Rhonda	Johnson, Richard	Johnson, Richard	Johnson, Robert	Johnson, Rose M.	Johnson, Roy
Johnson, Ruby	johnson, Sandy	Johnson, Sarah	JOHNSON, SCOTT	Johnson, Shannan	johnson, shelley
Johnson, Sherrill	Johnson, Sirmorian	Johnson, Stefanie	Johnson, Steven	Johnson, sue	Johnson, Susan
johnson, tanya	Johnson, Terry	Johnson, Terry	Johnson, Thomas	Johnson, Tiffany	Johnson, Timber
Johnson, Tracy	Johnson, Tracy	Johnson, Vicki	Johnson, Wayne	Johnson, Wendy Jo	Johnson, Will
Johnson, Wynter	Johnston, Allan	Johnston, Ashlee	Johnston, Brooklyn	johnston, C Susan	Johnston, Cathrynne
johnston, cathy	Johnston, Jean	Johnston, Jeff	Johnston, Kali	Johnston, Michelle	Johnston, Ruth
Johnston, Stuart	Johnston, Virginia	Johnstone, Ryan	Johnston-Walsh, Jessica	Jokerst, Carol	jolin, amber
Jolin, Judy	Jolley, Dee	Jolley, John	Jollief, Christopher	Jolliff, Shirley	Jolliffe, Karen
jolliffe, mark	Jolly, Deanna	Jolly, Margaret	Jolly-Van Bodegraven, Mark	Jomolca, Zaily	Jonaitis, Charles
Jonas, Otmar	Jonassen, Victoria	Jonea, Rickie	Jones, Angie	Jones, Averill	Jones, Avianna
Jones, Barbara	Jones, Betti	Jones, Billy	Jones, Blanche	Jones, Bob	Jones, Charles
Jones, Charles	Jones, Cherie	Jones, Christina	Jones, Christine	Jones, Christine	Jones, Christopher
Jones, Claudette	Jones, Clayton	Jones, Cynthia	Jones, Danny	Jones, Daphne	Jones, David
Jones, Devon	Jones, Donald	JONES, DONNA	Jones, Emma	Jones, Eric	Jones, Feona
Jones, Gary	JONES, GARY	Jones, H	Jones, Ingrid	Jones, jaqi	jones, jen
Jones, John	Jones, John	Jones, Julie	Jones, Julie	Jones, Julie	jones, karyn
Jones, Kathy	Jones, Kelly	Jones, Kelly	Jones, Kelly	Jones, Kenneth	Jones, Kim
jones, kim	Jones, Kimberly	Jones, Krista	Jones, Kristy	Jones, Kyle	Jones, Larry
Jones, Laura	jones, laura	Jones, Laurel	Jones, Leland	Jones, Linda	Jones, Luana
Jones, Majda	jones, mariamma	Jones, Marian	Jones, Marie	Jones, Mariell	Jones, Martha
Jones, Martha	Jones, mary	Jones, Mary	Jones, Mary	Jones, Mary	Jones, Mary
Jones, Melissa	Jones, Melissa	Jones, Michael	Jones, Mike	jones, montie	Jones, Patricia
Jones, Patrick	Jones, Paula	Jones, Peter	Jones, Rachel	Jones, Rachel	Jones, Ralph
Jones, Rebecca	Jones, Richard	Jones, Robert	jones, robin	Jones, Samantha	jones, scott
Jones, Stanleigh	Jones, Stephanie	Jones, Stephanie	Jones, Stephanie	Jones, Sue	Jones, Susan
jones, Susie	Jones, Suzanne	Jones, Sydney	jones, ta t in	Jones, Tamara	Jones, Tanya
Jones, Tara	Jones, Terri	Jones, V and B	Jones, Virginia	Jones-Giampalo, Mary	Jones-Umberger, Stanley
Jones-Wilson, Faustine	Jong, Carol	Jönsson, Anna	Joos, Sandra	jordan, christine	Jordan, Debra
jordan, dolores	Jordan, Don & Nancy	Jordan, George	Jordan, Jo Ann	Jordan, Joseph	Jordan, Joseph
Jordan, Larry	Jordan, Laura	Jordan, Lois	Jordan, Margaret	Jordan, Mark	Jordan, Robert

jordan, sheila	JORDAN, SHELBY	Jordan, Sherri	Jordan, Susan	Jordan, Thayer	Jordanek, Sandra
Jordan-Guzman, Rosa	Jorden, Ginny	Jordi, Oliver	jorgensen, alena	jørgensen, bente	Jorgensen, Charlotte
jorgensen, rebecca	Jorgenson, Jerry	jorgenson, Linda	Jorgenson, Rhodie	Josell, Selma	Joseph, Christina
Joseph, Marnie	Joseph, Pearl	Joseph, Tadrea	Joseph, Vicki	josephmenard, iyanola	Josephs, carol
Josephs, William	Josephy, Jennifer	Joslin, Paul	Joss, Karen	Josselyn, Mary Ellen	JOSSERAND HURE, Isa
Jostad, Troy	jovanovic, marsha	Joy, Chris	Joy, Jennifer	JOY, KRISTA	Joyal, Jessica
Joyce, Gail	Joyce, Karen Joyce	joyce, pat	Joyce, Susan	Joyner, Krysten	Joyner, Phillip
Joynes, Patricia	Jr, Francis	Jr., Robert	Juan, Andrew	Juarez, Billie	Juarez, Edward
Juby, Marion	juc, candace	Judd, David	Judd, Lil	Judd, Schuyler	Judd, Susanne
Judge, Patrick	Judson, Connie	Judy, Angela	Judy, Karol	Juedes, Debra	juen, stephanie
Juillet, Edwina	Jula, Kathleen	JULIAN, ANTHONY	Julian, Judith	Juliani, Rebecca	Jumonville, John
June, Taylor	Junek, Mary	Jung, Anita	Jung, Kin	Jung, Marilou	Jung, Michelle
jungeberg, chuck	Jungers, Carolann	Junghann, Jorg	Juozilaitis, Lynn	Jurczewski, Carol	Jurczweski, Carol
Jurgela, Elena	juric, eileen	Jurkowski, Valerie	JURNEY, YOLANDA	just, lin	Justice, Gregory
Justice, Janis	Justice, Jessica	Justice, Jolaynr	Justice, Kevin	justin, pennie	justine, Ivars
justiniano, catherine	Justus, Rich	Justus-Rusconi, Valerie	K, Ann	K, Anna	K, Cindy
K, E	k, elisabeth	K, F	k, g	K, Hitomi	k, j
k, j	K, Jess	K, Karlie	K, Kathy	k, r	k, Rick
K., Ab.	K., Paula	K.D., Asuna	kabat, ellen	kaci, beth	Kacir, Stephen
Kadela, Kris	Kaden, Joann	Kadera, E	Kadetsky, Barbara	Kadyan, Naresh	Kaedden, Jim
kaegel, melissa	Kaepplinger, Joan	Kagan, David	Kagan, Jo-Ann	Kagan, Lisa	Kahakalau, Nalei
Kahigian, Peter	Kahigian, Peter	Kahkejian, Deborah	Kahl, Kim	Kahle, Judith	Kahle, Shannon
Kahn, Berta	kahn, cynthia	KAHN, FRED	Kahn, Hayley	Kahney, Pauline	Kahrs, Mel Richard
Kahwaji, Karim	kail, julie	kaili, Heidi	Kain, Jennifer	Kaipainen, LLoyd	Kaiser, Fay
Kaiser, Gloria G.	Kaiser, Kathi	Kaiser, Kathleen	Kaiser, Rose Ann	kaiser, Terry	Kakar, Jawad
KAKHNOVICH, KSENIA	kalan, susan	Kalanick, Jessica	Kalbach, Norma	kale, Nivedeeta	Kaleel, Joseph
Kalik, Antal	Kalinoski, Adrielle	Kalinowski, JoAnn	Kalinowski, Mary	Kalinski, Ray	Kalka, Paul
Kalkstein, Karen	Kalland, Gene	Kallenbach, Cheryl	Kallies, Martina	Kalman, Janet	Kalousi, Maria
kaltreider, kurt	kaluza, n	Kaluzny, Stan	Kam, Gina	Kamarer, Richard	kambeitz, ashley
Kamen, Cathy	kamimura, duane	kaminski, karen	Kamler, Cindy	Kamlet, Ken	Kamm, Dorothy
Kamm, Karen	Kammerer, Lacey	Kampa, Jan	Kamunen, Chanel	Kane, Adam	Kane, Brooke
Kane, Caroline	Kane, Jolyne	Kane, Linda	Kane, Lisa	Kane, Michelle	Kane, Victoria
Kaneichi, Phyllis	Kanes, Jessica	Kanna, Ron	Kannan, Ravi	kanouse, kenlyn	Kanouse, Monroe
kanter, doris	Kanter, Louis	Kantola, Barbara	kantor, ruth	kanz, isabelle	Kaohelaulii, Annette
kap, helen	Kapakos, Shelby	Kapcoe, William	kapec, mark	KAPETANAKOS, CHRISTOS	Kaplan, April
Kaplan, Dennis	Kaplan, Jill	Kaplan, Robert	Kaplon, Lesa	Kapoor, Rajat	Kapp, Tyrone
Kapplin, Kris	kaput, Charlene	Kaput, Charlene	Karady, Sandor	Karali, Paris	Karam, Rick
Karandy, Erika	Karas, LIsa	Karas, Shirley/George	Karathanasis, Yvonne	Karavasileiadis, Ethel	Karbs, Patricia
Kardashian, Barin	kardoff, alan	Karges, Bob	Karimi, Ana	Karimkhan Zand, Sophia	Karlen, Birgitta
Karley, Marisa	karlinsey, ravon	Karlsen, Chris	Karlson, Fred	Karlström, Erik	Karn, Rachel
Karns, Gary	karoljeanne, jeanne karol	Karovic, C	Karp, Matthew	Karpach, Michelle	Karpel, Janice
Karpf, Jill	karpilow, tavi	Karr, Joe	Karren, Harold	Karrmann, Dave	Karsh, Joshua
Karsten, Rebrcca	Kart, Katelyn	Kartenbeck, Suzanne	Kartes, Ricki	Kartman, Ruth	Karzen, Eileen
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laine, britt	Laine, Joyce	Laine, Stacey	Laing, David	Laipple, Mitch	Laird, James
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Lake, Ronald	lake, scott	Lako, Robert	Lakota, Darlene	Lakshmi, Deeksha	Lalicata, Sara
Lalk, Kathy	Lallatin, Natalie	Lalumandier, Molly	Lam, Mary	lam, samantha	LaManna, erin
LaMantia, M	Lamar, Robert	LaMariana, Patrice	Lamascus, Kristin	Lamb, Alexandra	Lamb, Cheryl

Lambden, Corinne	Lambe, Jill	Lambeau, Catherine	Lambert, Carol	Lambert, Deborah	Lambert, Ellen
Lambert, Jerome	Lambert, Josefa	lambert, kathryn	Lambert, Kay	Lambert, Kristy	Lambert, Mary
Lambert, Rick	Lambert, Roy	lambert, sue	lamberti, connie	Lambeth, Larry	Lamboy, Edeliz
Lambregtse, Liz	Lamer, Justice	Lamer, Tonya	Lamers, Elizabeth	Lamers, Steven	Lamerton, Cathleen
Lamken, Nola	Lammers, Kenneth	Lamons, Kristina	Lamour, Max	Lampe, Tina	Lampin, Laura
Lampinen, Susan	Lampke, Karen	Lampman, Gary	Lamport, Bobbie	Lamy, Chantal	Lan, K
Lanagan, Pamela	Lancaster, Janice	Lancaster, Richard	Lance, Cindy	Lance, Derek	Land, Candice
Land, Jason	Land, Kelly	land, lisa	Land, Martha	Landau, Douglas	Landau, John
Landau, Lawrence	Landau-Blake, Malvina	Landberg, Ingrid	lande, connie	Landeen, Clint	Lander, Sher
Landers, John	Landers, Rebecka	Landes, Cheryl	Landgrebe, Gary and Seraphina	Landherr, Lawrence	Landi, Dennis
Landis, Dan	Landolfi, William	Landon, Karen	Landon, Lynne	Landowski, Jodi	Landrum, Susan
Landry, CindyCr	Landry, Larry	Landsberg, Yamuna	Landy, Gail	Lane, Charles	Lane, Chris
Lane, Deborah	Lane, Debra	Lane, Francine	Lane, JK	Lane, Julie	Lane, Lama
Lane, Laurel	lane, liam	Lane, Liesl	Lane, Lisa	Lane, Patricia	Lane, Priscilla
Lane, Richard	Lane, Sandra	Lane, Sherry	Laners, Corey	Lanfranchi, LJ	lanfranco, vinessa
Lang, David	lang, eila	Lang, John	Lang, Katarina	Lang, Kelley	Lang, Lynn
Lang, Rachael	Lang, Stacy	Langbein, Lisa	Lange, Dennis	Lange, Jean	lange, kathy
Langelan, M	Langenac, muriel	Langhaeuser, Sigrid	Langham, Laura	Langham, Sheri	langlet, veronique
Langley, Wayne	Langlois, Donna	Langlois, Page	Langmacher, Linda	langmead, greta	Langnford, Sharon
Langstaff, Richard	Langston, Michele	Langum, Remi	Lanham, Jada	Lanham, Michael	Lanier, Audrey
Lanka, Mike	lankford, carl	Lanning, Monica	Lanpher, Lindsey	lansford, ashley	Lansing, Ronald
Lantow, Susan	Lantry, Gavin	Lantz, Bridget	Lantz, Tamara	Lantz, Yvette	Lanz, Jean
Lanz, Shakoo	Lanzetta, Linda	lap, d	lap, fa	Lapapa, Liz	Lape, Sandra
lapellegrina, laurie	Lapham, Eric	lapiere, jade	Lapierre, Doris	LaPierre, Sharri	laplante MD, sharron
laplante MD, sharron	Laplante, Virginia	LaPointe, Drena	LaPointe, Janis	lapointe, jocelyne	Lapointe, Kenneth
LaPointe, Mary	Lapointe, Toni	LaPointe, Vincent	LaPolla, John	LaPorte, Candace	laporte, ferry
Lapp, Patricia	Lappalainen, Jetro	Lappas, Dimitris	Lappin, Leila	Lapsansky, Eileen	Laptas, Katharine
Lara, Dan	Lara, Michele	lara, noe	Lara, Sandra	Laramie, David	Lare, Michelle
Lareau, James	large, carolyn	Large, Kenneth	Larger, Mandy	Largmann, Merrie	Laricos, Cynthia
Larimore, Reid	Larimore, Richard	lario, rocio	LaRive, Jeffrey	Lark, Neil	Larkin, Ann
Larkin, Samuel	Larkins, Lynn	Larkins, Teagan	Larkins-Strawn, Marianne	Larmuseau, Henri	larocca, Janet
Larocca, Sarah	LaRoche, Laurie	Laroche, Rebecca	Larregui, Maritza	Larroque, Carol	Larrow, Lynn
larrowe, stephanie	Larry, Joyce	Larsen, Dana	Larsen, Dorothy	Larsen, Hanne	Larsen, Joyce
Larsen, Kenneth	Larsen, Sandra	Larson, Beth	Larson, Brandon	Larson, Camille	Larson, Curtis
Larson, Ed	Larson, Elizabeth	larson, james	Larson, Janet	Larson, Jayne	Larson, Jeanette
Larson, Jr., R. Dene	Larson, Patricia	LARSON, PEGI	Larson, Susan	LaRue, Erik	LaRue, Hope
larue, jole	LaRusso, Jerry	Lascano, Natacha	lasecki, clare	Lashlwy, Mary	LASKE, MARGARET
Lasker, Frederick	lasker, janine	lasko, erik	Lasko, Marye	Lasko, Vanessa	Laskoskie, Brenda
Lasky, Eleanor	Lasky, Jeanette	Lasorsa, Hannah	Lasorsa, Maria	lassandrello, noreen	Lassberg, Sarah
Last Name, John Cornely	Lastayo, Vito	Laste, Melissa	LaStrapes, Pat	Laszakovits, Laurie Anne	Lateiner, Ulysses
Latham, Amber	Lathem, Alexis	Lathrop, Pvin	Latiker, Mark	Latka Black, Monica	Lato, Bernadette
Latoch, Karolina	Latta, M.D., MBA, George	Lattanzia, Patricia	Lattarulo, Carrie	Lattime, Holly	latty, dennis
Lau, Maude	Lau, Wendy	Laubach, Cindy	Laubach, Karen	Laubach, M.	laube, Susan
Laubert, Jon	Laubscher, Wayne	Lauer, Richard	Lauer, Tracey	Laughlin, Dawn	Laughlin, Liana
Laughlin, Loren	Laughlin, Rhonda	lauletta, frank	Laun, Jane	Laurella, Nubia	laurella, roger
Lauren, Michele	Laurence, Diana	Laurette, Dav	Laurson, Edward & Gail	Lautaro, Gabriel	Lautenschlager, Judith
LAUTH, MONICA	Lautner, Sharon	Lautzenhiser, Laura	Lautzenhiser, Laura	Lauzon, Charlene	Lauzon, Sandra
Lavacca, Ken	Lavallee, Ben	Lavanchy, Jacqueline	LaVaute, Judy	Lavayen, Gustavo	lavelle, k.P.
Lavey, Barbara	lavigne, beverly	lavigne, cassy	lavoice, john	Lavoie, Brennan	Lavris, Peter
Lavy, Fred	Law, Chris	Law, Kimberley	Law, Meya	Law, Patricia	Lawand, Cambria
Lawburgh, Christina	Lawler, Karen	Lawler, Kim	Lawler, Sandy	Lawless, Greg	Lawless, Kathy

Lawless, Laura	Lawn, Michael	Lawrence, Betty	Lawrence, Carol	Lawrence, Claire	Lawrence, Earle
Lawrence, Earnestine	Lawrence, Jessica	Lawrence, Karen	Lawrence, Kate	Lawrence, Kerry-Ann	Lawrence, Lisa
Lawrence, Michelle	Lawrence, Regina	Lawrence, Sandra	Lawrence, Sarah	Lawrence, Tara	Lawrence, Toni
Lawson, Bart	Lawson, Bartley	Lawson, Debi	Lawson, Delmous	Lawson, Ian	Lawson, Judy
Lawson, Karen	Lawson, Ken	Lawson, Koreena	lawson, peggy	Lawson, Randy	Lawson, Tina
Laycock, Steve	Layden, Patricia	Layfield, Shirley	Layman, Dan	Layne, Tara	Layne, Tobey
layton, Jean	Layton, Jennifer	Lazar, Magdolna	lazares, joann	Lazarova-Weng, Yana	Lazarus, Sara
Lazell, James	lazina, Jill	lazio, rochele	LAZOFF, LEONARD	Lazzelle, Tom	Le Fay, Nicole
Le Jouan, Marianne	Le Roi, Linda	Le Voir-Barry, Laura	Le, Jenna	Le, Toan	Le, Van
Leach, Janee	Leahy, Michael	Leamy, Jane	Lear, Kirsten	Learch, Lynn	Learn, Mary
Learn, Noreen	Leary, Deanna	Leary, Joanna	leary, ken	Leary, Polly	Leaskas, Diana
Leasor, Heather	Leath, Jan	leather, Jo	Leather, Rebecca	Leathers, Renee	leatherwood, ashley
Leatherwood, Fran	Leatherwood, Kelli	Leaton, Rachael	Leavell, Janet	Leavitt, Claire	Leavitt, Demetria
LeBarron, Lori	Lebas, Anne marie	Lebbing, Bobbi	LeBeau, Barry	LeBeau, Mary Delle	Lebert, Mary
Lebid, Galina	LeBlanc, Candy	LeBlanc, Candy	Lebo, Harlan	Lebo, Marion	Leboeuf, Christiane
LeboffeTabaku, Antonia	Lebon, Sharon	LeBon, Terry	Lebow, Jeanne	Lebron, Laraine	lebus, john
Leccese, Geralyn	Lechman, Diana	Lechowicz, Elaine	Leckie, Allyson	Leclair, Marie	LeClair, Peg
LeClerc, Denise	Leclerc, Natasha	LeClere, Leslie	LeCuyer, Jessica	Ledbetter, Angela	Ledbetter, Ken & Glenda
Ledden, Dennis	Leddy, Peter	Leddy, Peter	LeDent, Jamie	Lederer, Grace	Lederman, Patricia
Ledesky, Michele	ledesma, katherine	Ledesma, Nadia	Ledesma, Venus	Ledford, Kendall	LeDock, Arthur
LeDoux, pamela	Leduc, Carmen	LEE, ALAN	Lee, Andrea	Lee, Brenda	lee, carol
Lee, Chimey	Lee, Chris	Lee, Christopher	Lee, Claudia	Lee, Cynthia	Lee, Dawn
Lee, E.R.	Lee, Eugenia	Lee, Ginny	Lee, Gregg	Lee, Harriet	lee, jann
Lee, Jean	Lee, Jennifer	Lee, Jinny	Lee, JoAnn	Lee, Judy	Lee, Junko
Lee, Kate	Lee, Kathleen	Lee, Kelly	Lee, Kris	Lee, Kris	Lee, L.
lee, laura	Lee, Lauren	lee, lenore	Lee, Lita	Lee, Michael	lee, michelle
Lee, Nita	Lee, Peter	Lee, Peter	Lee, Richard	Lee, S	Lee, Sue
Lee, Travis	Lee, Wysley	Leech, Timothy	Leeder, Cynthia	Leedom, Leann	Leedy, Joseph
Leehey, Chris	Leek, Bill	Leek, Katherine	LEEPER, HILDE	lees, tammy	Leesekamp, Kristine
Leeson, Mark	leeyim, h	LeFever, Elizabeth	LeFEVRE, Mary	Leff, H.	Leff, Judi
Leff, Michele	Leffel, Jeannine	Lefferts, Tom	Leffman, Harry	Lefko, Gary	Leflore, Elisa
Leflore, Patricia	Lefort, Andrew	Legan, Mike	Legan, Nina	Leganza, Gene	Legge, Leslie
Leggett, Robert	Lego, Victoria	Legoski, Tara	Legzdins, Albert	Lehman, Ann	Lehman, Eric
Lehman, Gwendolyn	Lehman, Jennifer	lehman, mary	Lehman, P	Lehmberg, Judy	Lehnert, Peter
Lehr, Kelley	Lehrke, Sharyn	Leib, Bracha	Leibacher, Celia	Leibenguth, Christina	Leibon, Nicole
Leibowitz, Susan	Leidal, Erik	Leider, Yuvone	Leigh, Joyce	Leigh, L	Leigh, Rachel
Leigh, Steve	Leighton, Iona	Leighton, Jackie	Leighton, Tim	Leihy, Susan	Leiibman, Irene
Leiker, Diane	Lein, Mary	Leines, Lee	leino, marja	Leinonen, Gerald	Leip, Rachel
Leishear, Kelly	Leister, Kathleen	Leister, Tara	Leite-Cortes, Marcella	Leiva, Miranda	Leland, Lora
lelievre, Beatrice	Lelli, Kimberlie	leloup, nathalie	lemay, mitch	Lemay, Nicola	Lembck, Diane
Lemelin, Carl	LeMieux, Dan	Lemieux, Leah	lemieux, louis	Lemieux, Paul	Lemieux, Theo
Leming, Chad	Lemire, Shannon	Lemischak, Joseph	Lemke, Elvera	Lemke, Marie	Lemley, Michelle
Lemlich, Sandra	Lemming, Day	Lemmon, David	Lemmon, Kathleen	Lemnei, Stephanie	Lemoins, Nancy
Lemon, Liz	Lemonnier, Marie J	LeMosy, Kathryn	Lemus, Mirna	Lenahan, Jennifer	Lenahan, Peggy
Lenartz, John	Lenchner, Nicholas	Lenfest, Teri	Lengel, Elizabeth	Lenhart, Donna	lennnon, madonna
lennox, mary	lenox, mary	Lenox-Krug, AJ	Lensner, Emma	Lent, Kelli	Lentine, Amy
Lentini, Antonio	Lentini, Tony	Lentz, Vivian	Lenway, Linda	Lenz, Jessica	Lenz, Michelle
lenz, simone	Lenzen, Patricia A	Lenzmeier, jack	Leon, cheong	Leon, Danielle	Leon, Lisa
Leon, Mary A	Leon, Matea	leonard, alice	Leonard, Cami	Leonard, Cami	Leonard, Caren
Leonard, Joan	Leonard, Leonora	Leonard, Scott	Leonard, Selina	Leonard, Sondra	Leonard, Tanya
leonardy, barbara	Leone, Marilyn	Leone, Mike	leonelli, lorraine	Leonesio, Saturn	Leonetti, Danielle
Leopold, Govinda	Lepikko, Tanja	Lepley, Marie	lepore, lodiza	Lepore, Lodiza	LePow, Cody
Lepper, Rockne	Lepple, Christopher	Leppo, Bob	Lepzelter, Howard	lercara, sharinne	Lerma, Claudio

Lerma, Luis	Lerma, Stella	Lerner, Adele	Lerner, Arthur	Lerner, B.	Lerner, Lorraine
Lerner, Michael	Lero, Rachel	LeRoy, David	Lese, Courtney	Lesem, Ken	Lesinski, Pete
Lesinski, Pete	Leske, Jim	Lesko, Karen	Leslie, Ann	leslie, Inez J	Leslie, J. Allen
Leslie, Jane	lesmond, michelle	Lesoing, Jill	Less, Dave	Lessard, Debra	Lessard, Jennifer
Lessard, Keith	Lessard, Nichole	Lessels, Linda	Lesser, Diane	Lesser, Margo	Lester, Anne
Lester, Joseph	Lester, Lisa	lester, pamela	Leszczynski, M	Letham, Kirsten	Letham, Maryjean
Lethridge, Leslie	Letner, Debbie	Leto, Bogdana	Leto, Florence	Lettieri, Tammy	Lettman, Amy
leva, dana	Levan, Carl	LeVasseur, Doris	LeVay, Kianna	Leven, Marie	Leven, Marie
Levengood, Michael	Leventis, Angela	leverence, susanne	Leverette, Kathy	Leverich, Judge	Leveridge, Lynn Ann
Levering, Edmund	Levermore, Cassandra	levesque, jacquelin	Levesque, Vickie	Leveton, Lajeanne	Levi, Anna-Lina
Levi, Louis	LEVI, LOUIS	Levicke, Jeff	Levie, Debra	Levin, Beth	Levin, David
levin, fran	Levin, Jon	Levin, Mark	Levin, Shaun Marie	Levine, Adam	Levine, Carlisle
Levine, Emma	Levine, Gregg	Levine, Katie	Levine, Rhoda	Levine, Robert	Levine, Sandy
Levingston, Anne	Levinzon, Paulina	leviten, alisha	Leviton, Peggy	Levitt, Lacey	Levitt, Mary
Levitt, Robert	Levitz, Tammi	Levy, B	Levy, David	levy, david	Levy, Janet
Levy, Jay	Levy, Linda	levy, natt	Levy, Sharon	Levy, Stephen	Lewald, Peter
Lewandowski, Katie	Lewandowski, Loren	Lewin, Jerry	lewin, monica	Lewis, Alysann	Lewis, Andrea
Lewis, Andrew	Lewis, Andrew	Lewis, Ashley	Lewis, Beverly Jeanne	Lewis, Brandi	Lewis, Brenda
lewis, byron	Lewis, Catherine	lewis, cyndy	Lewis, Daniele F	Lewis, Darcie	Lewis, Debra
Lewis, Deet	LEWIS, DIANE	Lewis, Dixie	Lewis, Erma	Lewis, Erma	Lewis, Evelyn E
Lewis, Geary	Lewis, Gordon	Lewis, Jan	Lewis, Jeanne	Lewis, Joan	Lewis, Jordan
Lewis, Joyce	Lewis, Katherine	Lewis, Katherine	Lewis, Kathleen	lewis, kathleen	lewis, kathryn
Lewis, Kristin	Lewis, Leslie	Lewis, Lisa	Lewis, Marvin S	Lewis, Nancy	Lewis, Nikki
Lewis, Norman	lewis, o	Lewis, Rhonda	Lewis, Roger	Lewis, Sammi	Lewis, Susan
Lewis, Susan	Lewis, Verlene	Lewis, William	Leyco, Desiree	Leyland, Michele	Leyrer, Bill
leys, wendy	Leyva, Paul	Leyva, Sonya	Lhamo, Jaime	LHEUREAUX, JACQUELINE	Li Calzi, Dorothy
Li, Michelle	Li, Tony	Li, Wendy	Liao, Karen	Libby, Kathy	LIBERT, GEORGE
Liberti, Stefen	libhart, valerie	libman, diane	Libman, Joel	Libson, Aaron	Licata, phyllis
Lichtenberger, Wayne	Lichtenbert, Bob	Lichterman, Don	Lichtman, Leo	Licini, Carol	Lickly, Emily
Liddick, Shawn	Liddle, George	Liddy, Kevin	Lie, Margaret R	liebert, caren	Liedike, Robert
Liedlich, William	Liedtke, Harriet	lien, karen	Lienhard, Pamela	Lieu, Mai	Ligammari, Marci
Light, Judith	Lightbody, Kristen	Lightcap, James	lightfine, frances	Ligorelli, Teresa	Lijoi, Victoria
Likens, Jessica	liley-trant, alexandra	Lilith, Ms.	Liljequist, Eric	Lilla, Kathi	Lilla, Susan
Lillard, Renee	Lilley, Keith & Sharon	Lilley, Sarah	Lilling, Glenda	Lillis, Dawn	Lillow, Linda
Lilly, Janet	lilly, moon	Lillywhite, Harvey	lilyquist, Diana	Lim, Nigel	Lim, Robin
Lima, Christopher	Lima, Deborah	Lima, Pedro	Limbach, John	Limbrick, Kelvin	Limoges, William
LIMONGI, Magali	Limp, Kathleen	Limpert, Dena	Limyao, Amy	Lin, Cecilia	Lin, David
Lin, Sam	lin, stella	Lina, Emily	Linan, darla	linares, amissa	Linarez, Karen
Linberg, dawn	linck, mysti	Lincoln, Deb	Lincoln, Deb	Lincoln, Deb	lincoln, sarah
Lind, Fay	Lind, Werner	Linda, Lauren	Lindabury, Sally	Lindberg, Robert	Lindberg, Sandra
Linden, Steven	Linden, susanne	Lindenheim, Diane	Linder, Amelia	Linder, Nancy	linder, Naomi
Linder, Patty	Linder, Patty	Linder, Tami	Lindewirth, Kari	Lindgren, Ia	lindhen, sakari
Lindley, JAson	Lindley, Kenton	Lindquist, Erin	Lindquist, Ron	Lindsay, Jada	Lindsey, Angela
lindsey, ginny	Lindsey, Janet	Lindsey, Jo	Lindsey, Katherine	Lindsey, Rebecca	Lindsey, Susan
lindstrom, isaac	Lindstrom, Steve	Linehan, Victoria	Lines, Nancy	Linhares, Claudia	linhart, june
Link, Edgar	Link, Laura	Linke, Aaron M	Linker, Michelle	Linkin, Vicki	Linn, Alan
Linn, Bea	Linn, Karen	Linn, Steven	Linsey, Marianne	Linsley, Barbara	Lintner, Lawrence
Linton, Adrian	Linton, Beverly	Linzmeier, Robert	Lionberger, Daniel	Lipa, Charmaine	Lipcsey, Todd
Lipham, Sarah	Lipinski, Anneliese	lipka, Diane	Lipka, Francine	Lipman, Jane	Lipmanson, Patricia
lipon, bev	Lippard, Ina	Lipper, Carol	Lippert, Connie	Lippert, Timothy	Lippiello, John
Lippitt, Calvin	Lippitt, Debra	lippold, earl	Lipps, Teresa	Lipsky, Karen	Liptak, Linda
Lipton, Connie	Lipton, Michael	Lique, Kathleen	Lira, Magdalena	Lira, Stefon	Lisa Hofman, Lisa
Lisca, Andreana	Lisciandro, Arthur	Lisi, Julius	Liska, Karen	liska, richard	Lisnov, Robin
Lisson, Daniel	List, Henrietta	List, Matt	LIST, ZOA	Litchfield, Alicia	Litchfield, Nancy

Lite, Elaine	litkei greene, cathy	Littell-McWilliams, Kara	Littelmann, Thomas	Little Bear, Mike	Little, Brian
little, christina	Little, Dennis	Little, Heather	Little, Ingrid	Little, Meg	Little, Michael
Little, Robyn	Little, Toni	Little, Walli	littlebull, rocheller.	LittleCub, BobbyKat	Littlejohn, Nicholas
Littlejohn, Sharron	Littleton, Wendye	littmoden, priscilla	Litton, Ruth	Litton, Ruth	Litzsinger, Raymond
liu, dr hal	Liu, Stacy	Liu, Sue	lively, kathie	Livengood, Debra	Livengood, Denise
Livermore, Veronica	Livernois, Ted	Livesey-Fassel, Elaine	Livingston, Beth	Livingston, E Michael	Livingston, Tawnee
Lizotte, G.	Ljung, Ynge	Llanquiman, Erasmo	lle beaudour, françoise	llerandi, janet	Llewellyn, James
Llinas, Stephanie	lLITTLE, GARY	Lloyd, Alexa	Lloyd, B	Lloyd, Bob	Lloyd, Geralyn
Lloyd, Irene	Lloyd, Jan	Lloyd, K	Lloyd, Kathy	Lloyd, Mary	Lo, Jennie
Lo, Paul	Loacker, James	Loane, John	Loban, Katherine	Lobascio, Mara	Lobel, Colleen
LoBiondo, Gina	Lobo, Brandon	LOBROT, EDITH	Locher, Lynn	Lochtefeld, Merrily	LoCicero, Robert
Lock, K	Lockbaum, Sheri	Locke, Kerry	LOCKEN, MARLA	Lockett, Jennifer	Lockhart, Jasmine
Lockheart, Ken	Locklear, Alexis	Locklear, Holly	Lockwood, Beth	Lockwood, Kim	Lockwood, Ronald and Mary
Lockwood, Shawn	Lodespoto, Dr. Joseph	Loe, Peggy	Loe, Steve	LOEB, NANCY	Loebel, Kay
loechner, Karen	Loera, Mario	Loeschke, Harald	Loewen, Kandace	Loffeld, Beth	Loffelmann, Brenda
Lofgren, Gary	Loftin, L.	Loftin, Nancy	Loftlin, Edwina	Lofton, Sidney	Loftus, Jolynn
Logan, Corina	LOGAN, LAURIE	logan, maya	Logan, S	logan, t	Logan, Teresa
Loggins, Michael	loghmanpour, sheila	Logsdon, Angel	Logue, Delores	Logwood, Bonnie	Loh, Yan
Lohman, Lenore	Lohmann, Alice	lohnes, mark	Lohr, Krista	lohse, pamela	Lohwasser, Dolph
Loida, Paul	Lois, Tina	Loizides, Melissa	Lokensgard, Amy	Lokey, Cameron	Lolis, Mary
LoMagno, John	Lomax, Isabella	Lomax, Lynn	Lomba, Timothy	lombard, lawrence	Lombard, Richard
Lombard, Ron	Lombard, Tari	Lombardi, Herlinda	Lombardi, Michel	Lombardi, Robert	Lonas, Breanna
Lonas, Mitchell	London, Diane	London, E	London, Janet	Loney, Joan	loney, Sandy
Long, Ada	Long, Amy	Long, Ann	Long, Ann Marie	Long, Belinda	Long, Beverly
Long, Carrie	Long, Christine	Long, DD, Rev. John	Long, Deborah	Long, Grant	Long, Jacquelyn
Long, Kimberly	Long, Kristina	Long, Larisa	Long, Laura	Long, Leland	Long, Loretta
Long, Marilyn	Long, Mary	Long, Melissa	Long, Mike	Long, Ned	Long, Pamela
Long, Ricky	Long, Sharon	Long, Toni	Long, Tonya	Longenbaugh, John	Long-Fainter, Lynda
Longley, Richard	longley, sandra	Longmore, claudia	Longo, Colleen	Longo, Stephanie	Longoria, Bobbie
longoria, gypsy	Longoria, T.	Longshore, Wally	Longsworth, Jon	Longville, Keren	Longyear, Cathy
Longyear, Sharon	Lonsdale, Carol	Lonsinger, Suzanne	Loo, Camille	Lookingbill, Jennifer	Loomis, Carol
Loomis, Gregry	Loomis, Margaret	Loomis, Susanne	Looney, Ernie	Looney, Hannah	Loosen, Charles
Lopata, Joanne	Lopez, a	Lopez, Anaida	Lopez, Armando	Lopez, Arnold	Lopez, Audriann
Lopez, Barbara	Lopez, Catherine M	Lopez, Cathy	Lopez, Christa	lopez, christopher	Lopez, E
Lopez, Iliana	Lopez, Jennie	Lopez, Jennifer	Lopez, Jessica	Lopez, Jessica	Lopez, Julee
Lopez, Kaylie	Lopez, Laurie	Lopez, Letticia	Lopez, Lissette	lopez, lopz	Lopez, Luz
Lopez, Maria	Lopez, Maria Sune	Lopez, Miguel	Lopez, Natalie	lopez, patty	Lopez, Quatra
Lopez, sarah	Lopez, Stephanie	Lopez, Susan	Lopez, Tanya	Lopez, Vanessa	Lopez, Yanell
Lopez, Yolanda	Lopez-Acevedo, Diana	Lopez-Hagan, Nicole	Lopresti, Kathleen	Lopresto, Mark	Loraw, Laine
Lord, Christopher	Lord, Debby	Lord, Jeanine	Lord, Les	Lordi, Jeanine	Lorentzson, Karen
Lorenz Al-Saeed, Aesha	Lorenz, Angie	Lorenz, Bettina	Lorenz, Marina	Lorenz, Ruth	Lorenzo, Cat
lorenzo, dalila	Lorenzo, Jazmin	Lorette, Len	Lorig, Constance	Loring, Lloyd	Lorkiewicz, Candace
Lorsbach, M. Jean	Lorsch, Patricia	Lorton, Andrew	Los, Laura	Losi, Lora	Losk, Kenlynn
Losman, Kristina	Lottman, Christine	lotz, jude	Lou, Linda	Loubere, Stephane	Loucks, Cynthia
Loudon, Patricia	lough, brooke	Loughlin, Terri	Loughran, Kevin	Loughran, Regina	Louie, Vince
Louis, Joanna	louis, Judith	Lounsbury, Lise	Loureiro, Louise	Lourie, Dick	Lourim, Julie
Lovas, Liana	Lovato, Dorothy	Love, Dianna	Love, Gloria	Love, Joel	Love, Katherine
Love, Robert	Love, Sara	Love, Shelley	Love, Skylar	Love, Yvonne	Lovelace, Jaymes
Lovelace, John	Lovelace, Lanelle	Loveless, Brenda	Loveless, Stephanie	Lovell, Darlene	Lovell, Debra
Lovell, Lawrence	Lovell, Patti	Lovell, Sharon	Lovell, Stephanie	Loventhal, john	lover, Animal
Loverso, Lucille	Lovetro, Vicky	Lovett, Dianne	Lovett, Frances	lovette, jennifer	Lovette, Kirsten
Low, Amanda	Low, Sammy	Lowans, Jennifer	Lowe, Allen	Lowe, Bob	Lowe, Dolores
Lowe, Jacklyn	lowe, james	Lowe, Judith	Lowe, Julie	Lowe, Kimberly	Lowe, M
Lowe, Margot	Lowe, Mary	Lowe, Melanie	Lowe, Monitta	Lowe, Nancy	Lowe, Paige

Lowe, Stacey	lowe, susan	Lowell, Nancy	Lowen, Nelly	Lower, Emma	Lowery, Candice
Lowery, Gabriella	Lowery, Zachary	Lowman, James	Lowrance, Avila	Lowrance, Herb	Lowrey, Adelaide
Lowrey, Jan	lowry, candace	Lowry, Jamie	Lowry, Janet	Lowry, jillian	Lowry, Lindsay
Lowry, Marsha	Loya, Christina	loyola, ivonne	lozada, nora	lozano, ceci	Lozano, Lynn
Lozano, Michael	Lozier, Dave	Lozon, Rob	Lozoraitis, Susan	Lubbers, D.	Lubbers, Linda
Lubin, Hilary	Lubin, Loni	Lubitz, Iris	Luby, Chansey	Lucas, Angela	Lucas, Carolyn
Lucas, guadalupe	Lucas, Janie	Lucas, John	Lucas, Kurt	Lucas, Lorrene	Lucas, Mary
Lucas, Nancy J.	lucas, RN, FNP-C, rosa	lucas, steve	Lucas, Vincent	LUCAS-BROWNE, TEDDI	Lucas-Haji, Geraldine
Lucas-Leger, Kelley	Lucchinetti, Sirena	Luce, Angie	Lucero, Dolores	Lucey, Michael	Lucia, John
Lucia, Kitty	Luciani, Marcia	Luciano, Liana	Lucious, Patricia	Luck, Diane	Luck, Patricia
Luck, Peggy	Luckey, Jane	Luckhardt, Andrew	Luckini, Karen	Lucy-Ilan, Laura	Luczyski, Richard
Ludbrook, Helen	Ludhi, Parsa	Ludington, Mary	Ludlow, Steve	Ludvik, Joan	Ludwick, Heidi
Ludwick, Kathryn	Ludwig, A	Ludwig, Deb	LUDWIG, KARA	Ludwig, Margaret	Luebbe, Linda
luebke, jim	Luedeke, Amy	Luepke, Diane	Luera, Amelia	Luethans, Tod	luff, rundi
Luft, Alicia	lugardo, Edwin	Lugin, Annie	Lugo, Jesus	Lugten, Peter	Lui, Irene
Lujan, Mitra	Lujan, Steven	Lukacova, Mariana	Luke, Fred	Lukehart, Ashley	Lukens, Jill
Lukensmeyer, Pat	Luker, Elena	luker, shari	Lukianenko, Svetlana	Lukich, Betty	Lukowsky, Alison
Lule, Janine	Lulla, Tara	Lum, C	Lum, Jeanna	luminella, linda	Lumly, Coleen
Lumsden, Sylvan	Lumsden, T. Allen	luna, jesscia	luna, laura	Luna, Monica	Luna, Sofia
Luna, Taylor	Lund, Cindi	Lund, Sonja	Lundberg, Crys	Lunde, Kris	Lunde, kristen
Lunde, Nils Anders	Lundemo, Charlotte	Lundgaard, Christina	Lundquist, Judy	Lundquist, Liz	Lundy, Marj
Lunetta, Anyes	Lunny, Lisa	Luokka, Katie	lupabella, nica	Lupercio, Grace	Lupfer, Joe
Lupo, Sandra	Lupori, Stacy	Lupton, Claire	Luq, Adri	Luque, Margarita	Lutero, Sheri
Luth, Sarah	Luther, Carol	Luther, Sarah	luthringer, beatrice	Luthy, Marjorie Anne	Luttana, Roxann
Lutterman, Jann	Lutterman, Lloyd	Lutterotti, Heather	luttrell, phil	Luttrell, Sarah	Lutz, Nancy
Lutz, Roberta	luursema, Eva	Lux, Karin	Lux, Katherine	Luyendyk, Laura	Luzier, Maresa
LYCZYNSKI, BRIAN	Lyden, Carla	Lydick, Eva	Lyken, Randall	Lykins, Greg	Lyle, Audrey
Lyle, J.	Lyle, Rebecca	Lyman, Teresa	Lymworth, Bhavana	Lynch, Annette	Lynch, Bridget
Lynch, George	Lynch, John	Lynch, Kelly	Lynch, Lee	Lynch, Melisa	Lynch, Ronda
Lynch, Sandy	lynch, sarah	Lynch, Thomas	Lynch, Tina	Lynch, W	Lyndale, Patricia
Lynn, Alice	Lynn, Amy	Lynn, Dawn	Lynn, Georgia	lynn, michelle	Lynn, Sandy
Lynn, William	Lynott-Carroll, Lisa	lynskey, paul	Lyon, Barbara	Lyon, Billie	Lyon, Edward
Lyon, Jamie	Lyon, Joanne	Lyon, Kelly	Lyon, Laura	Lyon, Ruth H.	Lyon, Sally
Lyons kalmenson, karen	Lyons, Brenda	Lyons, Donna	Lyons, Jeremy	Lyons, Jessica	Lyons, Kathi
Lyons, Mary	Lyons, Melyssa	Lyons, Patricia	Lyons, Rani	Lyons, Sarah	Lyons, Sarahlee
lyons, steve	Lyons-Fairbanks, Janet	lysett, lisa	Lyshaug, Anne Kari	Lysle, Scott	Lysle, Scott
Lysne, John	Lystad, Karin	Lystig, Becky	Lystiuk, Sydney	Lytle, Kathleen	Lytle, Rebecca
M AWAY, Anne	M, A	M, A	M, Ann	M, Bonnie	M, D
M, G	M, Joanna	M, Johanna	M, Karina	M, Kay	M, Larry
M, LINDA	M, Lora	M, Michael	m, miriam	M, N	M, P
M, Rachelle	M, Shamaila	M, Shawne	m, shira	M, T	M, Takako
M. Hassa, Linda	M., A.	M., Alexis	M., F.	M., Ulisses	Ma, Frederick
Ma, Hsueh	Ma, Ola	Ma, Sandy	Ma, Sean	Maani, Michelle	Maar, Sandra
Maaske, Donna	Mabry, Monica	Mac Bean, William	Mac T►re, Ram►n	Mac, Janie	Macaitis, Aimee
Macan, Catherine	Macan, Edward	MacArthur, June	MacArthur, Ron	MacArthur, Scott	MacAulay, Robert
Maccabee, Pam	maccari, joan	MacCartney, Jan	MacConaugha-Snyder, Morgan	Macconnell, John	Macdonald, Angus M
MacDonald, Betty	Macdonald, Cecily	MacDonald, Gordon	MacDonald, Janette	MacDonald, Kathleen	Macdonald, Kevin
MacDonald, Natalie	MacDonald, Nilah M.	Macdonald, Robert	MacDougall, John	MacDougall, Scott	MacDougall, Suzanne
Mace, Pat	Mace, Shai	mace, Sophie	Maceri, Antoinette	MacEwan, honey	MacFadyen, Jack
MacGregor, Amber	MacGregor, Sylvia	MacGuire, Mike	Machdo, Heidy	Machin, Rick	Macias, Anna
Macias, Elizabeth	Macias, Sherry	Maciel, Marie	macilroy, carol	MacIntosh Hopewell, Amy	Macioci, Tina
mack, alexandra	Mack, Carrie	Mack, Jean	mack, kathryn	mack, Svetlana	Mack, Theodore

MacKay, Bruce	Mackay, Camille	Mackay, Donald	MacKelvie, Elizabeth	MacKelvie, Elizabeth	MacKenn, Lee
MacKenzie, Ashton	MacKenzie, Lisa	MacKenzie, Michelle	MacKenzie, Susan	Mackey, Alexandra	MACKEY, DAVID
Mackey, Newoka	Mackie, Claudia	Mackie, Clifford	mackin, carleen	MacKinnon, Bonnie Lynn	MacKinnon, Bonnie Lynn
MacKinnon, Maisie	MacKinnon, Marie	Mackle, Susan	Mackler, Donald	MacKrell, Chris	Mackura, Patricia
MacLaren, Malcolm	MacLean, Greta	maclean, rebecca	MacLeod, Dianna	Maclise, Lauren	MacMillan, Brigitta
MacMillan, Gail	MacMurray, Christine	MacMurray, Christine	Macnak, Dorothy	MacNeil, Chris	MacNeil, d'Anne
MacPherson, Amber	MacPherson, Michael	MacRae, Ellen	MacRaith, Bonnie	MacWaters, Laura	Madak, cindy
madarasz, e	Madden, Meg	madden, necla	madden, Nicole	Madden, Trish	Maddlone, Claire
Maddock, Debbie	Maddox, J	Maddox, Lindsey	Maddox, Martha Ellen	Madeco-Smith, Mary	Mader, Melissa
Maderak, Terry	Mader-Wasko, Beth	Madia, Justin	madigan, teran	Madison, Candris	Madison, Debra
Madison, Geoffrey	Madison, Peter	Madison-Kennedy, Jessika	Madole, Gary	Madole, Yvonne	Madrazo, Angeles
Madrid, Ana	Madrid, Jade	madrid, kaleo	Madrid, Kathleen	Madrigal, Javier	Madrigal, Serina
madriles, gabriella	Madsen, Lisa	Madsen, Mark	Madsen, Michelle	Madu, Kwende	Madyun, Clarence
Maen, Lennie	maes, chris	Maestre, Antonia	Maestro, Betsy	Maestro, Miguel	Maffitt, Kathie
Magalas, Marie Christina	Magana, Hannah	Magana, Maria	Magana, Susan	Magasich, Philip	Magee, C. Sharyn
magee, susan	Magee, William	Mager, Marlowe	Mages, Jennifer	Magesky, Sheila	Maggard, Claire
Magie, Bambi	Magill, Eugenia	maginnis, patricia	Magliola, Lawrence	Maglione, Judith	Magnat, Michele
Magner, Maureen	Magno, Myron	Magnuson, Carole	Magnuson, Lila	Magpantay, Yolanda	Magrath, Pat
Magri, Carleen	Magrino, Arlene	Magruder, Clayton	Maguire, Ashley	Maguire, Margit	Maguire, Patricia
maguire, paul	Magy, Arnold	Mahajan, Barbara	Mahajan, Crispino	Mahan, Amanda	Mahan, Connie
Mahan, James	Mahan, Rose	Mahanay, Patrick	Mahaney, Lilly	Mahepath, Lincoln	Maher, Beverly
maher, cheryl	maher, Courtney	Maher, Michelle	Maher, Nicole	Maher, Patricia	Maher, Patricia
Maher, Tamara	Mahfooz, Sarah	Mahlau, Cynthia	Mahle, Peggy	Mahler, Carol	Mahler, Matthew
Mahnic, Mark	Mahnke, Douglas	Mahnken, Jody	mahola, anaiamari	Mahon, Donal	Mahon, Pat
Mahoney Stopyra, Melanie	mahoney, gael	Mahoney, Jack	Mahoney, Jim	Mahoney, John	Mahoney, Mary
Mahoney, Wayne	Mahony, Elizabeth	Mahony, Kathleen	mahova, muza	Mahr, Coraminita	Maida, Alice
Maiden Mueller, Paul	Maier, Mary	mailander, joan	Maine, Kathy	Mainwaring, Laura	maio, carol
Maiorino, Monica	Mair, Lisa	Mair, Pat	Maire, Audrey	Mairs, Nancy	Maiti, Aaneik
Maitner, Martin	Maitre, Florian	Maize, Jacki	Majerowicz, Eugene	MAJID, FARHANA	Major, Andrew
Makal, Neil	Maker, Janet	Maker, June	Makhijani, Shakuntala	Makled, Hassan	Makman, Marianne
Makowski, Kara	Makowski, Michael	Makowski, Patricia	Maku, Maya	Malae, Mara	Malanga, Vanessa
Malan-Thompson, Kathleen	Malarney, Holly	Malaspino, Michelle	Maldonado, Gloria	Maldonado, Jackie	maldonado, jeniffer
Maldonado, Lisa	Maldonado, Melissa	Maldonado, Nancy	Maldonado, Waleska	Malek, Anthony	Maletsky, Susan
Maletta, Anna	Malfroid, Ruth	Malhi, Harneel	malik, maya	Malik, Misbah	malik, tasneem
Malin, Catherine	Malin, Shawnea	Malin, Terry	Malinowski, Alice	malkus, Joy	Mallalieu, Ken
Mallett, Barbara	Malley, Areej	Mallin, Teresa	Mallon, Anne-Marie	Mallon, Tracy	Mallonga, Danny
Mallory, Janeth	Mallory, Richard	Mallott, Glenn	Mallow, Ann	malloy, athena	Malloy, Mary
Malmid, Stuart & Wendy	Malmquist, Lisa	Malmuth, Sonja	Malnati, Peggy	Malone, Annie	Malone, Evelyn
Malone, Jim	Malone, Kevin	Malone, Mary Franceline	Malone, Tonya	Maloney, Angie	Maloney, Bonnie
Maloney, Charlotte	Maloney, Debbie	MALONEY, gail	Maloney, Patrick	Maloney-Winder, Erin	Malott, Carol and Michael
Maloy, Renee	Malpica, Anita	Malven, Tania	Malvin, Donna	Malvone, Janet	Malyon, Hilary
Malysheva, Veronica	Mamdani, Tahera	MAMMERI, Claudine	Mamoyac, Joy	Mamut Sosa, Valentina	Man, cave
Manaois, Amalia	Manasan, R	manatis, leah	Manboadh, Alexandra	Mancebo, Victoe	Mancini, Alfred
Mancuso, Allison Cara	Mancuso, Erica	Mandan, amanda	Mandel, Greg	Mandel, Malvina	Mandell-Rice, Bonnie
Manders, Jen	Mandile, Chara	Mandy, Lauren	Manes, Neal	Maness, Celia	Maness, Karl
Mangels, Doreen	Manges, Laura	Manglitz, Marj	Mangold, Colin	Mangus, Tracey	Mangus, Tracey
Manibay, Angela	Manildi, Barbara	Manis, Laurie	Maniscalco, Peter	Manivong, Leila	Manji, Ish
manji, Ish	Mankad, Anuj	Mankamyer, Elisabeth	Mann, Barbara	Mann, Doreen	Mann, Jo Karan

Mann, Kaye	Mann, Lisa	Mann, Robin	Mannchen, Donna	Manne, Noah	Mannering, Michelle
Mannering, Natalie	Manners, Laurie	Manning, Clare Jo	manning, emily	manning, JENNIFER	Manning, Jennifer
Manning, Joseph	Manning, Judi	Manning, Kim	Manning, Kim	Manning, Laura	Manning, Tanya
Manno, Margaret	Mannoni, Bruno	Manns, Timothy	Mannsfeld, Bjoern	Manser, Rhonda	Mansfield, Lynn
Manske, Amber	Manske, Trisha	Mantecon, Crystal	Mantey Smith, Emily	Manuele, Morgan	Manz, Mark
manzanedo, Marcella	Manzo, Alexia	Mapes, David & Jenny	Mapes, James	Mapes, Laura	Maples, Floyd
Mappin, Wes	Marable, Nina	Marano, Gina	Marble, Linda	Marbury, Ariel	Marcano, Vanessa
marcano, yamilet	Marcantonio, Kay	Marcellino, Joni	Marcellis, Anita	marcengill, shana	Marceron, Dennis
March, Mark	March, Patricia D	Marchand, Babs	Marchand, Babs	Marchand, MarieCNFwrd	Marchbank, Michelle
Marchetti, Joseph	Marchlevski, Liz	Marchock, Judith	marciano, Dorothy	Marconi, Cynthia	Marcott, Todd
Marcotullio, Louis	Marcoux, Justine	Marcroft, Catherine	marcum, Mackenzie	Marcus, Chris A.	Marcus, David
Marcus, Jack David	Marcus, Melissa	Marcus, Sybil	Marcussen, Paul	Marcy, Marian	Marek, Leopold
Marge, Debra	margerin, marijo	Margerison, Robert	Margerum, Jake	Margheim, Colleen	Margolis, Laurence
Margowski, Frank	Margraff, Ellen	Margulies, Cheryl	margulies, jeffrey	MARGULIES, MARGARET	Margulis, Elise
Mari, Dolores	Mari, Marianne	mariconde, maryann	marie, abela	marie, chris	Marie, Kay
Marie, Linda	marie-claude, gil	Marienau, Suzanne	Marin, Almis	Marina, Aida	Marinari, Margaret
Marinelli, Kathy	Marinelli, Laura	Marinilli, Jennifer	Marino, Nina	Marino, Thomas	Marino-Baker, Luca
Marinucci, Lou	Marion, Carolyn	Maris, Christina	Marish, Elka	Marjason, Monika	Marjoricastle, Val
Markels Webber, Rachel	Markert, Gabriele	Markert, Lynn	Markham, Craig	Markham, David	Markham, Gay
Markham, John	Markillie, Paul	Markovic, Brigite	Markowitz, Susan	Markowski, Kevin	Marks, Elise
Marks, Eva	Marks, Gaye	Marks, JB	Marks, Kelly	marks, seth	Markus, Caitlin
Markus, Mary	Markushewski, Edward	Marlatt, Patricia	Marley, Bryan	Marley-Merchant, Roberta	Marling, Nick
Marlowe, B	Marmo, Sheryl	marmorstein, daniel	Marne, Marielle	Marom, Nicole	Maron, Country
Marone, Regina	Marone, Sally	Marone, Susan	Marone, Yvonne	Marquardt, Barbara	Marquardt, Michael
marquardt, mirabai	Marquet, H Robert	Marquet, Jane	marquette, rona	Marquez, Jacquie	Marquez, Margarita
Marquis, Sharon	Marr, Judy	Marr, Michael	Marr, Rhonda	Marra, Tony	Marrero, Arnold
Marrero, Maria	Marriott, Anne	Marriott, Jessica	Marriott, Laurie	Marriott, Lee	Marron, Jillian
Marrone, Rhonda	Marroquin, Arlyn	Marrs, Cynthia	Mars, Rebecca	Marsalis, Diane	Marsalkova, Zuzana
Marsari, Gisela	Marschner, Sandra	Marsden, James	Marsh, Cathy	Marsh, Irene	Marsh, Kate
Marsh, Kate	Marsh, LInda	Marsh, Marion	Marsh, Patricia	Marsh, Susan	Marshall, Beth
Marshall, Bruce	Marshall, Carol	Marshall, Carol	marshall, caroline	marshall, catherine	Marshall, Cathy
Marshall, Chelsea	Marshall, Christine	Marshall, Cynthia	Marshall, Dolly	Marshall, Doris	Marshall, Edna
Marshall, Erin	Marshall, Frederick	Marshall, Jacqueline	Marshall, John	Marshall, Joshua	Marshall, Kathryn
Marshall, Leslie	Marshall, Mark	Marshall, Nancy	Marshall, Nicole	Marshall, Rebel	Marshall, Rilla
Marshall, Robert	Marshall, Stephen	Marshik, Jessica	Marsilii, Lisa	Marsillo, Mary	Martakos, Karen
Martel, Kevin	Martell, Jon	Martellaro, Karen	Martello, Linda	Martens, Bill	Martens, Linda
Martha, William	Martijena, Alejandro	Martin, A	Martin, Abe	Martin, Anne	Martin, Annette
Martin, Arnie	Martin, Ashley	Martin, Barbara	Martin, Barbara	Martin, Barbara	Martin, Benjamin
Martin, Beth	Martin, Bill	Martin, Brian	Martin, Carol	Martin, Carolyn	Martin, Cat
Martin, Cathy	martin, celia	Martin, Chase	martin, claudean	martin, david	Martin, Deborah
Martin, Dixie	Martin, Drew	Martin, Eileen	martin, evelyn	martin, frances	Martin, George
Martin, Gerry	Martin, Janet	Martin, Jeanne	Martin, Jessica	Martin, Joanne	Martin, John
Martin, John	Martin, John	Martin, Julie	Martin, Julie	Martin, Karen	Martin, Kathleen
Martin, Kathy	Martin, Kimberlee	Martin, Kimberly	Martin, Kimmy	Martin, Kitty	Martin, Kristi
Martin, Linda	Martin, Linda	Martin, Linda	Martin, Liza	Martin, Lois	Martin, Louis
Martin, Luis	MARTIN, LYNN	Martin, Martha E.	Martin, Mary	Martin, Mary	Martin, Meg
Martin, Melissa	Martin, Melissa	Martin, Merry	Martin, Michael	martin, michele	Martin, Nancy
Martin, Nicole	Martin, Ninette	Martin, Pam	Martin, Pamela	Martin, Pat	martin, patricia
martin, patty	Martin, Paula	Martin, Rebecca	Martin, Rebecca	Martin, Rebecca	Martin, Reginald
Martin, Richard	Martin, Robert	Martin, Robin	Martin, Rodney	Martin, Ronald	Martin, Roxanne
Martin, Sally	Martin, Samie	Martin, Sandra	Martin, sarah	Martin, Shannon	Martin, Sheila
Martin, Sheila	Martin, Sheina	Martin, Stephen	Martin, Susan	Martin, Tanya	Martin, Teresa
Martin, Timothy	Martin, Tobe	Martin, Wendy	Martina, Karena	martine, sadon	Martinet, Thomas A.

Martinez, Angel	Martinez, Angela	martinez, angie	Martinez, Anna	Martinez, April	Martinez, Brenda
Martinez, Brittany	Martinez, Catherine	martinez, cesar	Martinez, Cherie	Martinez, Christina	Martinez, Corinne
Martinez, Damaris	Martinez, Erick	Martinez, Genoveva	Martinez, Israel	martinez, janet	Martinez, Janie
martinez, john	martinez, julietta	Martinez, June	martinez, lea	Martinez, Linda	Martinez, Lorraine
Martinez, Lydia	Martinez, Mariela	Martinez, Martha	Martinez, Maureen	Martinez, Melanie	Martinez, Melissa
Martinez, Monica	Martinez, Nancy	Martinez, Nathalie	Martinez, Oscar	Martinez, Patricia	Martinez, Patricia
Martinez, Priscilla	Martinez, Rafael	martinez, sophie	Martinez, Viviana	martinez, yolanda	Martinez-Myhre, Joy
Marting, Diane	Martini, Mon	Martini, Rich	Martino, Bianca	MARTINO, IRMGARD	martin-risk, jan
Martins, Andrea	Martins, Claudia	Martinson, Julianne J.	Marton, Dennis	Marton, Sue	Martorano, Ray
Martucci, Marilyn	Marty, Elisa	Martyn, Richard	Martyn, Richard	Maruri, Trishia	Marvet, Michael
Marvonek, Arlene	Marvy, Bevan	Marwood, Frank	Marx, Charella	Marx, Marilyn	mary, christelle
Maryniak, Patricia	Marzban, Karina	Marzouki, Rieka	Masani-Manuel, Nzingha	masar, Jacki	Maschke, Nicole
Maschkötter, Gabi	Mascuilli, Nicholas J.	MASDON, BENNY	Maseda-Gille, Sheila	Masek, Marti	Masepohl, Holly
masicampo, A	Maslanek, Michael	Maslin, Cheryl	Maslin, Linda	Maslin, Linda	Mason, Anne
Mason, Barbara	Mason, Bonnie	mason, carlie	Mason, Cathy	Mason, David	Mason, Douglas
Mason, Emily	Mason, Emma	Mason, G	Mason, James	Mason, Joyce	Mason, Juana
Mason, Judy	Mason, Linda	Mason, Lucy	Mason, Luther	Mason, Marcie	Mason, Marilyn
mason, mary	Mason, Mary	Mason, Sandra	Mason, Stephanie	Masotti, Katherine	Massa, Alison
Massah, Cherilyn	Massalsky, Sarah	Massar, Marc	Massar, Marc	Massara, Laura	Massaro, Marion
Massaro, Sherry	Massei, Paul	Massett, Jessica	massey, carolyn	massey, Carolyn	Massey, Cf
Massey, Cindy	Massey, Ironesha	Massey, Katherine	Massey, Linda	Massey, Susan	Massi & family, Dr Joseph
Massimino, Jacki	Masten, Lorraine	masters, clayton	Masters, Dale	Masters, Judy	Masters, Mary
Masters, Mary	masters, susan	Masterson, Hallie	Masterson, Nancy	Masterson, Terri	Masto, Marc
Maston, Brenda	Mastri, Francis	Mastri, Len	Masuhr, Michelle	Mata, Judith	Mateja, Bear
Matelski, Lauren	Mateo, Jill	Materi, Karey	Materi, Sandra	Matheny, Albert	mather, jane
Mather, Megan	Mathes, Barbara	Mathes, Barbara	Mathes, Karen	Mathes, Maryanne	Mathes, William
Matheson, Diane	Matheson, Meigs	Matheson, Neill	Matheson, Shannon	Mathew, Victoria	Mathews, A
Mathews, Karen	Mathews, Peter	Mathews, William	Mathias, Laurie	Mathieson, Marty	Mathieson, Marty
Mathis, Jacqueline	Mathis, Sydney	Mathison, Marcia	maticic, holly	Matiella, Tessa	Matlack, Deborah
Matlick, Tricia	Matlin, Thelma	Matlock, Dale	Matlock, Eric	Matlock, Kevin	Matos, Allison
Matos, Nelia	Matos, Samuel	matra, robyn	matrone, roberto	Matson, Cheryl	Matson, Leila
matsuda, D	Matsui, Jerry	Matsui, Vicky	Matsumoto, Mari	Matt, Elisabeth	MATTELL, M
Mattes, Dale	Matthew, Antonia	Matthews, Allison	Matthews, Amy	Matthews, Bernard	Matthews, Gary
Matthews, Karen	Matthews, Lisa	Matthews, Phillip	matthews, rheannon	Matthews, Rissa	Matthews, Wade
Matthiessen, Laura	Mattice, Linda	Matticola, Sharon	mattingly, Rebekah	Mattioli, Santo	Mattocks, Allison
Mattox, Linda	mattox, sharon	Mattson, Ann	Mattson, Virginia	Matty, Dee	Matula, Julie
Matula, Mike	Matulich, Shirley	Matulina, Karen	Matus, Maria	Matusik, Robert	Matusinka, Alexandra
Matuson, Priscilla	Matuszak, David	Matykiewicz, Miranda	Mauclair, Mathieu	Maughan, Margith	Maughan-Brown, Peter
Maull, Cassandra	Mauner, Claudia	Maupin, Judith	Maurer, Nicole	Maurice, Ken	Maurice, Vincent
Mauritz, Renee	Maurizi, Simonetta	Mauro, Karin	Mavrovitis, Leo	mawhorter, carol	Maxell, Diana
Maxfield, Lori	Maximin, Whitney	Maxson, Ronald	Maxson, Susan	Maxwell, Lynn	Maxwell, Maxine
Maxwell, Mindy	Maxwell, Mraria	Maxwell, Richard	maxwell, sacha	Maxwell, Sally	Maxwell, William
May, Alicha	May, Amber	May, Ann	May, Audra	May, Chris	May, Dana
May, Hildy	May, Jim	May, Kathleen	May, Lorrain	may, Roger	May, Vanna
Maya, Sophie	Maye, R. B.	Mayeda, Lynn	Mayeda, Mark	Mayer, Becca	Mayer, David
mayer, kelly	Mayer, Ken	Mayer, Mary	mayer, melody	mayer, robert	Mayerat, Robin
Mayers, Katherine	Mayers, Katherine	mayers, maxyn	Mayes, Cindy	Mayes, Michelle	Mayes, Paul
Mayfair, Jessica	Mayfield, Christell	Mayfield, Esther	Mayfield, Molly	Mayger, Bonnie	Mayhew, Judith
mayhew, marlane	Mayhew, Sarah	Maymi, Josue	Maynard, Kayla	Maynard, Kim	Maynard, Linda
Maynard, Linda	Maynard, Lorraine	Mayo, Alberta	Mayo, Mary Ellen	mayo, matthew	Mayo, Sheila
Mayor, Kelly	Mayorga, Trina	Mayosky, Denise	mayr, sabine	Mays, Brian	Mays, Constance
Mays, Deborah	Mays, Kimberly	Mays, Ryan	mays, stephanie	maywhort, centina	Mazeika, Rhonda
Mazel, Leah	Mazer, Sarah	Mazhnyy, Mark	Mazour, Connie	Mazrimas-Ott, Christy	mazur, karin
Mazur, Marilyn	Mazurczyk, Monika	Mazursky, Sherri	Mazuzan, Marilyn	Mazza, Marian	Mazza, Reba

Mazzarella, Barbara	Mazzeo, Laurie	Mazzi, Suzanne	mazzilli, liliana	Mazzola, Lisa	Mazzoni, Morgan
Mazzoni, Morgan	Mbayo, Edna	mc ara, patrice	Mc Callum, Renie	Mc Calmont, Jay	mc connell, joseph
Mc Cune, Bonnie	Mc Donal, Frances	Mc George, Jo Ann	Mc Ginley, Edward J	Mc Gonigal, Joan	Mc Kee, Barbara
Mc Kinlay, Donald	Mc Kinnie, Robert	Mc Manus, James	MC RAE, CHARLES	MCABOY, EMMA	McAdoo-Steiner, Eirini
McAdory, Liz	Mcaffee, loretta	McAliley, Robin	McAlister, Kevin W.	McAlister, Krystal	McAlister, Shirley
McAlister, Suzann	McAllan, Liam	McAllister, Bonnie	McAllister, Robert W	McAloon, Judy	Mcalpine, Emily
McAnulty, David	McAnulty, Mary	McAroy, Frances	McArthur, Gillian	McArthur, Rebecca	McArtor, Robert
McAskill, Sophia	McAtee, Cheryl	McAtee, Nicole	McAuley, Anita	McAuliffe, Grace	McAUliffe, Melissa
McAvoy, Anne	MCBEE, REBECCA	McBirney, Joanne	McBreen, Anna	McBride, Alissa	McBride, Cherrie M
McBride, J.	McBride, Kelly	McBride, Kevin	mcbride, mary	McBride, Nancy	McBride, Roslyn
McBroom, Angelica	McBroom, Linda	McCabe, lori	McCabe, Maureen	mccabe, nancy	McCabe, Susan
McCabe, Taree Jo	McCaffery, Candace	McCain, Joe	McCain, Patricia	McCalister, Janet	McCall, Donovan
McCall, Linda	McCall, Lisa	McCall, Michael	McCall, Theresa	McCampbell, Christopher	McCandlish, Karen
McCann, Elaine	McCann, Kathy	McCann, Yvonne	McCarron, Janine	McCarthy, Ai	McCarthy, Alesia
McCarthy, Bebe	mccarthy, chris	McCarthy, Clarence	McCarthy, Deborah	McCarthy, Faith	Mccarthy, Jean
Mccarthy, Judith	McCarthy, Julia	McCarthy, Linda	McCarthy, Louise	Mccarthy, Maggie	McCarthy, Monica
McCarthy, Peggy	McCarthy, Susan	McCarty, Alexander	mccarty, layla	McCarty, Valerie	McCarty., Veronica
McCaskill, Cindy	Mccaslin, Lorna	McCaughey, Linda	McCauley, Alison	McCauley, Brandi	McCauley, Carolyn
McCauley, Elizabeth	McCauley, Maureen	McCauley, Patricia	McCaulley, Michelle	McClain, Denise	Mcclain, Hanifah
McClain, Karen	McClain, Kris	McClain, Molly	McClanahan, JoAnn	Mcclatchy, Meredith	McClean, Robert
McCleary, Bob	McCleary, Elizabeth	McCleary, Harriet	McClellan, Jeffrey	McClellan, Linda	McClellan, Ryan
McClellan, Shannon	McClelland, Eric	McClendon, Michelle	McClenney, Donna	McCloskey, Yony	McCloud, JG
McCloud, Kalyn	McClune, Wanda	McClure, Eric	McClure, Veronica	McClurg, Daviann	McClurg, Sheila
McCochran, Frances	McCollim, Jeffrey	McCollum, John	McCollum, Sudi	McCollum, Tom	McCombe, Bridget
McCombs, Genie	McCombs, Richard	McCombs, Robert	McConaghy, Barbara	Mcconaughy, Jeffery	McCone, Peter
McConkey, James	McConnell, Cynthia	McConnell, Denise	McConnell, Johanna	McConnell, Kelly	McConnell, Marlene
McCool, Mike	Mccord, Jack	McCormack, Elizabeth	McCormick, Brigid	McCormick, Joan	Mccormick, Sandra
Mccormick, Thomas	McCormick, Thomas	Mccormick, Thomas	MCCORMICK, TINA	McCoubrie, Elise	McCown, Ellen
mccoy, amy	McCoy, Cherie	McCoy, Cheryl	McCoy, Dawn	McCoy, Deborah	McCoy, Julie
Mccoy, Sarah	McCracken, Abigail	McCracken, Linda	McCracken, Tom	Mccrane jr, Sean	McCraven, Dennis
McCray, Donni	McCreary, Jan	McCreary, Melissa	McCrone, Eric	McCue, Mike	Mccue, Mike
McCuen, Annie	McCulloch, Margaret	McCulloch, Samuel	mccullouch, Scott	McCullough, Debra	McCullough, Ellen
mccullough, krissi	McCullough, Maureen	McCullough, Suzanne	McCullough, Tanner	McCullough-Payne, Leslie	McCumber, Peter
McCune, Natalie	Mccune, Sylvia	Mccurdy, Dassi	McCurdy, Kathy	McCurry, Evelyn	McCurty, Tiio-Mai
Mccutchan, Jo	McCutcheon, Cynthia	McCutcheon, Meghan	McDaid, Gerald	McDaniel, Ashley	Mcdaniel, Bo
McDaniel, Genelle	McDaniel, Kenneth	McDaniel, Larry	McDaniel, Lisa	McDaniel, Pat	McDaniel, Paula
McDaniel, Skot	McDaniel, Terry	McDeane, Sandy	McDermit, Evan	McDermott, Denise	McDermott, Dion
McDermott, Eileen	mcdermott, jeff	McDermott, roxy	McDonald RVT, Erin	mcdonald, brennan	mcdonald, carita
McDonald, Christine	McDonald, Clarissa	McDonald, Claude	McDonald, DayLynn	McDonald, Diane	mcdonald, earl
McDonald, Emily	McDonald, Erica	McDonald, Gary	McDonald, Holly	McDonald, Jamelynn	McDonald, Jane
McDonald, Jr., Stanley	McDonald, Judy	Mcdonald, June	McDonald, Kim	McDonald, Mary Ann	McDonald, Ralph
McDonald, Rita	McDonald, Tina	McDonald-Chan, Lesa	mcdonnell, jameson	McDonnell, Lauren	Mcdonnell, Robert
McDonough, Elizabeth	McDonough, Pamela	McDonough, Rebecca	McDonough, Susan	McDorman, Mary	McDougal, Jennifer
McDougal, Linda	Mcdow, Derek	McDowell, Ethel	McDowell, Eugene	McDowell, Shirley	McDuffie, Holly
McEachronTaylor, Linda	McElroy, Laura	McEneany, Mary Sarita	McEnroe, Eileen	McErlean, Leslie	McEuen, Traci
McEvoy, Theresa	McEwan, Linda	McEwen, Rebecca	McFadden, Karen	McFadden, Linnea	McFall, Cynthia
McFall, Gayla	McFarland, Colleen	McFarland, David	McFarland, Heather	McFarland, Mary Ann	McFarland, Randy

McFarlane, Suzanne	McFarling, Lawrence	McFatridge, Richard	mcferren, andrea	McGaha, Lanette	McGahie, Jeanne
McGaughey, Mary	McGee, Dianne Dekich	mcgee, judy	McGee, Maureen	mcgee, michael	McGee, Natasha
McGeehan, Carol	mcgeehan, Carol	Mcgeehin, Rosa	McGehee, Emily	Mcgeorge, Carolyn	McGill, Ann C.
McGill, Tracey	McGill, Winston	McGillivary, M	McGinley, Alyssa	McGinn, Lisa	McGinnis, Ashley
mcginnis-craft, kathy	McGlashan, Maria	McGlashen, Ann	McGlasson, Liz	McGlen, Mary	McGloin, Karen
McGlone, Colleen	McGlone, Kimberly	McGlynn, Colum	McGoldrick, William	McGough, Alice	McGough, George
McGovern, Donlon	McGovern, Kathleen	McGovern, Kirsten	McGovern, Leslie	McGovern, Sheila	McGowan, Meghan
McGowan-Smith, Lorna	McGowen, Arvilla	McGrady, Victoria	McGrah, Chelsea	Mcgrath, Barbara	McGrath, Joan
McGrath, Joanne	mcgrath, julie	McGrath, Katie	mcgrath, maurice	McGrath, Patricia	McGrath-Mamone, Ellen
McGratty, jessica	McGraw, Edward	McGraw, Jane	McGregor, James	McGrew, Ester	McGrew, Lesley
Mcgrew, Lisa	MCGRINDER, E	McGRogan, Kathy	Mcgrogan, Marie	McGruder, Tim	McGuckin, Michelle
McGuiness, Cynthia	McGuinness, Karen	McGuinness, Noelle	McGuire, Ellie	McGuire, Jason	McGuire, Jessica
McGuire, Karen	MCGUIRE, Lee	McGuire, Louise	McGuire, Matthew	mcguire, michael	McGuire, Nan
McGuufin, Sharon	McHale, Cynthia	Mchale, Pamela	McHenry, Katharine	McHenry, Katie	McHenry, Stewart
McHone, Robert	McHone, veona	McHugh, Heather	McHugh, Karen	McHugh, Margaret	McIlhinney, Eileen
McIlroy, Bob	McIlroy, Kitty	Mcilvaine, Kimball	McIndoo, Hilary	McInerney, Anton	mcinnes, ken
McIntire, Sandra	McIntosh, James	McIntosh, Malva	McIntosh, Steve	McIntyre, Kathleen	McIntyre, Marilyn
McIntyre, Misty	McIvor, Deborah	McKaig, Kevin	McKain, Joshua	McKamey, Eugene	McKann, Sam
McKaughan, Molly	McKay, Jean	McKay, Ken	McKay, Rachel	McKean, Hanna	McKean, MARY JANE
McKee, Dave	McKee, Edythe	McKee, Elsie	McKee, John	McKee, Kaitlyn	MCKEE, KANE
McKee, Katie	McKee, Lary	McKee, Laura	mckee, olav	McKee, Sarah	McKee, Virginia
McKee, Wendy	McKeen, Christy	McKeen, Cynthia	McKellar, Christina	McKelvey, Andrea	McKelvey, Don
McKelvey, Gerald	McKenna, Abi	McKenna, Evony	McKenna, Jerry	McKenna, Lori	McKENNA, RED
McKenna, Richard	McKenney, James	McKenny, Michaeline	Mckenzie, Dan	Mckenzie, E	McKenzie, Virginia
McKeown, Joan	Mckernan, Tracey	McKibbin, Kimberley	Mckie, Jody	McKillip, Linda	McKinley, Diane
Mckinley, Kathleen	McKinley, Mary	Mckinley, patti	McKinney, Kathryn	Mckinney, Mary	McKinney, Sandra
mckinney, susan	McKissick, Sierra	McKnight, Alan	Mcknight, Genette	McKnight, Kimmi	mckone, clarissa
McKown, Elizabeth	McKown-Finken, Amber	McLain, Deanna	McLain, Robin	McLaine, Laura	McLauchlin, Donald
McLauchlin, Julie	Mclaughlin, Charles	McLaughlin, Dan	McLaughlin, Jayanne	McLaughlin, Joan	Mclaughlin, Jodi
McLaughlin, Joyce	McLaughlin, Kathleen	McLaughlin, Kathleen	McLaughlin, Mary	McLaughlin, Maud	McLaughlin, Nelda
McLaughlin, Pat	McLaughlin, Rohana	McLaughlin, Sarah	McLaughlin, Sharon	McLaughlin, Suz	McLean, Kim
Mclean, Marsha	mclean, sheila	Mclelland, Nancy	McLennan, Kari	McLeod, Allison	McLeod, Daniel
McLeod, Eileen	McLoughlin, Marta	Mcloughlin, Patricia	McLoughlin, Rosemary	McLuckie, Sandra	McLynne, Terrei
McMahan, Barbara	McMahan, Janice	McMahan, Lindsey	McMahon, Anah	McMahon, Annie	McMahon, Annie
McMahon, Kim	Mcmahon, Laura	McMahon, Nicholas	McManus, Anne	McManus, Rachael	McManus, Robert
McMenamin, Rosalie	McMillan, Douglas	McMillan, Joanne	McMillen, Marie	McMillion, Robin	McMonagle, Patricia
McMullen, Chanda	McMullen, laura	McMullen, Marilyn	McMullen, Unice	mcmurdie, kerri	McMurdo, Prem
McMurdo, Prem	McMurray, Amanda	McMurray, Tara	McMurren, Juliet	McMurtrey, Michael	McMurtrie, Susan
McMurtry, Erin	McNall, Shirley	McNally, Dennis	McNally, John	Mcnally, Julie	McNamara, Betty
McNamara, Catherine	McNamara, Dodi	Mcnamara, Jean	mcnamara, kevin	mcnamee, Lucy	Mcneely, Jennifer
McNeff, Janice	McNeil, Elizaeth	McNeil, Kerry	McNeil, Sylvia	McNeill, Douglas	McNeill, Norma
McNeill, Susan	McNeirney, Ellen	McNeny, Lindsey	McNew, Sandra	McNitt, Doris	McNitt, Tiffany
mcnulty, claudia	McNulty, Kathleen	McNulty, Terrence	McNutt, Barbara	McNutt, Robert	McPartland, David
McPartland, Joseph	McPeek, Gregg	McPherson, Alan	McPherson, Andrew	McQueen, Donna	McQuown, Roger
McRae, Diana	McRae, Eva	McReynolds, Cindy	McRill, Susan	McRorie, Joel	McRoy, Hayes
McRuiz, Michelle	Mcshane, Janice	McSpadden, Denise	McSwain, J.	McTaggart, Julie	mctee, jessica
McTigue, Robert	McUire, Kimberly	mcvay, kenneth	McVey, Diann	Mcvey, Kelly	McVey, Ruth
McVinnie, David	McWeeny, Devon	McWilliams, Cynthia	Meacham, Amy	Meachum, Marcy	Mead, Caroline
Mead, Melody	MEAD, Walter	Meade, John	Meade, Terra	Meade, Theresa	Meador, Steve
Meadow, Rhea	Meadows, Brian	Meadows, Cheryl	Meadows, Jennifer	Meadows, Justin	Meadows, Linda
meadows, sarah	Mealy, Dawn	Means, Jessica	Meany, Mary	mear, bertha	Meas, Monica

Mebane, Justin	Mechanic, Diane	mechem, rachele	Mecke, Ernst	Meddick, Sherry	Medeiros, Joseph
Medeiros, Leigh	Mediano, Manor	Medici, M Alexandria	Medick, melissa	Medina, Cinthia	Medina, Cristina
Medina, David	Medina, Genoveva	Medina, Giordana	Medina, Kathleen	Medina, Luis	Medina, Mark
Medina, Maureen	MEDLEY, BREGET	Medley, Emily	Medlin, Barry	Medlin, Mary	Medlock Jr, Howard
Mednis, J.	Medrano, Jeannette	Medved, Linda	Meehan, Don	Meehan, Ellie	Meehling, Susan
Meek, Roxanne	Meeker, Cheryl	Meeker, Chris	Meeker, Simone	Meeker-Lowry, Susan	Meeks, Angela
Meeks, Angela	Meeks, Helene carol	Meeks, John	Meeks, Mark	Meely, Cynthia	Meer, Ameena
Meer, Patti	MEERBOTT, DEBBIE	Meersman, Larry	Meese, Gail	Meghji, Julie	Megin, K
Mehaffey, Gail	Mehalic, Janelle	Mehan, Nancy	Mehbod, Desiree	Mehis, Jim	Mehle, Anthony
Mehlig, Alicia	mehling, christopher	Mehl-Rouschal, Christa	Mehta, Amal	Meibers, Michael	Meier, Charles
Meier, D.	Meier, Dana	Meier, Elsbeth	Meier, Faith	Meier, Felisa	Meier, Heidi
Meier, Kerry	Meier, Marian	Meier, Millie	Meier, Tim	Meijer, Joost	Meijer, Kristin
Meilhac, Pierre	Meinen, Marian	Meinhardt, Kevin	Meinhardt, Mark	Meinhardt, Pamela	Meisenbach, Jovinita
Meisinger, Linda	Meisner, Myron	Meister, Russell	mejia, antonia	Mejia, Lily	Mejides, Andres
Mekalonis, Alexis	Mekkadath, Sebastian	meladze, victor	Melamed Smith, Karen	Meland, Sandra	Melchiorre, Joe
Melchizedek, Michael	Meldrum, Nikki	Mele, Joanne	Melendrez, George	Melero, Holly	Melin, Nancy
Melinkoff, Marc	melissa, russo	melita, dominic	Melkerson, Robyn	Melkote, Gita	Mellendorf, JoAnn
mellin, kerry	Mellis, Delia	Mello, Alondra	Mello, Elizabeth	Mello, Gilberto	Mellom, Carol
Mellor, Marcia	Melloway, Terri	Melo, Elizabeth	Melo, Rosana	melonas, kris	Melora, Carol
Melson, Wilma	Melton, Alyssa	Melton, Dale	Melton, Jim	Melton, Julie	Melton, Ric
Melton, Ric	Melucci, Martin	Melvin, Judith	Melzar, Melinda	Memoli, Angela	Mena, Sandra
menard, kathryn	Menard, Rose Marie	Menasian, Helen	Menco, Bert	Mendel, Chris	Mendelsohn, Cal
Mendes, Aimee	Mendes, Desiree	Mendes, Stacey	Mendez, Javier	Mendez, Kylie	Mendez, Linda
Mendez, Maricela	Mendez, Molly	Mendez, Rebeca	Mendez, Virginia	Mendez, Virginia	Mendia, Jessy
Mendieta, Vince	Mendieta, Vince	Mendiola, Leah	Mendiola, Marcus	Mendousa, Tony	Mendoza, Catherine
Mendoza, Christina	Mendoza, Ernestina	Mendoza, Faith	Mendoza, Helen	mendoza, Israel	Mendoza, Margarita
mendoza, Mark	Mendoza, Martha	Mendoza, Maryann	Mendoza, Rae	Mendoza, Richard	Mendoza, Roxanne
Menechella, Tony	Meneese, William	Menendez, Giselle	Menendez, Ines	Menendez-Guyard, Carla	Menges, LIz
Mengoni, Mark	Menjivar, Jonathan	Menke, Peggy	Menna, Carlie	Menne, Suzanne	Mennel-Bell, Mari
Mense, Rolf	Mensen, Melinda	Menshek, John S	Mensing, Julia	menti, rachel	Mentrum, Bayard
Menzel, Sandra	Menzie, Heather	Meranus, Elaine	Mercado, Irania	Mercado, Jesus	Mercaldo, A
Mercaldo, Bonnie	Merced Cotto, Luis A.	Mercer, Angel	mercer, arlene	Mercer, Kyla	Mercer, L
Mercer, Michele	Merchant, Karen	Merchant, Lisa	mercier, louise	merdian, b	Meredith, Marilyn
Merhi, Hitaf	Meriam, Carole	Mericle, Melody	Mericle-Gray, Elissa	Merifield, Vanessa	Merino, Aimee
merino, aimee by	Merithew, Marcia	Merkel, Jane	Merkle, Jim	merlan, maritza	Merline, Laurie
Merlino, Ronald	Merljak, Julija	merlos, Paola	Merola, Jill	Merrell, Donald	Merrifield, John
Merrill, CoRey	Merrill, Donna	Merrill, Doug	merrill, toddy	merriman, keri	Merritt, Ron
Mershon, Stephen	Mertens, Jennifer	Mertig, Theodore	Mertikas, Jenny	Mertinak, Iveta	mertz, philip
Merz, Robert	Merz, Terri	Mesa, Carlos	mesa, eulalia	Mesa, Nancy	mesa, pol
Mesaros, Tom	Mesavage, R. Matilde	Meserve, John	Mesias, Briana	Meslar, Gerald	MESNER, Ana
Messatzzia, Linda	Messenger, Kristen	messenger, makaylah	Messer, Sheila	Messick, Emily	Messina, Annette
Messina, Carol	Messina, Jim	messina, marie	Messmer, Gottfried	mestre vicedo, maria magdalena	Metcalf, Alicia
Metcalf, Cathy	Metcalf, Kevin	metcalf, Matthew	Metcalfe, Dennis	Metcoff, Linda	Metelica, Nikita
Metheny, Lyn	Methven, B	Methven, Boone	Metje, Fran	Metress, Eileen	Mettie, Bonna
Metzgar, Carolyn	Metzger, Carol	Metzger, Harvey	Metzger, Karen	metzger, shelby	Meuche, Amanda
Meuer, Rita	meuris, evi	Meyer, Alice	Meyer, Barbara	Meyer, Carl	Meyer, Claire
Meyer, Colonel	Meyer, Colonel	Meyer, Colonel	Meyer, Dawn	Meyer, Edgar	meyer, elke
Meyer, Eric	Meyer, George	Meyer, Glenn	Meyer, Leonard	Meyer, Lisa	Meyer, Madalyn
Meyer, Marjorie	meyer, melodie	Meyer, Michele	Meyer, Nancy	Meyer, Nick	Meyer, Patrick
Meyer, Paul	Meyer, Paula	Meyer, Paulena	Meyer, Rachel	Meyer, Rachel	Meyer, Richard
Meyer, Rob	Meyer, Robert	Meyer, Robert	Meyer, Sandra	meyer, sarah	Meyer, Scott
meyer, sharie	Meyer, Susan	Meyer-Muller, Natalie	meyers, andrea	Meyers, Andrea	Meyers, Brandy
Meyers, Carla-Marie	Meyers, Catherine	Meyers, Donna	Meyers, Gary	Meyers, Gary	Meyers, Jim

Meyers, Mary	Meyers, Peter	Meyers, S.	Meyers, Sarah	Meyers, Sue	Meyers, Tamara
meyrick, Lori	meyrick, virginia	Meza, Joel	Meza, Joel	meza, sandy	Meza, Sharon
Mezrahi, Priscilla	mezzetti, marc	Miale, Charlene	Micek, Patricia Ann	Miceli, Megan	Michael, Marcia
Michael-Dahlmann, Tina Michael-Dahlmann	Michaelis, Mary	Michaelis, Whit	Michaels, Brenda	Michaels, Charmaine	Michaels, Christopher
MICHAELS, ELAINE	Michaels, Ian	Michaels, John	Michaels, Judy	michaels, kim	Michaels, Laurie
Michaels, Michele	Michaels, Traven	Michaelson, Lori	Michaelson, Raelyn	Michailidou, Helen	Michalak, Cheri
Michalek, David	Michalik, John	Michalios, Mary	Michalski, Hannah	Michalski, Patricia	Michas, Nick
Michaud, Mary	micheels, laurinda	michel, christine	Michel, Diane	Michel, Julia	Michel, Margaret
michel, marie-josé	Michelli, Kathy	Michels, David	Michels, Martha	Michelsen, Lee	Michelson, Alan
Michelson, Barbara	Michetti, Leslie	michetti, susan	Michniak, Jenny	michon, christelle	Michon, Leo
Michonski, Tracey	Micke, Marion M	Mickelsen, Patti	mickens, edwin	Mickle, James	Middleton, Ann
Middleton, Pat	Middleton, Sarah	Middleton-Downing, Laura	Middy, Kelly	Midgett, Jennifer	Midthune, Jill
Midyette, Shirley	Miele, Danielle	Mielke, Howard	Mielniczuk, Allison	Mielo, Laurie	Mientus, Marian Liza
Mier, Pedro	Miera, Patricia	Mierlot, Monique	Mies, Rynnaekkoe	Miess, Shira	Miettinen, Anne
Mietus, Norbert	Miezio, Marcianna	Miguel Vocals, Nuno	mihjazi, mariam	mikaella, kardasz	MikAl, Mikal Nieves
Mikhail, Gamal	Mikkelsen, David	Mikkelsen, Floris	Mikkelson, Brent	Miko, Jennifer	Miksovsky, Rose
Mikulic, Barbara	mikulik, jamila	Mil, Ju	mil, kat	Milanesi, Francesco	Milano, Karen
Milanowski, Tanya	Milark, Hollis	MILBEO, VALERIE	Milbourne, Shannon	Milburn, Kristy	Milcic, Marin
Milcowitz, Robin	Miles, Constance	Miles, cristal	Miles, DoRi	Miles, Jacqueline	Miles, Jenna
Miles, Leah	Miles, Sheila	Miles, Toni	Miletic, Snezana	Miletta, Lora	Milewski, Nancy
Milford, Elizabeth	Milic, Ljiljana	Milione, Regina	Milke, Sunny	Mill, MmAWAY	millar, bob
Millard, CAROLE	Millbrooke, Anne	Miller, Alison	Miller, Allen	Miller, Amy	Miller, Amy
miller, annika	Miller, Arlene	Miller, Barb	Miller, Barbara	Miller, Barbara	Miller, Bernadette
Miller, Betty	miller, betty	Miller, Bill	Miller, Bridget	Miller, Brooke	miller, carol
Miller, Carol	Miller, Caroline	Miller, Carolyn	Miller, Catherine	Miller, Charles	Miller, Chris
miller, cindy	Miller, Constance	Miller, Crickett	Miller, Crickett	Miller, dawn	Miller, Debra
Miller, Dee	Miller, Dennis	Miller, Diane	Miller, Dianne	Miller, Donald	Miller, Dwayne
Miller, E David	Miller, Ellen	Miller, Frank	miller, gael	Miller, Genevieve	Miller, Gloria
Miller, Greg	Miller, Gretchen	Miller, Harry	Miller, Heather	Miller, Heidi	MILLER, HENRY
Miller, Hugh	Miller, Jack	Miller, Jennifer	Miller, Jennifer	miller, jerry	Miller, Joan
Miller, Judy	Miller, Karen	Miller, Kathryn	Miller, Kelly	Miller, Kelsey	Miller, Laura
Miller, Laura	Miller, Lee	Miller, Lee	Miller, Libba	Miller, Liliane	Miller, Linda
Miller, Liz	Miller, Lorne	Miller, Lyn	Miller, Marcia	Miller, Marcia	Miller, Margie D
Miller, Marlene	Miller, Mary	Miller, Mary	miller, mary	Miller, Mary	Miller, Melanie
miller, melissa	Miller, Mile	Miller, Natasha	Miller, Pam	Miller, Pamela	Miller, Pamela
Miller, Pat	Miller, Peggy	Miller, Phyllis	Miller, Rachel	Miller, Richard	Miller, Robert
Miller, Robin	Miller, Ruth	Miller, Sandra	Miller, Sandy	Miller, Sara	Miller, Scott
Miller, Sean	Miller, Sergio	Miller, Shane	Miller, Sharon	Miller, Sherie	Miller, Sheryl
Miller, Sue	Miller, Susan	Miller, Susanna	Miller, Tabitha	Miller, Tami	Miller, Tim
Miller, Tim	Miller, Tom	Miller, Travis	Miller, Valerie	Miller, Victoria	Miller, Willia
Miller, William	Millet, Milagros	Millet, Stephanie	Millican, Diane	Millick, Monte	MILLIGAN, DON
Milligan, Susan	Million, Carey	Millione, Nancy	Millman, Kathleen	Millonig, Ann	Mills, Brenda
Mills, Chelsea	Mills, Constance	Mills, Dave	Mills, Erica	Mills, Jennifer	Mills, Karin
Mills, Martha Carol	mills, melissa	Mills, Mollie	Mills, Patrick	Mills, Rebecca	mills, shirley
Mills, Steve	millu, janis	Millu, Janis	Milne, Frances	Milne, Martha	Milo, Karen
Milonas, Nikolaos	milosevski, demijan	miloszewska, joanna	Miloszewska, Joanna	Milton, Laura	Mimeau, Pat
Mims, Ashley	Minacheili, Susanna	Minasi, Carol & Dom	Minch, kathleen	Minderman, Donna	Mindock, Terri
mineau, steve	Minert, Carolyn	MINHAS, TANBIR	Minich, Christopher	Minick, Audey	Minier, Steven
Mink, Daniel	Minkowitz, Charles	Minneman, Barbara	Minnes, Christopher	Minnick, Robert	Minniss, Regina
Minor, Ali	Minor, Angela	Minor, Charles	Minor, Shannon	Mintas, Loubov	minton, elza
Minton, Laren	Minturn, Frankie	Mintzlaff, Danielle	Mir, S	Mirabella, August	Mirabella, Judith
mirabella, kelly	Miracle, Cindy	miracle, Rhonda	MIRAGLIA, Michelina	Miragliotta, Tony	Miranda, Ángel
Miranda, Michelle	Miranda, Renee	Miranda, Vanja	Miranda, Yasmin	Mireault, Kathleen	Mireles, Joe L
Mireles, Kailey	Mirk, Walter	MIROSHNIKOVA, Inna	Mirth, Pamela	Mirzababaei, Jelvehnaz	Mischenko, Stephen

misd, enoni	Misek, Jolie	Mishaw, Robert	Mishelevich, Bonnie	Mishkan, Nicolette	Misicka, Ed
Misner, Jared	Misquez, Michael	misra, praveen	Misra, Sunil	Missimer Jr., Robert D.	Missler, Keary
Missman, Patricia	Mistretta, Stephanie	Mitchel, tracy	Mitchell, Alexandra	Mitchell, Amy	Mitchell, Barbara
Mitchell, Bonnie	Mitchell, Bonnie	Mitchell, Bryan	Mitchell, Carol	Mitchell, Courtney	Mitchell, Crystal
Mitchell, David	Mitchell, Dorothy	Mitchell, Edward	Mitchell, Gerard	Mitchell, Gordon	Mitchell, Janet
Mitchell, Jessica	Mitchell, Joanne	Mitchell, Jonathan	Mitchell, Julie	Mitchell, Karen	Mitchell, Kelly
mitchell, kenneth	Mitchell, Laureen	Mitchell, Lee	Mitchell, Linda	Mitchell, Margaret	Mitchell, Mark
Mitchell, Marti	Mitchell, Mary-Frances	mitchell, matt	Mitchell, Melissa	Mitchell, Michelle	Mitchell, Robert
MITCHELL, ROBIN	MITCHELL, ROI	Mitchell, Sidney	Mitchell, Sylvia	Mitchell, Wilhemena	Mitchell, William
mitchell, yolanda	Mitchell, Zephyr	Mitchum, Beth	Mithoefer, Ann	mitra, soma	Mitroff, Glenn
Mitros, Gosia	mitsch, ken	Mitsuda, Michael	Mitts, Yolanda	Mixon, Eugenia	MIXON, EUGENIA
Mixon, Julie	Mixson, Alicia	Miyashiro, Stephanie	Mizia, Al	Mizrahi, Barbara	Mizuguchi, Naoko
Moan, Terry	mobeckwilson, jane	Mobilio, Dawn	MOBILLE, JANET	Moch, Lauren	Moch, Madeline
Mochel, Robin	Mock, Carol	Mock, Kathy	Mock, Natalie	Mockus, Deimile	mocny, william
Moczarney, Cindy	Moczydlowski, Ann	Moderski, Kevin	Moehle, Carm	Moeller, Anne	Moeller, Michael
MOELLER, SUSAN	Moench, Belinda	Moenk, Jeanne	Moenk, Jeanne	Moeser, Rev. Donald	Moffa, Amanda
Moffo, Chris	Mogaburo Cid, Alfonso	Mogdam, Karmen	mogensen, ellen	Mogren, Dawn	Mohammad, John
Mohan, Lisa	Mohan, Monisha	Mohanamurali, KamniShobhika	Moher-McIver, Mary Louise	Mohler, Matt	Mohnasky, Corrine
Mohr, Carole	Mohr, Dale	Moir, Dollie	Moir, Madelatne	Moissant, Helen	Moitoret, Cathryn
Mok, Millicent	Mokra, Zuzana	Moksha, Nikki	Mol, Hanneke	Mol, Hanneke	Moldovan, Jeanette
Molgora, Bianca	Molina, Ana	Molina, Christine	Molina, Elisa	Molina, Nick	Molinario, Laura
Mollberg, W	Mollo, Elizabeth	Molloy, Cynthia	Molloy, Mark	Mol►nat, Jean	Momo, Alexia
Monaghan, Dina	Monaghan, Thelma	Monagna, Doris	Monahan, Carol	Monahan, Gregory	monahan, louise
Monahon, Peter Blaise	monclova, marilyn	Moncure, Janet	Monday, Denise	Mondazze, Gina	Mondragon, Michelle
Moneypenny, Mary	Monfils, Lora	monfort, Céline	MONGE, GABRIELA	monge, montse	Mongelli, Kevin
monger, Becky	Mongere, Anne	mongere, anne	Moniger, Mary	Monigold, Brian	Moniz, Laureen
Monjaras, Victor	monk, Paiton	Monk, Todd	Monkhouse, Susan	Monmouth County Audubon Society, Linda Mack, Trustee	Monnahan, Autumn
Monnet, Carolyn	Monroe, Al	Monroe, Derek	Monroe, James R	MONROE, LORA	Monseur, Jason
Monson, Ronald	monsura, victor	Montague, Don	Montague, Henry	Montague-Judd, Danielle	Montaine, Marietta
Montalbano, Chris	Montallana, Khrystle	Montana, Karen	Montane, Yenisel	Montanez, Marni	Montano, Brandi
Montano, Debbie	Montapert, Anthony	montapert, anthony	Monteleone, June	Montenegro, Christina	monterisi, mariangela
Montero, Deborah	Montes De Oca, Dayanara	Montes, Humberto	Montes, Jennifer	Montes, Mercedes	Mont-Eton, Elaine
Montgomery, Alan	Montgomery, Betty	Montgomery, Deborah	Montgomery, Jane	Montgomery, Pamela	Montie, Nisa
Montiforte, Frankie	montigny, robert	Montoro, Ernest	Montoya, Barbara	Montoya, Deidra	montoya, joan
Monzon, Christina	Mood, Christine	Moodie, Lynda	Moody, James	Moody, Jody	Moody, Monica
Moody, Peggy	Moody, Sally	Moody, Terry	Mook, Lisa	moon, bill	Moon, Diana
Moon, Joan	moon, marci	Moon, Rick	Mooncrest, Esther	Mooney, Albert	Mooney, Brian
Mooney, Gregory	Mooney, Linda	Mooney, Marianne	Mooney, Marina	Mooney, Sean	Moor, Sarah
moore jr, joseph	moore, alex	Moore, Alex	Moore, Amelia	Moore, Angela	Moore, Anita
moore, april	Moore, Ashley	Moore, Barbara	Moore, Caitlin	moore, Carrie Moore	Moore, Cheri
Moore, Chris	Moore, Cyndia	Moore, David	Moore, DE	Moore, Debbie	Moore, Debra
moore, felicity	Moore, Frank	Moore, Gene	moore, holli	Moore, J.C.	Moore, Janice
Moore, Jessica	Moore, Jubilith	Moore, Kathryn	Moore, Kelly	Moore, Kerry	Moore, Kim
Moore, Krishna	Moore, Laura	Moore, Leah	Moore, Linda	MOORE, LINDA	Moore, Linda
Moore, Lois	Moore, Lori	Moore, Lorraine	Moore, Malcolm	moore, maria	Moore, Marsha
Moore, Michael	moore, michele r	Moore, Molly	Moore, Nancy	Moore, Nancy	Moore, Pam
Moore, Pam	Moore, Paula	Moore, Robin	Moore, Rose	moore, s	Moore, Sandra
moore, sandy	Moore, Sharlee	Moore, Shelly	Moore, Sue	Moore, Tammy	moore, thomas
Moore, Timothy	Moore, Virgil	Moore, Virginia	Moore, Wallace	Moore, William	Moorehead, Shelly
Moorhead, Richard	Mooring, Cindy	moorman, claudia	Moos, Emily	Moosavi, parevash	Moosbruker, Jane
moose, mary etta	Mooty, Brandi	Mora, Juan	Mora, Kevin	Mora, Mali	mora, margaret

Mora, Marty	Mora, Sharon	Morado, Carolyn	Moraiti, Vicky	Morales, Alejandra	Morales, Bia
Morales, Brendalee	Morales, Christina	Morales, Henrietta	Morales, Karyn	Morales, Leo	Morales, Lisseth
Morales, Marco	Morales, Margaret	Morales, Michael	Morales, Molly	Morales, Nadia	Morales, Nancy
Morales, Naomi	morales, sondra	Moran, Annette	Moran, Frances	Moran, Frances	Moran, J J
Moran, James	Moran, Joe	Moran, Judy	Moran, Judy	Moran, Kathy	moran, m
Moran, Michelle	morander, kellyann	Morarre, Pam	Moras, Rebecca	Moraski, Kathleen	Moravek, Martha
Morckel, Pat	Mordan, Mary	Mordecai, Laura	Morehart, Carolyn	Morehouse, Doug	Moreira, Marlen
Moreira, Patricia	Moreira, Rui	Moreland, Andrew	moreland, susan	Morell, Mary	morelli, cynthia
Morelli, Laura	Morelli, Maria	Morello, Angelina	Morello, Phyl	Morelos, Sylvia Lydia	Moreno, Amy
Moreno, Eduardo	Moreno, Hope	Moreno, Michael	Moreno, Pamela	Moreno, Paul	Moreno, Tirso
Moreno, Trini	Morenovilla, Kaylen	Morey, Kat	Morey, Kathy	Morey, Margaret	morey, mark
MOREY, MARY	Morey, Patricia	Morey, Sandra	Morey, Susannah	Morfin, Martha	Morgan, Alexandra
Morgan, Alyssa	Morgan, Amy	Morgan, Betty	Morgan, Bill	Morgan, Celeste	morgan, cynthia
Morgan, Danielle	MORGAN, DEBORAH	Morgan, Edward	Morgan, gay	Morgan, Gwen	Morgan, Hanh
Morgan, Hilary	Morgan, Jan	Morgan, Joan	Morgan, Julia	Morgan, Julie	Morgan, Kathleenl
Morgan, Lilian	Morgan, Linda	Morgan, MA, C.L.	Morgan, Margie	Morgan, Melissa	Morgan, Michael
MORGAN, NANCY	Morgan, Nicole	Morgan, Patricia	Morgan, Rebecca	Morgan, Robert	Morgan, Sharon
Morgan, Starla	Morgan, Valerie	Morgano, Francine	Morgenstern, Bill	Morgenstern, Ira	Mori, Hiromichi
Mori, Vilia	Morin, Carla	Morin, Ellen	Morin, Erika	Morin, Lori	Morisd, Bob
Morita, Ray	Moritz, Dorothy	Morley, Audra	morley, eileen	Morley, Sandra	Morningstar, Samuel
Morningstar, Theresa	Moro, Maritza	Moroney, Bridgette	Morozov, Vladislav	Morphopoulos, Hercules D.	Morra, Frank
Morra, Mary Jo	Morrigan, Eryn	Morrill, Charles	Morrill, Kimberly	morris, ana	Morris, April
Morris, Bill	Morris, Brenda	Morris, Carla	morris, catherine	Morris, Claude	Morris, Dee
Morris, Don	Morris, Don	morris, donna	Morris, Ella	Morris, Florence	Morris, Gary
Morris, Gerald	Morris, Kathleen	Morris, Kevin	Morris, Linda	Morris, Louisa	Morris, Margaret
Morris, Maril	Morris, Mary	Morris, Megan	Morris, Melissa	Morris, Michelle	Morris, Nadine
Morris, Patty	Morris, Peg	Morris, Rock	Morris, Susan	Morris, Theresa	morris, vesna
Morrison, Abi	Morrison, Allan	Morrison, Anton	Morrison, Ariel	Morrison, Barb	Morrison, C
Morrison, Daniel	Morrison, Donald	Morrison, Jill	Morrison, Jo	Morrison, Kathy	Morrison, Kim
Morrison, Leslie	Morrison, Margaret	Morrison, Margaret	Morrison, Myrical	Morrissette, Denise	Morrissey, Janet
morrow, Brenda	Morrow, Chris	Morrow, Michelle	Morrow, Nichole	Morrow, Sarah	Morsberger, Grace
morse, dorenda	Morse, Jean	Morse, Lauren	Morse, Makenzie	Morse, Marie	Morse, Mary
Morse, Sherry	Morseth, Wendy	Mortada, Mohsin	Mortensen, John	Mortensen, Kathrine	Mortensen, Sandra
mortensen, suanne	Mortimer, Cliff	Mortimer, Saskia	Mortimer, Thomas	morton, kelli	Morton, Larry
Morton, Robert	Morton, Ruth	Morway, Sheila	Morytko, Steve	Moscato, Robert	Moscatt, Carlene
Moschopoulos, Charity	Moscowitz, Joyce	Moseley, Patricia	Mosely, Jonelle	Moser, Carylyn	Moser, Gregory
mosher, judy	Mosher, Kathryn	Mosher, Melissa	Mosher, Susan	Moshrefi, Ali	Moskowitz, Jacqueline
Mosqueda, Anna	Mosquera, Elizabeth	Moss, Brad	moss, colton	Moss, Joanne	Moss, Kenneth
moss, kenneth	Moss, LB	Moss, Mikasa	Moss, Russ	Mossor, Jill	most, Wendy
Mostov, Elizabeth	Moth, M.	Motia, Fuad	Motil, Cheryl	MOTT, AMBROSIA	mott, aniita
Mott, Diane	Mott, Donna	Motteler, Catherine	Motter, Marcina	Mottesheard, David	Motyl, Shirley
Mouginis, Tamyra	moulder, karen	Moulds, Wendy	Moulton, Wanda	Mount, Robert	Mountjoy, Jan
Mourad, Florence	Mourant, Amanda	Mousaw, Deanna	Moustakakis, Mike	mouton, janice	Moutray, Martha
Mouzourakis, Katherine	Mowen, Nick	Mower, Amy	mowery, angela	Mowles, George	moxnes, bjorn
Moy, Carolyn	Moy, Gene	Moy, Kristine	Moye, Joe	Moyed, Karole	Moyer, Amanda
Moyer, Diane	Moyer, Kenneth	Moyer, Kenneth	moyer, patrick	Moynihan, Ruth	Mozuch, Lee
Mraw, Renee	Mraz, Mike	Mrenna, Susan	MRKVICKA, EDWARD	MRKVICKA, EDWARD G.	Mrozek, Barbara
Mucci, Gregory	Mucci, Joseph	Mucha, Susan	Muchka, Jennifer	Mudd, Stephen	Mudge, Elizabeth
Muehlbauer, Katherine	Muehleis, Maria	Muehlenhard, Jason	Mueller, Cheryl	Mueller, Debi	Mueller, Heather
Mueller, joe	Mueller, Kari	Mueller, Kathrine	Mueller, Kathy	Mueller, Michael	Mueller, Robin
Muetz, Percy	Muetzel, Beth	Mugan-Vettori, Jessica	Mugge, John	Mugglestone, Lindsay	Mugrauer, Achim
Mugrauer, Heidi	mühl, rudolf	muhly, alexa	Muir, Dorothy	Muir, Joanne	Muir, Vicki

Muise, Charles	Mukahirn, Charlotte	Mukavetz, Marissa	mulas, enzo	Mulcare, James	Mulcare, James
Mulder, Joni	Mulder, Linda	Mulderig, Sheilagh	muldrow, john	Mulgrew, Sharon	Mulhall, Kathi
Mulhall, Marissa	Mulholland-Coyne, Maria	Mulhollen, Barry	Mulkey, Patti	mull, Allison	Mullane, Danny
mullaney, aileen	Mullaney, Sue	Mullen, Carrie	Mullen, Cindy	Mullen, Clinon	Mullen, Gregory
Mullen, Marilyn	Mullen, Moira	Mullen, Patti	Mullen, Valerie	Mullens, Kenneth	Mullens, Kirsten
Mullens, Martha	Muller, Abbe	Muller, Gerald	Muller, Maryanne	Muller, Rachel	muller, sue
mulligan, carol	Mulligan, Daniel	Mulligan, Deborah	Mulligan, Margaret	Mulligan, Margi	Mulligan, Robin
Mullin, Lorry	Mullineaux, Sandy	Mullins, Glenn	Mullins, Karen	Mullins, Missy	Mulloy, Deloris
Mulroney, Terry	Mulroy, SHELIA	Mulshine, Peter	mulugeta, victoria	Mulvany, Anna	Mulvey, Lori
Mulvey, Siobhan	Mumby, Robert	Mummery, Alexandra	Mummery, Donna	Munar, Dwayne	munday, sherrie
Munden, Jeni	Mundine, Jennifer	Mundy, Ken	Mundy, William	Mungenast, Tim	Mungle, Terri
Munhall, Amy	Muniz, Connie	Muniz, Denise	Munn, Melissa	Munoz, Alejandro	munoz, efrain
Munoz, G	Munoz, Jacquie	Munoz, Julie	munoz, Kat	Munoz, Lilibeth	munoz, miriem
Munoz, Stephanie	Munro, Diane	Munro, Sara	Munroe, Kimberly	Munsey, Ernestine	Munshower, Kate
Muntel, Chris	Muntner, Linda	munyal, rachana	munyer, john	mur, Gos	Murakami, Maki
Muraki, Debbie	Muramaru, Lynn	Murar, Carla	Muratori, Marina	Murawski, Larry	Murawski, Theresa
Murcia, Diana	Murdoch Johnson, D Tuff &	Murdoch, Sarah	Murdock, Jasmine	Murdock, Katherine	Murdock, Lauren
Murdock-Zvonchenko, Jeanne	Murgia, Federica	Muriglan, Anna	Murillo, Christina	Murillo, Xiomara	Murman, Anita
Murphey, Carolyn M	Murphey, James	Murphy Larronde, Suzanne	Murphy, Amanda	Murphy, Anna	Murphy, Cassie
Murphy, Cindy	murphy, cindy	Murphy, Claire	murphy, cynthia	Murphy, Dacia	Murphy, danielle
Murphy, Deborah	Murphy, Denise	Murphy, Erin	Murphy, Janelle	Murphy, Jenifer	Murphy, JoAnn
Murphy, Judy	murphy, karen	MURPHY, KELLE	Murphy, Linda	Murphy, Lisa	Murphy, Liz
Murphy, Lorraine	Murphy, Luke	murphy, m.s.	murphy, margaret	Murphy, Mary	Murphy, Maureen
Murphy, Meredith	Murphy, Michael	Murphy, Michael	Murphy, Stephanie	Murphy, Sue	Murphy, Theresa
Murphy, Tim	Murphy, Timothy	Murphy, Wayne	Murphy-Burke, Kerrin	Murray, Amber	murray, barbara
Murray, Beth	Murray, Catherine	Murray, Cathy	murray, clare	Murray, Cristy	Murray, Donna
Murray, Jayme	Murray, John	Murray, John	Murray, julie	Murray, Kristen	Murray, Margaret
Murray, Marilee	Murray, Marty	Murray, Michael	Murray, Michelle	Murray, Nancy	Murray, Rosemary
Murray, Sandra	Murray, Sandra	murray, sandy	Murray, Sarah	Murray, Seanna	Murray, Susanne
Murray, Sybil	Murray, Tahirah	Murray, Tom	Mursch, Jeanne	Murtagh, Joan	Musacchio, Robert
Muscato, Natalie	musche' & richards, ann & alan	Muschert, Glenn	Musco, Aileen	Muse, Dyan	Muse, Philip
Musetti, Jane	Mushkin, Casey	Musialowski, Monique	Musk, Sue	Muslar, Jade	Musser, Ellyn
Musser, Kathy	Musson, Larry	Mustain, Elizabeth	Mutagyera, Juanita	Muzychka, Rebecca	Muzzin, Ruth Stoner
Mybusiness, Melanie	Myers, Ashley	myers, barbara	myers, charles	Myers, Chris	Myers, David
Myers, Harry	Myers, Jean	Myers, Jeanette	Myers, Jeffery	MYERS, JODY	Myers, Keli
Myers, Michaela	Myers, Miranda	Myers, Pamela	Myers, Sandie	Myers, Sherry	Myers, Sonya
Myers, Ursula	Myers, Vickie	Myhan, Sheryl	Myhre, Dennis	Mylius, Jerry	Myller, Elyse
Mylott, Sharon	myoung, marie	Myrzaly, Bermet	Mysak, Lani	Myskowski, Katherine	mysliwiec, molly
N, K	N, L	N, Reba	N, T	Nabors, Layton	Nabors, Robin
Naccarato, Frank	Nachazel, Jane	Nadeau, Jane	Nadeau, Jeanette	Nadel, Barbara	Nadelman, Fred
Nader, Susan	Nadolski, Jessica	Nadolski, John	Nadreau, Gerald	Nadreau, Patricia	Nafziger, Nikki
Nagaj, Eleina	Nagel, Clinton	Nagel, Herbert	Nagels, Hilde	Nagle, Michael	Nagodavithana, Renuka D
nagy, cristina	Nagy, Diana	Nagy, Karen	Nagy, Marilee	Nagy, mary Jo	Nagy, The Revs. Dr.
Nagyfy, Desiree	Nahigian, Joy	Nahill, Brad	Naidich, Sandra	Naidu, Soumya	Naik, Kalyani
Naiman, Karen	naiman, michael	Naiman, Shoshanah	najafi, sami	Najimudeen, Abdul	Nakabuye, Dora
Nakai, David	Nakakihara, Karen	Nakakihara, Karen	nakama, christy	Nakata, James	Nakhle, Valerie
Nalbandian, Judy	Nam, S	Nancarrow, Josh	Nance, Catherine	Nance, Chelsi	Nance, Rebecca
Nance, Stephan	Nance, Susan	Nanfito, Mary	Nap, Ash	Napier, Leesa	NAPOLEON, DARALYNN
Napoles, Maybi	Napoli, Diane	Napolitano, Joseph	Napolitano, Marie	napp, Tracy	Nappi, Glenn
Naqvi, Syed	Naranjo, Martha	Naranjo, Rose	Narayan, Pavitra	Narayan, Vishal	Narbona, Beatrice

Narbutovskih, Anna	Narbutovskih, Paula	Narcisse, April	Nardell, Jason	Narizny, Susan	Narveson, Robert
Narvios, Tem	Naser, Rheema	Nash, Arlene	Nash, Edith	Nash, Eli	Nash, Ellen
Nash, Felicia	nash, juanita	Nash, Kenneth	Nash, Mary	nasser, isabel	Natale, Joseph
Natalie, Yillah	NATH, Nathalie	Nathan, Janice	Nathan, Seth	Nathan, Shelley	Natsis, Sofia
Nau, Robert	Naumenko, Katerina	Navarrete, Patty	Navarro, Claudia	Navarro, Debbie	Navarro, Eleanor
Navarro, Stephanie	Nave, Kelly	Naveed Siddique, Mehreen	Navew, Diane	Navran, Willliam	Navratil, Nicole
Nawas, Claudia	Naya, Di	Naylor, Brent	Naylor, Sherri	nazario, Alexis	Nazzaro, Alan
Nazzaro, Patricia	Ndreu Tonuzi spc, Miss Servetk	Neal, Charles R.	Neal, Dianne	Neal, Kathy	Neal, Ursula
Neale, Laura	Nealis, Tammy	Nealon, Sandra	Neamon, Mary	Nearing, Sue	Neaton, Christi
Neave, Jane	Nebel, Bob	Nebolsine, Cynthia	Neckermann, Jenn	Nedeau, E. James	Nedelco, Cassandra
Nederlof, Peggy	Needham, Lynn	Needham, Margaret	Neeley, Evagene	Neely, Bruce	Neely, Judith
Neering, Len	Nefedova, Elena	Neff, Beatrice	Neff, Dorothy	Neff, Grace	Neff, Grace
Nefsky, Melvyn	Negawo, Gadissa	Negrey, Tanya	Negri, Angela	Negri, Jane	negron, kiara
Neifert, Courtney	Neihart, Janet	Neill, Judy	Neill, Laurie	Neill, Murray	Neill, Terri
Neiman, Jordan	neimo, ginger	Neinast, Darrell	Neis, Derek	Neitz, Michael	Neitzel, Robert
Neitzke, Christine	Neligan, Michele	Nelis, Maria	Nell, Lori	Nelmida, Jennifer	Nelms, Michelle
Nelsen, Cheryl	Nelson, Antonia	Nelson, Beatrice	Nelson, Berri	Nelson, Brad	Nelson, Briana
Nelson, Bruce	Nelson, Carol	Nelson, Cecelia	Nelson, Claire	Nelson, David	Nelson, Dawn
Nelson, Debbie	Nelson, Donna	Nelson, Doug	Nelson, Doug	Nelson, Dylan	NELSON, EMILY
Nelson, Eric and Dottie	Nelson, Ian	Nelson, Jacqueline	nelson, jan	Nelson, Janet	Nelson, Jeannie
Nelson, Jim	Nelson, John	Nelson, John	Nelson, Joseph	Nelson, Joy	nelson, joyce
Nelson, Julie	Nelson, K	Nelson, Katherine	Nelson, Kristen	Nelson, LB	Nelson, Linda
Nelson, Linda	Nelson, Margaret	Nelson, Marie	Nelson, Mark	Nelson, Morgan	Nelson, Nanci
Nelson, Nanci	Nelson, Nicole	Nelson, Phyllis	Nelson, Rick	Nelson, Sally	Nelson, Sherron
Nelson, Steven	Nelson, Todd	nelson, tracy	Nelson-Caviglia, Adrianne	Nelson-Kimball, Pamela	nemec, molly
Nemecheck, Harold	Nemeth, Cipra	Nemeth, Melissa	Nepf, Ruthe	Nepstad, Sandra	Neptune, Mary
Nerger, Robert	Nero, Timothy	Nerwick, Randall	Nesbit, Edwin	Nesbitt, Lynda	Nesbitt, Mary Alice
Ness, Laurie	Ness-Lira, Carole	Nest, John	Neste, George	Neste, Lisa	Nestel, Charlene
Nesteruk, Valerie	Netter, Peter	Netti, Steve	Nettler, Maxwell	Netzer, Mary	Neubauer, Carolyn
Neuendorf, Mary	Neuman, Loretta	Neuman, Michael	Neumann, Deborah	Neumann, Mary Ann	Neumann, Phill & Margaret
Neumann, Roger	Neus Bradley, Cyndi	Neuschel, Peter	Nevard, Marie	Neviarovich, Darya	Neville, Paula
Newbegin, Gisela	Newberg, Cheryl	Newbern, Peter	newberry, betty	Newberry, Carla	Newbry, Dakota
Newcomb, Jodi	Newcomb, Kathy	newcomb, rachel	Newcomb, Shirley	Newcombe, Debra	Newcombe, Patrick
Newell, Barrie	Newell, David	newell, linda	Newell, Lucas	Newgent, Susan	Newhouse, Sandra
newick, Cyndee	Newman, B	Newman, Connie	Newman, Donna	Newman, Hilary	Newman, Jacqueline
Newman, Joe	Newman, Judith	newman, karen	Newman, Kathleen	Newman, Kathy	Newman, Lyn
Newman, Ricki	Newman, Suzanne	Newsham, Kristen	Newsom, Deirdre	Newsom, Ricky	Newsome, Lindsay
Newton, Barby	Newton, Barby	Newton, David	Newton, Jessica	Newton, Kim	Newton, Mary Kay
NEWTON, PAMELA	Newton, Paula	Nez, David	nez, tilda	Ngo, Anh	NGUYEN, HANG
Nguyen, Merry	Nguyen, Nichole	NGUYEN, PETERTHIEU	NGUYEN, THIEU	Nguyen, Tracy	NGUYEN, TUAN
NIAL, CHRISTOPHER	Niblack, Anna	Niccoli, Mary	Nicholas, Anthea	Nicholas, Betty	Nicholas, Jill
Nicholas, Kathleen	Nicholas, Kristine	Nicholas, Martin	Nichols, Ambrey	Nichols, Carmen	Nichols, Gloria
Nichols, Harlene	Nichols, Jason	Nichols, Joshua	Nichols, Judy	Nichols, Julie	Nichols, KN
Nichols, Kristen	Nichols, Margaret	Nichols, Paul	Nichols, Shirley	Nicholson, Allan	Nicholson, Carol
nicholson, cheryl	Nicholson, Eedy	Nicholson, Jane	NICHOLSON, JOANNE	Nicholson, Mike	Nicholson, Penny
Nicholson, Rich	Nicholson, Ruth	Nicholson, Sabrina	Nicholson, Tiffany	Nickels, Kitty	Nickle, Bonnie
Nickles, Carolyn	Nicodemo, Lora	Nicodemus, Sharon	nicol, beth	Nicol, Marilyn	Nicolai, Nicola
Nicolaidis, Judith	Nicole, Alexandra	Nicole, Ashley	Nicoletto, Linda	Nicolls, Arlen	Nicolopoulos, Nicole
Nicosia, Michael	nicoud, john	Nidiffer, Brandon	Niebuhr, Christine	Nied, Scott	Niederman, Terry
Nields, David	Nielsen, Lila	Nielsen, Melody	Nielsen, Mike	Nielsen, Pamela	Nielsen2, Karen

Nielson, Richard	Nieman, Kimberly	Nieman, Sandra	Niemann, Laura	Niemeyer, Mark	Niemeyer, Wendy
niemeyer, wendy	Nienaber, Rachel	Niendorf, John	Niernberger Muhar, Jana Mariposa	Niernberger, Trix	Nieto, Eujenia
Nieves III, José	Nieves, Adriana	nieves, diana	Nieves, Maria	Nieves, Maylene	Nieves, Robert
Nightingale, Janet	nightingale, jill	Nikifor, Peggy	Nikkel, John	Nikkel, William	Nikolaides, Costa
Nikolenko, Kate	niksic, joyce	Nilasena, Nancy	niles, amanda	NILES, JOAN	Niles, Pamela
Nillo, Chirstina	Nilon, Quinn	Nilsson, Derinda	Nimitz, John	Nimmo, Jennifer	Nino, Jose
Nishimuta, Christine	Niskanen, David	Nitishin, Lawrence	Nitsch, Jessica M-E	Nitz, Jennifer	NITZBERG, BERNA
Nix, Alexis	Nix, Heather	Nix, Jon	Nix, Teri	Nixon, Andrea	Nixon, Brenda
Nixon, Debby	Nixon, Ian	Nixon, Maureen	Nixon, Nancy	Nizam, Rafa	Noa, Rachael
nobel, regula	Noble, Enrique	Noble, Genicarmen	Noble, Linda	Noble, Robert	Noble, Thomas
NOBLE, W.F.	Noboa, Sofia	Nocera, Lulu	Noddin, Judith	Noderer, Lilly	Nodurft, Shane
Nodurft, Shane	Nodzak, Beverly	Noel, Alana	Noel, ALISA	Noel, kelly	Noel, Letitia
noel, pj	Noel, Stardust	Noeldner, Paul	Noeller, Suzanne	NoForwardsPlease, Catrin	Noga, Ginny
Noggle, Tanya	Nogotona, Elizabeth	Nohava, Charles	Nohava, Charles	noimbie, joy	Nolan, Jacob
Nolan, James	Nolan, Janice	Nolan, Nancy	Nolan, Stephen	nolan, thomas	Noland, Daniel
Nolen, Karen	Nolen, Nancy	Noll, Michale	Noller, marianne	Nolte, Gwen	Nolte, JoAnn
Nolter, Robert	Nolting, Corina	Nolton, Beth	noonan, ck	Noorani, rashid	Noordyk, James
Noori, Laila	Nordby, Pat	Nordeen, Margaret	Nordgren, Sandra	Nordstrom, Brian	Nordstrom, Cynthia
Nordstrom, Kelly	Noren, Iris	Norlander, Peter	Norman, Christine	Norman, Jaime	Norman, Kristina
Norman, Melissa	Norman, Melissa	Norman, Samantha	Nornhold, Susan E	Norris, Fred	Norris, Jenny
Norris, Linda	Norris, Lori	Norris, Ronday	Norris, Teri	North, Bonnie	North, Diana
North, Ellen	North, Gloria	North, Ketti	North, Liz	North, Maureen	North, Susan
north, susan	Northcott, Keri	Norton, Adrienne	Norton, Ashley	Norton, Chela	Norton, Eva
Norton, Gina	norton, john	Norton, Laurel	Norup, Paul	Norwood, Susan	Norwood, Virginie
Nosnik, David	Nossaman, Loui	Notestine, Jim	Nothelfer, Spring	Noto, Richard	Nottingham, Holly
nottingham, Lois	Noursi, Paul	Novack, Aaron	Novack, Kate	NOVAK, ANNE	novak, connie
Novak, Deanna	Novak, j	Novak, Raya	Novak, Rebecca	Novas, Jerry	Novelle, Renee
Novero, Cecilia	Novgrod, Logan	Novi, Jon	Novick, Phyllis	Novicki, Andrea	Novikova, Natalya
Novinson, john	Novkov, Russell	Novoa, Marisol	novoa, michelle	Novotny, Jan	Nowak, Carol
Nowak, Joseph	Nowak, Joseph	Nowak, Mary Lou	Nowak, PeggyJo	Nowakowski, Irene	Nowe, Connie
Nowell, Donna	Nowicki, Ann	Nowicki, Susan	Nowlin, Madison	nowzari, sara	noyes, chris
Nuccio, Sue	Nuckols, Janice	Nudel, Bella	Nuesch, Raymond	Nugent, James	Null, Ciry
Null, Melodie	Null, Michele	null, null	Nunes, Deborah	Nunes, Robert	Nunes, Sharmaine
nunez, amado	Nunez, Anabel	Nunez, Kim	Nunez, Leonardo	nunez, michelle	Nunez, P
Nunez, quenia	Nunez, Ryan	nunez, stephanie	nunn, crystal	Nunnelley, Robert	Nunnery, Tom
nurk, t	Nusbaum, William	Nuss, Morgan	Nutini, Michael	Nutley, Andrea	Nutt, Anna
Nutting, Travis	Nye, Howard	nygard, Christin	Nygren, Vicki	nylander, susanna	nylen, e
Nylen, Nancy	nystrom, warren	O Mahony, Maria	O, T	O., Dan	O., Jack
O.Neill, Cara	O`Brien, Philip	O`Brien, Robert	O`Leary, Jennifer	oakes, laura	Oakes, Suzanne
Oakford, Renee	Oakland, Steve	Oakley, Jane	Oaks, Judy	Oaks, Phoebe	Oates, Patricia
Oba, Peggy	Obajtek, Lynn	O'Bara, Carina	Obarski, Kathleen	Obeid, Robert	Obenauf, Steven
Obenchain, Helen	Oberbruner, Miriam	Oberle, K.	Oberlin, Rebecca	O'Berry, Donna	OBerry, Susan
Oberstadt, Rebecca	Oberste, David	Obert, Leonard	Obert, Margaret	Obleada, Alvin	Obolsky, Lenny
Oborn, Roger	Obr, Brooks	O'Brian, Melissa	O'Brien, Brie	O'Brien, Dennis	O'Brien, Kathy
OBrien, Kelly	O'Brien, Maria	O'Brien, Mary	O'Brien, Mary	O'Brien, Melissa	O'Brien, Michael
obrien, pat	OBrien, Robert	OBrien, Sean	obrien, Terri	O'Brien, William	O'Brien-Mullins, Pat
O'Bryan, charles	O'bryan, Rick	OByrne, Cynthia	obyrne, paul	O'Callaghan, Judith	Ocasio, Alfredo
Ocasio, Margaret	OCEAN, CHRIS	Oceans Santana, Paulo	Oceguera, Julie	ocejo, maria	Och, Evelyn
Ochs, Sue	Ockert, Cindy	OConnell, Dan	oconnell, gloria	oconnell, joan	O'Connell, Kathleen
O'Connell, Kimberley	O'Connell, Michael	O'Connor, Angelita	Oconnor, Daniel	oconnor, daniel	O'Connor, Edward
O'Connor, Kathleen	OConnor, M	O'Connor, Mary	O'Connor, Mary Jo	O'Connor, Patricia	oconnor, peggy
oconnor, shari	O'Connor, Terry	O'Crotty, Marcus	O'Crotty, Sheryyl	Ocskai, Barbara	Oda, John
Oda, John	oddi, lidero	Oddo, Michele	ODear, Elizabeth	Odell, Courtney	Odell, Gloria

Odell, Lacey	O'Dell, Patrick	Odelman, Carl	Odin, Danielle	Odoardi, Cheryl	Odom, Barbara
Odom, Cassandra	Odom, Kathleen	odoms, elvin	odonnell, anthony	O'Donnell, Deanne	O'Donnell, Deanne
O'Donnell, Kelly	Odonnell, Laura	O'Donnell, Mary	O'Donnell, Sasha	O'Donnell, Victoria	O'Dowd, Patricia
Oehmke, Richard	oehrle, elizabeth	Oelkers, Yvonne	oeller, s	Oeltjen, Jennifer	OEN, NEO
Oerke Jr, Carl	Oertel, Christine	oestreich, sandy	Officer, Humane	Officer, Michael	O'Flynn, Kerry
O'Fraley, Nancy	Ofstad, Liz	Ogburn, Catherine	Ogden, Geoffrey	Ogella, Edith	Oggiono, Nanette
Ogilvie, Dave	Ogilvie, Marsha	Ogilvie, Robert	Ogle, Deanna	Ogle, Eva	Ogle, Jesse
Oglesby, December	Ogonowski, Joel	O'grady, Shawn	OGrady, Tom	Ogren, Linda	Ogren, Lorrie
O'Hagan, Kerry	ohaher, mickey	O'Haire, Hugh	O'Halloran, Christy	O'halloran, Katie	Ohana, Samuel
Ohania, Sosseh	O'Hara, Darrell	O'Hara, Kathy	O'Hara, Stephanie	OHara, Tiffany	Ohara, Tom
Ohara, Vincent	Ohbeg, Erik	OHEARN, PAUL	O'Hearn, Rita	Ohland, Andreas	Ohlendorf, Carol
Ohler, Keith	ohlinger, m	Ohlson, Brandi	Ohlson, Lindarae	Ohm, P	Okada, Josh
Okalani, Shaina	o'keefe, kevin	O'Keefe, Kim	O'Keefe, Lauren O'Keefe	Okes, Irene	Oki, Mari
Okimoto, C	Oklander, Svetlana	Okone, Brandon	okrzesik, james	Okubo, Audrey	Okun, Cassandra
Okun, Joan	Olachia, Ramon	Olafsdottir, Ruth	Olascoaga, Judith	Olawale, Mary	Olcott, Keith
Oldakowski, Irene	oldaugh, dennis	Oldfield, Deanie	Oldham, Jan	Oldham, Kathleen	Oldham, Susan
O'Leary Carey, Cathy	O'LEARY, DAN	OLeary, Helen	O'leary, Jennifer	O'Leary, Terri	Olenjack, Michael
Oleon, Patti	Oleson, Wendy	Oleyar, Maureen	Oleynikov, Karina	Olguin, Terry	Oliva, Richard
Oliva, Victor	Olivares, Engerlina	oliveira, caroline	Oliveira, Elizabeth	Oliveira, Mariana	Oliveira, Roberto
Oliver, Betty	Oliver, Bonnie	Oliver, Deborah	Oliver, Debra	Oliver, Donna	Oliver, Helen
oliver, hermina	Oliver, Janet	Oliver, Janet	Oliver, Jennifer	Oliver, Jenny	Oliver, Jerry
Oliver, Lauren	Oliver, Leesa	oliver, mary	Oliver, Patricia	Oliver, Summer	Olivier, Larry
Ollar, Jamie	Ollendick Jr, Leonard	Ollerton, Justina	Olmstead, Wendy	Olmsted, Jean	Olmsted, Leanna
O'Loughlin, Heather	O'Loughlin, Leslie	O'Loughlin, Mary	Olsen, Andrea	Olsen, Cathleen	Olsen, Corey E.
olsen, denis	Olsen, Donna	Olsen, Elinore	Olsen, Jean	Olsen, Maedie	Olsen, Meg
Olsen, Rebecca	Olsen, Robert	Olsen, Suzanne	Olson, Brett	Olson, Bruce	Olson, Cheryl
Olson, Chris	Olson, Dawn	Olson, Diane	Olson, Donald	Olson, Eliza	Olson, Isabelle
Olson, Jeffery	Olson, Joseph&Carol	Olson, L	Olson, Larry	Olson, Leah	Olson, Marc
Olson, Matt	Olson, Nance	Olson, Nina	Olson, Renie	olson, ron	Olson, Sheryl
Olson, Susan	Olson, Susan	Olson, Traci	Olson, Victoria	Olson-Knowles, Karen	Olveda, Marlene
Om, Wendy	O'Malley, Casey	Oman, J.W.	Omana, Amelia	Omans, Jeff	OMara, Beverly
Omartian, Lisa	O'Masta, Janice	O'Meara, Maureen	Onan, Elizabeth	O'Nan, Elizabeth	O'Nan, Kathleen
Onaya, Mary Harumi	Onda, Eleen	Onder, Debi	Ondrus, Sarah	Ondus, Bernadette	O'Neal, Maureen
O'Neal, Maureen	O'Neal, Sandy	O'Neil, Dina	ONeil, Patricia	O'Neil, Rory and Stacy	O'Neill, carol
O'Neill, Christine	oneill, den	Oneill, Erin	ONeill, Kevin	O'Neill, Laura	ONeill, Liz
O'Neill, Robyn	ONeill, Valjean	O'Neil-Ross, Peggy	Onesti, Frances	Ong, Ning Su	Ono, Lory
Onslow, Debbie	Openshaw, Carol	Openshaw, Renee	Opio, Desiree	Oppenheimer, Lina	Oppenhuizen, Kathy
O'Prey, Cookie	Oquendo, jaime	O'Quinn, Blake	O'Quinn, Molly	Orabona, Andrea	orange, samantha
Orbach, Sharon	Orcutt, Sabrina	Oreana, Chris	O'Rear, Tena	Orefice, Stephen	Orengo-McFarlane, Michelle
Oresky, Alan	Orgel, Linda	Originales, Joe	Orlandello, John P.	Orlando, Rebecca	Orlinski, Patricia
Orloski, Kathy	Orlow, Janet	Orlow, Mark	orlowsky, wo	ormandy, justine	Orme, Katy
Ornelas, Claudia	Ornelas, Sal	Orner, Karen	Orner, Valerie	Orner, Valerie	orobitg i della, Maria José
Orona, Erica	Orons, Nancy	orosco, jennifer	O'Rourke, Dawn	O'Rourke, Thomas	O'Rove, Archa
Orozco, Angela	Orozco, Nancy	Orr, Andrea	Orr, Jerry	Orr, Katharine	Orr, Linda
Orr, M. Lou	Orr, Noel	Orr, Robert	Orsillo, Ann	Ortani, Brita	Ortega, Diego
ORTEGA, JOHN	Ortega, Julio	ortega, laura	ortega, marlene	Ortego, Sybil	Orth, Valerie
Ortiz, Alex	Ortiz, Allyson	Ortiz, Daisy	Ortiz, Digna	Ortiz, Frank	Ortiz, Keren
Ortiz, Lola	Ortiz, Maritza	Ortiz, Robert	Ortiz, Robert	Ortiz, Ruben	Ortiz, Yvonne
Ortiz-Williams, Sophia	ortner, mary	Orton, Nikkie	Orvin, Allison	Orvis, Marian	Osada, Susan
Osborn, Amy	osborn, dixie	Osborn, Nancy	Osborn, Sophie	osborne, Esther	Osborne, Glenn
Osborne, Hannah	Osborne, Leslie	Osborne, Rebekka	Osbourn, John	Oscar, Gadzhimuradov	Oscar, Sam
Oscarsito, Ben	osei, nkechi	osepchuk, caitlin	Oser, Wendy	O'Shea, Andrea	O'Shea, Carolyn
O'Shea, Kathie	Oshiro, Leimamo	osie, andria	Osland, Michele	Osler, Revis	Osmon, Anja

Osomachain-Price, Emily	Osorio, Katty	Osowski, Maryjo	Ospina, Monica	Ossana, Diana	Osselmann, Kara
Ostaszewski, John	Ostby, Phyllis	Oste-Alexander, Pia	O'Steen, Dorothea	OSteen, Julie	Osten, Irene
Oster, Aryn	Oster, Lauren	Osterlie, Lynne	Ostler, Theo	Ostlie, Susan	Ostoich, Julie
Ostolaza, Meilani	Ostopoff, Christine	Ostrec, Mirella	ostrom, valerie	Ostrow, Hillary	Ostrowski, Angie
Ostrowski, Janet	osullivan, claire	Oswald, Susan	Oszurko, Jolanta	Ota, John	Othrow, Marge
Otillio, Patricia	Otiswatkins, Claudette	O'Toole, Annmarie	O'Toole, Cindy	Otremba, Emily	Otstott, Cathy
Ott, Eric	ott, natalie	Ott, Wayne	Ottenstein, Betb	Otterbach, Margit	Ottilio, Kathryn
Otto, Joe	ou, jamin	Oua►, Dalila	Oubrayrie, Fabienne	Ouellette, Ingrid	Ouellette, Joanne
Ouellette, Marcia	Ouellette, Tracy	Oulman, Lynne	ouren, lynn	Ouren, Richard	ourlian, kimberly
Oustry, Emmanuelle	ovalle, Jacki	Overbeck, Barbara J.B.	Overdorff, Barbara	Overin, Wendy	Overlock, Kathryn
Overman, Judith	Overstreet, Amanda	Overstreet, Rosemarie	Overton, Sean	overton, wendy	Overturf, Sharon
Owen, Cheryl	Owen, Craig	Owen, Doug	Owen, Jacquelyn	Owen, Jarry	Owen, Wendie
Owens, Beverley	Owens, Breanna	Owens, Diana	Owens, Donna	owens, james	Owens, jen
Owens, Robert	Owens, Sharon	Owens, Theresa	Owens, Tim	Owens, Tyler	Owens, victoria
Owl, John	Owl, White	Oxenreider, Betty	Oxley, Rhonda	Oxley, Valerie	Oxman, Sharen
Ozatay, Elva	Ozatay, Sakip	Ozbolt, Dawn	ozenberger, shirley	OZEROFF, ELAINA	Ozias, Julie
ozkan, dogan	Ozkan, Dogan	ozkok, cem	Ozmina, Martin	Ozuna, Michele	Ozuna, Sarah
ozzello, paula	P, Anitra	P, B	p, m	P, Roy	P, Rozalyn
P, Sofia	P., Cindy	Paalanen, Laura	pabon, jaime	Pabst, Virginia	Pace, Cortney
Pace, Dale	Pace, Katelyn	Pace, Lisa	Pacey, Gordon	Pacheco, Carla	Pacheco, Esmeralda
Pacheco, Kathleen	Pacheco, Wendy Wai'ala	Pachomski, Amanda	Pack, Brandie	Pack, Pamela	Pack, Sara
Packman, Zola	Paddock, April	Paddock, Joseph	Paden, Donald	Padgett, Tony	Padilla, Anna
Padilla, Denise	Padilla, Dina	Padilla, Gabriel	Padilla, Kevin	Padilla, Teresa	Padilla-Montufar, Robert
Padow, Jacquie	Paes, Zoila	paez, maggie	Pafford, Jill	Pagan, Brenda	Pagan, Julia
Pagano, Michael	Page Jr, Lawrence	Page, Jennifer	Page, Melissa	page, michele	Page, Peggy
Pagel, Andrew	Pagel, Michele	PAGLIERO, MARY	Paglione, LuAnne	Pagnozzi, Vanna	Pagsolingan, Czora
Pahel, Nicole	Pahinui, Ruth	Pahl, Aleta	Paige, Cecilia	Paige, Gina	Paige, Martha
Paige, Rebecca	Pailodze, Liana	Pain, Sharon	Paine, Michelle	Painter, Barrett	Painter, Joanne
Paisley, Janet	Paisley, Lorna	Paiva, Márcia	Paiz, Leah	Paizante, Lucimar	Pal, Marina
PALACIO, GLORIA	Palacios, Alexis	Palacky, Tami	Palacky, Tami	Palau, Fleur	PALAZZINI, LOUIS
Paleias, Linda	Palenik, Gus	Palestina, Briana	Palfalvi, Lori	Palfi, Kimberly	Palimeri, Kathleen
Palin, Jerry	palkovic, sandy	Palladine, Michelle	Pallanes, Beatriz	paller, lou	Palm, Elsie
PALM, R	Palma, Sulma	Palmeira, Heather	Palmer, Anlee	Palmer, Carol	Palmer, Emily
Palmer, Janet	Palmer, Janine	Palmer, Libby	Palmer, Lynne	Palmer, Mark	Palmer, Melissa
Palmer, Michelle	Palmer, Paul	Palmer, R. Brent	Palmer, Ralph	Palmer, Rebecca	Palmer, Shayna
Palmer, Veronica	Palmquist, Ingrid	Palmquist, Wendy	Paloma, Tama	Palomino, Brita	Palozie, Karen
Paltin, Sharon	Paluch, Kim	Palumbo III, Vincenzo	Palumbo, Gloria	Palumbo, Jean	Palumbo, Julieann
Palumbo, Virginia	Pambuccian, Corina	pampaloni, carol	Pamperin, Joanne	pan, pinkyjain	Panagiotidou, Eleni
Panarelli, Kimberly	Panayi, Christopher	Panchagnula, Bharadwaj	Panciera, Jeffrey	Pancner, Robert	pandolfini, alan
Pandolfo, Michael	Paned, Maria	Panek, George	Panek, Suzanne	Panetta, Lou	Pang, Angela
pang, Jeannie	Pang, Naomi	Pangaro, David	Paniagua, Macaria	Paniagua, Rosiris	Pankhurst, John
Pann, Robert	Pannaman, Stanley	Pannell, Bonnie	Panoulias, Diana	Pantel, Jesus	Panter, Rich
Pantoja, Alma	Pantukhoff, Jeff	Paolinelli, Rosemarie	paolucci, lillian	Paone, Gerald	Papa, Michael
Papa, Mike	Papaccio, Janie	papageorgiou, cleo	papain, Elaine	PAPALEO, DEBORAH	PAPALEO, LOis
Papandrea, John	Papapanayotou, Jerry	papazova, valentina	Papia, Cynthia	papierman, sheldon	Papp, Rick
Pappalardo, Massimo	Pappas, Betty	Papraniku, Isabel	Paprocki, Ann Marie	Papscun, Alan	Papworth, Nick
paquette, david	Paquette, Jonah	Par, Des	Parada, Brenda	Parada, Pablo	Paradis, Bettie
Paradis, Kate	Paradise, Brian	Paradise, Brian	Parakina, Mancala	Paralkar, Shilpa	Parbhoo, Erich
Parcell, Ruth	Parcevaux, Christine	Parcou, Julien kaven	Pardew, Isabelle	Pardi, Marco	Pardinek, Mary
Pardo, Cynthia	Pardue, Betty Lou	Parente, Anne	Parente, Donna	Parfenova, Marina	parfrey, juliet
Pariani, Margurite	Parikh, Anand	Paris, JoAnn	PARIS, JOANNE	Parise, Chris	Parish, Anita
Park, Clara	Park, Jeannie	park, jon	Park, T. Peter	Parker III, Gordon	Parker Medeiros, Leslie
Parker, Adeline	Parker, Amy	Parker, Barbara	Parker, Blake	Parker, Brad	parker, carol

parker, carole	Parker, Catherine-Nevil	Parker, Charlotte	Parker, Christopher	Parker, Christopher	Parker, Corey
Parker, Corrina	Parker, David	Parker, Deborah	Parker, Dixie	Parker, Doug and Jan	Parker, Doug and Jan
Parker, Edith	Parker, Edward	Parker, Elizabeth	Parker, Eric	Parker, Erika	Parker, Francesca
parker, g	Parker, Graham	parker, greg	Parker, James	Parker, Janice	Parker, Jim
Parker, Joan	Parker, Joseph	Parker, Julie	Parker, Karen	Parker, Keith	Parker, Ky
Parker, Lance	Parker, Lea	Parker, Lisa	Parker, Louise	Parker, Michael	Parker, Nancy
Parker, Patricia	Parker, Patricia	Parker, Robert	Parker, Robin	Parker, Shelley	Parker, Tara
Parker, Vicki	Parker, Wayne	PARKER, WILLIAM	Parkerson, Britney	Parkhurst, Cathy	Parkins, April
Parkins, Janet	Parkinson, Gerald	Parks, Alex	Parks, Carol	Parks, Cristal	Parks, Kevin
parks, linda	Parks, Noreen	Parks, Rick	Parks, Warren	Parmar, Priya	Parmelee, Allison
Parmenter, Annmarie	parmigiani, mirella	Parodi, Mary Lynn	Parr, Julia	parr, marianne	Parr, Mark
Parr, Sarah	Parra, Hector	Parra, Jairo	Parramore, Jennifer	parravicini, marco	Parrillo, Pauline
Parrino, M.L.	Parrish, Elizabeth	Parrish, Jessica	Parrish, M. S.	Parrish, Nicole	Parrish, Roberta
parrish, Rose	Parrish, Shellie	parrish, susan	Parrone, Cindy	Parry, Sandra	Parry, Tina
Parsee, Willie	Parsell, Sue	Parshall, Maxine	Parshall, Priscilla	Parshall, Sandra	Parshall, Sharon
Parsley, Adina	Parsley, Bobbi Jo	Parsons, Emma	Parsons, James	Parsons, Kathleen	Parsons, Maria
Parsons, Michael	Parsons, Michelle	Parsons, Nancy	Parsons, Peggy	Parsons, Raeshawn	Parsons, Rebecca
Parsons, Ron	Parsons, Sara	Partida, Alondra	Partin, Nancy	Partridge, Cecilia	Partridge, Richard
Partridge, Virginia	Partyka, Barbara	Parus, Christine	Parzick, Anne	Pasche, Terrie	Pascual, Pat
Pasha, Anas	Pashman, Dave	Pasik, Luanne	Paske, Randall	Pasker, Michele	Pasko, Peggy
Paskowitz, Nancy	paskucka, sylwia	Pasqua, John	pasqua, john	Pasqualini, Lucia	Pasquinelli, Dorothy
Pasquini, Catherine	Passerini, Dawn	Passerini, Gabrielle	Passmore, Judith	Paster, Laurel	pastor, ella
Pastorino, Bondy	PASTORINO, GINO	Pastorkovich, Michael	Pastula, Adam	Pastuszak, Patricia	patalan, jim
patch, a	Pate, Amanda	Pate, George	Pate, George	patel, Ankita	Patel, Bina
patel, jamshed	patel, jason	patel, sarosh	pateman, lynne	Patkochis, Chris	patlan, Holly
Patnode, Diane	Patounas, Ann	Patra, Lynn	Patri, Mano	patricia, Goodin	patrick, duane
patrick, juanita	Patrick, Lynn	patrick, nan	Patrick, Richanna	Patrick, Sher	Patrick, Stephen
Patrick, Susan	Patrolia, Kate	patrono, connie	patrono, connie	Patsiga, Lynn	Patten, Robin
Patterson, Carri	Patterson, Chelci	Patterson, Cynthia	patterson, delsha	Patterson, Douglas	Patterson, Eugenia A.
Patterson, Jane	Patterson, Joanie	Patterson, Jodi	Patterson, Julie	Patterson, katherine	Patterson, Katherine
Patterson, Martina	Patterson, Robert	Patterson, Robin	patterson, steven	Patteson, Patricia	patti, ray
Patti, Vincent J.	Patton, David and Therese	Patton, Gary	Patton, Lori	Patton, Loy	Patton, Mark
Patton, Monica	Patton, Scott	patty, shannon	Patumanoan, Nancy	Paugh, Johnna	Paul, Charlene
Paul, Douglas	Paul, Jessica	Paul, Les	paul, lisa	Paul, Logan	Paul, Michele
Paul, Nathan	Paul, Raylene	Paul, tammy	Pauley, June	Pauley, Marcia	Pauley, Terry
Pauley, Thomas	Pauling, Lynda	Paulk, Brayden	Paull, Dennis	Paull, Rachel	Paulochik, james
Paulos, Judith	paulsen, alan	Paulsen, Sarah	Paulson, Alan	Paulson, Brenda	Paulson, Carol
Paulson, Elizabeth	Paulson, Karen	Paulson, Laura	Paulson, Melony	Paulson, Sheila	Pavcovich, Michelle
Pavel, Kristin	Pavietre, Morrigna	Pavlosky, Sol	pavon, mila	Pavone, Sharon	Pavone, Terry
Pawley, Lisa	Paxson, Elizabeth	Paxson, Michele	Paxton, G	Paxton, Jennifer	paxton, michael
Pay Pay, Ericka	Payne, Aaron	Payne, Alice	Payne, Bradley	Payne, Danielle	Payne, Geneine
Payne, Grace	Payne, Harland	Payne, Jan	Payne, Richard A	Payne, Rick	Payne, William
payson, sam	payton, dc	Payton, Fay	Paz, Barbara	Paz, Deborah	pazdernik, loretta
Pazdro, Kristen	Peabody, Melissa	Peace, Jessica	Peace, Tom	peach, pat	Peacock, Bruce
Peacock, Nancy	Peak, shirley	Peake, Andrea	Peake, Beverly	Peaks, Alex	Peara, Sonia
Pearce Sr, John	Pearce, Claudia	Pearce, Julie	Pearce, Susan	Pearl, Diane	Pearlman, Gail
Pearsall, John	Pearson, Angela	Pearson, Laurie	Pearson, Lynda-Russ	Pearson, Sandra	Pearson, Selena
pearson, tia	Pearthree, Pippa	Peary, William	Pease, Diane	Pease, Diane	Pease, Jasmeen
Pease, Linda	Pease, Linda	Pease, Shea	Peasley, Malinda	Peavey, Janna	pecha, richard
pecjna, terry	Peck II, Charles	peck, amanda	Peck, Ann	Peck, Denise	Peck, Jessica
Peck, Linda	Peck, Louisa	peck, m	Peck, Pamela	Peck, Therese	Peckham, Theresa
Pecoraro, Jim	Pecsok, Karen	Peddicord, Ken	Peddy, Jan	Pedersen, Bailey	Pedersen, Denise
Pedersen, Lorraine	Pedersen, Michael	Pederslie, Sharon	Pederson, Karina	Pedler, Stephanie	pedley, shane
Pedreschi, Carola	Pedrozo, Isabel	Pedulla, Elizabeth	Peel, Roberta	Peel, Thomas	Peeler, Carlos

Peeples, Kelly	Peeples, Michelle	Peer, Jamie	Peerman, Dean	Peet, Norma	Pegg, Helen
Peha, David	Pehar, Dubravka	péhoré, sylvie	Pehrson, Elizabeth	Pei, Liane	Peiffer, Pat
Peinado, Claudia	Peirce, Christopher	Peirce, Susan	Peisher, Ashley	Pelch, Rosalie	Pele, Tiffany
Pelka, U	Pell, Kevin	pellegrini, jamie	Pellerito, Catherine	Pelletier, Deborah	Pelletier, Marie
pelletier, susan	Pellett, Gary	Peltekian, Viken	peltier, nita	Peltier, Sean	Pelto, James
Pelton, Drew	Peltzer, Alan	Pemberton, Cheryl	Pemberton, Donna	Pembrook, Kelsey	Pemrick, Ellen
Pena, Christine	Pena, Danica	Pena, Julia Paloma	Pena, Kaitlin	Pena, Maggie	Pena, Margaret
Pena, Stephani	Pena, Suzanne	penaherrera, roberto	penczek, frank	Pendas, Ignacio	Pendergast, Betsy
Pendleton, Elizabeth	Pendleton, Rick	Pendragon, Nimue	penel, renee	pengson, elizabeth	Penilla, Claudia
Penley Sr, Garfield	Penn, Elisabeth	Penn, Janie	Penn, Michael	Penn, Nicole	Pennacchini, Angela
Pennington, Armando	Pennington, Carol	Pennington, Greg	Pennock, William	Penola, Joseph	Penrod, Dolores
Pentek, Suzanne	pentico, g	Pentzke, Bozena	peoples, jonna	Peoples, Laura	pepe, karen
Pepera, Peter	Pepin, Dan	pepper, virginia	Pepperdine, Susan	Peppin, Marilyn	Peppler, Terese
Perakis, Stephen	Perakis, Steve	Perakslis, Margaret	Perales, alice	Peralta, AElizabeth	Peralta, Dominic
Peralta, Josefina	Peranio-Paz, Giana	Peranio-Paz, Giana	Peraza, Yvonne	perconti, tom	Percy, Amanda
percy, patrick	Perczak, Kamila	Perdelwitz, Barbara	Perdios, Daniel	Perdoni, Paula	Perdue, Don
Perdue, Suzanne	Pereira, Rosangela	Perenich, Theresa	perera, fia	Peretsky, Leslie	Perez Lopez, Jena
Perez, Abel	Perez, Arielle	Perez, Armando	perez, elise	Perez, Frank	Perez, George
perez, holland	Perez, Irma	Perez, JC	Perez, Jessica	Perez, Kevin	Perez, Linda
Perez, Lisette	Perez, Marcia	Perez, Mary Margaret	Perez, Milagros	Perez, Myra	perez, steven
Perez, Tricia	Perez, Victoria	Perez, Winnie	Perez, Yinet	Perez-Reilly, Elizabeth	perin, silvana
Perinchief, Jana	Perk, David	Perkins, Akankha	Perkins, Chris	Perkins, David	Perkins, David
Perkins, gale	Perkins, Hannah	Perkins, Jayme	Perkins, Jean	Perkins, Katherine	Perkins, Kathy
Perkins, Linda	Perkins, Lori	Perkins, Marie	Perkins, Meschell	Perkins, Nancy	Perkins, Rosemary
Perkins, stacey	PERKS, JARED	Perla, Nooshin	Perlman, Bill	Perlmutter, Heather	Pernot, Susan
peroche, marie	Perona, Eliah	Perona, Marilyn	Perras, Brandon	Perras, Kristen	Perreault, Andrea
Perrecone, Jody	Perrero, Deborah	Perrette, Thomas	Perricelli, Claire	Perrigo, Valerie	Perrimoore, Richard
perrin, jeff	perron, Jessica	Perron, Patricia	Perrotta, Lisa	Perrotta, Nicholas	Perry III, Arthur
Perry, Anna	Perry, Beth	Perry, Billy	Perry, Bruce	Perry, Christine	Perry, Ed
PERRY, JAMES	Perry, JaZelle	Perry, Joi	Perry, Judy	Perry, Kris	Perry, Lee
PERRY, LINDA	Perry, Linda	Perry, Michiko	Perry, Nancy	Perry, Pamela	Perry, Randall
Perry, Robin	perry, Roxy	Perry, Sue	Perry, Veronica	Perryman, Marsha	Persaud, Shivani
Persky, Jerry	person, christel	Person, Lynn	Person, Wayne	Persons, Charlotte	Pert, Pamela
Peruzzi, Giorgia	Perzynski, Jeff	Peskin, Laura	Pesko, Pat	Pestov, Mark	peteinaraki, maria
Peter, Judith	Peterke, Tina	Peterlin, Barbara	petermann, bob	Petermann, Hans	Petermann, Janet
Peters, Cheryl	Peters, Christine	Peters, Connie	Peters, Emily	Peters, Jeanne	Peters, Jeff
Peters, Lisa	Peters, Lydia	Peters, Margaret	Peters, Matt	Peters, Melissa	Peters, Melody
Peters, Nancy	peters, richard	Peters, Robert	Peters, Sarah	Peters, Stephenie	Peters, Susan
Peters, Suzanne	Peters, Thom	Peters, Vicki	Peters, Yvonne	Petersen, Adam	Petersen, Alice
Petersen, Doreen	Petersen, Elsa	Petersen, Jane	Petersen, Linda	Petersen, Pamela	Petersen, Rebecca
Petersen, Robert	Petersen, Shirley	Petersen, Stefan	Petersman, Mary Jo	Peterson, Alan	Peterson, Alex
Peterson, Allan	Peterson, April	Peterson, Brenda	Peterson, C	Peterson, C. G.	Peterson, Carl
Peterson, Carol	Peterson, Carol	Peterson, Chris	Peterson, Dale	Peterson, David	Peterson, David
Peterson, Dennis	Peterson, Donald	Peterson, Elizabeth	PETERSON, ELOISE	Peterson, Eva	Peterson, Janet
Peterson, Janet	Peterson, Jenny	Peterson, John	Peterson, Julie	Peterson, Karen	Peterson, Karen
Peterson, Kelly	Peterson, Kimmie	Peterson, Kristen	peterson, kristin	Peterson, Kyle	Peterson, Leslie
Peterson, Linda	Peterson, Linda	Peterson, Luke	Peterson, Marji	Peterson, Melissa	Peterson, Rachel
Peterson, Rich	Peterson, Richard	peterson, ron	Peterson, Sandra and Roger	Peterson, Thomas	Peterson, Tracey
Peterson, Tyson	Peterson, W	Peterson, W.	Peterson, William	Peterson-Stout, Amy	Peterson-Wheeler, Betty
petitt, amber	Petkie, Ron	Petkiewicz, Jim	petracchi, silvia	Petraitis, julianna	Petrak, Thanice
Petrakis, Dean	Petrarca, Sandy	Petras, Carrington	Petras, Dorothy	Petrasy, Marie	petrathelis, liz
Petrayskas, Diana	Petrichevich, Renee	Petrick, Candy	Petrie, Nelson	Petrilla, Jack	Petrilli, Elizabeth
Petrillo, Andrea	Petrillo, Diane	Petrisko, George	Petro, Pat	petrokubi, anne	Petrone, Cheryl
Petroni, John	Petrose, Michael	Petrovich, Aleksandr	Petruccelli, Paul	Petrus, Veronica	Petruzzi, Cheryl

Petsco, John	Petterson, Stacey	Pettett, Tammy	Pettine, Beverly	Pettis, Carolyn	Pettit, Emma
Pettus, Jamie L	Pettway, Beverly	PETTY, DENISE	Petty, Gina	Petty, Joan	Petty, Linda
Petzak, Jamaka	Petzold, Gregory	Petzold, Jennifer	Peverell, Marcy	Pevide, Janice	Peyser, Victoria
Peyton, Jim	Peyton, Windy	Pezzino, Susan	Pezzo, Rose	Pezzoti, Debra	Pfaffman, Amy
Pfannenstiel Rodriguez, Christopher	Pfeifer, Nezka	Pfeiffer, James	Pfeiffer, Michelle	Pfeiffer, Pat	Pfeiffer-Rios, Jan
Pfeil, Michael	Pfeil, Mimi	Pfeninger, Brianna	Pfersich, John	Pfingston, Emma	Pflaumer, Judith
Pflug, Carl	Pflug, Valerie	Pflugh, Melissa	Pflugrad, Linda	Pham, Chi	Pham, Hai
Pham, John	Pham, Kelly	Pham, Ricxie	Pham, Truc	Phan, Quynh-Chi	Phares, Carolyn
Phariss, Loni	Phayer, Alberta	Phelan, Linda	Phelps, Adrian	Phelps, Jennifer	phelps, julie
Phelps, Marin	Phelps, Robert	Phenicie, Terrie	Phifer, Larry	Philbin, Alison	PHILBIN, MARILYN
Philemon, Shannon	PHILIP, CECIL	Philipps, doris	Philips-Adair, Jacquelyn	phillians, shawna	Phillips, Alicia
Phillips, Anita	Phillips, Anne	Phillips, Anne	Phillips, Annie	Phillips, Bob	Phillips, Cheryl
Phillips, Christopher	Phillips, Craig And Nancy	Phillips, Debbie	Phillips, Deborah	Phillips, DeeAnn	Phillips, Douglas
phillips, ed	Phillips, Elizabeth	Phillips, Ellen	Phillips, Evie	Phillips, Felicia	Phillips, George
Phillips, Jacob	Phillips, Jan	Phillips, Jeffrey	Phillips, Jesse	Phillips, Joe	Phillips, Joseph
Phillips, Karen	Phillips, Lauren	phillips, m	Phillips, Margaret	Phillips, Mary	Phillips, Mary Ann
Phillips, Monica	Phillips, Nancy	Phillips, Nancy	Phillips, Pam	Phillips, Richard	Phillips, Richard & Ethel
Phillips, Robyn	Phillips, Rochelle	Phillips, Rochelle	phillips, rose	Phillips, Rosemary	phillips, s
Phillips, Sarah	Phillips, Scot	Phillips, Sharon	Phillips, Shirley	phillips, weslie	Philp, Kristen
Phinney, Ellen	phipps, jillphipps	Phipps, Kendra	Phipps, Lillian	PHIPPS, MARIA	Phipps, Meredith
Phipps, Rachael	Phlegar, Katherine	Photinos, Bonny	Phreaner, Robert	Pianalto, Frederick	piansky, jen
Piasecka, Ewa	Piasecki, Shantel	Piaskiewicz, Mark	Piatak, Meghan	piattoly, nicole	Piazza, Joseph
Piazza, Randall	Picard, Donald	Picard, Mary	Picard, Nathalie	Picchetti, Gloria	picchietti, paula
Picciallo, Rebecca	Piccione, Louisa	piccolin, marguerite	Piche', Joel	pichini, susan	pichlová, markéta
Picinska, Malgorzata	Pick, Thomad	Pickell, Bobbie	Pickell, Jeff	Pickell, Julie	Picken, Cy
Picker, Harvey	Picker, Seth	Pickering, Elsie	Pickering, Karen	PICKERING-CORTINA, NANCY	Pickert, Cindy Marie
Pickett, Kathy	Pickett, Sherri	Pickles, Penny	pico, rebecca	Pidal, Raquel	PIDGEON, SANDY E
Piecuch, Joe	Piekarski, Joseph	Piekarski, Virginia	Pieniazek, Annette	PIEPENBURG, Leon	Pierce, Betty
Pierce, Elin	Pierce, James	Pierce, Joy	Pierce, Judy	Pierce, Kathryn	pierce, kristine
Pierce, Nancy	Pierce, Patrick	Pierce, Stephanie	Pierce, Tanya	Piere, M	Pieretti, Faith
Pierpont, Pam	Pierre, Beatrice	Pierre, CHALAUD	Pierre, Linda	Pierre-Louis, Jemmy	Pierri, Frank
Pierson, Barb	Pierson, Cheri	Pierson, James	Pierson, Julie	pierson, michelle	Pierson, Neilia
Pierucki, Gatha	Piestrak, Bonnie	Pietersen, Teresa	Pietras, Rose Marie	Pietromartire, Judi	Pietrowski-Ciullo, Evelyn
Pietrusiak, Rick	Pietrzak, Darlene	Pietrzyk, Edward	Pietsch, Mona	pigford, terri	pigford, terri
Pikaart, Marilyn	Pike, Evette	pike, john	Pike, Marilyn	pilawski, sandra	Pilger, Carrie
Pilger, Shirley Jean	Pilkenton, Buck	Pilkington, Kathy	Pillsbury, Rebecca	Pimental, Laurie	Pimentel, Elizabeth
Pimentel, Elvin	Pina, Evelio	Pina, Evelio	pincepoche, eric	Pindroh, Gina	Pineda, Annalee
pineda, faye	Piner, Chelsea	Piner, Sharon	Pinette, Allison	Pingel, Alva	pinilla, luis f
Pinjala, Ravi	pinkard, karen	Pinkerton, Anne	Pinkham, Linda	Pino García, Flora	Pinque, Meryl
Pinque, Meryl	Pinsky, Susan	Pinsof, Robin	Pint, Rebecca	Pinto, Ashley	Pinto, Erica
pinto, mary	Pinto, Vasco	Piotrowski, Nancy Ann	Pipa, Ron	Piper, Janna	Piper, Laurie
Pipitone-Oliveto, Cecilia	Pipkin, Donna	Pippin, Christina	Pippin-Emanuel, Patricia	Piraino, Janet M.	Piri, Arly
Pirog, Gerald	Pirot, Jenny	Pirzadeh, Bijan	Pisarcik Connolly, Laurie	Piscitello, Tiffany	Pistorius, Shelley
Pistorius, Shelley	Pitchford, Jayne	Pitkin, Kandy	pitre, caldwell	Pittell, Jodi	Pittenger, Alexis
Pittenger, Paul	Pittluck, Denise	Pittluck, Richard	Pittman, Cornelia	Pittman, Jennifer	Pittman, Sierra
Pittmann, Sally	Pitts, Ginny	pitts, marian	pitts, patti	Pitts, Teresa	Pitzel, Diane
Piven, Jerry	Piven, Jerry	Piza, Mimi	Pizarro, Claudia	pizarro, sharon	Pizmoht, Joanne
Pizzoferrato, Teresa	Placone, Richard	Plaehn, Dave	Plaetzer, Jacqueline	Plage, Carolyn	Plakke, Linda

Plancich, Richard	Plant, Jody	Plant, Leah	Plant, Tangie	Plasky, Paula	plasky, roy
plata, Luisa	Platt, Christel	Platt, Heather	Platt, Luke	Plautz, Robert	Plauzoles, Lu
plazola, arcelia	Pleasants, Catherine	pleasants, jaden	Plemer, Marisa	Plennert, Joyce	Plesser, Carole
Plested, Ian	Plimpton, Lease	Plishka, Debra	Plishka, Debra	Plocar, Sandra	Plocher, Lou
Plociniak, John	Plodek, Jeanette	Ploderer, Lilien	ploof, karen	PLOTKIN, ADELE	Plover, Egret
Plowes, Beth	Plowman, Shirley	Plucinski, Wanda	Plumb, Sonja	Plumb, SuSanne	Plumer, Nancy
Plumier, Lea	Plummer, Amy	Plummer, Chloe	Plummer, Gary	Plummer, Pam	Plunkett, Dora
Pluta, Joseph	Poad, Veronica	Poarch, Taneka	Poche, Brieaux	Pochop, Barbara	Pockell, Sheila
Poder, David	Podewell, Roger	Podgorski, Kathryn	Podraza, Roseann	Podsakoff, David	Poe, Ashley
Poe, Paula	Poehlman, Linda	Poetney, Thomas	Pogancev, Tara	pogel, g	Poggi, Pietro
Pogiatzoglou, Tania	Pohopin Beitel, Kathy	Poikail, Sam	Poindexter, Pamela	Poinsett, Lori	Pointeau, Christine
Poisson, B Lesley	Poisson, Jean	Poist, Ellen	Poitras, PASCAL	pol, jay	pol, joanne
Polak, ML	Polak, Virginia	Polanco, Edgar R.	Poland, Ty	Polansky, Debra	Polcyn, Dorene
Polczynski, Jamie	Polekoff, Aimee	Polelonema, Yvonne	Polesky, Alice	Poletti, Carla	Polick, Melissa
Poligari, Kinnera	Poliquin, Wylene	Politis, Lee	Politzer, Andrew	Polk, Nora	Polk, S J
Pollack, Michael	Pollak, Jeannie	Pollard, Al	pollard, charlene	Pollard, Lisbeth	Pollard, Patricia
Pollard, Samantha	Pollei, Lisa	Polletta, kathy	Polley, Elizabeth	Polley, JoAnn	Pollinzi, Rebecca
Pollock, Diana	Pollock, Robert and Jean	Pollock, Sarah	Pollock-Leite, Jeri	Polo, Hector	Polomis, Ted
Polsky, Diana	Polvadore, Brenden	Polya, Lance	Polychronis, Jan	Pomerance, Brenda	Pomerantz, Fred
Pomianowski, Leah	Pomies, Jackie	Pomper, Elizabeth	Ponce, Dora	Ponce, Salomon	Pond, Rose
Ponder, Angela	Ponder, Ashleigh	Ponessa, Ramona	Pongallo, Dan	Ponisciak, Joseph	Ponsford, Sharon
Pontes, Sandra	Ponto, Lynn	PONZINI, DIANA	Poock, Patty	pool, Heather	Pool, Leslie
Pool, Roxann	Pool, Ted	poole, cindy	Poole, Diane	Poole, Judy	Poole, Kathleen
Poole, Patricia	Poole, Patricia	Poole, Sherry	Poole, Tymira	Pooler, Carole	Pooler, Ida
Poolos, Hazel	Pope, Alexine	Pope, Jolene	Pope, Jonnie	Pope, Kat	Pope, Pauline
Poplawsky, Al	Popolizio, Carlo	Popov, Marina	Popowsky, Kathleen	Popp, Jennifer	Popp, Marcia
pops, george	Porcelli, Virva	Porcher, Janeene	Porosoff, Lauren	Porpiglia, Tom	Porras, Yendrick
Porreca, Audrey	Porrello, C	Porro, Marcelino	port, clee	Port, M	Portas, Diane
Porter MD, Jon	Porter, Anne	Porter, Bailee	Porter, Bernadette	Porter, Cody	Porter, Erica
porter, jackie	Porter, Jennifer	porter, jessie	Porter, Joelle	Porter, Lillian	Porter, Lynne
porter, mark	Porter, NM	Porter, Ted	Porter, Warren	Porterfield, Holly	Porterfield, Seth
Portillo, Brandon	Portillo, Gloria	portillo, joan	Portis, Martina	Portko, Sandra	Portnoy, Michael
Portwood, Diana	Posada, Herberth	Posch, Robert	Poschlod, Marta	Posey, Becky	Posey, Bonnie
Posin, Freda	Poske, Jo Ann	poskiene, lina	Pospisal, Deborah	Poss, Joan	Post, Bloom
Post, Heath	Postert, Susan	postma, wendi	Postnikova, Maria	Potocnik, David	potratz, barb
Potrc, Karin	Potter, Alya	Potter, Cathy	Potter, Gabriele	Potter, Lorraine	Potter, Shirl
Potter-Smith, M	Potthoff, Heather	Pottinger, Hans	Pottratz, Mary Beth	Potts, Stephen	Potts, Victoria
Potvin, Dave	Pough, Carol	Poulsen, Barbara	Poulson, Judi	Poulson, Thomas	pouns, gilli
Poupeau, Chantal	Poureetezadi, Fataun	powell, amy	Powell, Ashley	Powell, Audrey	powell, cathy
Powell, Cindy	Powell, D	Powell, David	Powell, Deborah	Powell, Deborah	Powell, Janice
Powell, Jennifer	Powell, Jon	Powell, Julie	Powell, Lance	Powell, Larry	Powell, Lisa
Powell, Mary	Powell, Peggy	Powell, Sarah	Powell, Shirley	Powell, Stephen	Powell, Susan
powell, Tiffany	Power, Pam	Power, Robyn	power, stephanie	Powers RN, Maureen	Powers, Bev-Sue
Powers, Cynthia	Powers, Helen	powers, James	POWERS, JOHN	Powers, Mary Lou	powers, nina
Powers, V	Powers-Jaeger, Pat	Powley, Carol	Poxon, Judith	Pozzini, Michelle	Pradarits, Elisa
pradella, bridget	Prado, Jannette	Prairie, Sharon	Praprotnik, John	Prasad, Smita	Prata, Stacey
Prater, Joy	Prater, Pamela	prather, Carl	Pratt, Anna	Pratt, Carol	pratt, debbi
pratt, liberty	Pratt, Megan	Pratt, Stephanie	Pratt, Theodora	Praus, Shañnah	Preaseau, Brooke
prebeg, joe	Predis, Susan	Preevost, Virginia	Prefontaine, Joan	pregun, suzanne	Preli, John
Prellwitz, John	Premo, Candice	Pressley, Doris	Preston, Apryl	Preston, Dale	Preston, Dr. J.
Preston, Joseph	Preston, Robin	Presutti, Sal	Preswood, Charlotte	Prete, Yvonne	Pretlow, Theresa
Pretseille, David	Prettel, Stacie	Prettyman, Cathy	Preuss, Ginnie	Prexl, Esther	Prexl, Esther
preziosi, gina	Pribble, Beth	price, barbara	Price, Betsy	Price, Bonnie	Price, Danielle
Price, Debbie	Price, Elisabeth	Price, Elisabeth	Price, Gary	Price, Gordon	price, harley
Price, Judi	price, june	Price, Kristal	Price, Lauren	Price, Lynn	Price, Mara

Price, Marie	Price, Mary	Price, R.M.	Price, Rhenda	Price, Rosa	Price, Sonja
Price, Stacey	Price-Maloy, Ellen	Pricer, Donald	Prichard, Debbie	pridgen, thomas	Priebe, Hannah
priebe, jennifer	Priebe, Rick	Priest, Amy	priest, myisha	priestley, jacob	Prifti, Lee Ann
prim, brooke	Prime, Mark	Prince, Andrew	Prince, Linda	Prince, Steven	Princenthal, Lindsay
Pringle, Catherine	Pringle, Heidi	Pringle, Janice	priola, George	Prisby, Karen	PRITCHARD, ALVERA
Pritchard, Bobbi	Pritchard, Elizabeth	Pritchard, Jennifer	Pritchard, Lori	Pritchard, Mary	Pritchard, Patricia
Pritchard, Vicki	Pritchett, Isabelle	pritt, lisa	Privett, Donald	Prizito, Tara	Probeck, Linda
Probert, Barbara	Probes, Lawrence	Probes, Lawrence	Proce, Loretta	procick, stephanie	Procida, Camille
Proctor, Carolyn	Proctor, Dawn	Proctor, Johnny	Proctor, LaVina	Proctor, William	Proebsting, William
Proenca, Elisabete	Proffitt, Robert	Proffitt, Sterling & Louise	Proffitt, Susan	Proietta, Susan	Proimos, Lynne
prokop, joe	Prokop, Shannon	Prokop-Heitman, Janice	Pronto, Jeb	Proper, Diana	Prosperie, Johnnie
Prosser, Tilda	Prost, Anne	Prostler, Laura	Protasov, Sergey	prough, kim	Provance, D. S.
Provident, Lisa	provo, corinne	Provol, Cary	Provost, Christina	Provost, Clifford	Provost, Lin
Prudden, Elizabeth	Pruegel, Stefanie	Pruess, Alisha	Pruett, Julie	Prugar, Catherine	Pruitt, Jessica
Pruitt, Patricia	Pruitt, Patricia	Pruitte, James	Pruneau, PauleAnne	prychka, wendy	pryde, sharon
Pryor, Kelly	Pryor, Steven	Pryor, Suzanne	Prystauk, William	Przestrzelski, Stephanie	Przybylski, Laurel
przybysz, Slowomir & Irene	Pszanka, James	Puaoi, Richard	Puca, Robert	pucci, joshua	Puccini, Electra
Puccio, Carmella	Puckett, Mary	Puckett, Neil	Puckett, Sara	Puentes, Felena	Puerta, Jeanne
Puette, Carol	Puffenberger, Mary	Pugglias, Tiffany	Pugh, Jim	Puglia, Daniela	pugliese, chris
Pugliese, Maria	Puglisi, Dena	Pulai, Annabella	Pulikas, Toni	Pullan, Esther	Pullano, Linda
Pullen, Clarissa	Pullen, Sher	Pulleva, Evelina	Pulley, Dana	Pulliam, Shelley	Pumphrey, Eugene
Punneo, Sheryll	Puntasecca, Juanita	Puntch, Ann	Purbrick-Illek, Sally	Purcell, Gary	purdham, robyn
Purdy, Shelley	Purfürst, Hildegard	Purgason, Regina	purkar, nasima	Purnell, Til	Purnell, Til
Pursell, Jaid	Purtell, Robert	Purucker, Susanna	Purves, Alex	Purviance, Paula	Purvis, Stephanie
Puryear, G Gray	Puspita, Ivi Diana	Puthoff, Gary & Marla	Putman, Anna	Putman, Holly	Putnam, Alethea
Putnam, Christine	Putnam, Lib	Puttick, Nicole	Putzier, Cindy	Puza, A	Puzio, Michael
Pyka, Dr. Gudrun	Pyles, Alexis	Pyles, David	pynn, doug	pyott, joanne	Pysher, Paul
q, izzy	Qira, Meliha	Quackenbush, Natasha	Quagliaroli, Sharon	Quaintance, Joel	Quan, Valerie
quandt, carol	Quaritius, Karen	Quarrick, Robert	Quarton, Gail	Queen, Wynne	Querner, Kathleen
Querze, Susan	Quesada, JoAnn	Quest, Wendi	Quevedo, Carla	Quezada, Marin	Quiambao, Johnson
Quiatt, Peggy	Quick, Holly	Quick, Jennifer	Quick, Justin	Quigg, Catherine	Quigg, Joan
Quigley, B	Quigley, Caitlin	quigley, peggy	Quig-Terry, Susan	Quilenderino, Yvonne	Quiles, Aida
Quiles, Evalyn	Quilichini, Magdalena	Quillen, York	Quilligan, deb	Quindo, Marilyn	Quinlan, Anne
Quinlan, Carmela	Quinlan, Vona	Quinn D.O.M., Hannah	Quinn, Ciara	Quinn, Karen	Quinn, Kimberly
Quinn, Lois	Quinn, Maureen	Quinn, Melynda	Quinn, Nola	Quinn, Patricia	Quinn, Sherry
Quinn, Tom	Quinn, Tracey	Quinn, Zoe	Quinones, Carla	Quinones, Ruth	Quintana, Angela
Quintana, Pilar	Quintana, Pilar	Quintana, Robert	Quintanilla, Fawn	Quintanilla, Laura	quintanilla, maria
quintanillas, Larry	Quintero, Joann	Quirarte, Kelsey	Quiris, Veronica	Quiroga, Silvia	Quitoriano, Beverly
Quizhpi, Tiana	Quon, Marjorie	Qureshi, Pamela	Qureshi, Shaheena	Quyyum, Natasha	R, D
R, Dina	R, Jesse	R, M	R, Malti	R, Sisilie	R. Castillo, Myriam
R., Andrew	R., S.	Ra, Orchid	Raab, Frances	Raag, Reetta	Raasch, Carolyn
Raasch, Dorothy	Rabinowitz, Rebecca	Rabinowitz, Stuart	Rabne, Jill	Rabon, Joyce	Rabon, Lyndsey
Rabow, Harli	Raby, Jack	Raby, Stephen	Raccio, Karen	Race, Margery	Rachman, Belinda
Rackley, Kristen	Racz, Lisa	Radanovich, Dominic Joseph	Radbod, Yasmin	Radcliffe, Brian	Radecki, Ruth
Rader, D	Rader, Kevin	RADEY, SUSAN	Radford, Etha	Radford, Jeannette	Radley, Ann
RADMANOVICH, MILO	Rado, Cathy	Radoccia, Judy	Radojcic, Vedran	Radtke, Amanda	Rae, Beverly
Rae, John	Rae, M	Raebeck, Wendy	Raedel-Powers, Michaela	Rafey, Larry	Rafferty, Heather
Rafferty, Paul	Raffety, Bruce	rafiqi, marie	raforth, laura	Raftery, Rita	ragalyi, sarah
Ragan, Jennifer	Raganato, Alessandro	Raghavan, Gopal	Ragland, Donna	Rago, Eileen	Rahbari, Carol
Rahe, Carol	Raheem, Yamani	Rahilly, Jack	Rahim, Jwahir	rahm, Alicia	Raible, Annette
Raich, Marie	Raihle, Laura	Raikes, Karen	Raimbault, Delphine	Raimi, Rachel	Raimondi, Paulina

Raines, Karen	Raines, Mike	Raines, Phoenix	rainey, deloris	Rainey, Jennifer	Rainey, John & Barbara
Rainoldi, Liz	Rains, Gail	Rains, Rebecca	Rains, Tracy	Raio, Hailey	Raisch, Dan
Raiselle, Naomi	Raitt, Jacob R.	Rajan, Narayan	Rajkhowa, Dora	Rakowski, Debbie	Rakowski, William
rallides, debra	Ralls, Cynthia	ralph, cecil	ralston, elizabeth	Ralston, Joseph	Ramakers, Michelle
ramamurthy, sue	Rambaran, Nadia	Rambow, Rosemary	ramirez duarte, Stefanie	Ramirez Ortega, Lucio	Ramirez, Alma
Ramirez, Camila	Ramirez, Daisy	Ramirez, David	Ramirez, Emilie	Ramirez, Emmanuel	Ramirez, Jessica
Ramirez, Judith	Ramirez, Liza	Ramirez, Maria	Ramirez, Mickey	ramirez, monica	Ramirez, Myrangelie
Ramirez, Nikki	Ramirez, Reina	Ramirez, Sally	Ramirez, Seamus	Ramirez, Thom	Ramirez. JR., Alex
Ramon, Laura	Ramoni, Elizabeth	Ramos, Georgina	Ramos, Joann	Ramos, Lorie	Ramos, Marc
Ramos, Maria Isabel	Ramos, Maricela	Ramos, Miguel	Ramos, Paul	Ramos, Pilar	Ramos, Rosaly
Ramos, Stacey	Ramos, Ursula	Ramos-Lopez, Ovidio	Rampi, Philip	ramsay, alex	Ramsby, Lois
Ramsey, Betty	Ramsey, Elizabeth	ramsey, james	Ramsey, Philip	Ramsey, Sandy	Ramsey, Walter
Ramstrom, Eric G.	Ramstrom, Shirley	Rana, Saira	Rancatti, Jan	Rand, Charles	Rand, Lindsey
Rand, Lucy	Randall Jr, Kyle	Randall, Ann	Randall, Dorene	Randall, Kay	Randall, Leland D.
Randall, Mary	Randall, Stephanie	Randall, Stevi	Randell, Monica	Randell, Monica	Randers-Pehrson, Hale
Randle, Natalie	Randles, Kathleen	Rando, Nell	Randolfi, Anita	Randolph, Anne	Randolph, Don
Randolph, Gerry	Randolph, Kimberly	Randolph, Peter	Randolph, Stephanie	Randolph, Sylvia	Raney, Gary
Raney, Michael	Range, Lauren	ranieri, Rich	rankin, ronnie	Ranly, Don	Ransdell, Ann
Ransford, Patti	Ransom, Jennifer	Ransom, Sara	Ransome, Linda	Ranson, Donna	Ranz, Gary E.
Raphael, Magi	Rapillo, Susan	Rapone, Chase	Rapp, Kathy	Rapp, Lauren	Rapp, Neville
Rappaport, Alex	Rappaport, Lois	Rappaport, Steve	Rapplean, Tiffany	Rappoport, Boris	Rarick, Christina
Rasbury, Patricia	Raschick, Carol	Rash, Mary	Raskey, Robert	Raskin, Arlene	Rasmussen, Bruce
Rasmussen, Letha	rasmussen, margaret	Rasmussen, Pat	Rasmussen, Paul	Rasmussen, Ross	Rasmussen, Shannon
Rassler, James	Rasul, Eysha	Ratajczak, Kaila	Ratajczak, Karen	Ratan, Sia	Ratcliff, Charline
Ratcliff, Philip	Rathbone, Marjorie	Rathbun, Ariel	Rather Medina, Judy	RATHMAN, LUANA	Rathmanner, Susan
Ratliff, Joe	Ratliff, Nancy	Ratner, Ronald	Ratoff, Lynn	Ratta, Alexander	Rattenbury, Nancy
Ratterree, Charles	Rattigan, Chris	Ratzlaff, Karen	raubenolt, betty	Rauberts, Pearl	Rauch, Stefan
Raughley, Brad	raulerson, gina	RAupp, Julie	Rausch, Elizabeth	Rausch, Jennifer	Rauscher, Janet
Rautus, Toni	Rauworth, Steve	Ravelo, Nancy	Raven, Alice	Raven, Kerrye	raven, robert
Ravenscraft, Conall	Ravishankar, Krish	Ravitts, Ricki	Rawding, Faith	Rawl, Francie	Rawlings, Joanne
Rawlings, Linda	Rawson, Lindsay	Ray y Velarde, Stefanie	Ray, B.	Ray, Barbara	Ray, Belinda
Ray, Carol	Ray, John	Ray, Judy	ray, kristy	Ray, Laura	Ray, Linda
Ray, Rita	Ray, Sandra	Ray, Susan	Ray, Suzanne	Ray, Tim	Rayburn U.S. Veteran 1963-1967, Bob
Rayburn, Russell	Rayburn-Livingston, Heather	Raye, Rebecah	Rayhill, Ashley	Rayl, Douglas	Raymer, John
Raymond, Amanda	Raymond, Danielle	Raymond, Maureen	Raymond, Wendy	Rayne, Dalana	raynier, laara
Raypole, Marguerite	Raza, Fariha	Rea, Linda	Rea, Linda	REA, Rhonnda	Read, Charlotte
Read, Jon	Read, Julia	Read, Katrina	Read, Lisa	Reade, Deborah	Reade, Willam
Reading, Roger	Read-Weiss, Margaret	Ready, Mike	Reagan, John	Ream, Cathy	Ream, Tarn
Reame, Jennifer	Reamer, Susan	Reams, Jessica	Reardon, Brian	reardon, Joy	Rearigh, Elsie
Reason, Sally	reaves, Octavia	Reay, Ruby	Reback, Mark	Rebecca, Kari	Rebello, Stephen
REC, Collectif	Recitas, Lyn-Genet	Reckner, Pamela	Reckord, Emily	Rector, Francesca	RECTOR, JAMIE
Rector, Joy	Rector, Julie	Redacted, Harley	Redd Lohse, Kathryn	Reddy, Chittaranjan	Reddy, Raahul
Redford, Rebecca	Redish, Maryellen	REDLICH, TANIA	Redman, James	REDMAN, JOHN	Redmond, Mary
Redner, Diane	Rednour, Makenzie	Redonda, Erich	Redondo, Carlos	Reeber, Lisa	Reed, Alan
Reed, Andrea	Reed, Anna	Reed, Dawn	Reed, Diane	Reed, Dirk	Reed, Elizabeth
Reed, Jeffrey	Reed, Jo	Reed, Jonathan	Reed, Karen	Reed, Leonard Lenny	Reed, Liz
Reed, Lola	Reed, Mariah	reed, martha	Reed, Mary	Reed, Nancy	Reed, Nancy
Reed, Ottis	Reed, Pamela	Reed, Pat	Reed, Patricia	Reed, Rachel	Reed, Rhiannon
Reed, Rhiannon	Reed, Robert	Reed, Robert M/Carol G	Reed, Stephanie	Reed, Stephen	Reed, Sue
Reed, Suzy	Reed, Walter	Reeder, Christine	Reeder, James	Reedy, Stacy	reek, josette

Rees, Benny	Rees, Michael	Rees, Richard	Reese, Gary	Reese, Judith	Reese, Roger
Reese, Sandy	Reese, Ted	Reesman, Loretta	Reeve, Phoebe	Reeves, Anne	Reeves, Bailey
Reeves, Barbara	Reeves, Deborah	Reeves, Ella	Reeves, James	Reeves, Jennifer	Reeves, Kathleen
Reeves, Ken	Reeves, Lenore	Reeves, Lenore	Reeves, Linda	Reeves, Lisa	Reeves, Valerie
Reeves, Victoria	Refai, Warood	Regan, Barbara	Regan, Bonnie	regan, harlee	Regan, Mary
Regan, Melissa	Regan, Nora	Regele, Deb	Regetz, Jeannette	Rego, Jeffrey	Rego, Margaret G.
Rego, Sonia	Rehberg, Bill	Rehder, Melissa	Rehfeld, Marianne	Rehn, Debra	Reibstein, Karen
reiburn, sandy	Reich, Bonnie	Reich, Carol	Reich, Karen	Reich, Lisa	Reichen, Natalie
Reichert, David	Reichle, Nancy	Reichwein, Bobbi	reid, b	REID, DEBRA	Reid, Donna
Reid, Isaura	Reid, Jena	Reid, Jennifer	Reid, Lucia	Reid, Matthew	Reid, Nancy
Reid, Nina	Reid, Susan	Reider, Shirley	REIDLER, MARY	Reidy, Katherine	Reifman, Jamie
Reifschneider, Jill	Reiger, Christopher	Reiher, Linda	Reiley, Kathleen	Reilly, Linda	Reilly, Linda
Reilly, Marnee	reilly, steven	Reilly, Susan	Reilly-McDowell, Maximilian	reils, sa	Reimer, Katelyn
Rein, Julia	Reina-Rosenbaum, Rose	Reineke, Toni	Reinesch, Bryce	reinhard, nadja	Reinhart, Julee
Reinhart, Pamela	Reinhart, Philip	Reinhart, Robin	Reinharth, Bernice	Reinke, Michael	Reis, Eloisa
Reis, Jennifer	Reischman, Ruth	Reising, Darlyne	Reiss, Edward	reiss, robert	Reiter, Andrea
Reiter-Corts, Elisabeth	Reitz, Michael	Rejsek, Gary	Rekasi, Robert	Remelman, Nicholas	Remer, Mary
Remick-Simkins, Stacey	Remington, Daniel	Remington, John	Remkus, Ann	Remold, Heinz	Remund, Barbara
Ren, Becky	Renaud, Candace	Rendall, Beth	Rendigs, Kim	Rendon, Stephanie	reneau, avis
Renfrow, Mike	Rengers, Edward	Rengers, Lorraine	Rengstorf, Susan	Renison, Nancy	Renk, Edeltraut
Renken, Colleen	Rennacker, Ann	renner, cate	Renner, Janine	Renner, Kay	Renner, Linda
Reno, Karen	Rensch, Pam	Renteria, Toni	Rentmeesters, Stephen	Renton, Barbara	Rentschler, Steven
Repp, Jan	Reppa, Douglas	Reppen, Jasmine	Reppert, Carol	Reprince, Beth	Resavi, Gin
Reschke, Daniel	resende, Mauricio	Resh, Brian	Resheske, Barbara	Rettig, Steven	Reuer, Quentin
Reuter, John	Reutershan, Gail	Reveles, Lauro	revera, laura	REVESZ, MR.&MRS. BRUCE	Revilla, Oscar
Revis, Cathy	Revord, Miichael	Rexin, Timothy	Rexroad, Ralph	Rey, Claudia	Rey, Laura
rey, mary	Rey, Mary	reyes, andrea	Reyes, Genesis	Reyes, Ileana	reyes, jen
Reyes, Jesse	Reyes, Maria	Reyes, Sandy	reyes, teresa	Reyna, Melissa	Reyneveld, Martha
Reynolds, Ann	Reynolds, Danielle	Reynolds, Dianne	Reynolds, Elizabeth	Reynolds, Gibson	Reynolds, Jamie
Reynolds, Jasmyne	Reynolds, Jeff	Reynolds, Joan	Reynolds, Johnathan	Reynolds, Judy	reynolds, K
Reynolds, Kaileen	Reynolds, Karen	Reynolds, Laurie	Reynolds, LisaMay	Reynolds, Lynn	Reynolds, melissa
Reynolds, Michele	Reynolds, Patti	reynolds, rhonda	Reynolds, Ronda	Rezek, Natalie	Rezk, Brenda
Rezvani, Nader	Rhea, Alison	Rhee, Judy	Rhein, Herman	rhindress, nancy	Rhine, Wallace
Rhineer, Vicky	rhoades, debra	Rhoades, Don	Rhoades, Joan	Rhoades, Joseph	Rhoads, Ann
Rhoads, Eileen	Rhoads, Jennifer	Rhoads, Kirk	Rhodes, Annie	Rhodes, April	Rhodes, Elaine
Rhodes, greg	RHODES, H	Rhodes, Ida	Rhodes, Joseph	Rhodes, Karen	rhodes, patti
Rhodes, Stephen	Rhyne, Jennifer	rhys, saeran	riahi, tammy	Riall, Roslyn	Rials, Jennifer
Ribas, Olga	ribeiro, andrea	ribes, christian	Riblett, Mary	Ricard, Yvonne	Ricci, Lynn
Ricci, Mark	ricci, vittorio	Ricciardi, Anthony	Ricciardi, Chase	Riccitelli, Karen	Riccitelli, Theresa
rice, aimee	Rice, Alicia	Rice, Carol	Rice, Chantal	Rice, Doug	Rice, John
Rice, Kim	Rice, Michael	Rice, Michelle	Rice, Nancy	Rice, Raylene	Rice, Robert
Rice, Sheridan Sonne	Rice, Valerie	rice-coughlan, virginia	Rich, Autumn	Rich, Erin	Rich, Grant
rich, herman	Rich, Jennifer	Rich, Patti	Richard, Amy	Richard, Cynthia	Richard, Kiana
richard, liz	Richards, annita	richards, colleen	Richards, Connie	Richards, Galina	Richards, Jacob
Richards, Jennie	Richards, Linda	Richards, Renee	Richardson, Athena	Richardson, Christy	Richardson, Dale
Richardson, Gail	Richardson, Harold	Richardson, Josef	Richardson, June	Richardson, Kathrine	Richardson, Kathryn
Richardson, Kim	Richardson, Larry	Richardson, Lisa	Richardson, Lynn	Richardson, Michael	Richardson, Michael
Richardson, Pamela	Richardson, Philip	Richardson, Rhonda	Richardson, Robert	Richardson, Roberta	Richardson, Roxie
Richardson, Scott	richardson, Stephanie	richardson, tommie	Richert, Barbara	Richetti, John	Richey, Donald
Richey, Paul	Richey, Robert	Richey, Sabrina	Richie, Lauren	Richie, Vanessa	richins, Eric
Richins, Shelby	Richman, Dan	Richman, David	Richman, Ron and Dorene	Richmond, Amberdawn	richmond, lonna
Richmond, Mark	Richter, Elisabeth	Richter, Karen	Richter, Richard	Richter, Rosalie	Rickard, Marie

Rickey, Renee	Ricks, Linda	rico, luzandra	Riddell, Corielle	Riddle, Amy	Riddle, Carolyn
Riddle, Kaily	Riddle, Suzette	Riddlebaugh, Roberta	Riden, Ragen	Ridenour, Carolyn	Ridenour, Charles
Ridenour, linda	ridenour, michelle	Ridenour, Patty	Rideout, Carol	Rider, Dara	Rider, Dianne
Rider, Lisa	rider, Ralph	ridge, eileen	Ridgeway, William	Ridgewell, Suzanne	Ridgley, Patricia
Ridgway, Christine	Ridgway, Kathi	Riding, Jody	Ridley, Donna	Rieck, Denise	Riedel, Lyndall
Riedel, Sara	Riedmam, Laura	riefle, candi	Riehart, Dale	Rieman, Laurie	Riemann, Karl
Riemersma, Karen	Ries, Kelle	Ries, Mary Ellen	Ries, Shelley	riesenfeld, constanze	Rieser, Pam
Riess, Hanne	Rifkin, Adam	Rigano, Kimberly	Rigby, Cheryl	Riggi, Samantha	riggio, julie
Riggle, Tim	riggleman, nancy	Riggs, Annette	Riggs, Bob and Carmen	Rigney, J	Rigney, Jon
rigo, jerri	Rigsby, Cathi	Rigsby, Melissa	Riker, Mary	Riley, Anita	Riley, Barbara
Riley, Callie	Riley, Eleanor	Riley, Elizabeth	Riley, J	Riley, JoAnn	Riley, John
Riley, Kathleen	Riley, Kelly	Riley, Laura	Riley, Mary	riley, melissa	Riley, Nancy
Riley, Nicole	Riley, Tracy	Riley, Tracy	Rillings, Kenneth	Rimmer, Mary Jean	rinaldi, margaret
Rincon, Anna	Rincon, melanie	Rindahl, Laura	Rindler, Joseph	Rindone, Elizabeth	Rinehart, Joan
Rinesmith, Judith	Ring, Kara	Ring, Mary	RINGENBACH, Monique	Ringer, James	Ringgaard, Line
Ringle, David	Ringler, Thomasin	Rings, Sally	Rinker, Robert	Rino, Ennis	Rintoul, Micheal
Rion, Pam	riordan, ruth	rios jr, modesto f	Rios, Elizabeth	Rios, Hector	Rioux-Demore, Louise
RIPALDA, OSCAR	Ripa-Moore, Samantha	Ripp, Russ	Riser, Michael	Rishel, Karri	Rising, Jan
Rising, Janice	Rising, Melanie	Risinger, Susan	Risley, Donna	Rispin, Jason	Riss, Kathryn
Risser, Renee	rister, brenda	Rister, Patricia	Risvold, Cindy	Ritchie, Hope	Ritchie, Mary
Ritchings, Anne	Ritscher, Jim	Rittenhouse, Calvin	rittenhouse, jonathan	Ritter, Alex	Ritter, Alissa
Ritter, Stephanie	Rittle, Kathleen	Ritz, Carmen	Ritzert, Susan	Ritzheimer, Barbara	Rivara, Sophie
Rivas, Cecilia	Rivas, Cenia	Rivas, Lenika	Rivas, Maria	rivas, mary	Rivas, Raquel
Rivas, Rudi	Rivenbark, Jeff	Rivendell, Laura	River, Lin	Rivera, Abel	Rivera, Alex
Rivera, Amy	Rivera, Angela	Rivera, Brenda	Rivera, Chelsea	Rivera, Christine	Rivera, Claudia
Rivera, Danielle	Rivera, Emma	Rivera, Frances	Rivera, Javier	Rivera, Javier	RIVERA, LADY
rivera, mavis	Rivera, Miguel	Rivera, Paco	Rivera, Robert	Rivera, Ruth	Rivera, Sadie
rivera, sarah	Rivera, Sergio	RIVERA-BOYLES, ELISA	Rivero, Bella	Rivero, Maria	Rivero, Renata
Rivers, Janet	Rivers, Jerry	rivers, pamela	Rivers, William	Rives, Douglas	rivette, Gabby
Rizal, Rachel	Rizer, Jim	Rizo, Susana	rizzi, pietro	Rizzi, Rachelle	Rizzo, Barbara
Rizzo, Barbara	Rizzo, Erin	Rizzuti, Greta	Roach, Abby	Roach, Arthur	roach, judith
Roach, Judith	roach, julie	Roach, Paul	Roache, Joel	Robb, Joan	Robb, Patricia
Robbert, Judith	Robbert, Judith	Robbie, Carol	Robbin, Barbara	Robbins, Andrew	Robbins, Beth
Robbins, Cathi	robbins, george	Robbins, Karen	Robbins, Martin	Robbins, Mary	ROBBINS, Mary E.
Robbins, Norma	Robbins, Robert	Robbins, Stephanie	Robbins, Steven	Roberson, Lynne	Roberson, Pat
Roberson, Rachel	Robert, Alain	Robert, Katie	Robert, Rene	Roberto, Robert	Roberts, Alicia
Roberts, Barbara and Frank	Roberts, Bay	Roberts, Blake	Roberts, Brad	Roberts, Cal	Roberts, Chad
roberts, CYNTHIA	Roberts, Daniel	Roberts, Darryl	Roberts, Don	Roberts, Donna	Roberts, Ed
Roberts, Elizabeth	Roberts, Elizabeth	Roberts, Fiona	Roberts, Gail	Roberts, Gail	Roberts, Jacquelyn
Roberts, James	Roberts, James	Roberts, Jamie	Roberts, Jane	Roberts, Jean	roberts, jeannie
Roberts, Jeannie	Roberts, Jill	Roberts, Jonathan	Roberts, Judith	Roberts, Katherine	roberts, katherine
Roberts, Laurie	roberts, les	Roberts, Linda	roberts, marietta	Roberts, Marilyn	Roberts, Michele
Roberts, Mikki	Roberts, Nicholas	Roberts, Peter	roberts, priscilla	Roberts, Rodney	Roberts, Sedona
Roberts, Sharon	roberts, Stacy	roberts, sybil	Roberts, Tom	Roberts, Wanda	ROBERTS, Wendy
Roberts-Moneir, Nancy	Robertson, Diana	Robertson, Dustin	Robertson, Gary	Robertson, George	Robertson, James
Robertson, Katherine	Robertson, Kenneth	Robertson, Larry And Barbara	Robertson, Lisa	Robertson, Myles	Robertson, Sara
Robertson, Susan	Robertson-Lorant, Laurie	Robetto, Oswald	robey, danielle	Robey, Eddy	Robey, Steve
Robichaud, David	Robideau, Janet	Robillard, Keith	Robin, Etta	Robin, Florence	Robinette, odetta
Robinowitz, Marcialyn	Robins, Jennifer	Robins, Maureen	Robinson, Amy	Robinson, Andrew R	Robinson, Cindy
Robinson, Dameta	Robinson, Daniel and Joy	Robinson, Danny	Robinson, David	Robinson, Dennis	Robinson, Donald
Robinson, Dorene	Robinson, Doug	Robinson, Eileen	Robinson, Elizabeth	Robinson, Eric	Robinson, Jacqueline

Robinson, Jacqueline	Robinson, Jane	Robinson, Janet	Robinson, Janet	Robinson, Janet	Robinson, Jeanne
Robinson, Jennifer	Robinson, Jerily	Robinson, Jessica	robinson, karla	Robinson, Kathleen	Robinson, Lee
Robinson, Nancy	Robinson, Nancy	Robinson, Nicola	Robinson, Nicole	Robinson, Pat	Robinson, Phyllis
Robinson, Richard and Carolyn	Robinson, Robert	Robinson, Ron	ROBINSON, SANDY	Robinson, Shirley	Robinson, Thomas
Robinson, Veronica	Robinson, Yosef	Robiolio, Anthony	Robison, Anne	Robison, Marie	Robledo, Iris
Robles, Catherine	Robles, Cindy	Robles, dr. Ignacio	Robles, Esmeralda	robles, samantha	Robley, Nick
Robson, Donna	Robson, Eric	Robson, Rachel	ROCA, NANCY	Rocco, Lily	ROCHA, SANDRA
Rocha, Silvia	Rochat, Carol	Roche, Alexandria	Roche, Chris	Roche, Clinton	Roche, Peter
Roche, Suzanne	Roche, Thomas	Rochon, Linda	Rock rich, Sarah	ROCKEFELLER, JOHN	Rocker, Marilyn
Rockers, Kay	Rocks, Brent	Rockstad, Corinne	Rockwell, Abigail	Rodabaugh, Donna	Rodack, Soretta
Rodarte, MaryKay	Rodden, Molly	Roddis, Marya	Rode, Ed	Rodefer, Marilyn	Rodeman, Mary
Rodenhauser, Paul	Rodenkirchen, Mary C	roder, don	Roderigues, Dennis	Rodgers, Ashlee	Rodgers, Camie
rodgers, gail	Rodgers, Geraldine	Rodgers, Joyce	Rodgers, Kari	Rodgers, Katie	Rodgers, Sally
Rodgers, Vicky	Rodman, Heather	Rodman, Shirley	Rodnesky, Stephen	Rodoff, Lennie	rodoff, lennie
Rodoyianni, Victoria	Rodrigue, Michael	Rodrigues, Gail	rodriguez, alonso	Rodriguez, Angela	Rodriguez, Annie
Rodriguez, Anthony	Rodriguez, Belkys	Rodriguez, Brianna	Rodriguez, Bridgette	rodriguez, cindy	RODRIGUEZ, CLAUDIA
Rodriguez, Debbie	Rodriguez, Dena	RODRIGUEZ, DENNIS	Rodriguez, Erika	Rodriguez, Francisco	Rodriguez, Jose
Rodriguez, Julio	Rodriguez, Karina	Rodriguez, Karina	Rodriguez, Katherine	Rodriguez, Kayla	Rodriguez, Kayla
Rodriguez, Levinson	Rodriguez, Linda J	Rodriguez, Lisa	Rodriguez, LORI	Rodriguez, Mary	Rodriguez, Rodriguez
Rodriguez, Rolando	Rodríguez, Rosa	Rodriguez, Salvador Eduardo	Rodriguez, Susan	Rodriguez, Susan	Rodriguez, Victor
Rodriguez-Cornejo, Jeannette	Roe, Athena	Roe, Christina	Roeber, Nancy	Roedel, Julie	Roedel, Siegrid
ROEDER, MERI	Roeffen, Christine	Roeffen, MF	Roehl, Brittany	Roehrig, Mary	Roelke, Eloise
Roemer, Janet	RoeMiller, Leilani	Roemisch, Debrah	roen, andrea	Roesch, Whitney	Roessel, Nancy
Rog, Janet	Rogalla, Sylvia	Rogers, Allan	Rogers, Audrey	Rogers, Barbara	Rogers, Bev
Rogers, BeverlyAnn	Rogers, Cheryl	Rogers, Christopher	Rogers, Dennis	Rogers, Dirk	Rogers, Donna
Rogers, Donna	Rogers, Florence	Rogers, Irene	Rogers, Jessica	Rogers, Joan	Rogers, Judith
Rogers, Julie	Rogers, Kathleen	rogers, larry	Rogers, Mark	rogers, matthew	Rogers, Michael
Rogers, Nanciann	rogers, pamela	ROGERS, RAY M	Rogers, Ruth	Rogers, Sherry	Rogers, Susan
Rogers-Krick, April	Rogerson, Vicki	Rogewitz, Joseph & Linda	Rogge, Rachel	Rogovin, Frances	Rogowski, Laurie
rohde, Louise	Rohde, Virginia	Rohlfs, Kelly	Rohloff, Rosalyn	Rohloff, Theresa	Rohn, Diane
Rohr, Kathy	Rohr, Terry	Rohrbaugh, Alyssa	Rohrbaugh, Stacey	rohrer, kathleen	Roig, John
Rois, Liana	Rojas, Annette	Rojas, Betty	Rokumoto, Akari	Rol, Anna	Roland, Elyara
Roland, Hank	Roland, Karen	Roland, Raymie	Roland, Sarah	Roland, Tanya	Rolbeck, Kathi
Rolf, Carol	Rolland, Lane	Rollenhagen, Rochelle	Roller-Alling, Alison	Rollings, Barbara	Rollins, John
Rollins, Nell	Rollins, Susan	Rollins, Wayne	Rollison, Sheri	Rollo, Emma	Rollo, M.C.
rollo, pat	Rolofson, Tom	Rolston, PC	Roma, Michele	Romain, Bella	Romain, Sarah
Roman, Matthew	roman, myra	Roman, Nora	ROMANCHUK, MAR	Romaniuk, Greg	Romann, Joanne
romano, christine	Romano, Jan	Romano, Michael	Romanov Hesse Fullerton Grant Dent Morgan Hurst Ho, Empress Margaret	Romanow, Tom	Romans, Jennifer
Romea, David	Romea, Richard	Romeo, Doug	Romer, Elke	Romero, Itzary	Romero, Mirthia
Romero, Shawn	Romero, Stephanie	Romero-Mauro, Maria del Carmen	Romesburg, Denise	Romey, Sondra	Romey, Sondra
Romine, Janet	Romine, Leslie	RONCALLI, LUCIA	Rondinelli, Catherine	Rondyke, Edward	Ronneberg, Terres
Ronningen, Alma	Rooks, alyssa	rooney, Alexa	Rooney, Diane	Rooney, Kelli	Rooney, Marjorie
Rooney, Tara	Rooney-Katsma, Lynne	Roos, Anne	Roos, Irene	Roos, Maryetta	Root, Charlene
Root, Jessie	Root, Michael	Root, Sharon	Roper, Paul	Roper, Renee	Ropke, Melissa
Ropon, Denise	Rorick, Andrew	Ros Celis, Olga	Rosa, Angelease	Rosa, Isabel	Rosa, Lidia
Rosa, Nicole	rosa, sam	Rosado Jr, Samuel	Rosado, Pinky	Rosado, Rey	Rosales, Ana

Rosapapan, Eleanor	rosas, gabriel	Rosas, Greg	Rosas, Lana	Rosberg, Margarita	roscoe, jacqueline
Roscoe, Lee	Rosdahl, Nola	Rose Jr, William	Rose, Calvin	Rose, Carol	Rose, Crystal
Rose, Deirdre	Rose, Elizabeth	rose, elizabeth	Rose, Evalena	Rose, Irene	Rose, James
Rose, Jay	Rose, Jessica	rose, jessica	Rose, Kathryn	Rose, Kimberly	Rose, Marilyn
Rose, Maxine	Rose, Pamela	Rose, Pat	Rose, Sandra	Rose, Sydney	Rose, Tom
Rose, Tracy	Rose, Victoria	Roseberry, Bill	Rosekrans, Erik	Rose-McCahey, Dawn	Rosen, Helene
Rosen, K.	Rosenau, Tamara	Rosenbach, Sue	Rosenberg, Anne	Rosenberg, Ernest	Rosenberg, Irene
Rosenberg, Nancy	Rosenberg, Pauline	Rosenberg, Tamarya	Rosenberger, Maria	Rosenberger, Paul & Verlyn	Rosenberry, Gayle B.
Rosenblad, Kenneth	rosenblatt, j	Rosenbloom, Alvin	Rosenbloom, Deborah	Rosenblum, Roanne	Rosenblum, Ronald
rosenburg, james	Rosenfeld, Jennifer	rosenfeld, laura michele	Rosenfeld, Mimi	Rosenfeld, Wendy	Rosenfield, Clare
Rosenfield, Henry	rosenfield, lynne	Rosenfield, Ralph	Rosenfield, Victoria	Rosengrant, Deb	Rosenhal, Doris
Rosenkotter, Barbara	Rosenkranz, Bob	Rosenson, Donna	rosenthal, Douglas	Rosenthal, Ellen	Rosenthal, Pamela
Rosenthal, Rebecca	Rosenthal, Rima	Rosenthal, Rob	Rosenzweig, Verna	Rosiello, ester	Rosier, Aaron
Rosier, Darla	Rosin, Berte	Rosinski, Ann	ROSINSKI, KATHRYN	Roskoski, JoAnn	ROSKY, Stephanie
Rosoff, Sally	Rosolowska, Joanna	Ross, Adrienne	Ross, Ann Marie	Ross, Ashley	Ross, Audrey
Ross, Bernadette	Ross, Carol	Ross, Charles	Ross, David & Justine	Ross, Douglas	Ross, Elizabeth
ross, jenny	ROSS, Joseph & Roberta	Ross, Kat	Ross, Kelly	ross, laura	Ross, Lesley
Ross, Maxine	Ross, Misty	Ross, Pam	Ross, Pat	Ross, Patricia	Ross, Patsy
Ross, Rebecca	Ross, Samara	Ross, Siena	Ross, Sue	Ross, Susan	Ross, Tammy
Ross, V	Rossachacj, Robert	Ross-Cisneros, Fred	Rosselli, Judith	Rosselot, Sarah	Rosser, Sam
Rossetti, Matthew	Rossi, Daniela	Rossi, Maria	ROSSI, MICHAEL	Rossi, Patricia	Rossie, C
Rossin, Linda	Rossini, Karen	Rossiter, Allison	rossky, ellen	Rossman, Ann	Rosso, Brit
Ross-Quick, Randi	Rosta, Joseph	Rostan, Janice	Rote, Ada	Rotering, Candy	Roth, Chris
Roth, Doris	Roth, Jerome	Roth, Kelly	Roth, Nancy	Roth, Shannon	Roth, Sonia
Roth, Steve	Rothafel, Roxanne	rothauser, judy	Rothauser, S	Rothberg, Cheryl	Rothchild, Eric
Rothe, Sharon	Rothermel, Rose	Rothman, Mitzi	Rothschild, Leah	Rothstein, Michael	Rothstein, Roxane
Rothwarf, Jeanne	Rotondi, Barbara	Rotondi, Christine	Rott, Natasha	Rottloff, Debbie	Rouillier, Ananda
rouleau, linda	roundy, alton	Rountree, Diane	Rountree, Janet	Roupelian, Patil	roure, ignacio
rourke, joyce	Rous, Daniel	Rouse, Emilia	Rouse, Frank	Rouse, Frank	Rouse, Gregory
Rouse, Teresa	Rousell, Emily	Routh, Jeffrey	Routh, Nina	ROUTT, EVELYN	Roux, Bonita
roux, henriette	Roux, Pascal	Rovedo, Nivo	Roverud, Susan	Rowanoak, William	Rowden, Tanya
Rowe, Carrina	Rowe, Kim	Rowe, Penny	Rowe, Sarah	Rowe, Susan	Rowe, Tari
rowell, eadie	Rowell, Edward	Rowell, Patricia	Rowen, Tyler	rowen, vince	Rowland, William
Rowlett, Kimberly	Rowley, Chris	Rowlson, Carolyn	Rowton, James	Roxburgh, Janet	roy, charles
ROY, D.A.	Roy, Gary	Roy, Joe	Roy, Kimberly	Roy, L.	Roy, Nathan
Roy, Ratna	Roy, Sarah	Roy, Will	Royce, M	Royer, Karen	Rozen, Barbara
Rozier, Sharon	Rozner, Jay	Rubalcava, Angelic	Rubel, Carol	Rubel, Scott	Ruben, Anne
Rubens, Juli	rubens, Mari	Rubin, Bill	rubin, david	Rubin, J.	Rubin, Karin
rubin, linda	Rubin, Marc	Rubin, Susan	Rubino, Lia 'Li'	Rubino, Maria	Rubinow, Stuart
Rubio, Dayana	Rubio, Javier	Rubio, Jennifer	rubio, mary	Ruble, Bonnie	Ruble, Lois
Ruby, Elisabeth	Ruby, Jacki	Ruby, Meg	Ruci, Gerd	Rucker, Norman	Rucker, Sue
Ruckman, Heather	Rud, Rita	Rudick, Roxane	Rudin, Linda	Rudinger, Susan	Rudisill, Amanda
Rudner, Patricia	Rudolf, Rubens	Rudolph, JoEllen	Rudolph-Correia, Sheila	Rudy, Sandra	Rudziecka, Barbara
Rudzinski, James	Ruebin, Khalif	Ruedemann, Diane	Ruedi, Gayle	Rueger, Janet	Ruegg, Tanner
Ruehlen, Robyn	Rues, Alicia	Ruffolo, Tracy	Ruggiero, Emma	Ruggiero, Rob	Ruggles, Patricia
Rugland, Gertrude E	Ruhl, Dorothy	Ruhl, Geri	Ruhl, John	Ruhrkraut, Lauren	Ruiz, Adrian
Ruiz, Eligio	Ruiz, Erika	Ruiz, Jackie	Ruiz, Jovanka	Ruiz, Judith	Ruiz, Liza
Ruiz, Mabel	Ruiz, Marcia	Ruiz, Miguel	Ruiz, Nora	Ruiz, Norma	Ruiz, O.
Ruiz, Ralph	Ruiz, Romie	Ruiz, Sandra	Ruiz, Vanessa	Ruiz-Murillo, Tiffany	Rukavina, Betty
Ruland, Kate	Ruland, Sandra	Rule, Bruce	Rule, Juliann	rule, michele	Rull, Anna
Rullmann, Gale	Rump, Trevor	Rumsey, Cary	Rundlett, Ardis	Runge, Alyssa	Runion, Paul
Runkle, Margie	Runkle, Robert	Runn, Dusty	Runnels, Marilee	Runsted, Karen	runyan, debra

Runyon, Dreama	Ruopp, Kathy	Ruperti, Cathy	Rupp, Nancy	Rupp, Nicole	Ruppe, Mark
Rusch, Vincent	Ruscoe, Dean	Rusev, Marina	Rush, Aimee	Rush, Charlene	Rush, Charles
rush, colleen	Rush, Janell	Rushforth, Kristin	Rushing, Amber	Rushing, Melanie	rushlau, mary anne
Rushton, Ann	Rushton, Wendell	Rusinich, Pauline	Ruskie, Dolores	Russ, Dale	russelburg, nancy
Russell, Candace	Russell, Cecilia	Russell, Claire	Russell, Douglas	Russell, Ivan	Russell, Jan
Russell, Karen	Russell, M. K.	russell, margaret ann [peggy]	Russell, Patricia	Russell, Paulinha	Russell, simon
Russell, Toni	russell, vanessa	Russell, Wanda	Russell-Cox, Donna	Russelle, Carole	Russell-Jones, Sandy
Russick, Sharon	russo, cathy	Russo, Cheyenne	russo, cristina	russo, Deborah	Russo, Dorothy
Russo, Elizabeth	Russo, Gabe	Russo, Jay	Russo, Jonathan	Russo, Judith	Russo, Kelly
Russo, Kristina	Russo, Mary Ann	Russo, Meredith	Russo, Robert	Russo, Ronald	ruterman, sandra
ruth, carol	Ruth, Dick	Ruth, Evon	Rutherford, Bruce	Rutigliano, Janet	Rutkowski, James
Rutledge, Pamela	Rutledge, Sarah	Ruud, Anabella	Ryan, Beth	Ryan, Chris	Ryan, Clara
Ryan, Craig	Ryan, Denny	Ryan, Eileen	Ryan, Eileen	Ryan, Elizabeth	Ryan, George
Ryan, Holley	Ryan, Jessica	Ryan, Josephine	Ryan, Judith	Ryan, Katherine	Ryan, Kathleen
Ryan, Kathleen	Ryan, Laurie	Ryan, Marilyn	Ryan, Mary	Ryan, Meghan	Ryan, Natalie
Ryan, r	Ryan, Rachel	Ryan, Richarle	Ryan, Sandra	Ryan, Therese	Ryan, William
Ryba, Beau	Rybicki, John	Rybka, Michelle	Rybski, Susan	Ryburn, June	ryden, Vanessa
Ryder, Jessica	Ryder, Judy	Ryder, Katya d	Ryder, Neal	ryder, sheridan	Ryder, William
Ryding, Neil	Ryerson, William	Rykiel, Edward	Ryland, Gail	Ryle, Kevin	Rynasiewicz, Robert
Rynaski, Helen	Rynbrandt, Donald	Rynes, Michael	Ryon, Niccolina	Rysavy, Robin	Ryznal, Robert
s, amy	S, D	S, D	S, Deb	S, Eldi	s, john
s, joyce	s, julie	s, k	s, kate	S, Lauiula	S, M
s, m	s, praseeda	S, Ravi	S, S	S, Sarah	s, vasiq
S. Reiniger, Cinsearae	S., C.	S., Yanna	Saary, Carina	Saavedra, Damian	Saavedra, Darma
Sabato, Jennie	Sabella, Marilyn	Saberi, Poune	Sabin, Michael	Sabo, Michele	Sacco, Jared
Sachs, Jennifer	sachs, karen	Sacks, Denise	Sacks, Marie	Sacksteder, Carla	Sacksteder, Ronni
Sacre, Virginia	Saddler, Adrienne	Sadeghi, Beatrice	sadler, charles	Sadler, Roger	Sadley, Faith
sadowski, karin	Sadowski, Paul	Saeed, Mustafa	Saenz, Dolores	Saenz, Maggie	Saetta, Joan
Saevitz, Janet	Safran, C. Samuel	sagardua, mariana	sagartz, emma	Sagatelian, Nancy	Sage, Jennifer
Sage, Kristine	Sage, Marcia	Sage, Raylene	Sageng, Brenda	Sagen-Hughes, Laura	Sager, Jeanne
Sager, Jen	Sager, Judith	SAGER, PATRICA	Sagha, Angela	Sagitto, Sandy	Saglietto, Eve
Sagovac, Emily	Sagstetter, Danny	sahebi, nusheen	Sahni, Ramona	Sahnow, Charlotte	Said, Tamera
Sailer, Randy	Sailor, JL	Sain, Robert	Saint, Paul	Sais, Claire	Saito, Don
Saito, Don	Saitta, Martin	Saja, Jean	Sak, Myrna	Sakaguchi, Akiko	Sakara, Marilyn
Sakoda, Kent	Sakura, Peter	Sala, d	Salade, Sylvie	Salafsky, Susan	Salam, Mir
Salama, Moktar	Salanitro, Laura	salas, jan	Salas, Lynn	Salas, Peggy	Salas, Sylvia
Salay, David	salaz, debra	Salazar, Cat	Salazar, Lisa	Salazar, Mary	Salazar, Sara
Salcedo, Lorylain	Salch, Susan	Salciccioli, Kathryn	Saldana, Karla	Saldana, Marisa	Sale, Alexandra
Salerno, Lauren	Salerno, Nancy	salerno, tony	salgado, cristal	Salgado, Juan	Salgado, Mario
Salgado, Natasha	Salgado, Susana	Salguero, Emily	Salib, Sadie	salido, chris	Salinas, Irma
Salinas, Julius	Salinas, Maria	Salisbury, Jamie	Salisbury, Sandra	Salisbury, Tammy	Sall, Gloria
Sallee, Barbara	SALLEE, MIKE	Salma, Ronald	salmans, donna	Salmen, Daniel	Salmon, Rebecca
Salmon, Sadie	Salof, Tanya	Salomon, Shannon	Salone, Margo	Saloway, Debby	Salsich, Anne
Salsitz, Diane	Salstrom, Fredric	Salt, Max	Saltaformaggio, Brendan	Saltalamacchia, Lisa	salter, jenny
salter, Jeremy	Salter, LuAnn	Salter, Sarah	Saltsman, Nancy E	saltz, lizzie	Salustri, Annalisa
SALUZZI, LUMINITA	Salvadore, Karen	Salvas, Kathleen	Salvucci, Venessa	Salyer, Judith	Salzetti, Joe
Sam, Lakhena	Samad, Gina	Samaha, John	samaniego, dorian	Samec, Russell	Samelson, Audrey
Sames, Thea	Samlaska, Julie	Sammis, Susan	Sammon, Salvador	Samp, Cecelia	Sample, Hilary
Sampson, June	Sampson, Kelsey	Sams, Victoria	Samson, Diane	samson, jennifer	samson, patricia
Samuel, Sheryl	Samuels, Barbara	Samuels, Warren	Samuelson, Georgeanne	Samways, Migerly	San Miguel, Pamela
Sanabria, Teryl	Sanayei, Kamran	sanbeg, Michael	Sanborn, Keith	Sanborn, Mary	Sanborn, Suzan
Sanchez Ochoa, Rodolfo	Sanchez, Ada	Sanchez, Bonnie	Sanchez, Corisa	Sanchez, Cristina	Sanchez, Dalila
Sanchez, Debbie	sanchez, Henry	Sanchez, Ignacio	sanchez, jorge	Sanchez, Katherine	Sanchez, Lenora M
Sanchez, Maribel	Sanchez, Naila	Sanchez, Natasha	Sánchez, Ornán	Sanchez, Rachel	Sanchez, Richard

sanchez, roxane	Sanchez, Sandra	sanchez, saul	Sanchez, Sergio	Sanchez, Sr., Daniel J.	Sanchez, Teresa
Sandage, David	Sandall, Karen	Sandberg, Liselotte	Sandeen, Judith	Sandel, Norman	Sandell, Jonathon
Sandelwood, Tanwi	Sander, Joan	sander, susan	SANDER, TERRI	Sanderlin, Alexis	Sanders, Brenda
Sanders, Brett	Sanders, Catharine	Sanders, Chris	Sanders, Jenny	Sanders, Jo	Sanders, John
Sanders, Karen	Sanders, Kenny	Sanders, Maria	Sanders, Michele	Sanders, Miranda	Sanders, Neesha
Sanders, Sarah Jo	Sanders, Shaylen	Sanders, Tammra	Sanders, William	Sanders, Willie	Sanderson, Chloe
Sanderson, Glenn	Sanderson, Jaime	Sanderson, Jennifer	Sanderson, Leslie	Sanderson, Lynn	sanderson, scott
Sanderson, Tina	Sandgrund, Robert	Sandifer, Gail	Sandifer, Pete	Sandler, Marilyn	Sandler, Michael
Sandlin, Pam	Sandman, Jan	Sandmeier, Heidi	Sandok, Florence	Sandoval, Joette	Sandoval, Kelly
Sandoval, L	Sandoval, Veronica	Sandretto, Laurie	Sandritter, Ann	Sands, Carole	Sands, Eileen
Sands, Tracey	Sands-Milsom, Emma	Sandstrom, Rachel	Sandvig, Daniel	Saner, Jackie	Sanford, Claire
Sanford, Ellen	Sanford, Ken	Sanford, Ken	Sanford, Lee	Sanford, Nathaniel De'Vo	Sanford, Sonya
Sangal, Sonya	Sanger, Elizabeth	Sanger, Thomas	Sanguinetti, Karen	Sangy, Rodrigo	Sankovich, Deborahann
SanMiguel, Dagny	Sannella, Frank W.	Sanner, Alyss	Sano, Y. E.	Sanocki, Susan	Sansing, Alexis
Sansone, Kelli	Sansone, V R	Santacroce, Janet	Santacruz, Mary	Santagata, William	SantaMaria, Tiffany
Santana, Babatunde	Santangelo, Frank	Santangelo, JoAnn	Santee, Raymond	Santiago, Jorge	Santiago, Magda
Santiago, Natalie	Santiago, R.	Santiago, Raquel	Santis, Pete	Santistevan, Kelli	Santone, Leah
Santopietro, Michael	Santoriello, Azita	Santoriello, Cathy	Santos, Hamerling	Santos, Marie	Santos, Richard
Santos, Saskia	Santos-oyama, Rita	SANZO, CHRISTINA	sapadin, janet	Sapcut, Jennifer	Sapiens, Alexander
saporito, sam	Sapphire, Valiance	Sappington, Albert	sarabia, mciahael	Saranczak, Jaime	Saravia, Christian
Sardina-Fernandez, Angelica	Sardineer, Ann Marie	Sardo, Steven	Sarego, Deidra	Sarfaty, Peter	Sarfert, Catherine
Sargent, Deborah	sargent, donald	Sargent, Robert	Sargent, Valerie	Sarmad, Naemah	Sarraille, Marijeanne
Sarrica, Charles	Sarris, Dorian	Sarsano, Eileen	saru, mary	Sarvas, Robbyn	Sasaoka, Julie
Sasidharan, Unnikrishnan	saslow, harry & Barbara	Saso, Dora	Sass, Susan	Satata, Josephine	Satchell, John & Judi
Sather, Alice	Satnowski, Brittany	Sato, Nancy	Sattani, Daun	Satterwhite, Jay	Saulenas, Anne
Saulsgiver, Priscilla	Saumier, Dicksie	Saunders, Betty	Saunders, Jan	Saunders, Leigh	Saunders, Linda
Saunders, Mary Helen	saunders, mary j	Saunders, Sharon	Saunders, Susan	Saunt, Jamie	Sauro, Sharon
Sauson, terri	Sauvageot, Patricia	Savage, Alice	Savage, Audreyann	Savage, Carolyn	Savage, Dorothy
Savage, Joseph	Savage, Kitty	Savage, Rebecca	Savage, Reeve	Savage, Rick	Savage, Tami
Savage, William	Savard, Anne-marie	Savasta, Monica	Savett, Adam	savino, sylvia	Sawdon, Rosemarie
Sawicki, Benjamin	Sawicki, Paulina	Sawyer, Angel	SAWYER, ANGELA	Sawyer, Carrie	Sawyer, Janis
Sawyer, Jerry	sawyer, maryjean	Sawyer, Melanie Morris	Sawyer, Sheila	Saxe, Matt	Saxena, Bhavna
Saxon, Diana	Saxton, Jerry and Janice	sayavong, Jessica	Sayeed, Humaira	Sayegh, Kevin	Saylor, Mellissa
Sayre, Elene	Sayre, Peter	Saze, Dave	Scala, Elizabeth	Scalise, Claudia	Scalise, Claudia
Scalise, Heather	Scallan, Cinda	Scallion, Susanna	Scanlin, Don	Scanlon, Kelley	Scanlon, Lucy
Scanlon, M	Scanzillo, Frank	Scarangella, Barb	Scarbeau, Dedra	Scarborough, Alexandra	Scardina, Shaun
Scarlata, Rachel	Scarpati, Rodolfo	Scarpinato, Amy	Scarth, BONNIE	Scavezze, Barb	Scavone, Susan
Scavotto, Rose	SCAVUZZO, christine	sceeles, vicki	Scelba, Ann	Scena, Marian	Schaal, Elizabeth
Schabel, Mark	Schacht, Aniela	Schack, Bonita	Schack, Sara	Schade, Corey	Schade, Debra
SCHADE, KRIS	Schadt, Amy	Schae, Kristin	Schaechter, John	Schaedler, Brad	Schaef, Dennis
Schaef, Robin	Schaefer, Betty	Schaefer, Candace	schaefer, lynn	schaefer, nathan	Schaefer, Rachel
Schaefer, Sarah	Schaefer, Stephen	Schaefer, Zachary	Schaeffer, Claudia	Schaeffer, Kathleen	Schaeffer, Laura
Schaeffer, Mike	Schafer, Peter	Schaffer, Christina	Schaffer, Elizabeth	Schaffer, John	Schaffer-Shaw, Rosanne
Schairer, Janet	Schally, Jennifer	Schamach, Michelle	Schamel, Raymond	Schaming, Carol	Schampel, Julie
Schamsai, Delia	Schaper, Nicholas	Scharaldi, Daniel	scharf, bridgit	scharf, kim	Scharfe, Julie
Scharin, Lisa	Schattenmann, Jeanette	Schatz, Vivian	Schaub, Marsha	Schauer, Andrea	Schauf, Christy
schauger, Kaitlyn	Schaut, Matthew	Schear, Roberta	Schebach, Julia	Schechter, Janice	Schechter, Rachel
Schedler, Ginger	Scheel, Charles	Scheffler, Lawrence	Scheffman, Cassandra	Schehl, Ed	Scheiberle, Richard

Scheich, Kerrice	Scheick, Kandy	Scheiderer, Heather	scheker, denia	scheld, steve	Schelk, Sherri
Schell, Charlotte	schellenger, candice	Schellhorn, Carolin	schemenauer, mary	Schenck, John	Schenck, Judith
Schenk, Paul	Schenone, Lisa	Scher, Carol	Scherer, Josephine	Scherer, Polly	Scherf, Luzie
Scherkenbach, Susan	Schermer, Garrick	Schettino, Roseanne	Scheuer ll, Francis	Scheuer, Mandy	Scheurich, Julie
Schevers, Jenny	schiafone, cherie	Schiavo, Art	schickendantz, Eric	Schicker, Robert	schiedel, angelina
Schiefelbein, Lola	Schieffer, Susanne	Schierburg, Bridget	Schietinger, Helen	Schieven, Barbara	schiff, diane
Schiffer, J	Schiffman, Lauren	Schiffner Fitzgerald, Laurie	Schifter, Barnet	Schihl, ML	Schiks, Diane
Schild, Darvin	Schildwachter, Steve	Schill, Brian	Schiller, Anne	Schiller, Sam	Schilling, Kenneth
schilling, krystal	Schimek, Gayle	Schindele, Paulette	Schindhelm, Bonnie	Schipman, Nikki	Schipper, Dini
Schlachter, Joyce	Schlachter, Scott	Schlaeger, Dorothy	Schlecker, Rose	Schlegel, Amanda	schlegel, dorothy
Schlegel, Helga	Schleich, Kathleen	Schlein, Elizabeth	Schlemel, Pierre	Schlesinger, Sybil	Schlick, Rosemary
Schlosser, Olivia	Schlotterbeck, Nathan	schlude, megan	schmaier, sandra	schmdit, lynn	Schmeder, Nadya
Schmergel, Ava-Marie	schmerler, lori	Schmickle, Tammy	Schmid, Jeffrey	Schmid, Linda	Schmidt, Amanda
Schmidt, Cara	SCHMIDT, Claudia	Schmidt, Courtney	Schmidt, David	Schmidt, Dawne	Schmidt, Jennifer
Schmidt, Jennifer	Schmidt, Joel	Schmidt, John	Schmidt, Kimberly	schmidt, kristine	Schmidt, Linda
Schmidt, Marilyn	Schmidt, Pamela	Schmidt, Paul	Schmidt, Ramona	schmidt, roger	Schmieder, LeRoy
Schmieder, Mark	Schmitt, April	Schmitt, Darlene	Schmitt, Debra	Schmitt, Eric	Schmitt, Jaylen
Schmitt, Karon	Schmitt, Karon	Schmittauer, John	Schmittauer, John	Schmitt-Capwell, Mary	Schmitt-DeBonis, Michelle
Schmitz, Christiane	Schmitz, Patricia	schmock, barbara	Schmoker, Lisa	Schmook, Brijit	Schmotzer, Mary
Schnabel, Erik	schnaidt, ann	Schneble, Shannon	Schneck, Connie	Schnee, Jane	Schneebeli, Chris
Schneebeli, Christiane	Schneeberg, Antoinette	Schneeberger, Susan	Schneggenburger, Vivian	Schneid, Lucy	Schneider, Amy
Schneider, avery	Schneider, Catherine	Schneider, Cathie	Schneider, Edward	Schneider, Gail	Schneider, George
Schneider, Gloria	Schneider, Gretchen	Schneider, Kathy	schneider, LORI	SCHNEIDER, LYNNE	Schneider, N.
Schneider, Regine	Schneider, Wendi	schneiders, barb	Schneier, Martha	Schnell, Jessica	Schneller, Douglas
Schnierle, Michael	Schnitzler, Dave	Schoborg, Tracy	Schoch, Leonard	SCHOCHET, JOY	Schock, John
Schocker, Catherine	Schockner, Janet	Schockner, Mel	Schoeman, Geraldine	Schoemehl, Margie	Schoen, Jessica
Schoenberg, Marc	Schoilew, Nina	Scholer, Aleatha	Scholl, Barbara Sue	Scholl, Chris	Scholl, Jackson
Schollhorn, Maria Teresa	Scholten, Andrew	Scholten, John	Scholz, Denise	Scholz, Ernest	Schonbeck, Gail
schondelmeyer, sandra	Schonwetter, M	Schoolcraft, Ricky	Schooley, David	Schoon, Greta	Schopac, Marie
Schoppe, Bruce	Schossow, Jodie	Schott, Andrea	Schott, Claudia	Schoultz, Lisa	Schrader, Tom
Schraeder, Paul	Schramm, Beatrix	Schramm, Glenn	Schramm, Peggy	Schramm, Rachel	Schrang, Kellie
Schreibe, Anne	Schreiber, Henry	Schreiber, James	Schreiber, Linette	Schreiber, Sharon	schreiber, sherry
schreier, saul	Schrempf, Steve	Schreter, Carol	Schrier, Barbara	Schrock, Rob	Schroeder, Clara
schroeder, glenda	schroeder, glenda	schroeder, james	schroeder, kathy	Schroeder, Matt	Schroeder, Roxanne
Schroeder, Susan	Schroeder, Tom	Schroeder1, Jeff	schroer, david	Schroeter, Nancy	Schroll, Nichole
Schroll, Sylvia	Schropp, JoAnn	Schrott, Ruth	Schsefer, Karen	Schuback, Deb	Schubert, Diane
Schubert, Steve	Schuckman, Daryl	Schue, Shirley	Schueller, Susan	Schuessler, Gail	Schuessler, Michael
Schuett, Gayle	Schuetz, Ralf	Schuhrke, Nancy	Schulenberg, Joshua	Schuler, Bill	Schulman, Jody
Schulman, Jody	Schult, Abby	Schult, Michael	Schulte, Georgiann	Schulte, Joyce	schulte, michael
Schulte, Whitney	schultes, Candida	Schultes, Yolanda	Schults, Tiffiny	Schultsmeier, Effie	Schultz, Cindy
Schultz, Donna E.	SCHULTZ, EDWARD	Schultz, Jamie	Schultz, Jane	Schultz, Joseph	Schultz, Joy
schultz, juanita	Schultz, Julie	schultz, kiatcha	Schultz, Lesley	Schultz, Lesley	Schultz, Leslie
Schultz, Margaret	Schultz, Mary	Schultz, Peggy	Schultz, Peggy	Schultz, Walter	Schultz, Wm
schultze, patti	Schulz, Carol	schulz, rita	Schulze, Gregg	schulze, michael	Schumacher, Amy
Schumacher, Brandy	Schumacher, Carl	Schumacher, John	Schumacher, June	Schumacher, Krista	Schumacher, Mary Ann
SCHUMAN, ANGELA	Schumann, Claudia	Schumann/Kesterdoll, Dolly Dimple	Schureman, Lisa	Schuringa, Nelleke	Schuster, Jeanne
Schuster, Lorene	schuster, mike	Schutt, carol	Schuyler, Steven	Schwalbe, P. Mark	Schwall, Nancy
Schwaller, Greg and Laurie	Schwanke, Barbara	Schwartz, Alexandra	Schwartz, Alysia	Schwartz, Brian	Schwartz, Brianna

Schwartz, Davd	Schwartz, David	Schwartz, Donald	Schwartz, Jack	schwartz, joyce	Schwartz, Joyce
Schwartz, Louise	Schwartz, Michael	SCHWARTZ, SALLY	Schwartz, Tiffany	Schwartzman, Liya	Schwarz, Annie
Schwarz, Edith	Schwarz, Marcia	Schwarz, Pamela	Schwarz, Robin	SCHWARZE, RICHARD	Schwarzenbach, Marian
Schwarzenberg, Faioa	Schwegler, Tom	Schwegmann, Annette	SCHWEIKART, RENEE	Schwendeman, Charlotte	Schwimmer, Georgia
Schwindt, Tanya	Scibetta, Jen	Scileppi, Jade	Scilluffo, Joe	Scimeme, Donna	Sciolaro, Leslie
Scircoli, Amedeo	scoccimarro, georgette jean	Scofield, Derin	Scoggins, Veronica	Scogna, Melanie	Scolavi, Ana
Scoles, Barbara	Scollon, Suzanne	Sconzo, dorothy	score, tara	Scotese, Karen	Scott Sellers, Laura
scott, ann	Scott, Ann Elizabeth	Scott, Barbara	Scott, Barbara	Scott, Barbara	Scott, Barbara
Scott, Belinda	SCOTT, CAROL	Scott, Celia	scott, christine	Scott, Clentonia	scott, deanna
Scott, Desiree	Scott, Dorinda	Scott, Ellen	Scott, Emma	Scott, Gary	Scott, George
Scott, Gina	Scott, J. David	Scott, Jamie	scott, jean	Scott, Jeanine	Scott, Karen
Scott, Karen	Scott, Kate	Scott, Kent	Scott, Laird	Scott, Laurel	Scott, Leslie
Scott, Lorna	Scott, Lorrie	Scott, Melinda	Scott, Monica	Scott, Nolen	Scott, Pamela
SCOTT, PEARL	Scott, Peter	Scott, Peter	Scott, Pippa	Scott, Rachel	Scott, Raeann
Scott, Rick	scott, sheryl	Scott, Tina	Scott, Walter	Scott-Hinkle, Trinity	Scoville, Pam
Scoville, Pam	scozzari, peter	Scribner, Catherine	Scribner, Jason	Scrima, Pamela	scripp, margaret
Scripps, Kathy	Scroggin, Theresa	Scuder, Amanda	Scurlock, Claudia	Scurry, Judy	Seaberg, Kurt
Seaborn, Gregory	Seadler, Ingrid	Seal, Mary	Seal, Ruth	Seales, Sharon	Seals, Donny
Seals, Joseph	Seaman, Carol	Seaman, Elizabeth	Seaman, John	Seaman, Suzanne	Seamans, James
Seamster, Teresa	Seamus, Dan	Searcy, Audra	Searight, Kent	Searles, Teresa	Sears, Carol
sears, jessie	SEATHER, LINDA	Seaton, Gary	Seaton, Kristen	Seaver, Karla	Seavert, Theo
Seay, Catharine	SEAY, GEORGE	Sebastian, Joseph	Sebek, Mary	Seberry, Julie	Sebrosky, Amanda
Sechler, Kathleen	sechrest, diane	Sechser, Carolyn	Seckel, John	Seckendorf, Michael	Seckendorf, Michael
seckler, harold shane	Secor, Katherine	sedano, anndrea	Sedano, James	Sedlacek, Robert	Sedlack, Elaine
Sedlack, Margaret	Sedo, Liset	Sedon, Douglas	Sedy, Alice	See, Genevieve	Seeber, April
seeburger, john	seegler, monika	Seegott, Mary	Seeker, Harley	Seeley, J	seeley, mm
Seely, Kittredge	Seely, Suzanne	Seese, Toni	Seff, Joshua	Sefton, Nancy	Segal, Ellen
Segedy, Avis	Seger, Kimberly	Segginger, Ruth	Segnini, Amy	Segol, Marla	Segovia, Katya
Segura, Carmyn	Segura, Daisy	Segura, Tony	Seibert, Judith	Seidel, Betty	seidelman, Michelle
Seifert, Danielle	Seil, Fredrick	Seiler, Kate	Seiler, Sondra	seim, anne	Seip, Ann
Seip, Ann	Seiter, Charles	Seithel, Leah	seitz, janetlee	Seitz, Lisa	Sekerak, Robin
Sekora, Alex	Selbin, Susan	Selby, Elijah Shannon	selby, jurney	Selch, Ruthie	Seldin, Fran
Seldin, Lori	Seliga, Megan	Seligman, Beth	Sellars, Duncan	Sellars, Shawnna	Sellers, Colby
Sellers, Frank	Sellers, Jennifer	Sellers, Kathy	Sellers, Kenneth	sellers, marcus	Sellers, Rita
Sellin Edland, Kellie	Sellman, Jane	Sellner, Carrie	Sellon, Kim	Sellon, Kim	Seltzer, Devon
Seltzer, Elizabeth	Seltzer, Kathleen	Seltzer, Rob	Selvage, Kimberly	Sem, Jessika	Semanie, Fekade
Semar, Janet	SEMENUK, Cynthia	semit, jacqueline	Sen, Carol	Sen, Lalita	Sendelback, Michael
Senderak, Sr. Mary G.	Senegal, Aaron	seneres, ella	Senko, Bob	Sennello, Patrick	Sennett, Lisi
Sennewald, Ellen	Seno, Gail	Senta, Debbie	Senturia, Brenda	Seo, Grace	Seppala, Brian
Sepulveda, Christine	Sequichie-Kerchee, Debbie	Seras, Andrea	serban, maria	Sercombe, Sarah	Sergi S., Sanchez
Sering, Paul	Sermak, Chester	Serna, Laura	serna, sonya	Sernaker, Aviva	serne, san
seroussi, ruth	Serra, Ruth	Serrano, Celia	Serrano, Denyse	serrano, mari	Serrano, Yvonne
Serratore, danielle	sert, sibel	Servaege, Muriel	Servati, Senna	Servey, Deborah	Serxner, Shoshana
Sesko, Lauren	Sesma, Lorely	sessa, andy	Sessions, Vicki	Setka, Blazenka	Setticase, Mary-Anne
Settle, Helene	Seufert, Sarah	Sevahn Nichols, Adriana	Sevel, Meghan	Seven, Heidi	Severo, Liana
Severson, Donna	Severson, Theresa	Sevilla, Jessica	Sevilla, Mario	Sewekow, Robert	Sewell, Angela
Sewell, Nancy	Sewell, Renee	Sewick, Karen	sexton, J	Sexton, Mark	Sexton, Nicholas
Sexton, sara	Sextro, Ann	Seyfarth, Gordon	Seyfried, Dorothy	Seyfried, Mike	Seymour, Jane
Seymour, Linda	seymour, nancy	Seymour, Rachel	Seymour, Stephanie	Sganbellini, Joseph F	Sgarlata, Wadie
Shaak, Susan	SHACHNOVITZ, BETH VENTIMIGLI	shadbera, dennis	Shade, Priscilla	SHADEL, WILLIAM	Shadix, Katrina

Shadle, Linda	Shadows, Sara	Shadrach, Joyce	Shadrawy, Drew	Shaefer-Havens, Nancy	Shafer, Ralph
Shaffer, Nicole	Shaffer, Pat	Shaffer, Robert	Shaffer-Koros, Carole	Shagrin, Bradford	shah, mansoor
Shahan, Cassie	Shahidzadeh, Koorosh	Shaia, Gerald	Shaia, Gerald	Shaide, Cody	Shaiken, Adam
Shair, Kyra	Shakkour-Perez, Hayfa	Shakman, Melissa B	Shalabi, Jill	Shalat, Harriet	Shallman, Elsy
Shalom, Isaiah	Shambach, Mary	Shamblin, Harriet	Shames, Joan	shames-rogan, julie	Shams, Mohsen
Shanabarger, Paul & Ginny	Shanahan, Sophie	Shank, Kelly	Shankel, Georgia	Shanker, Adrian	Shanks, Wendy
Shanley, Karen	shanno, faith	Shannon, Erin	Shannon, Kathleen	Shannon, Linda	Shannon, Roxana
Shanoian, Jolie	Shaouy, Pam	Shapiro, Denise	shapiro, ellene	shapiro, eric	Shapiro, Howard
Shapiro, Jane	Shapiro, Leo	Shapiro, Michele	Shapiro, Sonnie	Shapiro, Virginia	Shapiro-Nygren, Meyshe
Shappell, Mary	Shard, Nova	Shardo, Judith	Sharee, Donna	Sharkey, Ellen	Sharkey, Mary
Sharkey, Virginia	Sharlock, Leslie	Sharma, Ashish	Sharma, Deven	Sharon, Dnameto	Sharp, Andrew
sharp, cindy	Sharp, Donna	sharp, laura	sharp, zdenka	Sharpe, Cynthia	Sharpe, Libby
Sharpe, Regina	Sharpe, Sumner	Sharpe, Terri	Sharpnack, Jackie	Sharpnck, Sherry	Shats, Tatyana
SHATSKY, TRAVIS	shattuck, judith	Shattuck, Ralph	Shaughnessy, Mary	Shaun, Michael	Shave, Michele
shaver, debra	Shaw, Alex	Shaw, Chloe	Shaw, Connelee	Shaw, Daniel	Shaw, David
Shaw, James	Shaw, Joe	Shaw, Leslie	Shaw, Nancy	Shaw, Phyllis	Shaw, Shirley
Shaw, Stuart R.	Shaw, Tara	shaw, teddy	Shaw, Terri	Shawley, Hunter	Shawver, James
shay, mel	Shayne, Vivian	She, Dolly	Shea, Carolyn	Shea, Catherine	Shea, Cynthia
Shea, John	Shea, Karen	Shea, Kathleen	Shea, Marjorie	shea, michael	Shea, Nancy
Shea, Siobhan	Shea, Tracilynn	Shea-Barber, Kathleen	Sheaff, Robin	Sheaffer, Karen	Sheahan, Maureen
Shearer, Ben	Shearer, Teresa	Sheats, Jeanne	sheaves, kim	Sheck, Sally	Shedd, Dawn
Sheehan, J	Sheehan, Joni	Sheehan, Kathy	Sheehy, sandra	Sheehy, Steve	Sheeler, Pam
Sheeler, Pam	Sheeley, E. C.	Sheen, Bobby	Sheerin, Colleen	Sheerr-Gross, Deirdre	Sheets, Aida
Sheets, Gabriel	Sheets, Sarah	Sheets, Vicky	Sheffer, Bethany	Sheffer, Terry	sheffield, denise
Sheffield, Flint	Sheffield, Shirley	Sheffler, Ronald	Sheggeby, Stan	sheheen, diane	Shehy, Marsha
Sheibley, Kathryn	Sheilan, Sheilan	Shelby, BC	Sheldon, Dean	Sheldon, Haley	Sheldon, Judy
Shelgren, Lois	Shell, Amanda	Shelley, Ian	Shells, Susan	shelton, charles	Shelton, Dorothy
Shelton, elizabeth	Shelton, Felicity	Shelton, James	Shematek, Judith	Shemberg, Bea	Shemberg, Marian
Shemluck, Matt	Shen, Gloria	Shenberger, Ronald	Shenoy, Katherine	Shenoy, Radha	Shepard, Amylee
Shepard, Debra	shepard, elaine	Shepard, Janice	Shepard, Yvonne	Shepherd, Donna	Shepherd, James
Shepherd, John	Shepherd, Marilyn	Shepherd, Sandra	Sheppard, christina	Sheppard, Colleen	Sheppard, Heather
Sheppard, Jackie	Sheppard, Lori	Sheppard, Lucy Dee	Sheppy, Price	Sher, Bret	Sherbo, Sherri
Sherbring, Marta	Sherburne, Andrew	Sherburne, Dan	Sherfey, Janet	Sheridan, Lori	Sheridan, Peter
sheriff, Adrena	Sheriff, Michael	Sherin, Mimi	Sherlock, Ruth Gay	Sherman, Abby	Sherman, Barbara
Sherman, Claudia	Sherman, Dalesha	Sherman, James	Sherman, Loraine	sherman, patricia	Sherman, Rochelle
Sherman, Trisha	Sherman, William	Sherman, William	Sherman-Jones, Cynthia	shermock, maggie	Shero, Dale
Sherrard, Kathryn	Sherratt, Carol Ann	Sherrell, Michele	Sherrill, Angie	Sherrill, Ronda	Sherrow, Morgan
sherry, fran	sherwood, america	Sherwood, Dan	Sherwood, Dean	Sherwood, Elizabeth	Sherwood, Ellen
Sherwood, Trina	Shesgreen, Mary	Shesgreen, Mary	Shevchenko, Iryna	Sheythe, Susan	Shi, Jerry
Shiblaq, S. A.	Shield, Kate	Shields, Cindy	Shields, Donna	Shields, Janice	shields, kenneth
Shields, Maggie	shields, mary	Shields, Nadine	Shiells, Deborah	Shiels, Theresa	Shier, Jo
Shifferd, Sania	Shiffrin, Joyce	Shije, Jeni	Shilling, Bruce	Shiloh, Caren	Shimasaki, David
Shimasaki, E.	Shimata, Kathy	Shimel, Gene	Shimer, Sue	Shimko, Carol	Shin, Anna
Shinault, Alexis	Shine, Stephanie	Shineman, Garth	Shinhearl, Aimee	Shinn, Michelle	Shinn, Michon
Shinsky, Michael	Shipp, Michele	Shipp, Stephanie	Shippam, Christine	Shipsky, Judith	Shipton, Maggie
Shire, Salma	Shirey, Linda	Shirkey, Linda	Shirkey-Barrett, Mary Lou	Shirley, David	Shirley, Jean
shirley, rebecca	Shiro, Timothy	Shishkin, rosemarie	Shiva, Adrian	Shiva, R.	Shivar, Jeffrey
Shively, Judy	Shively, Kim	Shivers, Timothy	Shives, Faith	Shliselberg, Aviva	shliselberg, aviva
Shlygina, Valerie	Shock, Lacey	Shockey, Michelle	Shockley, Chris	Shoemaker, Clinton	Shoemaker, Judith
Shogren, Martha	Shohfi, Sharon	Shokenu, David	Shomer, Clare	Shone, Mya	Shonkwiler, Randy
Shook, Kristina	Shook, Tara	Shopa, Kathleen	Shore, Lisa	Shore, Tammy	Shores, Meredith
Shores, Meredith	Shorkey, Tim	shorrosh, sandra	Short, Barbara	Short, Eleanor	Short, Gregory
Short, Kelsey	Short, Nicole	Short, Penny	Shortall, Matt	Shorter, Alicia	Shorts, Bill
shoup, carol	Shoup, Wendy	Showalter, Robert	Showalter, Timothy	Showell, Sada	Showers, Darren
Shrader, Barbara	shramorama, rylee	shreck, al	Shreve, Colleen	Shreves, Diana	shriver, kate

Shriver, Shawne	Shroads, Leslie	Shrock, Bob	shrum, kathy	shuben, jeffrey	Shue, Jonathan
Shuford, Carla	Shulman, Joseph	Shulof, Vicki	Shultz, Kayla	Shultz, Steve	Shuman, Robert
Shuman, Tecari	SHUMAY, MARY	Shunda, Julia	Shupe, Melissa	Shurley, Lynn	Shurling, Tamara
Shushan, Cheryl	Shushan, Robin	Shuster, Daniel	Shuster, Marguerite	Shute, Brian	Shuter, Melanie
SHUTT, ANGEL	Shyiko, Stanley	siak, Judy	Sibakov, Katja	Sibley, Charlotte	Sibley, Dione
Sibo, Amy	Sibona, Christine	Sibree, Joseph	Siburt, Kristy	Sichak, Michelle	Sicilia, Rose
Sicily, Sandra	Sickels, Andrew	Sickler, Cheryl	Sickles, Nicki	sicovitch, steve	Sida, Alicia Lyn
Siddique, Omar	Sideleau, Raymond	Sider, CJ	Sides, Gayle	Sides, Lee	Sidofsky, Carol
Sidorenko, Aaron	Sidwa, Annette	Siebenaler, Elaine	Siebern, Lisa	Siederer, Martin	siedlarczyk, Zenovia
Siedlecki, Annette	Siefert, Raymond	Siefken, Debra	Siegel, Craig	Siegel, Gemma	siegel, Jean
Siegel, Ms Adrian	Siegel, Paul	Siegel, Regina-Sophia	Siegel, Richard	Siegel, Scott	siegelman, debbie
Siegfried, Rachel	Siegner, Roger	Siegrist, Toni	Siegwald, Joan	Siekevitz, Ruth	Sieniski, Lise
Sienko, Shawana	Sierra, Ann	Siew Im, Chee	siewert, shirley	sigafus, wanda	Sigel, Kathleen
Sigel, Liz	Sigethy, Sharon	Sigler, Dean	Sigler, Jorge	Sigler, Logan	Sigman, Tami
Sih, Ken	Sikazwe, Mbita	Sikes, Cathy	Sikes, Cathy	sikes, lewis	Sikina, Heidi
Sikirica, Chloe	Sikora, John	Silan, Sheila	Silberbauer, Wendy	Silence, Kathy	Siler, Josh
Siler, Julie	Siler, Teresa	Silimkhan, Lina	Silkauskas, Nancy	sill, warren	SILLARI, STEVE
Sillasen, Becky	Sillasen, Becky	Silliman, Sylvia	Sillins, Laurel	SIlls, Lincoln	Silva, Anne Marie
silva, anthony	Silva, C.	Silva, Chrissy	Silva, Diana	silva, Frank	silva, karen
Silva, Maria	Silva, Michael	silva, sharlyne	Silva, Stephanie	Silva, Sylvonna	Silva, Terry Firehorse
Silva, Terrylynn	Silvani, Michelle	Silvano, Liliana	Silvas, Carol	Silvasi, Matthew	Silver, Adam
Silver, Amanda	Silver, Cassandra	Silver, Daniel	Silver, Ron	Silver, Victoria	Silvera, Kelly
SILVERMAN III, B.E.	Silverman, Nancy	Silverstein, David	Silverstein, katie	Sim, Jean	Simas, Carole
Simbras, Alicia	Simcoe, Gerald	Simcox, Sarah	Simcox, Shelley	Simek, Rick	Simeri, Constance
Simerly, Coley	Simko, Steve	Simm, Bob	Simmerman, Lisa	simmonds, leland	Simmonds, Vicky
Simmons MD, Timothy	Simmons, Carlton	Simmons, Cathy	Simmons, Chris	Simmons, Ellen	simmons, g.
Simmons, Gena	Simmons, Glynis	Simmons, Johanna	Simmons, Judith	Simmons, Laurie	Simmons, Linda
simmons, mary	Simmons, Michael	Simms, Cynthia	simms, jeffrey	Simms, Lisa	Simoes, Angela
Simon, Alyse	Simon, Cindy	Simon, Cynthia	Simon, Genevieve	Simon, George	Simon, Jane
Simon, Jennifer	Simon, Jill	Simon, Kristin	Simon, Mimi	Simon, Nancy	Simon, Roslyn
Simon, Sonnta	Simonds, Barbara	simone, denise	Simone, Louise	simonian, Christopher	Simonich, Claire
Simonitsch, Nancy	SIMONNOT, SOFIA	simons, anita	Simons, Eileen	Simons, Fran	Simons, Lola
Simons, Robert	Simonsen, Jennifer	Simonsen, Judith	Simonson, Cindy	Simper, Barbara	Simpkins, William
simpson, brian	Simpson, Carole Lynne	Simpson, Chelsea	Simpson, David	Simpson, Elizabeth	Simpson, Lizbeth
Simpson, Lynn	Simpson, Maryann	Simpson, Michal	Simpson, Pamela	Simpson, Rebecca	Simpson, Sandra
simpson, yumi	Simpson-Loizou, Rachel	Sims, Cameo	Sims, Capri	Sims, Cheryl	Sims, Jacquelynn
Sims, Matthew	Simson, Esther-Grace	Sims-West, Nancy	Simunich, Paulett	simunovic, paula	Sinai, Iris
Sinai, Iris	Sinard, Mackenzie	Sinclair, Candace	Sinclair, Judith	Sinclair, Karen	Sindler, Elizabeth
Sindoni, Jenne	Singer, Barbara	Singerman, Jeannette	Singh, Bhanu	Singh, Bhupinder	Singh, Deborah
Singh, Donna	Singh, Gurpreet	Singh, Pritam	Singh, Radha	Singh, Suki	Singleton, Barbara
Singleton, George	singleton, janeane	Singleton, Jon	SINGLETON, SHAWN	Singleton-Halbrook, Lora	Singwi, Veena
Sinitiere, Mary Nelle	Sinitzki, Karina	Sink, Randle	Sinnett, Maryosa	Sintef, John	Sintjago, Tania
Sinton, Olivia	Sipocz, James	Sippel-Lemmer, Linda	Siracusa, Nancy Ann	Sirios, Leonardo	Sirl, William
sirlin, morgan	sirois, debbie	Sirois, Debra	Sirota, Lyn	Sirull, Richard	Sisk, Cynthia
sisk, sidney	Sisneros, Cynthia	Sistare, Joe	Sites, Terri	Sitko, AnnaMarie	Sittig, Tracey
Sittler, Roseanne	Siva, Amara	Sively, Susan	Sivley, Steve	Sixto, Daniel	Siyam, Helen
Sizemore, Melissa	SJÖGREN, ULRICA	Sjolander, Kurt	Skaar, Pamela	Skaar-Floyd, Jeanette	Skaggs, Kim
Skal, Steven	Škalič, Dita	Skalsky, Rebecca	Skasik, Melissa	Skeens, Chris	skellen, kylie
Skelley, Roanna	Skelton, Cecelia	Skelton, John	Skelton, Julie	Skelton, Shannon	Sketo, Steve
Skews, Geoff	Skiba, Dawid	Skidgell, Ryleigh	Skidmore, Karen	Skidmore, Ramona	Skiff, Jeanie
skiffington, Em	Skindziel, Dawn	Skinner, Elliotte	Skinner, Richard	Skipworth, Barbara	Skipworth, Carl
Skisak, Linda	Skjerven, Colleen	Sklar, Gail J	Skolnick, Kate	skomurski, amanda	Skoner, Judith
Skowronski, Edmund	Skryja, David	skrzypkowski, sharron	Skup, Debra	Skurkis, Lauren	Skutek, Stan

Skwara, Alexandra	Sky, Lindsay	Skydell, Carol	Slabaugh, Sandy	Slack, Debbie	Slack, Ed
Slack, Francine	Slack, Molly	SLACK, STEPHEN	Slade, Susan	Slade, Tim	Slater, Julie
Slater, Leslie	Slater, Melinda	Slater, miriam	Slaughter, Donita	Slauson, Kevin	Slaven, Debra
Slaven, Joseph	Slavik, Robert	Slavin, Zach	Slawinski, Katherine	Slay, Stacie	Slayter, Mary
Sledge, Lynn	Sleeper, Stephen	Sleva, Cathy	Slicker, Dawn	Slifer, Cleo	Slifkin-McClure, Elise
Sliger, James	Sliva, Carolyn	sliwinski, marcia	Slm, Kip	sloan, cathy	sloan, felicia
Sloan, Griselda	Sloan, Hallie	Sloan, Linda	Sloan, Mary	Sloan, Peaches	Sloan, Tom
Sloan, Will	Sloane-Hornseth, Sharon	Sloat, Dale	Slobin, Jan and Larry	Slocombe, Iris	SLOCUM, LEE
Slocum, Nancy	Slocum, Susan	Slomer, Robert	Slomka, Sheri	slone, paul	Slote, Karen
Sloth, Anne	Slott, Art	Slowe, Tanikka	Slusser, Jean	Smafield, Peter	Small, Barbara
Small, Carol	small, gretchen	Small, Helen	Small, Laura	Small, Linda	Small, Mike
Small, Rebecca	Smalley, Beverly	Smalley, Carol Ann	Smalley, Michelle	Smallwood, Mieloka	Smallwood, Tracey
Smaluk-Nix, Kathleen	Smart, Raymond	Smead, Sharon	Smego, Dana	Smell, Jennifer	Smereck, Amy
Smerling, Carol	Smida, Erin	Smiith, Denise	Smiley, Linda	Smiley, Peggy	Smiley, Ronald
Smiley, Shari	Smisek, Betty	Smith Polk, Shelva	Smith, Adrian	Smith, Allen	smith, allene
Smith, Allie	Smith, Alta	Smith, Alyssa	Smith, Amber	Smith, Amy	Smith, Amy
Smith, Andrea	Smith, Angela	Smith, Angela	smith, ann	Smith, Anne Marie	Smith, Anthony
Smith, April	Smith, Arlene	Smith, Aubury	Smith, Austin	Smith, Baker	Smith, Beth
Smith, Beverly	Smith, Beverly	Smith, Billy	smith, brad	Smith, Brandon	Smith, Bret
Smith, Bryce	Smith, Cameron	Smith, carl	Smith, Carolyn	Smith, Casie	Smith, Cathern
Smith, Cathy	Smith, Christine	Smith, Christine	Smith, Christine	Smith, Christopher	smith, christopher
Smith, Ciera	Smith, Clive	Smith, Corinne	Smith, Corinne S	Smith, Danielle	Smith, Darla
SMITH, DARRELL	Smith, Dave	smith, david	Smith, David	Smith, David	Smith, David
Smith, Dawn	Smith, Dea	Smith, Deb	Smith, Debbie	SMITH, DEBORAH	Smith, Dee
Smith, Denise	Smith, Diana	Smith, Diane	Smith, Dickson	Smith, Dina	Smith, Donald
Smith, Donald	Smith, Donna	Smith, Donna	Smith, Donna	Smith, Edith	Smith, Edwina
Smith, Eileen	Smith, EJ	Smith, Elizabeth	Smith, Emily	Smith, Florence	Smith, Fran
Smith, Frances	Smith, Gary	Smith, George	Smith, George	Smith, Gerald	Smith, Gina
Smith, Glennis	Smith, Gordon	smith, hal	Smith, Haley	Smith, Holly	smith, horace
Smith, Ingrid	Smith, Irv	Smith, Isabella	Smith, ivette	Smith, J.T.	Smith, Jacqueline
smith, jacqui	SMITH, JANELL	Smith, Janet	Smith, Jaszmene	Smith, Jay	smith, jeff
SMITH, JERRY	Smith, Jim	Smith, Joan	smith, john	Smith, Joie	Smith, Judith
Smith, Julie	Smith, Karrie	Smith, Kathleen	Smith, Kathleen	Smith, Kathryn	Smith, Kaycee
Smith, Keelan	Smith, Kellie	Smith, Kellie	Smith, Kelly	Smith, Kenna	Smith, Kent
Smith, Keyler	Smith, Kristin	Smith, L	Smith, Larry	Smith, Laura	Smith, Laura
Smith, Laurence	Smith, Linda	Smith, Linda	Smith, Linda	Smith, Linda	Smith, Lisa
Smith, Lisa	Smith, Lloyd	Smith, lMD, David L.	Smith, Lois	Smith, Lori	Smith, Lori
smith, lucia	Smith, Lynn	Smith, M Ruth	Smith, Machelle	Smith, Mara	Smith, Marietta
Smith, Marilyn	smith, mark	Smith, Marlene	Smith, Martie	Smith, Mary	smith, mary
Smith, Maryann	Smith, Matalee	Smith, Matthew	smith, meg	Smith, Melissa	Smith, Melissa
Smith, Melva	Smith, Mercedes	Smith, Michael	Smith, Michael John	smith, mikayla	Smith, Nancy
Smith, Nancy	Smith, Nicole	Smith, Norleen	Smith, Oliver	Smith, Paige	Smith, Pam
SMITH, PAMELA J.	Smith, Patricia	Smith, Patricia	Smith, Patrick	Smith, Patrick	Smith, Paula
Smith, Peter	Smith, Phyllis	Smith, Pricilla	Smith, Rachel	Smith, Rashad	Smith, Ray
smith, ray	smith, ray	Smith, Raymond	smith, rebecca	Smith, Richard	Smith, Richard
Smith, Richard	Smith, Rita	Smith, Robert	Smith, Robert	Smith, Robin	Smith, Robin
Smith, Ronald	Smith, Ronda	Smith, Rose	Smith, S J	Smith, Sandra	smith, shameka
Smith, Sherri	Smith, Shirley	Smith, Shirley	Smith, Shirley	Smith, Sonia	smith, stacey
Smith, Stephanie	Smith, Stephanie	Smith, Steve	Smith, Steve	Smith, Steven	Smith, Sue
Smith, Susan	Smith, Susan	Smith, Suzanne	Smith, Sylvia	Smith, Teresa	Smith, Teresa
smith, teresa	Smith, Thomas	Smith, Tim	Smith, Tracey	SMITH, V	Smith, Velda
Smith, Virginia	Smith, Wendy	Smith, Zach	Smith/Hill, Lynn/Edward	Smither, Jennifer	Smith-Hos, Laura
Smith-Meyers, Sherry	smith-morgan, pat	SMITHSON, PAMELA	smithwick, robin	Smoak, Copley	Smock, Amanda

Smolanovich, Marcus	Smolen, Michele	smolen, michele	smolen, michele	Smolenski, Donna	Smoot, Christopher
Smudin, Carole	Smullen, Barbara	Smutny, chrissy	Smyth, Douglas C.	Smythe, Carolyn	Smythe, Martha
Smythe, Richard	Smythe, Tina	Snajdar, Ivan	Snavely, Irene	Snee, Ann	Snee, Thomas
Snell, Barbara	Snellbacher, Lainy	Snesrud, Catherine	Snider, Darleene	Snider, Julie	Snider, Ronda
sniderman, sonia	Snitzer, Eileen	Snodgrass, Courtney	Snope, David	Snow, Darcey	Snow, Krystal
Snow, Leigha	Snow, Mary	Snow, Susan	Snowball, Susan	Snowden, Janet	snowden, Michelle
Snowdon, Hilton	Snyder, Cheryl	Snyder, Cynthia	Snyder, Diane	Snyder, Franz	snyder, george
Snyder, Joanne	Snyder, Marion	Snyder, Robert	Snyder, Robert	Snyder, Ronaele	Snyder, Sheila
Snyder, Tiffany	Snyder, Tiffany	Snyder, Tina	Snyder, TL	Snyder-Baldonado, Elizabeth	So, Yin
Soard, Kyle	Soares, Faye	Soares, Faye	Soares, James	Sobczak, Scott	Sobditch, Kristin
Sobel, Alla	sobel, wendy	Sobin, Anthony	Sobocinski, Christine	Sobol, Mary	Sobral, Bianca
Socorro, Lorraine	soddy, diane	Sodfried, Bianca	Sodomka, Mary Lou	Sodrel, Don	Sodrel, John
Soenksen, Mark	Sofia, Thomas	Sofilic, Naomi	Sofio, David	sofir, Aviram	sofka, sandra
Sogorka, Amber	Sohl, Erica	Soike, Karen	sokol, abbey	Sokolova, Ilga	Sokolowski, Scott
sol, Frederique	Solano, Nicole	Solazzo, Alyssa	Solberg, Nancy	Soldanels, Sarah	Soldati, Joseph
Soldavini, Shirley	sole, Maire	Solem, Richard	Solender, Sue	soler, diana	Solesby, Eli
Soley, Eric	solheim, lisa	Solinko, Frank	Solis, Carlos	Solis, Margarita	Solis, Michael
Solomon, Lodena	Solomon, M	SOLOMON, ROBIN	solomon, yasmin	Soltero, John	Solum, Mary
Solymar, Dorina	Solzman, Nancy	Somer, Lawrence	Somers, Andrew	Somers, Jeff	Somers, Julie
Somkin, Anthony	SOMLAI, ERIKA	Somma, Laura	Sommer, Bettie	Sommer, Kathy	Sommer, Kenna
sommerfeld, barb	Sommerfeld, Beth	Sommert, Amanda	Soncrant, Shari	sondall, judy	Song, Ara
SongWinds, Jean	Sonne, Elaine	Soon, Richelle	Soos, Judith	sootsman, Jessica	Sopcisak, Lowell
Soper, Lori	Soper-O'Rourke, Anna-Marie	Sopher, Kelly	SOPHIE, DURU	Sophy, Nicole	Sopina, Anna
sopoci-belknap, rory	sorbello, dino	Sorem, Carl	Sorensen, Doug	Sorensen, Keeli	sorensen, lenore
Sorensen, Paul	Sorensen, Sally	Sorenson, Danita	Sorenson, Linda	Sorotkas, Richard	Sorrell, Terri
Sorrells, Hope Mckelvey	Sorstein, CAroline	sortino, wendy	Sortland, Joyce	Sorto, Miriam	SORUM, ROBERT
Sosa, Libby	sotelo rios, beto	Sotelo, Tiffany	Soteropoulos, Patricia	Sothern, Robert	Soto, Breanna
soto, christine	Soto, Connie	Soto, Kristin	Soto, Maria	soto, Marilda	soto, myrta
Soto, Robert	Soto, Robert	Soto, Yanira	Sotomayor, Nora	Souder-Coyle, Irene	Souders, Colleen
Soulier, Ruth	Sousa, Eunice	Sousa, Leone	Sousa, Patricia	South, Lisa	South, Sharon
Southard, Michael	Southerland, Laura	Southern Califonria, Ecology Center of	Southern, Steve	Southwick, Christine	Southworth, Daniel
Souza, Allison	Souza, Mike	Sovey, Marjorie	Soviero, James	Sowade, Felix	Sowers, Chris
Sownie, Jan	soy, Marilyn	Soyal, Aysegul	Sozio, Jeanne	Sozvirskaya, Tatiana	Spaan, Rebecca
Spaanstra, Thea	Spacek, Pamela	SPACHIDAKIS, THEODORE	Spadafore, Stacey	Spaeth, Judit	spagnoli-berman, silvia
Spahn, Deborah	Spahn, Sydney	Spahr, Tami	Spain, Janet	Spain, Peter	Spalding, Cathy
Spalding, Tom & Linda	Spale, Valerie	Spallone, Margaret	Spallone-Vogelsong, Kathy	Spanel, Ann	Spangler, Gregory
Spaniel, Jasmine	Spann, Bridget	Spanogle, Vicki	Spanski, Linda	spare, Rosemarie	Sparkman, Fred
Sparks, Bob	Sparks, Carole	Sparks, Jack	sparks, jack	Sparks, Laurie	Sparlin, Shauna
Spatafore, Jennifer	Spaulding, Stephen	Speakman, Jan	Spear, Michael	Spear, Stanley	Spear, Yvonne
Spears, CARROLC	Spears, Cynthia	Spears, Khara	Speck, Caryl	Speckmann, Deborah	spector, Carol
Speelman, Alan	Speer, Chelsea	Speer, Tom	Speer, William	Spees, Lynn B.	Speicher, Sandra
Speidel, Barbara	Speidel, Kurt	Spelbos, Ann	Spelbring, Sally	Spellman, Sue	Spelter, Nina
Spence, Reba	Spence, Zach	spencer, autumn	Spencer, Brent	Spencer, Gayle	Spencer, James
Spencer, Karen	spencer, kathleen	Spencer, Kelly	Spencer, Martha	Spencer, Martha	Spencer, Michael
Spencer, Monica	Spencer, Patricia	Spencer, Patti A	Spencer, Paul	Spencer, Rita	Spencer, Sara
Spencer, Virginia	Spence-Tidd, Danielle	spenger, david	Spengler, Susan	Speoles, Suzanne sproles	Spero, Sharon
Sperry, John	Spevak, Edward	Spicer, Camilla	Spicer, Kelyla	Spickler, Julie	Spiegel, Edwyna
Spiegelberg, Barbara J	Spiegelman, Robin	Spielman, Margery	Spiers, ardell	Spillman, Susan	spilsbury, ariel
Spinden, Joseph	Spindler, Susan	Spinella, Nancy	spinner, mark	Spirit, Gypsy	spiros, jeff
spisak, d.j.	Spitalere, Sheri	Spiteri, Erika	spitzer, abby	Spitzer, Barry	Spivey, Rebecca

Splan, Mary	spleas, vicki	Splichal, Beth	Spoerl, Joan	spoon, leslie	Spoonster, Stacy
Spoont, Kathleen	Spor, Rhonda	Sportsman, Brenda	Sposaro, Nicolina	Sposato, John	Spottiswood, Anne
Spradley, Michelle	Spradlin, Don	Spradlin, Karen	Spradling, Sam	spragg, Karen	Sprague Kolb, Rebekkah
Sprague, Belle	Sprague, Jeanne	Sprague, Kara	Sprague, Sally	Sprague, Tammy	Spratley, Richard
Spreen, Edward	Sprehe, Vivian	Spriggs, Anthony	Spring, Bruce	Spring, Susanne	Springer, Cynthia
Springer, Steven	Sprinkel, Juli	sprinkle, pamela	Sproat, Jan Lee	Sprouse, Sharon	Sprowls, Lori
Spude, Amy	Spurgeon, Joseph	SPURLIN, APRIL	Spurlin, Brenda	Spurling, Sherry	spurr, katen
Squeri, Patrick	Squier, Sheila	Squire, Julie	Squires, Amy	Sramek, Jo-Ann	Srery, Andrea
Srivastava, Suneet	Sroat, Ena	St Andre, Jillian	St Cyr, Iaina	st germaine, pamela	St James, Les
St Louis, Paul	St. Clair, Betty	St. Clair, Michelle	St. Germaine, Gerald	St. John, Christopher	St. John, Lee
St.Clair, Rebecca	st.George, Lorraine	St.Pierre, Angelique	st.pierre, crystal	Staab, Al	Staas, Bonita
Stabenow, Heidi	Stabile, Eileen	Stabler, Jessica	stach, linda	Stachenfeld, Marilyn	Stachnik, Holly
Stachowski, Tesla	Stachura, Delores	Stack, Andrew	Stack, Kathy	Stadelmaier, Judith	Stadler, Debra
Stadler, Inge	Stadler, Sarah Beth	Stadtmueller, Petra	Stafford, Lori	stagg, musia	Staggs, Paul.
Stahelin, Sarah	Stahl, Charlotte	Stahl, Christopher	Stahl, Gail	Stahl, James	Stahl, Lisa
Stahl, Teresa	Stahle, Patrick	Stahler, Daniel	Stahlin, Tempie	stahurski, Joseph	Stalder-Skarmoutsos, Scott
stales, steve	Staley, Gary	Staley, Lisa	Stalker, Eve	Stalker, Joanna	Stall, Spencer
Stallings, Rob	Stallworth, Shelley	Stalnaker, Bob	Stalnaker, Sonja	Stalnaker, Ward	Stalsworth, Wayne
Stalzer, Bonnie	stambler, evelyn	Stamboulian, Victor	Stamm, Gerald	Stamm, Karen	Stamm, Nancy
stamp, barbara	Stamper, Patti	Stamps, Jennifer	Stanat, Sylvia	Standard, Marlee	Standish, Jean
standlee, crystal	Standolariu, Ana-Maria	Standridge, Bertina	Standring Smith, Linda	Stanek, Cheryl	Stanek, Rosemary J.
stanfield jr., wayne	Stanfield, Bill	Stanford Tanguma, Barbara	Stanford, Lee	Stang, Petra	Stango, Dorothy
Stanis, Julia	Stankaitis Gill, Susan Ann	Stankrauff, Alison	Stankus, Bonnie	Stanley, B.R.	Stanley, Beatrice
Stanley, Carla	Stanley, Carol	Stanley, Christina	Stanley, Edh	Stanley, Lala	Stanley, Linda
Stanley, M	Stanley, Richard	Stanley, Richard	Stanley, Richard	Stanley, Sandra	Stanley, Susan
Stano, Robin	Stansberry, Christina	Stansell, Cathy	Stansfield, Jack	Stansfield, Jack	Stansill, Sally
Stanton, Colleen	Stanton, Greg And Amy	stanton, jaymie	Stanton, Leigh	Stanton, Mary Davidson	Stanton-Healey, Marla
Stapler, Carl	Stapleton, Janice	Stapleton, Larry	Stapleton, Margaret	stapley, elizabeth	stapp, laci
Star, Lonnee	Star, Marga	Star, Relf	Starace, Carl	Starck, Lois	Stargrove, Mitchell
staricco, paul	Stark, Arya	Stark, Caitlin	Stark, Gerda	stark, jan	Stark, Lee
Stark, Louise	Starkenberg, Karla	Starkey, Elizabeth	Starks, Melanie	Starling, Clarice	Starner, Michael
Staroba, Edward	Staron, Maryann	Staron, Stanley	Starr, Blake	Starr, Carrie	Starr, Keiht
Starr, Laurel	Starr, Lorrie	starr, stacy	Starratt, Jane	starseed, lozz	Start, I T
Starwich, Mark	Stasczak, Eileen	Stassijns, Ludo	States, Wade	Staudinger, Marko	Staudinger, Nicole
Staudt, Deb	Stauff, Lynn	stauffeneker, emily	Staunton, John	stauske, anette	Stautz-Hamlin, Jan
Stavely, Jary	Staves, Kim	Stavis, Alex	Stavrinou, Andreas	stavropoulos, sandy	Stawinoga, Greg
Stawowczyk, Marcin	Stayton, Lori	Stayton, Natalia	Steadman, Jeremy	Steadmon, Jason	Stearns, Barbara
Stearns, Michael	Stearns, Nathan	Stebbings, Gayle	Stebbins, Betty	Stebbins, Dorsey	Stebbins, Mary
Stebor-meyer, Bobbie	Steck, Burton	STECKEL, SHARI	Stedman, Matt	Steedley, Paula	Steel, Bryan
Steel, Carlene	Steel, Carly	Steele, Ann	Steele, DB	steele, karen	Steele, L
Steele, Marrion	Steele, Mary	Steele, Steven	Steele, Tim	Steelman, Carlyn	Steelman, Katryn
steen, alisa	steen, pamela	steen, shannon	Steenburgh, Sharon	Steenwyk, Dan	Steere, Charity
Steeves, Charleen	stef, studeo	Stefan, Mirella	STEFAN, OLGA and MIRON	Stefanovic, Marina	Steffen, Walter
Steffens, Silna	Steffensen, Wendy	Steffes, Wayne	Stegall, Robin	Stegemann, Emily	Steger, Cindy
Steger, Jim	Stegmeier, Paul	Stehen, Dennis	Steigauf, Brady	Steijn, Alice	Steiker, Gene
Steimer, Alex	Stein, Al	Stein, Barbara	Stein, Cindy	stein, eliz	Stein, Ewa
Stein, Ferrell	stein, Heather	Stein, Jeanne	Stein, Jenny	stein, jonathan	Stein, Julie
Stein, Ken	Stein, Richard	Stein, Sari	Stein, Tom	Steinberg, Jacob	Steinberg, Jane
Steinberg, Rebeca	Steinbrecher, Silvia	steiner, anna	steiner, brandy	Steiner, Neal	Steiner, Sam
Steinhardt, Helene	Steinhart, Carol	Steinhoff, Molly	Steininger, Adrian-Lee	Steininger, Lorenz	Steininger, Lorenz
Steinke, Linda	Steinle, Linda	Steinman, Kara	Steinman, Scott	Steinmann, Sue	Steinmiller, Frank

Steitz, Diane	Steitz, Jim	Steitz, Jim	Stekl, Nichole	Stell, Robert	Stella, Michael
Stellato, Vickie	Steller, Frederica	Stellrecht, Rhonda	Steloff, Andrea	Stelts, Marion	Steltz, Joseph
Stelzenmuller, Bonnie	Stemples, Kareena	Stempniak, Anna	Stendell, Kerry	Stenholmer, Karin	Stenseth, Carolyn
Stenske, Dorothy	Steortz, Patricia	Stephan, Dorothea	Stephan, Dorothea	Stephan, Roberta	Stephan, Stephanie
Stephens, Chandra	Stephens, Deborah	Stephens, Diane	Stephens, Jade	Stephens, Jenny	Stephens, Jon
Stephens, Mark	Stephens, Michelle	Stephens, Michelle	Stephens, Natalie	Stephens, Roger & Mary	Stephens, Sandra
stephens, sara	Stephenson, Ellen	Stephenson, LizaBeth	Stephenson, Martha	Stephenson, Susan	stephenson, teresa
Stephenson, Valorie	stepien, elvy	Steponaitis, John	Stepp, Bobbi	Stepp, Lawrence	Sterin, Pauline
Stering, Claudine	Sterling, Deb	Sterling, Geri	Sterling, Laura	Sterling, Wendy	Stermer Sr, David
Stern, Cynthia	Stern, Divora W	Stern, Laurie	Stern, Linda	Stern, Martine	Stern, Richard
Stern, Robin	Sterna, Kristen	Sternberg, Elaine	Sternberg, Laura	Sternheim, elayne	sterns, pearl
Stertz, Angela	Stetson, Judy	Stetzler, Jean	Steurbaut, Hella	Stevems, Jordan	Steven, Cindy
Stevens, Ann	stevens, autumn	Stevens, C	Stevens, Carol	Stevens, Catherine	Stevens, Christopher
Stevens, Dennis	Stevens, Douglas	Stevens, Earl	Stevens, Eugenia	Stevens, Heather	Stevens, James
Stevens, Jason	Stevens, Joanne	Stevens, Kim	Stevens, Mark	Stevens, Mary	Stevens, Quinten
Stevens, Robert	Stevens, Robyn	Stevens, Russell	stevens, serita	Stevens, Sheila	Stevens, Summer
stevens, tina	Stevens, Trish	Stevens, Wendy	Stevenson, Elizabeth	Stevenson, Jake	Stevenson, Joey
Stevenson, Julia	Stevenson, Mike	Stevenson, Nan	Stevenson, Richard	Stevenson, Sheryl	Stevesand, Pat
Stewart Pabst, Annette	Stewart, Allison	stewart, Barak	Stewart, Barbara	Stewart, Brenda	Stewart, Carolee
Stewart, Cheryl	Stewart, Christine	Stewart, Cleone	Stewart, Dana	Stewart, Dana	Stewart, David
Stewart, Hattie	Stewart, Jacqueline	stewart, james	Stewart, James	stewart, jan k	stewart, jean
Stewart, Jennifer	stewart, jesse	Stewart, John	Stewart, Jonathan	Stewart, Kathy	Stewart, Laura
Stewart, Leslie	Stewart, Leslie	Stewart, Loyette	Stewart, Mark	Stewart, Nancy	Stewart, Pam
Stewart, Ruth	Stewart, Sarah	Stewart, Sheila	Stewart, Sholto	Stewart, Susan	Stewart, Tammi
Stewart, Tracy	Stewart, Tracy	Stewart, Trina	Stewart, Vicki	Stewart-Iles, Gail	Stewmon, Lori
Stiarwalt, Sheridan	Stice, Laura	Sticha, Sticha	Stickel, Ann	Stickley, Beverly	stickney, john
Stickney, Karen	Stiegmann, Mackenzie	Stiehl, Joanna	Stierlen, Lorelei	Stierlen, Lorelei	Stiff, Lee
stiffler, tonya	Stigen, Carmen	STILL, C	Still, Harold	still, Julia	Still, Kevin
Stillman, Clifton	Stillman, Katherine	Stillwell, Lyda	Stillwell, Lyda	Stimac, Vickie	Stimak, Nadine
stimpson, sandra	Stimson, Karen	Stimson, Katrina	stinchcomb, julie	Stine, Rachel	Stine, Rachel
Stingle, Karen	Stinson, Mykel	STINSON, YVONNE	Stipetic, Jennifer	stirling, allan	Stiteler, Ellin
Stitt, Linda	Stitt, Richard	Stitzel, Brenda	Stobbe, David	Stock, Dave	Stock, Leslie
Stock, Sara	Stocker, Janice M	Stockman, Wim	Stocks, Jackie	Stockton, Bret	Stockton, Gigi
Stoddard, Amy	Stoddard, Amy	Stoddard, David	STODDARD, DONNA	Stodola, Beatrice	Stoeckel, Suzanne
Stoecken, Diane	Stoermer, Riley	Stofan, Sandra	Stofko, John	Stofleth, Tracey	stoike, richie
Stokes, Bettina	Stokes, Brian	Stokes, John	Stokes, Lori	Stokes, Sasha	Stokes, Sylvia
Stokes, Zoe	stolarski, janet	stolarz, e	Stolarz, Paul	Stolba, Norm	Stolberg, Martha
Stolfi, Jackie	Stolk, Karl	stoll, paula	Stolte, Michael	Stoltenberg, John and Martha	stoltz, joann
stolzy, kevin	Stone, Adam	Stone, Brenda	Stone, Cheryl	Stone, Chris	stone, cindy
Stone, Ginny	Stone, James	Stone, James	Stone, Jan	Stone, Jane	stone, jessica
Stone, Kathryn Suzanne	Stone, Linda	Stone, Lisa	Stone, Lorraine	Stone, Madeline	Stone, Margee
Stone, Margery	Stone, Mary	Stone, Stephanie	stone, steve	stone, sue	Stone, William
Stoneburner, Lauren	Stoneburner, Susan	Stonecipher, Rob	Stoneham, Walter	Stonehill, Randi	Stonehill, Steve
Stoner, Cynthia J	Stoner, Dorothy	Stonier, Polly	Storch, Gary	storer, evan	Storey, b
Stork, Maryann	Stork, Sharon	Storm, Anna	storm, dawn	Storm, Jennifer	Storm, Laurie
Stormer, Mary	Storms, Anna	Storozynsky, Courtney	Storthz, Carol	Story, Laura	Story, Margaret
Stotenburg, Sandara	Stotz, Nancy	Stouffer, Jessica	Stover, Rebecca	Stover-Volker, Sherry	Stow, Elizabeth
Stowbunenko, Oksana	Stowe, Deborah	Stowe, Jan	Stowe, Julia	Stowell, Jocelyn	Stowell, Karen
Stowell, Lloy	Stoy, Ann	Stoye, Guy	Stoyshich, Zack	StPeter, Sue	Strader, Helen
Stradinger, Melissa	Straight, Courtney	Straight, Olga	Straight, Wayne	Strain, Nicole	Strainic-Dykes, Lisa

Straley, pe	Strand, Kyle	Strand, Linda	Strand, Lois	Strang, Shirley	Strange, ingrid
Strange, Marisa	Stranger, Kat	Strassberg, Rich	Strasser, E.	Strasser, Joy	Strasser, K
Strasser, K	Strassfield, Zoe	Strate, Kris	Stratford, Christina	Stratton, Anthony	Stratton, Charles
Stratton, Jason	stratton, julie	Stratton, Vince	Straub, Carolyn	Straube, Sara	Straugh, Thomas
Strauss, John	Strauss, Jonathan	Strauss, Nancy	Strauss, Patricia	Strauss, Richard	Strauss, Susan
strauss, valerie	Strausser, Lori	Straw, M.	Strayer, Rosa	Strebeck, Robert	Streck, Brittany
Street, Michelle	Streeter, Marjorie	streich, Kim	Streicher, Katherine	Strelec, Susan	Strenck, JoAnne
streppa, art	Stricker, Greg	Strickland, Kathy	strickland, nancy	Strickland, Pat	Strickland, Susan
Strickland, Tracy	Strickler, John	Strickler, Robert	Strickman, Lyn	Stricks, Caroline	Strickwerda, Chris
strieby, catie	Strik, Nicolaas	stringham, Debby	Strippel, Karin	Strobl, Kerstin	Stroble, Trish
Stroh, Andrea	Stroh, Joan	Strohm, Shelley	Strohmeyer, April	Strohscher, John	Strom, Blue
Strombeck, Joyce	Stromgren, Jeff	stronczek, kimberly	strong, andrew	Strong, Elizabeth	strong, fannie
Strong, Gale	Strong, Janet	Strong, Laura	Strongin, Alexis	Strother, Martha	Strotkamp, Dorothy
Stroub, Dale	Stroud, Deborah	STROUP, JEANNIE	Stroup, M	stroup, stephanie	Stroupe, Kerri
Strozier, Donald	Strozier, Robby	strubbe, laurie	Struble, Daniel	struble, Stephanie	Struckman, Elizabeth
Struif, Kathleen	Strumello, Diane	Struse, Amanda	Struthers, Margaret	Strycharz, Dianne	Stryker, KR
Stryz, Jan	Stuart, Fiona	Stuart, Joseph	Stuart, Lisa	Stuart, Marion	Stuart, Marion
Stuart, Michael	Stuart, Michael	stuart, robin	Stuart, Sherry	Stuart, Wendy	Stuart-Jennings, Erin
Stubblefield, Elyn	stubbs, scott	Stubbs, Sherry	Stubits, Babette	Stuckel, Barbara	Stuckey, Lisa
Stucki, Elizabeth	Stuckwisch, Jeremy	Studendorff, Peter	Stuehler, Helen	Stufflebeam, J	Stulb, J.
Stull, Julie	Stull, Lesha	Stump, Brenda	Stunkel, Premila	Sturch, Elaine	Sturdevant, Laure
Sturges, Dale	Sturgis, Leah	Sturgis, Lsura	sturino, angelo	Sturkie, Kathy	Sturm, Lance
Sturtcman, Robert	Sturtevant, Judy	Sturtevant, Loni	Sturtevant, Rachael	Stutterheim, Nathaniel	Styles, Cherryl
Stylos, Athena	Styron, Lori	STYSKal, GWYN	Suarez Lopez, Ximena	Suarez, Claudia	suarez, gaby
Suarez, Mariu	suarez, melissa	Suarez, Roberto	Subbie, Paul	Subic, Marija	Sublett, Esther
Sublette, david	Suchenicz, Carolyn	Suddarth, Garrett	Suess, Gillian	Sugai, Motonari	Sugg, Judith
Sugg, Kathryn	Suh, Helene	Suhayda, Merle	Suit, Karen	suitter, sandra	Sulak, Couryney
Suldon, Erica	Suliman, Josh	Sullenberger, Nathan	sullivaan, sharon	Sullivan SM, Gerard	Sullivan, Amy
Sullivan, Amy	Sullivan, Ann	Sullivan, Arnelle	Sullivan, Brian	Sullivan, Dee	Sullivan, Denise
Sullivan, Diane	Sullivan, Dianne	Sullivan, Dianne	Sullivan, Emily	Sullivan, Erin	Sullivan, Grace
sullivan, gretchen	sullivan, heather	Sullivan, James V.	Sullivan, Joan Paul & PJ	Sullivan, Joseph	Sullivan, Karen
Sullivan, Kate	Sullivan, Kathleen	Sullivan, Linda	Sullivan, Lisa	Sullivan, Maureen	Sullivan, Maureen
Sullivan, Melissa	Sullivan, Michelle	Sullivan, Nancy	Sullivan, Nancy	Sullivan, Pat	Sullivan, Pat
Sullivan, Peter	Sullivan, Quinn	Sullivan, Sandra	Sullivan, Shannon	Sullivan, Steven	sullivan, susan a
sullivan, suzan	Sullivan-Greiner, Amy	Sullo, Mike	Sult, Mariyana	Sultan, Barbara	Sultan, Michael
sumida, kathleen	Sumler, Jim	Summers, Domonique	Summerton, Laurita	Summey, Dow	Summey, Matt
sumner, jeanne	Sumpter, Gloria	Sumrall, Amber	Sun, Kiayu	Sunada, Kristin	Sundarajan, Aditi
Sunday, Skylar	Sundberg, Rebecca	Sunde, Laila	Sundeleaf, Yana	Sunderland, Ann Marie	Sunderland, felicia
Sundholm, Jane	Sundquist, Sandy	Sundqvist, Pirjo	sundqvist, pirjo	Sundstrom, Sarah	Sundvall, Catherine
Sune, ILeana	Sunman, Bob	Sunny, Richard	Sunyata, Kristina	Suozzo, Stephanie	Supersano, Peter
SUPPIN, nathalie	Sur, Penny	sura, jeannette	Surdam, Herschel	Surell, Mindy	Surgeary, Lynn
Surles, Donna	suslovic, joyce	sussmann, Stella	Susta, Emily	Sutherland, John	Sutherland, Laura
Sutherland, Liz	Sutherland, Sandra	Sutherlin, Terry. Wayne	Suthers, Hannah	Sutliff, Leslie	Sutor, Megan
Sutter, Jessica	Suttmore, Zane	Sutton, Bonnie	Sutton, Catherine	Sutton, Craig	Sutton, G
Sutton, Judy	Sutton, Judy	sutton, kasia	Sutton, Sharon	sutton, tom	Suuronen, Miia
Suzelis, Ashley	suzuki, hiroshi	Svatek, Carol	svekric, denise	Svendsen, Carolyn	Svendsen, Dayna
Sverdlove, Ronald	S►villa, Caroline	Svoboda, Claudia	Swafford, Leilani	Swagler, Michael	Swaim, Lauren
swain, check	Swain, Elaine	Swain, Lauren	Swain, Richard	swain, robert&mary	Swan, Cate
Swan, Faye	Swan, Susan	Swander-Reed, Jill	Swaney, Erica	Swank, Carrie	Swank, Jacquelyn
Swankhouse, Gail	Swano, Amy	Swansen, Spencer	Swanson, David	Swanson, Douglass	Swanson, Gregg
Swanson, J	Swanson, John	Swanson, Michael	Swanson, William	Sward, Leesa	Swartling, China
swartz, anna	Swartz, Dean	SWARTZ, EDWARD	Swartz, Janet	Swartz, Janie	Swartz, Lily
swartz, marla	Swartz, Marty	Swatt, John	swayne, peggy	swearingin, debra	Sweat, Forrest
Sweatt, Linda	Swed, Julie	Sweeney, Barry	Sweeney, Catherine	sweeney, jeanine	Sweeney, Juliet
Sweeney, Kathleen	Sweeney, Kelly	Sweeney, Leslie	Sweeney, Pam	Sweeney, Peter	Sweeny, Art
Sweet, Jessica	Sweet, Selina	Sweeten, Ann	Sweetland, Jennifer	sweeton, margi	Sweiback, Lisa

Sweig, Patricia	Sweitzer, David	Sweitzer, Kim	Swem III, Earl Gregg	Swensen, Joy	Swenson, Christina
Swenson, Elizabeth	Swenson-Zakula, Kimberly	Swiatek, Robert	swidler, sharon	Swiencicki, John	Swift, Ingrid
Swift, Killian	Swiger, Michael	Swimley, Thomas	Swinehart, Wretha	Swinford, Pauline	Swinney, Caroline Theus
Swinton, Michael	Swisher, Sandra	Swisher, William	Swistak, Karen	Switalski, Rob	Switky, Christopher
Switzenberg, Jill	Swoffer, Thomas	Swofford, Barbee	Swope, Margaret	Sword, Dana	Sword, J.
Swsnk, Trisha	SWYDEN, BARBARA	Swyer, Alan	Sycalo, Alona	Sydney, Savannah	Syen, Helen
Sykes-David, Kristin	Sylvester, Alexandra	Sylvester, Amber	Symanski, Sally	Symes, Carol	Symmonds, Joanna
Sympson, Susie	Synnestvedt, Wanda	Sypher, Kari	Syroid, Dan	Syron, Kevin	Syrowitz, Jen
Syth, Stephanie	Szabo, Dana	Szabo, Joseph	Szabo, Liz	Szakasits, Robin	Szemere, Anna
szescila, beth	szigeti, Monika	Szumal, R.A.	Szurgot, Jason	Szymanowski, Paul	Szymanski, tom
Szymanskyj, Margie	szymczak, nancy	t, adenisset	T, Alex	t, c	T, C.
t, r	T, Rae	T, T	T., J.	T.M. Petkiewicz, Margaret	T.Roberts, Brenda M T. Roberts
TAAFFE, MICHAEL	Tabachnick, Elena	tabachnick, karen	Tabak, Steven B	Tabb, Amy	Tabbytite, Tirza
taber, gloria	Tabin, Jean	Tabino, Sunny	Tabish, G	Tabony, Charles	Tabor, Catherine
Tabor, Judith	Taborn, Mac	Tache, Jan	Tacker, Barbara	Tackett, Dennis	tackett, jim
tadlock, warren	TAFF, MELVIN	Tafreshi, Farah Alexandra	Tafti, Sherry	Tagawa, Ann	Taggart, Denise
Tagge, Betty	tagli, lauretta	Taha, Lindee	Tai, Hsiao-Tung	TAILLEBOIS, Marie-France	Tait, Alese
Tait, Ann	Tait, Brian	Tait, Doug	Tait, Fonda	Tait, Nancy	Tajdari, Amy
Takach, Ashley	Takacs, Judith	Takada, Marie	Takekawa, Joyce	Taketani, Jennifer	Takush, Kathie
Takush, Kathie E	Talbert, Zandra	talbot, nora	Talbot, Thomas	Talenti, Lisa	tall, khadidia
Tallent, Carolyn	Tallent, Vanessa	talley, misty	Talli, Sheila	Tallmadge, Dara	Tamarin, David
Tamarit, Mariana	Tamimi, Nawal	Tam-Semmens, Helen	Tan, Kristen	Tanaka, Junko	Tanaka, Kazue
tanaka, masayuki	Tang, Anna	Tang, James&Sabrina	Tang, Oi-Pying	Tang, Suda	Tangen, Sione
Tanguay, kelly	Taniguchi, Naomi	Tanimura, Pam	Tank, Robert	Tanke, Sara	Tankersley, Janice
Tann, Rosemary	tanner, karen	Tanner, Ralph	Tanoury, Mary	Tansill, Roy	Tantala, Renee
Tanyag, Dominique	Tanz Kubota, Ria	Tapia, Barbara	Tapley, Scarlette	Tapper, Sharon	Taps, Barbara
Taque, Heather	Tarallo, Mary	Taraniuk, Jutta	Taras, Todd	Tarasik, Diane	Tarbi, Nora
Tardif, Irina	Tareen, Shamyla	Tarkhanova, Marina	Tarkowski, Brenda	Tarnoff, Mary	Taroli, Garry
Tarpley, Matthew	Tarpley, Matthew	Tart, Lisa	Tartaglia, Doorothy	Tarumasely, Linda	Tarver, Margaret
Tasaka, Tomoe	Tasch, Alison	Tascione, Gene	Tash, Sharon and Gary	Tashjian, Bidu	Tashjian, Randy
Tassell, Christina	Tassi, Elma	Tataranowicz, Thomas	Tate, Cindy	Tate, James	Tate, Jo
Tate, Leslie	Tatom, Jeff	Tatom, Ruth	Tatum, Chelisa	Tatum, Jody	tatum, margaret
Tatum, Nancy	Taulman, Gerry	Tauman, Ferne	Taupo, Grace	Tavolino, Jerry	Tawil, Cynthia
Tay, Kevin	Tayloe, Donald	Tayloe, Melina	taylor, april	Taylor, Beverly	Taylor, Christa
Taylor, Christine	Taylor, Claire	Taylor, Dave	taylor, david	Taylor, David	Taylor, Deb
Taylor, Donald	Taylor, Donald Douf	Taylor, Doug	Taylor, Elizabeth A.	Taylor, Elle	Taylor, Ellen
TAYLOR, ERICA	Taylor, Frances K	Taylor, Gigi	Taylor, Heather	Taylor, Imogen	Taylor, J. Holley
Taylor, J. Holley	Taylor, Jacqueline	Taylor, Jean	Taylor, Jennell	Taylor, Jennifer	Taylor, Jennifer
Taylor, Jeremy	Taylor, Jessica	Taylor, Jessie	Taylor, Jill	Taylor, jim	Taylor, Joanna
Taylor, Jodi	Taylor, Jody	Taylor, John H.	Taylor, Judy	Taylor, Kamia	Taylor, Karen
Taylor, Karen	Taylor, Karen	Taylor, Kaye	Taylor, Kelly	Taylor, Kiersten	Taylor, L Cam
Taylor, Lauri	Taylor, Llew	Taylor, Lloyd	Taylor, Margaret	Taylor, Mary	Taylor, Mary
Taylor, Meagan	Taylor, Nancy	Taylor, Nannette	taylor, otisshanee	Taylor, Pamela	Taylor, R
taylor, rachel	Taylor, Rebecca	Taylor, Ricky	Taylor, Robin	Taylor, Robyn	Taylor, Ron
Taylor, Russ	Taylor, Scott	Taylor, Stefan	Taylor, Susan	Taylor, Susann	Taylor, Tana
Taylor, Tanterrian	Taylor, Timothy	Taylor, Tina	Taylor, Victoria	taylor, wendy	taylor, zuriel
Taylor-Faison, Margaret	Taylor-Tsaphah, Janet	Teaford, Ben	Teagardin, Sharon	Teague, Devin	teague, michael
Teague, Richard	Teanio-Plaza, Jeanyee	teboul, chantal	Tech, Pat	Techau, Howard	Techet, Sasha
Tecza, Scott	Tedder, Barbara	Tedesco, Frances	Tedesco-Kerrick, Terry	Tedesco-Kerrick, Terry	Tee, Ange
Teegardin, Susan	Teel, S.	Teet, Jacqueline	Teetzel, Sarah Jane	Teevan, John	Tefertiller, Staci

Teffeteller, Tony	Tefft, Robert	Tegstad, Peter	Tegtmeier, Mary	Tegtmeier, Stacey	Teich, James and Judy
Teicher, Carol	Teitler, Joan	Tejada, Lilian	tejeda, karen	tejeda, yma	tekdogan, ercan
Telcher, Holen	telez, Alba	Telford, Rebecca	Teli, Ann Marie	Tellep, Tracy	tellerday, crystle
tellerday, crystle	Telles, Lawrence	Tellez, Christy	Tellis, Ashad	Telomen, Lisa	Tempelman, Steve
Tempesta, Christi	Tempke, Andrea	Temple, Dan	Temple, Donna	Temple, Melissa	Temple, Michele
Temple, Valerie	Templeman, Krystal	Templeton, Arthur	Templeton, Helen	ten Broeke, Trisha	Tenaglia, Carol
tendo, akima	Tenerelli, Brenda	Tenfjord, Kari	teng, ariana	TenHoopen, Kathryn	Tennant, Lee
Tenney, Megan	Tennnt, Allie	tennyson, willisia	Tenore, Dee	Tenorio, Lisa	tenWolde, Barbara
Tenzer, Fred Arthur	Teper, Shannon	Teplin, Lynne	Tepper, Brian	terdiman, jerrold	Terhune, Anne
terhune, Beverly	terk, robin	Terletzky, Doreen	Termini, Allison	Ternullo, Justin	Terrazas, Ana Luisa
terrell, anna	Terrell, Kristy	Terrell, Larry	Terres, Maria	Terriault, Michelle	TERRIER, EVE
Terrill, Allen	Terriquez, Ulisses	Terry, April	Terry, Carole	Terry, Clifford	Terry, Glendora
terry, jeremy	Terry, Marisabel	Terry, Martin	Terry, Michael	Terry, Robin	Terry, Tiffany
Terzis, Adele Helen	Tesoriero, Stephanie	Tessari, Diane	Tessier, Elizabeth	Tessier, Jonathan	Tessier, Robert
Tessmer, John	Testa, Louis	Tetarenko, Pamela	Tetenbaum, Lawrence	Teters, Thomas J	Tethys, Yara
Teti, Anthony	Teti, Laureen	Tetreault, Pat	Tetro, Barbara	Tetteh, Alex	Tettis, Doris
Teutsch, Meagan	Tevis, Eleanora	Thacker, Joel	Thallon, Ruhi	Thank, Nancy	Tharp, Brett
Tharp, Julie	Tharp, Reynold	Tharpe, Carol	Tharpe, Carol	Thatcher, Cathryn	thatcher, shannon
Thatcher, Sherry	Thatcher, Tobey	Thaxton, Pat	Thayer, J Sophie	thayer, judy	Thayne, Nick.
Theis, Stacie	theisen, carol	theiss, Sandra	Thelander, Donna	Thelen, Leslie	Themas, Debbie
themm, melinda	Theobald, George	Theobald, Tanya	Theodore, Helen	Theodorou, Doris	Theres, Wendy
Theriot, Colleen	Therrien, Jacquie	Thibaudeau, Mary	Thibeault, Raymond	Thibodeaux, Vanessa	Thieke, David
Thieke, David	Thielen, Joanne	Thies, Kare	Thiessen, Derinda	Thill, Kristie	thirlwell, Tiffney
thizon, carole	Thodos, Christina	Tholl, Jonathan	Thollaug, Julia	Thoman, James	Thoman, William
Thomas Buckle, Suzann	Thomas, AM	Thomas, Amber	Thomas, Amy	Thomas, Andrea	Thomas, Ashley
Thomas, Barbara	Thomas, Bette	Thomas, Colette	Thomas, Connie	Thomas, Craig	Thomas, Dayna
Thomas, Debbie	Thomas, Denise	Thomas, Diane	Thomas, Dianna	Thomas, Dorte	Thomas, Eva
Thomas, Franklin	Thomas, Heather	Thomas, Jamie	Thomas, Jan	Thomas, Jason	Thomas, Jean
Thomas, Jeff	Thomas, Jennifer	Thomas, Jessica	Thomas, John	Thomas, Jonkne Faron	thomas, kim
Thomas, Leonard	Thomas, Leonard	Thomas, Lesley	Thomas, Lisa	Thomas, Lyndsay	Thomas, Lynn
thomas, malory	Thomas, Mark	Thomas, Mary	Thomas, Mary	Thomas, Michelle	Thomas, Patricia
Thomas, Randy	Thomas, Regina	thomas, robbie	Thomas, Samantha	thomas, scott	Thomas, Shakayla
Thomas, Sharon	Thomas, Sherry	Thomas, Sonya	Thomas, Stuart	Thomas, Sydney	Thomas, Tammy
Thomas, Tandy	Thomas, Tara	Thomas, Taylor	Thomas, Terry	Thomas, Todd	Thomas, Toni
Thomas, Tracey	Thomas, Trisha	Thomas-Dale, Sandra	Thomas-Hill, Pam	Thomason, Anita	Thomason, mendy
thomas-smith, shannon	thomasson, gary	Thomasson, Ph.D., Gordon C.	Thome, Timothy	Thompson, Abigail	Thompson, Amy
Thompson, Amy	Thompson, April	Thompson, Becky	Thompson, Beverly	Thompson, Bruce	Thompson, Candice
Thompson, Carol	Thompson, Carol	Thompson, Carolina	thompson, casper	Thompson, Catherine	Thompson, cathy
Thompson, Charles	thompson, dan	Thompson, Dee	Thompson, Dena	Thompson, Don	Thompson, Dwayne
Thompson, ELIJAH	Thompson, Eric	Thompson, Esther	thompson, gail	Thompson, Gerald	thompson, greg
thompson, harold	Thompson, Ivan	Thompson, James & April	Thompson, Jeanette	Thompson, Jennie	Thompson, Jeremy W
Thompson, Kathryn	Thompson, Ken	Thompson, Kenneth	Thompson, Kimberly	Thompson, Kris	thompson, laura
Thompson, Lauren	Thompson, Lauren	Thompson, Lawrence	Thompson, Lupe	Thompson, Marilyn	Thompson, Marisol
Thompson, Marty	Thompson, Matthew	Thompson, Maureen	Thompson, Michael	Thompson, Michelle t	Thompson, Nancy
Thompson, Noelle	THOMPSON, PAMELA	Thompson, RaeDonna	thompson, ray	Thompson, Richele	Thompson, Robert
Thompson, Roberta	Thompson, Susan	Thompson, Susan	Thompson, Susan	Thompson, Susan	Thompson, Susan
Thompson, Teri	thompson, tina	Thompson, Todd	thompson, william	Thompson-Chordas, janna	Thomsen, Don
Thomsen, Shelley	Thomson, Darlene	Thomson, Hallie	Thomson, Joy	Thomson, Robert	Thomspon, T J
Thonet, Kathi	Thorman, Kendall	Thorn, Angelique	Thorn, Debbie	Thornburg, Christine	Thornburg, Merrie

Thornburg, Theresa	Thornbury, M	Thorne, carly	Thornell, Nigel	Thorniley, Jay Bea	Thornsbury, Jean
Thornton, Brian	Thornton, Deborah	Thornton, Dominique	Thornton, Gwyn	Thornton, Jeremy	Thornton, Lisa
Thornton, Norman	Thorp, Frank	Thorp, Margaret	Thorpe de Souza, Rivaldo	Thorpe, Sandra	Thorsen, Henrik
Thorson, Ann	Thorson, Marilyn	Thrailkill, James	Threadgill, Michael	Thronburg, Amanda	Throntveit, Mary
Thrower, Michelle	Thuestad, Ruth Ann	Thunen, Erif	Thurairatnam, Susan	Thurman, Bill	Thurman, Dorothy
Thurston, Polly	Thurston, Robert	Thwaites, William	Thyes, Sharon	Thygesen, Rose	Tiago, Daniel
TIBERIO, DEBBIE	Tiburcio, mark alexander	Tice, Susan	Tichenor, Steven	Tichman, Nadya	Tickell, Jeremiah
Ticknor, Florence	Ticotsky, Alan	Tidd, Richard	Tiderman, Jessica	Tidwell, Marion	Tiefer, Hillary
Tiernan, Kevin	Tierney, Cindy	Tierney, Edward	Tierney, Pat	Tierney, Robin	Tierney, Scott
Tiers, Sarah	Tieso, Jovita	tietz, deborah	Tignanelli, Doreen	Til, beatrix	Tilden, Rebecca
Tildes, Katherine	Tilds, Laura	Tilger, Bernadette	Tilghman, Rebecca	Till, Gaby	Tilley, Judy
Tilley, Justine	Tillinghast, Audrey	Tillman, Bruce	Tillman, Henry	Tillman, Janelle	Tillman, Kelly
Tillotson, Virginia	Tilsner, Tatiana	Tilton, Melody	Timber, Jeanne	timbol, ginger	timlin, teresa
Timm, Crystal	Timmerman, Pamela	Timmins, M	Timmins, Molly	Timmons, R.	Timms, Marilyn
Timothee, Anica	timoya, akiba	Timpone, Do.inick	Timson, Jessalyn	Tindal, Charlotte	Tindall, Christine
Tindall, Travis	Tindol, Lolly	Tine', Tina	Tiner, Theresa	Ting, Donna	tinka, rita
Tinkham, Janice	Tinkle, Sue	Tinsley, Brenna	tinsley, susan	Tio, Veronika	Tirado, Christina
Tirado, Genesis	tirado, steve	Tirone, Paris	Tischbern, Ed	Tisdale, wane	Tisdell, Jennifer
Titelman, Ann	Titilah, Jennifer	titov, anna	Titterington, Dave	Titus, Meg	Titus, Susan
T'Kindt, Casey	Toal, Gregory	Tobachnik, Edgar	Tobber, Grete	Tobey, Kathy	Tobias, Christopher
Tobias, Justin	tobin, jennifer	Tobin, Ralph	Tobin, Rosemary	Tobon, Faith	Tocco, Hailee
Toczylowski, Jessica	Todar, Jodi	Todaro, Miriam	Todd, A.	Todd, Allen	Todd, Carmen
Todd, Diertre	Todd, Jane	Todd, Kathleen	Todd, Marlene	todd, miranda	Todd, Richard
Todd, Sandra	Todman, Gloria	Toepfer, Conrad	Togashi, James	Toguchi, Kae	Toilolo, Emelia
toker, michelle	Tokich, Deneen	Toland, Scott	Tolar, Lori	Tolberg, Margaret	Tolbert, Brian
Toledano-Demars, Andrea	Toledo, Justin	Toler, Jean	Toles, Toni	Tolhurst, Rene	Tolle, Joan
Tollefson, Jacquelynn	Tollefson/Conard, Margot	Tolley, Patricia	Tolley, Sylvia	Tollfeldt, Regina	Tollison, Joanne
Tolonen, Axa	Tomaro, James	Tomaschik, Kathryn	Tomasello, Katherine	Tomasic, James	Tomasula, Maria
Tomayko, Darleen	Tomczak, Bartlomiej	Tomek, Jamie	Tomista, Albert	Tomlin, Dianna	Tomlinson, Barbara
Tomlinson, Barbara	Tomlinson, Diana	Tomlinson, Rebecca	Tomlinson, Wayne	Tompkins, Patricia	Toms, Donald
Tomsits, Pati	Tondusson, Thierry	Toner, Patricia	Toner, Sheila	toney, charlotte	Toney, Jeniffer
Toney, Joy	toney-drabik@yahoo.c, jeanne	Tong, Dan	Tonione, Winifred	Tonkin, Gary	Tonkinson, Chris
Tonkyn, m	Tooker, Enid	Toole, Kim	Tooley, Ruth	Toomey, JACINDA	Toomey, Sandra
Toone, James	Toor, Manmeet	Topp, Jamie	Topping, N	Topping, Sheryll	Tor, Lynn
Torab, Habib	Torchenot, Ferold	torelli, mauro	Torgerson, Eric	torget, marie	Torino, Don
toriz, luis	Torley, Irene	tornabene, michele	Tornatore, Marianne	Tornatore, Mitch	Toro San Martin, Julio
Toro, Euripides	toro, jose	toro, m	Torok, Joan	Torre, Grace	Torre, Maria
Torre-Bueno, Ava	torrecillas, patricia	Torrenga, Joy	Torre-Ricker, Monica	Torres, Alicia	torres, america
TORRES, ANGELINA	Torres, Briana	Torres, Christopher	Torres, Cynthia	Torres, David	Torres, Gail
Torres, Gamaliel	Torres, Hilda	Torres, Joe	Torres, Jose	Torres, Joseph	Torres, Keisha
Torres, M.	Torres, Nelly	Torres, Patricia	Torres, Philip	Torres, Raquel	Torres, Sandra
Torres, Susan	torres, thenya	Torres, Yvette	Torrisi, Sharon	toscano, anthony	Toscano, Ava
Toscano, Diane	Toscano, Sharon	Toshalis, Barbara	Toshalis, Barbara	Tost, Jen	Tosto, Ama
toth, fawn	Toth, Jennifer	Toth, Susan	Toth, Tracey	Totham-Davies, Janis	Tothero, Jenna
Toth-Moore, Dane	Totman, Alex	Totten, Suzanne	Totton, Mauri	Toubman, Sara	Tounalom, Vinny
Tounian, Ronald	Tountas, Barbara	Tourtellot, Christine	tourvillle, brian	Toussaint, Beth	touw, margaret
touw, margaret	Tovar, Irene	Towe, Becky	Tower, J A	towers, carole	Towers, Gloria
Towner, Erline	Townill, Linda	Towns, Anna	towns, lajuana	Townsend, Alan	Townsend, Carlos
Townsend, Dr. Darlene	Townsend, Jeanette	Townsend, John	Townsend, Margaret	TOWNSEND, MARY	Townsend, Peter

Townsend, Rebecca	Townsend, Sara	Townsend, Sarah	Townsend, Trisha	Townsend, Trisha	Townshend, Elisa
Townsley, Yvonne	Towry, Paula	Towse, Mary	Toy, Rachael	Toy, Zena	toye, chris
Tracey, Tabitha	Traci, Schwartz	Tracy, Erika	Tracy, Steven	tradewell, valerie	Traeger, Nancy Carol
Trafon, Heather	Trager, Jami	traiman, vivien	trainer, carol	Trainor wilson, patricia	Trainor, Aaron
trakys, geraldine	Tramposh, Debora	Tran, Angela	Tran, Helen	TRAN, KIM	Tran, Lawrence
Tran, Mary	tran, ngoc	Traniello, Francine	Traniello, Francine	Tranter Sr, Brian J	trantham, shelly
trapani, j	Trapani, Karen	Trapani, Tara	Trapp, Stephanie	Tratner, Sheryl	Tratolatis, Denise
trautman, sharon	Travens, Rosie	Travers, James	Travers, Matthew	Travis, Annabelle	Travis, Donna Mae
Travis, Freida	Travis, James	travis, paula	Travis, Tamara	Travis, Terence	Trawick, Elsie
Traylor, Candice	Traylor, Suzie	Traywick, Mary	Treadway, Carolyn	Treadway, Linda	Treadway, Lora
Treatent, Jo Andrea	tree, jonathan	Treece, Leeanna	Treece, Summer	Trees, Barbara	Treesh, Diana
Trefelner, Jennifer	Treffry, Nancy	Trefz, Robin	Tregidgo, Richard	Trejo, Martha	Tremblay, Jake
Tremmel, Leonard	Trenchard, Thomas	Trenchard, Thomas	Trenier, Bea	TRENT, MYRA	Treppe, Monique
Treppeda, Cassandra	Tressel, Marci	Trethaway, Dale	Trevino, Doreen	Trevino, Gerardo	Trevino, Julian
Trevino, Karen	Trevino, Linda	Trevino, Mario	trewin, katherine	Trexler, David	Triana, Antonio
Tribbey, Kerry	Tribble, Peggy	Tribe, Corinne	Trice, Tina	triff, asdur	Triggs, Lori
Trinidad, Brenda	trinkle, heidi	Trinz, Ann	Triolo, Sarah	Trione, Debra	Triplett, Paul
Triplett-Wilkerson, Michelle	tripp, jess	Tripp, Tom	Tripp, V	Tripp, William	trippe, melissa
Trippett, Dora	Tristan, Terry	tritscher, michele	tritt, greg	Tritten, Christine	Trivella, Cyndy
Trizinsky, Denise	Trkulja, Snezana	Troetschel, Ward	TROFATTER, SUSAN	Troiano, Jeremy	Troiano, Larry
Troisi, Gina	TROJAK, HELENA	Troland, Mary	Tromans, Donna Marie	Tromboni, Alessandra	Troncoso, Patricia
Trondsen, Gabriela	Tronolone, Tracey	Tropea, Silvana	trosper, cheryl	Trosper, Michelle	trost, susan
trotter, s.	Trotz, Melanie	Trout, Michelle	Troutman, Marjorie	Troutman, Patricia	Trover, Larry
Trowbridge, Constance	Troy, Loreen	Troy, T	Troyan, Olga	Troyanovich, Steve	trp, kathleen
trucco, alejandro	TRUE, Adele	TRUE, Linda	TRUE, Marina	Trufan, Hal	Trujillo, Bernadette
Trujillo, Corinne	Trujillo, Debbie	Trujillo, Elizabeth	Trujillo, Elizabeth	Trujillo, James	Trujillo, Liz
Trujillo, Steph	Trujillo, Victoria	Trulson, Sandra	Trumbull, Ramon	trump, karlene	Trumpie, Ashley
trupiano, joe	Truppe, Eric	Truscott, Elizabeth	trussell, carol	Trusty, Glen	Trusty, Kristen
Trychta, Julianne	Tryggeseth, Jackie	Tryhubczak, Rachel	tryles, gael	Tsalikis, George	Tsang, Tracey
Tsantilis, Senta	Tsao, Fritz	Tschirhart, Faith	Tse, Fi	tsezana, daniele	Tshibangu, Mandy
tsung, dia	tucciarone, rose	Tuccitto, Christopher	Tuch, Chris	Tuck, jt	Tuck, Vivian
Tucker, Arlen	Tucker, Christina	Tucker, Darren	Tucker, Dena	Tucker, Donald	Tucker, Karen
Tucker, Mandy	Tucker, Mary	Tucker, Meredith	Tucker, Michelle	tucker, robert	Tucker, Shirley
tucker, susan	Tuckman, Roy	Tudor, Daniela	Tudor, Madison	Tufekchiyska, Silviya	Tufenkian, Sona
Tugas, Joe	Tuleck, Becky	Tuley, Midge	Tull, Robert	Tullis, Diane	Tullis, Michael
tulloch, hilary	Tully, Sue	TULYS, WALTER	Tuma, Elizabeth	Tuman, Nancy	Tumarkin, Alexandra
Tumminello, Wendy	Tunell, Richard	Tung, A	Tung, Ann	tunick, janet	Tunstall, Jean
Tupas, Angeline	Turano, John	Turbide, Linda	Turbush, Heather	Turcan, Thibault	Turcotte, Joseph B
Turgeon, Amanda	Turgeon, Valerie Turgeon	turicchi, kelly	Turkewitz, Aaron	Turkovic, Holly	Turley, Diane
Turlo, Joy	turmell, susan	Turnbull, Grace	Turnbull, Karen	Turnbull, Karen	Turnbull, Laura
turner, angela	Turner, Carol	turner, christina	Turner, Daniel	Turner, Dawn	Turner, Donna
Turner, Doris	Turner, Geo	Turner, Jacqueline	Turner, Jason	Turner, Judy	Turner, Kathleen
Turner, Kevin	Turner, Kirsty	Turner, Michelle	Turner, Paul	turner, robert	Turner, Ronnelle
Turner, Scott	Turner, Stephanie	Turner, Tami	Turner, William	Turner-nitz, Natasha	Turnwald, Ian
Turock, Sharon	Turrentine, Bonnie	Turunen, Niina	Turvey, Kevin	Tusken, Sally	Tuszynski, Blake
Tutihasi, R-Laurraine	Tuttle, Christien	Tuttle, Effie	Tuttle, Warren	Tutwiler, Denise	Tuveson, Carol
Tuveson, Greg	Twaddle, Maria	tweddle, allen	Tweed, Victor	Tweten, Bob	Twine, Jeff
Twiss, cathy	Twitchell, Eugenia	Tworek, Ania	txar, demi	Tyburski, Sara	Tyler, Cyndy
Tyler, Donald	Tyler, Jason	Tyler, Kelsey	Tyler, Ph.D., Margaret G.	Tyler, Wesley	tylich, ruth

Tylo, Terri	Tymkiw, Liz	Tynan, David	tynan, kelly	Tyndale, Selene	tyndall, carl
Tyndall, Lucy	Tyner, Kris	Tyner, Robin	Tyre, Loraine	Tyree II, James	Tyrrell, Edwin
Tyrrell, Larry	Tysinger, Richard	Tyson, Carole	Tyson, Kathleen	Tyson, Keith	TYSON, MANDY
Tyson, Nathan	Tzakis, Marlena	Tzianis, Nicole	Tzugaris, Chrystie	U, J	U. family, The
Uba, Beata	Ubaydova, Roksana	Udall, Nicholas	Udaykee, Leslie	Udel, Lisa	Ugalde, Kenneth
Ugolik, Lori	uhl, jerri	Uhl, Robert	Uitti, Joyce	Ukaga, Chukwuemeka	Ukman, Vicki
Ukryn, Jay	Ulibarri, David	Uline, Andrea	Ullman, Elizabeth	Ullman, Susan	ulloa, jennifer
ulloth, Jane	Ullrick, Elizabeth	Ulman, Barry	Ulman, Clair	Ulmer, Gene	Ulreich, Judith
Ulrey, Larry	ulrich, penny	Ulrop, Laurie	Uma, Dinesh	un, tolga	underwood, Edward
Underwood, Gary	Underwood, Lena	Underwood, Todd	Ungaro, Francine	Unger, Charles	Unger, Diana
Unger, Elda	unger, jennifer	unger, kris	Unger, PCC, Pamela	Unger, Peg	Unruh, Jerry
Unseld, Monica	untalan, meris	Unterreiner, Robert	Upchurch, Brooke	Updegrove, Charles	Updike, Barbara
Updyke, Sarah	uppgaard, heidi	Upton, Holly	Urban, Heidi	Urban, Paul	Urban, Rae
Urban, Terrie	Urban, Tory	Urbanek, Adele	Urduja, Teresa	Urevick, Camille	uri, pam
Urias, Victoria	Uribe, Sandra	Uribe, VERONICA	Urquhart, Alexandria	Urquhart, Helen	Urquhart, Steven
Urquieta, Priscilla	Urruela, Eric	ursillo, raymond	Urso, Massimiliano	Usahanun, Waltraud	Usami, Chris
Ustenko, Katya	utami, sylvani	Utt, Virginia	Utton, Beth	UVA, ALICE CAROL	Uyenishi, Steve
Uzamere, Cheryl	v dongen, wil	V., Susan	VACA, jenny	Vacca, Giancarlo	Vaccarella, Cameron
Vaccari, Simonetta	Vaccaro, John	Vaccaro, Lauren	Vacirca, Robert	Vadopalas, Erika	Vaghetti, Adriana
Vaglia, John	vagnini, maureen	vahed, shaheda	Vai, Thomas	Vail, Cameron	Vaillancourt, Michele
Vakhshoury, Afsaneh	Vako-Graves, Andrea	Vala, Verna	Valachovic, Eileen	Valachovic, Eileen	Valance, Liberty
Valastro, Alexa	Valastro, Cecile	Valdes, Dulce	Valdes, Nancy	valdez, amy	valdez, carlos
Valdez, Cori	Valdez, Hailton	Valdez, LeeAnn	Valdez, Lissete	Valdez, Maria	valdez-Loqui, Jocelyn
Vale, Ivy	Vale, Katherine	Vale, Sonsire	valecic, SANJA	valencia, alan	valencia, evelyn
Valencia, Lissette	Valencia, Mandy	valencia, rio	Valencia, Suzanne	Valencour, sandy	Valencour, Thomas
Valenti, Frank	Valentin, Kenneth	Valentin, Marie-Therese	Valentinah, -	Valentine, Ellen	Valentine, Karen
Valentine, Kellie	Valentine, Kelsie	Valentini, Karen	Valentino, Jen	Valentino, Ron	Valenza, Charles
Valenziano, Linda	Valenzuela, Frances	valenzuela, gilbert	Valenzuela, Wendy	Valera, rico	valette, denise
valianti, Deborah	Valiente, Betty	Valiga, Susan	Valint, Carol	Valle, Bryanna	Valle, Ellen
Valle, Kathryn	Vallee, Joan	Vallejos, James	Vallender, Andrew	valles, Rosemary	Valles, Serena Marie
Valli, Michele	Valls, Tonya	Valney, Shirley	Valtri Burgess, Vivian	Valzania, Elaina	Valzania, Elaina
Van Aman, Linda	Van Anglen, Trixanna	Van Asten, Michelle	Van Beveren, Chris & Jim	Van Bree, Gretta	Van Camp, Barbara
van Camp, Richard	Van Clief, Stephanie	Van Dam, Chad	Van De Sompele, Rene	van de Velde, Veerle	van de Woestijne, Johanna
Van Dellen, Marian	van den Berg, Gerben	van den blink, kieren	Van Den Steene, milca	van der Heyden, Madeleine	van Dongen, J.J.
Van Dusen, Jan	Van Dyke, Carol	Van Dyke, Theresa	van dyne, willis	Van Embden, Laura	Van Epps, Kathie
Van erp, Else	van Gils, Piet	van Gorder, Peter	Van Grinsven, David	Van Gundy, Lauren	Van Haalen, John
van Hartesveldt, Patricia	Van Hemme, Tasha	Van Holt, Mary	van Hoorik, Michiel	Van Horn, John	Van Kirk, Garry
Van Leekwijck, Natalie	Van Leekwijck, Natalie	Van Leuven, Phyllis	van Lingen, Gabriele	van manen, nathalie	van Megen, Rosalind
Van Note, Randy	van Oppen, Marilyn	Van Ormer, Diana	Van Oudenhoven, Steve	Van Pelt, Julia	Van Riper, Michael
Van Roekens, Peter	Van Sandt, Michael	van sant, sandy	Van Scoten, Brenda	Van Skike, Marlene	Van Steeter, Mark
Van Steinburg, John	van Stelten, Savana	van Straelen, Francoise	Van Surksum, Sofia	van Tol, gerard	van Tol, Maud
van Tol, Miranda	Van Tuyle, Karen	Van Uytrecht, Paul	Van Vactor, Nicholas Harwood	Van Valkenburgh, Mark	Van Vorous, Heather
Van Walsen, Barbara	Van Way, Debra	Van Wicklen, Betty J.	van wijngaerden, martine	Van Zant, Peter	Van Zant, Sandra
Van Zee, Ali	Van Zile, Dorthy	van zomer, lara	Vanacore, Eric	Vanacore, Eric	VanArsdale, Michell
Vanas, Gilbert	Vanassche, Mary	VanBerkom, Earl and Margie	VanBlarcom, Priscilla	vanbuggenhout, viviane	VanBuren, Bernadette
VanBuskirk, Paula	Vance, Eric	Vance, Patricia	Vance, Renee	vance, stephanie	Vancelette, Tim

VanCleve, DAvid	vandahl, bette	Vandal, Lise	Vandaveer, Charlotte	Vandegrift, Eric & Debra	VandeGrift, Julia
Vandemoortele, Robin	Vandenberg, Grace	Vander Heyden, Joanne	Vander Veen, Shirley J	Vanderbilt, Christa	Vanderbilt, Matia
Vanderbosch, Maureen	Vanderford, Chris	Vanderhill, Margo	Vanderhoff, Gerald	Vanderhorst, Fred	Vandermay, Lisa
Vandermeersch, Micheline	Vanderschaegen, Julie	Vanderslice, Tiffany	Vandine, Lisa	vandiver, amber	Vandiver, Diane
Vandrovec, Bryan	Vanek-Johnson, Ray	Vanellis, John	VanEssen, Sheila	VanGelder, Louise	vanhuijkelom, hans
Vania, Jennifer	Vaniotis, Nancy	vanmeter, susan	Vann, Kyle	Vann, Teri	Vanni, Fernanda
VanNorman, Kendara	VanNostrand, Montie	vannoy, sue	Vanos, Nona	VANSEER, MARIETTE	VANSINDEREN, Jacqueline
Vanvalkenburg, celia	VanWinkle, Jean Marie	VanZee, Lee	Varanitsa, Oleg	Varcoe, Donna D	Varellas, Dorothy
varg, rosana	Varga, Barbara	Varga, Dolores	Varga, John	Varga, Martha	Vargas, DC
Vargas, Giselle	Vargas, Janet	Vargas, Lorenzo	Vargas, Maria	Vargas, Maria	vargas, mildred
Vargo, Gabriel	Vargo, Rachel	Varguez, Michelle	Varnedoe, John	Varner-Sheaves, Donna	varney, Chris
Varon, Joseph M.	Varricchio, Marilyn	Vartigian, Lori	Vasaturo, Gaylene	Vasaturo, Ronald	Vasil, Alyse
Vasil, Karissa	Vasilauskas, Tasha	vasiliadou, glykeria	vasiliki, Georgikopoulou	Vasque, Garoldina	Vasquez, Anna
Vasquez, Nancy	Vassallo, Giovanna	Vassilakidis, Pat	Vastine, Keri	Vatousiou, Mark	Vatter, Sherry
Vaughan, Bob	Vaughan, Carolyn	Vaughan, Deborah	Vaughan, Kathryn	Vaughan, Linda	Vaughan, Lisa
Vaughan, LJ	Vaughan, Marsha	Vaughan, Paul	Vaughn, Amy	Vaughn, Jenny Lee	Vaughn, Kevin
Vaughn, Kimberly	Vaughn, Margaret	Vaughn, Martina	Vaughn, Matt	Vaught, Kevin	vaurs, Nicole
vavrek, sally	vayda, judie jo	Vayda, Karen	vayenas, sheila	Vayian, Jules	vazquez, andrea
Vazquez, Esmeralda	Vazquez, Jessika	Vazquez, Kate	Vazquez, Patricia	Vazquez, Shayna	Vazulik, Jean
Veach, Deb	Vearling, June	Veatch, Jill	veckerelli, michelle	Vedenhaupt, Sharon	Vedovi, Nancy
Veek, Marie	Veenstra, David	Vega, Alejandra	Vega, Jill	Vega, Laura	Vega, Manuel
Vega, Rosario	Vega, Veronica	Vega, Vivian	vega, yomara	Vega-Siferd, Virginia	Vehmeier, Lori
veirs, m	Veit, Sara	Veitch, Cynthia	Velarde, Mario	Velasco, Consuelo Serena	Velasco, Giovani
Velasquez, Alexa	Velasquez, Andrea	Velasquez, April	Velasquez, Belinda	Velasquez, Maria	velasquez, sara
Velazquez Vazquez, Michelle	Velazquez, Ethan	Velazquez, Jennifer	Velechovsky, Natalie	Velez Linares, Juan Martin	Velez, Damian
Velez, Damian	Velez, Francisco J.	Velez, Greg	Velez, Katherine	Velez, Maira	Velez, Michael
Velez, Quiana	Velky, Natalia	Velner, John	Veloo, Uma	Veloz, Amy	Veltkamp, Robert
VELVICK, JOAN	Vena, Skip	Venable, Chanda	Venable, Eileen	Venable, Katherine	Venable, Laurel
Vencill, Matthew	Vencko, Petric	Veney, Julie	Venezia, Frank	Venezia, Sherri	Venezio, Glen
Venezio, Glen	Venn, Gael	Venne, Kim	Venning, Allison	Vento, Jillian	Ventura, Ann
Ventura, Claudia	Ventura, Daniela	Ventura, Joni	ventura, maria	VERA, FELIX	Vera, Laura
Veraldi, Anne	Verber, Nancy	Verberkmoes, James	VerBerkmoes, Krien	Verbiar, Beth	Verbos, Nick
Verbos, Nick	Verbridge, Tara	vercknocke, pascal	Verderaime, Lilly	Verderber, Julian	Verdet, Paule
Verdicchio, Carol	Verdolini, Nancy	verdu, sharie	Verduyn, Sebastian	verga, enrico	Vergara, karen
Vergara, Raven	Vergin, Ute	Verito, Frank	VerKamp, Lizabeth	Verna, Diane	vernan, joe
Vernon, Douglas	Vernon, Margaret	VerNooy, Jen	Versace, Jill	verser, susan	Versocki, Demetra
versteegh, ron	Verstraete, Frank	Verzino, Sima	Verzosa, Paul	Vesce, Aldona	Vesely, Carolyn
VESEY, STEPH	Vespa, Gary	Vesper, Paul	Vessicchio, Anthony & Susan P.	Vessicchio, Anthony P.	vestias, Eusebio Manuel Vestias pecurto
Veteran, Janice	Vezzetti, Elena	Viacrucis, John	Viana, Mena	Viator, Marilyn	Vice, Daniel
viceri, doug	Vician, Doris	Vick, Jennifer	Vickers, Jill	Vickers, Margaret	Vicknair, Dawn
Vicknair, Steve	Vickrey, Edna	Vickstrom, William	Victor, Daniel	Victor, Sue	victoria medina, josefina
Vicuna, Steve	Vidales, Victor	Videen, Pam	Vieira, AwayNoFwdsStars	Vieira, AwayNoFwdStars	Vieira, Barbara
Vieira, Ed	Viell, Gu	Viera, Kelly	Viergutz, Julie	Vieth, Janice	Viets, Lila
Viga, Nancy	Vigil, RM	Viglione, Brian	Vignapiano, Gregory	vignaud, marie laure	Vignere, Joel
Vignet, Stephen	Viktorchik, Sheila	Vilches, Paul	Viles, Aaron	Viljoen, Christina	Villa, Alicia
Villa, Melva	Villagrana, Crystal	Villalobos, Cecilia	Villalpando, Juan	Villani, Seb	Villanova, Carolyn
Villanueva, Angela	VILLANUEVA, IRENE	Villanueva, Lorena	Villar, Denice	Villar, Michelle	Villarnovo, Victoria
Villarreal, Hilda	Villarreal, Noe	Villasana, Gloria	villasenor, stephanie	Villaume, Mary	Villegas, Clara

Villegas, Judy	Villegas, Paula	Villegas, Rey	Villeneuve, Michele	Villeneuve, Todd	Villers, Vaitsa
Villodas, Abigail	Vilmar, Michelle	vince, james	Vincent, A.K.	Vincent, Carol	Vincent, Gail
Vincent, Joe	Vincent, Joseph	Vincent-Cowan, Paula	Vinciguerra, Cathy	Vincil, Melinda	Vindigni, Cesare
Vinecourt, Jean Marie	Vineski, Patricia	viney, james	Vineyard, Celeste	vining, cindy	Vining, Ernest
Vink, Martha E	Vinkler, Matthew	Vinogradova, Olga	Vinson, Dusty	Vinson, Katherine	Vinton, Janine
Violante, Michael	Viragh, Brea	visciglio, Mary	Viscuso, Marivana	Vise, Pam	Visioli, Lori
Vita, Deborah	Vital, Sybille	vitale mandich, rebecca	Vitale, Anna	Vitale, Diane	vitale, elizabeth
Vitale, Rebecca	Vitello, Maria	vito, Ann	vitovec, joann	Vitro, Mary	Vivanco, Jesus
viveros, evan	Viveros, Joy	Viveros, Miroslava	Vizzi, Jillian	Vlacich, Amy	Vlahovich, Nikola
Vlasak, Teri	vlasiadis, andreas	Vlasopolos, Anca	Vlastou, Gayner	Vlcek, Janice	VN, Sujith
vo, d	Vo, Stephanie	Vodantis, Stephen	Vodrey, Vicki	Voegele, James	voeltz, tim
voet, jim	Vogel, Adam	vogel, david	Vogel, Fran	Vogel, James	Vogel, Jan
Vogel, Janny	Vogel, JW	Vogel, Michael	Vogel, Natalie	Vogel, Ralph & Beryl	Vogel, Richard
Vogel, Steven	Vogel, William	Vogelman, Carol	Vogt, Diethild	Vogt, Eleanor	Vogt, Fred
Vogt, Susan	Vogt, Warren	Vohs, Marilyn	VOICEfortheVOICELESS, Miriam	Voigt, Susan	Voiles, Cheryl
Voland, V	Volansky, Kelly	VOLBART, laurence	Voldal, Erik	volga more, katrina	volk, deborah j
Volk, Suzanne	Volk, Toni	Volkmann, Shanti	Vollers, Ted	Vollmer, Alex	Vollmer, Terry
volpe, joe And Mary	volpon, donatella	von Abele, Melitta	von freymann, amy	von Grone, Antoinette	von Hippel, Peter and Josephine
von Hoffmann, Mari	Von Huben, William	von Kampen, Michele	von Kleinsmid, Peter	Von Pichl, Mercedes	von Rohr, Margaret
Von Stetten, Krista	Von stoddard, Dunja	VonDeLinde, Kathleen	VonDohren, Norma	Vonn, S	Voorhies, Bill & Marilyn
Voorhies, Eric	Vora, Ruchir	Vorachek, Mary	Vorderbruggen, KathyVorderbruggen	Vorse, Stephanie	Vorstermans, Matthew
Vos, Jo	Vosberg Hider, Patricia	Vosburgh, Vani	Vosmik, Christine	Voss, Cassandra	Vossoughi, Siamak
Voter, NC	Voves, Deborah	Voves, Deborah	Voyles, Tamara	Voytas, Paul	Vrambout, Maryse
vrana, margaret	Vrancart, Charlotte	Vrba, Tracy	Vredevelt, Candice	Vreeland, Mollie	Vrusho, Spiro
vs, a	Vu, Quyen	Vu, Steve	Vujin, Jelena	vulic, davor	Vuu, Sarah
Vuyas, Victor	Vvggg, Vvvv	Vyatchanin, Arkady	Vyatchanin, Evgenia	Vyhnal, Kristin	W, Cheyenne
w, g	W, John	W, Nickie	W, Suzan	W, V	W., Angel
wa, Ken	Wachelka, Mary	Wachowiak, Kenneth	wachowski, vanessa	Wachter, Ruth	Wachtler Ciccia, Durrell
Wacker, Diane	Waddington, Jack	Wade, Alliston	Wade, Amanda	Wade, Cloicec	Wade, Emily
Wade, Gayle	Wade, Gf	Wade, Heather	wade, iain	WADE, JULIE	Wade, Karen
Wade, Marcia	Wade, Mary	Wade, Richard	Wade, Victoria	Wadsworth, Andrew	wadsworth, ralph & molly
wadsworth-reyes, jane	Wagers, Charlie	Waggaman, Jeanne	Wagner, Amanda	Wagner, Angelina	wagner, charles
wagner, donna j	Wagner, Ellen	Wagner, g blu	Wagner, Geraldine	Wagner, Inge	Wagner, Jamie
Wagner, Jena	Wagner, Kenneth	Wagner, Matthew "Elvis"	Wagner, Michael	Wagner, Paula	Wagner, Rita
Wagner, Robin	Wagner, Russ	Wagner, Sandra	Wagner, Scott	Wagner, Scott	Wagner, Stephanie
Wagner, Tasha	Wagner, Theodore	WAGNER-STARLEY, CHRISTIE	Wagtmann, Maria Anne	Wahbe, Elizabeth	Wahl, Russell
Wahle, Lisa	wai ling, liu	Waibel, Ann	Waine, Linda	Wait, E	Wait, Elizabeth
Wait, Karen	Waite, Elizabeth	Waite, Marj	Wakefield, Marie	Wakefield, Marie	Wakely, Sam
Waker, Pamela	Waksmonski, Lisa	Wala, Antoni	Walberg, Jeriene	Walbridge, Charles	Walby, J
Walcott, Donna	Wald, Aloysius	Wald, Gilbert	Wald, Phyllis	Walden, Karen	Walden-Forrest, Karyn
Walden-Hurtgen, Leah	Waldron, Carla C	Waldron, Elizabeth	Waldron, janice	Waldroop, P	waldrop, Jon
Waldroup, Linda	Walenga, Robin	Wales, Martha	Wales, Tim	Waleski, Mel	waleski, melanie
Walker III, Robert S	Walker, Beverly	Walker, Carol	walker, carolyn	Walker, Celene	Walker, Charlotte
Walker, Dawn	Walker, Donna	Walker, Donna	Walker, Felicia	Walker, Isabelle	Walker, Jasmin
Walker, Jeffrey	Walker, Jennifer	Walker, Jillian	Walker, Joan	Walker, Julie	Walker, June
walker, lee	walker, marcia	Walker, Margaret	Walker, Marie	Walker, Mary Pat	Walker, Michael

Walker, Michelle	Walker, Patti	Walker, Phylisha	Walker, Quay Anthony	walker, reshonda	Walker, Robin
Walker, Shannon	walker, sierra	Walker, Susan	Walker, Susan	Walker, Sydni	Walker, Tara
Walker, Todd	Walker, Tracy	Walker, William	Wall, Alexa	wALL, AVERY	Wall, Clare
Wall, Deborah	Wall, Jean	Wall, Laura	Wall, Nancy	Wall, Teresa	Wall, Thomas
Wallace, Amy	wallace, antonio	Wallace, Christopher	Wallace, Cody	Wallace, D	Wallace, Deborra
Wallace, Don and Jacky	Wallace, Donald	Wallace, Kelly	Wallace, Lauren	Wallace, Lee	Wallace, Leslie
Wallace, Mark	Wallace, Matt	Wallace, Nadine	Wallace, Robert	Wallace, Stephen	Wallach, Aleta
Wallach, Donna	Wallach, Lorna	wallen, carol	Wallen, Lawrence	Waller, Don	Waller, Julia
Waller, Sarah	Wallerstedt, Terry	walley, janet	Wallila, Don	Wallis, Janice	Wallis, Tracy
Walls, DaAnna	Walls, Faye	Walls, Janet	Walls, Mary	Walls, Paulette	Walser, Debra
walsh, alexa	Walsh, Ann	Walsh, Denise	Walsh, Denyse	Walsh, Erich	Walsh, Gerry
WALSH, Helen	Walsh, Julianne	Walsh, Kelly	Walsh, Kevin	Walsh, Lisa	WALSH, PATRICK
Walsh, Ricki	Walsh, Ruxy	Walsh, Thomas	Walsh, Tom	Waltasti, Marilyn	Walter, Amy
Walter, Beverly	Walter, Gail	Walter, George	Walter, Kathy	Walter, Kenneth	Walter, Shirley
Walter-Fromson, Ann	Walters, Amy	Walters, Ben	Walters, Bobbi	walters, carol	Walters, Chris
Walters, Christy	Walters, Denise	Walters, Ernie	Walters, Heather	Walters, Jo	Walters, Kari
Walters, Patrica	walters, teri	Walters, Terie	Walton, Aaron	Walton, James	Walton, James C
Walton, Marcia	Walton, Velinda	Waltrip, Laura	Walz, Kenneth	Wan, Sara	Wanbaugh, Erika
Wance, Nancy	Wandel, Thomas	wandsnider, brittney	Wanenmacher, Erika	Wang, Mei	Wann, Sheila
Wann, William	Wanninger, Steve	Wanser, Heather	Warburton, Rebecca	Ward, Albert	WARD, ALLY
Ward, Alyce	ward, angela	Ward, Beth	Ward, Brenda	Ward, Catherine	ward, dalila
Ward, Dana	Ward, Daniel	Ward, Dave	Ward, Elizabeth	Ward, Gail	Ward, Garland
Ward, Joamma	ward, joann	Ward, Joshua	ward, k	Ward, L. Maeve	Ward, Marvin J.
Ward, Nancy	ward, pam	ward, pam	Ward, Ralph	Ward, Sally	Ward, Samantha
Ward, Shay	Ward, Sheila	Ward, Sheila	Ward, Terrence	Ward-Doma, Dawn	Wardell, Jennifer
Wardell, Kate	Warden, Jessica	wardlaw, lovie	Wardwell, Clair	Wardwell, Edward and Anne	Ware, Debra
Ware, Melissa	Ware, Sherry	Warfield, Melissa	Warfle, Jamee	Warhol, Tom	Waring, Alysa
Warkentine, Terry	Warkoczewski, Marlene	Warlick, Nancy	warnecke, kerstin	Warner Sr., Phillip	Warner, Alan
Warner, Chezna	Warner, Gayle	Warner, Joan	Warner, Kelly	Warner, Nadine	Warner, Robbin
Warner, Sheila M.	Warntjen, Jens	Warren MSPT, ATC, OMT, Russell J.	Warren RN, Donald	Warren, Angela	Warren, Anne & Susan
Warren, Byron	Warren, Craig	Warren, Craig	Warren, Deborah	Warren, Eva	Warren, Jeanette
Warren, Jennifer	Warren, Kay	Warren, Laura	Warren, Linda	Warren, Michael	Warren, Patricia
warren, pjacob	Warren, Roxanne	Warren, Teresa	Warren, Vic	Warrington, Thomas	wartick, lorene
Wartmann, Jacqueline	warwick, e	Warwick, Scott	Warwick, Wanda M	Wasfi, Ellen	Wasgatt, Ann
Washburn, Malinda	washenko, Karenmarie	Washington, Chris	Washington, Christine	Washington, Marie	Washington, Michael
Washington, Wayland	Washington-White, Jane	Washum, William H.	Wasielewski, Alison	Wasielewski, Margaret	Wasko, Christine
Wasko, Tara	Wasner, Colleen	Wason, Peter	Wassell, Eleanor	Wassell, Rebecca	Wasser, Corinne
Wasserman, Barbara	Wasserman, Kurt	Wasserman, Sawyer	wasson, mark	Watada, Tracy	Watanabe, Astrid
Watanabe, Hiroe	Waterfield, Don	Waterman, Glenna	Waters, Brenda	Waters, Dan	Waters, Elizabeth
Waters, Jennifer	Waters, Melissa	waters, michael	Waters, Nan	Waterworth, Laura	Waterworth, P. D.
Wathen, Wayne	Watkins, Charley	Watkins, Dore	Watkins, India	Watkins, Katrina	Watkins, Regina
Watkins, Renee	watson, angela	Watson, Blythe	Watson, Bob	Watson, Bryan	Watson, Carrie
Watson, Claudia	watson, debra	Watson, Diane	WATSON, DONALD	Watson, Donnell	Watson, Erica
Watson, Gail	Watson, Harold	Watson, Jesse	Watson, Kelly	Watson, Libbett	watson, lisa
Watson, Maryann	Watson, Michael	Watson, Michelle	Watson, Nick	Watson, Paula	Watson, Robert
Watson, Sandra	Watson, Sharon	Watson, Theresa	Watson, Traci	Watson, Virginia	Watt, hania
Wattenbarger, Don	watters, cheryl	Watters, Erin	watters, whitney	Watts, Barb	Watts, Carolyn
Waugh, Kym	Waxman, Jonas	Way, Carla	Waybourn, Kim	Wayman, Frank	Wayne, Susan
Wayne, Susan	Wayner, Claire	Weate, John	Weatherford, BethAnne	Weatherford, Lochlan	Weatherhead, Morwenna
Weatherholt, Mark	Weatherly, Brooke	Weathers Price, Stacey	Weatherwax, Nancy	Weaver, Andrew	Weaver, Barry

Weaver, Carol	Weaver, Clare	Weaver, Cori	Weaver, Dick	Weaver, George	Weaver, Hannah
weaver, heather	Weaver, Hollie	Weaver, Jennifer	Weaver, Jeremy	Weaver, Jordan	Weaver, Laura
weaver, Marykay	Weaver, wes	Weaver, William	web, kari	Webb, Charles	Webb, Claire
Webb, Dottie	Webb, Judy	Webb, Kimberly	Webb, Marilyn	Webb, Martha	Webb, Maureen
Webb, Michelle	Webb, Patricia	Webb, Robin	Webb, Rohan	Webb, Sandra (Sandy)	Webb, Shannon
Webb, Tristyn	Webb, William C.	Webber, Rosemary	Webber, Sheila	Weber, Bonnie	Weber, Brenda
Weber, Ellie	Weber, Frances	Weber, Helen	Weber, Kristin	Weber, Lilian	weber, lori
Weber, Lorraine	Weber, Mary	Weber, Nicole	Weber, Priscilla	Weber, Priscilla	Webre-Asbar, Teresa
Webster, Allison	Webster, Bernadette	Webster, Chris	Webster, Cindy	Webster, Deborah	Webster, Howard
webster, roswitha	Webster, Stacy	Webster, Steve	Wechsler, Susan	Weckbaugh, Susan	Weckman, Deborah
wedding, connie	Wedel, Elizabeth	Wedemeyer, Jessica	Wedow, Vernon	wee, meeling	Weed, Brenda
Weedman, Ruth	Weekes, Kate	Weeks, Robin	Weeman, Clare	Weems, James	Weerasuriya, Ananda
Weesner, Katherine	Wegener, Elfriede	Wegerle, Carol	wegner, angelika	Wehmeyer, Gary	Wehner, Ron
Wehr, Joan	Wehr, Paula	wehr, sara	Wehrli, Joni	Wei, Annie	Wei, Annie
Weichler, Pauline	Weidema, Sue	Weidenbenner, Sage	Weigand, James	Weigel, Alice	Weigel, Elonna
Weigle, Karen	Weijer, Jennifer	Weikel, Wendy	Weil, Ed	Weil, Helene	Weil, Therese
Weilage, Nan	Weiler, Debbi	Weil-Martin, Carla	Weimar, Ashley	Weimer, Margie	Wein, Eryn
Weinberg, Henry	Weinberg, Rebecca	Weinberg, Rita	Weinberger, Daniel	Weinberger, Deborah	Weinfeld, aislyn
Weingarten, Roger	Weingeist, Carol	Weinhold, Richard	Weinland, Mary	Weinstein, Diane	Weinstein, Diane
Weinstein, Elyette	Weinstein, Ethan	Weinstein, Hannah	weinstock, jason	weinstock, lesley	Weir, David
Weir, Diane	Weir, Joyce	weir, leslie	Weirick, Cynthia	Weis, James	Weis, Joe
Weis, Marguerite	Weis, Marie	Weisbrich, Jocelyn	Weise-Baez, Constance	Weisel, Bonnie	Weisel, Nancy A.
Weisenburger, Nicholas	Weisfeld, Marsha	Weishahn, Carolyn	Weisheimer, Bella	weisheit, alan	Weishew, Nancy
Weiske, Lynne	Weisman, Dh Sc, CEO, Dr. Eric	Weisman, Leslie	Weismantle, Donna	Weiss, Barry	Weiss, Charlotte
Weiss, Dolores	Weiss, Eric	Weiss, Jennifer	Weiss, Jonathan	Weiss, Leslie	Weiss, Morgan
Weiss, Paul	Weiss, Rebecca	Weiss, Richard	weiss, ron	Weiss, Stuart	Weiss, Valerie
Weisser, Mark	Weissman, Glen	Weitzel, Brenda	Weitzman, Judy	welanko, Philip	welborn, roberta
Welbourn, Susan	Welch, Colleen	Welch, Janet	Welch, Joanna	Welch, Nancy	Welch, S.
Welch, Shirley	Weldon, Louise	Weldon, Matthew	Weldon, Richard S.	Weldon, Wendy	Welker, Joyce
Welkis, Jamie	Weller, Frances	Weller, Penny	Weller, Steve	Welles, Melanie	Welles, Sue
Welling, Leonard	Wellington, Mary	Wellington, Patricia	Wellman, Marilyn	Wellner, Pam	Wells, Anne
Wells, Brandy	Wells, Cheryl	Wells, Daniel	Wells, Diane	Wells, Dianne	Wells, Francis
Wells, greeley	wells, harold	Wells, Joann	Wells, Joann	wells, keith	Wells, Kerry
wells, kristina	Wells, Lasha	Wells, Mike	Wells, Mona	Wells, Nancy	Wells, R
Wells, Robert	Wells, Rosa Lee	Wells, RoseMary	wells, stacey	Wells, Susan	Welsh, Echo
Welsh, Kathleen	Welsh, Meghan	Welsh, Robin	Welte, Valarie	welteroth, Christina	Welzbacher, Megan
Wen, Maia	Wendel, Patricia	Wendelin, S	Wendt, Ingrid	Wendt, Lynne	Wener, Tina
Wenger, Beverly	Wengronowitz, Elisabeth	Wenks, Rebecca	Wenner, Martha	Wenning, Cecelia	Wenrich, Ray
wensauer, larry	Wensel, Beth	Wentworth, Katherine Alex	Wentworth, Kimberly	Wentz, Patricia	Wenzel, Christopher
Wenzel, Joseph	Wenzel, Joseph	Werbowsky, barry	Werderits, Janet	Werkstell, judith	Werly, Patricia
Wermers, Johanna	Werner, Angelina	Werner, Elizabeth	Werner, Katherine	Werner, Lisa	Werner, Lucy
Werner, Rosemarie	Wertheim, Michael	Wesley, Amber	WESLEY, DONA	Wesley, Eliouse	Wesley, F. Robert
Wesley, Laura	Wesley, Robert	Wesley, Sheryl	Wesoky, Sharon	Wesoski, Marion	Wess, Ralf Arno
Wessinger, Rosie	Wessman, Eric	Wesson, Alex	Wesson, Frances	Wesson, Jeffery	West, Alice
west, anne	West, Cameo Lyn	West, Carolyn	West, Deborah	West, Diane	West, Eloise
West, Eric	West, Jack	West, Jennifer	West, Jim	West, John	West, Judy
West, LaShell	West, Lynda	West, Mark	West, Paul	West, R.A.L.	West, Rakar
WEST, ROBERT	West, Ronni	West, Sue	West, Tej	Westbay, Jennifer	Westbrook, Elena
Westbrook, Julia	WESTBROOK, LINDA	Westbrooks, Rickey	Westenhoefer, Judy	Western, Amber	Western, Raymond
Westfall, Steve	westlake, kim	Westman-Cherry, Melissa	Westoby, Jacky	Westra, Jennifer	Westrom, Geraldine
Westwood, Kaya	West-Yordanov, Donna	Wetteland, Signe	weuler, Carol	Weyand, Michael	Weyer, Diane

Whalen, Lisa	Whalen, Maureen	Whalen, Michele	Whalen, Moira	Whalen, Sue	Wharton, Cindy
Whatley, Jennifer	wheatley, A	Wheatley, Janet	Wheaton, Joyce	Wheeland, Allen	Wheeler de Guss, Katherine F.
Wheeler, Barbara	wheeler, Brenda	Wheeler, Bruce	Wheeler, Dawn	wheeler, jennifer	Wheeler, Jennifer
Wheeler, Jessica	Wheeler, Jessica	Wheeler, Kassie	Wheeler, Ken	Wheeler, Mark	wheeler, mary
wheeler, michelle	wheeler, terry	wheeless, amy	Whelan, M. A.	Whelan, Maria	wheleer, Natalie
Wherley, Nancy	Wherrit, Thamar	Whetstine, Linda	Whetstone, Preston	whetton, ava	Whetzel, Clare
whetzel, Heidi	whidden, Lisa	Whillock, Laurel	whip, daquan	Whipple, Darrel	Whipple, Delecia
Whipple, Kris	whipple, lisa	Whipple, Patricia	Whipps, Elizabeth	whirlow, christine	Whisenhunt, Rodney
Whitacre, Julie	Whitaker, Autumn	Whitaker, Dakota	Whitaker, Jessica	Whitaker, Maria	Whitaker, Mary Jo
Whitaker, Penny	Whitaker, Robert	Whitcher, Nicole	Whitcomb, D.E.	White Quiñones, Deanna	White, Aileen
White, Ann	White, Ann	White, Barbara	White, Bruce	white, cameron	white, carole
White, Cay	White, Charmaine	White, Christina	White, Corinne	White, David	White, Dawne
White, Delores	White, Denise	White, Elizabeth	White, James	White, Janet	White, Jeffrey
White, Jessica	White, Joanna	White, Jolene	white, josh	White, K.	white, karen
White, Katherine	White, Kathy	White, Kim	White, Kim	white, Kris	White, Laura
White, Laura	White, Linda	White, Lois	White, Lois	white, Lynette	White, Maria
White, Mary	white, Mary Pat	White, Melissa	White, Melissa	White, Melodie	White, Michael
White, Mindi	White, Nancy	White, Nancy	White, Nancy	White, Patricia	White, Peggy
White, Peggy	White, Ray	White, Rebecca	White, Rebecca	White, Rob	White, Scott
White, Seema	white, sunshine	White, Tiffany	White, Tom	White, Trina	White, Ursula
White, William	White, Yana	White, Yvonne	Whited, Rebecca	Whitefield, Elaine	Whitehead, Carla
WHITEHEAD, CRYSTAL	White-Henry, T.W.	Whitehouse, Judy	Whitehouse, Lynda	Whitehurst, Carol	Whitehurst, Carol
Whitelaw, Kristin	Whiteman, David	Whiteside, Jane	Whiteside, Sherryl	Whiteway, Chris	Whitewolf, phoenix
Whitfield, Amy	Whitfield, Jessica	Whitford, Ann	whiting, geoff	Whiting, Jerry	Whiting, Laurel
Whitlock, Charlotte	Whitlock, Jeff	whitlock, liam	Whitlock, Patricia	Whitlow, Elizabeth	Whitman, Fanny
whitman, fran	WHITMIRE, CINDY	Whitmore, Arleen	Whitmore, Robert	Whitney, Dana	Whitney, Desiree
whitney, kathy	Whitney, Michael	Whitney, Pamela	Whitney, Stephanie	Whitsitt, Barbara	Whitson, Barbara
Whitt, Valerie	Whitted, Cathy	Whittemore, Sewall	Whitten, Janet	Whittier, James L. (Jim)	Whitting, Ksenia
Whittingham, Monica	Whittington, Joe	Whitton, Erika	Whitton, Matt	Whitworth, Jim	Whitworth, Sheri
Whyte, Mariah	Wiant, Jean	Wiberg, Christina	Wibright, Eddy	Wichert, Geoff	Wichmann, Ann
Wichmann, Sharon	wichowski, chet	Wicht, Dan	Wick, Frederick	wick, jodi	Wickberg, Richard
Wicke, Blanche	Wickeham, Emily	Wicker, R David	Wickham, Donald	wickline, diane	Wickre, DJ
wickwire, Mary	widlowski, Richard	Widmer, Joyce	Wiebenson, Sarah	Wieck, Brittany	Wiedemann, Janna
Wieder, Jonathan	Wiederhold, Joe	wiedlhofer, birgit	wiehemeijer, Robert	Wieland, Chuck	Wieland, Martin
Wielgosz, April	wiencek, Vanessa	Wiener, Ann Elizabeth	Wienert, John	wier, JANICE	Wierckx, Willa
WIERIG, VICTORIA	wierzbinski, kathy	Wiesbauer, Lisa	Wiese, Ila	Wiese, Katherine	Wiesenthal-Gold, Ruth Ann
Wiesner, Amy	Wiesner, John	wiesner, leesa	wiest, jo	wiest, pieter	Wieszczecinski, Elizabeth
Wigeland, Patricia	Wigetman, Susan	Wiggin, Deborah	Wiggins, Christina	Wiggins, Lorna	Wiggins, Nancy
Wight, Darin	Wight, Darin	Wightman, Kevin	Wightman, Richard	Wihlm, Fanny	wiinblad, joanie
Wiker, Toni	Wilbanks, Floyd	Wilber, Leah	Wilbourn, Michael	Wilbourn, Pam	Wilbur, Leslie
Wilbur, Lynn	wilburn, kathy	Wilburn, Patricia	Wilcox, Anthony	Wilcox, C.	Wilcox, David
Wilcox, David	Wilcox, Lisa	Wilcox, Marta	Wilcox, Mary	Wilcox, Sara	wilcox, wandis
Wild, Carrie	Wild, Martha	wilday, ruth	Wilde, Deena	wilde, michelle	Wildensee, Kristin
Wilder, Alyson	Wilder, Ciara	Wilder, Cynthia	Wilder, Darryl	wilder, ike	wilder, sara
Wilder, Tamara	Wildfong, William	Wildman, Whitney	Wilds, Gabrielle	Wilds, Shelly	Wildung, Eric
Wileman, Misty	Wilen, David	Wiley, Carol	Wiley, Jan	Wiley, Jennifer	Wiley, Joseph
Wiley, Kimberly	Wiley, Kimberly	Wiley, Patricia	Wilfing, Janice	Wilford, joe	Wilhelm, Elizabeth
Wilhelm, George	Wilhelm, Jean	Wilhite, amy	Wilhjelm, Hannah	Wilk, Samantha	Wilken, Dorothy
WILKEN, Sara	Wilkerson, Jere	wilkerson, Julie	Wilkerson, Kriste	Wilkerson, Shelly	Wilkes, Elizabeth
Wilkins, Hannah	Wilkins, Jaci	Wilkins, Marcelle	Wilkins, Rebecca	Wilkins, Richard	Wilkinson, Art
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Wilkinson, MaryAnn	Wilkinson, Rhett	Wilkinson, Wayne	Wilks, Sheleen	Will, Anna	Will, Brandie
Will, Jennifer	Will, Rebecca	willborn, darlene	Willer, Ani	Willer, James	Willets, Laurie
Willett, Nan	Willette, Debby	Willette, Thomas	Willey Halpin, Wanda	Willey, Irene	Willi, Katie
Williams, Aaron	Williams, Adrienne	Williams, Adrienne	WILLIAMS, Al	Williams, Alexander	Williams, Angela
WILLIAMS, ANN	Williams, Anthony	Williams, Audrey	Williams, Bonnie	Williams, Brigida	Williams, Cadence
Williams, Carole	Williams, Caroline	Williams, Carrie	Williams, Catherine	Williams, Cathy	Williams, Charity
williams, charlene	Williams, Charles	Williams, Charles	Williams, Chelsi	Williams, Chris	Williams, Christine
Williams, Debbie	Williams, Debbie	Williams, Debbie	Williams, Deborah	Williams, Dianne	Williams, Donald
Williams, Donna	Williams, Dyke	Williams, Eden	Williams, Emma	Williams, Erinn	Williams, Faith
Williams, Faith	Williams, Felicia	Williams, George	Williams, Harvey	Williams, Hope	Williams, Howard
Williams, Jake	Williams, Jana	Williams, Jeaneane	Williams, Jeanette	Williams, Jeffery	Williams, Jennifer
Williams, Jericho	Williams, Jerry	Williams, Jimmy	Williams, Joan	Williams, Joanne	williams, john
Williams, Joseph and Diane	williams, karen	Williams, Katherine	Williams, Kathleen	Williams, Kathy	Williams, Kathy
Williams, Kelli	Williams, Khadijah	Williams, Kim	Williams, Kimberly	Williams, Kimtraila	Williams, Laura
Williams, Linda	Williams, Linda	Williams, Linda	Williams, Linda	williams, Lindsey	Williams, Lyn
Williams, Marianne	williams, mark	williams, mary	Williams, Mary	Williams, Mary A	Williams, Melissa
Williams, Michaela	Williams, Nancy	Williams, Norman	Williams, Patricia	Williams, Patrick	Williams, Paul
Williams, Richard	Williams, Rob	Williams, Robert	Williams, Robert	Williams, Rodney	WILLIAMS, RODNEY
Williams, Roger	Williams, Roger	Williams, Ronika	Williams, Rosangela	Williams, Rosemeka	Williams, Roxanne
WILLIAMS, S	Williams, Sabine	Williams, Sandra	Williams, Sandy	Williams, Sara	Williams, Shaun
Williams, Sherri	Williams, Steph	Williams, Susan	Williams, Suzanna	williams, suzanne	Williams, Sylvia
Williams, Ted	Williams, Ted	Williams, Terrie	Williams, Terrie C.	Williams, Thomas Dennis	Williams, Tishauna
Williams, Tyler	Williams, Wade	Williams, Wendy	Williams, Yvonne	Williamson, Andrea	Williamson, Christina
Williamson, Debbie	Williamson, Deborah	williamson, Eric	Williamson, Faith	Williamson, Ginger	Williamson, J.C.
Williamson, Jaclyn	Williamson, Jacqueline	Williamson, Kiyoshi	Williamson, Kristen	Williamson, Laura	Williamson, Sandra
Williamson, Tessa	Williamson, Tracy	Williard, Linda	Williard, Linda	Willingham, Jada	Willingham, Tom
willis, bridget	Willis, Jennifer	Willis, Jim	Willis, Joe	Willis, Judy	Willis, Margaret
Willis, Patricia	Willis, Theresa	Willis, William	Willitts, Terrence	Willmott, Roger	Willner, Daniel
Willoby, Randolph	Willoughby, Emily	Willow, Jamie	Wills, Margaret	Wills, Maureen	Wills, Sally
Wills, Susan	wills, toni	willsey, savahna	Willson, Clyde	Willson, Lauren	wilmot, sharron
Wilmoth, Bryan	Wilmoth, Carole	Wilmoth, Charles	Wilp, Ludger	Wilsey, Denise	Wilsin, Sam
Wilsnack, Jonathan	WILSON SR, ROBERT G	Wilson, Allison	wilson, angela	wilson, arlene	Wilson, Barbara
Wilson, Brad	Wilson, Brenda	Wilson, Brittany	Wilson, Carol	Wilson, Carolyn	Wilson, Connie
Wilson, Cynthia	Wilson, Danny	Wilson, Darla J.	Wilson, Debie	Wilson, Debra	wilson, Declan
Wilson, Devon	Wilson, Don	Wilson, Ellen	wilson, gladys	Wilson, Greg	Wilson, Helen
Wilson, Jacob	Wilson, Jacqueline	Wilson, James	Wilson, James	Wilson, James	Wilson, Jan
Wilson, Jane	Wilson, Jenna	Wilson, JoEllen	wilson, Judith	Wilson, Judith	Wilson, Judith
Wilson, Julia	Wilson, Julie	Wilson, karen	Wilson, Kay	Wilson, Kent	Wilson, Kim
Wilson, leilani	Wilson, Lena	wilson, linda	Wilson, Lisa	Wilson, Lucy	Wilson, Lynda
Wilson, Margo	Wilson, Mary	Wilson, Mary Ellen	Wilson, Megan	wilson, michela	Wilson, Mitch
Wilson, Pamela	Wilson, Pat	Wilson, Patricia	Wilson, Paul	Wilson, Pudda	wilson, richard
Wilson, Richard	Wilson, Robert	Wilson, Samantha	Wilson, Sandra F.	Wilson, Sarah	Wilson, Sharon
wilson, sherita	Wilson, Sherri	Wilson, Sheryl	Wilson, Shre	Wilson, Stacy	Wilson, Stella
Wilson, Stephen	Wilson, Steve	Wilson, Steven	wilson, sue	Wilson, Thomas	Wilson, Tina
Wilson, Troy	wilson, winn	Wilson, Wynne	WilsonFurr, Mindy	Wilson-Perry, Kelly	WILT, KM
Wilton, Laraine	Wimmer, Ethel	Wimmer, Martin	Winburn, Samantha	Wincek, Joseph	Winchel, Becki
Winchester, Brenda	Windett, Shelly	Windham, John	Windle, Holly	Windsor, David	Windwalker, Joseph + Sandra
Wine, Jordann	wine, judith	Winebrenner, Joyce	Winegar, Karin	Winemiller, Megan	Winemiller, Stephen
winfield, madeleine	Winfield, Shannen	Winfrey, Bobbiejo	Wing, Gail	Wing, Janet	Wing, Marjorie
Wingert, Deborah	Wingert-Loomis, Pamela	winhooltz, betty	Winkel, David	Winkel, Marguerite	Winkelman, Susan

WINKELMAYER, pat	winkler, B	Winkler, Diane	Winkler, Tanya	Winn, Marcia	Winner, Angelika
winnett, mitchell	winnick, joie	Winnicki, Kristine	Winnie, Linda	Winograd, JP	Winser, MM
Winskie, Anne	Winslow, Colette	Winslow, Colette	Winslow, Deborah	Winslow, Lee	Winslow, Tyler
Winstanley, William	Winstead, Annie	Winstead, C	Winstead, Nicholas	Winston, Leslie	Winston, Yvette
Winter, Meredythe	winter, sandra	Winter, Shannon	Winterer, Katrin	Winters, Aleksandra	Winters, Drusilla
Winters, Elizabeth	winters, jane	Winters, Kenneth	Winters, Leanora	Winters, Mary	Winters, Ronald
winters, valerie	Wintjen, Robin	Wiper, Hailey	Wire, Jarod	Wirges, Maria	Wirt, Winton
Wirth, Charles	Wirth, Charles	Wirth, Jessica	wirth, joanne	Wirth, Lisa	Wirth, Mark
Wirth, Theodore	Wirthgen, Kathryn	Wirtz, Elizabeth	Wirtz, Tod	Wisch, Anita	Wise, Carissa
Wise, Catherine	Wise, David	Wise, John	Wise, Julie	Wise, Rita	Wiseman, Ann
Wiseman, Carol	Wiseman, Wendy	Wisk, Michael	Wismer, Bruce	Wisniewski, David	Wisniewski, Lisa
Wissa, Brenda	Witczak, Kris	Witham, Lisa	Witham, Wyanell	Withers, Lynell	Withington, Julia
witkowski, lauren	Witkus, Karen	Witmer, Tiffany	Witt, Kelly	Witt, Kristen	Witte, Stephanie
Wittig, Patricia	Witting, Laurel	Wittkopp, Serena	Wittlinger, Jennifer	Wittstadt, Kurt	Witzel, Susan
Witzl, Tamara	wizowski, kendra	Wladich, Michelle	Wlosowicz, Teresa	Wobus, Elizabeth "Betsy"	Wochinger, Wendy
Wodicker, Cassandra	Woehl, Jane	woehrle, denise	Woelbing, Susanne	Woersching, Marc	woessner, william
Wofford, Kathryn	Wohlberg, Robert	Wohlsein, Harry	Woitkoski, Andrew	Wojack, Cynthia	Wolanin, Lynn
Wolcott Bosworth, Tiffany	Wolcott, James	Wolf, Arlene	Wolf, Bernard	Wolf, Cheyenne	Wolf, Chris
Wolf, Cleo	Wolf, Crystal	Wolf, Darlene	Wolf, Debbie	Wolf, Debra	Wolf, Erika
Wolf, Esther B.	wolf, Heather	Wolf, James	Wolf, Jessica	Wolf, John	Wolf, Kristel
Wolf, Martin	Wolf, Nevada	Wolf, Paul	wolf, pauline	Wolf, Robert	Wolf, Robert
wolf, rohana	Wolf, Teresa	Wolf, Wesley	Wolf, Wright	Wolfe, Alisa	Wolfe, Amy
Wolfe, Ann	Wolfe, BarbarA	Wolfe, Cynthia	Wolfe, Heather	Wolfe, Irene	wolfe, jacqueline
Wolfe, Janice	Wolfe, Jeanette	Wolfe, Jimmie	Wolfe, Leticia	Wolfe, Mark and Nancy	Wolfe, Megan
Wolfe, Michael	Wolfe, Nancy	Wolfe, Raphaella	Wolfe, Sherry	Wolfe, Stephen	Wolfersteig, Judy
wolff, alex	Wolff, Rita	Wolff, Tobias	Wolfgang, Sara	Wolford, Cheryl	Wolfram, Maria A
Wolfrey, Kathleen	Wolfsohn, Edward	Wolfson, Laura Esther	Wolfson, Melissa	Wolinsky, Susan	wolk, michael
wollan, sara	Wollard, Carla	Wolle, Marilyn	wolle, Rita	woller, lyn	Wollman, Barbara
Wollscheidt, Allen	Wolny, Rose	Wolongevicz, Patricia	Wolski, Thomas	Wolslegel, Marianne	Wolstenholm, Rhonda
Wolt, Daniel	Wolter, Annie	wolter, carolyn	Wolter, Manuela	wolter, manuela	Woltz, Susan
Wolz, Donna	Wombacher, Roberta	Won, Lucy	Wong, Angela	Wong, Carol	Wong, Debi
wong, jennifer	Wong, Lawrence	Wong, Marley	Wong, Meixuan	Wong, Sophie	Wong-Brehmer, Janene
Wontor, Debra	Woo, Jennifer	Wood, Amy	Wood, Carolyn	Wood, Cornett	Wood, Crystal
Wood, Dale	Wood, Dianna	Wood, Elizabeth	WOOD, FELECIA	Wood, Heidi	Wood, Ilsa
Wood, Jane	Wood, Jessica	Wood, Joy	Wood, Judy	Wood, Karen	Wood, Katie
Wood, Laura	Wood, Laura	Wood, Levi	Wood, Mary	Wood, Megan	wood, melissa
Wood, Peter	Wood, Phillip	Wood, Regina	Wood, Richard	Wood, Rochelle	Wood, Sandy
Wood, Sarah	Wood, stacey	Wood, Virginia	Woodall, Christina	Woodall, Sandra	Woodard, Bennie
Woodard, Elena	Woodard, Grant	woodard, jud	Woodard, Kenneth	woodard, kimberly	Woodard, Merryl
Woodbridge, Zoë	Woodbury, Anne	Woodbury, Ellen	Woodcock, Debra	woodfin, Kelly	Woodhouse, Alejandra
Woodin, Peg	Woodland, Charlotte	Woodland, Joan	Woodrich, Charles	Woodruff, Anita	Woodruff, Ellen
Woodruff, Jan	Woodruff, Kathy	Woodruff, Sandria	woodruff, shareen	Woods, Bill	Woods, Jim
Woods, Julie	Woods, Leola	Woods, Meisha	Woods, Mikeal	Woods, Nancy	Woods, Pamela
Woods, Robert	Woods, Robin	Woods, Rocquelle	Woods, Roth	Woods, Thomas	woodward, barbara
Woodward, C. Archer	Woodward, Laurie	Woodward, Sherry	Woodward, Stanley	Woodworker, bria	Woodworth, Ashley
Woodworth, Donald	Woodyard, John	Woodzell, Leslie	Wooldridge, Andrea	Woolery, Alex	Woolford, Ronald
woolingon, Richard	Woolley, Amy	Woolly, Jim	Woolsey, Amber	Woolums, Vince	Wooten, Deborah
Wooten, Mara	Wooten, William	Wootson, Deborah	Worcester, Chris	Word, Terry	Worden, James
Worden, Kathleen	Workman, Mary	Workman, Patricia	WORKSMAN, STANLEY	Worley, David	Worley, Don

Worley, Tiffani	Wormser, Maisie	Worrell, Jennifer	Worsham, Kim	Worsham, Nancy	Worstell, Rodney
Wortham, Michael	Wortham, Victoria	Worthen, Courtney	wotipka, john	Wotzka, Kelsey	woychio, duane
Woytysiak, Mary	Wozniak, Kelly	Wozniak, Laura	Woznicki, Michael	wozny, rebecca	wrage, william
Wrathall, Sheila	Wray, Nancy	Wren, Ashley	Wrensch, Norman	Wrice, Tami	Wrich, Dana
Wright, Alan	Wright, Ann	Wright, Barbara	Wright, Beth	Wright, Brenda	Wright, Caleb
Wright, Dale	Wright, Darleen	Wright, Donald	Wright, Dr. Wayne & Susan	Wright, E. Lynne	Wright, Faith
Wright, Georgina	Wright, Glenn	Wright, Heidi	Wright, Huron	Wright, Janis	Wright, Karen
Wright, Katherine	Wright, Katherine	Wright, Kathleen	Wright, Kenneth	Wright, Kenneth	Wright, Kent
Wright, Laurie	Wright, Lisa	Wright, Madeline	Wright, Mary	Wright, MD, Elisabeth	wright, michelle
Wright, Paula M	Wright, Penelope	Wright, Phil	Wright, Preston	Wright, Pris	wright, raquel
Wright, Robert	Wright, Samantha	Wright, Sandra	Wright, Sandra	Wright, Sarah	Wright, Shannon
Wright, Sue	Wright, Susan	wright, susan	Wright, Trigg	Wright, Vanria	Wright, Warren
Wright, Wes	Wright-Sharp, Jennie	Wrightsman, Lenora	Wrigley, Geralyn	Writz, Gina	Wrobel, Amy
Wrobel, Charlene	Wroblewski, Jane	Wroblewski, Janet L	Wu, Kuang	Wu, Lu	Wuebbenhorst, Diane
WUENSCHER, MARTIN	Wuerslin, Theodore	Wulf, Maureen	wulff, shelly	wulff, sonya	Wunder, Kristina
Wunderlich, Eileen	Wurglitz, Tenley	Wurtz, Betty	Wushensky, Sharon	Wusterbarth Brown, Sandy	Wyatt, Aimee
Wyatt, Jill	Wyatt, Karen	Wyatt, Linda	wyatt, patrice	Wyckoff, Eleanor	Wyer, D
Wykle, Stacy	wykowski, patricia	Wylie, Carolyn	wylie, Chandra	Wylie, Gail	Wylie, Mary
Wylldestar, Cornelia	Wyman, Carolyn	Wyman, Elizabeth	Wyman, Emily	Wyman, Lawrence	wyman, tom
wymetal, alexandra	Wynkoop, Margot	WYNN, DOROTHY	Wynn, Gayle	Wynn, Mary	Wynne, Dwayne
wynveldt, dora	Wyrick, Brenda	wyse, margo	wysocki, Melissa	Wziontka, Julia	xavier, marjorie
Y, Misa	YACOWITZ DRAGAN LPN BA, SUZANNE	Yaeger, Kimberly	yaeger-pierson, marylee	Yahia, Susie	Yahna, Cynthia
Yamase, Laura	yancey, robert	Yandell, Mary	Yanez, Guadalupe	Yanez, Jennifer	Yanez, Lorenzo
yang, jay	Yang, Mandy	Yang, Qingqing	Yang, Sara	yanke sr, herbert	Yanke, Brian
Yanoff, Steven	YANTES, JEFF	Yantselovskiy, Alexandr	Yaple, Maddy	Yaplee, Jeffry	YARBER, OREN
Yarbrough, Edward	Yarger, Dana	Yarnell, Susan	YARTER, E C	Yarwood, Mary	yascolt, Susan
Yasgur, Eleanor	Yash, Cheryl	Yaskell, Tina	Yate, Jane	Yater, Joan	Yates, Christof
Yates, Cindy	Yates, Joan	Yates, Paula	Yates, Stephen	Yatsko, Karen	Yatsko, Karen
Yattsonsky, Joan	yavuz, jenny	yazell, jeremy	Ybarra, Annabel	Yeager, Carolyn	Yeager, Denese
Yeager, Jerry	Yeager, Jo	Yeager, LouEllyn	Yeager, Will	yearwood, derek	Yearwood, Kim
Yeates, Amanda	YEAUGER, DOLLY	Yeckley, Melissa	Yedinak, Pat	Yee, Anthony	Yee, Bonnie
Yelen, Barry	Yelich, Mary	Yelle, Susan	Yellin, Paula	Yelluri, Nikhita	YELTON, JERED
Yelton, Kayla	Yelverton, Lora	Yeno, Kathleen	Yenoki, George	Yeomans, Gary	Yeoumans, Brian
Yerby, Leanne	Yerden, Carol	yergeau, christine	Yerger, Sandra	Yermak, Iris & Patty	Yeung, Alexander
Yi, Hana	Yi, Hana	Yisrael, Yoninah	Yll, Judy	Yn, Heidi	Yoakum, Robin
yocham, samantha	Yoder, Larry	Yoder, Pat	yoerger, Ronald	Yogev, Yonit and Leon	yoham, Cassandra
Yohn, Amber	Yokoyama, Holly	Yonder, Sarah	Yonnone, George	Yoon, Jinah	Yopp, Andrew
Yorba, Ashley	Yorgason, Laurence	Yorgason-Quinn, Diane	YORK, GAY	York, Kaitlin	york, kathi
york, mary	York, Traci	Yoshida, Larry	yoshino, trudie	Yoshiyama, Lane	Yosowitz, Hillary
Yost, Christian	yost, lily	Yost, Viviana	Yothers, Carol	You, Sam	Youmans, Ben
Young, Amanda	Young, Brenda	Young, Carl	Young, Carol	Young, Cheryl	Young, Cheryle
young, david	Young, David	Young, Don	Young, Doug	Young, Frederic	Young, Gayle
Young, Howard	Young, James	Young, jean	Young, Jeffery	Young, Jerry	Young, Joanne
Young, Kathryn	Young, Keri	young, kyle	Young, Lance	Young, Linda	Young, Lowell
Young, Lowelll	Young, Margaret	Young, Mary	Young, Mary	Young, Mary	Young, Mary-Kay
Young, Miranda Allison	Young, Nancy	Young, Paul	Young, Phil	young, rebecca	Young, Robert C
Young, Roberta	Young, Roy	Young, Ruby	Young, Sandra	Young, Sharon	Young, Stephen
Young, Steven	Young, Sue	young, Theresa	Young, Trudy	Young, Violet	Young, William

Youngbauer, Amy	Youngberg, Deborah	Youngblood, Clay	Youngblood, Kimberly	Young-Martin, Camille	Youngquist-Thurow, Miriam
Youngs, Alex	Youngs, Howard	Youngs, Howard	Younk, Jason	Yount, Lyn	younts, troy
Yourke, Charlene	Yovella, Debra	Yows, Jeanine	Yu, Dominick	Yucel, Eren	Yuen, Lois
Yunis, Mona	Yunus, Robert	Yurcik, John	Yurgaites, Julie	Yuriar, Dominic	Yurkovitch, Paula
Yuruvich Arias, Barbara	Yuzawa, G	Z, Leah	Z, Leslie	Z., Nina	Zaccagnino, David
Zaccagnino, Ellen	Zacchino, Stephanie	Zachar, Cecelia	Zacharis, Alison	Zachary, Valerie	Zachmann, Alice
Zachos, Helen	Zack, Christine	Zack, Elaine	Zack, Mary	Zadaca, Joy	Zadzilka, Toni
Zaebst, Jennifer	Zafar, Sobia	Zafsky, Fred	Zagata, Darlene	Zager, Linda	Zago, Andrea
Zagula, Loraine	Zahakos, Jim	Zahgkuni, Jennifer	Zahnle, Kenneth	Zahos, John	Zahra, Raymond
Zais, Julie	Zajac, Amy	Zajac, Andrea	Zajac, Elizabeth	Zajicek, Jennifer	Zakharova, Irina
Zaldivar, Sofia	Zalesak, Margie	Zalinski, Eddy	Zaltana, Flavia	Zalusky, kate	Zaman-Zade, Rena
Zamarripa, Diana	Zamarron, Genoveva	Zambon, Paolo	Zambrana, Mary	Zambrano, Darlenys	Zamecka, Natalia
Zamkoff, Sharon	Zamora, Claudia	Zamora, Margarita	Zamora, Marlene	Zamora, Oscar	Zamorano, lenea
Zamor-Cassidy, Virginia	Zamorski, Cindy	Zampino, Robert	Zamudio, A.	Zamullo, Anna	Zanata, Karen
Zancan, Anna	zander, patti	Zandonella, Liza	Zanley, Joyce	Zanney, Shawna	Zanotti-Wilson, Sandra
zaoutis, Irene	Zapata, Ethel	Zappa, Leyno	zappa, zoe	Zaragoza, Nicole	Zarcone Alston, Holly
Zaret, Cortney	Zaricor, Dorien	zarif, rashida	Zarkhosh, Helia	Zarowin, Marc	Zart, Marguerite
Zarzycka, Alexandra	Zaslow, Ken	Zatsepa, Victoria	Zaustinsky, Julia	Zavadil, Laura	Zavadsky, Viktor
Zavala, Leo	Zavalney, Darlene	Zawadzki, C	Zawaski, Joan	Zawodny, Joseph	Zaylia, Jessica
Zdenek, Diana	Zdroik, Clayton	zebracki, nancy	Zech, Gisela	Zeeley, Elisa	Zehel, Rae
Zeidan, Nisreen	Zeiger, Dinah	ZEigler, A	Zeisler, Deanna	Zeitoun, Julie-Louise	Zekis, Christopher
Zelasko, Sandy	Zelcer, Brook	Zelenak, Gail	Zelinski, Dawn	Zelinski, Lisa	Zeller, Cara
Zeller, Dawn	Zeller, Michael	Zeller, Rudy	Zellmer, Kevin	Zellner, Angie	Zellner, Scott
zelmanovich, silvana	Zelter, Daniel	Zemaitis, Jean	Zeman, James	Zemel, Andrea	Zendzian, Paul
Zenner, Sharon	Zentarski, Joan	Zentura, *	zepeda, robin	Zerbato, Erminio	Zerbini, Ericka
Zerebny, Christopher	zerfoss, carol	Zerger, Connie	Zerman, Leslie	Zerr, Gary	Zerr, Laura
Zgrabik, Alysha	ZHANG, JIAZHU	Zhang, Raymond	Zhang, Xinhan	Zheng, Dong	Zhu, Michael
Zhuravleva, Elena	Ziama, Kristin	Zibordi, Barbara	Zich, Arden	Zickler, Connie	Zide, Harris
Ziegler, Herbert C.	ziegler, russ	Ziegler, Russell	Ziehm, Debrah	zieleskewicz, wendy	Ziemann, Ilse
Ziemba, Cassandra	Ziemba, Jason	Ziemer, Stephanie	Zierikzee, R.	ziervogel, ezekiel	Zies, Ray
Ziesemer, Gerald	Ziesmer, Grace	Zietek, Dariusz	Zile, Inga	Zilius, Charlene	Zillioux, Eden
Zillioux, John	Zimbleman, Kandice	Zimiles, Martha	Ziminski, Peter	Zimmer, Arlene	Zimmer, Louise
Zimmerman, Becky	Zimmerman, Diana	Zimmerman, doreen	Zimmerman, Ellen	Zimmerman, Hannah	Zimmerman, Jane
Zimmerman, Janet L	Zimmerman, Jaxson	Zimmerman, Julie	Zimmerman, Laura	Zimmerman, Lauren	Zimmerman, Laurie
zimmerman, marlene	Zimmerman, Melissa	Zimmerman, Nancy	Zimmerman, Paulette	Zimmerman, Susan	Zimmermann, Adele E
zimmermann, udo	Zimny, Gloria	Zinda, Brad	Zingg, Barbara	zink, lydia	Zinn, Andrea
Zinn, John & Sandy	Zinn, Robert	zintel, angelika	Ziober, Dennis J	Zirker, Joseph	Zissu, Thomas
Zito & Family, Nola	Zizza, Daniel	Zmuda, Malgorzata	Zo, Paula	Zoeter, Mark	Zoettlein, April
Zoglin, Robert	Zohar, Ingrid	Zoldak, Loretta	Zolezzi, Deidra	Zoll, Donna	Zollars, Jan
Zolotar, Gena	zona, gloria	Zonfrillo, Josie	Zook, Dr. Donna	Zornig, Marianne	Zotos, Bonnie
Zoubi, C. Voni	Zoz, Madison	Zozaya, Evangelina	Zrust, John	Zsiros, Kathy	Zuba, Renee
zubani, marilena	Zuber, Jenifer	Zuber, Margaret	Zuber, Michael	zucht, chrysta	Zucker, Marguery Lee
Zuckerman, Arlene	Zuckerman, Arlene	Zuckerman, Sandra	zuckerman, sandra	Zuckermann, Irma	Zuckermann., Dr.Emil and Monika
ZULIAN, BRUNA	Zulliger, Barbara	Zumalt, David	Zumi, Alice	Zuniga, Arleen	zuniga, nicole
Zupancic, Jodie	Zuppann, Ann	Zurak, Nikola	zwarun, judy	zwez, mary	Zwick, Larry
Zwick, Sandy	Zylberberg, Maxine				

FL2 Clean Harbor-1

Comment FL2-1

Dear Mayor Jack Durney, Hoquiam City Council, and City Manager Brian Shay:

Don't allow crude oil in Grays Harbor!

Our community can't afford an oil spill or explosion. The recent accidents across North America – from West Virginia to Ontario – show how dangerous it is to transport crude oil through our communities and over our waterways. These accidents have impacted people's drinking water, homes, schools, jobs, and even lives, as seen with the deaths of 47 people in the tragic lac Megantic, Quebec accident.

The three terminals being proposed in Grays Harbor are located in an earthquake-prone area and a tsunami zone, and the trains would have to travel through neighborhoods and along vulnerable waterways. The risk is too big. Please keep our community safe and ensure that the terminal proposals in Grays Harbor do not move forward.

Response to FL2-1

Refer to the Master Response for Purpose and Focus of the EIS. For information about the analysis of tsunami and earthquake risks, refer to the Master Responses for Seismic Risk and Design Requirements and Earthquake Probabilities.

Table 7-4. Names Associated with Citizens for a Clean Harbor-1 Form Letter

Billings, Sally	Blubaugh, Eunice	Coates, Denise	Eastwood, Cheryl	Fantz, Karen
Gaidrich, Mrs. Dora	Knestis, Judy	Kyle, Jean E	Longenbaugh, Miles	Ogren, Lynn
Schneider, Sylvia	Seele, Eugene B	Stephenson, Arlene	Wierman, Sandy	Williams, Donald

FL3 Clean Harbor-2

Comment FL3-1

Dear Mayor Jack Durney, Hoquiam City Council, and City Manager Brian Shay:

Don't allow crude oil in Grays Harbor!

The recent crude oil train derailments and oil spills across North America underscore the high level of danger that oil treansport brings to Northwest communities and waterways. These accidents impact people's lives, homes, schools, jobs, and drinking water, as seen with the deaths of 47 people in Lac-Magantic, Quebec. Our communities can't affor an oil spill or explosion.

The three terminals being proposed in Grays Harbor are located in an earthquake-prone area and a tsunami zone, and the trains would have to travel through neighborhoods and along vulnerable waterways. The risk is too big. Please keep our community safe and ensure that the terminal proposals in Grays Harbor do not move forward.

Response to FL3-1

For information about the analysis of tsunami and earthquake risks, refer to the Master Responses for Seismic Risk and Design Requirements and Earthquake Probabilities.

Table 7-5. Names Associated with Citizens for a Clean Harbor-2 Form Letter

Andre, Cassie	Antrim, Karla	Ayres, Mark and Val	Bailey, Jerry & Pat	Barnes, Tim	Baynwell, Robin
Bedell, Frank H	Billhimer, Amy	Blake, Katy	Bowman, Wendy	Box, Ralph & Kay	Boyer, Morris & Nina
Brandstrom, Janice	Burke, George & Joann	Burrow, David C.	Campbell, Albert D.	Carlson, Joel	Charlop, Reed
Clay, Anne	Cook, James M	Cool, Deborah & Fred	Corin, Gordon & Olinda	Curry, Steve & Moore, Sharon	Davis, Gillian
Dawes, Warren & Janet	Don't allow	Estes, Alyssa	Feuerhelm, Jill	Flanagan, Burke	Forbes, Dave
Ford III, Robert M.	Gardener Milne, Lorree	Gire, Frances	Green-Debinske, Mary	Harburg, Mike	Hierholzer, Suzanne & Stephen
Holway, S.	Jensen, Robert	Kerseg-Hinson, June	Kronenberg, Esther	Lange, Valerie	Larson, John & Carrie
Ledgerwood, Lynn	LeVan, Eileen	Lewis, Dave	Males, J.R.	Manchester, Jennifer	Mayer, Melody
McKinney, Ray	Mills, Suzanne	Milne, Ricky W.	Milton, Beth	Osborn, Robert	Ouellette, Mr. Robin Earl
Panneton, Hali	Peterson, Anna M.	Price, Michael G.	Ramos, Ana	Rimer, Bill & Lisa	Ruyie, Susan
Scheidt, Bill	Schleger, Laura	Schnase, Thea	Sinclair, Sheri	Skinner, Wayne & Cathy	Steiger-McRae, Sean
Stullick, Connie	Thevik, Karen	Thevik, Larry	Wallace, Gordon E.	Warnken, Doug & Bonni	Weathersby, W
Whitton, Willow	Wood, Brian	Wood, Charlotte L.	Zeigler, Bob		

FL4 CQRC

Comment FL4-1

October 26, 2015

Dear Dept of Ecology & City of Hoquiam,

The findings in the DEIS for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and the environmental damage could be significant.

There is simply too much risk and too little reward from these proposals: Grays Harbor communities would take on the risk and oil companies would reap the profits, while Grays Harbor would become a throughway for oil going elsewhere.

Much of what makes Grays Harbor special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters.

The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line from Aberdeen to Chehalis and all the way to the source of the oil in North Dakota and beyond.

There are better way to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global

warming. Building more, big infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor.

I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.

Sincerely,

Response to FL4-1

Refer to the Master Response for Purpose and Focus of the EIS.

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport in the extended study area qualitatively. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks

Table 7-6. Unique Comments Associated with CQRC Form Letter

Commenter Name	Comment
Alderton, Janet	Westway and Imperium, two of three proposed oil terminals for Grays Harbor between Aberdeen and Hoquiam would have the combined capacity to handle nearly 127,000 barrels, or more than 5 million gallons of oil daily (one barrel = 42 gallons). The terminals would be fed by about sixteen loaded oil train deliveries every week (on average more than two per day). Grays Harbor is the wrong place for oil terminals: Much of what makes Grays Harbor special would be at risk. The narrow, shallow shipping channel and strong currents put Grays Harbor at high risk of an oil spill. A single major spill could devastate the area's maritime economy, productive fisheries, tribal treaty rights and spectacular coastal waters. If both terminals are built as many as 319 oil-laden tankers and barges would need to traverse Grays Harbor every year. The twenty-mile long Grays Harbor shipping channel is narrow, shallow, subject to strong currents and has limited staging area for ships and tugs. Up to an additional 319 trips through the Harbor by empty tankers and barges would only add to congestion and collision risk. The largest Panamax class tankers that would carry oil through Grays Harbor can hold nearly 17 million gallons and are nearly three football fields in length. The Exxon Valdez disaster in Alaska in 1989 spilled about 11 million gallons. The Washington State Department of Fish and Wildlife stated ? Grays Harbor is an area particularly sensitive to the adverse effects of oil spills.? A major oil spill could devastate marine resource jobs which support more than 30% of Grays Harbor?s workforce according to a 2013 study by the University of Washington. An economic study commissioned by the Quinault Indian Nation found that a major oil spill could put more than 150 tribal commercial fishermen out of a job, resulting in a direct loss of as much as $20 million in wages and up to $70 million in revenue for affected businesses. In 2014 Washington residents took an estimated 4.1 million trips to the Washington Coast spending $481 million. More than one-third of those visits were to Grays Harbor County to enjoy its spectacular and productive coastal and ocean waters. Grays Harbor and the region are no strangers to oil spills. The Northwest has experienced two dozen spills and near misses over the last two decades. In 1988, the Nestucca barge holed off Grays Harbor spilling 231,000 gallons of marine bunker oil, killing or injuring an estimated 56,000 seabirds. The oil sheen was seen from Oregon to the Strait of Juan De Fuca. If built the two terminals together could store 72 million gallons of crude, or the equivalent of 2526 oil tank cars. Grays Harbor sits in a major earthquake and tsunami zone. Geologists say the odds of a big Cascadia earthquake happening in the next 50 years are approximately one in three. The odds of the very big one are roughly one in 10. According to the U.S. Geological survey the overdue earthquake could produce waves from 20 feet to more than 100 feet high. We can expect that wall of water would

	topple storage tanks washing away all the oil which could possibly ignite. Oil train fires, explosions and derailments At least 10 crude oil trains have exploded recently in North America, including in July 2013 when an oil train accident in the province of Quebec killed 47 people. Between June 2011 and December 2013 a freight train derailed on average every 3.5 days in the Northwest region. There is no safe way to move oil by train: The tank cars that split open and burst into flames in Illinois in March 2015 were retrofitted to meet a higher safety standard than federal law requires according to railroad officials. The oil cars that derailed in West Virginia in February 2015, leaking oil into the Kanahwa River and burning down a house, were the newer 1232 cars that were supposed to be safer than the older DOT-111 models blamed for previous accidents. Air pollution, spills and traffic from oil trains Oil train spills hit record levels in 2014. In 2013 more oil spilled from trains into rivers, lakes, and marine waters than in the previous forty years combined. Increased rail traffic would almost double the emissions of pollutants from rail transport in the county. Parks and some homes near the project site could be exposed to higher levels of diesel particulate pollution shown to increase the risk of cancer, asthma and other respiratory ailments. Most of that diesel pollution from oil trains would be emitted near homes and businesses on a small section of tracks between Poyner Yard and the Westway and Imperium sites. In the City of Aberdeen, slow moving trains could block many streets at once, eliminating detour routes for first responders. Delays at Olympic Gateway Plaza could increase from between 49 and 70 minutes a day to between 96 to 112 minutes a day for the Westway project, and 108 to 138 minutes a day for the Imperium project. Sources: https://washington.surfrider.org/surfrider-releases-recreational-use-study-for-the-washington-coast/ http://daily.sightline.org/2015/02/23/grays-harbor-ship-traffic-the-impact-of-oil-plans/ http://thedailyworld.com/opinion/columnist/crude-oil-and-quakes-what-are-our-elected-officials-thinking http://www.seattletimes.com/opinion/grays-harbor-oil-terminal-would-threaten-quinault-indian-identity/ http://www.psr.org/chapters/washington/enviro-health/climate-change/position-statement-on-crude-oil-transport.html http://daily.sightline.org/2015/05/06/oil-train-explosions-a-timeline-in-pictures/ http://www.ecy.wa.gov/geographic/graysharbor/terminals.html http://www.theolympian.com/opinion/opn-columns-blogs/article31730856.html http://www.ecy.wa.gov/programs/spills/incidents/Nestucca/NestuccaHistory.pdf http://www.standuptooil.org/
Response: Comment acknowledged.	
Abrams, Kathleen	I grew up in Richland, and lived 30 years in Seattle. I now live in Indianapolis, IN. It was difficult to see Washington touting themselves as an environmentally sensitive state, and then have anti-environmental laws and decisions. Are you aware of the causes and effects of global warming? Are you a pawn of the corporations? Please put personal greed behind human survival...not to mention all the other life that is affected.
Response: Comment acknowledged.	
Alberts, Judith	I live just a few blocks from the port where the oil trains and shipments will be passing. An explosion in this vicinity would likely destroy my home and neighborhood and take many lives. All other considerations for why it would be a very bad idea to allow oil trains and ships in Grays Harbor pale by comparison to the worst case scenario I can imagine, which is death to people, structures, the environment, and the economy for this entire region. If these are not strong enough arguments against your proposals, then your profit motives trump life itself. Is that the legacy you want to leave for future generations?
Response: Comment acknowledged.	
Anderson, Glen	I appreciate the environment and ecosystems of the Grays Harbor area. I also appreciate the world's climate. I urge you to protect the local community and the world's climate.
Response: Comment acknowledged.	
Armstrong, Jude	Migrating shorebirds feed on small creatures in the mud of Grays Harbor. Some migrating shorebirds are decreasing in population numbers, most likely because of pollution in their wintering

	areas. For those long-distance-flyer species that depend on Grays Harbor almost exclusively to replenish their food reserves and prepare them for the second leg of their journey to their arctic nesting grounds, the possibility of encountering contaminated mudflats, could be lethal. Even though the birds may rest and feed in the harbor for only a few weeks each spring and for somewhat shorter periods in the autumn, the amount of contaminates from the food they would ingest would continue to accumulate with each visit to the harbor. The bivalves on which they feed, as long as they remain alive, would also accumulate the toxins in their tissues, until the point is reached where the entire mudflat smorgasbord is barren and the shorebirds are left to starve. Crude oil also impairs the ability of bivalves and snails to attach to a substrate, making them more likely to get carried away by currents or consumed by predators. Crude oil is notoriously and extremely persistent in the environment and can interfere with the health and life cycle of organisms for many years, posing continuing threats to the organisms that live in the harbor. Everywhere they occur, Red Knots appear to be extremely faithful to their sites, and would return, again and again, to the mudflats of Grays Harbor even as they continue to be poisoned by the crude oil contaminates. To this day, crude oil contaminants remain in Prince William Sound after more than 25 years! For a population of organisms that may be in decline, crude oil contamination could be the death knoll that ends with their extinction. The Pacific subspecies Calidris canutus roselaari, one of the numerous species that feeds in the harbor, has been recognized and listed by Canada as SARA Status: Schedule 1, Threatened. The population that migrate along the Pacific coast have likely been affected by the degradation of habitat in areas such as Grays Harbor (Washington). Further degradation by crude oil contamination would doubtless have grave effects on the birds. Calidris canutus roselaari have been proposed for listing in the United States. Available data suggest that the Pacific roselaari population has declined by about 60% since 1981. Although the gesture by the crude oil proponents to halt shipping activities for two weeks during the peak spring migration is welcome, it in no way alleviates the crisis that would befall the shorebirds if crude oil contaminants Grays Harbor. There is no mitigation measure that could alleviate the enormous damage and potential eradication of Calidris canutus roselaari. The permits for crude oil on Grays Harbor must be denied.The fate of Grays Harbor is extremely important to me, personally. I deeply resent the un-availability of 'hard copy' documents so that citizens can read, with some facility, the extraordinarily voluminous DEIS. Older eyes, like mine, find great difficulty in reading the documents on line. Yes, I know that some hard copies were distributed to some agencies and libraries, but that too, presents a handicap to senior citizens. No doubt there are fiscal considerations for DOE to make, but the cost of producing hard copies should rightly be at the expense of the proponents of the crude oil terminals. After all, it is people like me whose lives will be changed for the worse, if those oil companies prevail and gain their profits at our loss. You must, in future, accommodate this very involved portion of 'We the People of Washington'!
Response: See Response to FL1-1.	
Bachhuber, Stephen	With Congress incapable of action on CO2 pollution, and cumbersome regulatory processes developing in Washington, DC, it becomes necessary for local governments and jurisdictions to act in order to defend ourselves from the ravages of climate change. Grays Harbor will be vulnerable to sea level rise, and even in the best climate change scenarios, many areas of the Washington coast will be flooded. Therefore I call upon the Department of Ecology and the City of Hoquiam to reject permits for these terminals. It is necessary to take a long term view. Look past temporary increases in employment and tax revenue and see what is best for our children and grandchildren. Fossil fuel infrastructure is not the answer, and it will cost us dearly in the end.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Banks, Wesley	We do not want Washington to become the New Jersey or Louisiana of the west. Those states have so much pollution in the air and in the water that they are unhealthy.
Response: Comment acknowledged.	
Barrett, Karen	The incremental and comprehensive costs of using fossil fuels is no longer worth the risk to our planet!
Response: Comment acknowledged.	
Benkert, Kate	As a retired federal spill responder, I know how destructive the impact of a spill can be. Risking Bowerman Basin, a globally important migratory bird resource, is not worth it ecologically and economically.
Response: See Response to FL1-1.	

Bevacqua, Jennifer	The first step in getting out of a hole is to stop digging! We need to stop fossil fuel extraction and transportation... and instead promote healthy energy alternatives. Besides getting out of the hole, I do not want my family or friends placed at risk -- the risk oil terminals and transportation holds.
Response: Comment acknowledged.	
Bock, Christine	Besides, let's keep our oil here in the US, we definetely will need it in the future.
Response: Comment acknowledged.	
Brakke, Laura	Putting more tankers in in ocean shipping lanes will harm all fish and whale populations. The toxins the ships put out of their bilge pumps, the propeller wash and the likelihood of an Ocean spill goes up exponentially.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Breier, Rene	We don't want to risk massive oil spills. We don't want a massive harmful effect on our environment. Time to focus on alternative clean energy.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Campbell, Fred	I am very concerned about possible approval of the Westway and Imperium oil terminal proposals. My family and I have visited the Grays Harbor area repeatedly since the 50's, earlier generations long before that. Clearly the area has much to offer and no doubt you've been reminded of this in other similar comments. My point here is simply this. I don't want to see or experience the inevitable very negative impact of increased oil train and vessel activity in the harbor. The potential for some form of an accident is way too high. And the additional traffic certainly will diminish our joy in visiting the area. Obviously, there are self-serving economic interests that promote the value of the proposals for the larger community. But the true value to the community (especially in terms of jobs) is highly questionable. And even if a community economic value could be argued, the risk of very serious environmental and tourism damage is far too great. Therefore, I request that you reject the Westeay and Imperium Oil Terminal Proposals.
Response: Comment acknowledged.	
Carroll, Felicia	It is too great of a risk as the area is so important to migrating birds. And other wildlife as well especially the already stressed marine population.
Response: See Response to FL1-1.	
Clark, Christine	Respect and honor the indigenous and the current lands, waters, wildlife, and residents and do not ship our fossil fuels to other nations.
Response: Comment acknowledged.	
Detering, Brandt	As both a resident of Aberdeen and as an environmental scientist, oil trains are a significant personal concern. The risks of derailment, oil spills, environmental injustice, tribal treaty conflicts, and the local safety concerns far outweigh any fleeting benefits. I greatly oppose oil trains on our harbor. Beyond our community, the oil trains perpetuate carbon emissions by further subsidizing unsustainable energy use, rather than channeling our focus towards renewable energy.
Response: Comment acknowledged.	
Devlin, Felicity	The best move for Washington State's economy is to continuously demonstrate that we're forward-looking. And this means promoting clean, renewable fuels, not fossil fuels.
Response: Comment acknowledged.	
Dobson, Kim	If we allow these oil export schemes to be approved, we are complicit in a cascade of negative feedback into the climate changing CO2 emissions. The chain of events that the drilling, fracking (damage to potable water aquifers), rail transport, spill potential (damage to surface water, wetlands, streams and estuary ecosystems) hazardous emissions from the condensate rich Bakken Shale oil (benzene, toluene, Poly Aromatic Hydrocarbons cancer causing solvents). This proposal is just too much to gamble for the sake of short term profit that benefits a few wealthy oil investors and BNSF railroad and risks the long term health of the environment and climate atmospheric CO2 levels. Please do the right thing and deny the permit to Imperium and Westway!
Response: Comment acknowledged.	
Druffel, Pauline	I live close to the train tracks in Spokane and several times a day see the oil trains carry their dangerous load across a high bridge from which there has already been a derailment in the past. Fortunately then the rail cars were not tankers carrying volatile oil. Should a tanker car derail from that track or elsewhere from the raised tracks in downtown Spokane there would be an inferno. A

	large city high school with over 2,000 students, as well as 2 major medical complexes are in the impact zone.
Response: Comment acknowledged.	
Eddy, Mike	The social and environmental costs of burning fossil fuels are not represented in costs consumers see at pumps and meters. This represents a market failure. When carbon is properly priced, the market will choose renewable energy sources and policies. Stop cannibalizing Earth and start harvesting all the energy we could ever need from the sun.
Response: Comment acknowledged.	
Fasnacht, Sharon	Washington State's economy is its produce, and I understand oil trains are, and will, crowd out shipment of produce from eastern Washington, benefitting the oil industry - not Washington Industry. Farmers will go broke! DOE, farm produce is ecology too! Please protect our food source! Clean clear water is Washington's most precious ecological resource, as our globe warms! Our mountains provide our rivers, streams, creeks and lakes. One oil train wreck and we kill a life-giving source for years. DOE, save our clean water! It's your job! DOE, if a project doesn't support our state's goal to lead the nation in clean energy, don't permit it. You are there to protect Washington State's ecological systems (as you are trying valiantly to do at Hanford). And I support our feisty Department of ecology as it continues to do battle for our state.
Response: Comment acknowledged.	
Ferorelli, Josephine	Please reject the proposal for oil by rail in Gray's Harbor: the local and global dangers are real and unavoidable if the project is approved. So much in the Pacific Northwest depends on its beautiful waters and marine life that to gamble with the local risks of derailment, spillage, explosions, and the more widely distributed costs of CO2 emissions which worsen environmental dysregulation everywhere, but particularly in our oceans, is unethical as well as unwise. This is the last small window of time during which these kinds of plans will even seem possible: Fossil fuel projects will soon be taboo. The question is simply whether you want to listen to all the voices of reason now, or wait to hear the same message from your bottom line. By then, the worst harm may already be done.
Response: Comment acknowledged.	
Fitzgerald, John	I am a former railroad worker and union representative who worked this line as a Conductor and brakeman and who represented this territory as a United Transportation General Chairman. The rail line itself is not well maintained and needs an enormous amount of maintainence. The oil that would likely be shipped will come from either the Union Pacific Railroad (UP) or the Burlington Northern Santa Fe Railway (BNSF), more likely the BNSF. The BNSF oil comes from North Dakota and is very volitile and has been involved in serious derailments and explosions in the US and Canada. Forty some people lost their lives in Canada after a runaway, derailment and explosion.
Response: Comment acknowledged.	
Friesem, Judy	[Grays Harbor] is an estuary, critical habitat to a record number of migratory shorebirds.
Response: See Response to FL1-1.	
Gale, Maradel	The Department of Ecology has its neck on the line on this matter. There is no possible reason to allow oil terminals to be built in Grays Harbor. Your department has already shown unbelievable inability to understand environmental and ecosystem impacts by allowing spraying of the insecticide imidacloprid in Grays Harbor and Willapa Bay. Yes, I know that permit request was withdrawn, but not as a result of your department getting some good sense on the matter. Now comes this issue of oil terminals!
Response: Comment acknowledged.	
Gerl, Carol	We can not decrease carbon and greenhouse gas emissions by continuing to invest in the production and transport of fossil fuels. It's that simple.
Response: Comment acknowledged.	
Gohl, Joy	Leave big oil, small oil, all oil in the ground.
Response: Comment acknowledged.	
Groves, David	We need to keep our water clean especially for fishing and shellfish and shorebird habitat. I am a fisherman and need healthy salmon and trout habitat and for future generations. Damages in an accident last for decades.
Response: Comment acknowledged.	

Hall, David	President Obama nixed the Keystone pipeline because it flies in the face of all the current science on global heating. The fossil fuel plans for Grays Harbor are no different. They place profits ahead of human health and environmental sustainability. They must be stopped. Our grandchildren and their grandchildren need us now to preserve for them a livable future.
Response: Comment acknowledged.	
Hazen, Libby	As a grandmother very concerned about the role of fossil fuels in creating climate change and a homeowner who lives within the blast zone of oil by rail transport, I cannot remain silent!
Response: Comment acknowledged.	
Janzen, Gayle	The people of Washington State do not want to see our state turned into the dirty energy export hub of the United States. We want to take our state forward toward clean energy, so allowing more and more oil terminals to be built is the exact opposite direction we should be going in. We don't want to see more and more oil trains going through our neighborhoods carrying the extremely volitale Bakken crude. We don't want them clogging our traffic. We don't want to take a chance on spills from the increased shipping traffic in our fraglie Salish Sea. Our beloved orcas are barely surviving as it is. An oil spill would probably doom them to extinction. These proposed oil terminals benefit only the dirty energy CEOs who are already rich beyond our imaginations. Please do the right thing and say no to these terminals and yes to our future as the alternative energy hub of the United States.
Response: Comment acknowledged.	
Johnson, Calvin	The increase rail traffic is a serious concern due to noise, air pollution and traffic congestion.gr
Response: Comment acknowledged.	
Kelley, Linda	We must insist on making the switch to renewable energy from fossil fuels. It's a challenging transition but not doing so is absolute suicide, and that is no exaggeration, we need to wake up and make it happen.
Response: Comment acknowledged.	
Kelly, Kathy	This is too dangerous a risk for people who have little power to set safety standards, and who benefit little if at all from the oil.
Response: Comment acknowledged.	
Kersting, John	As a Parent, Educated Environmentalist Family Member, Journalist, Teacher and Community Leader as President of the Olympia Fraternal Organization of Eagles with over 450 members, I have been working with many others on environmental issues for over 40 years while we have been promised by our government and Oil Companies they would stop the reckless drilling and use of fossil fuels. We are furious at your collusion with corporate bullying in the name of profits for those who deserve none for poisoning our seas, air, food and lands. Selling cheap oil extracted with great damage to our lands to a Communist nation oppressing its workers, leading to documented catastrophic pollution problems while eliminating millions of domestic jobs is the most cynical and criminal act I have ever heard. Avoiding the switch to alternative fuels that have no impact on our health while supporting documented high impact fracking and drilling in critical habitats causing earthquakes, leaks of all types, horrid waste products buried or spilled out on our earth is reckless and absurd. While you pitch brother against brother with "Jobs" while risking the crown jewels of numerous states, including the coastal region of the Pacific Northwest I see nothing less than treason. Numerous tribes also recognize the catastrophic threat this shipping proposal offers with nothing in return with huge risks to their heritage and livelihood to lose. You must do all in your power to follow your primary mandate to protect us, not the profits of corporate criminals, no matter if they have had laws passed to provide cover for their immoral acts. I know you have the mandate to protect us and you must.
Response: Comment acknowledged.	
Kinzer, Paula	There are better way to meet our energy needs. I have solar panels, I support renewable energy via my power bill and an energy efficient home; I know sustainable solutions work.
Response: Comment acknowledged.	
Korn, Meryle	The Pacific Northwest is coveted by the huge fossil fuel companies as a launching point for sending gas, coal, and oil overseas. Instead of turning their R&D efforts toward carbon-free or carbon-mitigated energy sources, they seem determined to drain the last drop or lump of fossil fuels from the earth to be burned for their profits only - the environment be damned. We cannot allow them to put our state and our world at risk!

Response: Comment acknowledged.	
Laclergue, Ed	Hopefully you will make a ruling favorable to those of us who want to protect the environment by closing deliberation on these proposed debacles and denying any further consideration of these oil ports on/in Gray's Harbor.
Response: Comment acknowledged.	
Laing, Lesley	While I am an Oregon resident, my grandparents lived and worked in Hoquiam for most of the years I remember them. And my sister and her husband live in the region and both work in Aberdeen. This area and its health are important - and important to me.
Response: Comment acknowledged.	
Lish, Jeannine	Removing crude oil from the ground is just plain crude and cruddy! How crass can oil-diggers be who are sticking their heads in the sand instead of seeing what contamination has been and could continue to be in wrecking our world?! Father Time and Mother Earth put the elements in the ground, & our heavenly Father directed us to take good care of our earth. So, as we tell dogs, “leave it”!
Response: Comment acknowledged.	
Littlewood, Ann	I live in Portland and those oil trains come through our town and through the Columbia Gorge Scenic Area. So this issue is my issue as well as yours. It is a classic case of public risk for private profit.
Response: Comment acknowledged.	
Lloyd, Darvel	You must not approve any oil terminal for the Grays Harbor area--if only for the obvious reason: the looming threat of a giant subduction earthquake, which would be totally devastating.
Response: Comment acknowledged.	
Mackey, Sally	Climate change/global warming is becoming all too real. We must make the change to clean energy. It's economically viable, defeating the argument of job loss.
Response: Comment acknowledged.	
Mallard, Tom	This area and the plans for installation seem ignorant of tsunami risk for the Pacific Northwest from Point Mendocino, CA, north to Vancouver, BC. With the recent M9 in 2011 with tens of M7+ after puts tension on the Pacific Plate on this end in "so many years", clock is ticking and sea-level is rising that does put more stress on the continental margins. So from Kesennuma, Japan, a steep-walled inner waterway full of buildings for their largest port all wiped out in two-hours and then later that night caught fire. That killed many people that survived the tsunami. The fires spread quickly on water from all gas, oil, kerosene tanks were torn & floated then emptied in millions of gallons. It destroyed 1/3 of their factories and port-oriented infrastructure for the best prepared & educated culture on tsunamis. There can be no tankage for any fuels anywhere in this entire zone, the risk is too high and geophysical, tectonic conditions are set to release not a smooth continuation of the past that's over, that tension "wave" of stress is on the way my take 3-5 years to where the rate of stress buildup slows. Most would assume that's good it's really bad, it changes the angle of stress like changing the edge angle on skis, why you kick into a slippery hill to gain a grip, tension loses grip. This is a coast-wise Cascadian Fault situation well known for years and towns aware of except to move the tankage out of the tsunami zone. On a recent trip to Hood Canal, take a look at Seattle's waterfront with Harbor Island full of tanks ready to go like fireworks and the debris field wipes out most of the industrial district, zero infrastructure left just like Kesennuma, this from Tacoma to the Inland Passage. There is no place for the water to go, the Straits of Juan de Fuca fill for about 3-hrs, Kesennuma had 7 tsunamis from the aftershocks, areas in Sundai 50ft above sea-level got 30ft of debris fields and water. Consider the risks have seriously gone up tectonically to ignore them on the coastal issue.
Response: Refer to Draft EIS Section 3.1, *Earth,* for potential impacts of the proposed action. Also refer to the Master Response for Seismic Risk and Design Requirements.	
Martin, Arnold	Quoting from the Vancouver Hearing Examiner?s decision of 6 Oct 2015 on the Proposed NuStar project, page 26 of 31 WAC 197-11-794, Significant (1) "Significant" as used in SEPA means a reasonable likelihood of more than a moderate adverse impact on environmental quality. (2) Significance involves context and intensity (WAC 197-11-330) and does not lend itself to a formula or quantifiable test. The context may vary with the physical setting. Intensity depends on the magnitude and duration of an impact. The severity of an impact should be weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred. (3) WAC 197-11-330 specifies a

	process, including criteria and procedures, for determining whether a proposal is likely to have a significant adverse environmental impact. End of quote. Mr. Shay, there are many statements of significance in these DEIS documents. Exercise your authority under this legal interpretation, and deny all permits for these projects.
Response: Comment acknowledged.	
McConnell, Kelly	We cannot continue allowing these greedy rich assholes to pollute our land, air and water.
Response: Comment acknowledged.	
McMichael, Barbara	My family and I live in the Puget Sound area and visit Grays Harbor and the ocean beaches specifically to enjoy their wildlife and natural beauty. I support protection of Grays Harbor, its people, and its vital importance as part of the Pacific Flyway, and for that reason I urge you to reject the proposed Westway and Imperium oil terminals. It is a shortsighted way to meet today's energy and employment needs.
Response: See Response to FL1-1.	
McMurray, Gregory	Finally, as an oceanographer with 40 years' field experience from Monterey Bay to Bristol Bay, I am adamant that the United States not provide infrastructure for the Canadian tar sands to be exploited. Our oceans are already reacting to carbon dioxide and heat loading. Oyster hatcheries have failed already in Oregon and Washington. Please, leave it in the ground.
Response: Comment acknowledged.	
Meijer, Kristin	Why not leave fossil fuels in the ground as The Guardian newspaper has suggested for later years? We should grow more green jobs as I and nearly three hundred other people got Energy Management degrees to help people knock down their energy bills. The citizens of Puget Sound and other communities have not requested our expertize, so that many of us change jobs or work in other fields instead of making houses more comfortable while still having heat or the air conditioning, that more people needed this last summer. There are programs to help low income people to get Energy audits on their homes, to then save money on energy bills. Thank you for listening!
Response: Comment acknowledged.	
Milne, Candace	Many jobs here depend on our clean water and healthy environment.
Response: Comment acknowledged.	
Molloy, Johanna & Bill	We live one block from the ocean, next to the underwater museum, Brackets' Seaside Park, The Kingston Ferry and the beauty which we call Edmonds, WA. That means we live one block from the trains as well, since they go right by these sensitive areas multiple times a day. Our condo shakes like a 7+ earthquake every time the oil trains go by. There are so many negative factors that these trains have in our area. I know you know the information below, however, I just wanted to include from a personal view (shared by more voices than you can imagine), that the train situation is completely unacceptable. My husband and I are Realtors and are keenly aware of how these trains are negatively affecting values in our area. The trains are also killing sea life, leaving potentially carcinogenic residue to our neighborhood (and condo), are especially affecting the properties on bluffs, many with views and more. The weight of these trains is causing landslides, creating problems for the property owners, the running of the trains and unfairly requiring tax dollars going towards cleaning up the tracks, so that all the trains can run. Please study the negative effects of the trains on the communities that prize themselves on their seaside value, investments, popularity and commerce.
Response: Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Final EIS Chapter 5 further describes the potential risks associated with rail and vessel transport in this area.	
Newell, Sally	Our farm is within one mile as the crow flies from the Columbia River. It is 40 acres inside the Columbia River National Scenic Area, and it is our one, big asset. We are retired, but still farm actively. It is located in Underwood, a rural community with quickly escalating property values and a small, volunteer fire departments. Railroad-caused fires are a fact of life here, almost an annual event. The notion of these rails carrying that volatile Bakken crude past our farm worries us on many levels: evacuating our livestock (horses and sheep), our home and the loss of the considerable timber on the place would all be tough to take. To lose our life's work for the sake of shipping

	American oil from our beautiful Washington coast is simply too high a price to pay for no noticeable benefit to us or our community. Several Gorge communities have already announced their opposition to these shipments because their emergency services could not cope with an accident. All of these communities have much more robust emergency services than Underwood.
Response: Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.	
Ross, Elizabeth	Until the hearings I was only concerned about Grays Harbor, but I now realize the entire route here is at great risk, for profit of a few. Do you understand your complicity in the lives and property if that inevitable derailment and explosion happens enroute to Grays Harbor, just for a very few jobs? It's not worth it! We could invest in wind energy off our coast with greater value and so much safer. Please, it's our home. The home of all of us, the Earth.
Response: Comment acknowledged.	
Sigler, Dean	To move volatile Bakken Field oil through some of the most tinder-dry forests in the country is unintelligent at best - criminal at worst. This is a terrible idea given the safety record for these trains. To allow foreign-owned companies to put our people at risk for their mostly untaxed profit is political gullibility exploited.
Response: Comment acknowledged.	
Singer, Victoria	Why don't we just leave that stuff in the ground, where it can't hurt anyone (and may protect us against earthquake damage)?
Response: Comment acknowledged.	
Stapp-Brigham, Sally & Dick	Oil companies are trying to expand their Northwest operations, putting our communities at risk from explosive oil train derailments, huge increases in rail traffic, and oil spills from trains, tankers, and barges. And with each additional project, they add to the problem of carbon pollution and climate disruption. This is not the future we want.
Response: Comment acknowledged.	
Steitz, Jim	As a former resident of the Pacific Northwest, who retains great affection for my original home, I urge you to reject the proposal of Westway Terminal Company and Imperium Terminal Services to ship crude oil through Grays Harbor. The volume of oil to be handled by such terminals would constitute an unmitigated ecological disaster, in violent opposition to the state's objective of reducing carbon dioxide emissions. The Washington State government has expressed an overall goal of moving toward a lower-carbon economy, and to avoid the worst impacts of global warming. If these goals are to have any meaningful policy expression within the agencies, tasked with carrying out a governor's policy, then the Department of Ecology cannot issue this permit. This oil export terminal would be linked by rail, and in turn link ravenous, inefficient economies overseas, to some of the largest carbon bombs in North America, namely the Canadian tar sands and the Bakken oil shales of the Dakotas. Human survival demands that this grave liability to our atmosphere remain securely underground. The Westway and Imperium terminals, and other proposals for fossil fuel infrastructure along the Pacific Northwest coast, would be especially and painfully ironic for a state that has otherwise made admirable and meritorious progress in shifting to clean energy and ecological sustainability more broadly. I can scarcely fathom the horrific reversal of ecological paradigm that The Westway and Imperium terminals would constitute for Washington State, whose role in the global energy infrastructure would invert from a leader in the low-carbon transition, to a conduit of death for the highest-carbon fuels on Earth. The State of Washington has already committed itself to regional greenhouse gas reduction initiatives, and even though the initiatives are not yet self-enforcing, the Westway and Imperium terminals? Colossal volume of oil shale and tar sands would dwarf any carbon reductions attained in those frameworks. It therefore is a contrary and irreconcilable public policy to Washington's goals. Even before the climate impacts are considered, the immediate impacts to communities and landscapes between the oil sources and the departure point to the Pacific are numbing. The cities of Spokane and Grays Harbor would suffer an unacceptable diminution of their quality of life due to noise, air pollution, and the omnipresent eyesores of tankers and oil-loaded freight trains. Many other communities along the railroads further east would find additional hours of their day transformed into an acoustic and seismic barrage of rail traffic beyond anything they bargained for in joining that community. These oil-freighted trains have compiled a poor safety record in recent months. Their load of heavy crude is known to be even more explosive than lighter-grade oils, and human life is placed at unacceptable risk by running these loads on a recurring basis immediately adjacent to rail-line towns. Moreover, the risk of oil tanker spills in the precious waters of Grays Harbor and the Pacific Coast cannot be overstated. The coastline is a defining feature of both economic and aesthetic sustenance for Washington State, and no risk to its integrity should be contemplated. For all of these reasons, I urge

	you to immediately reject the Westway and Imperium terminals as contrary to the public interest of both Washington State and your fellow human beings around the world who depend upon a habitable climate. Thank you for your attention to this urgent issue.
Response: Comment acknowledged.	
Svensson, Shannon	Take a look at what is motivating you in your decision making practices. Be motivated by the sacredness of life Stop poisoning us, our planet and yourselves.
Response: Comment acknowledged.	
Tarico, Valerie	In my life I've visited perhaps a dozen communities that allowed one or another corporation to devastate their future and their ability to flourish economically. In Bali, it was a community in which a hotel chain built a hotel by cutting blocks of living coral -- destroying the reef that provided fish and tourism (and even killing the tourism to the hotel itself). In North Vietnam, it was a corporation that removed limestone karst formations in order to make cement. I'm sitting now in Lillooet, British Columbia, which was logged into oblivion in an effort to stave off the inevitable end of the timber mill--and now lacks the beauty that has attracted tech workers and prosperity to similar communities. Much of the income here now comes from traffic to the Stein area, which was protected after a fierce fight with loggers who wanted to eek the last few dollars out of a dying industry. Oil and gas are the past. They are not Washington's future, and by trying to eke out the last few dollars from a dying industry we risk that future.
Response: Comment acknowledged.	
Thayer, Marguerite	No to transfer facilities of oil in this environment. I remember Alaska, San Francisco Bay, and on and on. The cleanup of disasters is never finished. So let's not get started on the inevitable mistakes that will be made, attempts to hide them, deny them, and definitely not take responsibility for prevention, restitution for damages and cleanup.
Response: Comment acknowledged.	
Todd, Judy	In light of the Paris Agreements beginning tomorrow, and the continued deepening awareness and alarm over the relationship between global climate events, social and economic injustices, environmental degradation and the short leash of life as we know it comes to your door, it only makes sense to stop these efforts of frenzied extraction that sound the alarm of continued destruction of Earth's ability to sustain us. Stop the madness while you can still work for the future.
Response: Comment acknowledged.	
Tuepker, Anais	Given the substantial environmental risks posed by any crude oil-by-rail project, I ask you to reject the Westway an Imperium oil terminal proposals. Indigenous, business, and other local communities potentially impacted by these projects strongly oppose them. As a resident of the Pacific Northwest, I also do not want either the risks these projects would pose to our local ecosystems or the commitment to continued fossil-fuel expansion that they would signal.
Response: Comment acknowledged.	
Vaughn, Edward	The world is awash in oil. We don't need more. In fact, we need less. We need renewables. Keep this stuff away from Grays Harbor.
Response: Comment acknowledged.	
Wegener, Brian	Grays Harbor hosts a National Wildlife Refuge and a significant oyster industry.
Response: Comment acknowledged.	
Wells, Sherilyn	I am a former co-president of the Washington Environmental Council, but I am also the daughter of an oil company executive, ergo I have an intimate acquaintance with the industry. As an historical "insider," I stand with (support) the comments submitted by Tyson Johnson, Vice President Quinault Indian Nation, Pastor Kathryn Garnett, United Methodist Church of Hoquiam, Larry Thevik, Washington Dungeness Crab Fishermen's Association, and Crystal Dingler, Mayor of Ocean Shores. A temporarily prolonged investment in a dying industry (fossil fuels) is not how Washington should be preparing for its true, sustainable future - a future of alternative energy production which many other countries have already turned towards in vastly increasing numbers. For this temporary misdirection, which is a waste of effort and both human and natural resources, we would invite an unacceptable increase in threats to health, safety, and the environment which could last far longer than any perceived economic benefit (and that benefit would likely be realized only by a few people at the "top of the food chain" - members of the corporate Board). I see this proposal as a test of the behind-the-scenes influence wielded by petro-corporations within our political system versus whether there has been a sufficient increase in the numbers of people within government (both elected and hired) who are now recommitted to a government truly of, by, and for the people. No

	one who's been paying attention can conclude other than that that is an emphasis sadly lacking in recent decades.
Response: Comment acknowledged.	
Wichar, Den Mark	Communities like mine should not have to tolerate endless fossil fuel trains, going to wherever. Ports and terminals do not live in vacuums. What is decided for Grays Harbor affects everybody else. So listen to everybody else. Vancouver says no!
Response: Comment acknowledged.	
Wiley, Jana	I am against the transport of oil in Washington State on multiple levels. We need to address climate change now. Putting in this infrastructure will take us 180 degrees in the opposite direction. Emergency personnel cannot "fight" the fires that have been shown to be unfightable. Creating a safety plan for exploding trains in populated areas (other than putting up road blocks) will not save lives, property or waterways that are in harm's way. The visuals that we have all seen show that we do not have time to evacuate in the immediate blast zone...all that can be done is to stand back, watch it burn, and grieve. Emergency personnel will be impacted by these trains...this means that lives will be jeopardized as they sit by waiting for these trains to cross. Environmental damage from a spill would destroy all lifeforms involved. Is Grey's Harbor willing to risk its fishing business? We know how the tribes feel about the potential impact to their fishing rights. It is just too risky to engage in this dirty business. Just say no. Clearly, this must be a resounding NO! Over and over again, people meet and testify before decision makers. Never have you heard a majority in favor of doing this. ALWAYS it has been an overwhelming NO to this proposal, and for multitudes of reasons. It is time to really listen to the will of the people, and not those who stand to profit and just need a place to ship their environmentally destructive product off shore. When will the voices of the people be heard? How many meetings does it take? How many comment letters does it take?
Response: Comment acknowledged.	
Zeigler, Bob	I know you cannot make any permit decisions until all information is in and Impact Statements are final but I do hope you will explore all potential impacts especially secondary impacts of these proposed actions. SEPA Rules state: A proposal's effects include direct and indirect impacts caused by a proposal. Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as a precedent for future actions. For example, adoption of a zoning ordinance will encourage or tend to cause particular types of projects or extension of sewer lines would tend to encourage development in previously unsewered areas. (WAC 197-11-060, Content of environmental review (4) Impacts). The indirect or secondary potential impacts including increased risk of spill, accident and potential loss of life and public resources (water quality to fish and wildlife) to tribal resources occur from the point where trains are loaded with oil to the point of your permitted facilities. The fact that the previously developed site is enhanced for oil storage and transport sets in motion the movement of oil by rail from point of loading to the sites being proposed. In addition to increased spill or accident the impact of facilitating increased emission of CO2 from consumption of these resources has cumulative impacts on the climate of our planet. Scientists tell us that to reduce risk of most severe climate consequences we need to leave 80% of the planet's fossil fuels in the ground. Pope Francis in his recent encyclical, Laudato Si, calls on all on the planet to drastically reduce carbon emissions and convert from the use of fossil fuels. This has become a major moral issue as well as one of science. I also urge you to check with your legal staffs to assess, in light of railroads incurring no legal risks, what potential legal risks do the City and the state of Washington incur if one or both of these facilities are permitted and a train has a serious accident for example in Hoquium or even in City of Spokane or Tri Cities? While the railroad does not, both the City and the State have the responsibility for public health, safety and welfare and SEPA responsibility for a safe and healthy environment. Should an accident occur as happened in Quebec where 47 lives were lost, who pays especially when so many concerns have been raised in the environmental review and permitting process?
Response: Comment acknowledged.	

Table 7-7. Names Associated with CQRC Form Letter

A Piazzon, Gary	Abrams, Kathleen	Abreu, Sharon	Ackley, Blaine	Adams, Marsha	Adams, Marty
Alberts, Judith	Alderton, Janet	alexandra, k	Allen, Teresa	Alvarez, Vincent	Amato, Crystal
Anderson, Glen	Anderson, J	Anderson, Julie	anderson, seth	Angel, Carol	Angell, Kirsten

Anthes, Russell and Deborah	Antisdel, Jim	Antonini, Antonella	Ardner, John	Armstrong, Jude	Armstrong, Jude
asch, jeff	Askins, Susanna	Asmus, Sigrid	Aszman, Jan	Atkins, Owen	Attemann, Rein
Attemann, Rein	Attemann, Rein	Avinger, Linda	Avinger, Linda	B, Shary	Bachelder, Karen
Bachhuber, Stephen	Bahnsen, patrice	Baier, Kevin	Bailey, Ruby	Bailey, Ruby	Baker, Norman
Baker, Norman	Ballard, Tim	Baltin, Brian	Bancroft, Lois	Banks, Wesley	Bard, Eric
Barich, Cathy	Barnard, Terry	Barner, Wendy	barnes, Stan	Barrett, Karen	Barry-Simmons, Christina
Bartholet, Mary	Bartlett, Vivian	Barton-Gawryn, Mikaila	Baruch, Duncan	Basile, Tara	bauer, bruce
Bayer, John	Bayer, John	Beaman, Becky	Beasley, April	Beattie, Jane	beauclerk, carole
beauclerk, carole	beauclerk, carole	beauclerk, carole	beauclerk, carole	Beaven, Jane	Beckley, Diane
Beckley, Diane	Beckley, Diane	Beckley, Diane	Beebe, Dana	Beilstein, Mike	Belknap, William
Bell, Jonathan	Bengtsson, Barbara	Benkert, Kate	Berenson MD, Les	Berg, Ericka	Berg, Samuel
Berlly, Bella	Berlly, Michael	bernard, james	Berolzheimer, Jean	Berres, Michael	Bess, Karen and Ben
Bevacqua, Jennifer	Bhakti, Sara	Biale, Cheryl	Bickerton, Connie	Birkmeyer, Art	Black, Karl
Blackburn, Cathleen	Bleckinger, Dana	Block, Leland	Bloyer, Robert	Blue, Linda	Blue, Linda
Blue, Linda	Blue, Linda	Boatsman, Carolyn	Bobrick, Melantha	Bobrick, Melantha	Bobrick, Melantha
Bobrick, Melantha	Bobrick, Melantha	Bock, Chris	Bock, Chris	Bodman, Sharon	Bonney, Patty
Boom, Diana & Darryl	Boone, Carolyn	Boothby, Judith	Boswell, Debra	Boudreau, Carol	Bowman, Sandra
Boyce, Susan	Boyd, Marilyn	Brakke, Laura	Brando, Marge	Brandt, Robert	Braun, Joye
breier, rene	Briggs, Robin	brighton, lu	Brinkley, John	Brinkley, John	Brockway, Dorothy
Brooks, Deborah	Brooks, Janice	Brooks, Kerry	Brown, Peggy J.	Brown, Robert	Brown, Robert
Brown, Sandy	Brown, Sheila	Brunton, Beth	Bryan, MK	Bryant, Anita	Buch, Anthony
Bundy, Shannon	Burke, Jack	Burke, Kathleen	Burris, Bruce	Burris, Nannette	Busch, Jeff
Butler, ElsaMarie	Butters, Leonard	Caliandro, Peter	Caliandro, Peter	Calvert, Jennifer	Calvert, Jennifer
Cameron, Liz	Campbell, Fred	Campbell, Terran	Canon, Eric	Cantrell, Wm	Carey, William
Carlisle, Betty	Carlson, Ingrid	Carmona, Jay	Carney, Renee	Carr, Mary	Carroll, Felicia
Carroll, Niall	Casebier, William Mark	Casebier, William Mark	Casebier, William Mark	Chadd, Edward	Chadwick, John
Chadwick, John	Chadwick, John	Chapin, Heather	Chapin, Heather	chess, fritz	Chester, Paula
Chieco, Eileen	Childs, J	Christo, Charlotte	Ciancibelli, Allison	Cioffi, Sandy	Citizen, American
Citizen, American	Clark, Christine	Clay, Kylie	Clifton, Kimberly	Cochran, Hugh	Cochrane, Julia
Cochrane, Julia	Cochrane, Julia	Cochrane, Julia	Cochrane, Julia	Cochrane, Julia	cohen, judith
cohen, judith	cohen, judith	Colangelo, Annapoorne	Colangelo, Annapoorne	Coleman, Lissa	Coleman, Lissa
Colley, Edward	Collmer, Sarah	Colony, Stephanie	Colson, Lynn	Comouche, Joe	Conlan, Mike
Connor, Robert	Constans, Mary Ann	cooper, trina	cooper, trina	Corbett, Todd	Cordero, David and Ann
Cordero, David and Ann	Cortese, Diane	covault, jonnel	Cowan, Keith	Cox, Margaret	Cox-Carothers, Ruthanne
Craighead, Tom	Crawford, Kellie	Crawford, Scott	Crones, Creg	Cumming, David	Cummings, George
Cunningham, Colleen	Curry, Donna	Curry, Linda	Curry, Tierra	Curry, Tierra	Curtis, Helen
Curtis-Murphy, Megan	Curtright, Shari	Curtright, Shari	CURZIE, Bill	Cushwa, Nancy	Dahlgren, PhD, Mr. Shelley
Daloz, Larry	Dalton, David	Danehy deHart, Lyssa	Daniels, Chris	Darden, Ruth	Davidson, Susan
Davis, James	Davis, Jean	Davis, Judy	Davis, Lee	Dawson, Susan	de la Rosa, Marco
de Weille, Karin	Deal, Brandie	Dean, June	Dean, June	DeIvernois, Doug	deLancey, Kris
delles, susan	Dengler, Kurtis	Denning, Asphodel	Denning, Asphodel	Deora, Karen	Deruyter, Ineke
Desaulnier, Bonnie	Detering, Brandt	Devlin, Felicity	Diehl, D L Chris	Diehl, D L Chris	Diehl, D L Chris
Dispenza, Raymond	Dlugonski, Melba	Dobson, Kim	Dodds, Diana	Doherty, Janice	doherty, mike
Doherty, Sarah	Domke, Del E	Donaghue, Rosemary	Dorn-Coaton, Leah	Douglass, Tani	Dowson, Eleanor
Dowson, Eleanor	Dowson, Eleanor	Drake, Barb	Drake, Barb	Dreier, Ted	Druffel, Pauline
Druffel, Pauline	Duhaime, Edward	Dunkak, Dave	Dunn, Joyce	Dunn, Kara	Durnell, Tim
Eager, Walt	Earle, Ben	Eaton, Ondine	Eddington, Charles	Eddy, Mike	eggleston, robert
Eichelberger, Stephen	Eidem, CK	Elkins, Anne	Elliott, Jan	Elliott, Jan	Elliott, Jan
Elliott, Jan	Else, Carol	Elwell, Homer	Ely, Don	Emanuel, Peggy	Engler, Pamela
English, Bashie	Ennis, Rosie	Ennis, Rosie	Ensign, Dianne	Epstein, Heidi	Erfurth, Elizabeth
Eubanks, Arlene	Ewald, Mary	Faithfull, Lucia	Faithfull, Lucia	Fancher, Shawna	Fanning, Donna

Farison, William	Fasnacht, Sharon	Fechner, Joann	Felber, Michael	feldman, virginia	Felton, George
Ferorelli, Josephine	Fetz, Ethan	Fickeisen, Kurt	FIFE, KEVIN	fifelski, karen	FINLEY, ANDREA
Finley, Christopher	Fitch, Geoff	Fitzgerald, John	Fleming, Katie	Flores, Lupito	Follett, Thelma
Foutch, Madeleine	Franchini, Stephen	Fredrich, Victoria	Fredrich, Victoria	Fredrich, Victoria	Frei, Kathleen
French, James	Friedman, Andrew	friedrick, stephen	Friesem, Judy	Fuller, Marilyn	Fulton, JR
G, Dorothy	Gaanner, Ray	Gadea, Francisco	Gagnon, Connie	Gagnon, Connie	Gale, Kate
Gale, Maradel	Galushko, Sergey	Gardener Milne, Lorree	Garmon, Jenna	Garmon, Toni	garvey, lydia
garvey, lydia	Gary, Michael	Gaspar, Liz	gates, patty	Gerl, Carol	Gervais, Anthony
Gibbs, jeanne	Gibbs, jeanne	Gibbs, jeanne	Gibbs, jeanne	Gibbs, June	Gibbs, June
Gibbs, June	Giesen, Tom	Gilardi, Gary	Gilliis, Edith	Gillis, Marian	Gilman, Christina
Gilman, monica	Ginsberg, David	Ginsberg, David	Gipe, Robert	Glasgow, Dale, also Ina	Glass, Richard
Gleason, David	Glidden, Hal	Glidden, Hal	Glover, Julia	Godfrey, John	Gohl, Joy
Goldman, Debra	Goldwater, Glenda	Goodnough, Jenny	Goodwin, Amanda	gordon, jan	Grace, Lise
Grad, Brian	Graham, Charlie	Graham, Lynn	Grant, Jonathan	Graves, Michele	Grebanier, Marian
Green, Joel	Gregory, Barbara	grenfell, patricia	Grey, Sylvan	Grieb, Paula	Grimm, Gloria
Grimm, Jere	Grobelny, Julie	Guidry, Jean	Gustafson, Jeff	Guy, Julianna	Guy, Julianna
Hackney, Nancy	Haga, Martha	Haggin, Bart	Hake, Buffy	haley-strand, linda	Hall, David
Hallman, Holly	Halpern, David	Hamilton, Adama	Handbury, Genevieve	Hansen, Christopher	HANSEN, PAUL
Hansen, Ron	Harbison, Cynthia	Hardcastle, Alan	Hargrave, Theresa	Harris, Bill	Harris, Bill
Harris, Holly	Harrison, Randy	hartung, zena	Havens, Lorena	Hawley, Daniel	Hays, Helen
Hays, Helen	Hazen, Libby	Heath, Diane	Heinemann, Karen	Hennon, Mark	Hermanns, David
Heron, Carrie	Heroux, Erick	Hesterberg, Tim	Heverly, Craig	Heywood, Susan	Heywood, Susan
Higgins, Hollis	Hill, Megan	Hill, Megan	Hill, Megan	Hill, Megan	Hill, Megan
Hill, Sandra	Hiltner, Carol	Hirsch, Robin	Hirst, Eric	Ho, Shane	Hodgin, Richard
Hodgin, Richard	Hoerner, Dennis	Hoffman, Marianne	Hogan, Nancy A.	Holcomb, Peter	Holm, Patricia
Holtz, Eric	Holz, Thomas	Hoover, Karen	Hopkins, Tom	Horman, Blythe	Horter, P
Hosford, Terry	Houck, Lou Anne	Howard, Celeste M	Howe, Jared	Howe, Jared	Huang, Grace
Hubbard, Shaun	Hudson, Dot	Hudson, Drew	Hughes, Laurel	Hughes, Laurel	Hughes, Lori
Hughes, Michael	Hulick, Stephen and Kathleen	Hull, B.S. Biology, Danny	Hull, Carrol	Humphrey, Jay	Hunter, Rhonda
Hunting, Duane	Indrick, Doug	Irwin, Ursula	Irwin, Ursula	Irwin, Ursula	Irwin, Ursula
isaac, carol	isaac, carol	Jablon, Danya	Jackson, Jeff	Jacobsen, Michelle	Jacobson, Addie
Jacobson, Addie	Jacobson, Addie	Jacobson, Addie	Jacobson, Addie	Jacobson, Addie	Jacobson, Addie
Jacobson, Addie	Jacobson, Addie	Jacobson, Addie	Jamerson, Natalie	Jamerson, Natalie	Jamerson, Natalie
Jamerson, Natalie	Jamerson, Natalie	Jamerson, Natalie	Jamerson, Natalie	Janzen, Gayle	Jefferson, Lars
joel, Taryn	Johnson, Dr Burton & Doris	Johnson, Dr Burton & Doris	Johnson, Mary Lou	Johnson, Mary Lou	Johnson, Richard
Johnston, David	Johnston, Lloyd	Johnston, Lloyd	Johnston, Robert	Jokela, Mary and Brian	Joldersma, Benjamin
Jones, Judith M.	Joos, Sandra	Joos, Sandra	Jordan, Dorothy	Jordan, Elinor	Juhl, Brandon
Juran, Cristina	Kaczmarczyk, Robert A.	Kahn, Aaron	Kane, Alexis	Kaplan, Robert B.	kappler, dorian
Kardas-Nelson, Mara	Kauffman, Lisa	Keefe, George	Keegan, William	Keeley, James	Keith Brown, Teresa Robbins &
Kelley, Linda	Kelly, Kathy	Kelsay, Kathleen	Kemper, Kathleen	kennedy, john	Kennedy, Sharon
Kersting, John	Kessinger, Jerry	Ketter, David	Key, Christopher	Key, Christopher	Keys, Alicia
Kickbusch, Sandra	King, Dave	King, Sara	King, Susan	Kinzer, Paula	Kircher, Marjorie
Kirsch, Alison	Kirsling, Mary-Ann	Kiser, Gayle and Larry	Kittredge, Kit	Kittredge, Kit	Klopp, Basey
klump, sandra	Knapp, Kristan	Knopp, Jason	Knutson, Dana	Koehler, Fran	Koehn, Zach
Kogut, Merry	Kohjima, Ellen	Kohl, Steve and Sybil	Koller, Monique	Koons, Christina	Korn, Meryle A.
Korn, Meryle A.	Korn, Meryle A.	Kovarik, Kerry	Kozlowski, Ted	KRAFT, DONNA	Kralik, Christopher
Kralik, Christopher	Kralovec, Margaret	Kronenberg, Esther	laclergue, ed	laclergue, ed	LaCroix, Steve
Laing, Lesley	Laird, Ashley	Lamb, Barbara	Lancaster, Matt	Landess, Stephen	langhans, judith
Larco, Dorothy	Larsen, Jennifer	Larson, Elizabeth Rae	LaRue, Erik	Laurenzi, Adrian	Lavalle, Gabriel
LaVonne, Nadine	Lawrence, Lynn	Laws, David	Lazar, Alexander	Ledl, Barbara	lee, constance
Lee, Derek	Leeds, Frank	Lee-Engel, Christy	Leeper, Kimberly	Lenihan, C	LeVan, Eileen
LeVan, Eileen	Lienhard, Judith	Lileet-Foley, Rachel	Lill, Nancy Enz	Lindholdt, Paul	Linn, Lety

Linn, Lety	Linn, Lety	Lish, Jeannine	Littlefield, Jim	Littlefield, Jim	Littlewood, Ann
Llewellyn, Mary	Llewellyn, Mary	Lloyd, Darvel	Loftness, Kim	Long, Audrey	Long, Greg
Loranger, John	Loranger, John	Loranger, John	Loranger, John	Loranger, John	lou, ray
Low, Sammy	Low, Sammy	Lowe, Robyn	Luchessa, Scott	Luck, Diane	Luk, Andrew J.
Lund, Sally	Lyman, Teresa	Lynn, William	Lyons, Mary	MacDougall, Michael	Mackey, Sally
Mackin, Rich	MacKinnon, Melanie	Madrone, Calli	Magana, Mariateresa	makela, christine	Maki, Linda
Mallard, Tom	Mallery, Fred	Malmquist, Virginia	Mamoyac, Joy	mantz, riane	Marceron, Dennis
Marceron, Dennis	Marceron, Dennis	March, Roland	Marlow, Renetta	Marriott, Lee	Martin, Arnold
Martynowych, Denis	Marx, Janet	Massey ND, Jim	Massey, Linda	Mather, Nic	Matthay, Anita
Maust, L	Mayo-Velasco, Judy	McAninch, Edward	McBride, Dorothy	McChesney, Evelyn	McClay, Mauria
McConnell, Kelly	McCuen, Annie Francoise	McCuen, Annie Francoise	McCuen, Annie Francoise	McCuen, Annie Francoise	mccune, Marla
Mcdonald, Julia	McFarlane, Brent	McGee, Patricia	McGowan, Wendy	McGowan, Wendy	McGrady, Cynthia
McKibben, Craig	McLachlan, Pat	McLaughlin, Sarah	McLean, Roger	McMahon, Nancy	McMichael, Barbara
McMillan, Wendy	McMurray, Gregory	meacham, pat	Medford, David	Medford, David	Meijer, Kristin
Melcher, Pamela	Menke, Christine	Mergler, Gerald	Mergler, Gerald	Merritt, Regna	Merritt, Regna
Meyer, Emily	Michaels, Brenda	Michaels, Brenda	Michaels, Brenda	Michaels, Brenda	Michaels, Brenda
Micheli, Carmela	Miknaitis, Gajus	Mildrew, Melanie	Miller, Travis	Miller, Travis	Mills, Toni
Milne, Candace	Mlekarov, Noemia	Moline, Steven	Moline, Steven	Molloy, Johanna and Bill	Monahan, Amy
Monahan, Gregory	Monge-Eaton, Cynthia	Moore, Colleen	moore, edward	Moore, Ron & Marci	Moore, Ron & Marci
Morabito, Joan	Morabito, Joan	Morgan, Justin	Morgan, Kristy	morris, Arvia	Morris, R.
Morse, Amanda	Morse, Tyler	Mosac-Clark, Vivianne	Moser, Debra	Most, Charlie	Mower, Amy
MUELLER, GREG	Mueller, Teresa	Mulcare, James	Mulcare, James	Murphy, James	Murphy, James
Murphy, James	Murphy, James	Murphy, James	Murphy, James	Nagel, L.	Nagel, L.
Nakata, Kristi	Nakata, Kristi	Nakata, Kristi	Nakata, Kristi	Nam, Hyung	Nelson, Alice
nelson, Katherine	Nelson, Kay	Nelson, Lin	Nelson, Marianne	Nerin, William	Nerwick, Randall
Nettleton, John	Newcombe, Patrick	newell, sally	Nichols, David S.	Nichols, Kate	Nickerson, Donna
Novelli, Rebecca	Nuccio, Theresa	Oborn, Roger	O'Brien, Daniel	O'Brien, William	O'Brien, William
Ohanian, Laura M.	Ohanian, Laura M.	O'Hanley, Kelly	O'Neal, Maureen	Onsel, Greg	Orlinski, Patricia
Orsi, Catherine	O'Steen, Barbara	Ouellette, Ty	Oulman, Lynne	Oulman, Lynne	Oyler, Jim
Paetsch, Chandra	Palmer, Libby	Palumbo, Julieann	Panfilio, Carol	Pardi, Marco	Parks, littlebird
Parsley, Adina	Parsley, Adina	Pasichnyk, Richard	Pasik, Luanne	Pasillas, Christina	patano, terry
Patch, Rashid	Patterson, Eugenia A.	Pearsall, Iris	Peck, Joyce	Pederson, Gary T	Penn, Janie
Penry, Marlene	Penry, Marlene	Perk, David	Perkins, Sherry	Peterson, Carol	Peterson, Kathe
Pfeiffer, Benjamin	Pfeiler, Nancy	Phare, Darrell	Philipsborn, Jan	Phillips, Glenn	Phyliky Rimes, Carrie
Pickering, Karen	Pickering, Karen	Pickles, Tomm	Pierson, Gary	Pietrowski-Ciullo, Evelyn	piper, janna
Pistrang, Temma	Pistrang, Temma	Ploger, James	Poirier, Jeanne	Polk, Nora	Polk, Nora
Popejoy, Evelyn	Popejoy, Evelyn	Popejoy, Evelyn	Popejoy, Evelyn	Popejoy, Evelyn	Porter, Maria
poscharscky, debra	Potter, Antonia	Primrose, John	Primrose, William	Provost, Lin	Putnam, Alethea
Putnam, Alethea	Putnam, Alethea	Putnam, Alethea	Putnam, Alethea	Quinonez, Jesus	rabin, Johanna
rae, melody	Rainey, Dorli	Ramel, Alex	Ramon, Laura	Ranta, Robert	Rasmussen, Pat
Rathbun, Patricia	rauch, marian	Raymond, Dennis	Rayner Fried, Kate	Reading, Toniann	Reed, Ronald
Rehn, Debra	Rehn, Debra	Reidy, Thomas	Remmerde, Julie	Revord, Julie	Reynolds, Michael
Richards, Patricia	Riley, Mary	Rimbos, Peter	Rimbos, Peter	Rivendell, Laura	Rivera, Maggie
Rivera, Maggie	Rivera, Maggie	Rivera, Maggie	Rivers, Jerry	Rizer, William	Roberts, Justin
Robins, Berklee	robinson, d	Robinson, Joelle	Robinson, Joelle	Robinson, Joelle	Robinson, Joelle
Robinson, Kathryn	Rocks, Brent	Rocks, Brent	Rohrer, Bonnie	Roland, Lorinda	Rollow, Nina
Romer, Leslie	Rosemeyer, Jere	Rosenberry, Rick	Rosenkotter, Barbara	Rosenkotter, Barbara	Rosenkotter, Barbara
Ross, E	Rossi, Linda	Rowan, Shannon	rowland, evelyn	Rowlands, Alan	Ruggles, Derya
Ruksza-Lenz, Arlene	Rumiantseva, Elena	Rumsey, Casey	Russo, Jay	Russo, Jay	Russo, Jay
Russo, Jay	Russo, Jay	Russo, Jay	Russo, Jay	Russo, Jay	Ruud, Dave
Sacha, Diana	Sakamoto, Patst	Salter, Sarah	Salter, Sarah	Samstag, Randal	Samstag, Randal
Samstag, Randal	Samstag, Randal	Samstag, Randal	Samstag, Randal	Samstag, Randal	Samstag, Randal
Samstag, Randal	Samstag, Randal	Samstag, Randal	Samstag, Randal	Samstag, Randal	Samstag, Randal
Samstag, Randal	Samstag, Randal	Samstag, Randal	Samstag, Randal	sandgren, erik	Sands, Alison
Sanerib, Tanya	sauter, deborah	sauter, deborah	Scavezze, Barb	Scavezze, Barb	Schaefer, C. Thomas

Schaetzel-Hill, K Burnell	Schaub, David	Scheelen, Robert and Dolores	Scheelen, Robert and Dolores	Schiesl, David	Schmidt, Lee
Schmidt, Lee	schmidt, linda	schmidt, linda	schmidt, linda	schmidt, linda	Schmitt, Jaylen
Schmitt, Jaylen	Schnase, Thea	Schuldt, Gary	Schulte, Michael	Schumacher, Barbara	Schweinsberg, Peter
Scribner, Denee	Seaman, Carol	Seaman, Carol	Seaman, Carol	Seaman, Carol	Seaman, Carol
Seaman, Carol	Seaman, Carol	Seaman, Carol	Seaman, Carol	Seaman, Carol	Seaman, Carol
Seaman, Carol	Seaman, Carol	Seaman, Carol	Seaman, Carol	Seaman, Carol	Seaman, Carol
Seaman, Carol	Seaman, Carol	Seaman, Carol	See, William	See, William	See, William
Seibert, Jack	Sennesael, Menno	Settell, Mike	Sexton, Ken	Shadbolt, Candace	Shadforth, Sandy
Sharpe, Kathryn	Sharpe, Rosie	Sharples, Vivien	Shaw, Stuart R.	Shaw, Stuart R.	Sherdahl, Eric
Sherdahl, Eric	Sherer, Janice	Sherman, Mike and Kathy	Sherwood, Dan	Shimeall, Nancy	Shinn, Ava
Shira, Sondra	Shrock, Donna	shubert, stephen	Shurgot, Michael	Shuster, Todd	Shute, Brian
Sielaff, David	Sievertsen, Mary	Sigler, Dean	Silver, Ilene	Simmons, Andrea	simpson, penny
Singer, Victoria	Skenazy, Judith	Skydancer, Raven	Slater, Debra	Sleicher, Gretchen	Sloan, Catherine
Smason, Marc	Smason, Marc	Smith, Angela	Smith, Dennis	Smith, Diane	Smith, Diane
Smith, Joe	Smith, Lucy	Snow, Albert	Snow, Michael	Soliz, Jean	Sorg, Stacey
Soule, Ann	Spalding, Cathy	Spalding, VickiKay	Spike, Wilma	Spotz, Carl	Sprague, Jennifer
Spratt-Nuffer, Gayla	st clare, alannah	Stansbury, Katherine Anne	Stapp-Brigham, Sally & Dick	Stathatos, Michael	Staton, Janiece
Steadman, Jane	Steinhardt, Helene	Steitz, Jim	Stenger, Joseph	Stevenfeldt, Judy	Stewart, Diana
Stewart, Jan	Stewart, Lisa	Stiegman, Karol	Stiglich, Lynn	Story, Patrick	Strabel, Douglas
Streight, Chris	Stucker, Kara	Stull, Kevin	Sullivan, Diane	Sullivan, Sharon	Sullivan, Terry
Summers, Scott	Sundquist, Janet	Surmon, Angelita	svensson, shannon	Swartzman, Margaret T	Swiggett, Clifton
Swiggett, Nelda	Sword, Carol	Talbott, Ryan	Talcott, Diana	Tambellini, Mindi	Tan, Shirlee
Tapp, Jane	Tarico, Valerie	Tarpley, Polly	Tashjian, Randy	Tashjian, Randy	Taylor, Dora
TEMPLE-Thurston, BARBARA	Templeton, Jim	Tenney, Sean	Tennyson, Katharine	Terry, Rod & Linda	Tharp, Rod
Thayer, Marguerite	Thomas, Bob	Thompson, Stephen	Thompson, Sunny	Thoms, Robert	Thomsen, Don
Thorn, Debbie	Thorne, Eugene	Thouless, Margaret	Tillman, Heather	Todd, A.	Todd, Judy
Tolchin, Carole	Tolonen, Norman	Tomlinson, Barbara	Trail, Pepper	Truskoff, Lou & Joan	Truskoff, Lou & Joan
Tsongas, Theodora	Tuepker, Anais	Tufnell, Alexandra	TURKSEL, JUDY	turner, robert	Twain, J. Gregory
Urias, Victoria	Valencour, Sandy	Valencour, Sandy	Valencour, Thomas	Van Alyne, Emily	Van Alyne, Emily
Van Haalen, Teresa	Van Leekwijck, Natalie	Vandenbush, Shannon	Vaughn, Edward	Vegdahl, Rolf	Veith, Joachim
Vestal, Kathryn	Vilgalys, Justas	Vincent, Mary	Vining, Jennifer	Voinot-Baron, Margretta	Voinot-Baron, Margretta
Voinot-Baron, Margretta	Voinot-Baron, Margretta	Voinot-Baron, Margretta	Voinot-Baron, Margretta	Voinot-Baron, Margretta	Voinot-Baron, Margretta
Voinot-Baron, Margretta	von Hippel, Peter and Josephine	Wade, Sherry	Wagner, Jena	Wagner, Scott	Wainstein, Leonard
Wainstein, Leonard	Wakefield, Marie	Waldorf, Elizabeth	Walker, Susan	Wallace, Gordon	Walls, Julia
Wallway, Kristen	Ward, Gilbert	Warden, Patricia	Warren, Janette	Warren, Janette	Warren, Janette
Warren, Janette	Warren, Janette	Warren, Janette	Waterman, Amy	Watkins, Mr Erin	Way, Janet
Weage, Robin	Weatherford, Matt	weaver, Laird	Webb, Randall	Webb, Randall	Weber, Vivian
Webster, Theresa	Wechsler, Susan	Wechsler, Susan	Weddle, Sharon	Wedlund, Rose	Weed, Ardeth L.
Weed, Ardeth L.	Weed, Ardeth L.	Weed, Ardeth L.	Weed, Ardeth L.	Weed, Ardeth L.	Wegener, Brian
Wegener, Brian	Wegener, Brian	Wegener, Brian	Wegener, Brian	Wehrley, Donna	Weick, Lynette
Weilage, Krystal	Weir, Joyce	Weiss, Charlie	Wells, Sherilyn	West, Rusty & Candice	Westby, Julia
White, Jeffrey	White, Nancy	White, Valerie	White, Virginia	White, Virginia	White, Virginia
Whitson, Barbara	Wichar, Den Mark	Wickham, Brooke	Widmer, Jeff	Wiebenson, Sarah	Wiederhold, Joe
Wiegman, Rosemarie	Wilde, D'Arlyn	Wiley, Jana	Wiley, Jana	Wiley, Jana	Wilhelm, Georeg
Wilkinson, Charles	Wilks, Andrew	Williams, Barbsra	Williams, Beverly	Williams, Billie	Williams, Joseph and Diane
Williams, Joseph and Diane	Williams, Kyenne	Williams, Mitch	Williams, nancy	Williams, Richard	Williamson, Nancy
Wilson, Bea	Wilson, Bea	Wilson, Bea	Wilson, David	Wilson, Doris (Jody)	Wilson, Sharon
Wilson, Sharon	Winstanley, William	Wise, Carla	Wiseman, Pamela	Wolcott, John	Wolf, Esther
Wolf, Heidi	Wolf, Kris	Wolfe, Kathleen	Wood, Barbara L	Wood, Gordon	Wood, Gordon

Woodland, John	Workman Weaver, Nora	Wyatt, Kathryn	Wyman, Jean	Yake, Bill	Yergin, Sarah
Yorker, Dawn	Young, Mark	Young, Nancy L	Zeigler, Bob	Zembryki, Denise	Zhapbarbergenova, Guloim
Zibelli, Louis	Zimmerman, Lloyd	Zimmrtman, Linda	zucker, marguery lee	Zuckerman, Jan	Zurfluh, Paul

FL5 CREDO

Comment FL5-1

RE: Westway and Imperium oil projects in Grays Harbor.

"I urge you to do everything in your power to stop the dirty and dangerous Westway and Imperium oil projects in Grays Harbor. The DEIS finding for these projects show serious risks, impacts and potential environmental damage. Building more infrastructure for yesterday's dirty energy is the wrong path to meet today's energy needs and a big economic gamble. Washington state should continue to lead on safe, renewable clean energy solutions and say no to more oil and coal."

Sincerely,

Response to FL5-1

Refer to the Master Response for Purpose and Focus of the EIS.

Table 7-8. Unique Comments Associated with CREDO Form Letter

Commenter Name	Comment
A., Nando	the ignorance of men is the enemy of mama nature why is it that the most educated people commit and allow the worst crimes against nature and humanity? men has turn earth into a painful place for all living beings...when you do wrong nothing goes unpunished Stop the war against the environment by men I blame you for being cruel
Response: Comment acknowledged.	
Adams, Catherine	My state is worth more than the mess Shell leaves behind.
Response: Comment acknowledged.	
Autrey-Schell, Yovonne	As a resident of Grays Harbor County, I am vehemently opposed to allowing crude oil terminals in our port and crude oil trains on our railways. Our local economy is largely dependent upon tourism and aquaculture, both of which would be devastated by the inevitable oil spills. Grays Harbor County does not have the ability to deal with an oil spill, neither does Washington state, and the oil and rail companies refuse to put up a bond to fund the cleanup of a spill. On purely environmental concerns, oil spills will be devastating to critical habitat in Grays Harbor itself as well as to all of the local and migratory bird and animal species that it supports. Add all of the above to the devastatingly explosive nature of the crude oil that they want to ship on our railways and you should be capable of coming up with the right answer: NO OIL TRAINS!
Response: Comment acknowledged.	
Baker, J Weston	Please note: while the preceding comment was not directly written by me, I fully endorse each of its statements as they completely refect my own opinion in this matter."
Response: Comment acknowledged.	
Baker, Robert	Allowing for oil trains is the same as allowing for long-term destructive catastrophes-just not knowing when or where they will occur, but knowing that they WILL happen!
Response: Comment acknowledged.	

Betz-Zall, Rosy	People in our communities need to be protected from the spills that happen from the transport of oil. The new oil transport facilities will not add to the safety of Grays Harbor and are a temporary fix for the economy. There are better and more safe ways to build the economy.
Response: Comment acknowledged.	
Burden, Lyssie	My family and I urge YOU to do everything possible to stop the dangerous and toxic Westway and Imperium oil projects in Grays Harbor. The DEIS findings for these projects show serious risks, impacts and high potential of significant environmental damage. Building more infrastructure for yesterday's energy sources is the wrong path to meet today's and tomorrow's energy needs. This investment would be a huge economic gamble. Washington state should continue to lead on pioneering safe, renewable clean energy solutions for our energy needs. PLEASE say, No!" to more oil and coal polluting our already-stressed natural environments and already stretched public funds."
Response: Comment acknowledged.	
Canonica, C	We need less dirty oil and more renewable power and this benefits the 1% and puts the 99% at risk. Time to take care of the planet and the people not the rich and corporations.
Response: Comment acknowledged.	
Carey, Lynn Oha	Washington state NEEDS TO lead the nation in safe, renewable clean energy solutions and say NO MORE to more oil, coal, and the economic devastation of climate change.
Response: Comment acknowledged.	
Carlson, Joel	Global warming fossil fuels must stay in the ground so we don't destroy life on earth in our current sixth great mass extinction. Almost all life on earth disappeared in previous mass extinctions. We must very quickly switch to renewable energy including solar. Electric vehicles keep costing less while going farther on a charge so fossil fuel vehicles must be eliminated. Wood construction including large multi-story projects sequesters a lot of carbon. Many trees must be planted. Now is the time for action! See https://www.youtube.com/watch? v=sRGVTK-AAvw .
Response: Comment acknowledged.	
Chandler, Estelle	As a founding family member of historic Anacortes, the thought of having the pristine Puget Sound Eco system damaged by one of these toxic trains is terrifying!
Response: Comment acknowledged.	
Clarke, Antony	Please say No" to oil trains through the spectacular Columbia Gorge, a major national scenic area. An oil spill and fire in this forested natural wonder could destroy its beauty for generations. This would be a great loss to the nation, state and local residents who get nothing from this enterprise but are burdened with all the risks. Already over 50 trains a day intrude on this otherwise serene heroic county and adding more carrying fuel is unacceptable. "
Response: Comment acknowledged.	
Cloud, Tom	These trains are unsafe at any speed.
Response: Comment acknowledged.	
Comish, Thomas	I feel strongly about this issue and I will be watching your actions closely.
Response: Comment acknowledged.	
Cooley, Vera	I live less than a mile from BNSF tracks -- enough said!
Response: Comment acknowledged.	
Davis, James	These huge oil trains are already traveling through the middle of Wenatchee without any regard for disaster potential. We are just waiting for destruction of the town.
Response: Comment acknowledged.	
Delsena Barrett, Fiona	Please tell them NO. Or put real teeth in safety enforcement -- because large companies always shove safety to the bottom of the list -- at best.
Response: Comment acknowledged.	
Dessein, Mary	Washington state should continue to lead on safe, renewable clean energy solutions, such as Fusion, and say no to more oil and coal.
Response: Comment acknowledged.	
Dobson, Larry	Oil is on its way OUT. Don't support any expansion in delicate coastal Washington!
Response: Comment acknowledged.	

Donaldson, Susan K.	We do not need more dangerous oil trains; we need new thinking that puts people's needs and safety ahead of profits for corporations.
Response: Comment acknowledged.	
Duvall, Monique	This is an irresponsible project that completely ignores the safety of it's citizenry and the ecological health of Washington State. It's shameful capitalist exploitation at the risk of the collective good.
Response: Comment acknowledged.	
Ellison, Mike	As a Washington resident and an environmental scientist, I want to comment on the Westway and Imperium oil projects in Grays Harbor. I believe the negative impacts outweigh potential economic benefits.
Response: Comment acknowledged.	
Erlichman, Jon	Only terrorists and traitors do the bidding of authoritarian regimes. Their sole purpose is to undermine freedom. Do not become terrorists and traitors. Deny them their wish.
Response: Comment acknowledged.	
Farnsworth, Adrian	We live in the Pacific Northwest due in large part to its pristine beauty. I urge you to do everything in your power to stop the dirty and dangerous Westway and Imperium oil projects in Grays Harbor.
Response: Comment acknowledged.	
Fletcher, Pat L	PLEASE halt implementation of the dirty and dangerous Westway and Imperium oil projects in Grays Harbor. DEIS findings for these projects show serious risks, impacts and potential environmental damage. Building more infrastructure for yesterday's dirty energy is the wrong way to meet today's energy needs and a huge economic gamble. Gambling with my grandduaghters' future is hostile to our future! Washington state must continue to lead on safe, renewable clean energy solutions and say no to more oil and coal.
Response: Comment acknowledged.	
Franzmann, Paul K	With one error, you'll have a toxic mess on your hands that will despoil the region for decades, as did the Exxon Valdez spill.
Response: Comment acknowledged.	
Hadden, Cindy	Cuz Our Kids Get No
Response: Incomplete comment.	
Hanlon, Linda	Please do not confuse sustainable jobs with pollution and health tainted prospects attached to each train load of oil that some want to send your way. Willapa and Grays Harbor are national treasures. We have lost other viable, clean and productive bays for fish, whales and citizens dependent on truly sustainable water dependent jobs and lifestyles. I love your bay as much as you do, but trains and the fossil fuel industry do not belong there. Just say no thank you to proposals to locate and ship fossil fuel products from Grays Harbor.
Response: Comment acknowledged.	
Hastings, George	I have spent a great deal of time kayaking and canoeing in the Gray's Harbor and Chahalis River areas. The the place is to beautiful, important for nature, and fragile to take a chance with an industry whose history of disregarding people and the envirormnent for the sake of its bottom line is just plane wrong.
Response: Comment acknowledged.	
Holman, Victoria	We have suffered enough.
Response: Comment acknowledged.	
Horner, Sean	The DEIS findings for these projects show significant risks that should not be borne anywhere. Building more infrastructure for dirty energy intensifies the needlessly perilous path of climate change.
Response: Comment acknowledged.	
Humphrey, Linda L	Grays Harbor and Willapa Bay are some of the last clean salt water areas for shellfish that we have left, since areas of the Sound are so frequently shut down to harvesting from red tide and other increasingly frequent problems, many related to our ongoing pollution of this critical environment.
Response: Comment acknowledged.	
Ingalls, Evan	Investing in a future with coal, oil, or fossil fuels is the wrong direction for Washington State!

Response: Comment acknowledged.	
Jakabosky, Joel L.	I am a volunteer fireman on the High Prairie & Lyle Fire Departments in Klickitat County, WA. Our departments provide primary fire protection along 12 miles of railroad and mutual aid to other districts on a total of 85 miles of rail. There is no way we will be able to control an oil train fire resulting from a derailment and BNSF has stated it will take at least 4 hours for them to mobilize and fight the fire. Also, this crude oil, if lost into a river like the Columbia is known to move downstream over time destroying the entire river bottom ecosystem all the way to the Pacific. It is idiotic to allow these trains in the Columbia Gorge.
Response: Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.	
Janes MD, Merle	Do we REALLY need an explosion and deaths before we act against this? Aren't we smarter than that?
Response: Comment acknowledged.	
Janzen, Gayle	The people of WA state want to move forward with alternative energy as we want to start mitigating climate change. The dirty energy companies want to destroy our state for their own greedy agenda and refuse to accept the fact that their product will no longer be used in the future. We need that future to be now, instead of allowing them to turn WA into their very own dirty energy hub as they rake in the billions, while they put our communities, air and waterways at risks. Increasing the amount of dangerous oil trains through our neighborhoods only increases the possibility of a disaster. What about "we don't want exploding oil trains in our neighborhoods," does the dirty energy industry not understand??
Response: Comment acknowledged.	
Johnson, Steve	Such a shallow, fragile bay needs to be protected. Stop the new terminal in Tacoma, too.
Response: Comment acknowledged.	
Joy, Amber	We need to invest immediately and heavily in clean energy R & D. We are polluting our planet to a point where we are getting sick.
Response: Comment acknowledged.	
Julian, C	The DEIS findings for these projects show serious risks, impacts, and potential environmental damage. Building more infrastructure for yesterday's dirty energy is the wrong path to meet today's and tomorrow's energy needs as well as being a big economic gamble. The prospect of short-term jobs for a limited number of people cannot outweigh the long-term economic and environmental damage that would be the cost of those few jobs. "
Response: Comment acknowledged.	
Keils, Mary	Please stop the insanity of the dirty and dangerous Westway and Imperium oil projects in Grays Harbor. The 45 permanent jobs at the terminals and about 100 in rail and marine operations hardly seem worth the very real risks (namely another major oil spill or a train accident--which would be when not if) outlined in the DEISs. People in charge must have forgotten the barge accident off Grays Harbor that was just in time for Christmas 1988? No amount of company money would be able to make up for an accident that would devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters. It's madness to build more infrastructure for yesterday's dirty energy. When will WA state go beyond lip service and start leading on creating more jobs that rely on safe, renewable clean energy? I urge you to make it now instead of gambling with companies who only want short-term profits.
Response: Comment acknowledged.	
Kersting, Kassandra	Again prevention is the best cure..... .....
Response: Comment acknowledged.	
Kreilkamp, Mark	Washington state should continue to lead on safe, renewable clean energy solutions and say no to more oil and coal."
Response: Comment acknowledged.	
Kupinse, William	The rapid increase in rail shipments of oil throughout Washington State represents a major threat to human health and safety.
Response: Final EIS Section 4.7, *Impacts on Resources*, has been revised to more fully describe potential impacts on human health.	

Kus, John R	Do we have any children we love more than money? Remember they can't EAT,DRINK or BREATH MONEY! That seems to be all we are leaving them.
Response: Comment acknowledged.	
Kusuda, Charlie	Oil and coal companies obviously do not care about the potential impact of a derailment. Their intention is only to minimize costs and maximize profits. Instead, they should prioritize the environment and the well-being of present and future generations by investing in facilities and methods that enable sustenance and improvement of qualities of life. Their huge profit margins enable this type of focus, and should therefore be their responsibilities.
Response: Comment acknowledged.	
LaVonne, Nadine	Oil tankers (6 mile long trains) have heavy crude that sloshes around inside banging against the sides, and it extremely heavy on the tracks, slowly damaging them for more oil (bomb) trains and for passenger traffic that may well be derailed by damaged tracks. DON'T BE PART OF THIS CONTINUED DANGER OR DEATH TO WASHINGTON THE STATE, THE RESIDENTS, OR THE PLANET.
Response: Comment acknowledged.	
Laws, David M.	It is outrageous that Americans are subjected to bombs running through their communities. Let's not tolerate that here!
Response: Comment acknowledged.	
Lawson, Gail	Why we continue to allow and assist the fossil fuel industry to jeopardize our health and environment is beyond reason.
Response: Comment acknowledged.	
Lawton, Larry	I live in Grays Harbor County. Though I don't live in any of the towns the trains would pass through, I do depend on Aberdeen for shopping, transportation connections, and power and water. An oil train derailment and explosion could destroy downtown Aberdeen, close the roads, and make life here hard or impossible not just for the actual victims, but for many people in the surrounding areas. Water pollution could destroy Grays Harbor forever (in human terms.) Alaska has still not recovered from the Exxon Valdez disaster. We have had enough forest fires (possibly exacerbated by warming from burning too much oil already!), without adding the risk of exploding oil trains burning down more of our forests, homes, and farms. The oil companies get the profits and we get left with the mess, as always. Oil companies are notorious for refusing to clean up their messes or compensate their victims. Finally, though it is a minor matter in comparison to the life and death risks above, it is a serious inconvenience to people driving and shopping in Aberdeen to have so many long, slow freight trains blocking access for many minutes at a time. Aberdeen, and most of the other towns along the rail line, are not set up to handle heavy, frequent train traffic. No! We don't want oil trains in our community. We don't want to contribute to destroying the earth and we don't want the risk of having our community or local environment ruined either. Thank you.
Response: Comment acknowledged.	
LeBlanc, Judy	As a person of faith, This is a moral concern as it poses grave risks for creation and life.
Response: Comment acknowledged.	
Lehrer, Susan	STOP the WA State OIL TRAIN invasion. INVASION is the correct image as Chevron has probably bought out any real opposition. These bribed or threatened officials are like the foreign troops Rome used to subjugate their conquered territory. The PAID MERCENARIES, in this case, are our elected representatives. Have you become the enemy?
Response: Comment acknowledged.	
Livingston, CJ	I urge you to do everything in your power to stop the dirty and dangerous oil projects in Grays Harbor. The DEIS findings for these projects show serious risks, impacts and potential environmental damage to environments along the travel route.
Response: Comment acknowledged.	
Loftness, Kim	NO MORE EXPLODING OIL TRAINS !!!
Response: Comment acknowledged.	
Malone, Mark	This is a really bad idea.
Response: Comment acknowledged.	
Moggio, Deborah	PLEASE, think of your grandchildren!!!

Response: Comment acknowledged.	
Morgan, Nancy J	Being a long-time Northwest resident, yet also having lived in two areas of the country known for their mineral extraction, I know what impacts the proposed transportation would have. I urge you to look much more comprehensively at this and reject ANY more construction or transportation related to oil by rail.
Response: Comment acknowledged.	
Morphew, Karol D.	Global Warming is accelerating. Its many impacts continue. It is time to leave non-renewable resources in the ground. Greed and profit are obscene when gained at the expense of a liveable planet.
Response: Comment acknowledged.	
Newell, Sally	My community of Underwood in the Columbia River Gorge National Scenic Area is along the rail route for Baaken crude headed for Gray's Harbor. We already get many railroad-caused fires here. Bomb trains almost guarantee that the scenic area will suffer catastrophic wildfire damage.
Response: Comment acknowledged.	
Newman, David	(Why DEIS labeled environmental damage as 'potential' rather than real is beyond me. Harmful global climate change due to carbon-mitting fuel is a proven fact, not a potential.)
Response: Comment acknowledged.	
nobacon, danbert	It is game-over for the expansion of fossil fuel infrastructure or, with the mechanisms built to continue fossil furl production fifty years into the future, game over for the human habitability of the planet. We still have a choice. I urge you to do everything in your power to stop the dirty and dangerous Westway and Imperium oil projects in Grays Harbor.
Response: Comment acknowledged.	
Nuckels, Gail	We don't need more oil train traffic in our state. The risks are just too high both on the state level and for the world. In addition they are a drag on the economy. Fossil fuels are outdated fuels from the 19th century and must be phased out as quickly as possible if we are to have any chance of mitigating Climate Change. We need to move to wind and solar to supply our energy needs and to provide the 21st Century jobs that we all want.
Response: Comment acknowledged.	
Panciera, Jeffrey	None of the corporations who urge us to be good sports and live in danger so they can make good profits, none of them could withstand the blow of actually paying for loss of life, property and pollution of the environment. I don't want my state to be a lab where they conduct experiments in risk and return - and don't pay.
Response: Comment acknowledged.	
Pasqua, John	no more exploding trains.
Response: Comment acknowledged.	
Rabaglia, Melanie	I live here- no oil trains!!!
Response: Comment acknowledged.	
Reep, Irene A.	no more mile long oil train derailments and/or explosions, no more global warming gases into our atmosphere. "Keep it in the ground!"
Response: Comment acknowledged.	
Scholten, John D.	There are large areas in Grays Harbor county that are very important for birds for feeding and resting as they pass through.
Response: See Response to FL1-1.	
September, Mary	I live and work in Edmonds and my child goes to school here - right on the train track. I urge you to do everything in your power to stop the dirty and dangerous Westway and Imperium oil projects in Grays Harbor.
Response: Comment acknowledged.	
Skenazy, Judith	This is the wrong direction for our state and our country and the Earth. Support clean energy and do not wish the pollution from oil in and on our waterways.
Response: Comment acknowledged.	

Skinner, Reberta	I oppose any oil train activity in Washington state. Not only the chance of a derailment harming people and the environment, another risk is the potenial of a large scale earthquake which we are being taught to prepare for now. A major earthquake would create such devastation then to have numerous oil trains burning/blowing up would destroy huge portions of our communities.
Response: Refer to the Master Response for Earthquake Probabilities.	
Smets, Martine	Let's work towards reducing pollution from dirty sources of energy and to protect our threatened environment. Let's look towards the future, not the past.
Response: Comment acknowledged.	
Stabel, Dan	have you seen all the urban grade crossings?
Response: Comment acknowledged.	
Stapp & Everett, Sally & Brigham	I was delayed last summer as a mile long crude oil train crossed Burlington Blvd. Multiply my 8 minute wait by the dozens of cars going both directions on this busy street of commerce and multiply by all the cars at every intersection through every city along the route. Please study the impact of these interruptions to our communities. Also, please study the archeological damage as the Grays Harbor project disturbs soil and lands once occupied by our Native American tribal communities. Consider the history and artifacts that could be damaged and/or lost during the massive digging operation they have planned. Most importantly please study the CUMMULATIVE impacts of ALL coal and crude oil and natural gas projects proposed by the captains of the fossil fuel industries. Please study the insurance policies that these companies and railroads have in terms of who will pay for the damage of the inevitable derailings, explosions, fires, spills and leaks into our oceans, rivers, creeks, wetlands, bird habitats and human communities. As Washington State embraces renewable alternatives (solar, wind, biofuel, etc.) to fossil fuels the data is pouring in. Please study how our state and region can power our world with renewable energy systems and compare the costs of developing these clean energy systems vs clinging to dirty, damaging systems of last century. The proposed crude oil by rail project in Gray's Harbor and all other Northwest ports is the wrong direction for our state and I urge you to do everything in your power to stop this dirty and dangerous project. This proposal carries significant risks for communities in Washington. A full evaluation must consider the risk of train derailments, accidents and explosions, the public health impact of increased oil train traffic, the economic risk of investing in fossil fuel infrastructure as we increasingly transition to clean energy, the climate pollution from transport and processing of this crude as well as the lifecycle emissions from Bakken and tar sands feedstocks, danger to waterways, and other impacts.
Response: See Chapters 3 *Affected Environment, Impacts, and Mitigation* and Chapter 4 *Environmental Health and Safety* for descriptions of potential impacts that could result from the proposed action. Also refer to the Master Responses for Liability and Responsibility for Incidents, Cumulative Impact Analysis, Economics, Social Policy, and Cost-Benefit Analyses, and Connected or Similar Actions.	
Sullivan, Candace	Lower Washington State train routes pass through Columbia River and tributary areas that are in need of protection from potential spills, derailments, explosions, and other environmental disasters. Railway tracks and trains are not currently updated sufficiently to protect against such disasters. Until this is done, please delay any action on the Grays Harbor rail terminal.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Sullivan, Jean	Our environment is under assault.
Response: Comment acknowledged.	
Taylor, Kirk	Damage that will likely be as difficult to clean as Prince William sound which is still suffering from crude oil in the sand decades later.
Response: Comment acknowledged.	
Thompson, Anita	Massively increased oil train traffic isn't just a threat to communities near Anacortes and Grays Harbor - it threatens the Columbia River, Puget Sound, and people throughout Washington who live along rail corridors. More than 800,000 Washingtonians live in the oil train blast zone,3 the area that could potentially be impacted by an oil train derailment and explosion, like the worst-case oil trains disaster in Lac Megantic, Quebec that killed 47 people.
Response: Comment acknowledged.	
Tyrie, Elaine	I loved in Grays Harbor County, and I know how essential and fragile the ecosystem is. Native people of the region, fishermen of the region, the vast bird, shellfish and fish population depend on a healthy environment.
Response: Comment acknowledged.	

Van Lawick, Liliana	Shell's proposed crude oil by rail project in Anacortes is the wrong direction for our state and I urge you to do everything in your power to stop this dirty and dangerous project. This proposal carries significant risks for communities in Washington. A full evaluation must consider the risk of train derailments, accidents and explosions, the public health impact of increased oil train traffic, the economic risk of investing in fossil fuel infrastructure as we increasingly transition to clean energy, the climate pollution from transport and processing of this crude as well as the lifecycle emissions from Bakken and tar sands feedstocks, danger to waterways, and other impacts." There is no consideration to human/animal/environmental safety in this plan. It clearly serves only corporate profits and greed with no thought to anything beyond that. It is a desperate, last ditch effort to grab every possible consumer dollar with only life itself as collateral damage.
Response: This comment is in reference to a different project.	
Vavrek, Jean	Please act responsibly for people and the environment instead of to increase Big Oil's profits.
Response: Comment acknowledged.	
Waggoner, Doris	Grays Harbor, Washington, is in a particularly vulnerable area. To stress just two areas of concern, the major route to get to Grays Harbor, and the Harbor area itself. The route to get to Grays Harbor from the east is along the Columbia River, much of it through the Columbia River Gorge. This scenic area provides a major part of the tourist area of both Washington and Oregon. The Gorge is also a very windy area, where train traffic is unstable. Trains could easily collide with each other. The route is not straight, but curved along the base of cliffs blasted out of rock, with short sight lines meaning collisions are possible. With oil trains, explosions from collisions would be inevitable over the long run. Grays Harbor is a hugely important fall to spring feeding grounds for migrating birds, especially shore birds and waterfowl. Millions of these birds, many of whom migrate thousands of miles, some from the Antarctic to the Arctic, stop to rest in Grays Harbor on their way to their breeding grounds. Others stop here to breed. Oil spills from tankers, barges, and filling huge tankers to send to Asia would have a devastating effect on wildlife. In addition to the effect on bird life, Grays Harbor is home to all the smaller flora and fauna that feeds the birds. Oysters, clams, and in some cases fish farms populate parts of Grays Harbor, an important cash crop. These would be totally wiped out, not for one season, but for many seasons to come, with just one oil spill. New research has indicated that China doesn't even need this coal or oil. The price of both has dropped to the point that both the US and Canadian companies are having to subsidize the extraction and of the coal and oil, holding it until the prices go up enough to justify sending it to China. I could provide many other reasons, but I hope this is sufficient to demonstrate the importance of cancelling the idea of allowing oil trains, and coal trains, to flow through Washington state to refineries to be sent to China. So why are we investing in the infrastructure making it possible for megacompanies, and China, to make money off of resources which pose great risk to Americans, and which promise us little or nothing in return?
Response: See Response to FL1-1.	
Warren, Kay E.	Does anybody read Sierra Club, Water Keepers Alliance? It is at a point of no return for waterways world wide due to oil, coal. I campaigned against the Hanford site years ago and we were assaulted, called nuts, arrested, and look at today. Nuclear waste takes a half million years to biodegrade and storage only last a fraction of that time then starts leaking. NOw we have a serious problem there and we were right to try to stop it. Our government is worthless when it comes to protecting Americans.
Response: Comment acknowledged.	
Wilhite, Barbara	Washington residents and their health are much more important that a companies profit.
Response: Comment acknowledged.	
Williams, Kendra	I worry about oil spills in our delicate Puget Sound and all our wildlife.
Response: Comment acknowledged.	
Woodward-Rice, Claudia	Millions of people live near the rail tracks transporting oil- 800,000 in WA alone. The possible damages to infrastructure, schools and hospitals, employment in other industries, and the environments we depend upon from these explosive "bomb trains" make the risks of this industrial growth more costly than can be justified. Only bullying tactics and lobbying dollars that have gotten the issue this far. Washington State must not be sacrificed as a portal for fuel export at the risk of the lives and health of its citizens.
Response: Comment acknowledged.	

Zarlin, Elijah Ion	No-Fracking
Response: Comment acknowledged.	

FL6 Earth Justice

Comment FL6-1

EARTHJUSTICE

ALASKA CALIFORNIA FLORIDA MID-PACIFIC NORTHEAST NORTHERN ROCKIES NORTHWEST ROCKY MOUNTAIN WASHINGTON, D .C. INTERNATIONAL

November 24, 2015

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

Appended below are the names of 31,271 individuals who have submitted public comments opposing the Westway Terminal Company LLC and Imperium Terminal Services' proposal to expand existing bulk liquid storage terminals located at the Port of Grays Harbor Terminal 1. In addition to signing on in support of the following letter, 3,728 individuals of the total number have submitted personalized comments. The personalized comments start on page 2 and end on page 259.

RE: Comments on Westway/Imperium Crude-By-Rail DEISs

Dear Washington State Department of Ecology and City of Hoquiam:

The DEISs for Westway and Imperium show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and could cause significant environmental damage. These proposals simply offer too much risk and too little reward. Grays Harbor communities would take on the risk and oil companies would reap the profits, while Grays Harbor would become a throughway for oil headed elsewhere.

Much of what makes Grays Harbor special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters.

The alarming safety record of oil trains means an explosive oil train derailment is not a question of if, but when. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line, from Aberdeen to Chehalis and all the way to the source of the oil in North Dakota and Canada.

There are better ways to meet our energy needs. Washington State is rapidly moving away from fossil fuels and toward clean, renewable sources to meet our energy needs and respond to global warming. Building more big infrastructure projects to transport yesterday's energy sources is the wrong way to meet today's energy needs, and it's a big environmental and economic gamble for Grays Harbor. Washington State should continue to lead on safe, renewable clean energy solutions and say no to more oil and coal.

I support protection of Grays Harbor and its people, and urge you to reject the proposed oil terminals.

Thank you for your consideration,

The Undersigned

HEADQUARTERS 50 CALIFORNIA STREET, SUITE 500 SAN FRANCISCO, CA 94111 T: 415.217.2000 F: 415.217.2040 INFO@EARTHJUSTICE.ORG WWW.EARTHJUSTICE.ORG

Response to FL6-1

Refer to the Master Response for Purpose and Focus of the EIS.

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Draft EIS Chapter 5, *Extended Rail an6-1d Vessel Transport*, addresses potential impacts from rail and vessel transport in the extended study area qualitatively. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Table 7-9. Unique Comments Associated Unique with Earth Justice Form letter

Commenter Name	Comment
Avery, Judy	This plan was already tabled once by the towns of Aberdeen and Hoquiam, because of the locations of the railway, that would block emergency medical care from happening due to increased train traffic and not being able to reach hospitals. Why is this even being proposed again?
Response: Comment acknowledged.	
A, M	It's time to put the environment as the priority over the profits of big corporations!
Response: Comment acknowledged.	
A., Nando	the ignorance of men is the enemy of mama nature why is it that the most educated people commit the worst crimes against nature and humanity? men has turn earth into a painful place for all living beings...when you do wrong nothing goes unpunished Stop the war against the environment by men I blame you for being cruel
Response: Comment acknowledged.	
Abbott, Billie	At which point do we realize that raping and pillaging has actual real world consequences? Thank you for reading my letter.
Response: Comment acknowledged.	
Abbott, Doug	Oil is dirty and dangerous. It needs to stay in the ground. Solar is the future.
Response: Comment acknowledged.	
Abbott, Lawrence	We demand a rapid and just transition to green renewable energy now. Thank you for reading my letter.
Response: Comment acknowledged.	
Abel, Judith	More poisons? More environmental damage? How intelligent is that?
Response: Comment acknowledged.	
Abrams, Gloria	This means of transportation of oil can also be used as a target by terrorist. The damage to civilians would be great.
Response: Comment acknowledged.	
Ackerberg, Susan	I don't choose to blow up for oil.
Response: Comment acknowledged.	
Ackhart, Joseph	Just stop it!!! Do what the people want and Stop with the oil, NOW!!!
Response: Comment acknowledged.	
Acuna, Becky	No, no, no!
Response: Comment acknowledged.	

Commenter Name	Comment
Adam, David	If we put our funds and energy into Solar etc,we'ld sacrifice our DEMISE thru Oil/Coal relinquishment.and,a necessary adjustment I'ld term that a Sacrifice worth making....ESPECIALLY Considrring the options .
Response: Comment acknowledged.	
Adamick, Frank	Keep FOSSIL FUELS in the ground where they can't hurt anybody. We have the technology to build our safe, clean, reliable, renewable energy future. Now we must have the will & determination to make it happen! Thank you for reading my letter.
Response: Comment acknowledged.	
Adams, Audrey	Once an oil spill takes place, it cannot be undone---attempts to clean massive oil spills in the past clearly demonstrate this.
Response: Comment acknowledged.	
Adams, Francine	Time is running out on this planet and future generations will suffer due to the greed of profits from crude oil. Own up and make a change
Response: Comment acknowledged.	
Adams, Lynn	Coal and oil are dirty fuels that foul the air we breath and cause respiratory illnesses. Keep them in the ground and invest in roof-top solar or wind energy and storage batteries instead.
Response: Comment acknowledged.	
Adamson Curlis, Donna	There are no refineries in my county in PA, yet oil tankers have been brought in and an easy stone's throw from an elementary school, far too many of them sit on the tracks. If one of my children was going to that school, I'd not be quiet, call the newspa
Response: Comment acknowledged.	
Adams-Phipps, Asa	Please consider helping us. Thank you so much for reading this letter.
Response: Comment acknowledged.	
Adkins, Randall	Thank you for reading my letter. I wouldn't object to this if the the railroads did a much better job of maintaining their tracks, but history is showing the push the limits & get by w/min. maintenance.
Response: Comment acknowledged.	
Adler, Matt	Build a sustainable future now. Stop expanding oil trade!
Response: Comment acknowledged.	
Adler, Robert	Now is the time to invest in a sustainable energy system. Thank you for reading my letter.
Response: Comment acknowledged.	
Adshead, Darcy	Put our country on the right track... More renewable energy... NOT oil!!!!
Response: Comment acknowledged.	
Aikawa-olin, Kim	We can't afford the toll on our health, safety, and environment that oil transport would bring to this area.
Response: Comment acknowledged.	
Aispuro, Edgar	We don't want this to happen we want prestige forests and clean water
Response: Comment acknowledged.	
Akeia, Randa	NO, do not allow these terminals to happen. We'd carry all the risks, tremendous risks and very little of the benefits
Response: Comment acknowledged.	
Alaniva, Lori	Clean energy technology for all our energy needs already exists! The delay in using it is simply due to corporate greed. Stop the delay; we must switch over to clean energy now.
Response: Comment acknowledged.	
Alberhasky, Craig	Please, we need to get off our oil dependency.
Response: Comment acknowledged.	

Commenter Name	Comment
Albertin, Julia	Don't endanger the State of Washington by having it become a thoroughfare for crude oil transportation !
Response: Comment acknowledged.	
Albro, Nancy	This is wrong! Terribly wrong for the Northwest! Dangerous and filthy!
Response: Comment acknowledged.	
Alcombright, Patty	Enough is enough, we don't want this or need it!
Response: Comment acknowledged.	
Aldrich, Johnnie	The transportation of dirty oil from Canada's east to our west coast involves danger for MANY. Recent incidences of accidents and investigations showing that antiquated train cars are used are reason enough to stop shipments. Please think long-term safety rather than short-term profit.
Response: Comment acknowledged.	
Aldridge, Bruce	If we truly believe in slowing and reversing global warming, shipping the same polluting oil to other countries will only exacerbate the problem of carbon pollution elsewhere; its All the same planet we need to live on.
Response: Comment acknowledged.	
Aldridge, Thomas	The oceans are heating up and the sea lions and seals are dying and the crabs are poisonous. The poles are in a meltdown along with Greenland and the glaciers of our planet. Do we really need to burn more dirty oil and ship it through our communities and
Response: Comment acknowledged.	
Alex, Sheela	We need to bring green energies online; and let the fossilized fossil fuels go extinct, as they will.
Response: Comment acknowledged.	
Alexakos, Irene	This is important to my family.
Response: Comment acknowledged.	
Alexander, Charles	We need clean energy, not more dirty energy.
Response: Comment acknowledged.	
Alexander, Kathleen	Put an end to dangerous fossil fuel transports. Put meaningful efforts into alternative life supporting energies that protect the environment, create jobs and support the economy. Thank you for reading my letter.
Response: Comment acknowledged.	
Alexander, Paul	THE MAJORITY OF US ARE SICK OF THE REST OF THE WORLD WALKING ALL OVER US. WE ARE NOT A PETROLEUM CROSSROADS.
Response: Comment acknowledged.	
Alic, Margaret	Building oil shipping terminals in Washington is in direct conflict with this state's goals for fighting climate change.
Response: Comment acknowledged.	
Alison, Cheryl	We have got to think about this in terms of the future. Please act now.
Response: Comment acknowledged.	
Allen, Andrea K	Let us be reasonable about the energy that we employ to supply our needs. We need clean, safe energy that does not endanger ourselves and the environment with dangerous oil trains.
Response: Comment acknowledged.	
Allen, Edwina	Please - do not allow oil shipping terminals in Grays Harbor. This oil is extremely dangerous, both at the terminals and all across the rail shipping route. The this oil should stay in the ground. Let's develop clean solar energy instead, and have lots of good jobs her in the USA.
Response: Comment acknowledged.	
Allen, Fran	We want to keep our State as clean and healthy as possible. No oil needs to be transported here.
Response: Comment acknowledged.	

Commenter Name	Comment
Allen, Frank	Obama was right. We should leave that oil in the ground.
Response: Comment acknowledged.	
Allen, James	The future of the Pacific Northwest lies in clean renewable energy investment not dirty polluting oil.
Response: Comment acknowledged.	
Allen, Judith	Accidents that have already happened have revealed the devastation and death that can occur. We do not have to sacrifice our lives and our communities to pressure from oil companies. This is about WEALTH, not people. If we don't have as much oil in the future as we had in the past, we will adjust. We need to change the point of view. Please do not approve this dangerous proposal.
Response: Comment acknowledged.	
Allen, Katherine	Let's move in the right direction, away from fossil fuels!
Response: Comment acknowledged.	
Allen, Peggy	This area must be protected from the risks of oil spills and transporting oil. Promising jobs is an easy way to delude some folks into supporting this plan but they also need to know they are putting substantially more jobs at risk.
Response: Comment acknowledged.	
Allen, Susan	We need to do everything possible to stop the fossil fuel industry entirely and transporting this dirty crude must be stopped!
Response: Comment acknowledged.	
Allmann, Gabrielle	The poison and destruction of this beautiful area (and planet) has been executed for too long in the name of progress and profit. It's time to wake up and use our talents and ambition to find clean and renewable energy. Seriously!!
Response: Comment acknowledged.	
Allsup, Romalda	Stop supporting dirty energy and dirty profits, protect the communities that are in peril. Do not allow this area to be used in oil transportation.
Response: Comment acknowledged.	
Allyn, Jim	We must end the use of fossil fuels if we hope to survive. Therefore, I oppose, and must ask you to oppose, any new fossil fuel infrastructure.
Response: Comment acknowledged.	
Almeida Fortunato, Lisa	I need help ASAP!! Can an attorney please call me. Lisa Almeida Fortunato. 856-217-1670. almeidalisa4@gmail.com. My family & me are very sick (environmental illnesses). We are backed by a team of medical professional & now we need legal help. Thank you
Response: Comment does not relate to the propsed project or EIS.	
Almodovar, Robert	It is long past time, that we give up our dependence on oil. It can't be done in one step, but we have to start somewhere. It is time to put a lid on selling products that use oil and gas to operate. Again, it can't be done in one step.
Response: Comment acknowledged.	
Al-saadi, Karen	We need to take a long term view of our environmental decisions so that our children and grandchildren will be able to live in a relatively healthy and safe environment.
Response: Comment acknowledged.	
Alt, James	The risk of oil contaminations is just to high. Thank you for reading my letter.
Response: Comment acknowledged.	
Amande, Kiah	Please see the bigger picture. Throughout history, with all the spills, fires and deaths that come with your industry, why repeat and then expect us to pay for your damages. In today's technology, with young college, eager, hungry and fresh minds, please
Response: Comment acknowledged.	
Amann, William	Oil should be kept in the ground now, to be used judiciously by future generations.
Response: Comment acknowledged.	

Commenter Name	Comment
Amato, Nancy	Thank you for reading my letter. Our beautiful country has already taken a hard enough beating from pollution, mining, etc.! Wake up! To allow such a project to be done, would truly be a rape of the land. Put this same money into solar advancement and imp
Response: Comment acknowledged.	
Amaya, Catalina	Thank you for reading my lettWhy are we transporting oil anyway? Shouldn't it stay here where it'll do most good? It's not something we need to ship out to other countries when we can do so much here. Wouldn't be better to keep it on our soil than to put
Response: Comment acknowledged.	
Amaya, Elsy	Government have to look for new and clean ways of energy, other countries are ahead of us we really need to think about the future of out planet for our children, please stop anything that has to do with oil.
Response: Comment acknowledged.	
A-mccoy, Deniz	We need to be moving towards a cleaner, better future. Building oil shipping terminals would be taking us a step backwards.
Response: Comment acknowledged.	
Amdahl, Erv	We need to protect our water supply more than oil. We have other options for energy than oil, but we cannot live with out non polluted water
Response: Comment acknowledged.	
Amoruso, Debra	Please do not allow oil companies to expand their Northwest operations by building oil shipping terminals on Washington's coast. We do not want to take risk of oil spills and carbon pollution on land and over water.
Response: Comment acknowledged.	
Amundson, Beret	This is important now.
Response: Comment acknowledged.	
Horseshoecoins And Antiques	One thing we learn from history, is that we don't learn from history. To show how irresponsible BNSF is in regards to protecting citizens along the rail routes, they were using much more unsafe single wall tanker cars, it wasn't until a couple of major accidents and loss of life, that they were forced to rebuild their fleet and use double wall tanker cars. That alone should raise eyebrows. It's the essence of the corporation that proves, profits over all else. How about this, if we must transport oil and unsafe chemicals, rather than having them go through countless towns and cities, at such a risk, build pipelines, while were at it, we could build even more pipelines and transport fresh water from areas there is too much to areas that are in record drought. Projects like this would help rebuild America, put folks to work and pipelines are proven much safer, quiet and efficient over rail. The part of rail that should be increase is in the passenger side of things. By restoring and opening more defunct rail depots, many of them historic in nature, it would help rebuild each city and town that regained it's passenger station, plus remove countless vehicles from the roadways, which are so plugged up, passenger rail should be a glaring opportunity across the country. We just have too many lame politicians that answer to major corporations, instead of the people they are suppose to support! Thank you, Bill Becht Blaine, Wash.
Response: Comment acknowledged.	
Andersen, Vikke	We all know that the only people who benefit from transporting oil anywhere are the oil companies and their minions. The oil is not for our benifit. It's to be sent over seas. Local people get all the expenses and environmental dangers, the earth, the sea
Response: Comment acknowledged.	
Anderson, Amy	WE AS CITIZENS OF THIS COUNTRY DEMAND AN END TO THE EXTRACTION OF LIFE-KILLING FOSSIL FUELS AND AN IMMEDIATE ALL-OUT SHIFT TO WIND, SOLAR AND ELECTRIC CARS. DO YOU CARE ABOUT YOUR CHILDREN'S FUTURE? APPARENTLY NOT. PLEASE CONSULT YOUR CONSCIENCE AND DO
Response: Comment acknowledged.	
Anderson, Benjamin	The expansion of infrastructure to prop up petrol imports is inexcusable when considering community and ecosystem health. Please discontinue plans to build terminals at Grays Harbor.

Commenter Name	Comment
Response: Comment acknowledged.	
Anderson, Bruce	I oppose ANY expansion of the fossil fuel industry whose DC lobby has made a farce out of citizen influence on our elected state and federal officials.
Response: Comment acknowledged.	
Anderson, Cindy	The health & safety of people must be the main focus. No expansion - stop the proposed terminals.
Response: Comment acknowledged.	
Anderson, David	Oil is old technology and dirty and it smells bad. It is a relic of worse, unenlightened times. Keep it in the ground !
Response: Comment acknowledged.	
Anderson, Donna	Big Oil has the $$, Technology, and opportunity to profit from going green.
Response: Comment acknowledged.	
Anderson, Dorothy	So much has been said about this issue for far too long and in every way there is to express the need to stop this insanity. Crude oil is not the answer unless you are determined to create and do whatever it takes for some to get rich by polluting the ea
Response: Comment acknowledged.	
Anderson, Gary	Time to leave fossil fuels in the ground and go green on energy! Thank you for reading my letter.
Response: Comment acknowledged.	
Anderson, Glen	Protect Grays Harbor!!!Protect Earth's Climate!!!
Response: Comment acknowledged.	
Anderson, Glen	Earth's ecosystems are being DISRUPTED AND DESTROYED by fossil fuels. WE MUST PROTECT GOD'S CREATION by PREVENTING FURTHER ABUSE.
Response: Comment acknowledged.	
Anderson, Jack	Oil on a grand scale is done. The monster doesn't need to grow larger, it's a waste of time and money and energy. Thank you for reading my letter.
Response: Comment acknowledged.	
Anderson, Jackie	Please, protect the peace health and safety of our coastal communities in Northwest Washington. The traffic of crude oil by rail and tanker will negatively affect the tribal culture, local economy, and but our coastline and ocean at risk.
Response: Comment acknowledged.	
Anderson, Janie	WE MUST NOT ALLOW ANY EXPANSION FOR THESE DANGETOUS OIL TRAINS, TRAINS THA HAVE NO BENEFIT FOR OUR COUNTRY BUT CARRY HUGE DANGER
Response: Comment acknowledged.	
Anderson, Joan	We do not want our land and waters destroyed by a catastrophic event that can occur during the transportation of oil products. Please, do not support oil transport by water or land in the Pacific Northwest. Thank you..
Response: Comment acknowledged.	
Anderson, Karen	Bomb trains have no place in America. It's not the train cars, it is the caustic mix inside. That can be fixed, as it is in older oil fields. Spend the money. Save the lives.
Response: Comment acknowledged.	
Anderson, Karen	The Pacific Northwest has much to lose due to the increased possibilty of oil spills and pollution. We should be looking at and using alternative energy sources. The risks of this kind of activity far outweigh the benefits. Earth First please.
Response: Comment acknowledged.	
Anderson, Kelly	Protect our Earth
Response: Comment acknowledged.	

Commenter Name	Comment
Anderson, Kemmer	The trail of oil crude as greed: When will be freed from the fossil fuel creed?
Response: Comment acknowledged.	
Anderson, Lauretta	Why DESTROY some of the most beautiful scenery on this planet to sustain a filthy, obsolete system of energy?? NO!!
Response: Comment acknowledged.	
Anderson, Lesley	Please reconsider a terminal for Grays Harbor Washington or anywhere else. Most of the USA oil shipped now is fracked which means it is the dirtiest and crudest oil and dangerous to ship overseas with a high chance of leaks into the ocean not to mention leaks along the pipeline cross-country getting it to Grays Harbor.Let's get together as humans and do new business deals that find healthier sources for fuel and money-naking. Please reread Dwight Eisenhower's farewell speech asking us all to be skeptical of private business joining with government and government's military might. Yours, truly, Lesley C. Anderson
Response: Comment acknowledged.	
Anderson, Monica	Imagine someone you love being destroyed in body or health by the dangers of a tanker exploding. Perhaps it will be you. Every person affects the world in some way. Please have the courage to make our world better. This is your legacy.
Response: Comment acknowledged.	
Anderson, Nancy	No expansion of oil transport.
Response: Comment acknowledged.	
Anderson, Robert	Thank you for reading my letter.keep fossil fuels in the ground.
Response: Comment acknowledged.	
Andersson, Alissa	We need to keep our coastline pristine. Just say say NO to big oil companies for our children's and Washington's future. My family and I love Gray's Harbor. We visit every summer. Let's keep it clean and beautiful. Just say NO!
Response: Comment acknowledged.	
Andes, John	The draft environmental reviews find that the risks of oil spills during rail transport, at the terminal site, and during marine vessel transport through Grays Harbor cannot be fully mitigated, and that if a spill occurred, the environmental damage would
Response: Comment incomplete.	
Andreatta, Susan	Please stop these oil shipping terminals. We need clean energy!
Response: Comment acknowledged.	
Andretta, Jeaneen	Please stop the dangerous oil trains.
Response: Comment acknowledged.	
Andrews, Judy	Stop the Madness!!
Response: Comment acknowledged.	
Andrews, Lisa	Please think about what's right for the environment and the community. Don't let money cloud your judgment.
Response: Comment acknowledged.	
Andrews, Mark	Thank you for reading my letter. It is time to give up EXPANSION and concentrate on PROTECTION & SUSTAINABILIYY!
Response: Comment acknowledged.	
Andry, Sarah	Thank you for reading my letter. Spend your energy and money on things that will improve your lives in the future not destroy it
Response: Comment acknowledged.	

Commenter Name	Comment
Anestis, DK	End this terribly bad idea.
Response: Comment acknowledged.	
Anger, Barbara	It is so important to preserve and protect our land usage for the life and the beauty of our nation and our citizens. Thank you for reading my letter.
Response: Comment acknowledged.	
Angus, Billy	Big Oil has no place anywhere in the 21st Century and beyond!
Response: Comment acknowledged.	
Ansbro, Michael	We need to invest in renewable energy not needlessly endanger our environment for the profit of out of state capitalists. No oil trains or terminals in the state of Washington!
Response: Comment acknowledged.	
Anselmo, Allison	Please support our environment, it's the only one we have.
Response: Comment acknowledged.	
Antle, Jessi	The United States is at a pivotal point in time to take action to protect out environment and it will take many decisions such as this to activate necessary changes. Thank you for reading my letter. Sincerely. Jessi Antle
Response: Comment acknowledged.	
Antoine, Rosa	Thank you for reading my letter. Fracking is just bad on so many levels. Earthquakes in places that don't usually have them...now there's a clue. The earth will retaliate.
Response: Comment acknowledged.	
Anton, Gloria	I don't want to be the Highway for crude oil, without protection, with aging infrastructure that Congress won't fix, and Corporations aren't forced to keep either their trains or their trucks safe on the road. Our area depends on clean water for fishing, crabbing, and shell fish let alone for drinking. I don't want to be another Florida coast waiting for an oil spill to annihilate my community, tourism, and livelihoods, food and water. Oil barons: Use the land YOU LIVE ON for your distribution/production/refineries. The people's land, cities, states, private property, adjacent property - we don't want you here. I'd rather have millions of wind, solar, and wave generators all over than your death trains/trucks. Stay out!
Response: Comment acknowledged.	
Apone, James	This should be stopped all ready !!!
Response: Comment acknowledged.	
Appelbaum, Barbara	Oil spills are unavoidable nd the consequences are dangerous. Clean energy is the only solution.
Response: Comment acknowledged.	
Appell, Cyrus	The risks of a spill/fire are substantial and it would be reprehensible if you allowed the oil trains to roll!
Response: Comment acknowledged.	
Aquiningoc, Steve	No oil terminals! Love my Washington State want to keep it pristine & Green. So no oil terminals!!
Response: Comment acknowledged.	
Arbess, Saul	The NW must resist becoming another Nigeria, an energy superhighway for a dangerous drug(oil).
Response: Comment acknowledged.	
Ardron, Ronald F	Keep it in Canada!!!!!!
Response: Comment acknowledged.	
Arend, Debra	I reject the proposals for the Grays Harbor terminals. What sense does it make to expand terminals for fossil fuels when the world is turning to clean, renewable energy sources, something that should have been taking place decades ago.
Response: Comment acknowledged.	

Commenter Name	Comment
Arkley, Alfred & Harriet	Oil and water do not mix
Response: Comment acknowledged.	
Armerding, Christopher	Say no to oil, and say yes to alternative fuel.
Response: Comment acknowledged.	
Armstrong, Jude	Grays Harbor is too vital to our way of life to be put at risk by dangerous crude oil.
Response: Comment acknowledged.	
Arndell, Deborah	When humans no longer exist and our ecosystem is decimated, I hope the money you made at the expense of our animals, our loved ones and your family was well worth it.
Response: Comment acknowledged.	
Arnold, Sally	As a nation we need to shift our energy investments into sustainable technologies, not continuing to fund dangerous and discredited sources of energy.
Response: Comment acknowledged.	
Arnold, Tina	Please stop the proposed shipping terminals at Grays Harbor, Washington. We're getting fed up with all the pollution and destruction the oil industry has put us through. Stop this plan!
Response: Comment acknowledged.	
Aron, Elaine	I am surprised that the state of Washington does not grasp the problem of climate change and act to combat it through an emphasis on non-fossil fuel alternatives and a message to fossil fuel companies that the stuff must stay in the ground. Act for your
Response: Comment incomplete.	
Aron, Sissy	We desperately need renewable energy supplies. That needs to be our main focus for now and the future.
Response: Comment acknowledged.	
Aronson, Henrietta	Stop shortening the life of this planet !!!
Response: Comment acknowledged.	
Arreaga, Julio	Protect people and the planet, money doesn't mean anything if we have nowhere to live!
Response: Comment acknowledged.	
Arvola, Andarin	THIS SENIOR CITIZEN HAS LIVED THROUGH THE CONSEQUENCES OF THE BLATANTLY IRRESPONSIBLE ACTIONS OF THE WORLD-WIDE OIL INDUSTRY. THIS IS JUST ANOTHER ENVIRONMENTAL DISASTER THAT WILL HAPPEN! YOU GUYS ARE NOT TO BE TRUSTED!
Response: Comment acknowledged.	
Ary, Sheila	The availble evidence is very clear that these plans for the transportation of the dirtiest and most dangerous form of crude oil from its source in Canada to export terminals on the Washington coast will be disasters waiting to happen. The consequences of
Response: Comment acknowledged.	
Asbell, Ellen	Thank you for reading my letter. America should be putting much more emphasis on clean energy. I'd like our country to be a leader and help the rest of the world to change from fossil fuels to energy sources that won't destroy the planet.
Response: Comment acknowledged.	
Asberry-whitt, Diana	We, the people who inhabit this country, do not wish to be turned into nothing more than a thoroughfare for poison like this, and we don't want all of the risks involved. We don't want to be merely profit for the big oil companies. We fear for our and
Response: Comment acknowledged.	
Ashley, Claudette	Leave all the fossil fuel in the ground. Go SOLAR and WIND Thank you for reading my letter.
Response: Comment acknowledged.	

Commenter Name	Comment
Asmann, Carol	The only way to prevent oil spills is to stop this dangerous expansion. Please do the right thing now.
Response: Comment acknowledged.	
Assalit, Florence	No transport of oil, not safe and not good for our health and the environment.
Response: Comment acknowledged.	
Ater, Dan	This oil (?) isn't needed. Thank you for reading my letter.
Response: Comment acknowledged.	
Atherton, John	Fossil fuel is dying. We need to stop catering to the powerful oil/gas companies and look to our future of renewable energy.
Response: Comment acknowledged.	
Atherton-dat, Lynne	Crude Oil does not fit the needs of the 21st century: for Mother Earth or for us Inhabitants. Thank you for reading my letter.
Response: Comment acknowledged.	
Atkin, Eugene	We need to learn to use less petroleum and not facilitate increased use.
Response: Comment acknowledged.	
Augustus, Nicholas	We must protect this country from further oil spills and related pollution.
Response: Comment acknowledged.	
Auld, Denise	Thank you for reading my letter. I lived 60+ years on the Olympic Peninsula and my grandparents lived on the Long Beach Peninsula, areas both close to my heart. Grays Harbor, and the rest of coastal Washington are a national treasure with unparalleled unique beauty. Please don't sacrifice the paradise you live in for a short-term financial gain that will forever alter your landscape. I've driven through South Dakota and seen the ugliness that bitumen coal and tar sands oil create. Those black tankers and coal trains look like a ribbon of darkness against the land. Fossil fuels are near their end and need to stay in the ground. Be revolutionary, Grays Harbor, and embrace wind power and green energy. I know how much the wind blows on the Washington coast - and there is your gold mine. Be a leader and not a follower - lead the nation to a bright future of green energy. Do not dance with the Darkness which is fossil fuel.
Response: Comment acknowledged.	
Aureli, Anna	Can we all please start investing money on solar energy ?
Response: Comment acknowledged.	
Austin, Christine	Please consider the people of Washington state and our coastlines. We need to stop two terminals in Grays Harbor. This is a very sensitive wildlife area that needs to be protected.
Response: Comment acknowledged.	
Averett, Anthony	Not only must we stop sending incendiary -- and highly toxic -- bombs out into the country on rail lines, but migrate away fro the toxic, polluting, dirty, unhealthful and climate-altering carbon-based fuels.
Response: Comment acknowledged.	
Awsiukiewicz, Eileen	Oil is not the fuel for the future.
Response: Comment acknowledged.	
Ayalin, Ellen P	Keep us alive and healthy. We do not need this slow and dangerous transport to keep us awake at night and ruin our health. Stop this transport in all states.
Response: Comment acknowledged.	
B, Joyce	No More Bomb Trains!!
Response: Comment acknowledged.	
Babrick, Carla	Whatever oil is in the ground should stay there. We have no right to allow anyone to despoil the land, especially for private profit, and additionally endangering people and the land and its creatures by transporting oil.

Commenter Name	Comment
Response: Comment acknowledged.	
Bace, Lori	Please help!
Response: Comment does not relate to the proposed action or the Draft EIS .	
Bach, Jhana	This is not what our community wants.
Response: Comment acknowledged.	
Bagar, Karen	There is so much at stake! The risks of oil spills during rail transport, whether at the terminal site or during marine vessel-transport through Grays Harbor cannot be fully mitigated, and that if a spill occurred, the environmental damage would be signif
Response: Comment acknowledged.	
Bagatti, Vicki	Thank you for reading my letter. Why would a throroughfare for crude oil even be considered? This countryside is not for exploiting and endangering. You are supposed to protect out interests.
Response: Comment acknowledged.	
Bailey, David	instead of expanding oil....lets expand wind and solar power, other countries have done it so can we.
Response: Comment acknowledged.	
Bailey, Greer	This is insanity! Whether it is a pipeline, rail system or tanker; the odds are high there will be a catastrophic spill sooner or later. We don't need this in the NW, especially along the coast. And whatever happened to energy self sufficiency? Why are we
Response: Comment acknowledged.	
Bailey, Marcia	Sacrificing our environment and our cities for fossil fuel expansion is unacceptable. We need to stop the terminals in Grays Harbor WA.
Response: Comment acknowledged.	
Bain, Diana	Thank you for reading my letter. We can't afford the risks. Nor should we be taking the oil or gas out of the ground.
Response: Comment acknowledged.	
Bain, William	The Olympic Peninsula and surrounding area is beautiful and should be preserved. Also, we need to stop trying to make oil cheap; the costs are just too high.
Response: Comment acknowledged.	
Baker, Dyane	We do not need another SPILL or EXPLOSION to ruined our planet STOP STOP!!!
Response: Comment acknowledged.	
Baker, Eldon	Of primary importance: The oil industry is fighting against bringing oil tanker cars to acceptable safety codes!
Response: Comment acknowledged.	
Baker, Janine	Our future is at stake. Please take action to protect our environment. Thank you for reading my letter.
Response: Comment acknowledged.	
Ball, John	Exporting crude oil from North America has to be one of the most shortsighted and irresponsible ideas in history. First World countries DO NOT export raw materials. Wise countries don't brun oil for fuel.
Response: Comment acknowledged.	
Ballenger, Brooks	WE don't need more infrastructure for the obsolete fossil fuel industry. We need to protect the environment and build a sustainable energy system for our children.
Response: Comment acknowledged.	
Ballou, Carol	Keep oil off the rails. Thank you for reading my letter.
Response: Comment acknowledged.	
Bane, James K	This is Canada's crude, let them take these risks.
Response: Comment acknowledged.	
Bangs, Leigh	We know that in the long run we will all be better off if the U.S. does not export fossil fuels.

Commenter Name	Comment
Response: Comment acknowledged.	
Banks, Percival	Thank you for reading my letter. Keep fossil fuels in the ground. Period.
Response: Comment acknowledged.	
Bannister, Martha	I am entirely against new oil terminals on the West Coast, specifically Washington at this time. The Pacific Coast is home to major fisheries and incredible wildlife and we cannot take the risk of harm to these assets.
Response: Comment acknowledged.	
Barbara, Casablanca	We can divert these dirty jobs to cleaner ones. We have to start sometime and we must start now.
Response: Comment acknowledged.	
Barber, Daniel	Keep the oil in the ground.
Response: Comment acknowledged.	
Barber, S	The benefits seem iffy at best for what is clearly an absolute danger to environment, culture, and human safety. Don't do this! Big mistake.
Response: Comment acknowledged.	
Barber, Terry	No dangerous oil trains exploding in or near Oregon's cities.
Response: Comment acknowledged.	
Barber, Virginia	Why should we allow dirty tar sands oil to be transported through our country to any port? The answer is : We should not.
Response: Comment acknowledged.	
Barcilon, Danielle	Transporting such an explosive and dangerous substance puts Americans, as well as wildlife, in jeopardy.
Response: Comment acknowledged.	
Bard, Enzo	Consider the health dangers that the proposal carry with it. Reject the proposals.
Response: Comment acknowledged.	
Bardell, Tim	Thank you for reading my letter. Burning oil is adding to climate change, so there is no reason to make oil extraction more profitable. Oil should stay in the ground, where it belongs, not traveling through our communities.
Response: Comment acknowledged.	
Barfield, Ellen	They wanta bring this stuff thru Baltimore too. NOT ANYWHERE!!!
Response: Comment acknowledged.	
Barmack, Laura	Thank you for reading my letter. It is time our government began not only to believe in climate science, but to do something about the devastating effects of climate change on the environment. Pursuing fossil fuel exploration, development, and transport -- whether for America's use or for export -- is just kicking the can down the road and pretending that it is okay to poison someone else's air or inflict lifelong respiratory illness on someone else's children or destroy someone else's soil or rivers. The Age of Insatiable Corporate Greed has to be brought to an end by individuals taking concerted action against them and by local governments stepping up to their responsibility to work in the public interest. Fossil fuel must remain in the ground for this planet to survive in any recognizable form. This is what the science tells us. In light of this information, the transport of crude oil by rail across this country is utterly unacceptable and delusional. We have seen what happens when fossil fuel companies make promises they cannot possibly keep. We also know that dishonesty prevails in fossil fuel companies because of their sole function: to make profits for shareholders. The NY State District Attorney's Office is now opening an investigation into Exxon-Mobil's lies about its knowledge of the devastating effects of its business practices on climate change. This investigation is likely to target other fossil fuel companies as well. Please do everything in your power to stop all initiatives that put at risk human health, our precious environment and even our lives. Please defend our precious, irreplaceable shorelines, our land, our marine life, our lives by refusing to allow the building of transport terminals or the transport of oil and gas products across this country. Thank you.

Commenter Name	Comment
Response: Comment acknowledged.	
Barmichael, Debra	DO THE RIGHT THING FOR ONCE!!! DONT TAKE THE BRIBE & DO US RIGHT!!!!
Response: Comment acknowledged.	
Barnett, Dorothy E.	Just say no! No more disastrous train wrecks that harm our environment and our health.
Response: Comment acknowledged.	
Barnett, Mary	We don't need any more explosive trains going through our towns.
Response: Comment acknowledged.	
Barrera, Leo	AStop this madness.
Response: Comment acknowledged.	
Barrett, Donna	I live in the Hudson Valley where tar-sands carrying "train bombs" necessitate explosion drills in local schools, as told to me by the state legislator of that county. Don't subject Northwest children to this idiocy.
Response: Comment acknowledged.	
Barrett, Elizabeth	It is time to do the honorable thing and stop your dangerous expansion of oil transport. It is more important to treat our planetary home with respect than to increase your bottomline.
Response: Comment acknowledged.	
Barrett, Kathy	THE AMERICAN PEOPLE DO NOT WANT THESE OIL TRAINS
Response: Comment acknowledged.	
Barrie, Donald	No terminals need to be built, on our Washington coast or Oregon's coast. Everyone needs jobs, but not at the expense of the future generations of people living in the North West. We all must to take a stand against moving oil or coal anywhere. Leave it in Canada. If you are uncertain, please search for and read the "LEAP Manifesto" designed and created by thinking Canadians to help us all plan for the future.
Response: Comment acknowledged.	
Barrington, James	Please oppose the two proposed oil terminals in Grays Harbor, Washington. This will protect communities from crude oil rail traffic, oil spills and all of us from carbon pollution and green house gasses.
Response: Comment acknowledged.	
Barron, Currie	Do you want the Earth's environment to support the lives of your descendants? Then stop polluting it with oil extraction, transportation and use!
Response: Comment acknowledged.	
Barron, Lisa	I am appalled that this country has become a highway for the oil industry to ship dirty oil all over the world, without our receiving the oil itself or any benefit. Meanwhile we get the risks , the pollution, the environmental destruction and despoilati
Response: Comment acknowledged.	
Bartes, Lili	Please protect Grays Harbor. We elected you to listen to us, to do the will of the people. Thank you for reading my letter.
Response: Comment acknowledged.	
Barton, Durk	Stop the madness.The nightmare must come to an end! Politicians have failed us. Let the people rule! Thank you for reading my letter. Stop the madness, the politicians have failed the people! The safety of the community is the most important concern. Don'
Response: Comment acknowledged.	
Barton, Matthew	stop tar sands movement and be good to environment all in one.
Response: Comment acknowledged.	
Barton, S	Stop bending over for the oil companies who kill our ecosystem for profit.

Commenter Name	Comment
Response: Comment acknowledged.	
Baskin, Harriet	The risks of accidents and ensuing spills is too great.
Response: Comment acknowledged.	
Batchelder, Patricia	Thank you for reading my letter. Please slow the dangerous expansion of oil transport.
Response: Comment acknowledged.	
Batchelder, Patti	We need a huge, immediate investment in solar, wind power, and modernization of our electric grids.
Response: Comment acknowledged.	
Bateman, Robert	We must reevaluate our use of all fossil fuels. More money from the Oil Imports and exports as well, need to be spent developing alternative clean energy sources. We should also find a way to clean the air of pollutants all over our fragile planet. Tha
Response: Comment acknowledged.	
Battaglia, Gail	Don't risk Oregon's beauty and natural resources!!
Response: Comment acknowledged.	
Battin, Sharlot	ALL shipping through communities large and small should be halted NOW. The terminals are only part of the story and an excuse to increase train traffic throughout the Northwest! Thank you for reading my letter.
Response: Comment acknowledged.	
Battoni, Linda	It is time to face the reality that fossil fuels such as oil should stay in the ground. We should be moving toward renewal energy. Shipping oil is inviting a new catastrophic spill.
Response: Comment acknowledged.	
Bauer, Elaine	We cannot afford the hazards that these Corporate risktakers are trying to foist upon our precious lands. Leave the filthy oil in the ground, where it can not pollute and destroy.
Response: Comment acknowledged.	
Bauerle, Sharon	Better to have built the pipeline Obama vetoed.
Response: Comment acknowledged.	
Bayerl, Whitney	This is a dangerous step backwards. Time and time again when major derailments and explosions happen we continue to wonder why this is allowed to continue, please protect communities and habitats from the destruction caused by these oil trains. Thank you
Response: Comment acknowledged.	
Baynard, Myriam	a big NO of expansion of oil transport it is risky and dangerous
Response: Comment acknowledged.	
Bea, Lorraine	We need to move to alternatives for energy
Response: Comment acknowledged.	
Beaird, Heather	Thank you for your consideration of these petitions.
Response: Comment acknowledged.	
Bealmear, Kayla	I care about the environment and my child living in an era with pollution. We need no more pollution please.
Response: Comment acknowledged.	
Bean, Robin	As custodian's of the planet, we need to do a better job of protecting and preserving our environment. This proposed action does neither. It's time to stop saying it's traditional or that's the way it's always been. We must move forward and away from fossil fuels.
Response: Comment acknowledged.	
Bearden, Karen	Stop the madness!!!
Response: Comment acknowledged.	

Commenter Name	Comment
Beardsley, William	I have training in Disaster preparedness, and what is being faced is beyond comprehension.
Response: Comment acknowledged.	
Beaudry, Ursula	Thank you for reading my letter. Crude oil is the main cause of climate change. Please let the next generation have a cleaner environment than we have now!
Response: Comment acknowledged.	
Beaven, Nancy	This is not just about this one community---this is about protecting the whole planet, and leaving a livable one for our children and their descendants. It is also about recognizing the sickness of those oil CEOs, and their accomplices, whose greed has ma
Response: Comment incomplete.	
Beck, Thomas	We should not be exporting oil AT ALL! Also we need to reduce the BOMB TRAINS!
Response: Comment acknowledged.	
Becker, Marlys	Money greedy persons must stop destroying mother earth and the homes of our people.
Response: Comment acknowledged.	
Beegle, Margaret	The only viable future lies with renewable energies. Thank you for reading my letter.
Response: Comment acknowledged.	
Beene, Dolores	I think it is shipping crude oil by pipeline is too dangerous to pass through areas where we have large areas of underground water. Too many chances for disaster ... both for the crops and natural reservoirs of water.
Response: Comment acknowledged.	
Behrens, Marcia	My husband and I strongly oppose the building of oil shipping terminals on Washington's coast, which would turn the Northwest into a thoroughfare for crude oil transportation by rail and oil tanker. Specifically, we oppose the building of two terminals p
Response: Comment incomplete.	
Beigel, Lynda	For my grandchildren in Washington and the Pacific Ocean's protection
Response: Comment acknowledged.	
Beilin, Robert	to build an oil terminal in an earthquake and tsunami zone shows no regard for the inhabitants or the environment
Response: Comment acknowledged.	
Bejgrowicz, Thomas	Knowing what is right or wrong has nothing to do with your party affiliation or your financial situation or anything of the sort. When an idea is bad or good, it's clear to see. This idea stinks and is short-sighted on every level. It needs to go away, pr
Response: Comment incomplete.	
Bell, Barbi	No no no.
Response: Comment acknowledged.	
Bell, Kelsey	Protect the beautiful Pacific Northwest!
Response: Comment acknowledged.	
Bell, Merriann	Excuse me, but have you ever spent any time in the area that is slated for these oil terminals? If so, you will have witnessed a spectacular, wild area- full of wildlife, peace, beauty. PLEASE do not allow the ruination of any land anywhere just to perpetuate this filthy and now outdated form of energy. (What's left of) the integrity of this planetis far more valuable than the convenience of fossil fuel power, or the money to nbe made from it. Choose for the long-term and for all life. No oil terminals! Thank you.
Response: Comment acknowledged.	
Bellinger, Michael	It's not worth taking the chance of a spill in our waters.
Response: Comment acknowledged.	

Commenter Name	Comment
Bell-Kaul, Ph.d., Joan	Have we not had enough degradation of our environment from the oil industry? When our potable water, life-sustaining waters, and viable land are saturated with spilled oil, corporate profits will do nobody any good!
Response: Comment acknowledged.	
Bender, Linda	Don't vote republican for any office in 2016 who said they will overturn President Obama's decision.....
Response: Comment acknowledged.	
Benefield, Julianna	NO ,NO ,NO We don't need to go this route .. we don't need oil running in the veins of America .We need to go green with air . wind & sun ... not messy oil. Air , wind & sun do not pollute they add good to all of us.
Response: Comment acknowledged.	
Benford, AL	Thank you for reading my letter. Any investment in developing and transmitting energy should be made in life affirming renewable/sustainable sources of energy. Continuing developing and transporting fossil fuels, which are air and water polluting and life
Response: Comment incomplete.	
Benjamin, Patricia	Instead of becoming a resource colony (aka extraction sacrifice zone) for Asia and Europe, we should be working to build a post-carbon future.
Response: Comment acknowledged.	
Bennett, Virginia	My memory is functioning just fine, and so I remember the terrible effects of the accident with the Exxon Valdez. I remember the huge swath of Northwest coastlines it ruined and the years it took (is taking?) to recover. Building multiple terminals along
Response: Comment incomplete.	
Benson, Liane	Please keep our beautiful harbor a pristine place for wildlife and birds.
Response: Comment acknowledged.	
Berg, K.	Thank you for reading my letter. It is time to do what is in the best interest of citizens. The dollar profit MUST NOT be the priority.
Response: Comment acknowledged.	
Berg, Laura	Oil shipping terminals, and the trains that feed them, are a sad, last gasp of the fossil fuel industry. That last gasp though, could cause horrible pollution, environmental destruction and more climate devastation if allowed to be built. Do what is rig
Response: Comment incomplete.	
Bergalis, Anna	Because of their corruption , dirty
Response: Comment incomplete.	
Bergen, Jeffrey	The challenge of our time is preventing the destruction of the environment and preserving and protecting the resources we have. Be on the right side of history and make decisions that move us away from dirty energy and choose clean energy.
Response: Comment acknowledged.	
Berger, Joshua	We must wean ourselves from fossil fuels. They are of no benefit to the Pacific Northwest, or to our world. Invest in renewable energy. Do not allow the continued extraction, exploitation, and pollution to continue. This is not good for anyone except the
Response: Comment incomplete.	
Bergholt, Sharyn	Thank you for reading my letter. Please do the right thing.
Response: Comment acknowledged.	
Berke, Madeleine	Thank you for reading my letter. We don't need more dangerous oil transport.
Response: Comment acknowledged.	
Berland, Paul	Crude oil is an anachronism. We need renewable energy solutions Now before our world is destroyed by climate change.

Commenter Name	Comment
Response: Comment acknowledged.	
Bernales, Giuliana	Thank you for reading my letter. Stop this dark energy industry. In today's world, the tendency and proper moral action is towards humanity and the earth in order to transcend from this industrial age of pollution and abuse of resources, and dimishing an
Response: Comment incomplete.	
Bernath, Anna	Thank you for reading my letter. It is wiser to move forward with clean energy than stick with dirty crude.
Response: Comment acknowledged.	
Bernstein, Beau	Please focus on alternative energy sources. Put time and effort into that not old world fossil fuel.
Response: Comment acknowledged.	
Berntsen, Karen	Isn't Grays Harbor an important stop-off for migrating birds? Isn't it a key area on the Pacific Flyway? Don't put an oil terminal in such an ecologically vital area. Imagine a spill there--it's not worth risking.
Response: Comment acknowledged.	
Berry, Judith M.	Please consider the world your children's, children's children will experience. Do the right thing and stand up to the oil industry.
Response: Comment acknowledged.	
Berry, Suzanne	Definitely against transporting Bakkan crude and toxic tar sands in the U.S. and against the export of oil products over Gray's Harbor. These are dangerous and impractical notions which is why I am against them. Thank you.
Response: Comment acknowledged.	
Berry, Wanda	I urge you to reject the proposed oil terminals near Grays Harbor. The risk to humans and the environment is unacceptable.
Response: Comment acknowledged.	
Berta, Susan	Increased vessel traffic and the increased threat from catastrophic oil spills is NOT worth it!! This expansion will wipe out already endangered salmon and orcas, and the entire ecosystem along with the income from fishing and tourism - stop the madness now
Response: Comment acknowledged.	
Bertholl, Gerald	Its time to stop this senseless practice. If only Reagan hadn't removes D the solar panels from the white house we might not be in this situation.
Response: Comment acknowledged.	
Bertucci, Rosemary	Washington is a beautiful state let's keep it that way. Let's not take a chance with an oil spill.
Response: Comment acknowledged.	
Besig, Jay	Stop sending other people's poison through my home!
Response: Comment acknowledged.	
Bess, Karen	We don't want this for our beautiful state. The earth doesn't need more oil, we need wind and solar.
Response: Comment acknowledged.	
Bessler, Mike	Haven't we learned our lessons yet! With the creosote environmental damage in ex logging and shipping areas, the arcinic in the ground in Tacoma, the mess at the Tacoma water front.
Response: Comment acknowledged.	
Bettge, Joni	Let's pursue more ecologically friendly energy sources and protect our communities from carbon pollution. Please reject the proposed oil terminals.
Response: Comment acknowledged.	
Bettlach, Steve	Thank you for reading my letter. Fossil fuels are not the future. Fossil fuels are the 20th century answer to the energy crisis.
Response: Comment acknowledged.	
Beyer, Drew	Keep our water and oceans "spill free" - oil has done ENOUGH damage already. Just say NO more.

Commenter Name	Comment
Response: Comment acknowledged.	
Beyer, Maureen	Ok. Put your big boy panties on and TAKE A STAND against the oil industry. Please try and save our oceans, environment and all living things that rely on it that are attempting to survive despite human interference and stupity.
Response: Comment acknowledged.	
Beynun, Kathleen	I am against this.
Response: Comment acknowledged.	
Bhattacharji, Lee	We should keep petroleum and gas in the earth and spend our time, money and efforts on making the earth more inhabitable; get to work on sustainable and renewable
Response: Comment acknowledged.	
Bianco, Dina	Please reject the proposed oil terminals. Let us keep our environment safe!
Response: Comment acknowledged.	
Bicknell, Frances	We should not encourage expanded reliance on oil as an energy source.
Response: Comment acknowledged.	
Biestek, Marion	Thank you for reading my letter. Lots of this oil, etc passes through my main stomping grounds here in Hammond, Whiting, East Chicago. I know it's a necessary evil, but spreading it more around our beautiful and bounteous country is a big, bad, risk.
Response: Comment acknowledged.	
Biggs, Patricia	These mile-long oil trains filled with explosive crude oil are a rolling time bomb. How long before an accident happens and Clatskanie or Rainier are obliterated because the trains run right through the middle of these communities. At the very least we
Response: Comment incomplete.	
Bill, Susan	Nor do we want the increased traffic of the trains through our lands. nor the huge freighters carrying oil away. It is not the kind of industry we want to promote.
Response: Comment acknowledged.	
Bindseil, Eric	We must stop building oil infrastructure to STOP polluting our environment and STOP climate change. Start building clean sustainable energy infrastructure! Thank you for reading my letter.
Response: Comment acknowledged.	
Bingham, Shannon	Thank you for taking the time to read my letter.
Response: Comment acknowledged.	
Bini, Katherine	We need to keep oil in the ground, so there should be no need for oil transport.
Response: Comment acknowledged.	
Birch, Rebecca A	Let's protect our oceans and sea life . . . without them, we are nothing! Thanks.
Response: Comment acknowledged.	
Bird, Mike	Seattle has repeatedly asked that highly explosive oil trains not be run 20 yards away from a stadium full of 60,000 people and rail corporations absolutely refuse to do anything about their safety.
Response: Comment acknowledged.	
Birdsong, Pat	Why accept these high risk, dirty , polluting processes to travel through our land, our communities and our natural water resources? MONEY is no longer a good enough reason to justify such long term risk The land and resources that hold America are OUR
Response: Comment acknowledged.	
Birnbaum, Beth	We need to phase out fossil fuels, not increase the damage they've done and are doing.
Response: Comment acknowledged.	

Commenter Name	Comment
Bisbee, Richard	Wherever these dangerous oil tankers go there is great risk for accidents and derailments which translates into destruction of property and very likely death to residents. It's way past the time to move to non-fossil fuel energy.
Response: Comment acknowledged.	
Bischoff, Janet	We can't wait for national help. We the people must demand that fossil fuels stay in the ground.
Response: Comment acknowledged.	
Bishop, Carol	Industrialized human activity has already done way to much damage to the lives of humans, domestic animals, wildlife, and of course the environment. Please put an end to this from hereon in.
Response: Comment acknowledged.	
Bishop, Norman A.	My principal concern is that all this transported oil will be burned, leading to accelerated climate change.
Response: Comment acknowledged.	
Bjorkman, Sandra	Thank you for reading my letter.shipping by puts 'all' in extreme danger!!!
Response:v	
Black, Jake	We need to skip oil completely and move to clean energy renewables.
Response: Comment acknowledged.	
Blackwood, Bridget	The last thing we should be doing is enabling any measures to do with fossil fuels - these companies should be investing in renewable energy sources instead.
Response: Comment acknowledged.	
Blackwood, Jean	Beautiful Washington can do better than this.
Response: Comment acknowledged.	
Blaesi, Brent	Please do not let this project get approved.
Response: Comment acknowledged.	
Blain, Susan	The proposed terminals would be disastrous in many ways. The earth cannot endure increased use of fossil fuels. We need to wean ourselves as quickly as possible from fossil fuels, if we and other species are to have any chance of survival. Listen to sc
Response: Comment incomplete.	
Blair, Heather	This is about national security: safety in transportation and freedom NOT to be polluted. Put the health of our citizens first.
Response: Comment acknowledged.	
Blair, Judith	Thank you for your support and learning from the disasters that have already occurred.
Response: Comment acknowledged.	
Blair, Richard	Enough we are not China. We are AMERICA, China have filled in nearly 65% of lakes, river foe development, can't even breathe in there major cities. Lets not make our country crude by rail with clear risk of of spills etc Please GOD BLESS AMERICA!!!!!
Response: Comment acknowledged.	
Blair, Sue	Clean energy only! Anything that is not healthy for our planet should be stopped immediately!
Response: Comment acknowledged.	
Blake, Pam	We need to keep fossil fuels in the ground, not create more ways to move them around.
Response: Comment acknowledged.	
Blake, Richard	This is SO INCREDIBLY UNNECESSARY at a time of plummeting oil prices, not to mention INCREDIBLY ILL-ADVISED
Response: Comment acknowledged.	
Blakeney, Arvin	We do not need crude oil so we do not need to transport it!
Response: Comment acknowledged.	

Commenter Name	Comment
Blakeney, Penny	This world is at the precipice for major changes in the way we operate here on earth which should mean finding new & advanced ways to power ourselves. It's not like we don't have the technology. What good are new ideas against greed & the unwillingness to
Response: Comment acknowledged.	
Blanck, Heidi	Please ensure the health and safety of the local community members is at the forefront of these types of decisions.
Response: Comment acknowledged.	
Blansett, Rob	Thank you for reading my letter. As you probably are already aware, global warming is a more and more a fact-pf-life with rising air temps along with rising sea level. Even if we could guarantee that this especially dirty 'tar-sand' oil would not leak or
Response: Comment acknowledged.	
Bledsoe, Richard	Supporting the defeat of these oil terminals should be a no brainer.
Response: Comment acknowledged.	
Blodgett, Carol	Thank you for reading my letter. we need to take care of our enviroment now be for it is to late! please don't ignor this or we will have nothing to leave our Grandkids to come.
Response: Comment acknowledged.	
Bloom, Sara	you've stopped keystone, now is the time to further create a legacy you can be proud of. thank you!
Response: Comment acknowledged.	
Blount, Leslie	Do not let the oil companies poison the NW with their greed!
Response: Comment acknowledged.	
Blum, Gina	It really isn't a requirement that we exploit and ravage every square inch of the earth
Response: Comment acknowledged.	
Bode, Renee	Thank you for reading my letter. The big deal about tar sands being job creators is bunk. That we benefit from them is also a lie. We are just the land to pass them through. Once at the refineries near the Gulf Coast the highest bidders get the oil.
Response: Comment acknowledged.	
Bodemar, Jeri	We must leave it in the ground and quickly get to 100% renewable energy.
Response: Comment acknowledged.	
Bodnar, Cecilie	Thank you for reading my letter. The days of rearranging the planet to make us dependent on oil and gas, two very toxic energy sources are over. We now have wind and sun which have, compared to fossil fuels, virtually no side effects. The wind turbines ar
Response: Comment incomplete.	
Bodner, Robert	WE don't want any spills or dangerous chemicals coming into our state!
Response: Comment acknowledged.	
Boehl, Ingrid	Past history has proven that Big Business is careless in handling any hazardous material and do not have the means to clean up the damage caused when things go wrong. Please do not allow them to risk our communities and coastlines.
Response: Comment acknowledged.	
Boelter, Jennifer	Everyday I teach my AP Environmental Students to look for ways to better their environment. Signing this petition is my way of "walking my talk". Please stop transporting. There are alternatives. Thank you.
Response: Comment acknowledged.	
Boeyink, Tracy	It is time to put our long term health as a planet before short term profits and reliance on non-renewable energy.
Response: Comment acknowledged.	
Boghosian, Paula	No shipping of crude oil throuh our country.

Commenter Name	Comment
Response: Comment acknowledged.	
Boise, Gretchen	Do the right thing starting now.
Response: Comment acknowledged.	
Boismier, Siobhan	We need to focus on clean energy & not dirty ones that can harm or communities
Response: Comment acknowledged.	
Boisse, Christine	As a former resident of Washington, I traveled frequently to the Gray's Harbor area. It is such a beautiful place. An oil export terminal there is a BAD idea. The risk to residents and wildlife there is too great to allow this to happen. Please do not pas
Response: Comment incomplete.	
Boland, Donna	Thank you for reading my letter. Fossil fuels are a thing of the past. Let's move forward!
Response: Comment acknowledged.	
Bolduan, Linda	Oil transport is too dangerous. We must leave the oil in the ground and move toward renewables.
Response: Comment acknowledged.	
Bolker, Thomas	Stop prostituting America.Thank you for reading my letter.
Response: Comment acknowledged.	
Bonak, Constancia	Our country has been polluted enough!
Response: Comment acknowledged.	
Bond, Ann	Thank you for reading my letter. Oil is just devastating to the environment when it gets in the wrong place and it is so hard to clean up after an oil spill.
Response: Comment acknowledged.	
Bond, Chris	Oil is the fuel of the past. We are working toward renewable independence. Do not throw Oregon under the dirty wheels of old money and industry. Oregon has been a leader before and can be a leader again. Focus on renewable. Don't open the door to more con
Response: Comment acknowledged.	
Bond, George	Thank you for reading my letter. Oil can pollute and renewable energy is a better option.
Response: Comment acknowledged.	
Bonfoey, Kathleen	To me, this is such a no-brainer. My guess is that this is a stop-gap move while the fossil fuel industry gets the legislative ducks in a row so they can profit from our use of the wind and the sun. We would already be way further down the road to clean
Response: Comment acknowledged.	
Boniello, Kristen	We need to start working together to save our planet instead of destroying it. Think about our future.Thank you for reading my letter.
Response: Comment acknowledged.	
Boone, Andrea	We MUST find other options, and embrace clean energy solutions.
Response: Comment acknowledged.	
Booth, Sandra	We do not want crude oil shipped via rail across the country! All of our rails are not up to grade to take the weight. The oil transport cars are not up to grade. The danger has already been shown to be too high with all the accidents that have already ha
Response: Comment acknowledged.	
Borgquist, Ronald B.	Stop the insanity of fossil fuels!
Response: Comment acknowledged.	
Bortz, Stephen	We have had enough oil spills in the U.S.
Response: Comment acknowledged.	

Commenter Name	Comment
Bose, Joanna	If we want to curb climate change and move toward renewable clean energy, for which country or export division is this even being considered? If it's not good for the U.S. and its citizens, it isn't acceptable and should be stopped!
Response: Comment acknowledged.	
Bosh, Joni	We have to move away from fossil fuels, enabling oils continued use is just stupid. Our efforts should be on developing alternatives.
Response: Comment acknowledged.	
Bosisio, Lucille	We believe there are much better solutions to our energy concerns. We oppose railway transport due to the devastating consequences associated with accidents related thereto!
Response: Comment acknowledged.	
Bosold, Patrick	We're dealing with this issue here in Iowa right now thanks to proposed pipelines that will run through our state and at some point totally trash it. Please be assured that you don't want anything to do with a project like this.
Response: Comment acknowledged.	
Bougher, Thomas	My primary concern is for public safety. Our local firefighters and health care providers lack capacity to respond effectively to an explosion, and fire, involving volatile crude oil proposed to be transported and stored in large volume in close proximity to our homes, and schools. As a Marine Corps veteran of the Vietnam war, I experienced an explosion and fire in Danang, which was quite similar to that experienced in Lac Megantic, Quebec. Because we were involved in aircraft operations, we had crash trucks with foam to extinguish the blaze. What do we have here in Hoquiam? Are we even remotely prepared to meet this risk being imposed upon us by self-serving opportunists? The DEIS really doesn't say, does it?
Response: Comment acknowledged.	
Boulanger, Catherine	Oil transport via tankers and barges put humans and animals at risk, never mind the water.
Response: Comment acknowledged.	
Bourg, Karen	While the letter is a "form" letter I among others have read and agree with the sentiment s. I also live near a coast and for decades have watched life change for the lesser in and around the waters for creatures and humans. We absolutely must stop this..
Response: Comment acknowledged.	
Bousquet, Bob	If this crude oil in transit is, ultimately, for export sales; then it does no good for either the health of this planet & environment, nor for bringing the price down here at home.
Response: Comment acknowledged.	
Bouvier, Kathy	Please consider how comfortable you would be, should your own families reside in these threatened communities. Thank you for reading my letter.
Response: Comment acknowledged.	
Bovaird, Layken	We need to stop destroying and harming our earth, especially for merely greedy purposes. Let's be the light and love! Thank you for reading my letter.
Response: Comment acknowledged.	
Bowers, Debra	These oil transport trains are only benefiting a very few. The Koch brothers and all they stand for! We need to keep them, and the wastelands they create wherever they go, out of WA.
Response: Comment acknowledged.	
Bowers, Kerry	Please do not turn America into a crude oil highway. ake action now to stop two terminals proposed for Grays Harbor, Washington, and protect your community from increased crude oil rail traffic, oil spills and carbon pollution. The proposed oil shipping
Response: Comment acknowledged.	
Bowling, Beth	Thank you for reading my letter. Grays Harbor must be protected....no oil export terminals!
Response: Comment acknowledged.	
Bowman, Nancy	The beauty of our natural environment is a gift. Short-term thinking about the acquisition and transport of oil endangers that gift. Let's plan for a healthy, beautiful, bountiful long term.

Commenter Name	Comment
Response: Comment acknowledged.	
Bowman, Sylvia	Please don't turn our state into another servant of the oil industry's greed. Let our stretch of land and seashore serve health - mental, physical, spiritual.
Response: Comment acknowledged.	
Boyd, Tobias	Oregon needs to be leading the change to renewables, not enabling the fossil-fuel industry to destroy the global climate.
Response: Comment acknowledged.	
Boydston, Lori	KEEP IT IN THE GROUND! 100% renewable, clean energy .....invest. Thank you for reading my letter.
Response: Comment acknowledged.	
Boyles, Kristen	Even with significant flaws and gaps in analysis, the DEISs find truly scary impacts and risks from these proposed projects. It is time for Ecology and Hoquiam to be brave, protect people and the environment, and say "no" to these projects. We don't have to do the oil companies' bidding.
Response: Comment acknowledged.	
Boynton, Joanne	No industry should be allowed to jeopardize the environment and safety of Americans simply for their own profit. Selling tar sands oil to other countries can only create more global warming
Response: Comment acknowledged.	
Bozovich, Rhonda	There are too many extremely dangerous chemical spills from transportation by tanker trucks as it is. We shouldn't compound the issue by adding to it we should find safer more efficient modes of transport for dangerous chemicals & crude as a preventative
Response: Comment acknowledged.	
Brace, Stephen	No one wants to deal nasty oil spills or exploding oil trains. The oil industry is criminally unsafe.
Response: Comment acknowledged.	
Bradley, Cindy	Value the land and the US citizens right to a safe and clean environment over greedy corporate profits. Thank you for reading my letter.
Response: Comment acknowledged.	
Bradley, Cy Nthia	STOP oil trains in WA and TWO proposed terminals in Grays Harbor!!
Response: Comment acknowledged.	
Bradley, Donna	This oil should stay in the ground where it can't do any harm.
Response: Comment acknowledged.	
Bradley, Susan	SHiPPING OIL is dangerous to humans, animals and the earth. The use of OIL is destroying our predictable weather patterns. WE MUST STOP BOTH the shipping by rail NOW!! and the USE of OIL and other FOSSIL FUELS SOON.
Response: Comment acknowledged.	
Bradshaw, John	While it has been taking to long to get us to realize that companies do not want to help you with anything with one exception, they will do anything to get your money and now they even want what the general public pays to the government to help keep them
Response: Comment acknowledged.	
Bradshaw, Larry	Until the price of Bakken Crude dropped the was transported through our local community with out notice and without regard for public safety and environmental integrity. Our priorities are sadly skewed towards profit at any price.
Response: Comment acknowledged.	
Bradsher, Whitney-bear	Citizens of Washington do not want our coastlines turned into crude oil sacrifice zones! We must continue to stand up to big oil and demand protections for our coastal regions. Don't approve the Grays Harbor regions for crude oil zones. Thank you.
Response: Comment acknowledged.	
Branch, William	Time to practice clean energy.

Commenter Name	Comment
Response: Comment acknowledged.	
Brandariz, Anita	we should be out of the fossil fuel business and into clean energy only. that would mean that we should not even be enabling dirty energy corporations by transporting their fuels in order to keep them in business. it must end. we are in the d21
Response: Comment acknowledged.	
Brandenburg, Glen	Stop this dangerous expansion!
Response: Comment acknowledged.	
Brandt, Lark	In these dry times it is irresponsible to ship anything explosive through here. STOP!
Response: Comment acknowledged.	
Branson, B. Ame	Thank you for reading my letter. Thank you for caring and making animal rights and animal welfare a priority in your lives. We have no right to deny animals of their right to live out their natural lives without being abused, tortured, enslaved and rais
Response: Comment incomplete.	
Bratcher, Suzanne	In this time of climate change, we need to focus on finding alternate sources of energy rather than supporting the expansion of oil. These shipping terminals support an energy source we want to phase out. Please reject the two terminals proposed for Grays
Response: Comment acknowledged.	
Brazis, Chris	It is not right we continue to promote oil transport...it also kills us off...
Response: Comment acknowledged.	
Breckenridge, Bonnie	We the People are NOT addicted to oil, we just have no viable choice. We want our representatives to make strong measures to promote and facilitate renewable technologies so we can keep the oil in the ground and stop these dangerous trains and pipelines.
Response: Comment acknowledged.	
Bremner, Ayden	Support cleaner, greener energy sources. Toxic Bakken crude sucks for many reasons and I don't want to see it shipped around, polluting the land, water, & air.
Response: Comment acknowledged.	
Brennan, Patricia	As a coastal New Englander, I know the value of coastal waters and I've also experienced the pressures that deep-pocketed fossil fuel companies put on our communities: "oh, you need the jobs" (which never amount to much); "don't worry about accidents, we
Response: Comment acknowledged.	
Brennan, Walter	Thank you for reading my letter. We need to continue to move away from the use of petroleum products and towards clean renewable sources so that we can leave our planet as good if not better than when we came into it.
Response: Comment acknowledged.	
Brenneman, Don And Marilyn	Thank you for reading our letter. We do NOT want Oil to ruin our country even more than it has already.
Response: Comment acknowledged.	
Bresee, Richard	The oil trains are notoriously dangerous if derailed and hence a tremendous threat to communities along their routes. Marine oil spills are unfortunately to common and especially with crude dangerous to all marine animal and plant life.Stop the debacle be
Response: Comment incomplete.	
Brey, Nick	Thank you for reading my letter. Stop with crude oil already!
Response: Comment acknowledged.	
Breyfogle, Peter	I live too close to the oil trains going through St. Paul for comfort. The recent information on derailments and the damage these oil trains do to the tracks is especially unnerving. Enough is enough!
Response: Comment acknowledged.	

Commenter Name	Comment
Brickler, Tom	Start looking ahead to the ecological needs of our planet. Don't be idiots!
Response: Comment acknowledged.	
Bridgeman, David	No explosive trains in Pacific Northwest. Leave that oil in the ground.
Response: Comment acknowledged.	
Bridy, Joseph	A fossil fuel based energy policy publicly subsidized and violently maintained by and nation or person, after the 1990s, is environmentally, socially and even economically, suicidal.
Response: Comment acknowledged.	
Briggs, Anthony	There have been way to many oil tanker accidents. Not only are these accidents ecological disasters, they are humanitarian disasters as well.
Response: Comment acknowledged.	
Briggs, Terry	Now is the time and Grays Harbor is the place to begin the process to a better way to meet the world's energy needs.
Response: Comment acknowledged.	
Bright, Faye	Please do not allow this transporting of crude oil across our land and coastal waters. It is simply too dangerous for people, animals, and marine life. I am certainly willing to pay more for the gas that I use to avoid this dangerous activity. Thank yo
Response: Comment acknowledged.	
Bright, Fionna	Time to roll back fossil fuel use worldwide and develop sustainable energy solutions immediately.
Response: Comment acknowledged.	
Bright, Larry	Please don't subject your city & state - - and, by extension, US, as well - - to this dangerous, filthy project.
Response: Comment acknowledged.	
Bright, Lori	The oil industry does not care about the people or the environment...just the $$$$'s. Please help the people and the planet.
Response: Comment acknowledged.	
Brink, C. Todd	If canadians will not protect environment then we must save wildlife for our children
Response: Comment acknowledged.	
Brink, Tom	Listen to those who encourage the development of renewable, safe sources of energy. Don't continue exploiting fossil fuels without finding their replacements now.
Response: Comment acknowledged.	
Britton, Jim	Too many accidents already with oil trains. We don't need them in Oregon.
Response: Comment acknowledged.	
Brodsky, Stanley	Until we feel the chance of a spill which would harm the environment is zero, we must not let projects like these proceed. Thank you for reading my letter.
Response: Comment acknowledged.	
Broe, Michelle	Stop putting people at risk- stop these proposed terminals!
Response: Comment acknowledged.	
Broeder, Robert	This is needed
Response: Comment acknowledged.	
Brokaw, Dennis	Say NO to our state aiding and abetting planet pollution, risk to citizen and environment, so a corrupting industry can continue to thwart clean energy while making profit.
Response: Comment acknowledged.	
Bronson, Sue	What does it take? Do we need to go sit on the railroad tracks to make you listen, like we did with regard to shipping nerve gas through down town Portland? I would think that given the fact that there have been numerous "accidents" causing horrible dam

Commenter Name	Comment
Response: Comment incomplete.	
Brooks, Barbara	Thank you for reading my letter. Let's keep out oil here instead of importing oil. How logical is that!
Response: Comment acknowledged.	
Brooks, Dorothy Lynn	Protect people and our planet. We must prevent the risk of environmental damage.
Response: Comment acknowledged.	
Brooks, Ken	why do we need to sell oil to any one other than ourselves anyway
Response: Comment acknowledged.	
Brophy, Michele	Enough is Enough.Thank you for reading my letter.
Response: Comment acknowledged.	
Broughton, Michael	How many more innocent people must die in order to stop these "death trains" from coming through our communities?
Response: Comment acknowledged.	
Brower, Daniel	Extracting more very dirty tar sands oil and shipping it overseas is not the direction we should be headed. We must transition away from burning dirty fossil fuels. The health of our environment, indeed our own iwn well-being depends on it. Thank you.
Response: Comment acknowledged.	
Brown, Alan	Besides, export terminals do nothing to meet the United States's energy needs. Thank you for reading my letter.
Response: Comment acknowledged.	
Brown, Amy	We have to find alternatives and that means that everyone will be affected but the Earth will be better off and give us more time on her precious surface. We take out all of her innards and we end up with a dead shell. Please don't add to this problem by
Response: Comment incomplete.	
Brown, Andrew	If we can't burn it, and the oil is just exported for big profits for oil industry why should be endanger and pollute our environment? It makes no sense, we need to focus on renewable, clean, energies for the future of our decendents! Web Images Videos We
Response: Comment incomplete.	
Brown, Dick	The first, BEST reason NOT to approve even more robust infrastructure for storage and transshipment of oil is that it courts the WRONG future for the climate and well-being of us all. If you will forgive the metaphor, the LAST thing we want to do is pour
Response: Comment incomplete.	
Brown, Erica	Americans want off of crude oil, and fossil fuels for our main source of energy. It's big oil that keeps it alive, and it's cruel to continue for humanity, all animals, and our environment. We need to make the right choices for our world and our futures i
Response: Comment incomplete.	
Brown, Erica	Haven't we killed enough innocents. Be the voice they don't have
Response: Comment acknowledged.	
Brown, Lenora	Start investing in renewable energy that doesn't harm our earth.
Response: Comment acknowledged.	
Brown, Nancy	I want to be able to envision a country that is safe and that has clean air, water and soil.
Response: Comment acknowledged.	
Brown, Stephanie	Grays Harbor is a major stopping point for millions of waterfowl during the migration season. An oil spill there would be catastrophic. It's no place to put an oil terminal.
Response: Comment acknowledged.	

Commenter Name	Comment
Brownlie, Rebecca	We need to move away from fossil fuel, we need to improve failing infrastructure, and we need to make businesses that pollute cover the costs not tax payers.
Response: Comment acknowledged.	
Bruce, Barbara	Enough giveaways to big oil and dirty air! Thank you for reading my letter.
Response: Comment acknowledged.	
Brueberg, Echo	Let's get off Oil,
Response: Comment acknowledged.	
Brumleve, Charles	If you can do this without any oil spills then I can say nothing but I know otherwise!
Response: Comment acknowledged.	
Bruncati, Michael	Squandering the environment for the sake of profits is something that must be stopped and it stops here.
Response: Comment acknowledged.	
Brune, Stuart	Let's spend our time and money on sustainable energy development, rather than burning the same old candle at both ends. I'd like to leave the country in better shape, and ready for my grandchildren to have a great life.
Response: Comment acknowledged.	
Brunelli, Anne	it's got to stop. The future of our planet is literally at stake! Thank you for reading my letter.
Response: Comment acknowledged.	
Brunn, Linda	Thank you for reading my letter. Why do we want to export our oil reserves? We need to conserve and use them within the United States.
Response: Comment acknowledged.	
Bruton, Elsa	Proposed crude oil terminals for Grays Harbor must not go forward. These projects would not only threaten the health and safety of area residents , but would risk serious and irreparable environmental damage. Beyond that, the increment of crude oil would
Response: Comment acknowledged.	
Bryan, M K	Our coastal ecosystem is fragile enough at the moment. This would be a disaster. I've loved our wild coast since I was 9 years old - please don't destroy that experience for others in the future.
Response: Comment acknowledged.	
Bubb, Ken And Donna	We the American people do not want any oil terminals built anywhere in our country. Time now for crude oil to be left in the ground. Time now for clean energy. Time for Congress and the oil industry to understand that the American people are very conce
Response: Comment incomplete.	
Buckley, Maureen	We do not want oil shipping terminals. Is there one in your neighborhood?
Response: Comment acknowledged.	
Bucknam, Alice	Thank you for reading my letter. please stop distroying our homes.
Response: Comment acknowledged.	
Buda, Anthony	Stop this madness.
Response: Comment acknowledged.	
Buelow, Ellen	Please consider the impact on our environment -especially on the shallow water aquifer where these shipping terminals will be placed. Water is a precious resource and risk of a spill too horrible to imagine!
Response: The DEIS addresses potential impacts to groundwater in Section 3.3 *Water* and Section 4.7 *Impacts on Resources*.	
Buhler, Melissa	I am cheered by President Obama's rejection of the Canadian oil pipeline yesterday and am in agreement with his saying that due to its conflict with climate change that it is probably most advantageous that some oil be left in the ground for the future. A

Commenter Name	Comment
Response: Comment acknowledged.	
Bullock, Donna	Will you run it through your neighborhoods? Thank you for reading my letter.
Response: Comment acknowledged.	
Bunch, Juanita	I have family that live and work by the tracks that carry this toxic trash. Leave it in the ground. We need the water, not the gas.
Response: Comment acknowledged.	
Bunney, Marcia	Thank you for reading my letter. I am concerned that oil transport will inevitably lead to spills and other problems our fragile ecosystem cannot tolerate.
Response: Comment acknowledged.	
Buoncora, Yvonne	Let's protect Grays Harbor by not transporting crude oil by train- it's extremely risky and can have disastrous consequences! NOW is the time to develop clean energy alternatives to replace fossil fuels!
Response: Comment acknowledged.	
Bupp, Sherry	Washingtonians love our clean water, clean air, and beautiful natural vistas. We DO NOT love the spills, smoke and explosions that oil trains would bring!! Keep Gray's Harbor clean and beautiful--NO oil shipping terminals on the Washington coast!
Response: Comment acknowledged.	
Burdge, Nancy	Let's break our addiction with oil!
Response: Comment acknowledged.	
Burgen, Julia	We must get weaned off oil. I am an 81 year-old native Texan who has been an active environmentalist since I saw the light in 1970 - that first Earth Day. I had been reading and studying the subject and greatly increased my learning after that. Have b
Response: Comment incomplete.	
Burgeson, Gail	Canada has sea ports, let them deal with the mess!
Response: Comment acknowledged.	
Burleson, Adrienne	Thank you for reading my letter. Please I'm begging you! Do not agree to this accident waiting to happen!!! You know, We all know the devastation caused by Oil Spills, Train/rail oil transport explosions. Stop looking at $$$$$$$$$$$$$$$$$$$$$$$$$$$$$$ and
Response: Comment acknowledged.	
Burnap, Arthur	The fossil fuel industry expects to reap huge profits from their "goods" but expects the public to subsidize and bear the brunt of any "bads" they produce such as environmental damage from spills and global warming from emissions.
Response: Comment acknowledged.	
Burnett, Susan	Please consider the continuous damage to the environment of Grays Harbor and the climate when you consider the oil terminal. What harm will it take to wake people up? I am asthmatic and have seen my condition worsen because of pollution from autos in Puget Sound.
Response: Comment acknowledged.	
Burnham, Brett	The risks far out-weigh the benefits, and the country needs to move forward in transforming our energy system away from fossil fuels. Conversion to clean, sustainable, renewable energy sources should be the priority.
Response: Comment acknowledged.	
Burns, Jill	The oil industry should not be shipping volatile Bakken crude and toxic tar sands from Canada by rail through ANY community...increasing the risk of an oil spill, fire, or explosion and exporting global warming harm.
Response: Comment acknowledged.	
Burns, Kathryn	Thank you for reading my letter. I know that transporting petroleum would have financial benefits for your state, but I doubt they could offset the environmental and safety risks. Please rethink this plan.
Response: Comment acknowledged.	

Commenter Name	Comment
Burridge, Retired Chemical Engineer, John	Thank you for reading my letter. It is ridiculous to expose Washington to these risks when British Columbia has already told its fellow Canadians, "NO"
Response: Comment acknowledged.	
Burstrom, Ruth	I've visited Gray's Harbor, it's low-tide areas are imperative to preserve for migratory birds. Don't just take my word for it, go out during the spring migratory season and see this wonder of nature. It should hopefully convince you not to add any pot
Response: Comment incomplete.	
Burton, Jan Ellen	It is time to stand up for our country's future and children. Money can be the only goal of this shipping proposal. We are not becoming more self-reliant in terms of energy by shipping massive amounts of our reserves abroad. More people can potential b
Response: Comment incomplete.	
Buschagen, Cynthia	It is important to protect the environment from potential hazards such as oil spills.
Response: Comment acknowledged.	
Busvek, Janet	This is very important to stop big oil from raping the country and being big solution contributors so please stop them with your votes.
Response: Comment acknowledged.	
Butle, Francis	As an inhabitant of Santa Barbara, near to a recent oil pipeline break, I lack confidence in the oil industry's claims that it is able to ship oil without danger of spillage.
Response: Comment acknowledged.	
Butler, Eliza	Please stop transporting oil. We need I'll here in the US
Response: Comment acknowledged.	
Butler, Janice	We need to be more forward thinking. Disastrous oil spills have become more and more common. Many have had serious consequences long after the initial spill. It would be irresponsible to allow dangerous oil trains and explosive terminal to intrude upon t
Response: Comment incomplete.	
Butler, Kim	Thank you for reading my letter. Oil tankers are dangerous!!! They are old and outdated. We need to invest in wind, solar and hydro power. There is no future in oil and gas and coal. They are too dangerous and too polluting.
Response: Comment acknowledged.	
Butler, Mark	Thank you for reading my letter. These oil people will stop at nothing and count any cost acceptable. Their profits are all that they feel important.
Response: Comment acknowledged.	
Butz, A	This dangerous & unsustainable transport would literally run right through our neighborhood.
Response: Comment acknowledged.	
Byars, Brian	Please stop the Westway/Imperium Crude-By-Rail DEISs
Response: Comment acknowledged.	
Byrne, Brenda	I object to the oil industry's plans to transport dangerous forms of oil across our country.
Response: Comment acknowledged.	
Cabot, Crystal	When are you criminals going to STOP destroying our planet, and driving species to extinction?
Response: Comment acknowledged.	
Cadiente, Paula	Just one accident would be disastrous.
Response: Comment acknowledged.	
Caesara, Lynda	This is an environmental disaster in the making.I would prefer not to leave this legacy to our children
Response: Comment acknowledged.	

Commenter Name	Comment
Cafarelli, Cenie	At a time of climate change we need to work toward keeping fossil fuels in the ground, before we leave a very imparted planet to our children. Increasing infrastructure only promotes fossil fuel extraction.
Response: Comment acknowledged.	
Cain, Barbara	You need to take heed! We do not want to take any measures to expand the dangerous practice of shipping crude oil through cities and towns!
Response: Comment acknowledged.	
Calabrese, John	The risk/reward ratio for these oil terminals favors profit over the health of people and their communities. The potential for spills via rail and in the waters are statistically relevant. Please consider the people and habitats in these areas more than t
Response: Comment incomplete.	
Calderon, Jerrie	I would like to leave this world a better place for my children, grandchild and great grand children! Stop destroying our earth!
Response: Comment acknowledged.	
Calderon, Linda	It seems we are either wrecking our environment for future generations or we are putting present ones in danger by our practices. Please stop this horrid idea. There have already been problems with explosions.
Response: Comment acknowledged.	
Caldwell, Dotty	The transport of oil also increases climate change by continuing the reliance on fossil fuel rather than encouraging receiving areas to develop local, renewable, safe energy sources.
Response: Comment acknowledged.	
Calendine, Georgeann	We have to move to clean energy. The time is now.
Response: Comment acknowledged.	
Callahan, Anne	Please dedicate policy-making efforts to CHANGING the existing outdated energy system and REDUCING the huge environmental risks of oil extraction and transport that affect people's health and the quality of our living environments, instead of ENABLING thi
Response: Comment acknowledged.	
Callahan, Gloria	Our Earth cannot stand anymore sources of pollution and damage. The more of the Earth that is destroyed by oil contamination, the less it is able to support life. Please do not allow Grays harbor to become a dumping ground for oil transport.
Response: Comment acknowledged.	
Callinan, Elaine	Leave the oil in the ground. Move to non toxic solutions to our energy needs!
Response: Comment acknowledged.	
Campbell, Benita	We must transition away from dirty extreme energy extraction by not adding to dirty fossil fuel infrastructure.
Response: Comment acknowledged.	
Campbell, Colleen	Our focus needs to be on protecting our environment. The oil industry has clearly shown that their only concern is about their bottom line. We cannot afford to continue assaulting the earth without expecting serious repercussions.
Response: Comment acknowledged.	
Campbell, F Debbie	If we don't need the oil, keep it in the ground! Even when we get to the point where all of our energy needs are provided by renewable sources, there will be things that we need oil for. Keep it in the ground until we need it. If petroleum companies won't
Response: Comment acknowledged.	
Campbell, Lacy	I live in Portland but enjoy the Olympic Peninsula and don't want oil shipping terminals and the potential disaster they bring with them.
Response: Comment acknowledged.	

Commenter Name	Comment
Canarsky, Maurine	Let's encourage clean, sustainable energy sources and take a step to phase out these fossil fuels.
Response: Comment acknowledged.	
Cancilla, Debra	Please protect what cannot be replaced - Stop the Oil companies!
Response: Comment acknowledged.	
Canela, Abigail	There are other alternative energy sources that are not dirty and hazardous like crude oil. It will be cool and clean to obtain power from such energy sources.
Response: Comment acknowledged.	
Canny, Maureen	Please protect our environment. Do not allow two new oil terminals to be built in Grays Harbor, WA
Response: Comment acknowledged.	
Canonica, Charlene	We have a beautiful coastline and northwest is clean. Accept these terminals and you are just helping the 1% corporations and billionaires and trampling the 99% that deserve this lovely area.
Response: Comment acknowledged.	
Cantrell, Justine	This is not the direction we want to go here in Washington. The risks are unacceptable and we do not want to have you expand any of your operations. We are looking for the development of cleaner and more efficient energy sources. Your dirty and dangerous ways of making a buck are not welcome on our coast!
Response: Comment acknowledged.	
Canutt, Sheryl	There is far too much pollution in the oceans and the air. Every aspect of our actions regarding the destruction of land, sea and air need to be scrutinized for a very long time before we make more decisions and more mistakes. Thank you for reading m
Response: Comment acknowledged.	
Cape, Lawrence	Thank you for reading my letter. We all need to protect our environment. it's the only one we have.
Response: Comment acknowledged.	
Capperis, Paulette	Stop the dangerous expansion of oil transport on rail and oceans
Response: Comment acknowledged.	
Cappuccio, Frank	How about nuclear power instead of dirty fossil fuels?
Response: Comment acknowledged.	
Caputo, Julie	Please protect Grays Harbor from becoming another potential hazardous oil spill location. We have already lost so much of our oceans to pollution, drilling, and waste, we need to take every step to preserve and protect what is left for the climate, for Washington and for all of us. Let's be leaders and stop this action becuase with every action that would allow any industry or oil, or mining or logging, or even study/ research there, we are giving away too much of our resources that are already adversely affected by climate change and our actions. Plesae stop, preserve Grays Harbor! Thank you.
Response: Comment acknowledged.	
Carbary, Lawrence	Stop the transport of polluting oil through the west coast states.
Response: Comment acknowledged.	
Carella, Philip	Not in our back yard!
Response: Comment acknowledged.	
Carl, Juanita	Crude oil, especially tar sands or other volarile crudes, ia NOT something that ewe need ro be shipping either around o or out of this country. It is both toxic and explosive and should remain safely in the ground where it is.
Response: Comment acknowledged.	

Commenter Name	Comment
Carlos, Jessica	Just stop destroying earth. Haven't you already watched the move WALL-E? We're gonna get fat and live in a space ship and earth is going to be a really disgusting place to live
Response: Comment acknowledged.	
Carlson, Joel	Global warming fossil fuels must stay in the ground so we don't destroy life on earth in our current sixth great mass extinction. Almost all life on earth disappeared in previous mass extinctions. We must very quickly switch to renewable energy including solar. Electric vehicles keep costing less while going farther on a charge so fossil fuel vehicles must be eliminated. Wood construction including large multi-story projects sequesters a lot of carbon. Many trees must be planted. Now is the time for action!
Response: Comment acknowledged.	
Carlson, Matthew	Thank you for reading my letter. I sincerely hope you will agree, and reject the terminals.
Response: Comment acknowledged.	
Carlson, Nancie	I live dangerously close to the train that goes through Oregon. Can it be guaranteed that these oil trains are safe?
Response: Comment acknowledged.	
Carlson, Pat	We already know that pipelines leak, trains explode, tankers spill. Energy companies should be working toward a cleaner future, not expanding 19th century technologies!
Response: Comment acknowledged.	
Carlson, Terry	When I think of home I think of Grays Harbor: Aberdeen and Hoquiam. The ecological risk is too great and the returns infinitesimal. Those who would benefit would have no risk.
Response: Comment acknowledged.	
Carlson, W H	If a railroad transports oil in the USA, it must be in safe containers, on safe rail beds, with disaster plans and details for all agencies. Any railroad that states that cannot meet safety standards, must not be allowed to ship on unsafe rail beds, unsaf
Response: Comment acknowledged.	
Carmean, Roxann	Sustainable, clean, green energy gets my support, not dangerous, dirty energy from the oil industry.
Response: Comment acknowledged.	
Carmody, Phil	This is backward-looking policy. The future belongs to cleaner energy sources. Cleaner energy is also safer. Do you really want to increase the chance of another Lac-MΘgantic disaster, closer to home?
Response: Comment acknowledged.	
Carnahan, Florence	Thank you for reading my letter. These trains pass by houses like the one my niece and her husband and little ones live in. The kids love to watch the trains. But oh how dangerous those trains are. This not speculation - it is fact. There have already bee
Response: Comment acknowledged.	
Carnell, George	This is another mandate from the people!! YOU WILL BE HELD RESPONSIBLE!
Response: Comment acknowledged.	
Carney, Joseph	There is enough oil production & distribution infrastructure in this country to meet our needs. Stop the Gray's Harbor project.
Response: Comment acknowledged.	
Carpenter, Sue	It is imperative that climate change be considered in this decision. We need to be looking for alternatives to oil - not more ways to pollute with it.
Response: Comment acknowledged.	
Carpio, Stephanie	I live in Virginia and already know traffic is the worst so all this added truck traffic woyld make getting anywhere impossible plus add to pollution from the idle cars.
Response: Comment acknowledged.	

Commenter Name	Comment
Carpita, Dan	I just had a new great-grandson born this AM and I was thinking about what this Planet will look like when he is my age. It will be almost a new century and according to science if we do not stop the insanity of allow money to be our concience there will no longer be sustainable life on this Planet. Please leave a legacy of life for him by telling those without concern for anything but their bottomline not this time, not here, NO MORE!
Response: Comment acknowledged.	
Carragher, Daniel	I don't want to see my home state be the next to suffer a oil spill. And watch as the oil companies pass the blame for it to everyone but themselves.
Response: Comment acknowledged.	
Carrell, Ellen	Your and my grandchildren, their children, and so on, deserve a better legacy
Response: Comment acknowledged.	
Carroll, Diana	I support Washington State's efforts to reduce fossil fuel use, move to more renewable energy. and thus the need for more oil terminals.
Response: Comment acknowledged.	
Carrubba, Sandra	Rail cars leak or derail. Tanker trucks have accidents, spewing their contents. We must stop these dangerous railcars and trucks and barges from endangering us all. It is time to invest in renewables and leave the old ways of fossil fuels behind.
Response: Comment acknowledged.	
Carson, Judith	Thank you for reading my letter. We've got to start caring for the earth. If we bow down to money all the time, ultimately it won't matter because all our vital resources will be gone, and we'll be dead.
Response: Comment acknowledged.	
Carta, Diane	Please hear earth's cry for mercy .
Response: Comment acknowledged.	
Casart, Paul	To a lot of people, living in a world awash with "cheap " fossil fuels seems pretty rosy. Not so! Even if the result of continually rising CO2 levels were not set to devistate our climate, the immediate unhealthy effects are too glaring to ignore!
Response: Comment acknowledged.	
Cascio, Lynn	Thank you for considering something besides short-term corporate profits.
Response: Comment acknowledged.	
Caskey, MI	It is well known that it is not a simple matter to make the transition from environmentally destructive to environmentally safer methods of obtaining energy. Yet the technology is available and there is every reason to move forward rather than backwards
Response: Comment acknowledged.	
Casper, Chris	Oil era is over! We must move on & these oil pipelines are the wrong direction. They are sure to be dangerous, destroy valuable natural environments, steal people's property & the end product is harmful to us all, every living thing on this planet. Thank
Response: Comment acknowledged.	
Cassel, Debra	put the money into clean energy so we don't need oil
Response: Comment acknowledged.	
Cassens, Susan	This negatively affects our local economies which is the backbone of our country.
Response: Comment acknowledged.	
Cassidy, Cristina	I hope we can all come together for this cause to make a difference
Response: Comment acknowledged.	
Cassidy, Mary Ann	Very Important!! Thank you for reading my letter.
Response: Comment acknowledged.	

Commenter Name	Comment
Castronovo, Catherine	Reject the two oil terminals proposed for Grays Harbor, Washington. Oil is explosive. Any spill or accident can cause major destruction by fire as well as by oil itself to the environment and to those living there, human or other species. Further the thri
Response: Comment incomplete.	
Caswell, Susan	The environmental damage isn't worth it. NO NO NO!
Response: Comment acknowledged.	
Catalanotto, Darren	NOOOOOOOO!!!!!!!!!!!!!!!!!!!!!!!!!!!!!! IF YOU WON'T SPEND THE MONEY TO FIX YOUR INFRASTRUCTURE AND INVEST IN NEW, SAFER TANKERS, WHY SHOULD WE BELIEVE YOU'RE GONNA SHOW CONCERN FOR THE SAFETY OF ANYONE ANYWHERE?? YOU RICH, CAPITALIST BASTARDS ARE GREEDY A
Response: Comment acknowledged.	
Cate, Deborah	It is unacceptable that Grays Harbor should shoulder this burden while someone else reaps all the profit.
Response: Comment acknowledged.	
Caudill, Larry T	Exporting oil is a BAD idea! We will need that oil right here in the US someday.reducing the domestic supply will increase the price of gasoline NOT lower it per the rule of supply and demand : less oil and higher prices Thank you for reading my letter.
Response: Comment acknowledged.	
Causey, Linda	Do what's right for the environment and the future, not for degradation and money!
Response: Comment acknowledged.	
Cawley, Valerie	consider the impact of our roads and infrastructure and please our fragile ecology ...
Response: Comment acknowledged.	
Cawthra, William	The potential risks are greater than the public should have to face. The only winner here is the oil industry. Leave it in the ground.
Response: Comment acknowledged.	
Cederquist, Suzanne	Start solar expansion! It's a no brainer!!
Response: Comment acknowledged.	
Cedillos, Marnie	The oil industry cannot be trusted to protect our environment! You must act to protect it! You can make a positive difference by stopping these harmful projects!
Response: Comment acknowledged.	
Centeno, Pamela	Wake up greedy oil! All petroleum products are contaminating our environment, your environment and your lineages environment. You will be held accountable for the plunder of our pristine state Buy your reckless, greedy actions today. Is this how yo
Response: Comment incomplete.	
Centoni, Marilyn	We must use SOLAR AND WIND POWER and STOP BIG OIL. OIL POLLUTES THE GROUND, AIR, AND WATER AND BIG OIL CAN'T STOP IT. There are many oil spills that have killed off birds, fish and other animals with these oil spills.....NO ONE CAN STOP ACCIDENTS...
Response: Comment acknowledged.	
Ceselli, Marlena	WHEN REALIZED> 'GREED' WILL BE THE 'WORLD'S DEMISE' ...AND HOW much MORE can the EARTH HANDLE ALL BOIL'S DOWN 2 GREED
Response: Comment acknowledged.	
Chadwick, Patricia	Thank you for reading my letter. PLEASE DON't add to the trashing of our beautiful country! We need to put our energies and resorces into alternative fuels...not oil!
Response: Comment acknowledged.	
Chamberlin, Linda	There are viable options for clean, free energy, which are starting to leak out to the public. We've been grassy lied to, and are not very pleased. Time for those in power to come clean, ahead of this inevitable wave of truth, And it is inevitable.
Response: Comment acknowledged.	

Commenter Name	Comment
Chamberlin, Ruth	Have these oil companies mo moral compass? These oil trains are a danger to thousands of people, since they do not want to make the cars safe or stop the pollution that will kill life. What a selfish, greedy mess!
Response: Comment acknowledged.	
Chambers, Randall	We need wind mills and solar panels and nuclear fusion.
Response: Comment acknowledged.	
Chandler, David B.	The tar sands and Bakken oil should be left in the ground, along with most of the rest of proven reserves of fossil fuels. The Earth and the oceans cannot stand the added carbon dioxide.
Response: Comment acknowledged.	
Chang, Nancy	Let us all live with each other in a safe and clean environment, without this pollution from dangerous actions by companies only concerned with their own bottom lines. Thank you for reading my letter.
Response: Comment acknowledged.	
Chanler, Alexander	Thank you for reading my letter. Think Renewables.
Response: Comment acknowledged.	
Charette, Tanya	Our marine water habitat can not withstand additional threats to the health of the water system. It is time big business works to preserve and contribute to the health of our planet, as opposed to continuing to destroy it for money!
Response: Comment acknowledged.	
Charlton, James And Lygia	Profits before health, environment and ecology. Of course. We all understand. You get the cake and we get the slops. What else is new?
Response: Comment acknowledged.	
Chase, Brenda	Don't let these companies do in Washington what BP did here in Louisiana. Once a spill happens there is NO REAL MEANS OF CLEANING IT UP! Our dolphins are dying, our seafood is poisoned, and our way of life is changed forever. Thank you for reading my lett
Response: Comment acknowledged.	
Chase, Jayni	Thank you for reading my letter. It's time to put our focus and resources into renewable energy. No more delaying!
Response: Comment acknowledged.	
Chati, Janet	Fossil fuels'mro need to go the way of the dinosaur. We need more renewable sources.
Response: Comment acknowledged.	
Chatterji, Manjari	Please recognize the dangers of oil spills, and abandon a model of energy production that hurts people and the environment.
Response: Comment acknowledged.	
Check, Pamela	We need alternatives to fossil fuels, not further support for dirty energy.
Response: Comment acknowledged.	
Cheers, Jennifer	Seriously, stop it with the crude oil transport.
Response: Comment acknowledged.	
Chen, Eric	The American people and the environment should not be put at risk to fill the pockets of oil businesses. An oil spill or accident is too dangerous to be risked!
Response: Comment acknowledged.	
Cherry, James	With the deregulation of rail transport by oil companies have made trains become rolling bombs, where they go off random. We've also recently experienced a rash of oil spills in rivers. It's time to re-regulate oil industries and protect the environment a
Response: Comment incomplete.	

Commenter Name	Comment
Cherveny, Michael	Why can't we power past oil? Let's leave this world a better place for our future generation instead of a worst world. Wake up you morons! Your dreaming!
Response: Comment acknowledged.	
Chesterman, Susan H	Thank you for reading my letter. We know the path we have to take to repair our earth's natural rhythms. We have only to stand up to the fossil fuel industry. You have the power to make this happen.
Response: Comment acknowledged.	
Chiang, Laura	Thank you for reading my letter. Please also consider the costs and losses associated with the horrendous fire season this past summer. Climate change will make fire seasons like 2015 more common and oil exports will only add to global warming.
Response: Comment acknowledged.	
Chick, Greg	Dirty fuel is dirty when spilled, or used.
Response: Comment acknowledged.	
Chickowsky, Caroll	Just now, Obama rejects Keystone KL pipeline. What Canada did to their 'own' land to produce this crude is horrendous. Now they want to bring this crude to Washington State. Thank goodness the citizens of Canada turn out their prime minister for a mor
Response: Comment incomplete.	
Chilcoat, Rose	It is time to turn the tide away from the fossil fuel industry and especially for projects that would ship our resources overseas. Let's transition to our future now and stop putting our communities and the Earth at risk.
Response: Comment acknowledged.	
Childs, Susan	I see the oil industry is counting on all to bow to their fiefdom once again. Or should I say, thiefdom? Please don't let them rob you of your region's integrity and independence. You have the power to stand up for your land and your community.
Response: Comment acknowledged.	
Chiles, Stephen	We don't need more toxic accidents and we don't need to export low grade crude oil to further more negative effects on climate change.
Response: Comment acknowledged.	
Ching, Mary	Please explain to me why any more oil or coal should be extracted and transported to any shipping terminals? Carbon-based fuel is putting our world at risk, and for what? The profits that will go to a few people in one filthy industry. That oil should be
Response: Comment incomplete.	
Chiodo, Beth	I'm opposed to oil companies building shipping terminals in grays harbor washington and the oil trains that feed them
Response: Comment acknowledged. Comment acknowledged.	
Chischilly, Jane	You have the power, but not the right to send BOMB TRAINS THROUGH OUR HOMES.
Response: Comment acknowledged.	
Chopak, William	Thank you for reading my letter. We need desperately to replace fossil fuels, nuclear energy and war machines as the largest part of our economy with environmentally sustainable energy (ESE) and USA made products using ESE. Also, we shouldn't export oil u
Response: Comment incomplete.	
Chott, John	Thank you for reading my letter. I live near the Kootenai River and rail corridor to the northwest coast and I shudder to think what a tragic mess an oil spill would make into one of our last great rivers.
Response: Comment acknowledged.	
Chraft, Ken & Andrea	We the people are not willing to support what ever the Oil Industry wants for itself. The oil industry will listen to the people, and learn to move forward responsibility.
Response: Comment acknowledged.	

Commenter Name	Comment
Christenson, Susan	PLEASE do not do this. The trend is towards renewable energy. Switch to this new idea, make more money, and be a leader instead of a hated industry!!!
Response: Comment acknowledged.	
Christian, Karen	END our dependence on oil.
Response: Comment acknowledged.	
Christine, Elizabeth	These risks in transporting crude oil is NOT the present we want. Allow your business to open in the direction of evolutionary services!
Response: Comment acknowledged.	
Christy-boyden, Carolyn	THINK about what you are doing and the far-flung harm it will cause if any accident happens. Stop it now!!!
Response: Comment acknowledged.	
Cicchi, Carla	No building of more oil shipping terminals on Washington's coast turning the region into a filthy oil thoroughfare for crude oil transportation by rail and oil tankers. It's been proven many times that shipping crude oil is lethal to our waters, sea life,
Response: Comment acknowledged.	
Ciliberti, Molly	Our waters support a magnificent panoply of life. We need to stop using oil. Yes, I drive... A hybrid :)
Response: Comment acknowledged.	
Cilione Vet & Teapartypatriot, Bruno F.	Too often, train oil-transport proves Dangerous.
Response: Comment acknowledged.	
Ciske, Daniel	I applaud the preservation of tidal flats for shorebirds and enjoy visiting Grays Harbor for the shorebird festival. Please protect this cital area and you community.
Response: Comment acknowledged.	
Cisneros, Bert	Stop the dangerous expansion of oil transport!
Response: Comment acknowledged.	
Clabaugh, Vicki	STOP SENDING CRUDE OIL ACROSS WASHINGTON STATE!
Response: Comment acknowledged.	
Clagett, Barb	The dangers to human life and the rest of the environment are so apparent that there really is no justification for this project!
Response: Comment acknowledged.	
Claiborne, Gay	Stop the madness.
Response: Comment acknowledged.	
Claman, Elizabeth	It would be crazy to let greed triumph over people's well being and the health of the environment. There's no way to make any part of this proposal safe, to fully guarantee the protection of communities from disastrous spills or explosions. Please do not
Response: Comment acknowledged.	
Clark, Ashley	Many families would most likely be destroyed if any mi s take was made during a transportation. I completely agree that the transportation of oil through our communities would Definitely be hazardous to our communities & our health!
Response: Comment acknowledged.	
Clark, Beverly	This is not the future we want!
Response: Comment acknowledged.	
Clark, Catherine	Oil trains are mobile bombs!
Response: Comment acknowledged.	

Commenter Name	Comment
Clark, David & Susan	There is a booming market for oil but greed should not be the only consideration in the selection of Grays Harbor as a huge oil terminal. Thank you for reading our letter.
Response: Comment acknowledged.	
Clark, Diane	I have been to Grays Harbor, Washington, and it would be tragic to have oil export terminals there. Furthermore, I do not trust the safety of the petroleum industry considering the history of oil spills they've had. Thank you for reading my letter.
Response: Comment acknowledged.	
Clark, Jamie	We should focus on renewable energy. Thank you for reading my letter.
Response: Comment acknowledged.	
Clark, Joyce	Please protect our environment for us and future generations by saying NO to oil expansion by train and boat. My grandchildren and children deserve the clean environment I grew up in!
Response: Comment acknowledged.	
Clark, Kevin	The proposed oil shipping terminals; the dangerous oil trains needed to feed them and the continual parade of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of communities, the local economies, tribal culture, and our ocean and coastlines at risk.
Response: Comment acknowledged.	
Clark, Marcia	Derail transporting dangerous substances through our country and cities! Further more don't risk our country's coastlines and natural habitats for $$$$$!
Response: Comment acknowledged.	
Clarke, Gerald	We do not need this dirty oil. The dangers of overland shipping are too great to risk the lives of our citizens and environment.
Response: Comment acknowledged.	
Clarke, Karen	Keep it out of SC!
Response: Comment acknowledged.	
Clarke, Laura	Climate change demands renewable energy like wind and solar!!!! Stop environmental damage caused by the oil industry.
Response: Comment acknowledged.	
Clayman, Harry	This issue is a no-brainier We live on the same planet, but continue too destroy our home with absolutely no regard for all persons who bleed when injured. Corporations can steal billions but just pay a fine. This person does not bleed, this person has
Response: Comment acknowledged.	
Clayton, Luanne	If you stand near the tracks when a long oil tanker train rumbles by you can't help but thinking, "What would happen to this community if there was an accident?" It is mind numbing. These are your neighbors. Thank you for reading my letter.
Response: Comment acknowledged.	
Clayton, Ronald	Don't allow the greedy oil industry to destroy the beautiful, irreplaceable environment of Washington State just to increase their vulgar profits.
Response: Comment acknowledged.	
Cleary, Janice	Are any of you people paying attention? We have a history of disaster here involving this issue. Simply stop it NOW Thank you
Response: Comment acknowledged.	
Cleghorn, James	We have the bomb trains coming through our area. My fiancee in Sewickley, PA is in the blast zone from trains that pass nearby. This form of oil transport needs to stop.
Response: Comment acknowledged.	
Clem, Kath	Do what you know is right for the USA. Protect us, that's why the people voted for you. Thank you.
Response: Comment acknowledged.	
Clemens, Peter	It's time we seriously and responsibly downgrade our dependency on the fossil fuel paradigm, to jumpstart our economy and protect the only future home we have for our children.

Commenter Name	Comment
Response: Comment acknowledged.	
Clements, Rhonda	We do not need this dirty dangerous oil to be crossing our beautiful state and risking lives and endangering our land our wildlife and our people, along with our ocean!!!
Response: Comment acknowledged.	
Cline, Andi	Thank you for reading my letter. We must limit and ultimately banish crude oil traffic. America is not a thoroughfare for crude oil transportation and its trail of oil spills and carbon pollution. American citizens are demanding justice for our planet and
Response: Comment incomplete.	
Cline, Rev. L.	Thank you for reading my letter. We are the stewards of the earth.
Response: Comment acknowledged.	
Close, Patricia	please don't accelerate further the destruction and devastation of our small fragile planet by increasing oil transport/spills by building terminals
Response: Comment acknowledged.	
Clower, Elizabeth	Stop The Dangerous Expansion Of Oil Transport In Your State! Thanks, Elizabeth Clower
Response: Comment acknowledged.	
Cochran, Greg	Thank you for reading my letter. Contrary to this petition the U.S. needs to do away with OPEC Oil and make our oil here in the U.S. we have so much oil resource in our own background and our corrupt government refuses to use those resources.
Response: Comment acknowledged.	
Cochrane, Julia	Please preserve the wonderful natural resources of Grays Harbor, and honor the wishes of the original inhabitants, and follow the science by encouraging the corporations to leave fossil fuels in the ground.
Response: Comment acknowledged.	
Cocks, Verna Bloom	No more Oil Trains!!!! Transporting Oil in any way must be stopped!! All fossil Fuels should remain in the ground, where they are not a danger in any way!!! Climate Change is with us in spades!! Save our planet by keeping Fossil Fuels in the ground!
Response: Comment acknowledged.	
Coddington, Carol	I think there are many environmental issues that need to be handled by the union of the states of America. Thank you for reading my letter.
Response: Comment acknowledged.	
Coffey, Richard	We need more renewable energy sources not more dirty oil killing our environment.
Response: Comment acknowledged.	
Coffin, Douglas	It's time big money is put out of business and keep the dirty oil transporting out of NY State
Response: Comment acknowledged.	
Cohan, Mark	Let's end oil reliance and find more alternative clean energy alternatives!
Response: Comment acknowledged.	
Cohen, Isabel	Please end oil transports devastating our lands and waters.
Response: Comment acknowledged.	
Cohn, Marcus	Our nation needs to turn away from reliance on fossil fuels - building terminals at Grays Harbor is wrong for the locale, the USA and the planet.
Response: Comment acknowledged.	
Coladonato, Janette	Thank you for reading my letter. Please put your greed aside and start to help heal the ONLY Earth we will ever have. Life will continue so let your good actions be your memorial to humanity. Please!
Response: Comment acknowledged.	
Colburn, Sean	A few people I know, with very private and natural yards, will have other NG pipelines installed in view of their house, and be in the considered "death zone" and be guaranteed to die if the pipeline ever explodes there. I sign for people about to lose th

Commenter Name	Comment
Response: Comment incomplete.	
Colburn, Shar	stop shipping oil. be apart of the solution.
Response: Comment acknowledged.	
Cole, Cal	Thank you for reading my letter. Save the planet!!!
Response: Comment acknowledged.	
Cole, Gloria	I live near Alabama's Gulf Coast. We are still struggling to clean up the mess. No. No. No. No more oil spills, ever.
Response: Comment acknowledged.	
Cole, Karen	This is another way to pollute our waters, land the air we breathe and the animals that share our earth. People abuse animals our earth and people, why is this contining????
Response: Comment acknowledged.	
Cole, Michelle	Please do all you can to prevent future tragedies.
Response: Comment acknowledged.	
Cole, Penelope	Dirty oil or dirty coal -- both need to be dumped in favor of solar and electric.
Response: Comment acknowledged.	
Coleman, Lissa	We must defend the entire West coast from the extreme danger of pollution, spills, derailment or possible train derailments causing volatile explosions. The costs of catastrophic damage zero out any economic gain of promised jobs.
Response: Comment acknowledged.	
Coll, Karen	The risks don't outweigh the benefits, which are none. Do not build these oil transports.
Response: Comment acknowledged.	
Collingwood, Kelly	We should be using clean renewable sources of energy...we should be using zero-point energy...free the people, save the planet
Response: Comment acknowledged.	
Collins, Carol	how many people have to be injured or die from the transport of an antiquated and unsustainable power source before we realize there are safer and more sustainable energy sources available. Nukes and oil will go down in history (if there is a history lef
Response: Comment incomplete.	
Collins, Dana	This shipping of oil only benefits a handful of already wealthy corporations, and does untold damage to us all. Please oppose it! Thank you for reading my letter.
Response: Comment acknowledged.	
Collins, Gail	Fossil fuels have got to go and we need to fast forward on renewables now or else we're going to fry planet Earth. there is no planet B. Gail Collins
Response: Comment acknowledged.	
Collins, Kathleen	We have been trying to get away from fossil fuels because we need to at least slow climate change. Yet, these shipping terminals are guaranteed to increase the digging and drilling that we need to stop to lower our carbon footpirnt, sends fossil fuels to
Response: Comment incomplete.	
Collins, Matthew	Don't let this terminal be built. The danger to our oceans, our life's and to sea life is to great.
Response: Comment acknowledged.	
Colner, Daria	Our country and region should be spending time and money developing non-fossil fuel energy options, not expanding oil use.
Response: Comment acknowledged.	
Columbus, Loula	Too much of our land is being sacrificed. Enough is enough.
Response: Comment acknowledged.	

Commenter Name	Comment
Colvin, Bill	I have been to Grays Harbor, and camped on its beaches. It is a wonderful place. Shipping oil through Grays Harbor would be a huge tarnishing mark on the area, marring both the natural and cultural beauty. I live in Spokane, where potentially explosive oil trains rumble through downtown every day. Becoming a fossil fuel transportation hub seems like one of the last things Grays Harbor, or any other place, needs. Further, you must look to the future when deciding what to invest in. The future is not in fossil fuels. In fact, if we, as a species, do not faze out of fossil fuels completely by mid-century, the future will be barely tolerable. And the coast of Grays Harbor -- both beaches and sea level towns -- will be under water. So do not invest in fossil fuels. Do not invest in self harm.
Response: Comment acknowledged.	
Combes, Joan	Protecting Grays Harbor from the knd of damage that has already been experienced elsewhere is a priority. Please act now to prevent catastrophe to the sensitive environment and local economy by helping to eliminate dependence on fossil fuels forever. One
Response: Comment acknowledged.	
Comella, John	We should leave fossil fuels, especially crude oil, in the ground as much as possible. Oil transport is very dangerous with many derailments and leakage.
Response: Comment acknowledged.	
Commons, T Mark	If Sweden can announce its intention to get completely off of fossil fuels, then why can't we be as good as them?
Response: Comment acknowledged.	
Comparetta, Christopher	Lets begin the move to less harmful energy sources by moving away from fossil fuels and their associated threats to the health of our environment.
Response: Comment acknowledged.	
Comstock, Sabrina	Oil is too dangerous to us and to our environment. We need to focus on new cleaner energy and not be expanding our old dirty dangerous and corrupted ways.
Response: Comment acknowledged.	
Condit, Stephen	We need to move away from fossil fuels, not encourage their use and export if we want a healthy environment filled with natural beauty for our grandchildren!
Response: Comment acknowledged.	
Conifer, Colleen	Please consider the people living in affected areas. No amount of economic benefit is worth their health and safety, and these trains are a disaster waiting to happen.
Response: Comment acknowledged.	
Conklin, Jack	Thank you for reading my letter. AMERICA NEEDS TO CHANGE TO RE-NEW-ABLE POWER; WIND, WATER, SOLAR....
Response: Comment acknowledged.	
Conley, Loran	It makes n long term sense to endanger millions of local folk for the benefit of BIg Oil Money, just selling to countries that we are near in a Cold War with.
Response: Comment acknowledged.	
Conn Ii, Ronald D	For your families and mine!
Response: Comment acknowledged.	
Conn, Patrick	Here we go again. STOP THIS OIL INDUSTRY INVASION OF OUR REGION, OUR PERSONAL AND ENVIRONMENTAL SAFETY, AND OUR PEACE OF MIND BEFORE ALLOWING ANY OIL-RELATED TRANSPORTATION IN THIS REGION.
Response: Comment acknowledged.	
Connelly, Lillian	Please do not put this beautiful area in peril!
Response: Comment acknowledged.	
Connor, Eileen	I am against these oil export terminals. They would be dangerous and devastating to the quality of life on our planet and that beautiful part of coastal life of WA. We need renewable sources of energy not dirty oil and dangerous practices, Please reject

Commenter Name	Comment
Response: Comment acknowledged.	
Conrad, Geraldine	I'm pretty much without hope because governments all over the world are caving into corporate marauders. But we have to try.
Response: Comment acknowledged.	
Conrad, Len	Give 'em Hell
Response: Comment acknowledged.	
Constantino, Patricia	We have to care for the health of our planet and our children.
Response: Comment acknowledged.	
Contessa, Nidhi	I support the protection of Grays Harbor and its people. I urge you to reject the proposed oil terminals.
Response: Comment acknowledged.	
Converse, Howard	We have passed the point of "just another nail in the coffin of clean environment". These are now steps that amount to the finishing cement bond to seal our fate. It is time to come to the realization of how non-refundable these steps are towards destro
Response: Comment incomplete.	
Cook, Cheryl Lynn	STOP IT WHILE WE STILL CAN....
Response: Comment acknowledged.	
Cook, Jan	For the sake of the climate, oil needs to stay in the ground. Thank you for reading my letter.
Response: Comment acknowledged.	
Cook, Joyce	Thank you for reading my letter: This is a recipe for disaster. We are talking about everyone's home and family, all our clean air and water. This is pure folly to make an already flawed action even worse. It be different if there was no alternative, but
Response: Comment incomplete.	
Cook, Libby	NO more oil terminals in this State! I have seen first hand the oil spill in Alaska and worked on the gulf. Oil spill. Spills do happen. We don't want them here in WA.
Response: Comment acknowledged.	
Cook, Terry	My friends and I spend a lot of time recreating in this area every year. It would be devastating to risk this ecosystem to the sloppy mismanagement so common to the oil industry. Please do not allow this possibility to become a reality.
Response: Comment acknowledged.	
Cooper, Theodore	This proposal has too many unacceptable environmental risks. Oil spills can never be completely cleaned up.
Response: Comment acknowledged.	
Copeland, Roxanne	We have a chance to stand up to the oil industry now and slow the dangerous expansion of oil transport! Save our beautiful state
Response: Comment acknowledged.	
Copenhaver, Patricia	At a time when we're trying to move away from fossil fuels f any kind the last thing we need is another filthy pipeline. The danger of oil pills, explosions, and water pollution are not worth it and do not offset whatever benefits there may be.
Response: Comment acknowledged.	
Corcoran, J.	Cowspiracy.com
Response: Comment does not relate to the proposed action or the EIS.	
Cordero, David And Ann	We are alarmed that oil trains are increasing as this is a hazard to public safety. We do not want oil terminals in Grays Harbor or Longview.
Response: Comment acknowledged.	

Commenter Name	Comment
Cornelius, Diana	Enough already! Read the writing on the wall. Those who do not learn from their mistakes are doomed to repeat them. Etc., etc., etc. It's time "we the people" require those whom we have chosen to speak for us to do the job they are being paid for. Big mo
Response: Comment incomplete.	
Cornell, Ralph	stop this over expansive work of oil pipe lines that are no longer necessary
Response: Comment acknowledged.	
Corona, Marianne	This is certainly not the future we want for our children!
Response: Comment acknowledged.	
Corvino, Sean	ITS GTTNG WRMR EVRY DAY! óhaYng3 th3 Kod3 > Go SOuLAR w/ #YaWNMoWeR ma$h 'ag L3V3LUT!ON
Response: Comment acknowledged.	
Costello, John	the future is NOT oil
Response: Comment acknowledged.	
Coston, Bruce	Stop the insanity.
Response: Comment acknowledged.	
Cote, Renee	Washington is a beautiful state and should not be threatened by oil spills.
Response: Comment acknowledged.	
Cotterman, Diane	Thank you for reading my letter.If it was not for all this crap like oil spills train wreck and the oil spills on the land and drilling off shore the ocean life would be safe from harm and as on land after the SOB drill and dump there crap the land is no
Response: Comment incomplete.	
Coulson, Barbara	Thank you for allowing me to comment on the proposal by oil companies to build oil export terminals on Washington's coast. This could turn our country into a thoroughfare for crude oil transportation by rail and oil tanker. The draft environmental review
Response: Comment acknowledged.	
Courtright, Sally	I'm from Albany, NY where the oil trains are a part of the picture. One company had plans to build a facility to accept tar sand oil from Alberta, Canada.....from three thousand miles away! Presently, there is a moratorium on that project.
Response: Comment acknowledged.	
Cousin, Wanzie And Charles	Keep our oil in the U.S.A.
Response: Comment acknowledged.	
Covelli, Chris	I oppose the development of oil transport terminals in Grays Harbor, WA, or any other place in the United States. We need to develop electric and other transportation solutions before continuing to excessively dump more CO2 into the atmosphere.
Response: Comment acknowledged.	
Covington, Gaya	We must stop this dangerous and unhealthy plan!
Response: Comment acknowledged.	
Cowan, Christina M.	This is too risky - and only to benefit EXPORT of this oil.
Response: Comment acknowledged.	
Cowden, Anne	We need to preserve the earth before it is too late and keep our cities and highways safe.
Response: Comment acknowledged.	
Cowing, Lois	you know that it is wrong!
Response: Comment acknowledged.	

Commenter Name	Comment
Cozad, Devon	I want my country to be clean and prosperous, moving away from dirty energy solutions into a more sustainable future.
Response: Comment acknowledged.	
Cradler, Fred	The damages beautiful Washington would suffer from these terminals will not be paid for by the oil companies, folks. YOU AND I WILL PAY. Remember BP and the Gulf!!
Response: Comment acknowledged.	
Craft, Karen	Let's stand together and protect our beautiful wilderness against the pollution, trafficking crude oil will cause!!
Response: Comment acknowledged.	
Craig, Ella	We shoudd not let our country become a passsageway for crude oil to go through! Thank you for reading my letter.
Response: Comment acknowledged.	
Cramer, Cindy	I for one am tired of the oil industry holding us all in a monopoly when we are in desperate need of research and development into CLEAN ENERGY. The track record the oil industry has is horrible and we can not risk their frivolous attitude toward this env
Response: Comment acknowledged.	
Crane, Marcella	We should not allow our cities, bays, oceans, our environment to be trampled upon for oil exportation.
Response: Comment acknowledged.	
Crawford, A.	Stop poisoning the planet!
Response: Comment acknowledged.	
Creecy, Ann	this is not the future I want
Response: Comment acknowledged.	
Creegan, Linda	Change from oil to non-carbon-producing forms of energy. Global warming is the most important issue of our time. Thank you for reading my letter.
Response: Comment acknowledged.	
Creighton, Nancy	We can do better than this.
Response: Comment acknowledged.	
Crespi, Sharon	The damage from oil trains and oil shipping terminals would be huge, especially considering the already increasingly fragile marine conditions. Thousands of jobs in the fishing industry would be lost, and an important food source diminished if not erased for decades. Fossil fuels are already on their way out. A huge segment of the WA state economy is comprised of the fishing industry. And then there is tourism, visitors who arrive from all around the globe. To destroy WA state's natural assets is to destroy our future, our families.
Response: Comment acknowledged.	
Crestfield, Richard	For years we have been dependent on foreign oil. I do not agree with now exporting it. We are poisoning our country with fracking, but at least we should limit this damage to our needs until we can replace the need with renewable energy sources.
Response: Comment acknowledged.	
Crichton, Kathleen	Please protect the rich and diverse environment of our beautiful Pacific NW.
Response: Comment acknowledged.	
Crist, Kathy	We will not have our country turned into an industrial wasteland to support the super rich! Stop pushing us!
Response: Comment acknowledged.	
Cromwell, Laura	Break the iron grip of the toxic oil industry and reject the proposed terminals.
Response: Comment acknowledged.	

Commenter Name	Comment
Crook, Paula	Don't promote a polluting and dangerous industry at the expense of the public.
Response: Comment acknowledged.	
Crosby, David	When will they admit that pumping crude is a massive danger to this planet. Those money hungry senseless jack asses. The Bush family should be ashamed of them selves for what they are financing.
Response: Comment acknowledged.	
Crosby, Stacey	We have the intelligence to find other sources of fuel for our automobiles. What we should be doing is phasing out fossil fuels altogether. They have destroyed the environment. The pipeline is an unfair infringement on the safety of the world and shoul
Response: Comment incomplete.	
Cross, Andrea	Thank you for reading my letter. The risk is too great to transport crude oil across our land and pristine marine waters. Don't do it!!!
Response: Comment acknowledged.	
Cross, Dave And Rita	Please, say "NO" to the proposed terminals!
Response: Comment acknowledged.	
Crow, Jeffrey	Grays Harbor &/or the Washington Coast IS NOT the place for an oil terminal. Please take this BAD idea somewhere else.
Response: Comment acknowledged.	
Crowley, Kate	There are so many reason to change this practice. We should be doing everything in our power to shift AWAY from fossil fuels, not building more infrastructure for it. Thank you for reading my letter.
Response: Comment acknowledged.	
Crowley, Madeline	There is much to lose and little to gain for this here - the profits and the bulk of the jobs will be in oil producing states and countries and we'll be left with their mess. As AK and our southern states have seen, oil companies will kill fishing and the
Response: Comment incomplete.	
Crownover, Terry	In addition to the environmental concerns, oil extracted from--or imported to--the United States should only be used for the benefit of U. S. citizens--NO EXPORTS.
Response: Comment acknowledged.	
Cruise, Roger	We have safer, better and more sustainable alternatives to satisfy the demand for energy in the NW.
Response: Comment acknowledged.	
Crymes, Joe	We reduce our consumption of fossil fuels to help control global warming, but allow those fossil fuels to be burned elsewhere-- NO WAY!
Response: Comment acknowledged.	
Cudworth, Deborah	Stop the building of oil terminals on Washington's coast!
Response: Comment acknowledged.	
Cuic, Nina	WE HAVE TO THWART THE CONTINUING PROMOTION OF DIRTY POLLUTERS AND SHOW THE COURAGE TO CHANGE
Response: Comment acknowledged.	
Cullison, Beth	Thank you for reading my letter.This project is high risk for land, water, wildlife, air quality even, and creates FEW jobs. Only oil barons profit. Put the money into renewable energy. Time for the oil boys to diversify!
Response: Comment acknowledged.	
Culp, Lisa	Thank you for reading my letter. Keep America safe!
Response: Comment acknowledged.	
Cummings, Loretta	Please think of the future.
Response: Comment acknowledged.	

Commenter Name	Comment
Cummingsc, Terrence	Imagine the end of fossil fuels.
Response: Comment acknowledged.	
Curl Cooper, Vicki	This proposal is too dangerous for Grays Harbor and for our country's roads & railways! Please protect America!
Response: Comment acknowledged.	
Currah, Nancy	Thank you for reading my letter. We know this dirty fuel is signing our death warrant, we know this! If one needs infrastructure..put the money into that! This action highlights yet another theft of tax payer funds. the action constitutes malfeasance an
Response: Comment incomplete.	
Curry, Bill	We need to keep Washington beaches clean and keep the ocean environment clean and safe for marine life. No oil tankers!
Response: Comment acknowledged.	
Curry, Marcia	NO NO NO to Crude Oil Traffic, OIL SPILLS & Carbon Pollution
Response: Comment acknowledged.	
Curtin, Mary	Thank you for reading my letter. Stop our country from being turned into a crude oil thoroughfare. It's not at all what we want. We want it stopped, now!!!
Response: Comment acknowledged.	
Curtin, Melissa	Please this is not the future we want. Protect the earth. Protect its harbors.
Response: Comment acknowledged.	
Curtis Lee, Virginia	Wind, solar and geothermal only require affordable access to the electrical power grid--not billions to go into the pockets of climate destroyers and the Congresspersons they own.
Response: Comment acknowledged.	
Curtis, Michelle	There has to be a better way than risking habitats and communities.
Response: Comment acknowledged.	
Cushman, Jean	I want my children to be healthy and my grandchildren to grow up.
Response: Comment acknowledged.	
Dacey, Judith	Thank you for reading my letter.the purpose of an elected government is to look out for its' citizens & land; the purpose of Government SHOULD NOT BE, raping the landscape, exploiting the citizens in order to line the pockets of billionaires & parasitic
Response: Comment acknowledged.	
Daggett, Johanna	The Pacific NW is known for it's wildlife and vegetation. Allowing oil shipping terminals is a disaster waiting to happen - it will be the Gulf Coast, the Alaskan Coast, etc all over again.
Response: Comment acknowledged.	
Daigle, Claudia	This is not acceptable. Oil, coal, and gas are dying. We need to invest in clean and safe energy, not the past. Thank you for reading my letter.
Response: Comment acknowledged.	
Dailey, Mary	We need to also stop exporting oil for a better price than we get here.
Response: Comment acknowledged.	
Dale, Garry	There is no way to mitigate the risks and dangers of these crude oil terminals. Please reject these proposals!!
Response: Comment acknowledged.	
Daley, Karen	It seems that the increased transport paths will be too much risk for the general public. I've seen pictures of terrible fires that have many people in a small town, I believe it was in Washington.
Response: Comment acknowledged.	
Daley, Liz	We need to do more to stop accidents that ruin our communities from happening.
Response: Comment acknowledged.	

Commenter Name	Comment
Daly, Susan	I object to all crude oil being transported through Washington State. It puts our environment at risk with no benefits to the citizenry...only the huge costs of paying for the infrastructure needed to accommodate the added trains!
Response: Comment acknowledged.	
Dalzell, Amy	It's your job to read my letter.
Response: Comment acknowledged.	
Damon, Chris	Stop the explosive pollution trains!
Response: Comment acknowledged.	
Daniel, Laurie	To Whom it may concern at WA Dept of Ecology and the City of Hoquiam - The proposed terminals, the trains and the parade of tankers and barges pose a risk of oil spills, explosions and coastal development in an unsustainable, fated industry are unaccept
Response: Comment acknowledged.	
Daniels, Cathleen	We do not need oil shipping terminals in the NW. There are already too many spills that are happening right now. We demand you stop the expansion in our beautiful Pacific NW!
Response: Comment acknowledged.	
Daniels, Mary	If these terminals are built, it will not only be a disservice to the health of community members and many others along the land routes, and to the environment on land and in the oceans, but it will be an economic disservice to the community itself because fossil fuel's days are now clearly numbered, especially in a progressive state like WA.
Response: Comment acknowledged.	
Daniel-seabolt, Darla	Stop it all forever!!
Response: Comment acknowledged.	
Darden, Ruth	These proposed oil terminals will help only the oil companies. Everyone and everything else will suffer harm. Do not build oil terminals in this precious area.
Response: Comment acknowledged.	
Daugherty, Charles	It's time we began cleaning up the mess these corporations have made--not creating a bigger one.
Response: Comment acknowledged.	
Daversa, Frank	Stop the expansion of dangerous oil transport because it is the right thing to do.
Response: Comment acknowledged.	
Davidsen, Bill	the crew coming out of the sand should be created to clean oil BEFORE delivery.sending dirty oil all the way to Texas or similar areas and then after cleaning sending them back to the rest of the US is simply a very high risk and in some cases a very high
Response: Comment acknowledged.	
Davidson, Beth	STOP TREATING OUR COUNTRY AND OUR OCEANS LIKE A DUMP! our country doesn't need and doesn't want more dangerous oil trains and refineries along the coast. The Stanford "Solution Project" clearly shows the best energy future for our country based on clean
Response: Comment incomplete.	
Davidson, Lisa	Please do not allow this to happen - there is no reason for doing this AT ALL!!
Response: Comment acknowledged.	
Davidson, MJ	No nasty expansion into Grays Harbor. Bring life-sustaining work instead!!!
Response: Comment acknowledged.	
Davies, Charlene	Destroying more of the planet should not eve be an option. Don't let oil companies ruin more natural habitats.
Response: Comment acknowledged.	
Davies, Valerie	This increased oil train traffic is NOT the future we want for our family
Response: Comment acknowledged.	

Commenter Name	Comment
Davis, Carla	It is always the right time to do the right thing!
Response: Comment acknowledged.	
Davis, J L	Oregon doesn't need to be a transport factor for Canada to keep dirty oil out of their country. Say "NO" to shipping Canada's oil to Asia.
Response: Comment acknowledged.	
Davis, Jacob	Please... not only are the risks not worth the rewards but building more infrastructure for one of the dirtiest forms of energy production is not the way to go. We MUST switch to renewable energies if our species (and most others) are going to have a cha
Response: Comment acknowledged.	
Davis, Joan	Please STOP the dangerous expansion of oil transport in Gray's county. I understand the risks, and it's not worth it.
Response: Comment acknowledged.	
Davis, Kat	Time to be loving and caring life savers...not evil greedy killers!!!
Response: Comment acknowledged.	
Davis, Kathleen	Thank you for reading my letter. We must protect our world!
Response: Comment acknowledged.	
Davis, Michelle	Expansion of oil transport is just one more reason to keep oil in the ground!
Response: Comment acknowledged.	
Davis, Norman	Idaho's treasure is it's relatively pristine water systems. We should never put them in jeopardy. Where there is oil transportation, there are oil spills. If Canada wants to ship its oil to Grays Harbor, they can ship it through British Columbia, NOT Idah
Response: Comment acknowledged.	
Davis, Patrick	We don't need anymore oil spills or fires.
Response: Comment acknowledged.	
Davis, S. Elaine	I vote for Mother Earth
Response: Comment acknowledged.	
Davison, William	please stop oil expansion.
Response: Comment acknowledged.	
Dawson, Elizabeth	oil is past its prime, let us move on
Response: Comment acknowledged.	
Day, Craig	Quit cramming explosive crude down everyone's nose and throat. Do not support ANY weakening of the Crude Oil Export Ban!
Response: Comment acknowledged.	
Day, Cris	No Planet B.
Response: Comment acknowledged.	
Day, Edward	Let's lead the way in this 21st century, not wallow in the filth of the 19th!
Response: Comment acknowledged.	
Dayton, Gary	I've been reading and watching a lot of information about the oil spills that have occurred during the last two years in Quebec, Canada, Alabama, Pennsylvania, North Dakota, Virginia, and West Virginia. It seems the risk of accidents resulting from human error, bad tracks, faulty maintenance, obsolete rail cars, excessive speed, poor training, etc, etc, is considerably higher than the oil and railroad corporations want us to be believe. The potentially explosive risks to the people who live in Camas, Vancouver, Ridgefield, Kelso, Longview, and other towns and cities along the proposed route are real and it boils down to not if an accident occurs, but when it will occur. The possibility of a major oil spill occurring right next to the Columbia river again appears to be not if it happens but when and the environmental damage to the fishing, recreational, farming, and tourist industries, plus the

Commenter Name	Comment
	hundreds of small businesses located right next to the Columbia River along the proposed route could be horrible in terms of loss of life, jobs, revenue, and reimbursement for damages. The amount of new jobs created in Washington would be minor. Why should we the people of the State of Washington take so many risks just so the oil and railroad industries which already receive huge federal assistance each year can make even more enormous profits. Moving hazardous material in such large quantities through our state greatly increases the chance of an accident. The majority of the oil will be shipped overseas. How do the American people benefit from this. In addition the movement of this type of material along this route could make it a prime target for terrorist activity. This is something the oil and railroad companies don't even want to talk about. It's not something I like to write about but burying your head in the sand will not make the problem go away. With ten minutes of research on the internet one can learn how to knock a train off its tracks. Many of these oil trains are close to a mile long. They are in reality a large, relatively slow moving, explosive, and easy to hit target, especially when they go through cities and towns. The current tank cars can be penetrated by an hunting rifle used to shoot elephants with a high velocity, hardened bullet. The railroad companies say these cars will be phased out over time. The steel on the proposed replacement model will not stop an armor piercing bullet. For those who don't remember I would like to remind you that during the war between Iraq and Iran oil tankers were destroyed. During the Gulf war oil fields were set on fire by the retreating Iraq Army. In addition American Intelligence knew there was the possibility of another terrorist type attack on the World Trade Center before 9/11. Yet we were still unable to prevent it. In my opinion we should be spending more time and effort in our state developing clean, environmentally safer forms of energy. Do not build the oil terminals at Grays Harbor. Thank you.
Response: Comment acknowledged.	
De Andrade, Luci	Don't destroy ANY PART of my state !!!!!!!!!!!!!!!!!
Response: Comment acknowledged.	
De Falco, Karen	We need to clean up, not provide more environmental problems!!
Response: Comment acknowledged.	
De Grassi, Alexancer	Thank you for reading my letter. It's time to focus on building a stronger alternative energy infrastructure, and we can do it--without more rail for oil. Sincerely, Alex de Grassi
Response: Comment acknowledged.	
De Groot, Pat	no more oil!!!!!!!!!!!!!!
Response: Comment acknowledged.	
De Nicola, Franco	It's time to stop the madness of fossil for fuels for profit and power march towards extinction of the living creatures on this planet. It's time to tell the wealthiest 1%, enough!
Response: Comment acknowledged.	
De Palo, Leslie	PLEASE, let us band together against these thoughtless individuals!
Response: Comment acknowledged.	
De Rosa, Kirsten	Stop the expansion of crude oil!
Response: Comment acknowledged.	
De Witt, Lisa	Moving toward renewable energy is the most cost-effective and responsible way to help both people and the environment. Let's face it, oil is going the way of the dinosaur and it is time to move into the future understanding that the old way is a treacherous path that has many dangers.
Response: Comment acknowledged.	
De Wolf, Philip	Thank you for reading my letter. It is time to move on from poisoning us.
Response: Comment acknowledged.	
Dean, April	We have enough land already polluted in our country. Let's not add to it. One leak would be a disaster.
Response: Comment acknowledged.	
Dean, James	I am against these new shipping terminals.

Commenter Name	Comment
Response: Comment acknowledged.	
Dean, K Michael	Thank you for reading my letter.To expect the talmudic, house of rothschild stock controlled media to ever display, talk, write about, advertise truth is lunacy. The talmudic 1800 inbred cousins of the bauer, stearns, schiff, warburg, steyer, khun, loeb,
Response: Comment incomplete.	
Dean, Sue E.	No oil transport through the U. S.! time to leave fossil fuels in the ground!
Response: Comment acknowledged.	
Deane, James	Please put the environment first. Reject the oil industry plan.
Response: Comment acknowledged.	
Dearien, Jay	I've been hearing about major disasters to do with oil trains crashing or rolling off the rails and destroying entire towns and regions. There IS that much oil on one of these trains. I also hear that the tank cars used are of old design and have many dangerous flaws that can cause them to spill or roll off the rails. I don't want any of this to happen in Idaho, and I have serious doubts that it won't if oil trains are allowed to go through Idaho.
Response: See Response to FL6-1.	
Dearmont, Marjorie	Thank you for reading my letter. we must take steps to protect our land from further degradation!
Response: Comment acknowledged.	
Debell, Carol	There is so much more hope and clear sky potential in renewable energies than in further enabling and helping to expand the use of OIL!
Response: Comment acknowledged.	
Deblase, Renetta	Please help keep our environment healthy and clean by preventing oil spills and other accidents that hurt our communities.
Response: Comment acknowledged.	
Deboni, Thomas	Thank you for reading my letter.leave it in the ground!
Response: Comment acknowledged.	
Deck, Margaret Anne	There is such an oil glut in the U.S. that the oil companies are pressing to export domestic oil products. Why endanger our population and countryside to transport oil that our country does not need.
Response: Comment acknowledged.	
Decrescenzo, Jocelyn	Just say NO!!! In order to stop global warming, we must use proven alternate energy methods and structuring. KEEP FOSSIL FUELS IN THE GROUND where they belong. No reason to use outdated and carbon footprint damaging beyond belief sources when clean, mean
Response: Comment incomplete.	
Dede, Kisten	Those who live in Oregon will be harmed by the rail tankers, there is only harm to the environment and no benefit. I am an Oregonian opposed to the use of my home on land and sea for the benefit of an outside company. The company will have no incentive to
Response: Comment incomplete.	
Dee, Amy	Please do not allow expansion of oil transportation in the Northwest. I currently live near a superfund site and know all too well firsthand the long-term consequences of oil spills. For so very many reasons, we need to make the switch to renewable, safe
Response: Comment incomplete.	
Defield-ostrom, Madisyn	We need to be getting away from fossil fuels, not adding more routes for fossil fuels. Washington is a beautiful state with tons of wildlife. They shouldn't suffer due to the idiocy that is our dependence on fossil fuels. I'd rather stop using my car than
Response: Comment incomplete.	
Degeneffe, Lois	You will be held accountable for your actions someday.

Commenter Name	Comment
Response: Comment acknowledged.	
Dehuff, Emily	Don't want to see my hometown ablaze on the eleven o'clock news. Can you blame me?
Response: Comment acknowledged.	
Del Plato, Anthony	Thank you for reading my letter and considering the first steps to turn the problems of climate change around. Leave fossil fuels in the ground.
Response: Comment acknowledged.	
Del Prado, Anne	No, no, no. What part of no more oil transport expansion don't you understand? Keep it in the ground.
Response: Comment acknowledged.	
Delamater, Adair	Thank you for reading my letter. Every dollar that is spent promoting the use of fossil fuel is stolen from our children and grandchildren. Save their future, and leave the fossil fuel in the ground.
Response: Comment acknowledged.	
Delaurier, Mark	Washington Department of Ecology and City of Hoquiam, I am writing as a resident of Grays Harbor County to ask that you reject the proposed Westway and Imperium oil shipping terminals. Personally, I cannot believe you are even considering the proposals.
Response: Comment acknowledged.	
Delcore, Ursula	My husband and I have a daughter and we have 2 boys for grand children. We have the good fortune that we live in a watershed area that supplies NYC with drinking water, that at the moment appears to be reasonably clean. We MUST keep it that way.
Response: Comment acknowledged.	
Deluca, Greg	No, no, no. Keep the oil here in the US. Don't risk sending it abroad when we will need in here tomorrow. We'll need it for lubrication, not energy. It is too dirty to burn!
Response: Comment acknowledged.	
Demaddalena, Deborah	No more expansion of any fossil fuel initiatives.
Response: Comment acknowledged.	
Dember, Russell	The United States should be saving its oil for future use and not exporting it.
Response: Comment acknowledged.	
Dembski, Paul	STOP THAT
Response: Comment acknowledged.	
Demeritt, Kathryn	Please stop the trains. If they must go through, then make the oil companies sign a contract stating they will pay the full cost of cleanup and job loss, etc, and continue paying until the area has been returned to its pre-spill state.
Response: Comment acknowledged.	
Denk, Chuck	For every Oil Tanker allowed to deliver oil, each trip increases the odds of an oil spill where the most possible damage can be done.
Response: Comment acknowledged.	
Denk, Pamela	Washington is a beautiful state, as are our other 49, as protectors of our planet we need to tell business to stop. Even big oil company executives have GRAND CHILDREN.
Response: Comment acknowledged.	
Denne, Leona	Thank you for accepting that it would be best to put this money to use developing sustainable, energy resources that will last well into our children's futures.
Response: Comment acknowledged.	
Dennis, Clay	The only place oil trains should be allowed is on Dick Cheney's property. That's where all fracking should be done as well.
Response: Comment acknowledged.	

Commenter Name	Comment
Dennis, Janis	We do NOT need your transported oil in Grays Harbor. And we don't want the "oil trains" bringing oil to the west coast. Leave it in the ground!! We must not take your "money" and we do not need the "risks".
Response: Comment acknowledged.	
Denny, Patricia	Few communities anywhere are safe from these oil trains. Here in NE Ohio, the railroad lines run next to homes, schools, churches, businesses, etc. The madness must stop!
Response: Comment acknowledged.	
Denton, Toni	Washington state is stunning and we have always taken care of it. Let's not ruin for the sake of rich guys and a dying industry. We will never get it back. Grays Harbor is precious to all lives - land an sea
Response: Comment acknowledged.	
Depalma, Donna	Please stop the pipeline of crude oil on very old ill maintained infrastuctures, Why transport this debri across our beautiful country. Why risk spills and nuclear type explosions witnessed a on TV.Let reason prevail Thank you.
Response: Comment acknowledged.	
Depaoli, Birgitta	It's time to move on to clean energy. When we make hard choices and do the right thing, then the right things happen to us.
Response: Comment acknowledged.	
Depew, Sheila	Don't risk oil spills.
Response: Comment acknowledged.	
Derey, Maura	Please do not do this! We do not need more crude oil rail traffic, oil spills etc Thank you!!!
Response: Comment acknowledged.	
Dersch, Lou	We must start to move away from fossil fuels, not enable the oil industry! By the way, whose money would build these facilities, the oil industry or our tax monies???
Response: Comment acknowledged.	
Detwiler, Ronald & Christ	Our fragile environment need to be protected, NOT threatened!!
Response: Comment acknowledged.	
Deucher, Clare	Invest in clean energy resources instead!
Response: Comment acknowledged.	
Devault, Judy	Oil is dangerous and spills are not worth the damage.
Response: Comment acknowledged.	
Devereaux, Robert	Why doesn't Canada handle their own material. If the terminals have to be built, and don't. Already exist, then why don't these inept Canucks build their own on their own west coast? Don't they know how? Or is it that in case there is an environmental cat
Response: Comment incomplete.	
Devillier, Azarias	Stop dangerous expansion of oil transport
Response: Comment acknowledged.	
Devito, Leah	Please protect the magnificent PNW
Response: Comment acknowledged.	
Devore, Risa	Please do not allow the transport of crude oil through our state. The risks to our environment and our health are not acceptable.
Response: Comment acknowledged.	
Devos, Kathy	we do not want tankers transporting oil across this country. Leave it in the ground.
Response: Comment acknowledged.	
Devos, Kathy	We need less fossil fuel transportation in congested areas.

Commenter Name	Comment
Response: Comment acknowledged.	
Dewan, Donna	protect the earth and citizens and stop pandering to big oil.
Response: Comment acknowledged.	
Dewar, Pat	No company or government has the right to destroy the lands, waters of the world. No company or government actually knows how to ship or transport oil and safety measures are low standard.
Response: Comment acknowledged.	
Deweese, Cokey	As a grandmother, I feel passionate about protecting our environment for future generations. We have done so much damage during my lifetime - let's turn things around before it is too late.
Response: Comment acknowledged.	
Dewitt, Vernon	I completely fail to see the advantage to the whole of the United States of America to facilitate the Canadian oil industry, at taxpayer expense and with US citizens bearing the brunt of the risk. Thank you for reading my letter.
Response: Comment acknowledged.	
Deyoung, Frank	COME ON MAN
Response: Comment acknowledged.	
Di Santo, Denise	Let's not take the road that allows a potentially lethal situation for our natural resource base and ecosystems.
Response: Comment acknowledged.	
Diamond, Glenn	"TOO MUCH RISK (FOR) TOO LITTLE REWARD" pretty much says it all. Thank you!
Response: Comment acknowledged.	
Diamond, Mitchell	...and to the Plutocracy for which it stands...
Response: Comment acknowledged.	
Diaz, Sarah	Oil is diiiiiiiirty.
Response: Comment acknowledged.	
Dicaprio, Carol	Our precious environment is needing our protection - now! - before it's too late. Please do the right thing for all of us and for future generations by not supporting the transport of crude oil in our country. Thank you for your time.
Response: Comment acknowledged.	
Dickinson, James	Thank you for reading my letter. Shipping dirty energy offshore puts us at risk, both from accidental spillage and climate change. We should learn from past mistakes and not move forward on shipping oil overseas.
Response: Comment acknowledged.	
Dicks, Timothy	It's time recognize our limitations and live within our means while we still have a hospitable habitat to do so.
Response: Comment acknowledged.	
Diegoli, Debra	Stopping Keystone XL is important, but we also need to stop other means of transporting tar sands oil. We don't need it, and we don't need to export it.
Response: Comment acknowledged.	
Diehl, Daniel	No more oil terminals - no more oil trains - no more oil pipelines
Response: Comment acknowledged.	
Dietzer, Margot	Clean energy! Clean energy!
Response: Comment acknowledged.	
Difrank, Linda	NO please, to the dangerous expansion of oil and tar sands on our Washington coast!!!
Response: Comment acknowledged.	

Commenter Name	Comment
Digiovanni, Robert	Thank you for reading my letter. And thank you in advance for taking action to prevent yet more pollution of our lands.
Response: Comment acknowledged.	
Dignazio, Teri	So much activity inevitably leads to spills and accidents. Prevent now.
Response: Comment acknowledged.	
Dildine, Charles	this is an act of power and greed at the highest level with No regard for the potential environmental destruction of land , water, and air.
Response: Comment acknowledged.	
Dileo, Carmine	The oil industry is trying to wring out the last bit of profit by selling its product overseas - but as we have seen, oil and coal burned overseas eventually effects our air and climate here - for better or worse WE ARE ALL CONNECTED !
Response: Comment acknowledged.	
Dimario, J. (larson)	Isn't there more than enough proof that this is not a good idea, actually, a bad idea?
Response: Comment acknowledged.	
Diskin, Patricia	We need to stop supporting these companies and their dangerous actions. Clean solar, wind and hydropower are all we need.
Response: Comment acknowledged.	
Ditieri, Lawrence	oil is the dirtiest energy source around, invest in solar and other clean energy sources
Response: Comment acknowledged.	
Ditore, Steve	Exporting oil only promotes fracking in the U.S. and exacerbates oil addiction in developing economies. We should be exporting sustainable/renewable fuel technologies, not fossil fuels.
Response: Comment acknowledged.	
Ditrapani, Brenda	Please stop before it's too late! Thank you for reading my letter.
Response: Comment acknowledged.	
Divito, Marty	Please do not offer any more corporate welfare to the oil industry. Our country bears to high of a cost supporting them. Do NOT ALLOW any TERMINALS! Thank you for reading my letter.
Response: Comment acknowledged.	
Dixon, Pam	The environmental impact of any oil spill would be devasting to this region.
Response: Comment acknowledged.	
Dobrowolski, Bob	We have already had such a train cause considerable damage here in N.J. with no consequences to anyone except the local citizens. It has to stop!
Response: Comment acknowledged.	
Dobson, Linda	Please don't ship this oil. Protect our environment~~
Response: Comment acknowledged.	
Dodd, Laura	Please help save marine habitats!
Response: Comment acknowledged.	
Doebel, Norman	Is anyone looking at the big picture in a long range way? Pollute less-not more. Thank you for reading my letter.
Response: Comment acknowledged.	
Doherty, Jessica	SOLAR POWER doesn't require so much $$$, effort, time, nor greed!!!!
Response: Comment acknowledged.	
Doll, Carl	Take a stand against furthering the damage from fossil fuels extraction. Stop all planned projects for facilitating this destructive industry.
Response: Comment acknowledged.	

Commenter Name	Comment
Dollard, Nancy	We must PROTECT the environment and ALL wildlife in it!!! Thank you for reading my letter.
Response: Comment acknowledged.	
Dolphin, Jacqueline	Not in any of our country's back yards!
Response: Comment acknowledged.	
Domingue, Charles	The ongoing viability of our planet requires an immediate and severe reduction in our emission of greenhouse gasses. Building additional infrastructure to support transport of oil is incongruent with this mission.
Response: Comment acknowledged.	
Donahue, Nona	Start supporting energy generation from non-polluting sources. Do not facilitate oil.
Response: Comment acknowledged.	
Donaldson, Marcy	Thank you for reading my letter. Enough with the transportation and oil export terminals. I have a dream - a massive federal project to convert everything, including cars, to clean energy. No more exploding trains on our decrepit rails system, no more hi
Response: Comment incomplete.	
Donitz, Claire	Thank you for reading my letter. We must think of the future and save our land for our children and the animals that will disappear Do not pollute our world
Response: Comment acknowledged.	
Donley, Laurie	This has to be stopped soon.
Response: Comment acknowledged.	
Donnelly, Susan	We know there are better, cleaner, safer ways to get energy. Why are we still putting our people and environment at risk?
Response: Comment acknowledged.	
Donovan, Joan	Learning to conserve plus using wind and solar energy is the wave of the future. These are the programs needed now along with bio-fuels made with tree waste by insects (something that is near mass production now). We must protect the youth of our natio
Response: Comment acknowledged.	
Doodan, Melissa	We seem to forget that short term gains often equate to long term destruction. Please, think of our unborn, the inheritance that we will leave them. Do not risk our ecological well being for profit.
Response: Comment acknowledged.	
Doran, Kathy	My family lives in Washington. Please don't think about endangering them or the rest of us with these reckless projects.
Response: Comment acknowledged.	
Dorsey, R. Stephen	The oceans are now at grave risk: Fukushima radiation that will go on seemingly forever, overfishing, dumping and the enormous Pacific trash "island", dying wildlife on all of our shores - and now this threat to the sea and we who live onshore. We have
Response: Comment incomplete.	
Dougherty, Sarah	My family visits the Washington sea coast often, and its welfare is of great personal importance to us.
Response: Comment acknowledged.	
Douglas, Carpenter	Oil subsidies, record profits for years, and repaving roads have continually kept oil companies ripe with cash while our infrastructure sags and falls apart. You can pull a rabbit out of a hat but we need a new hat first. Thank you for reading my letter.
Response: Comment acknowledged.	
Douglas, Jayne	sustainable, renewable, local energy sources are required for our national security. This existing system is a monopoly which continually risks the health of our people. Clean, local, sustainable, renewable energy NOW! Thank you for reading my letter.
Response: Comment acknowledged.	

Commenter Name	Comment
Dow, Linda	Thank you for reading my letter. The proposed oil shipping terminals; the explosive, dangerous oil trains needed to feed them will increase global warming. This oil needs to stay in the ground.
Response: Comment acknowledged.	
Dowell, Dennis	Why must we continue this insanity? We know that burning fossil fuels is not only bad for our enfironment, but a serious health risk for all persons. Is the accumulation of money so important that a few will risk the health of others and our world to en
Response: Comment incomplete.	
Down, Arden	We have learned the hard way that oil transport is hazardous. Please do not expand it!!
Response: Comment acknowledged.	
Downie, Barbara	Thank you for reading my letter. I think allowing oil companies to transport oil by rail in massive amounts is a huge mistake. The potential consequence of an accidental spill or derailment is catastrophic. Please stop oil company from this detrimental pl
Response: Comment incomplete.	
Downing, Deeann	It is simple. The risk and costs -- real costs of fossil fuels are too high. Not in our state of Utah--no more please.
Response: Comment acknowledged.	
Downs, Thomas	We won't tolerate or bow to your exploitation by building cat crackers, oil depot's or storage facilities any where in the USA.
Response: Comment acknowledged.	
Doxey, Bruce	Let's just end fossil fuels entirely.
Response: Comment acknowledged.	
Doyle, April	people need to get it through their heads we should be protecting our environment not destroying it but they just don't care and it's really very sad and they're so stupid. they have no idea what they're getting themselves into. our environment is home to everyone and they have no right doing what they're doing.
Response: Comment acknowledged.	
Doyle, Russ	Thank you for reading my letterMake America Clean again. .
Response: Comment acknowledged.	
Dragavon, David	Listen we didn't want coal coming through here either. Certainly don't want oil spilled all over my state either. All I have do do is think of the Gulf Coast and remember the Exxon Valdez to know the industries safety record (not to mention a huge deadly
Response: Comment acknowledged.	
Draxler, Paul-mary	Concentrate on transitioning to renewable energy for the good of us ALL.
Response: Comment acknowledged.	
Dresser, David	Oil ALWAYS leaks. Fumes rise. Spill happen. Entire regions are destroyed when oil is transported. It is especially horrendous to move this substance through peopled areas.
Response: Comment acknowledged.	
Drewelow, Beth	And we need to mention the proliferation of pipelines buklt by FOREIGN countries that want to take our land through eminent domain. ENOUGH! Thank you for reading my letter.
Response: Comment acknowledged.	
Driscoll, Christie	This is extremely important to me!
Response: Comment acknowledged.	
Droz, Beverly	This is so important - thank you for your actions!
Response: Comment acknowledged.	
Druss, Gloria	I worked for an oil company. I know the dangers. Please don't let this happen..
Response: Comment acknowledged.	

Commenter Name	Comment
Duckworth, Nadine	Thank you for reading my letter.Pleaser protect our country and its citizens from crude oil pipeline disasters in an effort to pad "big oil's" pockets!!
Response: Comment acknowledged.	
Duclaud, Monica	It is unthinkable that any decision-maker would support the expansion of oil transport. The risk of massive explosions and spills is too high and the ecological devastation it would bring is a tragedy. For Grays Harbor and for the planet, don't let oil co
Response: Comment incomplete.	
Duffus, Kathleen	Crude oil should be part of the past. There are so many alternatives.
Response: Comment acknowledged.	
Dufner, Angeline	Oil companies' never-ending desire for more money is not an adequate reason to jeopardize the safety of our environment. Our responsibility is to leave the earth intact and healthy for future generations. Short-term, bottom-line accounting cares nothing
Response: Comment incomplete.	
Dumas, Eugene	Thank you for reading my letter, I hope you will give this issue the full consideration it deserves.
Response: Comment acknowledged.	
Dumas, Joan	Please protect the environment and planet for your children and grand children. Please
Response: Comment acknowledged.	
Dumouchelle, Lucille	The risks are not manageable.
Response: Comment acknowledged.	
Duncan, Barbara	We don't need crude oil being transferred across out country This will cause accidents and is not a good idea for our environment!
Response: Comment acknowledged.	
Dunham, Susan	We need to be moving towards more environmentally sustainable approaches. Fossil fuels need to stay in the ground if we wish to not destroy our world entirely, so we've no business expanding pipelines, terminals, etc. for transporting oil.
Response: Comment acknowledged.	
Dunlap Jr, Floyd	I'm All For Protecting The Environment For Future Generations To Come & Also In Favor Of Alternative Energy Sources...!
Response: Comment acknowledged.	
Dunn, David M.	For all the jobs promised please inject a bit of reality: more jobs for people trained to clean up the spills that inevitably happen. More jobs in Health care for the very young and the old who will get sicker than middle aged when the pollution takes its toll. And it takes, it takes...
Response: Comment incomplete.	
Dunn, Pat	this plan is an accident waiting to happen!
Response: Comment acknowledged.	
Durbin, Steve	...what do you get when you cross an oil man with a pig? NOTHING!!! there are some things even a pig won't do...!!!
Response: Comment acknowledged.	
Dusek, Helen	Inconceivable to me that this is even being considered, given the repercussions of potential spills/accidents and history! What does it take to stop this kind of thinking?! In this day and age there are plenty of ALTERNATIVES to Big Oil! Shipping it on/thru/near our Water ways is NOT an option! Helen Dusek
Response: Comment acknowledged.	
Dvorak, Vojin	Everyone, even the oil companies, are in agreement that extracting and burning fossil fuels is destroying both the environment and the planet. Please discourage anything that encourages this destructive, short-sghted, greedy practice.
Response: Comment acknowledged.	

Commenter Name	Comment
Dye, Suzanne	Enough!!!!
Response: Comment acknowledged.	
Dykoski, Dr. William 'skip'	Oil is the past.
Response: Comment acknowledged.	
Dzioba, Martha	The shipping of oil by tanker car is not safe as presently done. It's a gamble with the lives and homes of people who live in the region.
Response: Comment acknowledged.	
E, S	Thank you for reading my letter. please take a look at the Enbridge proposal
Response: Comment acknowledged.	
Eadie, William	Please reconsider the proposed action.
Response: Comment acknowledged.	
Eastridge, Susann	Not only is this a very bad idea to turn our country into a transport zone for crude oil, but the climate cannot stand more fossil fuel burning. It is time to stop the death knoll of carbon, and switch to renewable energy.
Response: Comment acknowledged.	
Ebershoff-coles, Susan	Please do not let these oil spill terminals be built. The danger and the risk of increased spills, pollution, explosions, and destruction is far too great for any perceived benefits.
Response: Comment acknowledged.	
Edain, Marianne	Its not just about the horrendous potential damage to Gray's Harbor and the people along the tracks. Its also about enabling that much more oil to be burned, spurring that much more climate change. Spend the money on major solar and wind installations ins
Response: Comment incomplete.	
Eddy, John	Thanks 4 all U do!! U'll like my song: "Evolution" https://soundcloud.com/3-412/6-evolution
Response: Comment acknowledged.	
Eddy, Sara	The Northwest is a spectacular place that has a culture focused on the use of renewable energy. By putting oil transporters in Grays Harbor it will greatly affect the quality of life for the individuals that reside there and will surely devastate the ecosystems. The expansion of the oil industry must come to a stop.
Response: Comment acknowledged.	
Edge, Rhea	We need sustainable sources of clean energy. change course and stop shipping products that are potentially harmful to our environment.Thank you for reading my letter.
Response: Comment acknowledged.	
Edmond, Tina	No one wants this running through their town.
Response: Comment acknowledged.	
Edson, Barbara	It is time for wisdom and ethical action to protect the lives, the health, the way of life and livelihoods, the environment, the future, by stopping the expansion of oil transport. Accidents happen and when it happens with oil on the land and in the water, the damage is profound and cannot be undone. Compassion for life, not shortsighted greed needs to rule this situation. It isn't worth the risk.
Response: Comment acknowledged.	
Edwards, Barbara	Those who are involved (and Congress) whine about taking better care of the country (environmental issues) that "It will put such a financial burden on our grandchildren" Well, dear folks if your grandchildren have no air to breathe THAT cost will be WAY
Response: Comment acknowledged.	
Edwards, Lance	Thank you for reading my letter. It's time to stop living in the past. Ignoring facts don't make them go away. The self-destructive path we're on is very real. There's money to be made in advancing alternative energy.
Response: Comment acknowledged.	

Commenter Name	Comment
Edwards, Lucy	Thank you for reading my letter. We desperately need to get off fossil fuels, we have so little time left to save our ecosystem from climate disruption.
Response: Comment acknowledged.	
Edwards, Nancy	A railroad track runs right by my house.
Response: Comment acknowledged.	
Edwards, Nora	No oil exports!
Response: Comment acknowledged.	
Eggers, Lynne	I say "No!" to dangerous oil rail traffic - we need unpolluted land, water, and air more than we need this dirty oil. It's time for the oil corporations to stop these dangerous practices.
Response: Comment acknowledged.	
Eggum, Bruce	This money should be spent on Renewable Energy. That would solve the Energy problem and eliminate dangers.
Response: Comment acknowledged.	
Ehmann, Anne	Thank you for reading my letter. Please take time for the following message, thank you. https://www.youtube.com/watch?v=WmVLcj-XKnM
Response: Comment acknowledged.	
Ehrhardt, Carole	It is past time to stop all oil export terminals on Washington's coast. It is time to phase out the use of fossil fuels and if these terminals are built, the oil companies will fight to retain them.
Response: Comment acknowledged.	
Eichman, James	If one explodes in Chicago New York Miami SF La it would be disaster. Oil needs to be transported only in areas that have no population or not at all.
Response: Comment acknowledged.	
Eielson, Olivia	Oil transport by rail is simply unsafe. There have already been accidents - grisly ones, with people killed - I assume, burned alive. Please show some concern for the millions of Americans who live within "striking distance" of a railroad line where oil
Response: Comment incomplete.	
Eiesland, Nora	It is time for oil to end. Stop catering to an industry that is virtually killing us.
Response: Comment acknowledged.	
Eiland, Doris	As a former long time resident of Washington State, I am very much aware that this issue has been viewed by residents for many years as one of extreme importance. It is far more than just a local impact issue.
Response: Comment acknowledged.	
Eilenberg, Alisa	Dirty oil transport puts our citizens and environment at terrible risk. It is not worth it to destroy our what we have in order for outdated oil dependency to yield short-term profits for industry!
Response: Comment acknowledged.	
Eisemann, Sandra	why not underground pipe lines
Response: Comment acknowledged.	
Elder, Olivia	We need to wean ourselves off of reliance on coal, gas, and oil to more sustainable options. Leave it in the ground, and don't allow for more pollution. I know there are so many lobbyists for the coal, oil, and gas industry that urge you to make a decisio
Response: Comment incomplete.	
Elder, Paul	As a life long Resident of Washingtin State, I do not want our environment threatened with a huge increase in oil transportation with all its risks. Thank you.
Response: Comment acknowledged.	

Commenter Name	Comment
Eller, Dennis	Thank you for reading my letter. We lived in the Puget Sound area for several years and still own property there. Puget Sound is too wonderful and too ecologically fragile to risk this excessive assault!
Response: Comment acknowledged.	
Elli, Joyce	We can strengthen our world position by making sure we can be self sufficient when it comes to all the power we need, solar, wind and oil. If we let Big Oil take over the selling of crude oil to other countries we could find ourselves under their thumb much as we were under OPEC. We must not let this happen. Thank you for reading my letter.
Response: Comment acknowledged.	
Ellis, Arienne	More evolved ways of being human and natural united, prosperous and beautiful are calling us to wake up and grow up. Please join the movement that is global and necessary for a future we, all of us, can thrive in. We do not need destructive energy system
Response: Comment incomplete.	
Ellis, Dr. Miriam	It's time citizens stood up to those who endanger our health, and that of our children and grandchildren, and who wantonly pose a threat to the earth, the air, and the water vital to all living things. Stop these greed-driven, fossil power based, inheren
Response: Comment incomplete.	
Ellison, David	Please recognize that an oil future is NOT a sustainable future. Thank you for reading my letter.
Response: Comment acknowledged.	
Elsner, Daniel	Please do not allow transport of oil/coal across our great country so that it can be shipped to other countries. If it stays in the ground it will be available for us in the future without the potential to cause environmental damage during shipping. Is
Response: Comment incomplete.	
Elster, Evelyn	We all know how dangerous this is.
Response: Comment acknowledged.	
Emerson, Judith	Thank you for reading my letter. Please protect the integrity of our west coast's ocean waters and Earth itself!!!!! Thank you.
Response: Comment acknowledged.	
Emerson-cobb, Jin	Thank you for reading my letter. I sincerely hope that you will act on it, as oil transportation is dangerous no matter what method is used.
Response: Comment acknowledged.	
Emmons, Mary	We don't need oil terminals in Grays Harbor.
Response: Comment acknowledged.	
Enevoldsen, David	Thank you for reading my letter. We must not allow our country to continue 'carbon bombing' our atmosphere in any manner, including oil exports.
Response: Comment acknowledged.	
Engel, Linda	No more procrastination. Please take action NOW!
Response: Comment acknowledged.	
Engels, Linda	I live approximately 1/2 mile from the railroad tracks that this oil will be transported on. Not to mention that our Max line (light rail) runs parallel to these tracks and transports thousands of passengers every day. Accidents do happen and this one c
Response: Comment incomplete.	
Englar, Kathy	We should be investing in non-polluting energy infrastructure, not in continued support for the oil industry.
Response: Comment acknowledged.	
Engler, Edward	We need to keep the oil in the ground - and protect our environment!
Response: Comment acknowledged.	

Commenter Name	Comment
Engstrom, Julie	No to Big Oil. WA will not allow oil terminals or any rail lines to assist Big Oil to pollute WA waters and land. As a WA resident this is just Unacceptable.
Response: Comment acknowledged.	
Engstrom, Mary	I want my grandchildren to be safe. Oil transport is unsafe for human beings.
Response: Comment acknowledged.	
Ennis, Ron	We need to do all we can to reduce fossil fuel consumption, not facilitate it. FYI I am 74, a former US Naval Officer who served in Viet Nam and manage a business in Portland.
Response: Comment acknowledged.	
Epeards, Selene	Thank you for reading my letter. We don't need more oil being transported though our roads or rails. Let's stop this before it starts. Thank you
Response: Comment acknowledged.	
Eppinger, Lois	the Great Northwest is beautiful...let's keep it that way.
Response: Comment acknowledged.	
Erickson, Greg	Time's a wastin' on the climate clock. Permitting these oil transport facilities will put us further behind the 8 ball.
Response: Comment acknowledged.	
Erickson, Leland	Enough is enough! When will you politicians and corporate stooges wake up and accept that global warming is a fact, not an opinion?!! Money in your back pocket today from fossil fuel industry lobbyists will not stop global warming! Get it? *You* will not
Response: Comment incomplete.	
Erickson, M.d., Frank	For Pendleton, Oregon with trains running through the middle of town, and for Seaside, Oregon on the coast, I am against oil transporting. It is time for winding down oil extraction and transporting.
Response: Comment acknowledged.	
Erman, Kristin	For too long we have allowed oil companies to privatize their profits and socialize their devastating environmental effects through the use of their product and the accidents that ensue. Thank you for reading my letter.
Response: Comment acknowledged.	
Ernst, Marlene	Please don't dirty the United States with crude. We have enough problems here without endangering us and our wildlife further!!!!!!
Response: Comment acknowledged.	
Errea, Mack	Any and all physical transportation of any all crude petroleum is a clear and present danger to the residents of the affected right of way lands. Ban the above in its entirety. Do it now.
Response: Comment acknowledged.	
Ersik, John	It is time to move to the future!
Response: Comment acknowledged.	
Erthal, Maureen	Thank you for reading my letter. We must start making people most important not oil transportation and oil corporations. Safety must be a requirement of all transportation.
Response: Comment acknowledged.	
Escalona, Arika	The risks of opening the Harbor to oil transport are simply unacceptable. It's not like oil is the only answer. It is time we start investing seriously in renewable energy--this is the inevitable course of action anyhow, so why postpone it and put the environment at such great risk? Does that really serve the public? NO!!!
Response: Comment acknowledged.	
Eschen, John	The first time a train derails, they better hope its not in some residential neighborhood.
Response: Comment acknowledged.	
Esguerra, Celia	Godbless America ,Please Stop increase of railroad traffic oil spills and carbon pollution and Save The People Animals Humans Our Mother Earth

Commenter Name	Comment
Response: Comment acknowledged.	
Esposito, Phillip	Let's look to the future and realize that this old way of doing things destroys our environment and does not help our country work towards the energy future we all want. Let's grow our alternative sources of energy and deploy our efforts to fix our energy
Response: Comment incomplete.	
Estes, Rena	Thank you for reading my letter. There a better ways to make money, oil is limited! Why would you not spend your dollars on solar, wind energy systems?
Response: Comment acknowledged.	
Estes, Rose	Not through my state! Accidents waiting to happen.
Response: Comment acknowledged.	
Etchison, Craig	Each tanker of oil increases global climate change, which threatens to end this world as we know it. Please help stop this insanity. Thank you for reading my letter.
Response: Comment acknowledged.	
Etemad, Marguerite	Thank you for reading my letter. Please preserve our planet for our children's children.
Response: Comment acknowledged.	
Etheridge, Donna	No to big oil. No to their expansion plans.
Response: Comment acknowledged.	
Eubanks, Arlene	What about the earthquake fault off of our coast? The possibility of a Tsunami? With debris? Then there is the problem of oil transport workers not being able to get the shut off values turned off. Lastly, it was found that the berm surrounding the
Response: Comment incomplete.	
Eugenis, Christy	We need industries to very seriously address environmental damage and climate change NOW- and this is a very important step!
Response: Comment acknowledged.	
Evans, Alice	No transport of such crude oil by tankers, barges, or rail.
Response: Comment acknowledged.	
Evans, Evelyn	Thank you for reading my letter. The action you take in this matter is of vital importance.
Response: Comment acknowledged.	
Evans, Margaret	Haven't we destroyed enough of this precious earth for the sake of mankind? Thank you for reading my letter.
Response: Comment acknowledged.	
Evans, Marie	Enough! No more subsidies and tax breaks to oil polluters. The time is now for solar and wind. Stop poisoning the planet and its people!
Response: Comment acknowledged.	
Evans, Patricia	We must limit the need for oil, there by, decreasing the need to transport it. It is a very dangerous material to transport, by rail, ship or truck. Thank you for reading my letter.
Response: Comment acknowledged.	
Evans, Ric	We can't afford anymore catastrophes, oil trains are unsafe, pipelines leak and the oil companies fabricate their own evidence. Enough!
Response: Comment acknowledged.	
Everett, Kevin	Would like to have further public discussion before expanding on the oil transportation in the Northwest.
Response: Comment acknowledged.	
Evinger, Linda	We can not take the risk of further damage to our environment.
Response: Comment acknowledged.	

Commenter Name	Comment
Ewald, Gary And Judy	Just keep in the ground we don't want it
Response: Comment acknowledged.	
Exner, Joan	Why is Canadian oil transport occurring anywhere in the USA? Canada is a big Country with railways & coasts. Perhaps the Canadian citizens know something we do not. The USA does not need to be involved & we should be supportive of the Canadian citizens
Response: Comment acknowledged.	
Fabo, Concetta	Enough! No more dangerous expansion of oil transport in any of our states! Now or in the future! The whole human community needs to respect the gift of Mother Earth. Our environment is very precious. It needs to be cared for by all of humanity and we need to be leaders in this critical situation.
Response: Comment acknowledged.	
Faegre, Dirk	We had our run with fossil fuels. It was a good time but that's over. Now it's time to get serious and work much more diligently (and honestly) at severely reducing our negative impacts on our planet. Solar is an obvious and proven solution. Let's go all in on proving we can be mature adults and leave the dirty fuels behind. Thank you for reading my letter.
Response: Comment acknowledged.	
Fago, John	Thank you for reading my letter. It is time to act forcefully to leave our children a sustainable planet. Carbon based fuels are destroying their chances. Please act now, for the children.
Response: Comment acknowledged.	
Fahrenwald, Paprika	Please slow the production, transportation and consumption of oil and other fossil fuels. We should be putting our efforts and resources into renewable, sustainable energy sources. Thank you.
Response: Comment acknowledged.	
Fairbank, Owen	In addition to the immediate risks to the lands and waters of our communities, encouraging and enabling the extraction and consumption of fossil fuels increases the damaging effects of burning fossil fuels and accelerates climate change. Now is the time to make changes for the sake of our children and all future generations.
Response: Comment acknowledged.	
Falkner, Roberta	Please do not build oil export terminals on Washington's coast. The citizens of the United States deserve peace of mind from the threat of oil spills and carbon pollution!
Response: Comment acknowledged.	
Falkowitz, Nicole	Start caring about our health and safety and stop putting money above all else. It's time for change!!!
Response: Comment acknowledged.	
Fallon, Jean	Whatever happened to safety first? Oh that's right... it has changed to profit first... even only if it is for only a few
Response: Comment acknowledged.	
Falsetti, Catyana	Rather than continue to deplete the oil reserves in the country focus on investing in alternative solutions for energy.
Response: Comment acknowledged.	
Fant, Suzan	Enough of BIG OIL and it's desecration of the planet. This is definitely NOT the future we want or can live in.
Response: Comment acknowledged.	
Farha, Nancy	We've have enough Bomb Trains!! Just all the damage they would do building these terminals is too much! No more!
Response: Comment acknowledged.	
Farley, ED	Leaders of sociopathy - you cannot hide in our tech world -- we can all win when we protect and nourish the entire planet and entire species --- If not -- like communisn - unchecked capitalism will end in ruins ... Thank you for reading my letter.

Commenter Name	Comment
Response:	
Farnsworth, Adrian	Transporting Comment acknowledged.oil through one of our pristine water ways is dangerous and reckless.
Response: Comment acknowledged.	
Farrar, Shari	This is so wrong it boggles the mind. If Canada wants to continue in this vein, then let them invest in refineries and the wherewithall to export their own garbage.
Response: Comment acknowledged.	
Farrell, Ellen	Thank you for reading my letter. Please care enough to do the right thing for our health.
Response: Comment acknowledged.	
Farrell, Nancy	Oil transport is dangerous in every way.
Response: Comment acknowledged.	
Farris, Cathy	Please help stop this insanity. Money does not trump all.
Response: Comment acknowledged.	
Farris, Kerry	Thank you for reading my letter. Please do the right thing.
Response: Comment acknowledged.	
Faudie, Fred	People and the earth before profits please.
Response: Comment acknowledged.	
Fay, Susan	I do not support large infrastructure for nearly outmoded energy sources with high risk, serious damage potential.
Response: Comment acknowledged.	
Fdogjdf, Bonr	Please be aware of the dangers
Response: Comment acknowledged.	
Feil, Marvin	The crude oil will endanger many lives. We don't need it that badly.
Response: Comment acknowledged.	
Feldman, Justin And Ann	Thank you for reading my letter. In our opinion we should be developing more and better renewable energy sources.
Response: Comment acknowledged.	
Felegy, Timothy	We need to stop running headlong into that which we know is unwise. Profits mean nothing. We only believe they do. Please stop and think. We were all born to do right. Listen to your gut. The answers will always come. Thank you.
Response: Comment acknowledged.	
Fellows, Paul R	An oil terminal of the size being proposed is totally beyond the ability of the locality or the State to monitor and prepare for the inevitable oil spill that will take place. Environmental impact should also include the negative aspect of oil on our atmosphere which, since the oil will be exported, will return to us in the form of killer acid rain and other damaging pollutants.
Response: Comment acknowledged.	
Feltham, Wendy	I am against these new terminals, because I am greatly concerned about the risk of oil spills in an area known for recreation, bird migration, and natural beauty.
Response: Comment acknowledged.	
Feltis-german, Lisa	another example of enabling an industry not capable of cleaning up their current environmental messes, much less the unavoidable future ones. Spend the time and money necessary for projects such as these toward developing renewable energy sectors, NOT on life support for failing industries. Thank you for reading my letter.
Response: Comment acknowledged.	
Fenswick, Jennifer	This carbon extraction, export, and usage is INSANITY! It is dangerous, reckless, and threatens millions for the financial benefit of a very few. STOP this expansion!
Response: Comment acknowledged.	

Commenter Name	Comment
Ferguson, Pamela	We've had too much environmental damage from oil. We need to invest in alternative renewable energy.
Response: Comment acknowledged.	
Ferguson, Vicki	Thank you for reading my letter. Please do not turn your beautiful state and coastline into an ecological mess.
Response: Comment acknowledged.	
Fernald, Margaret	This is not the future we want anywhere in our country: the proposed oil shipping terminals; the explosive, dangerous oil trains needed to feed them; and the continual parade of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of communities, the local economy, tribal culture, and our ocean and coastlines at risk - as well as the well-being of the planet as a whole, in contributing to increased climate change and resultant destruction of life. This is not the future any of us wants.
Response: Comment acknowledged.	
Fernandez, Magaly	It is not ethical to put our communities in danger for profit.
Response: Comment acknowledged.	
Ferranti, Elizabeth M	For the lives of our children and grandchildren, we must stop this foolish dependence upon fossil fuels, and throw our full support behind the development of wind and solar.
Response: Comment acknowledged.	
Ferrari, Sheila	Please help save our country.
Response: Comment acknowledged.	
Fiasca, Anna	As a frequent commuter and resident along the Washington State Highway 14 corridor, I regularly see the BNSF crude oil trains and the barges passing along the Columbia River at all hours of the day and night. They are a constant reminder to me of the imminent threat of spills, accidents and fouling of our communities and waterways when things go awry. I do not want the Columbia Gorge to be the transport route for such a dirty commodity. We must do everything we can to protect these precious natural systems from such potentially devastating harm. Please act for the protection of our communities and natural systems and reject the proposal for shipping terminals in Grays Harbor.
Response: Comment acknowledged.	
Fiedler, David	US oil should be kept to meet the needs of the US and eliminate our need to import foreign oil. We should not be building infrastructure to enable export that negatively impacts the environment more than it already is. Thank you for reading my letter.
Response: Comment acknowledged.	
Fieni, Mary	Let's just support solar, wind and geothermal sources of power and be done w/ oil. Too many accidental spills occur. Too many people don't care about this planet. Too many are more concerned about their bottom line to care about their impact on the land a
Response: Comment acknowledged.	
Figueroa, Arturo	It is not in the best interests of the american citizens.
Response: Comment acknowledged.	
Figueroa, Maria	Thank you for reading my letter. Please think about it.
Response: Comment acknowledged.	
Filipelli, Phd, Deborah	I write again to express my strong opposition to the proposed oil terminals at Grays Harbor, Washington.
Response: Comment acknowledged.	
Finazzo, Katie	We have more than enough history we have been able to learn from, the hard way, regarding the drilling, shipping and dealing with oil. Lives have been lost from the human race, the animal and plant kingdoms, marine life. We must start protecting this beautiful, life supporting planet we live

Commenter Name	Comment
	on, if we want it to sustain life as we know it. It is currently the only one we have. Thank you for reading my letter.
Response: Comment acknowledged.	
Findley, Helen	We need to protect our country, not allow dangerous expansion of oil transport. Thank you for reading my letter.
Response: Comment acknowledged.	
Finlley, Patricia	More needs to be done to improve the safety of transporting oil before increasing its transport and distribution. Thank you for reading my letter.
Response: Comment acknowledged.	
Finnegan, John	Thank you for reading my letter. Our planet is close to a tipping point with carbon build-up. We need to do the right thing, now!
Response: Comment acknowledged.	
Fischer, Deborra	Please, do not allow the two terminals proposed for Grays Harbor, WA. The danger presented by oil trains is well established. Bakken crude oil is especially explosive as well as toxic fumes and heavy metals. People oppose these terminals. Washington re
Response: Comment incomplete.	
Fisher, Andrew	The video "Secrets Police Don't Want You To Know" at http://youtu.be/B3nok7Cby28 is 2.5 hours long but it's totally worth your time to watch the whole entire thing because it exposes how the cops, judges, prosecution attorneys, politicians, and car insura
Response: Refer to Master Response for Purpose and Focus of the EIS.	
Fisher, Julie	The Fossil Fuel Industries must die before the earth does. Every aspect of the Fossil Fuel Industries activities are harmful and MUST be reduced and eliminated within 10 years. Any permission to expand or continue with Fossil Fuel activities will only s
Response: Comment incomplete.	
Fitzgerald, Glennis	Thank you for reading my letter. We are already polluting our country at a devastating rate. Don't add more pollutants to it with oil!
Response: Comment acknowledged.	
Fitzgerald, John	Crude oil trains threaten the safety of 25 million Americans in the blast zone. The oil industry moves highly toxic tar sands and volatile Bakken crude oil in unsafe rail cars over tracks that were never designed for this dangerous cargo. Safety standards
Response: Comment incomplete.	
Flaherty, Ned	Oil terminals, oil trains, and oil tankers are not a viable future, because they threaten communities, economies, tribal cultures, and coastlines.
Response: Comment acknowledged.	
Flanagan, Marianne	This is a dangerous expansion that puts the Washington coast at great environmental and physical risk. At a time when we are looking to expand renewable energy, the last thing we need is to destroy Washington's coastal area to ship dirty oil overseas.
Response: Comment acknowledged.	
Flanery, Theresa	Stop stripping the land. Solar is the answer.
Response: Comment acknowledged.	
Flatmo, Carol	That beautiful coastline does not deserve the chance of an oil spill.The forest do not deserve the pollution. The people do not deserve the risk nor does the animal and bird and sea life. The current heads south and the damage would ruin the city's,towns,
Response: Comment acknowledged.	
Flebotte, Katharine	The Earth is our home! We need to treat the Earth as our home not as some commodity.
Response: Comment acknowledged.	

Commenter Name	Comment
Fleisher, Marc	Time to concentrate on renewables. Time to stop supporting Earth-destroyers simply for the sake of their profits.
Response: Comment acknowledged.	
Fleming, Barbara	Let's turn away from fossil fuels and use our technologies to provide healthy. clean , sustainable living .
Response: Comment acknowledged.	
Fleming, William	These facilities are a really bad idea.
Response: Comment acknowledged.	
Fletcher, Carol	Oil does not belong in this environment. Focus on clean energy now.
Response: Comment acknowledged.	
Fletcher, Russell	Thank you for carefully considering my request, and for your work toward a healthy planet, because the earth is the only earth for all of us. Sincerely, Russell Fletcher
Response: Comment acknowledged.	
Flieder, Dee	My family and I vacation in the Gray's Harbor area several time a year. It is beautiful and unspoiled. Please let's keep it that way! NO OIL TRANSPORT in this area!
Response: Comment acknowledged.	
Flock, Margaret	I was raised in Western Washington and now live in Coeur d Alene, Idaho. I don't want an inch of ground from here to there harmed by these trains, trucks and barges!
Response: Comment acknowledged.	
Flum, Char	Consider all the train disasters that have recently taken so many lives.
Response: Comment acknowledged.	
Flynn, John	Time for a CHANGE - a change AWAY from Oil !
Response: Comment acknowledged.	
Flynn, Sharon	Our country must be protected from crude oil spills. Thank you for reading my letter. Sharon Flynn
Response: Comment acknowledged.	
Foglesong, Liz	Keep us safe!
Response: Comment acknowledged.	
Foley, Mary	Thank you for reading my letter. I just wonder when we are going to wake up to the negative side of transporting crude oil. I wish to protect our waters and land for the health of future generation.
Response: Comment acknowledged.	
Foley, Maryellen	Thank you for reading my letter. Harm from this most filthy form of oil will never be overcome. Time to protect the only world we have from further damage this gastly profiteering process commands.
Response: Comment acknowledged.	
Folkerson, Kelbi	We need to do something to save all these magnificent creatures now!
Response: Comment acknowledged.	
Folks, Eric	Our country needs to lead the effort toward renewables, not follow Germany and China, and certainly not invest more in an outdated form of finite, climate-change inducing energy like coal or oil.
Response: Comment acknowledged.	
Follan, Veronica	Moving fossil fuels is dangerous and could cause harm to people along the way.
Response: Comment acknowledged.	
Fontana, Marc	I don't want to see more rail car disasters especially not with cargo as toxic as oil.
Response: Comment acknowledged.	

Commenter Name	Comment
Forencich, Frank	Washington is my home! Please keep it clean. No oil!
Response: Comment acknowledged.	
Forester, Georgna	The oil industry continues to be honest and n all areas that have to do with trying to keep better environment for all people.
Response: Comment acknowledged.	
Forsblom, Deborah	The chances for sabotage, terrorism, or environmental disaster are too great.
Response: Comment acknowledged.	
Forster, Michael	Oregon MUST stand strong against pollution and corporate welfare. Shipping oil through Oregon will hurt Oregon, the Country and the World.
Response: Comment acknowledged.	
Forward, Jean	Thank you for reading my letter.Please listen to this plea.
Response: Comment acknowledged.	
Foster, Delaina	If an oil spill occured, the environmental damage would be significant. The risk isn't worth it.
Response: Comment acknowledged.	
Fowler, Catherine	We need to focus our energy policy on continued development of renewable energy sources. We cannot continue to follow the same path that has created environmental disasters, global warming, cancers throughout our population, war, and economic instability
Response: Comment acknowledged.	
Fowler, Megan	I used to work in the oil industry in Utah. there is enough and to spare in the western US -more than in the middle east. We do not need to continue raping Canada. It is time to restore the lands and use our own resources to support ourselves as we gradually lessen our dependence on oil and move towards clean energy for our nation. Thank you for reading my letter.
Response: Comment acknowledged.	
Fowler, Russell	Washington state does not want it. US citizens do not want it. The world does not need it. Stop oil now.
Response: Comment acknowledged.	
France, Carole	We should be protecting our air, water, earth from all the possibilities that could harm our planet from transporting oil and its products. After a spill happens, our planet and our lives are never the same.
Response: Comment acknowledged.	
France, Kurt	Portland has huge infrastructure issues with Cascadia. Let's not add fuel to the fire.
Response: Comment acknowledged.	
Franceschini, Mary	When are we ever going to learn to protect the people and the environment? Once and for all, stand against the special and dangerous interest industries! Thank you for reading my letter.
Response: Comment acknowledged.	
Francis, Larry	This is a dumb idea--for the USA, for the whole planet, but most certainly for Oregon. Please do what you can to stop this dumb idea.
Response: Comment acknowledged.	
Francis, Stuart	What a ' crude ' business. DON'T BE MEAN, KEEP IT CLEAN!!!!!!!
Response: Comment acknowledged.	
Franklin, Sherra	CLEAN SUSTAINABLE ENERGY NOW! KEEP FOSSIL FUELS IN THE GROUND!
Response: Comment acknowledged.	
Franson, Dhjana	For too long there have been too many "accidents" involving oil spills, etc. Please reject the proposed Grays Harbor oil-shipping projects. Thank you.
Response: Comment acknowledged.	

Commenter Name	Comment
Fraser, Joseph	Increasing the development of risky oil business makes no sense in today's world.
Response: Comment acknowledged.	
Frazee, Cary	These terminals will allow environmental harm.
Response: Comment acknowledged.	
Frazier, Maggie	The LAST thing we (US) need at this point is yet another dangerous dirty pipeline run from the top of this country down to the bottom - We do NOT want to be a crude oil thoroughfare! This dangerous costly traffic is completely unnecessary!
Response: Comment acknowledged.	
Frazier, Michael	We do not want these fossil fuel trains running through out state.
Response: Comment acknowledged.	
Freas, Manette	Thank you for reading my letter. The country needs to move away from fossil fuels; expand renewable energy!
Response: Comment acknowledged.	
Freel, Susan	There have been too many accidents involving crude oil already. If you aren't going to upgrade the infrastructure, you must keep these tankers off of our rails!
Response: Comment acknowledged.	
Freeman, Anna	We do not need to frack to begin with. In addition, transporting crude oil & explosives is endangering the lives of residents and also endangering our land and water. Please do not endanger our country and citizens!
Response: Comment acknowledged.	
Freeman, Deborah	Please protect people from this dangerous process.
Response: Comment acknowledged.	
Freeman, Linda	It is time to end our dependence on fossil fuels and financially support alternative methods.
Response: Comment acknowledged.	
Freeman, Phd, Carrie	it's time to put more efforts into transitioning to clean energy not expanding dirty energy.
Response: Comment acknowledged.	
Freese, Lisanne	Too many trains are going off the tracks. We can't risk spills, explosions and devastating fires. Keep the rails free of dangerous oil transport.
Response: Comment acknowledged.	
Freezegoode, Valentine	If these terminals are constructed, I will rearrange my vacation and work to never visit Washington. Ever again.
Response: Comment acknowledged.	
Fremaux, Charlotte	The fossil fuel industry has done everything in its power to deny the effects of burning and transporting fossil fuels and to pursue their agenda of exploitation and extraction at any cost to our environment and our health. Moving oil by inadequate and d
Response: Comment incomplete.	
Frey, Brenda	We do not need a disaster that will be horrible for humans and wildlife.
Response: Comment acknowledged.	
Frey, Elaine	Thank you for reading my letter. Please stand strongly for the welfare of our planet and it's people at this time of great urgency.
Response: Comment acknowledged.	
Fried, Susan	Don't let Washington State be the next place to experience an oil train disaster like Lac-MΘgantic, Quebec. Over 40 people died, some were even incinerated.
Response: Comment acknowledged.	

Commenter Name	Comment
Friedman, Cherryl	We don't need more oil going thru our states. We need to concentrate more on renewable energy!
Response: Comment acknowledged.	
Friedman, Michael	Why is my health and safety endangered at the whim of big oil. Oh, yeah, profitss come before people.
Response: Comment acknowledged.	
Fries, Warren	be reasonable !!
Response: Comment acknowledged.	
Froiland, K	Stop global warming by stopping the transport of fossil fuels where ever possible. Fossil fuels = death.
Response: Comment acknowledged.	
Frost, Deanna	Oil companies want to expand their Northwest operations by building oil shipping terminals on Washington's coast and turning our region into a thoroughfare for crude oil transportation by rail and oil tanker. We cannot afford these risks in these waters and water sheds.
Response: Comment acknowledged.	
Frost, Veer	It's time to end the oil train threat.
Response: Comment acknowledged.	
Fry, Mandee	Please don't expose the Grays Harbor and surrounding areas to the significant risks associated with the proposal. As a property owner in Grays Harbor, I know first hand the areas lack of infrastructure of fire and other emergency services. Even the smallest spill or other event, which would not be cause for alarm in other areas, would be devastating to the Grays Harbor area environmentally and economically. As an area that's economy is rooted in tourism, they would never recover. Please reject this and any other proposal to build oil terminals in Grays Harbor.
Response: Comment acknowledged.	
Frye, Ellen	The one thing we humans are good at is trashing the earth!
Response: Comment acknowledged.	
Frymire, Jack	It's dirty money, dirtier even than a bribe, because it puts our cities at risk. Rail cars carrying volatile Bakken crude are exploding cigars on wheels. Just say no!
Response: Comment acknowledged.	
Fudge, Teresa	The article says it all: The proposed oil shipping terminals; the explosive, dangerous oil trains needed to feed them; and the continual parade of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of communities, the local economy, tribal culture, and our ocean and coastlines at risk. This is not the future we want.
Response: Comment acknowledged.	
Fudger, Maureen	STILL going after OIL??! IN 2016!!!? Can we possibly progress beyond The Flintstones generation?
Response: Comment acknowledged.	
Fujita, Sandra	Please reject toxic oil transport and terminals.
Response: Comment acknowledged.	
Fulcher, Pamela	Please do not allow the oil industry to further pollute the environment and threaten the health and safety of communities in the Northwest.
Response:	
Fulgenzi, Janet	I see transport trains on the rails here in Michigan and I see how old the train cars are ~ how rusty and worn . . . and I am very concerned about a train accident and the spill of crude oil on our lands, on our earth.
Response: Comment acknowledged.	
Fullerton, Barbara	Thank you for reading my letter.keep the waters clean and safe.
Response: Comment acknowledged.	

Commenter Name	Comment
Furtado, Michael	We should b taking steps to cut back on fossil fuel usage and encourage renewables.
Response: Comment acknowledged.	
G, T	Abuser's Apocalypse: https://youtu.be/oQK1TBOFoSQ
Response: Comment acknowledged.	
G., Randall	The wellbeing and safety of the common woman and man should take precedence over the "bottom line" of an energy companies' profits. Please do the right thing on this issue. Thank you.
Response: Comment acknowledged.	
Gaab, Donna	We owe it to our children and their children to turn down projects like Grays Harbor and put our focus on clean energy instead. We can do it!
Response: Comment acknowledged.	
Gaffney, Robin	This is simply not worth the risk.
Response: Comment acknowledged.	
Galanis, Tim	Do what's right. For the people and for the environment we share.
Response: Comment acknowledged.	
Gale, Kathleen	There are wind and solar options that should be explored for the best future of our environment. Please be proactive in protecting the earth for us and for future generations.
Response: Comment acknowledged.	
Gale, Michelle	This is a failed system. We need to move on to clean energy. Don't pollute the country and waste our funds on an antiquated system that desperately requires replacement.
Response: Comment acknowledged.	
Gallagher, Brendan	I'm a republican opposed to fossil fuels.
Response: Comment acknowledged.	
Gallagher, David	We need to support clean, safe and sustainable energy, and we need to do it now!
Response: Comment acknowledged.	
Galloway, Kathleen	It's about time we respected the earth.
Response: Comment acknowledged.	
Gannon, Elinor	We need to stop this to prevent spills in our area!
Response: Comment acknowledged.	
Gant, Juliet	This needs to stop before it is too late.
Response: Comment acknowledged.	
Garber, Barbara	Aren't these people going to be satisfied until they completely trash our safety and environment? Put a stop to their greediness putting us all in danger.
Response: Comment acknowledged.	
Garcia, Christy	Stop this please!
Response: Comment acknowledged.	
Garcia, Leah	Quit putting lives and our environment in danger! Enough is enough. Stand up to the oil industry for the sake of everyone and our environment!
Response: Comment acknowledged.	
Garcia, Mark	Please help expedite getting the U.S. on to a green energy economy. Thank you.
Response: Comment acknowledged.	
Garde, Carol	Please protect our communities from ecological disaster. Thank you.
Response: Comment acknowledged.	

Commenter Name	Comment
Gardner, Glenda	What kind of future are u making for our children and their children?
Response: Comment acknowledged.	
Gardner, Holly	It's so frustrating to keep pointing out the obvious.
Response: Comment acknowledged.	
Gardner, Kirk	NO! NO! and Hell No!
Response: Comment acknowledged.	
Gardner, Louise	Please do not enable the world's addiction to oil. If we know that it is wrong for the United States then it is also wrong for the rest of the world. You seem to be acting locally; please think globally. Thank you for reading my letter.
Response: Comment acknowledged.	
Garlena, Sharon	BAN oil bomb trains!
Response: Comment acknowledged.	
Garlock, Marie	Stop taking people's land and health away from them for your personal profit. This is America, not a tyrannical state (the two are supposedly different).
Response: Comment acknowledged.	
Garren, Christine	Running these trains down the Columbia River Gorge is beyond frightening. It's a nightmare waiting to happen. STOP!
Response: Comment acknowledged.	
Garrett, Desiree	Enough Casualties from Oil! No More!!
Response: Comment acknowledged.	
Garrett, Patty	Please do nothing to endanger our sea life.
Response: Comment acknowledged.	
Garrison, Ron	Our aged rail system and tanker cars are not safe. And export? How the hell does that make us energy independent?
Response: Comment acknowledged.	
Garton, Katie	Please protect our country's beautiful Pacific Northwest from the dangerous expansion of oil transport!
Response: Comment acknowledged.	
Gartrell, Dona	When countries like Saudi Arabia have announced they are planning on being all wind and solar powered in the next few years, I think it is time the USA stops being left behind by focusing on our support of the oil industry.
Response: Comment acknowledged.	
Garza, Nita	I would like to see the oil industry stopped once and for all. They surely do not care what happens to the environment, wildlife or communities, with their oil spills and pollution. As a registered voter, I would like you to stand up for a cleaner, heal
Response: Comment incomplete.	
Gates, Joanne	TWe've had some dangerous rollovers as of late. Time to replan a safer way to transport. hank you for reading my letter.
Response: Comment acknowledged.	
Gatlin, Wendy	Clean power-solar and wind. Why are we still risking slowly destroying our own habitat? Stupid....
Response: Comment acknowledged.	
Gau, John	Fossil fuel must be phased out for many reasons. We can't have the growing population of the developing world repeat the mistakes of the U.S. in energy usage. We must discourage domestic and foreign consumption.
Response: Comment acknowledged.	
Gauthier, Linda	I have been horrified to see the monstrous expansion of oil drilling and the push to export this substance, not to mention the disastrous explosions from train derailments. This has to be reined in.

Commenter Name	Comment
Response: Comment acknowledged.	
Gazzola, Linda	PLEASE STOP THE DEADLY EXPANSION OF OIL!!!!
Response: Comment acknowledged.	
Gecas, Cynthia	The very thought of this is sickening---and would literally be so if it is enacted. I don't believe we should support the oil industry in anyway; it's time to move FORWARD and eliminate our dependency on oil anyway! Nothing good comes from the oil compan
Response: Comment acknowledged.	
Geissner, Elizabeth	My state recently had 2 oil spills from train accidents....both affect our water systems. It is time to move to renewable energy and to end the dependency on oil the oil companies and stockholders support. Our Earth should be a priority, not stockholders accounts.
Response: Comment acknowledged.	
Gelina, Althea	Thank you for reading my letter. This is an issue that means a great deal to me.
Response: Comment acknowledged.	
Gelpi, Barbara	I feel strongly that we should discourage "dirty" energy and encourage clean energy with public policy to save our environment for future generations.
Response: Comment acknowledged.	
Gent, David	Clearly there are benefits to having access to oil in the U.S. Just like any other decision, however, you have to weight the costs, benefits, and risks. In this situation, it is clear that the costs and risks heavily outweigh the benefits. Please, for once, do what is right for the good of all people and living creatures. Thank you for reading my letter.
Response: Comment acknowledged.	
Gentry, Rita	We're counting on you to make our nation's land, waters, and communities safe from oil. Please stop the trains!
Response: Comment acknowledged.	
George, Daniel	As a nation we should be focusing changes in our infrastructure to accommodate expansion of renewable energy resources, not continued construction of more and more fossil fuel oriented transport.
Response: Comment acknowledged.	
Georgieff, Iris	Stop the expansion of the polluters for profit and save our Eden, (the Planet), we are the care takers of these beautiful lands and the life sustaining waterways. Wake up America. Let us be the true leaders in world and look to other ways for a safe clean energy future. Stop destruction of our world. There are any good, safe, and clean alternatives, lets start implementing the already known-how-to.
Response: Comment acknowledged.	
Geraci, Suzanne	Not in Oregon! Not ANYWHERE!
Response: Comment acknowledged.	
Ghidoni, Don	It's become like having an asphalt driveway in summer and white carpets in my home.
Response: Comment acknowledged.	
Gholson, Kirsti	The risk of spill is too great. Too destructive. Enough, please.
Response: Comment acknowledged.	
Gia Del Campo, Sarah	How many more huge explosions will we have to see before we wise up about the danger to our communities that the trains pose?
Response: Comment acknowledged.	
Giaccardo, Diana	You people can no longer expose Mother Earth to your inconsiderate ways and destruction. ENOUGH. YOU WILL BE STOPPED.
Response: Comment acknowledged.	
Giblin, Dolores	Thank you for reading my letter. I would not sign this message if oil were our only option for powering our transportation, etc., but there are other options that are eco-friendly. I'll sign FOR them.

Commenter Name	Comment
Response: Comment acknowledged.	
Gibson, Claudia	We need to step back and rethink the impact on our planet from the serious pollution destroying our invaluable natural resources for BIG OIL, They have to be stopped . Capitalists have to be controlled because they won't stop for a greater good. They exercise greed to almost biblical proportions! Seemingly completely lacking ethics and conscience. It's disgusting to think how morally corrup the wealthy elite are. Ripe for a dramatic fall.
Response: Comment acknowledged.	
Gibson, Elizabeth	Keep Idaho beautiful
Response: Comment acknowledged.	
Gibson, Michael	Stop the dangerous expansion of oil
Response: Comment acknowledged.	
Giddings, Steven	Please help move us away from fossil fuel use.
Response: Comment acknowledged.	
Gies, William	The USA must take the long view. A view based on high value uses, not short term profit. Leave oil in the ground. At the very lest, leave it in the ground until high value use with in the USA becomes necessary. Thank you for reading my letter.
Response: Comment acknowledged.	
Giesy, Theo	It is time to move away from fossil fuels to clean renewable energy. We must not build any more infrastructure for fossil fuel sales. We must not subject our communities to the pollution and danger of fossil fuel transportation. Please do not allow thes
Response: Comment acknowledged.	
Gifford, Martha	This issue concerns me greatly even though I do not live in Washington State. I am a visitor there, and in both my home state of New York and in Maine where I live for part of the year, the threats from this type of oil transportation are very real. Tha
Response: Comment acknowledged.	
Gigear, Jonathan	Thank you very much for reading my letter- it is appreciated.
Response: Comment acknowledged.	
Gilbert, David	There is no reason to send crude oil through the NY metropolitan area endangering the millions who live here. The oil is being sent overseas and has no benefit for Americans. Besides the pollution carbon based fuel causes should no longer be tolerated i
Response: Comment incomplete.	
Gilkinson, Julie	I have a toddler grandson out in the Pacific Northwest and I am very concerned about preserving the earth for him to be able to learn about and enjoy! Thank you for reading my letter.
Response: Comment acknowledged.	
Gillespie, Jenny	We must finally come to terms with the fact that exporting oil and gas harms communities and our environment.
Response: Comment acknowledged.	
Gillespie, Karen	why do you make pipe lines to help people that are having a shortage with water get water to their crops and to the people not for lawns but for drinking and washing and cooking showering.
Response: Comment acknowledged.	
Gilligan, Ainslie	We live in a frightening time--the last thing we need is more oil exported overseas to fuel climate change.
Response: Comment acknowledged.	
Gillis, Mary Ann	don't be stupid. The world is moving away from fossil fuels. why was money and increase the risk of MORE devastation from spills. Big oil is on the way out. Get with the program. Oh wait, that's right. You are bought and paid for by big oil.

Commenter Name	Comment
Response: Comment acknowledged.	
Gilpin, Kathlyn	I am fed up with our focus on oil as the only energy source. It is high time we seriously work toward the use of CLEAN renewable energy sources!
Response: Comment acknowledged.	
Gioseffi, Daniela	THe days of big oil and oil transpost MUST END. Climate Crisis EMERGENCY is upon us. Crude oil transport is dangerous and deadly. Stop terminals at Grays Harbor, Wash. and protect our country from increased crude oild rail traffic and oil spills and carbo
Response: Comment incomplete.	
Giraldez, Javier	Take the step and stop them. We need more electrical vehicles not petroleum suckers!
Response: Comment acknowledged.	
Givers, David	ND regulators claim that their 13.7 psi vapor pressure standard makes Bakken oil safer. However, the volatiles in Bakken shipments remain the same as before and that is the danger for people living within a half mile of railroad shipments.Texas reduces th
Response: Comment incomplete.	
Glackin, Joseph	Tar sands must stay in the ground! Canada's First Nation People have refused the destruction of their lands with tar sands pipelines. We must join with them.
Response: Comment acknowledged.	
Gladysz, James	let them use there country for tranportation of oil
Response: Comment acknowledged.	
Glait, Susan	i have many family members who reside in Canada, and this expansion has major risks in both countries. Isn't it time to use renewable resources such as solar, wave and wind? We deserve better than to make oil companies richer at our health's expense. Tha
Response: Comment acknowledged.	
Glassco, Lisa	Please do not build more oil shipping terminals. We should be moving away from fossil fuels to sustainable methods of creating energy. You know that shipping or driving oil is dangerous. Let's just move on to better methods. Thank you,
Response: Comment acknowledged.	
Glasscock, Rita	This is TOO DANGEROUS !!!!!
Response: Comment acknowledged.	
Glassman, Joy	We cannot afford an oil spill. Have we not yet learned that transporting oil is risky. Let's protect our environment and meet our energy needs in better ways...
Response: Comment acknowledged.	
Glaub, Karen	Thank you for reading my letter. Please do not allow the rail transport through our country of this highly flammable material. There is no real benefit to America when these jobs are mostly temporary.
Response: Comment acknowledged.	
Glennie, Janice	Being energy self-sufficient shouldn't include destroying our own back yard. thank you.
Response: Comment acknowledged.	
Glover, John	We should nor be shipping domestic crude at all.
Response: Comment acknowledged.	
Glynn, Ann	There have been numerous failures in shipping, pipelines, trains and other aspects of oil and coal production and transport. People are killed, environments soiled. The present technology does not protect us. The financial gain is just not worth the degradation on the state.
Response: Comment acknowledged.	
Goddard, Tom	Please, Do not put profit over nature. Thank You.
Response: Comment acknowledged.	
Godinez, Robert	Please do not allow this plan by greedy and corrupt oil companies to proceed. Let's not destroy any more of our lands and water ways to benefit just a few. Thank you for reading my letter.

Commenter Name	Comment
Response: Comment acknowledged.	
Goeckermann, John	DON'T BE STUPID!DON'T SELL US OUT!!!!!!!!!
Response: Comment acknowledged.	
Goeppner, Paul	DO The. PIPIE line
Response: Comment acknowledged.	
Goertz, Katherine	Until oil companies can guarantee responsibility in transporting oil, I oppose the transport by rail AND BY WATER!!!
Response: Comment acknowledged.	
Goldsmith, David	NO MORE FOSSIL CARBON, PERIOD!
Response: Comment acknowledged.	
Goldsmith, Gail	it's time to act on the momentum of the Keystone rejection
Response: Comment acknowledged.	
Goldwyn, Lisa	Those who support oil as energy are short-sighted and obviously do not care about climate change and the destruction of the planet from drilling and transporting oil. Our resources need to be spent on alternative energy that does not harm our planet and its inhabitants.
Response: Comment acknowledged.	
Golonka, Hm, Sister Maryann	When will the people of this nation learn that if we stand together, we can make a difference! Money isn't everything, especially if the earth, our home is destroyed in the name of progress and exploitation. People and the environment are our greatest as
Response: Comment acknowledged.	
Gomolka, John	The time is NOW to start to get away from oil.
Response: Comment acknowledged.	
Gonzales, Joe	OUR PLANET IS BURNING!!! HISTORY WILL REMEMBER THOSE WHO DID NOTHING.
Response: Comment acknowledged.	
Good, Albert	As a civil/environmental Professional Engineer who has been responsible for mitigating risks from transport of radioactive and hazardous wastes for the US Department of Energy, I understand the hazards of transport of volatile, liquid waste. Those hazards
Response: Comment incomplete.	
Good, Carolyn	Please leave the health and beauty, not to mention the safety of so very many in Oregon unthreatened by your oil transport.
Response: Comment acknowledged.	
Good, Marjorie	Thank you for reading my letter. Fossil fuels are are a major source of carbon pollution that threatens planet earth. In the grand scheme of things the dangers presented by it's transport and use far outweigh any benefit to our country or the world. This
Response: Comment acknowledged.	
Goode, Rima	It's time to spend tax-payer dollars on safe, sustainable energy resources such as solar, wind and hydro power.
Response: Comment acknowledged.	
Gooding, Paula	Please do not allow oil to use our lands to travel through the state of Washington. We will find alternative energy sources that will prove economically viable while saving our environment.
Response: Comment acknowledged.	
Goodnight, Cecelia	We should not be providing fuel to other countries that add to the world's carbon pollution.
Response: Comment acknowledged.	
Goodwin, Kathy	Don't spill that dirty oil all over our fragil lands and waters! Why aren't the people listened to?! We don't want these disasters in Oregon!

Commenter Name	Comment
Response: Comment acknowledged.	
Gopinathan, Narayan	Fossil fuels are destroying our planet. By rejecting this oil shipping terminal, Grays Harbor has the opportunity to keep more oil in the ground and limit the dangerous buildup of carbon in our atmosphere that is acidifying our oceans.
Response: Comment acknowledged.	
Gordon, Hope	Sir or Madam, it doesn't matter whether it's in my back yard or not. IT"'S ALL PLANET EARTH and WE ALL SHARE IT. This is no way to treat Planet Earth, our home, and ourselves. Please stop this for your grandchildren, if no one else. It might be a revelation, I don't know, but aren't they more important than the shareholders? Thank you for reading my letter.
Response: Comment acknowledged.	
Gordon, Jessie	It looks to me as if we now can make the kind of choices that will determine our future: profit and 'progress' or continue to ruin the lives of ourselves, our kids and their kids. There are short and long term consequences to your decision.
Response: Comment acknowledged.	
Gordon, Shelley	Promote healthier energy. Do not let unhelthy oil threaten ecosystems. Begin this centuty of health by saying NO to dirty, risky oil transport.
Response: Comment acknowledged.	
Gordon-brown, Deborah	Thank you for reading the letter. I a so distressed by the general abuse of what is left of our ecology, our clean air, our free lands, our wild life, that I despair. Please, read the petitions, take actions. Our human lives are killing non-human life
Response: Comment acknowledged.	
Gorman, Tresa	Too much risk and too little reward. Time to move away from fossil fuels and toward clean, renewable sources to meet our energy needs and respond to global warming. Thank you.
Response: Comment acknowledged.	
Gosling, Sarah	The world needs to move to a low carbon future .. that means reducing oil production world wide .. the USA could take a lead it wasn't for politicians being owned by big oil.
Response: Comment acknowledged.	
Gossard, Chris	It's time to kick the petroleum habit for our energy needs. Also, we can't afford an oil spill in the salish sea.
Response: Comment acknowledged.	
Gottschalk, Eileen	We don't want this stuff anywhere! Wake up to the realities of climate change and to the desires of the American people.
Response: Comment acknowledged.	
Gough, Rip	I look at the Pacific NW and think how for centuries the Native Americans were able to thrive without destroying the land which supports them. In under 300 years we seem intent on destroying this country for the profits of a few. It NEEDS to stop.
Response: Comment acknowledged.	
Gouker, Patti	Please keep our cities and states safe and free from oil spills
Response: Comment acknowledged.	
Gourley, Christine	This presents too great of a risk to our harbor, rivers. It's not worth it. The economic gain would not be that great.
Response: Comment acknowledged.	
Gowan, Mark	Pathetic!
Response: Comment acknowledged.	
Grace, Kathryn	This is not my "region" but environmental dangers anywhere are dangerous for all of us everywhere.
Response: Comment acknowledged.	

Commenter Name	Comment
Grad, Brian	These transshipment projects will benefit very few people but pose a very serious environmental threat. Who will pay for the degradation caused by polluition? The Railroads resist even moderate proposals for safety. Insurance companies won't take the ri
Response: Comment acknowledged.	
Graffagnino, Mary Ann And Frank	PLEASE TAKE THE RIGHT, FAIR JUST HUMANE AND HEALTHY ACTION AND STOP THE DANGEROUS EXPANSION OF OIL TRANSPORT IN OUR STATE.
Response: Comment acknowledged.	
Graham, Daniel	It is time to redirect our financial resources to alternative energy development. There are no safe fossil fuels and to continue to invest in this infrastructure is foolish.
Response: Comment acknowledged.	
Grajales, Tanya	Please! Save the future of our kids
Response: Comment acknowledged.	
Grant, Charlene	This is not the time to endanger our people or our environment.
Response: Comment acknowledged.	
Grant, Jill	I have two RR crossings that I go over regularly. I can hear the train whistle at night from my house. I frequently wonder what's going down the tracks and pray it's something safe!
Response: Comment acknowledged.	
Grant-Endsley, Fiona	No crude oil through my Country!
Response: Comment acknowledged.	
Grass, Rick	Save one of my favoite towns .. and all the areas along the rail lines from the source to the coast
Response: Comment acknowledged.	
Grattan, Kim	Please don't allow greed to jeopardize the future of our country and our world. We already know that fossil fuel is a finite resource so we should put our efforts into finding new resources instead of polluting the air and water and soil trying to suck ou
Response: Comment incomplete.	
Graves, Royal	Stop Oil transport. Ship and implement Solar solutions.
Response: Comment acknowledged.	
Gravning-Fitzgerald, Sheryl	This is not the future WE want. Resources should be used for cleaner more efficient 'energies' that are neutral or beneficial for ALL on planet Earth - WE know they exist. Stop wasting time, energy and resources on an archaic form of energy - WE are bet
Response: Comment incomplete.	
Gray, Beverly	Special interest corporate greed is destroying our planet: one species, one echo system and one geographical region at a time. We need to stop this insanity now.
Response: Comment acknowledged.	
Gray, Carol	Trains of tank cars pass our house on the railroad every day, and every time I see them I fear for our safety.
Response: Comment acknowledged.	
Gray, Glenna	Do not ruin the beautiful Pacific Northwest with oil terminals. The time has come for the move to renewable energy.
Response: Comment acknowledged.	
Gray, Laura	Climate Chaos is costly, and we just cant afford to bear the costs to our health and our homes any longer, just so a few people can get rich. Let us go after the irresponsible fossil fuel companies who have delayed action with their deceptive and unethic
Response: Comment incomplete.	

Commenter Name	Comment
Gray, Marjorie	Thank you for reading my letter. My daughter and three grandsons live in Oregon. Here in Maryland we have Cove Point. Please do all you can to stop polluting water, air, soil and destroying our health and economy!
Response: Comment acknowledged.	
Greaver, Holly	We have one earth, let's not destroy it.
Response: Comment acknowledged.	
Greaves, Donald	To Whom It May Concern, Since I am not fully informed of all the facts on this issue, unless we are going Solar or some other type other Energy Producing Source that is both Ecological and Earth Species Save. This Petition is noteworthy of going nowhere f
Response: Comment acknowledged.	
Green, Catherine	Thank you for reading my letter. The one question that keeps coming up to me is, if everything to do with Canadian oil and it's shipping is so safe and high tech, why is Canada not doing it in Canada. The Alberta province and it's residents make a profit,
Response: Comment acknowledged.	
Green, Dorie	Living in Montana has let me see first hand how destructive shilling dirty energy is!
Response: Comment acknowledged.	
Greenawalt, Bob	I oppose any expansion of oil operations that will expose Oregonians to dangerous oil spills. We need more renewable energy, not crude oil.
Response: Comment acknowledged.	
Greene, Michael A	We have seen too many disasters from oil spills wrecking our environment for decades while they disrupt the lives of the communities these tragedies create. We can't afford these risky practices.
Response: Comment acknowledged.	
Greene, Terri	It's time to stop spending money on oil and direct our spending and energies to create alternate, environmentally friendly energy sources and lifestyles.
Response: Comment acknowledged.	
Greenfield, Margaret H.	The hazardous risks we would face with these oil industry proposals to expand oil transportation would cause great environmental damage.
Response: Comment acknowledged.	
Greenfield, Paul	Leave the crude in the ground. Climate change is real and it IS the single greatest threat to the future of this planet
Response: Comment acknowledged.	
Gregg, Brandon	Keep the waters off the Washington coast clean. Transporting oil creates spills, off-venting and the danger of crashes.
Response: Comment acknowledged.	
Gregg, Carolyn	I know that Grays Harbor needs jobs, but not at the risk that these terminals bring!
Response: Comment acknowledged.	
Gregg, Paul	In Wisconsin, we have just had two derail spills in the space of 3 days! This is insane.
Response: Comment acknowledged.	
Gregory, Anne	No!
Response: Comment acknowledged.	
Gregory, Barbara	I don't want more oil going through our communities. The tiny chance that there could be an explosion is too big a chance to take. Plus, we should leave oil in the ground and develop renewable energy.
Response: Comment acknowledged.	
Gregory, Brian	Protect us from the environmental insult that will result from the expansion.
Response: Comment acknowledged.	

Commenter Name	Comment
Greig, Laurie	Please protect our state and the environment of the entire planet. The proposed oil shipping terminals only will cause potential damage to the health and safety of the environment and our children, with nothing to say for the adults on the planet.
Response: Comment acknowledged.	
Gresham, Mary	Thank you for reading my letter. We need to keep our lands and waters free of spilled petroleum products. No to their transportation through risky methods and places.
Response: Comment acknowledged.	
Griesi, Linda	Very disgusting to even think that such an action would be good for the American people, it would only be good for BIG OIL!hank you for reading my letter.
Response: Comment acknowledged.	
Griffin, Amy	The environmental risks involved in transporting crude oil unnecessarily are simply too great, never mind the contribution the burning of these fuels would make to climate change. Thank you for reading my letter.
Response: Comment acknowledged.	
Griffin, Edith	Keep that oil in the ground, please! I oppose the building of export oil terminals in our port cities.
Response: Comment acknowledged.	
Griffin, Maryiam	I will make this short and to the point. Pollution will lead to many different species extinction including our own.
Response: Comment acknowledged.	
Grimes, Arlene	Our 'disaster teams' aren't even aware of what is being transported through our cities and towns. How would they begin to mitigate a spill???
Response: Comment acknowledged.	
Grimm, Sherry	Fix the problem NOW!
Response: Comment acknowledged.	
Grindle, Russell	The safety of my home is threatened by the track degradation caused by the massive weights of these trains. The tracks were not designed for this intense use.
Response: Comment acknowledged.	
Grmon, Toni	THIS MUST BE STOPPED !!!NOW !!!!!
Response: Comment acknowledged.	
Groeger, Tim	Fossil fuels are so 19th Century!
Response: Comment acknowledged.	
Groh, Paul	First and foremost stand up for your taxpaying constituency! QUIT BEING a finger puppet or lackey for big business, PERIOD!! Do the right thing for the people!!
Response: Comment acknowledged.	
Grohoski, Jacqueline	We had a train blow up on the Canadian border near our state. Dangerous in transport and dangerous when burned. No More
Response: Comment acknowledged.	
Groo, Carol	The devestating environmental costs of using fossil fuels are rarely considered in the profit/loss equation. Especially when we are talking about smoothing the way for exports. That is all about short term profits. The risks greatly outweigh the benefits.
Response: Comment acknowledged.	
Groom, Jimmie	Are you trying to circumvent the Keystone Pipeline XL???? We don't want that and we don't want this either!!!!! Keep your stinking oil!!!!!!!
Response: Comment acknowledged.	
Gross, Barbara	Please do what is right to protect the environment,not only of Grays Harbor but of the rest of our country (and world) due to the impacts of climate change from increased fossil fuel use as well as the direct impacts from mining and transportation.
Response: Comment acknowledged.	

Commenter Name	Comment
Gross, Todd	This is a no-brainer, unless you are a greedy Republican.
Response: Comment acknowledged.	
Grosshans, Katherine	We simply must begin to make the hard political decisions to begin our turn away from our centuries old fossil fuel dependence, and investments in that dependence, and increase our turn to investing in other sources less hurtful to the earth for our energy. Yes, this may perhaps initially be more expensive but we have never actually paid the true costs, especially environmental, of our oil and gas energy sources.
Response: Comment acknowledged.	
Grossman, Cynthia	We must become better care-takers of our planet and all of her inhabitants. Thank you for reading my letter.
Response: Comment acknowledged.	
Grossman, Mark	Oil trains are rolling bombs. Keep it off the rails and in the ground.
Response: Comment acknowledged.	
Groth, Lorie	There are better alternatives than oil - let's start to use them!
Response: Comment acknowledged.	
Grotzky, Marilyn	Instead of encouraging building related to the fossil fuel that threatens the future of life on the planet, we need to put our resources into developing appropriate and sustainable energy.
Response: Comment acknowledged.	
Grubba, Rosemarie	PLEASE don't let America become some apocalyptic version of herself with industrial gloom overhanging her! Thank you for reading my letter.
Response: Comment acknowledged.	
Grunbaum, Arthur	The only action that will assure proper mitigation is avoidance. Deny the permits.
Response: Comment acknowledged.	
Grundy, Marty	Thank you for reading my letter and realizing that this country must lead the world in moving away from fossil fuels. We have plenty of good opportunities in this great nation to build solar infrastructure on a large number of private homes. This will pr
Response: Comment acknowledged.	
Grunwell, Margaret	Haven't we shown that we aren't ready to accept the responsibility of all the wildlife we destroy in our need for money? We already have the gulf still leaking oil into the water that will never be stopped, now think of what damage we will do above groun
Response: Comment acknowledged.	
Gruszecki, Andrea	we should be reducing our dependence on oil, not increasing our infrastructure to accomodate it.
Response: Comment acknowledged.	
Gruver, Barbara	We want to use less oil, not make it easier to have more oil and more spills.
Response: Comment acknowledged.	
Grysko, Deborah	No more pipelines through peoples' homes. Pipelines are NEVER EVER SAFE! They help wealthy oil companies and no one else. We want healthy land and air for my children and gerund children!
Response: Comment acknowledged.	
Gugerty, Joan	We need to stop the insanity. We must wake up and see that it is time to ween ourselves from oil. It makes no sense; we don't need it. The fossil fuel companies need to wake up as well and jump on the green wagon or they will be left behind.
Response: Comment acknowledged.	
Gulick, Amy	If we are truly going to transition away from dirty fossils to clean renewable energy, then we cannot be building new infrastructure to transport dirty energy. How about using all of that money to instead build infrastructure for a clean, carbon-free future?

Commenter Name	Comment
Response: Comment acknowledged.	
Gump, Thomas	The proposed oil shipping terminals; the explosive, dangerous oil trains needed to feed them; and the continual parade of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of communities, the local economy
Response: Comment incomplete.	
Gundersen, John	If there is spillage of oil, the environment will suffer tremendously. Guess who will have to clean up the mess?
Response: Refer to the Master Response for Liability and Responsibility for Incidents.	
Gunning, John	Stop the dangerous expansion of crude oil transport and export terminals now.
Response: Comment acknowledged.	
Gustafson, Jeffrey	Its time to stop saying yes to everything the oil industry asks. We must break form fossil fuels and stop subsidizing and cuddling the oil industry. And if this state is serious about curtailing carbon pollution we must stop the unsafe shipment of tar sand oil on our rails and through our ports.
Response: Comment acknowledged.	
Guthrie, Amanda	We do not need this expansion. Thank you for listening!
Response: Comment acknowledged.	
Guzman, Jose	Read My Stuff!
Response: Comment acknowledged.	
Gwiazda, Henry	At this time of profound Climate Change and Threat caused by accumulated fossil fuels, we should not be endangering a coastal community, its environment, and humanities future for the short term gain of the special interests of the oil companies.
Response: Comment acknowledged.	
Gx, Perry	Thank you for reading my letter.This Is WRONG!!!
Response: Comment acknowledged.	
Haas, Irene	We don't need our beautiful part of the country destroyed to satisfy the greed of oil companies!
Response: Comment acknowledged.	
Hadcroft, James K	Thank you for reading my letter. I am a Veteran, Active Voter and TaxPayer. As a Veteran I put my life on the line for Democracy. This missive is Democracy in action. It is time to stop the plutocratic take over and save American Democracy and the middle
Response: Comment acknowledged.	
Hadderman, Margaret	Thank you for reading my letter. Oil is a fading, even dangerous resource to depend on. Renewables investments should be the face of the future!
Response: Comment acknowledged.	
Haendiges, Donald	Oil transport via tanker or pipeline is a very dangerous proposition and too much a gamble for the population.
Response: Comment acknowledged.	
Haffa, Dee	There has to be better transporting methods OR BETTER transporting methods new to be found! Our communities need not be placed in such a risk for the profits of oil companies.
Response: Comment acknowledged.	
Hafrey, A	Let's safeguard our marine habitat, which enhances the health, safety and economic livelihood, instead of risking it with the dangerous expansion of oil transports.
Response: Comment acknowledged.	
Hague, William	if big oil needs our rail system, it should be incumbent on them to bring it up to safe standards. we honestly should be ashamed by the condition of our rails anyway.
Response: Comment acknowledged.	
Haladjian, Krikor	Invest in solar energy and wind energy!!!

Commenter Name	Comment
Response: Comment acknowledged.	
Halberstadt, Carol	Our Earth has a fever, caused by fossil fuel extraction and burning. We cannot stop what is underway, but we must end all fossil fuel use, leave it all in the ground and untouched in the oceans of the world, if there is to be a future for life on our planet. Today, the KXL pipeline was rejected, ended. A few weeks ago Shell gave up its reckless and futile attempts to drill in the Arctic, and their licenses were not renewed. I call now on the Washington state Dept. of Ecology and city of Hoquiam to do the only right thing and block and deny any proposed oil transportation shipping terminals, now and forever. We must all work to transition asap to renewables only, which we can do. If our species heals itself, the Earth will also heal. We must all work to make the right choices for life, and for Washington state and the Northwest and city of Hoquiam it means no crude oil transportation by rail and oil tanker. With hope for life on Earth and the Earth who sustains us all.
Response: Comment acknowledged.	
Hale, Leona	Thank you for reading my letter. It seems like every time I turn around some big environmental and health issue raises it's very ugly head-again and again. These folks with money-they seem to feel they have all the control and rights and, we, the people,
Response: Comment acknowledged.	
Hale, Luanna	Thank you for reading my letter. The future of energy is not in oil. We MUST have cleaner energy. Let's think about our children, our grandchildren, and our great grandchildren. They are more important that profits!
Response: Comment acknowledged.	
Haley, Michael	please don't let our lands be used to transport Canada's dirty oil.
Response: Comment acknowledged.	
Hall, Adriana	I care about our planet! Lets go solar and never destroy our planet again!
Response: Comment acknowledged.	
Hall, Camille	I urge you to deny permits for the two oil terminals proposed for Grays Harbor. A clean maritime environment is essential to the livelihoods of many people in and around Grays Harbor. It is unjust to approve actions by outside corporations which will jeo
Response: Comment incomplete.	
Hall, Carmin	I think that we are past using fossil fuels, they clearly destroy the environment and it's outdated.
Response: Comment acknowledged.	
Hall, Carol	It is a grave mistake to put the safety of the people and environment at great risk by building these terminals.
Response: Comment acknowledged.	
Hall, Gudrun	...we need to remind people about that derailment fire in Canada last year...we ought to bring out this particular tragedy each and every time we talk about transporting dirty oil.
Response: Comment acknowledged.	
Hall, Henry	Enough! Stop trying to kill the planet for your own profit.
Response: Comment acknowledged.	
Hall, Jane	Support protection of Grays Harbor and its people. Reject the proposed oil terminals. These terminals and the destruction they bring is the wrong way to meet today's energy needs.
Response: Comment acknowledged.	
Hall, Robert	I support Washington's decision, and hope they see clearly the danger transportation of crude oil represents. Our rail system was not built for this kind of traffic. Thank you for reading my letter.
Response: Comment acknowledged.	
Hall, Rose	Crude oil is toxic. The planet can only support healthy initiatives if people continue to populate it. The oil and gas industry is toxic. It must be replaced with renewable energy.
Response: Comment acknowledged.	
Halligan, Michele	Please put the earth and the children first and reject the oil terminals in Grays Harbor. We must find better ways to live on this planet, our only home. Thank-you

Commenter Name	Comment
Response: Comment acknowledged.	
Hamilton, Patricia	Fossil fuels - out of date and a huge health risk for our state. Let's not encourage the destruction of our state and our citizen's lives and health
Response: Comment acknowledged.	
Hamilton, Terri	Oil spills are inevitable. Trust me...you will not like it when it happens. I have been there and seen the devastation on beaches, wildlife, communities and the citizens. Just pure misery. Everywhere. There are so many alternatives, and why they are ignor
Response: Comment acknowledged.	
Hammen, Kathy Hammen, Cambridge Wi	Why are the republicans hell bent on making our planet unliveable. Stop poisoning your people, animals, water and ground. Put your energy and votes toward cleaner energy. We have the technology now. USE IT!!!!!!!
Response: Comment acknowledged.	
Hammond, Anne	Fossil fuel is dangerous to the life of the whole planet. Concentrate, instead, on clean, safe renewables.
Response: Comment acknowledged.	
Hammond, Brenda	No more fossil fuels! Thank you for reading my letter.
Response: Comment acknowledged.	
Hammond, Don	Climate change is real and human-caused.
Response: Comment acknowledged.	
Hammond, Jay	Over and over again oil spills cause massive damage at the expense of the people and the environment where the spills occur. Oil is cheap and dirty. Continuing to enrich large corporations with dirty energy is insane, especially in light of current oil
Response: Comment incomplete.	
Hampton, Donna	Stop this potential disaster before we're just another oil-disaster story.
Response: Comment acknowledged.	
Hanin, James	Until the oil companies place the safety of the very people who use their products, those forms of rail and other transportation must stop.
Response: Comment acknowledged.	
Hannum, Jill	With Keystone XL stopped, it should be clear that we are (finally) moving away from the dangerous, destructive transport of hydrocarbons. The oil terminals will soon be obsolete. Don't build them.
Response: Comment acknowledged.	
Hansard, Thierry	Use the oil and gas at home! Less risk of offshore spills, lower transportation costs, we avoid further dependence on geopolitical hotspots. It seems a no brained to me...
Response: Comment acknowledged.	
Hansen, Arlene	Oil companies don't seem to learn from their mistakes! They have spills, messes that hurt our environment: land, sea, critters! No to the terminals! There is so much to lose when their mistakes keep happening!!! The wildlife is incredible up there! Crude tar sands is really dirty! So rail/trucking accidents? Messy & a killer to streams, or wherever spill happens! No pipeline! Please, no terminals!!
Response: Comment acknowledged.	
Hansen, Dawn	Please don't allow our state's waters to become an oil thoroughfare. No good can come of it!
Response: Comment acknowledged.	
Hansen, Jan	I have property in Grays Harbor and this would be a disaster!
Response: Comment acknowledged.	
Hansen, Robert	Washington is a beautiful state, and blessed with many wetland ecosystems. Oil spills are inevitable, and will put those wetlands in danger. I urge you to instead support clean energy.

Commenter Name	Comment
Response: Comment acknowledged.	
Hansen, Tami	NOW is the time to move away from fossil fuels, not increase it.
Response: Comment acknowledged.	
Hanser, Barbara	We have abundant evidence that oil companies are not responsible pArtners in protecting the environment. They cannot be trusted to take the right precautions lifeguarding against disastrous spill landmarks. Please do not allow the building of these termi
Response: Comment acknowledged.	
Hanson, Art	We MUST keep climate-changing fossil fuels in the ground!
Response: Comment acknowledged.	
Hanson, Mary	Oil needs to stay in the ground, not be transported through our communities, if we are to have a prayer of avoiding a climate catastrophe. We need to go full-out to switch to renewables, especially solar, creating lots of jobs as well.
Response: Comment acknowledged.	
Hanson, Natalie	We MUST keep climate-changing fossil fuels in the ground!
Response: Comment acknowledged.	
Hardman, Ann	People first, NOT profits.
Response: Comment acknowledged.	
Hardy, David	This needs to be stopped, now.
Response: Comment acknowledged.	
Harlib, Amy	Thank you for reading my letter. END OIL! ASAP SWITCH TO USED COOKING OIL, SOLAR, WIND AND TIDAL POWER FOR ENERGY!
Response: Comment acknowledged.	
Harlow, Batya	Too many trains derail. Please don't allow oil trains.
Response: Comment acknowledged.	
Harmer, Jill	We need to keep the oil in the ground or the carbon pollution will reach even more dangerous levels.
Response: Comment acknowledged.	
Harmon, Terry W. & Elaine C.	Thank you for reading our letter, because we want you to remember the aftermath of the derailment of a train carrying Bakken crude oil, in the Quebec town of Lac-Mégantic on July 6, 2013. 47 people were killed. FORTY SEVEN innocents whom you will be responsible for if you do not make the right choice[s]. You must face reality.
Response: Comment acknowledged.	
Harp, Carole	It's time to channel our resources toward clean energy solutions and stop increasing the risk to our already endangered precious water ways.
Response: Comment acknowledged.	
Harr, Silva	We do not want this!
Response: Comment acknowledged.	
Harrington, Michael	we don't need it
Response: Comment acknowledged.	
Harrington, Nancy	Expansion of major pollution sources that jeopardize safety and the environment should be reduced not expanded. Keep it in the ground!
Response: Comment acknowledged.	
Harris, B.L.	Thank you for reading my letter. Please do not allow the U.S. to become an oil transport line. By its nature oil is toxic. we should not allow one drop of it moved except for our own use. Even for use in the U.S., its movement should be limited. There is heavy risk whenever it is moved. We should not bear the burden for another country's use.
Response: Comment acknowledged.	

Commenter Name	Comment
Harris, Glenn	We do not need dirty and dangerous oil trains in Oregon. Oil is a pollutant.
Response: Comment acknowledged.	
Harris, Glenna	NO-O-O!!!!!!!
Response: Comment acknowledged.	
Harris, Mark	Stop the bomb trains.
Response: Comment acknowledged.	
Harris, Peggy	We don't need more dirty oil and we sure don't need our wonderful coasts ruined by terminals. STOP this madness! Thank you for reading my letter.
Response: Comment acknowledged.	
Harris, Penny	Everything comes down to money. Nothing comes down to simple common sense. We are killing the Planet along with ourselves. Brilliant
Response: Comment acknowledged.	
Harrison, John	Thank you for reading my letter. Remember that greed kills.
Response: Comment acknowledged.	
Harrison, Michael	Be a leader and stand against this plan that does not benefit the people of Washington state
Response: Comment acknowledged.	
Harrison, Rudy	Why not try harder to save our country rather than destroy it; is that asking to much????
Response: Comment acknowledged.	
Harrison, Wesley	The oil companies never pay for their mistakes and damages they cause, it always come back to the people. Wheather in cleaning up their mess or paying higher prices for their mistakes.
Response: Comment acknowledged.	
Hart, Sara	Oil spills are not a matter of if, but when.
Response: Comment acknowledged.	
Harter, Nancy	Please stop this potentially dangerous plan and protect WA
Response: Comment acknowledged.	
Hartford, Carolyn	This is a very stupid idea - if ever the risks outweighed the (minimal) benefits, this is such a case. Please say no to these dangerous proposals.
Response: Comment acknowledged.	
Hartley, James	The oil trains are extremely dangerous. We need to be concentrating on alternative energy sources, not expanding our use of fossil fuels.
Response: Comment acknowledged.	
Hartman Iii, George	Thank you for your consideration of my comments in opposition to the two terminals proposed for Grays Harbor, Washington.
Response: Comment acknowledged.	
Hartman, H Ronald	END OUR DEPENDENCE ON FOSSIL FUELS AND ALL THE METHODS NOW USED IN EXTRACTING, PROCESSING AND TRANSPORTING IT - PERIOD. GREEN RENEWABLE ENERGUY SOURCES FROM ALGAE AND OTHER SOURCES ARE NOW COMPETITIVE IN COST OF PRODUCTION WITH NONE OF THE DETRIMENTAL DANGERS OF DEEP DRILLING OFFSHORE AND FRACKING. YOU RE RUINING THE PLANET - NEEDLESSLY - FOR GREED IN YOUR REFUSAL TO MODERNIZE AND SCRAP OLD WAYS AND MEANS.
Response: Comment acknowledged.	
Hartnett, Patrick	Rail transport of crude oil, especially that derived from shale due to the VOC content, is inherently dangerous to both communities these trains pass through and for the environment. Thank you for reading my letter.
Response: Comment acknowledged.	
Hartung, Bridgette	Please consider making the right decisions about this issue.

Commenter Name	Comment
Response: Comment acknowledged.	
Harty, Florence	No one in this area wants your dirty crude traveling through here.
Response: Comment acknowledged.	
Harvey, Anne	Thank you for reading my letter. As a witness to and worker during the Macondo oil spill in 2010 I have seen the devastating effects of large scale oiling. We also suffer from jet fuel leaks when fuel is transported along the Intracoastal waterway.
Response: Comment acknowledged.	
Harvey, JO	Lets keep our state as the Evergreen State, not the Crude Export State.
Response: Comment acknowledged.	
Haskell, B	This is a huge waste of money when the money should be spent to install sustainable energy systems which will create more jobs.
Response: Comment acknowledged.	
Hastings, George	WE are tired of our environment being sold out for money. Don't let this happen.
Response: Comment acknowledged.	
Hatch, Susan	We need to stop expansion of oil. Oil is a dirty energy source that is destroying our oceans, from which at least 50% of our oxygen comes. It destroys shell fish, is starving other sea life, causing the oceans to rise, and destroying our very fabric of li
Response: Comment acknowledged.	
Hatsis, Elaina	More terminals means an increased crude oil rail traffic, oil spills and carbon pollution. This is not the future we want!
Response: Comment acknowledged.	
Hattman, Karen	Greed is not a reason to ruin the environment. Expansion of oil terminals will result in encase in environmental damage. STOP this proposal.
Response: Comment acknowledged.	
Hauck, Grant	Change can be ugly when it comes at the last second or takes its own actions
Response: Comment acknowledged.	
Hauer, Martha	This industry is a crime against humanity... shut it down.
Response: Comment acknowledged.	
Haugen, David	I thought we needed oil for United States not for exporting. Unnecessary risk are being increased with no value to US citizens.
Response: Comment acknowledged.	
Haver, Virginia	The Grays Harbor area is a great little vacation spot and wonderful for birding. This proposal by oil industry is not well thought out and poses risks we need not take in this special area.
Response: Comment acknowledged.	
Havrilla, Robert	It does not make sense to have a national policy to reduce oil usage in this country via CAFE standards and the Clean Power Plan but then turn around and ship the oil we are saving overseas for it to be burned there and thus negating our climate change ba
Response: Comment incomplete.	
Hawekotte, Jay	Please do the right thing for the long term and protect our future generations. Thank you for reading my letter.
Response: Comment acknowledged.	
Hawk, Martha And Lewis	no more oil trains no more terminals
Response: Comment acknowledged.	
Hawthorne, Tim And Leann	NO NO NO..... Stop endangering life on our Planet and inour community
Response: Comment acknowledged.	

Commenter Name	Comment
Hay, Gavin	Thank you for reading my letter. Save the planet Protect the environment Don't sacrifice the land we live on
Response: Comment acknowledged.	
Haydt, Marcy	Please help stop Global Warming.
Response: Comment acknowledged.	
Hayes, Brenda	We are running out of time to save the planet but each positive step, no matter how small in the world order, does really matter. Let us consider the future and act prudently.
Response: Comment acknowledged.	
Hayes, Kenneth	Thank you for reading my letter. The alarming safety record of oil trains means an explosive oil train derailment is not a question of if, but when. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains woul
Response: Comment incomplete.	
Hays, Petra	NO oil shipping terminals, no oil transportation by rail and/or tanker! There are too many risks and damage to the environment; our oceans, wildlife and coastlines. NO expansion of oil transport!
Response: Comment acknowledged.	
Hazard, Evan	WWJD?
Response: Comment acknowledged.	
Hazen, Roxanne	My family and future generations are counting on you to do the right thing.
Response: Comment acknowledged.	
He, Carolina	I strongly recommend you to sign this petition NOW!
Response: Comment acknowledged.	
Head, Marilyn	Let's try to leave a safe world for the children!
Response: Comment acknowledged.	
Heath-shepard, Holly	To Whom it Concerns: I am asking that you please seriously consider stopping the dangerous expansion of oil transportation. And, when I say seriously, what I mean is taking a good hard look at the facts, at issues that have plagued other countries during
Response: Comment acknowledged.	
Hebberger, Jo Anna	The risks are too great to allow transportation of oil products across the United States. Even if there are no accidents, the carbon dioxide and methane added to the atmosphere when these energy sources are used is unacceptable. Thank you for reading my
Response: Comment acknowledged.	
Hebley, S	Short-term energy production and profits are not justified at the expense of our future. We need to be able to leave a healthy planet to future generations.
Response: Comment acknowledged.	
Heckman, Tom	We need to set low a low global worldwide temperature rise at the up coming Paris summit. Fully fund a sustainable fund to enable less developed countries to skip fossil fueled industrialization and go directly to renewable energy. Halt fossil fuel devel
Response: Comment acknowledged.	
Hecox, Eric	We already have thousands of tankers coming through here we DON'T want, we sure as HELL don't want more!
Response: Comment acknowledged.	
Hegedus, Barbara	WE DON'T WANT OUR COUNTRY, ENVIRONMENT AND WILDLIFE TORN UP AND DESTROYED - FOR OVERSEAS OIL PROFITEERS! LET EUROPE AND THE MID-EAST DESTROY THEIR OWN NATIONS IF THEY ARE AS STUPID AS OUR POLITICIANS.
Response: Comment acknowledged.	
Heiman, Thomas	You know the terrible, proven dangers that such oil transport poses. Do the rational, careful and caring action here. Cancel those two oil terminals. Thank you for reading my letter.

Commenter Name	Comment
Response: Comment acknowledged.	
Heisel, Peggy	Transporting crude is far TOO RISKY.
Response: Comment acknowledged.	
Helm, Rachel	Thank you for reading my letter. Please invest in clean, renewable energy and end our country's addiction to oil. This year is the warmest in history, as was last year. Please strive to make our world inhabitable for our children and grandchildren. It is
Response: Comment incomplete.	
Helmholz, Sharron	The health of our planet and all those living on it are more important than the greed of the fossil fuel industry.
Response: Comment acknowledged.	
Hemp, Peter	Thank you for reading my letter. Show some spine. Do something good for our Homeland.....for a change.
Response: Comment acknowledged.	
Henault, Barbara	Washington is the most beautiful state. Please do not destroy it!!
Response: Comment acknowledged.	
Hendrell, Lynda	How many people have to die when these trains have accidents that cause explosions? Or how many more oil spills can America tolerate, ruining people's homes and towns? Not to mention, the filthy conditions present at every crude oil port and the waters around it? Please stop these terminals.
Response: Comment acknowledged.	
Hendricks, Judith	Thank you for reading my letter. Please stop the desecration of our planet by fossil fuel companies.
Response: Comment acknowledged.	
Hendricks, Susan	Thank you for reading my letter. We need to protect our Earth while we can. Be proactive instead of reactive. Do the right thing before you are forced to recover from a disaster!
Response: Comment acknowledged.	
Hendrickson, Jacquee	Thank you for reading my letter. This country has compromised itself to further the interests of our politicians, greedy corporations & foreign nations. Time to stop being caretakers of everyone else & beginto care for our country.
Response: Comment acknowledged.	
Henney, Kim	No more oil. We don't need it. We don't need the horrible consequences. WE WILL ADAPT - to clean energy.
Response: Comment acknowledged.	
Henrikson, Lars	In your evaluation, you need to consider the potential impacts of a derailment and spill or explosion along the entire route of travel, particularly the portion of the route between Olympia and Grays Harbor ports.
Response: Comment acknowledged.	
Herald, Robert	Living in the Portland, I do not feel comfortable with the idea that highly flammable oil may be transported through the center of our city - close to hundreds of thousands of people.
Response: Comment acknowledged.	
Herbert, Jonathan	Oil addiction kills
Response: Comment acknowledged.	
Herbert, Lauren	There are so many other constructive ways of improving the economy in Oregon. This is so damaging to the environment. We need to work away from petroleum to survive as a species. The change is hard, but we have to change.
Response: Comment acknowledged.	
Herbert, Mari	It is time to leave carbon sequestered in the ground and develop wind, solar, and hydro power.

Commenter Name	Comment
Response: Comment acknowledged.	
Herbert, Wendy	Please do not expand.
Response: Comment acknowledged.	
Herman, Allan	Fossil fuels have already caused catastrophic events. They will be the death of all of us. It is immoral to continue to provide ANY state support for the industry.
Response: Comment acknowledged.	
Hermonat, Kenneth	You and I know this is a form letter. Know that I support it 100%.
Response: Comment acknowledged.	
Herrero, Tara	Stop the dangerous expansion of oil transport.
Response: Comment acknowledged.	
Herrgesell, Ron	We, the people of New york state, must stand up to the transportation of dangerous cargoes anywhere in our state, and we have to act now!
Response: Comment acknowledged.	
Herrnstadt, Howard	Although it already may be too late, we must start immediately to re-direct our economy and energy use. The rail transport and ultimate exportation of crude oil is a step in the wrong direction.
Response: Comment acknowledged.	
Hershberger, Bryn	This is detrimental to our communities safety, health and culture. Please stop this from going forward.
Response: Comment acknowledged.	
Hesselmann, Patrick	We know that transporting oil is fraught with risks of accidents, fires and toxic spills. We know that the proposed routes through the Northwest, and the proposed shipping terminals on the Washington coast are invitations to disastrous spills. We know th
Response: Comment incomplete.	
Hestnes, Elizabeth	Please protect all living things from the possible pollution that this will bring, particularly to our need for clean water.
Response: Comment acknowledged.	
Hettich, Kathryn	Thank you for reading my letter and for re-considering the impact of the proposed export terminals to the coastal community of Grays Harbor in Washington.
Response: Comment acknowledged.	
Hewitt, Maev	It is long past time for America as a whole to move away from the short-term profits and ease of fossil fuels and to move NOW towards clean, renewable energy sources. This country must stop enabling purveyors of dirty, dangerous, non-renewable energy sour
Response: Comment incomplete.	
Hewson, Susie	short termism and corporate profit must never take precedence over the needs of the current populations and those of the future. The environment is not just a social wellness benefit but the Habitat in which living things must thrive. The oil industry in
Response: Comment incomplete.	
Hey, Jane	Thank you for reading my letter. Please don't allow the US become a money hungry country where fossil fuels are transported across the country to ports for export. Such transport will rob our country of valuable farmland due to more oil lines being installed and more train car explosions because they are substandard.
Response: Comment acknowledged.	
Hiestand, Nancy	Oil trains are a threat to humans and the environment. Please oppose expansion.
Response: Comment acknowledged.	
Higgins, Diane	Why would you risk the damage of a spill or worse, explosion, in your area? And why you would accept infrastructure that in 10 years will be underused or not used? Fossil fuels are hot now, but

Commenter Name	Comment
	the fracking wells peter out quickly, and in 10 years, many countries will be moving to renewables because it's cheap and non-poluting. Remember, an oil spill never gets completely cleaned up--the damage continues for decades. Please be forward thinking and do what's right for the people and the land.
Response: Comment acknowledged.	
Higgins, KA	This project sounds unsound environmentally. There better, less potentially polluting options for obtaining energy resources.
Response: Comment acknowledged.	
Higginson, Norman	Thank you for reading my letter. This is a form letter and I support its content
Response: Comment acknowledged.	
Hilf, Lawrence	The expansion of oil shipping terminals would put critical wildlife habitat at risk and increase the very real threat of oil spills. NO MORE OIL SPILLS!
Response: Comment acknowledged.	
Hill, Dawn	Just say "no" to another filthy oil industry project! Not in my country!
Response: Comment acknowledged.	
Hill, Jim	Please stop the proposed Grays Harbor oil terminals. Thank you for reading my letter.
Response: Comment acknowledged.	
Hillard, Joyce	Thank you for reading my letter. We have already experienced a pipeline rupture in my area. It devastated the land, animals, water and homeowners over a large area. The after-effects are still and will remain a serious problem even though Exxon "cleaned i
Response: Comment acknowledged.	
Hillberg, Mary	This is our home and our only earth. To destroy it for the profit of a few is beyond comprehension. There is no mitigation for petroleum spills in marine waters and "unfightable fires" leave our communities at great risk. There is no excuse for any vote approving this destructive action. Thank you for reading my letter.
Response: Comment acknowledged.	
Hills, JO	Oil trains and barges pass close by my home every day and night. I have a constant fear that they will destroy my home, my community, my health. It is just a question of when not if. Do not allow the expansion of this industry.
Response: Comment acknowledged.	
Hink, Sally	Thank you for reading my letter. The risk associated with expanded oil transport must be our nation's first consideration. Please stop the increased risk by NOT putting our people and the environment at even more risk. Thank you.
Response: Comment acknowledged.	
Hinton, Matthew	We should never be an oil exporter. We must move towards renewable energy.
Response: Comment acknowledged.	
Hirtle, John	It's time to get serious about transitioning to clean energy. Thank you for reading my letter.
Response: Comment acknowledged.	
Hodges-howell, Brenda	The future I want for my 2-year-old son is one that leans on creative, new technologies that use sustainable sources for energy. Continuing our reliance on oil is short-sited and irresponsible for our future generations.
Response: Comment acknowledged.	
Hodie, Jake	So many of our waters have already been ruined by development, drilling, pollution, and humans. Enough is enough! Our waters are supposed to be a place of peace and quiet for us, and the fish and wildlife which live in them! The animals are running out of
Response: Comment incomplete.	

Commenter Name	Comment
Hodnett, Robert	Their has been enough damage done to our environment already and need safer ways to transport the oil.
Response: Comment acknowledged.	
Hodovan, Francine	We cannot allow our precious earth to endure this kind of treatment any longer! Enough is already too much!!!
Response: Comment acknowledged.	
Hoekstra, Heather	Thank you for reading my letter and caring for the welfare of the people you represent.
Response: Comment acknowledged.	
Hoelscher, Joanna	Thank you for reading my letter. I am vehemently opposed to this project which carries such a significant risk of environmental harm.
Response: Comment acknowledged.	
Hof, Charles	1) the risk is too great 2) the expansion of petro chem for the profit of a few is short sighted 3) an "accident" will happen 4) it is a really bad idea, still!
Response: Comment acknowledged.	
Hoff, Ann	Thank you for reading my letter. I feel all new development should be on non-fossil fuels.
Response: Comment acknowledged.	
Hoff, Anne	Thank you for reading my letter. I am an avid birdwatcher concerned with protection of Gray's Harbor, a location where shorebirds congregate. A crude oil spill there would be even more disastrous than in other places. Ocean-going traffic and rail transp
Response: See Response to FL1-1.	
Hoffmann, Kathleen	The oil industry should not be allowed to ship volatile Bakken crude and toxic tar sands from Canada by rail through ANY community...increasing the risk of an oil spill, fire, or explosion and exporting global warming harm. This is not the future that we should be building.
Response: Comment acknowledged.	
Hoffmann, Randi	Thank you for reading my letter. We need to continue looking toward the future. Expand CLEAN and RENEWABLE energy sources. Big oil may think they are all-powerful and that they can continue to get away with murdering our Planet. We can show them they are
Response: Comment incomplete.	
Holbrook, Kim	Stop the oil industry now. Their greed is why they are denying climate change. they don't care about the safety of Americans, this country or protecting our planet and its biodiversity. Profits and greed is all the oil companies and their stock holders really care about.
Response: Comment acknowledged.	
Holden, Suzanne	Not in Grays Harbor or in my backyard either!
Response: Comment acknowledged.	
Holland, Dianna	PLEASE HELP US! Thank you for reading my letter.
Response: Comment acknowledged.	
Holland, Lauren	We recently have been made aware of the corrupt and unethical practices of the oil industry. It's time to stop their expansion until we have confidence in their practices and have considered the serious health, safety and environmental risk of their acti
Response: Comment acknowledged.	
Holland, Mervin	Don't let Big Oil turn Washington State into it's next big garbage can!!
Response: Comment acknowledged.	
Holland, Tanya	Please keep our communities and environment safe. Please reject these oil terminals.
Response: Comment acknowledged.	

Commenter Name	Comment
Holland-medanic, Kathy	When does it ever stop? More and more tearing up the beauty and health of our land for environmentally harmful crude oil transport! More and more harm to our already disappearing marine life! Haven't there been enough oil spills and resulting crises to show that theses proposed shipping terminals are not worth it. Enough! Thank you for reading my letter.
Response: Comment acknowledged.	
Holm, Mary	It's time to stop the killing of Earth! Oil is so OVER! Do NOT allow any more infrastructure to be built for this catastrophic industry. It's time to invest mightily in CLEAN energy!!
Response: Comment acknowledged.	
Holmbeck, J	Our country must change course now, and not continue to pursue the same old policies of pollution and degradation.
Response: Comment acknowledged.	
Holmes, Judith	NO, NO! NO!!!
Response: Comment acknowledged.	
Holmes, Lorna	We need to move to the future, green renewable energy, and stop building more of the past, which is fossil fuels.
Response: Comment acknowledged.	
Holmes, Stefanie	If the U.S. Is really going to be a climate leader, we should stop aiding and abetting the fossil fuel industry. Thank you for your consideration of this matter.
Response: Comment acknowledged.	
Holzrichter, Gail	Due to the risks of train derailments & spills, & damage to marine life if the Grays Harbor terminals get built, I urge you to consider the health of people in the area by denying permission to the oil companies who wish to build. thank you.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Holzwart, M	Don;t let us be turned into a highway for crude oil transport...Save out environment
Response: Comment acknowledged.	
Homenko, Deborah	It is time to move to the future. Oil is the past and is driven by greed. Our home is more important than continuing reckless pollution for the sake of profit.
Response: Comment acknowledged.	
Hoogstra, Don	Take away the subsidizes for oil and it does not make financial logic. Let us commit to a more financial, sustainable and environmental solution.
Response: Comment acknowledged.	
Hope, Angela	Please stop draining mother nature.....and hurting our environment with your crude behaviors....
Response: Comment acknowledged.	
Hopkins, Paul	Sales of electric cars are increasing worldwide. In Norway it is 17% of new car sales. We do not need any oil export terminals in this country. Instead of building something for today, it is better to plan for tomorrow.
Response: Comment acknowledged.	
Hopper, Tom	Oil industries should not be shipping volatile Bakken crude and toxic tar sands from Canada by rail through ANY community in the USA or Canada...This will just increase the risk of an oil spill, fire, or explosion. This exporting would only makes matters
Response: Comment acknowledged.	
Horak, Joan	In addition to the risk to our ocean and sea life, rails are too outdated and vulnerable to carry dangerous crude oil. Too many accidents have already happened.
Response: Comment acknowledged.	
Horan, Kate	Especially after the BP oil spill debacle in the Gulf of Mexico, and the tragic loss of life for both people and wildlife, these terminals are precipitate. Please do not approve them.
Response: Comment acknowledged.	

Commenter Name	Comment
Horman, Nancy	Why do we persist in sending oil and coal to Chins when even they are trying to use cleaner energy Help them in that effort.
Response: Comment acknowledged.	
Hornberger, Kathy	The dangers of continuing to use fossil fuels as energy sources has been well-documented. The country and the world cannot afford any more human mistakes in the handling of these materials. The US must join with other countries in promoting the use of c
Response: Comment incomplete.	
Horrillo, Karen	Stop messing up beautiful coast lines. Don't transport oil rigs near coast lines.
Response: Comment acknowledged.	
Hostetter, Margaret	Having suffered through a very hot summer....do we not realize we are late to this party!! Please facilitate this response.
Response: Comment acknowledged.	
Houchen, Amy	The last thing we need is crude setting the homes of Northwest people, animals and fish at risk.
Response: Comment acknowledged.	
Houghton, Natalie	No shipping terminals (they will end up polluting Washington's waters), and stop the dangerous oil train expansion!
Response: Comment acknowledged.	
Householder, Donna	We only have one earth to live on and pass on to future generations, please start putting the planet before people making money.
Response: Comment acknowledged.	
Houston, Nancy	The people of Washington do NOT want to have our state build shipping terminals and to have a huge increase in the number of oil trains passing thru our beautiful state.
Response: Comment acknowledged.	
Howard, Chris	Being a resident of Washington State I was recently driving along the Washington side of the Columbia Gorge heading West. Just below the road, between my car and the Columbia River, was the railroad track with a training barreling along at quite a high speed, wobbling back and forth as trains do. This train was only a few yards above the Columbia River! All it would take is one mishap or derailment to plunge a train loaded with oil right into the Columbia. This is way too much of a risk. Please stop the oil terminals in Grays Harbor...lets find other, less risky ways to make money.
Response: Comment acknowledged.	
Howe, Julia	Let's find better ways and stop pissing in the well!
Response: Comment acknowledged.	
Howell, Norman	No need to put dangerous oil trains, barges and tankers into our pristine waters full of wildlife at risk of over exploitation. No to oil terminals and tanker trains.
Response: Comment acknowledged.	
Howell, William	I am so tired of putting the interests of oil companies before the interests of our Earth, for oil spills are going to happen and affect so many people. It is no longer worth it to keep pretending that oil transport is safe, that oil is vital -- when its time is over and oil is now the resource of a previous era. It's time to be sustainable and SAFE. Thank you for reading my letter.
Response: Comment acknowledged.	
Howerton, Craig	Say "NO" to oil transport! Thank you for reading my letter.
Response: Comment acknowledged.	
Howie, Linda	Thank you for reading my letter. The endless quest for profit over the public safety has got to end.
Response: Comment acknowledged.	
Hricik, Jean	Dictatorship by commercial interests of local community has reached a tipping point in which compliance to the demands are intolerable. That government has collaborated so totally with the commercial interests against We The People suggests fascism, which is the natural end game of capitalism, taken to its completion. Stop exploiting human resources (people) and natural resources

Commenter Name	Comment
	(environment) which is nothing other than human rights violations and environmental rights violations. Thank you for reading my letter.
Response: Comment acknowledged.	
Huang, Karissa	We should all be moving towards cleaner alternatives like electric vehicles. The use of oil should decrease. Expanding oil transport is a step in the wrong direction and detrimental to the environment.
Response: Comment acknowledged.	
Huarachi, Michael	GET THE F*CK OUTTA HERE!!
Response: Comment acknowledged.	
Hubacker, Gloria	Please stop this proposal. It is time- past time- that we plan for longer term futures and keeping our earth safe and alive! These proposed terminals are not safe. Nor is the traffic from tankers and trains. Please do not accept this proposal. Thank you
Response: Comment acknowledged.	
Huber, Lea	I don't believe the expansion of oil transport in Iowa, or in any other state, is at all safe! Facts show that no matter how careful the oil company thinks it is, there is inevitably a leak or spill that does considerable environmental damage to both flo
Response: Comment incomplete.	
Huddart-wolfe, Loretta	I am opposed to transporting crude oil by rail~it is dangerous for people and other living things.
Response: Comment acknowledged.	
Huddleston, Mary	We do not need to put our country at risk for toxic oil spills. We don't want these dirty fuels being moved through our country! Thank you for reading my letter.
Response: Comment acknowledged.	
Hudon, Karen	I've had it with oil and gas companies endangering people and future generations - both with extreme fossil fuel extraction such as fracking which is killing people and hauling crude oil and other dangerous materials through communities. This must stop.
Response: Comment acknowledged.	
Hueneke, Edward	The negative aspects of this spread around a large geographic area and population, the positive aspects channel to a much smaller population and to no geographic area.
Response: Comment acknowledged.	
Huerth, Vicky	Our environment must be protected from pollution from oil transport accidents that are inevitable if we allow widespread transport of oil from Canada and the Bakken throughout our country. The time to atop this irreversable damage is Now.
Response: Comment acknowledged.	
Huey, Darien	I am not truly for stopping the transport of crude oil, but I am for tighter restrictions and better regulations as well as better enforcement of restrictions and regulations!!
Response: Comment acknowledged.	
Huggins, William	We need to get away from expanded oil infrastructure and onto greener future energy solutions.
Response: Comment acknowledged.	
Hughes, Elaine	To quote, "This is not the future we want. We live here, too, and have every right to determine the kind of country we want this to be.
Response: Comment acknowledged.	
Hughes, Kevin	Our addiction to oil must end! Thank you for reading my letter.
Response: Comment acknowledged.	
Hughes, Laurel	NO MORE ROLLING BOMBS THROUGH OUR NEIGHBORHOODS!!!!!!
Response: Comment acknowledged.	

Commenter Name	Comment
Hughes, Sarah	We already know that the time is long over due for clean - safe energy. This is not the time to expand oil transport.
Response: Comment acknowledged.	
Hukari, Susanne	I live 5 blocks away from these rails. I do not want any spills in my neighborhood- community, nor do I want it in any other community!
Response: Comment acknowledged.	
Hull, B.S. Biology, Danny	I don't approve of oil tanker trains, that are composed of oil tank cars hitched to oil tank cars, traveling through Klamath Falls! I don't approve of oil tanker trains, that are composed of oil tank cars that are carrying highly volatile Williston Basin oil and/or Alberta tar sands oil, traveling through Klamath Falls!
Response: Comment acknowledged.	
Hulsey, Tamara	STOP THE DANGEROUS EXPANSION OF OIL TRANSPORT IN OUR STATE
Response: Comment acknowledged.	
Hume, Shelley	Our future is in green energy, not the past of fossil fuel.
Response: Comment acknowledged.	
Hunt, David	The RISKS far outweigh the benefits for 99% of Americans, and 100% of Idahoans. The HAZARDS incurred when these risks become actualized are beyond unacceptable, as has been evidenced where other communities have seen the death and destruction. Reject th
Response: Comment acknowledged.	
Hunt, Debra	The proposed oil shipping terminals, the continuous oil trains, tankers and barges put our rivers, oceans, coastlines, lands and eco-systems at risk...at a very high risk. A risk that is too harmful to undertake! Not to mention the additional pollution that will be attributed to this industry. Please listen!
Response: Comment acknowledged.	
Hunt, Kathleen	please protect our environment from the disasters certain to occur with the transport of oil across our beautiful region. We need to get off our oil addiction and find a new way that doesn't threaten the health and well being of all living beings on the planet!
Response: Comment acknowledged.	
Hunt, LE	It's past time to move away from oil fuels and the hazards they present at so many levels.
Response: Comment acknowledged.	
Hunter, Sue	We want clean renewable energy like solar power NOW!
Response: Comment acknowledged.	
Hurd, Janet	I can't imagine an easier place to ruin for future generations of people and other animals. An oil disaster in Grays Harbor would mean the end of one of the most beautiful natural inlets on the W. coast.
Response: Comment acknowledged.	
Hurn, Emily	Thank you for reading my letter. The United States should work to become a leader in use of clean energy.
Response: Comment acknowledged.	
Hurt, James	Stand up for American People!
Response: Comment acknowledged.	
Hurt, Robin	In the face of the massive earthquake and tidal wave expected in Western Oregon, this is an audaciously dangerous plan.
Response: Comment acknowledged.	
Huskinson, John	I am against exporting America's oil, after decades of importing foreign oil. I also think exporting fracked oil will only cause more of this destructive practice.
Response: Comment acknowledged.	
Hutchings, Wes	It's time we started thinking ahead to life, rather than simply looking ahead to the next dollar.

Commenter Name	Comment
Response: Comment acknowledged.	
Hutchinson, Taylor	What the Shell, people?!?! Let's do this:-D.
Response: Comment acknowledged.	
Iaconetti, Francis	Building terminals is disruptive and most dangerous to communities. To build them so that U.S. produced oil can be shipped overseas instead of remaining in this country is crazy. Do not let the health and safety of U.S. citizens be risked so that big oil companies can make big profits. Thanks.
Response: Comment acknowledged.	
Ibur, Patty	We want to be done with oil. Solar now. Thank you for reading my letter.
Response: Comment acknowledged.	
Ignacio, Christine	Please take action to slow the damage to our lives and the future of this planet.
Response: Comment acknowledged.	
Immasche, Sonia	This is too dangerous to even contemplate. We already have had too many "accidents".
Response: Comment acknowledged.	
Inabinet, Samuel	Your actions and inactions are on the public record. We are all in it together.
Response: Comment acknowledged.	
Ince-johannsen, Tara	It's time to start getting serious about renewable energy!
Response: Comment acknowledged.	
Ingargiola, Peter	Please stop risking human lives, and the delicate ecosystem, with the huge risk of transporting filthy, toxic oil that may pollute and destroy our ground, water and air...
Response: Comment acknowledged.	
Ireland, Ilona	How many more must die? How much more can the environment take to continue to line the pockets of the already unbelievably wealthy? Oil magnets obviously must not have grand children that they care about. Someone must become conscious of the consequences
Response: Comment acknowledged.	
Irving, Marscha	Crude oil is not just a danger to our health and safety, the health and well-being of wildlife and the environment, it's also a danger to our planet. As one of the cleanest states in the country, we should have no part in the transportation and distribution of crude oil.
Response: Comment acknowledged.	
Isaac, Kathleen	Why ruin a location to support a dying technology? Why not use this pristine location for ocean studies, a campus, solar-energy development? Look to the future; Don't support the short-term past.
Response: Comment acknowledged.	
Isaacson, Judy	How sad that there is nothing sacred about our soil - especially at a time when we prepare for Thanksgiving and the gift of good land that we have received. Thank you for reading my letter.
Response: Comment acknowledged.	
Isbell, Linda	Transporting oil across this country is dangerous. Oil spills into our waterways are devastating to local communities. Train derailments are happening more and more frequently. This is not the future we want to see.
Response: Comment acknowledged.	
Isoda, James	We do not need more risk to the environment.
Response: Comment acknowledged.	
Iuele, Joan	Will this never end? We absolutely SHOULD NOT become an oil thoroughfare for other countries. Let them build their own ports. Time after time we have seen that so-called "safe-guards" do not work. we DO NOT need more pollution, oil spills, o

Commenter Name	Comment
Response: Comment incomplete.	
Ives, Christopher	Thank you for reading my letter. Did you know that oil spills on land and water cannot be cleaned up with current technology? There are more effective ways to recover the oil and also to actually restore ecosystems. However the industry is so focussed on profit that such solutions are never considered. Just look at the damage in (say) Nigeria, Russia, and Iraq - are people (or the media) blind to this?
Response: Comment acknowledged.	
Ivie, Esq Etc Etal, Dr. Charles	the gob, corps, and society have killed and polluted the planet for now purpose but money for a few, and waste for many!
Response: Comment acknowledged.	
J. Wagner, Donna	Thank you for reading my letter, and not destroying my country
Response: Comment acknowledged.	
Jacke, Dick	I am not only concerned about the risk of dangerous oil trains traveling through our communities but the overall affect of the proliferation of fossil fuel consumption that is affecting our climate in very deleterious ways.
Response: Comment acknowledged.	
Jackman, Louise	We need to get serious about protecting our environment. There are better options to fuel cars, heat our houses, buildings, etc.
Response: Comment acknowledged.	
Jackson, Anne	Crude oil is a thing of the past and we don't need huge terminals on our coasts to be places of potential environmental disaster!!
Response: Comment acknowledged.	
Jackson, Brenda	We live in an area of unsurpassed beauty. We need to guarantee that it remains for future generations. First responders and fire departments have noted time and again that they are not prepared to handle a spill and that it would have devastating conseque
Response: Comment acknowledged.	
Jackson, Bruce	Thank you for reading my letter, TransCanada Oil needs to take off and transport their Toxic Tar Sands oil through a CANADIAN port as we don't want that awful stuff in America!
Response: Comment acknowledged.	
Jackson, Celia S	Stop the dangerous expansion of oil transport within the State of Washington's coastline. The expansion across the nation is dangerous and benefits oil companies while posing a threat to the eco systems, communities and health of residents of the Northwes
Response: Comment acknowledged.	
Jackson, Jane	Thank you for reading my letter. It is time to take the nation's health and well being into serious consideratin. Let's not be doing things for shortterm gain that has long term irreversible effects.
Response: Comment acknowledged.	
Jackson, Judy	The risk of oil spills / disasters in our community do not survive a cost / benefit analysis; nor does transportation through our communities make any sense for humanity or sustainability. Stop the terminals now!
Response: Comment acknowledged.	
Jacky, S. J.	Now is the time to stop the dangerous expansion of oil transport in our state.
Response: Comment acknowledged.	
Jacobs, Harold	Crude oil and oil from bitumen or kerogen shales and sands are carcinogens. At a time when oil is a glut on the market it makes absolutely no sense to mine and produce oil from these sources. It is especially not reasonable to bring tar sand oils from Canada to be exported through the USA. If Canada is so desparate let them the take the risk with their own country. Although it is my understanding that British Columbia doesn't want anew pipeline. so it seems only the stupid politicians in Washington DC are in favor of it. Stop all transport from crossing into the USA.

Commenter Name	Comment
Response: Comment acknowledged.	
Jacobs, Kristina	We must stop investing in dirty fossil fuels that pollute our environment and exacerbate climate change. We must invest in clean, renewable energy that will promote sustainable job growth. Thank you for reading my letter.
Response: Comment acknowledged.	
Jacobs, Len	The proposed oil shipping terminals; the explosive, dangerous oil trains needed to feed them; and the continual parade of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of communities, the local economy
Response: Comment acknowledged.	
Jacobs, M.M.	Thank you for reading my letter. Please remember that the destruction of nature is irreversible (relative to our life spans) and that it will be far more costly than any short-term gains (for a small number of people) made from an industry that has earned the moniker 'dirty' for good reason. Renewable energy is the way forward and makes economic sense.
Response: Comment acknowledged.	
Jacobsen, Carol	Please protect our environment by stopping the transport of oil by rail.
Response: Comment acknowledged.	
Jacobson, Greg	Like logging before, this is likely just a relatively short term boom to their economy with potential long lasting negative effects. Grays Harbour has much better potential for sustainable growth and jobs. Look at the history of big oil and the waste lands they leave behind.
Response: Comment acknowledged.	
Jacobson, Susan	Let's move forward to a clean and flourishing future without fossil fuels.
Response: Comment acknowledged.	
Jacques, Cynthia	Any oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies. Renewable energy is much safer, cleaner, and offers new jobs for thousands of people. Renewable energy, not oil, is the future. The future is now.
Response: Comment acknowledged.	
Jacques, Karen	Given the severity of climate change, this country should not be shipping crude oil anywhere. Given the number of accidents that have already occurred with unsafe oil trains, allowing shipments by rail to continue as they have been will result in more de
Response: Comment incomplete.	
Jager, Jonathan	Thank you for reading my letter. Environmental and social concerns are important but so is national security. The more oil that is taken from American land and sold/used now, the less will be available if and when we need to defend ourselves. Taking and s
Response: Comment incomplete.	
Jakes, Andrea	I understand that oil is still currently necessary, but our focus needs to be on R&D for alternative fuels which are less disruptive to the environment. Thank you for thinking beyond today's economy and today's lobbyists.
Response: Comment acknowledged.	
Jakubiec, Robert	Avoid more environmental catastrophes like Exxon Valdez and Deep Water Horizon. Curtail oil industry expansion.
Response: Comment acknowledged.	
James, Carol	Keep Oregon green, safe, healthy, beautiful and uncontaminated, unlike those states that opened their doors to the oil industry's money. Do the right thing for Oregon simply because it is what is best for the health of our state, rather than what's best f
Response: Comment incomplete.	
James, Suzanne	This is not the future we want and only serves to enable our dependence on fossil fuels which increasing evidence says contribute to climate change. I want a healthy world and atmosphere for my grandchildren and their descendants. I urge you to conside
Response: Comment incomplete.	

Commenter Name	Comment
Jameson, Linda	Please stop destroying our home planet earth !!!
Response: Comment acknowledged.	
Janke, Susan	We need the Earth, it doesn't need us.
Response: Comment acknowledged.	
Janquart, Laurence	The Republicans are/have destroyed the country's economy, land, roads, school system, medical system, University, police department, the US supreme court, all court systems in our country. Because the Republicans insured that the rich/wealthy became w
Response: Comment incomplete.	
Jansen, Gary	It's way past time to rein in these filthy rich oil barrens who could give a hoot about the health and safety of we the people. Their lust for money and power has no bounds.Thank you for reading my letter.
Response: Comment acknowledged.	
Janusko, Robert	Keep this toxic crud out of my backyard, out of my town, out of my valley, out of my state, out of my country.
Response: Comment acknowledged.	
Jaramillo, Luz	Let's avoid Grays harbor becoming another wasteland of oil spills and pollution which is what it would undoubtedly become, history has shown this clearly
Response: Comment acknowledged.	
Jarmuth, Sandra	Kindly do not let this pipeline pass through NYS. Do NOT set up the conditions which will pollute our ground water, soil, livestoick, and plants.
Response: Comment acknowledged.	
Jarnstedt, Natalie	Don't allow transport of this volatile substance endanger anyone along its route from Canada! Thank you for reading my letter.
Response: Comment acknowledged.	
Jason, Eric	I live near rail lines that have heavy crude fuel traffic. I do not like the unsafe cars that are used to transport this fuel as these trains have become known as "bomb trains".
Response: Comment acknowledged.	
Jaszczak, Patty	We've seen TOO MANY ACCIDENTS happen in the past. We still don't know the LONG TERM EFFECTS all of those ACCIDENTS have on our environment. Let's not continue to make the SAME MISTAKES!! Thank you for reading my letter.
Response: Comment acknowledged.	
Jeffries, Linda	It's time to stand up to the oil industry and stop them from thinking only in terms of their own short-term profits and not in terms of the communities and the natural environment of this country in the long term. Thank you for reading my letter.
Response: Comment acknowledged.	
Jenkins, Danny	health over greed! is the next step for mankind.
Response: Comment acknowledged.	
Jenkins, Matthew	No oil trains! No oil terminal.
Response: Comment acknowledged.	
Jenks, Jean	Stop the oil terminals in Washington State!
Response: Comment acknowledged.	
Jennings, Carol	Please realize that the comments from the public should be taken seriously, We will be watching this issue closely.
Response: Comment acknowledged.	
Jennings, Rosemary (mimi)	We, that is, humanity, have not long been fossil fuel dependent. We can pursue other means.

Commenter Name	Comment
Response: Comment acknowledged.	
Jensen, Gairda	we need to be a shepard to our country and the destroyer of it
Response: Comment acknowledged.	
Jensen, Gregory	Grays Harbor is a critical nursery area for juvenile Dungeness crabs, English sole, and other important fishery species. It is also an important feeding area for migrating shorebirds. Don't put it at risk!
Response: Comment acknowledged.	
Jensen, Marilyn	Climate Change affects YOU and YOUR children and YOUR generations to come!
Response: Comment acknowledged.	
Jessica, Crotty	do not ruin this pristine harbor!
Response: Comment acknowledged.	
Jimenez, Carmen	Spend the money in other renewable sources of energy. Fossil fuel expansion is not the solution anymore. Move on!
Response: Comment acknowledged.	
Joannou Jr, Benjamin	we must stop investing in destructive technology. In fact, we need to divest in infrastructure that uses fossil fuels for energy. We need to leave the carbon that nature has already sequestered in fossil fuels in the ground. In fact, we need to discover ways to re-sequester the carbon that we have released into our environment over the past 200 years.
Response: Comment acknowledged.	
Jobe, Laura	We don't need any more transport for stinkin' crude oil.
Response: Comment acknowledged.	
Jobling, Catherine	We don't want increased crude oil rail traffic, oil spills and carbon pollution. Stop these projects now!
Response: Comment acknowledged.	
Jochum, Jill	Thank you for reading my letter. Protecting the environment may not be popular, but it is morally necessary. All it takes to affect change is one person to begin.
Response: Comment acknowledged.	
Joe, Just	We need to take serious and permanent steps to get off of the fossil fuel energy sources as they're all going to run out one day. We should be using our coastlines for wind energy as well as tidal and wave energy. Where is the funding for these investme
Response: Comment acknowledged.	
Johanson, Erica	Corporations are putting US citizens at risk for corporate gain. This in un-American
Response: Comment acknowledged.	
Johansson, Celeste	This issue is too important to be ignored.
Response: Comment acknowledged.	
John, Leland	In addition to the well documented dangers of oil use and transport, the horrid noise of train horns blasting away at all hours makes me want ,already, to move away from Oregon City.
Response: Comment acknowledged.	
Johns, Barbara	This is so unfair. This is not very smart. This is only going to get worse. We don't want this to happen. Stop this before it starts.
Response: Comment acknowledged.	
Johnson, Alvin	OK, no smoking pot on the job, OK!! More oil pollution, mmm, you must have thought it was hash oil. NO STUPID'S it is petroleum oil. In this case just say NO!!!
Response: Comment acknowledged.	
Johnson, Colette	Please do not place our cities, towns, neighborhoods, and homes in harm's way - stop the oil industry power over our government and welfare.
Response: Comment acknowledged.	

Commenter Name	Comment
Johnson, Debra	I don't know why you have my name, but I don't agree with you. There are pipelines all over the United States which is a lot safer than having them on trains and trucks. Just yesterday another train derailed. I am also tired of paying more for electricity
Response: Comment acknowledged.	
Johnson, Delton	Hauling this stuff through our communities is dangerous, unwafe, and foolish.
Response: Comment acknowledged.	
Johnson, Donna	Please stop expansion of shipping terminals in Washington. Please do not put our environment at risk.
Response: Comment acknowledged.	
Johnson, Ellen	Please take this as seriously as I do. Thank you for reading my letter.
Response: Comment acknowledged.	
Johnson, Janice	Enough profit! Too much environmental degradation already! Way too much safety risk for people! It must stop. We, the people, must stop it.
Response: Comment acknowledged.	
Johnson, Jeannine	No More " Oil Rail Traffic " & No More " Oil Tankers " & No More " Oil Spills & No More Carbon Pollution " !! Leave All The Oil In The Ground Where It Belongs ! " Oil " Is The Pass " Not Our Future Our Future Is " Wind & Solar " NOT Fossil Fuel !!
Response: Comment acknowledged.	
Johnson, Jo Ann	Thank you for reading my letter and taking responsible action for a safer future.
Response: Comment acknowledged.	
Johnson, Joan	Please consider the imminent destruction of our air, land and precious water, and peoples' homes, livelihoods and way of life. We need to end this pattern of greed at any cost. Thankyou for listening.
Response: Comment acknowledged.	
Johnson, Jodi	This is simply not worth the risk. Please say no.
Response: Comment acknowledged.	
Johnson, Kenneth W	Fossil fuels have had their day. Unless humanity wants to follow the dinosaurs into extinction, that's how it has to be.
Response: Comment acknowledged.	
Johnson, Lily	I live in Oregon along the route of these oil trains and do not want them here just so Big Oil can make profits. This is home to many people who have moved here because of the environmental wonders of this state.
Response: Comment acknowledged.	
Johnson, Mark	We need to expend our energies toward the development of alternative sources of energy... not continue to fund the same old outdated, deadly, and dirty ways. Thank you for reading my letter.
Response: Comment acknowledged.	
Johnson, Patricia	I have heard members of the Lummi Nation speak in front of thousands expressing their history on the land in what is now called the northwest and their of their desire that oil will not be transported across and near their lands, risking contamination of
Response: Comment incomplete.	
Johnson, Qayyum	Enough with out-of-control fossil fuel expansion! Americans do not want this!
Response: Comment acknowledged.	
Johnson, Richard	Thank you for reading my letter. I think we have caused way too much damage in general to our environment and consequently life quality. Sustainability is the only sane path forward, and less reliance on fossil fuels is essential. Thanks, Richard A. John
Response: Comment acknowledged.	
Johnson, Roxy	Stop risking our lives, our communities and our only planet.
Response: Comment acknowledged.	

Commenter Name	Comment
Johnson, Sharon	The article says it all: The proposed oil shipping terminals; the explosive, dangerous oil trains needed to feed them; and the continual parade of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of commu
Response: Comment acknowledged.	
Johnson, Susan	perehaps oil drilling and transport will become cleaner if oil execs are forced to lead the clean up at spill sites. If you made a bad decision you should clean up after yourself. Isn't that what mama taught you? Thank you for reading my letter.
Response: Comment acknowledged.	
Johnson, Vivian	We have seen how messy and hazardous to wildlife oil spills are. The practice of using trains, trucks and ships all offers opportunity for such spills to occur. The risks of oil spills during rail transport, at the terminal site, and during marine vessel
Response: Comment acknowledged.	
Johnston, Chad D	Oregonians will not quietly stand by as danger and dirty fuels are paraded through the State that we have spent our live protecting. Nor should Washington be considered as a State that will accept this danger within its borders.
Response: Comment acknowledged.	
Johnston, Jerry	You corporate owned political prostitutes in D.C. and State Governments are destroying our country.
Response: Comment acknowledged.	
Jolicoeur, Susan	We should be 100% focused on renewables, and ending our addiction to oil, coal and gas.
Response: Comment acknowledged.	
Jolles, Carol	I am dismayed that you propose to allow increased crude oil rail traffic with all of the dangerous consequences that this promotes. It is time to stop this wanton disregard for the health and safety of local communities, for the state of Washington, for the country and a world already in the early throes of extremely catastrophic responses to the extreme misuse of fossil fuels.
Response: Comment acknowledged.	
Jomarron, Ricardo	Thank you for reading my letter. As you are likely aware, tar sands oil is very dirty and loaded with carbon. We should not increase our capacity to consume this dirty fuel while risking spillscand explosions in its transport.
Response: Comment acknowledged.	
Jones, (the Rev.) Allan B.	This idea is dangerous and unnecessary, and should not be permitted.
Response: Comment acknowledged.	
Jones, AL	If the oil is for export there is no benifit to the US, only liability if there is a spill.
Response: Comment acknowledged.	
Jones, Ann	I support protection of Grays Harbor. The proposed oil terminals should be rejected and Washington State should meet our energy needs with clean renewable resources.
Response: Comment acknowledged.	
Jones, Bill	Why let the oil and railroads denigrate our earths health for their monetary gain. We live 50 feet from the BNSF track and we can feel the vibration and see the pollution from these huge trains. This is dangerous, don't let oil transport by train become t
Response: Comment incomplete.	
Jones, Christine	We need to protect our country from oil spills and carbon pollution.
Response: Comment acknowledged.	
Jones, Dorothy	Do not use Washington state coastline as a means to transport crude oil with all its attendant spills and carbon pollution. Destruction of our nation's coastline is unacceptable for humans and animals alike.
Response: Comment acknowledged.	
Jones, Edith	There must be better ways to meet our energy needs
Response: Comment acknowledged.	

Commenter Name	Comment
Jones, Gary	Thank you for reading my letter.leave it in the ground and put up a solar panel display.
Response: Comment acknowledged.	
Jones, Joel	No way this type of industry belongs in the Pacific Northwest, let alone in WASHINGTON STATE!!!
Response: Comment acknowledged.	
Jones, Ken	Please help protect our beautiful Pacific NW from the danger of oil spills and pollution.
Response: Comment acknowledged.	
Jones, Patricia	Thank you for reading my letter and for doing all you can to protect our environment
Response: Comment acknowledged.	
Jones, Rosemary	I live near the Santa Fe railroad tracks, within a few blocks of it, and I already see mile long trains that stop traffic at several intersections simultaneously due their many cars. Some of those are oil tankers on every train, I do not wish to see that number multiplied in the West to accommodate dirty oil products.
Response: Comment acknowledged.	
Jones, Tony	Thank you for reading my letter. As I have said so many times there are so many important facing us each day that the long term implications are often ignored for the short term gain. Environmental issue seem to be pushed aside often. But, the environment
Response: Comment incomplete.	
Jordan, James	Let's really think of the long term future. Keep petroleum in the ground and keep our ports, waterways and land safe and clean for generations to come!
Response: Comment acknowledged.	
Jordan, Joseph	STOP THE DANGEROUS EXPANSION OF OIL TRANSPORT IN YOUR STATE!
Response: Comment acknowledged.	
Jordan, Mark	STOP THE DANGEROUS EXPANSION OF OIL TRANSPORT IN YOUR STATE!
Response: Comment acknowledged.	
Jordan-Guzman, Rosa	I live across the street from the RRtracks and very near the Spokane River. The trains pass several times a day. I am afraid each time I see the tanker cars pass by with the MSDS code on the sides and I wonder what is being shipped when the trains pass by
Response: Comment acknowledged.	
Jordanmaree, Kersten	Solar is the way, Big Oil means death for this planet.
Response: Comment acknowledged.	
Jorgensen, Denis	What kind of foolishness is this that our country wants to export oil? If we have excess save it for our own use in the future and do not export any. It is my understanding that we are a country importer of oil so how do we become an oil exporter? Something smell about this situation and it needs to be stopped. Where is CONGRESS on this mess anyway? Could it be that the oil industry is now paying our CONGRESS members so that oil can be exported. Smells like it to me.
Response: Comment acknowledged.	
Jorgenson, Jerry	Fossil fuels should remain in the ground. There are now viable alternatives that will help rather than harm the country.
Response: Comment acknowledged.	
Joslin, Mary	Thank you for reading my letter. Valero is pushing here in Benicia to have the crude by rail come into port. This is an accident waiting to happen. The trains and the tracks are not equipped for this type of transportation.
Response: Comment acknowledged.	
Joy, Thomas	The Fossil Fuel Industry has served it's time of usefulness. Now is the time to move forward with other sources of energy, that's cleaner and safer for humans and our planet. Because of the President's plan to end our dependence of foreign oil, we have re
Response: Comment acknowledged.	

Commenter Name	Comment
Joy, Veda	Stop harming the environment and stop looking at the Northwest for shipping terminals, that could harm the coast and animals that live there.
Response: Comment acknowledged.	
Jozwiak, Mary	Don't expand the pollution of American land and water.
Response: Comment acknowledged.	
Juchert, Walter	We need to wean ourselves off of fossil fuels in a hurry if the earth is to remain habitable!
Response: Comment acknowledged.	
Judd, Patricia	Again, this is not what we want for our future. Please reject the proposed terminals at Grays Harbor. Thank you for your help in this important matter. Sincerely, Patricia Judd, Orrington, ME
Response: Comment acknowledged.	
Judith, Olson	we have enough oil - we are exporting oil - we want alternative power - you have enough money - don't you have a moral life - why destroy this area and kill many animals, ruin live for many people, when we don't need or want your product.....our plane
Response: Comment acknowledged.	
Juhl, Brandon	NO MORE OIL SPILLS!
Response: Comment acknowledged.	
Justus-rusconi, Valerie	It is time to invest in wind and solar and leave oil in the ground where it belongs! Thank you for reading my letter.
Response: Comment acknowledged.	
Kafka, MO	I'm very concerned about these oil trains; some of which I can see parked right under the entry ramps going into the state capitol and others within yards of apartment complexes and in view of children's playgrounds, all right along the edge of the Hudson.There is no way any of this is safe or smart.
Response: Comment acknowledged.	
Kagan, David	Thank you for reading my letter. It is time to end our dependence on earth and health destroying fossil fuels.
Response: Comment acknowledged.	
Kahn, Brigitta	Crude export was halted for a reason. There is no way to increase traffic and production of this toxic substance in a manner that is safe for the communities it is shipped through. Look at how many dangerous oil train wrecks and explosions already take place - what if that doubled? Or worse - what if that happened in the middle of a major port like Seattle? or Newark? It would be devastating - and surely the oil companies would writhe and wheedle their way out of fully-compensating the cities and states for all the damages (just look at how horribly the Deepwater Horizon cleanup was handled, or how Exxon is "offering a deal" to the state of New Jersey that's only a fraction of the damages). We have to put our feet down now before our communities are endangered by oil companies' desperate, short-sighted dollar grabs.
Response: Comment acknowledged.	
Kain, Lois	Stop these projects and leave fossil fuels in the ground. Don't turn Washington coastline into another Louisiana: polluted, contaminated, dangerous and ugly. We know "spills" are not just accidents, they are industry standards and can never really be clea
Response: Comment acknowledged.	
Kaminski, Fran	All my life I have tried to be conscious of the qualit
Response: Comment acknowledged.	
Kantner, Donna	Please don't turn Grays Harbor into an oil hub and ruin it's natural beauty.
Response: Comment acknowledged.	
Kantola, Barbara	This needs to stop. We have a beautiful, clean country (or did) before the oil industry started taking over and don't care what they destroy. Stop them!!!!!
Response: Comment acknowledged.	

Commenter Name	Comment
Kapner, Joanna	This project merely INCREASES our dependence on one of the dirtier fossil fuels - going in the wrong direction!
Response: Comment acknowledged.	
Kappel, Catherine	If not now, when? Now is the time to stop our country from being turned into a unsafe thoroughfare for crude oil transport. There are simply to many known and unknown risks and consequences to allow this to continue. The benefits of crude oil transport to the oil industry should never be allowed to outweigh the negative side effects to people and our environment. Thank you for reading my letter.
Response: Comment acknowledged.	
Karasek, Lois	These projects pose too great a risk to both the human population and the environment. No new oil export terminals!
Response: Comment acknowledged.	
Kardos, Theresa	As an environmental educator and field biologist, a parent, and a citizen who cares deeply about our planet and all its inhabitants, I believe that the risks to the environment and to human health from the proposed oil terminals in Grays Harbor override any possible benefits. At this point in history, we must be starting to undo the infrastructure involved in fossil fuels, or at best maintaining what exists, not building new ones. As climate change continues, we must understand that water issues will be critical: droughts in some places, floods in others. Maintaining water quality is vital, and we cannot increase the real risk of oil spills from increased oil tanker traffic and oil trains.
Response: Comment acknowledged.	
Karie, Piper	Oil transport is NOT safe in this country. There are very few safety precautions taken considering the devastating affects of Oil spill and ignition when an incident happens. We can no longer continue to put our oceans, soil and fresh water at risk.
Response: Comment acknowledged.	
Karlsda, Sylvie	With climate change, increased enviromental destruction, increased pollution, increased human population, ocean acidification, and the loss of species, we must stop adding to the problems of life on earth, and decisively move away from carbon fuels. Oil brings death with it whenever it goes. Please, spare our state and our planet from more destruction. We need to be investing in clean renewable energy. We need to protect our air, our water, and life on earth. Oil companies can't really clean up the destruction they always bring with them. They can't bring back lives. Let's not let them destroy more. They've done too much already. Thank you for reading my letter.
Response: Comment acknowledged.	
Karson, Sharon	Short-term profits don't come anywhere near balancing the damage this project would do to our ecosystem. It's past time to shoulder the responsibilities we owe the ecosystem that keeps us all alive and retire fossil fuels in favor of cleaner, more modern
Response: Comment acknowledged.	
Kaster, Kevin	There is still time to take action! Thank you for reading my letter.
Response: Comment acknowledged.	
Kauffman, L. L.	The Pacific Northwest is uniquely vulnerable to oul spills and othercecologocal disasters. We do NOT wantvto see a Gulf-type disaster there!!!
Response: Comment acknowledged.	
Kavanaugh, Kay	Grays Harbor must be protected from the disaster that would happen with the expansion of oil transport. Please protect the future of this area.
Response: Comment acknowledged.	
Kaye, Eleanor	JUSTICE FOR ALL!!!!!!!!!!!!!!PEACE ON EARTH!!!!!!!!!!!!!!!
Response: Comment acknowledged.	
Kazakevich, Victor	There needs to be comprehensive changes to all transportation of fossil fuels to protect our planet from the disasters of their spillage in any form.
Response: Comment acknowledged.	

Commenter Name	Comment
Kearns, Eileen	The oil companies shouldn't have the opportunity to destroy a section of Washington's coast line like BP did to the Gulf of Mexico. Our earth is precious and we need to take care of it.
Response: Comment acknowledged.	
Keast, Alix	Thank you for reading my letter. I am concerned about the safety of our land and people being endangered by oil spills, fires, explosions, pollution... And more.
Response: Comment acknowledged.	
Keatts, Susan	Grays Harbor is a treasured animal and human habitat. Do not endanger this area through oil transport.
Response: Comment acknowledged.	
Kednay, Sandy	Please respect the people, animals air, land and water, as well as the wisdom of the indigenous peoples. Thank you for reading my letter.
Response: Comment acknowledged.	
Keenan, Joann	We need to wean off fossil fuels. Placing another two dangerous train terminals and adding to the oil port risk in the Sound are a horrible idea. I'm very opposed.
Response: Comment acknowledged.	
Keene, Kevin	Thank you for reading my letter. Risking the environment, and it will happen, to support profit is not acceptable to say the least.
Response: Comment acknowledged.	
Keene, Paul	Please stop expansions of oil transport that put the environment and people at risk.
Response: Comment acknowledged.	
Keener, Lora	WE NEED TO RID OURSELVES OF OUR DEPENDENCY ON OIL, NOT MAKE TRANSPORTING IT MORE CONVENIENT FOR THE OIL MONGERS.
Response: Comment acknowledged.	
Keeney, Karen	The world cannot survive the continuing use of fossil fuels. Please help stop this foolish and unacceptably risky scheme.
Response: Comment acknowledged.	
Keep, Steve	The energy companies will never be able to provide any sort of guarantee that the facilities they will build and operate, will be operated safely. The management of those companies do NOT get concerned with operations level issues. They want to see profits and are not concerned with the environment, human life or climate change. Dollars, Dollars, Dollars. When we can say NO! We absolutely have to! The energy companies have had a century to prove their level of responsibility and WOW, have they FLUNKED. Now the citizenry of this nation can and must say "no more!"
Response: Comment acknowledged.	
Keesey, James	more oil trains means more risk.
Response: Comment acknowledged.	
Keighley, Angelina	Thank you for your help in protecting our environment.
Response: Comment acknowledged.	
Keirns, Ann	Fossil fuels need to stay in the ground and there should be NO encouragement or making it easy for them to get from the ground to a customer.
Response: Comment acknowledged.	
Keith, JL	WITH ABSOLUTELY N O BENEFIT TO U.S. AND EVERY D E T R I M E N T: oil shipping terminals; the explosive, dangerous oil trains needed to feed them; and the continual parade of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of communities, the local economy, tribal culture, and our ocean and coastlines at risk.
Response: Comment acknowledged.	
Keith, Nancy	Thank you for reading my letter. This path is not the highest path for our country. Pls RETHINK.
Response: Comment acknowledged.	

Commenter Name	Comment
Keith, Robert	we should change the name of our country to the United States of Greed , led by GOP greed for the wealthiest who set up sweet shops in country's where Americans have lost there live for what they though was freedom and humanity .
Response: Comment acknowledged.	
Keith-Singleton, Melinda	Please protect our coasts from oil transport and prevent rail spills and damage.
Response: Comment acknowledged.	
Kelley, Karen	Electric cars, hydrogen-powered cars, solar and wind energy are our future - not oil. Destroying beautiful, beautiful Washington would be a mistake - a big one.
Response: Comment acknowledged.	
Kelley, Margaret	Please think about the actual dangers of this to the community instead of the profits for once
Response: Comment acknowledged.	
Kelly, Betty	I do Not want poison/Oil transported in Va.
Response: Comment acknowledged.	
Kelly, Grace	We are turning into a third world depot for the sake of corporate profits. It's shameful.
Response: Comment acknowledged.	
Kelly, Margaret	Doing anything to harm our precious environment that we have left is a tragedy. This horror wished to be perpetrated on Grays Harbor and beyond is a catastrophe.
Response: Comment acknowledged.	
Kelly, Mary	We cannot afford more spills of harmful , hazardous materials through our land and waters.
Response: Comment acknowledged.	
Kelly, Rev. J. Patrick	It is outrageous that citizens are subjected to extreme danger and it is ignored. Stop this unsafe shipping of extremely dangerous oil. Thank you.
Response: Comment acknowledged.	
Kelsey, Lisa	Oil is so 1850. Let's do something that doesn't turn our water and air black. Hard to believe in 2015 that we STILL need to sign petitions. I wonder why. Shall we follow the money? Is greed still good?
Response: Comment acknowledged.	
Kemp, Kindy	It is patently absurd to be expanding fossil fuel operations now in the face of increasingly obvious climate change as well as all the other hazards this kind of development entails.
Response: Comment acknowledged.	
Kemper, Michael	We need to be getting off our addiction to oil, not spreading it around.
Response: Comment acknowledged.	
Kenady, Marianne	We are long overdue making changes to sustainable energy. Even at age seventy I would be happy to live with the lifestyle necessary to be compatible with the only home we have. our precious planet.
Response: Comment acknowledged.	
Kennedy, Bryan	Thank you for reading my letter. Where are we going to go once we destroy Earth
Response: Comment acknowledged.	
Kennedy, Elisa	This sounds too dangerous to the public andthe environment.
Response: Comment acknowledged.	
Kennedy, Jennifer	What progress can we make in our switch to green energy and slow our global warming, when big oil money keeps prolonging the mistakes of our past. A cleaner environment needs to be our top priority at this time in our history.
Response: Comment acknowledged.	
Kennedy, Joan	Forget oil, and champion clean energy!

Commenter Name	Comment
Response: Comment acknowledged.	
Kennedy, Linda	The oil industry has already proved that accidental damage to the environment is part and parcel to all of their projects. The risk to this precious area is too great; especially for an industry whose future must be replaced by something more sustainable
Response: Comment acknowledged.	
Kennedy, Mary	I lived in Grays Harbor for 25 years it is a beautiful place and it doesn't need oil companies bringing trains thru there with crude oil and we need to protect from oil spills and carbon pollution. Say NO to this or Grays Harbor won't be the same.
Response: Comment acknowledged.	
Kenner, Kate	Fossil rules have no place in this world or they surely should not. It seems the knowledge about climate change has done little to slow down the building of new and toxic ways to find them,extract them, or transport themNow oil companies want to build two new shipping terminals -when does it stop? When does the health of the planet and thus wildlife and people become more important than the profits to be made by those huge companies? this is yet another band and potentially dangerous plan.
Response: Comment acknowledged.	
Kent, Cynthia	We need to protect our communities, there are other ways to do this, but first of all, this should not be done at all.
Response: Comment acknowledged.	
Kentfield, Maren	This will not help the health of our people or environment. Thank you.
Response: Comment acknowledged.	
Kepner, Susan	We are getting closer and closer to CLEAN energy. Oil is becoming less and less needed. We DO NOT need more ways to transport DIRTY FUEL SOURCES!!!
Response: Comment acknowledged.	
Kercher, John	No more oil exports...leave in the ground until *our* country needs it. Future security is more important than immediate profits!
Response: Comment acknowledged.	
Kerensky, Marcia	I have children who live near the tracks in Portland.We do Not need more spills or toxic exposures. It is a safety issue for me.
Response: Comment acknowledged.	
Kerman, Paul	The oil industry should not be shipping volatile Bakken crude and toxic tar sands from Canada by rail through ANY community is a direction the global community cannot afford to go.
Response: Comment acknowledged.	
Kermath-vick, Holly	Thank you for reading my letter. I is time to start giving our Earth the humble respect it has long deserved and needed. I feel that it is rather like a neglected elerly relative who waits patiently to be remembered. Were is our compassion for she who has supported us, giving her life-blood, the milk of her core, whenever we "needed" it. She truly is "Mother Earth", and it is time we stop "using" her, and started taking care (preserving) of her, before she's all used up!
Response: Comment acknowledged.	
Kern, Lisa	Thank you for reading my letter. Please stop two terminals proposed for Grays Harbor, Washington, and protect our country from increased crude oil rail traffic, oil spills and carbon pollution.
Response: Comment acknowledged.	
Kerr, Zachary	We need to stop being selfish and start thinking about the planet and future.
Response: Comment acknowledged.	
Kesner, Mary	Washington State needs to lead the way in going toward sustainable energy by now supporting expansion of fossil fuel industry in our fragile ecosystems. Start thinking generations ahead and not just a fiscal period ahead! This is the only earth we have.
Response: Comment acknowledged.	

Commenter Name	Comment
Kester, Miriam	Please, do not allow big oil to use our land and sea ways for transporting their products. The risks outweigh the benefits here.
Response: Comment acknowledged.	
Ketchum, Lynn	We must ALL step up and be better stewards of our earth, fit us abd for future generations. Greed can no longer be part of the big picture. Thank you for reading my letter.
Response: Comment acknowledged.	
Ketter, Mark	Oil is an energy source of the past. Washington state needs to be looking forward to sustainable energy expansion, not spending money on environmentally dangerous oil.
Response: Comment acknowledged.	
Khan, Khalil	This is when we can choose not to go in the wrong direction.
Response: Comment acknowledged.	
Khlinovski Rockhill, Lawrence	The risk is to great and this must be stopped.We the people of Oregon have to much to loose in this most beautiful state.
Response: Comment acknowledged.	
Khoram, Maryam	Thank you for reading my letter. We want a cleaner greener future for our planet!
Response: Comment acknowledged.	
Kiefer, Marc	Our natural resources should stay here and not be exported.
Response: Comment acknowledged.	
Kiely, Lavive	These trains are bombs on wheels. Let's put solar panels on every American home, promote electric cars, and do away with the oil industry once and for all!
Response: Comment acknowledged.	
Kilgour, Jeanie	It is time to start putting our environment ahead of short term profits. A dead planet produces NO jobs and NO profits - and that is the direction in which we are heading. Please do the right thing and disallow the degradation of the Washington State and her waters.
Response: Comment acknowledged.	
Kilker, Anna	The thought of ground water contamination is more than enough reason to can this project. It is not in the best interest of the American people or future generations.
Response: Comment acknowledged.	
Kim, Earl	Time to begin ending our dependence on fossil fuels (globally), especially "dirty" Bakken types that directly threaten all those who are nearby. It's time to start the shift away from oil, coal, and fracked gas. Start with Gray Harbor!
Response: Comment acknowledged.	
Kimball, Joan	You just want to do away with oil. The reason we do it by rail or trucks is because liberals won't let pipelines to be built so it only stands to reason you are a bunch of environmentalist who would rather we don't drive cars and only the elite and those
Response: Comment acknowledged.	
Kimmich, Martha	Do not endanger our population with these risky, unnecessary transportation plans.
Response: Comment acknowledged.	
King, Katherine	Instead of building new causeways for a finite energy resource, why not invest in a renewable resource, such as solar and wind?
Response: Comment acknowledged.	
King, Ron	Enough already. It's time to get the country off oil!!!
Response: Comment acknowledged.	
King, Susan	Thank you for reading my letter. I wish adults would have made an effective push for renewable energy more than 40 years ago, when I was a child, so that we would not have to still be fighting for

Commenter Name	Comment
	this. Dependence on oil puts us at risk of conflict in the Middle East AND is extremely dangerous and harmful to all the living things on this earth without a voice heard by politicians. Please stop putting the environment at risk just so we can have more dirty oil! Be a leader and move this country away from dependence on oil and start pushing to have cleaner, renewable energy.
Response: Comment acknowledged.	
Kingston, Nancy	As a public health/health care professional for 35 years, I strongly believe that the environmental and health and safety risks aren't worth it.
Response: Comment acknowledged.	
Kinley, Alyssa	We don't need more dirty fossil fuels in the first place, but we especially don't need more dirty fossil fuels shipped through our communities and already-stressed marine habitats. Fossil fuel industry profits should not come at the expense of the health and safety of our people and our planet.
Response: Comment acknowledged.	
Kinney, Honora	Support the common good.
Response: Comment acknowledged.	
Kinney, Kate	So pleased that the XL Pipeline was stopped. Let's keep up the good direction and slow the dangerous expansion of oil transport. Instead, STEP UP to clean, renewable energy.
Response: Comment acknowledged.	
Kinsey, Chetan	Its time we start leaving our oil in the ground.
Response: Comment acknowledged.	
Kinsinger, Barbara	Make rail transport safe within our country and do not export oil.
Response: Comment acknowledged.	
Kirby, M	The oil industry should not ship volatile Bakken crude and toxic Canadian tar sands by rail through ANY community. There is too much risk of an oil spill, fire, or explosion -- especially when raising this dirty fuel production increases global warming.
Response: Comment acknowledged.	
Kirk, Mary	We need to be using the clean energy that is being used in space now by earth colonies!!!! So stop the charade that oil and gas are our only sources of energy!
Response: Comment acknowledged.	
Kirkham, Connie	Enact NESARA now!
Response: Comment acknowledged.	
Kirkhoff, Mary	Keep the fossil fuels safely underground. don't let anyone spill them on us!
Response: Comment acknowledged.	
Kirmeier, Pamela	We need to concentrate our efforts on clean energy. I vote no on oil transport.
Response: Comment acknowledged.	
Kirmse, Katie	This is not the future we want!!
Response: Comment acknowledged.	
Kisling, Lori	Regulate the density of containers transporting the more dangerous tar sands crude and warn the railroad industry of the increased danger of same. Until we are at zero fossil fuel use, climate change is the ONLY issue.
Response: Comment acknowledged. In Section 4.5.3, the Draft EIS has included mitigation measures that would reduce impacts related to rail transport.	
Kissinger, Curtis	Enough with the oil, can we evolve yet?
Response: Comment acknowledged.	

Commenter Name	Comment
Kitchen, Rowena	The Port of Vancouver and BNSF have been working toward this goal for years. Tesoro desperately wants to get its' products to west coast refineries and shipping and is touting use of newer, supposedly safer rail cars. They are not safe. Transportation o
Response: Comment incomplete.	
Kittredege, Elaine	People not corporate profits!
Response: Comment acknowledged.	
Klco, Elisha	Please don't allow Washington to be a traffic zone for oil.
Response: Comment acknowledged.	
Klein, James	This remains a vexing problem primarily due to industry's ability to curry favor with elected officials. The corrupting influence of money in our political system is undermining our democratic traditions and discouraging Americans from voting and/or running for office. This ominous development may well end our experiment in representative democracy unless we alter this decades-long trend. For the sake of the republic, we must amend the US Constitution to state that corporations are not people (and do not have constitutional rights) and money is not speech (and thus can be regulated by state and/or federal campaign finance laws). Short of accomplishing this, no other reform of significance will be achieved. The moneyed interests will turn any reform to their benefit, often at the expense of the nation as a whole.
Response: Comment acknowledged.	
Kleist-corwin, Julaina	It's not worth putting communities in potential danger.
Response: Comment acknowledged.	
Klepadlo, Clarice	Thank yoWE MUST NOT LET THIS HAPPEN!
Response: Comment acknowledged.	
Kleven, Margaret	Stop the building of oil terminals in Grays harbor!
Response: Comment acknowledged.	
Kline, Carole	Americans want Big Oil Companies to open their eyes and minds to the value of safe, sustainable energy and direct all their efforts in that direction. Oil has made them the greediest companies on earth. I'm so sick of being victimized by OIL that my car
Response: Comment incomplete.	
Kline, Kristin	So many options for clean, green energy now.
Response: Comment acknowledged.	
Kling, Ray	Please do not allow oil transport facilities to jeopardize the pristine environment of the Washington coast We DO NOT NEED another Gulf or Exon disaster in the Northwest.
Response: Comment acknowledged.	
Klinke, David	It's both dirty and potentially dangerous. We need to get away from all fossil fuels. Thank you for reading my letter.
Response: Comment acknowledged.	
Klock, William	Great job rejecting Keystone that's long overdue. Thanks now let's get this tar oil and other oil out of our train cars blowing up and spilling this junk across our country. Thank you again.
Response: Comment acknowledged.	
Klunder, Christine	Where the hell do they think this is going to go, China? China's reducing use.
Response: Comment acknowledged.	
Klutka, Kerry	It is time to find other ways to power our country so that the air, ground water and oceans are safe for our children and grandchildren. Lets stop making it easy for fossil fuel purveyors to continue destroying our environment.

Commenter Name	Comment
Response: Comment acknowledged.	
Knapp, Bonita	Time to phase out the fossil fuels and start using other alternative fuels. Respect the lives of Americans and our land, as well.
Response: Comment acknowledged.	
Knight, Lynn	Thank you for reading my letter. I have lived in Seattle several times, and the thought of America going backward in protecting the Earth and its resources is very distressing.
Response: Comment acknowledged.	
Knoll, Lucy	We MUST stop the expansion of oil shipping transport which will put the health of our ocean and coastlands at risk with danger of oil spills.
Response: Comment acknowledged.	
Knox, Van	Stop the expansion!
Response: Comment acknowledged.	
Knudson, William	Pleas keep us safe and our environment clean.
Response: Comment acknowledged.	
Koblenz, Ruth	This is not the future we want!
Response: Comment acknowledged.	
Kobylarz, Denise	The oil industry has shown that it doesn't care about people, communities or the environment. We've been working hard to protect our land and keep it free from pollution and contamination. The oil industry has shown just the opposite. They take no resp
Response: Comment incomplete.	
Kocet, Holly	We need to protect our sensitive environment. Too many spills. Please do not put our land and waterways at risk.
Response: Comment acknowledged.	
Koch, Suzanne	It's time to stand up and do the RIGHT thing! We have ignored the environment too long.
Response: Comment acknowledged.	
Kodzik, Margaret	Just had a train derail in a city close to us. Bad oil leak! YOU MUST MAKE THE OIL CARS SAFER!!!
Response: Comment acknowledged.	
Koehler, Francine	The risks outweigh the benefits. Don't do it.
Response: Comment acknowledged.	
Koepf, Gail	I dont currently live in WA, but my daughter and her family does and I plan to move there in a couple of years. Thank you for reading my letter.
Response: Comment acknowledged.	
Kohn, Lynn	Increasingly the resources are going abroad while Americans have to live with and in the mess left behind. Thank you for reading my letter.
Response: Comment acknowledged.	
Koich, Debra	This is ugly, ugly, ugly. Stop turning this beautiful world into an ugly mess. There are alternatives and you know it!
Response: Comment acknowledged.	
Kokkinen, Eila	Transport of toxic, volatile dirty oil is too dangerous for human and environmental health, air and water resources. Hundreds of derailments have occurred causing environmental catastrophies in many communities. This cannot continue. Keep it in the gro
Response: Comment acknowledged.	
Kolhek, Ted	Thank you for reading my letter. Are we never going to learn from the recent past? Alternative sources are much safer. The sun and wind etc., will probably be around a lot longer than fossil fuels Money should not be a reason for ruining our planet.

Commenter Name	Comment
Response: Comment acknowledged.	
Kollar, Susan	We need to protect our communities from dangerous pollution.
Response: Comment acknowledged.	
Kollender, Anne	I have opposed oil shipment through Oregon and want to see it decrease not increase to protect the environment and those along the rail corridors. In our household we are 100 percent clean renewable energy.
Response: Comment acknowledged.	
Kolwicz, Frank	Thank you for reading my letter. Investing in infrastructure for the continued excessive reliance on fossil fuels will make it that much harder to kick our deadly habit: don't build any more terminals!
Response: Comment acknowledged.	
Komin, Tatyana	stop crude oil transportation thru US
Response: Comment acknowledged.	
Korn, Meryle A.	Under no circumstances should the State of Washington agree to ANY oil/gas terminals! Our state needs to take the lead in saying NO to Big Oil; NO to Big Coal; NO to any other expansion of fossil fuel disbursement to other nations. The time is now to prevent any further damage to the only planet we have from fossil fuels!
Response: Comment acknowledged.	
Korneliussen, Vivian	The Quinalt Indian Nation have treaty rights protecting fishing & gathering rights to this major estuary. The safety and environmental ramifications of allowing permits to build any terminals, that would endanger the livelihood of the Quinalt Indian Nation, much less, or that would break treaty rights, is outrageous!
Response: Comment acknowledged.	
Kosek, Raphael	Thank you for reading my letter. More oil transport will only mean more chance for disastrous spills and breaks no matter what assurances are given.
Response: Comment acknowledged.	
Kosola-johnson, Joy	Grays Harbor is a critical area for a multitude of migratory birds and other wildlife. This is the source of tourism revenue for the area that would be damaged or destroyed with the inevitable pollution generated with oil transport.
Response: Comment acknowledged.	
Kosse, Kate	I thought the point was to increase US energy security but increasing exports goes in the opposite direction.
Response: Comment acknowledged.	
Kott, Diane	Thank you for reading my letter. Simply put, the big oil indcannot guarantee safety for any kind of drilling or transport of crude oil. I prefer wind and solar energy, hands down! It is time for big oil to step down for the sake of safety!!
Response: Comment acknowledged.	
Kovarik, Penny	Thank you for reading my letter.Clean Energy not Oil is our future .. Can we move on ,the future is waiting ..
Response: Comment acknowledged.	
Koziol, Cathy	I urge you to consider existing alternatives for transportation such as the train system in the US that is suffering from loss of revenue derived from transport of coal.
Response: Comment acknowledged.	
Kraft, Diane	It is time for a real change in how we prioritize the protection of the environment.
Response: Comment acknowledged.	
Krakauer, William	This is very important. The risks are huge! Just because this stuff is in the ground doesn't mean we have to pump it up and use it. We must support, use and develop our clean power options.
Response: Comment acknowledged.	
Kramarck, John	Health before profits.

Commenter Name	Comment
Response: Comment acknowledged.	
Kramer, Dee	We have seen the tragedies caused by oil spills in other parts of our country like the Gulf and in Alaska. This is the time to work together for safer and renewable fuels, not take more risks.
Response: Comment acknowledged.	
Kramer, Robin	How much of Grays Harbor will suffer from rising sea levels? Don't trade long-term protections for short-term financial gains.
Response: Comment acknowledged.	
Kraus, Jo Anne	We need to take every step we can to keep fossil fuels in the ground. Building more transport facilities is not in the best interest of the world. Let's stop subsidizing fossil fuel expansion and turn to new, clean technologies. The future is now! Thank y
Response: Comment acknowledged.	
Krause, Kate	Why should we sacrifice our marine waters for big corporations to make more money at the expense of everyone else?
Response: Comment acknowledged.	
Krebill, Kerry	This is also particularly important to those states where the crude oil passes through, like MONTANA. Thank you for reading my letter and protecting our fragile environment.
Response: Comment acknowledged.	
Krebs, Amanda	No more terminals for pulling in unwanted crude oil. Bad for the earth and bad for humans and other animals.
Response: Comment acknowledged.	
Kreda, Marjory	The technology is not up to the task.
Response: Comment acknowledged.	
Kreil, Joanne	Thank you for reading my letter. There is to much risk for disaster and pollution of all kinds to allow this. Plus it's mainly to profit a few people. People who have no personal interest in safeguarding the land and people who live in this proposed corridor. Don't allow them to jeopardize the lives of many to profit very few. Thank you.
Response: Comment acknowledged.	
Krevit, Sheldon	For all of the reasons mentioned, by Earthjustice, in this request, which seem logical to me, I urge you to say "NO" to these oil trains.
Response: Comment acknowledged.	
Krevitz, Alex	We should be switching to renewables
Response: Comment acknowledged.	
Krewson, Caroline	We have a chance to stand up to the oil industry now and slow the dangerous expansion of oil transport. Oil companies want to expand their Northwest operations by building oil shipping terminals on Washington's coast and turning our region into a thoroug
Response: Comment acknowledged.	
Kribel, Lois	Greed has no conscience. There are many things more important than profits. Saving our environment and our beautiful country from oil spills and carbon pollution should be at the top of the list.
Response: Comment acknowledged.	
Krieg, Bill	Thank you for reading my letter.I grew up 1 block from RR tracks thank God We were not blown to kingdom come!
Response: Comment acknowledged.	
Kringlen, Sarah	We are sick of corporations and our government disregarding public oppinion and trading public safety for money.
Response: Comment acknowledged.	
Krivosheia, Eloise	Please do not endanger this country in a needless way and so careless of its potential harm to so many people and to land, air, and water.

Commenter Name	Comment
Response: Comment acknowledged.	
Kropp, Nathan	I am very concerned about the risk of oil spills connected with the proposed Grays Harbor terminals. I urge you to reject the applications for these terminals.
Response: Comment acknowledged.	
Krow, Jessica	We are smarter than this. We don't want to dig up any more fossil fuels than absolutely necssary to transition to clean fuels and renwables. I have no interest in turning the US into an oil induatry wasteland.
Response: Comment acknowledged.	
Krueger, Bruce	We should keep oil in the ground as much as possible. Climate change is real and will change the way people live in the near future and beyond.
Response: Comment acknowledged.	
Krumdick, Kasuandra	Short-term profit of oil companies should not be the basis of long-term civil engineering and energy planning. Please consider future generations and the environment in which they will live and support sustainable energy.
Response: Comment acknowledged.	
Krumrein, John	We must start to end our dependence on fossil fuels now.
Response: Comment acknowledged.	
Kruse, Tannis	I have been in the oil n gas industry since 1996 and I have seen the negligence of how the pipes are put in, I've seen the damage it causes the earth. I think this should be stopped, plain n simple !
Response: Comment acknowledged.	
Krysinski, Brian	Please stop the madness & support alternative energy development. We don't have any extra time so please do the right thing.
Response: Comment acknowledged.	
Kubick, Linda	Thank you for considering these important aspects of environmental concern!
Response: Comment acknowledged.	
Kuchera, Joan	the risk is unacceptable
Response: Comment acknowledged.	
Kuhl, Teresa	Thank you for reading my letter. We already have a lot of trouble with large oil companies refusing to pay for the damage they cause: Note Deepwater Horizon! We really don't want to open the door for more incidents like this.
Response: Comment acknowledged.	
Kurka, Wend	The Oil industry profits do not cover the costs of oil spill accidents - not worth the risk. No Oil Transport wrecking Washington.
Response: Comment acknowledged.	
Kysel, Paul	read yesterday that LBJ received a report warning about climate change and if we'd had the intelligence to act then we might not be facing possible future extinction Please act
Response: Comment acknowledged.	
Kysor, Anita	Stop the dangerous oil transports in MY state Anita Kysor 412-956-7554 akysr@aol.com
Response: Comment acknowledged.	
L, A	Enough is enough. STOP POISONING THE PLANET AND EVERYTHING ON IT
Response: Comment acknowledged.	
Labiosa, Eleanor	Thank you for reading my letter. Evidence is building that our planet is already reeling from the affects of our addiction to fossil fuels. We have no time to waste appeasing an industry that has already added a heavy burden to the crisis and hidden evid
Response: Comment incomplete.	
Lacombe, Judy	Dutchess Co. NY has this problem. Would not wish it on anyone. Thank you for reading my letter.
Response: Comment acknowledged.	

Commenter Name	Comment
Laemmerhirt, Daniel	Why doesn't anyone understand that the fossil fuel industry is dead in the water? The writing is on the wall and everyone just refuses to accept it. Not to even mention the environmental dangers that are explained here. Expanding the oil industry now is like celebrating Christmas on Febuary third.
Response: Comment acknowledged.	
Lafranchi, Anita	Gray's Harbor is not just industrial - but also a tourist and recreation area of Washington State. We do not want the Evergreen state to be polluted by oil spills and other catastrophes. Our state is on track for green energy - and we don't want to encourage fossil fuel expansion.
Response: Comment acknowledged.	
Lafreniere, C.L.	Thank you for reading my letter. The time is well past to get off of dirty effing carbon and move NOW to clean energy.
Response: Comment acknowledged.	
Lagasse M.d., Dr. Jeffrey Paul	Thank you for reading my letter. We all need to do whatever we can to keep this toxic carbon sequestered underground.
Response: Comment acknowledged.	
Lagos, Ben	We, the People, are sick and tired of being taken for granted. Thank you for your time.
Response: Comment acknowledged.	
Laird, Mark	Domestic use is one thing, anything else is unacceptable. There are environmental risks that do not need to be taken in the name of corporate greed and profits. In case you did not notice this is a land of people, not barren waste lands of sand.
Response: Comment acknowledged.	
Laird, Victoria	We are TOTALLY opposed to the transport of oil through our state as well as the Bakken pipeline! We do not want it yards from our home (as planned), and we do not want in Iowa or any other state!
Response: Comment acknowledged.	
Lairson, Kimberly	No potential bomb trains!
Response: Comment acknowledged.	
Lakey, Julia	Protect the health and safety of our communities and our Salish Sea. Recovering from a spill would have unthinkable devastation.
Response: Comment acknowledged.	
Laliberte, Marc	Oil is not part of our future! Keep it out of our region.
Response: Comment acknowledged.	
Lamb, Barbara	We must free ourselves from our oil addiction.
Response: Comment acknowledged.	
Lamb, Robert	WE do not want your oil spilled on our land !!!
Response: Comment acknowledged.	
Lambeth, Larry	The risks of oil export terminals are not acceptable! Do not permit oil terminals in Grays Harbor!
Response: Comment acknowledged.	
Lampka, Joseph	Don't gamble with our environment. Look at the adverse impact of big oil on the fishing industry in the Gulf of Mexico.
Response: Comment acknowledged.	
Lander, HB	It is wise to consider what future we want to leave the children; Protected beauty or a mess to clean up?
Response: Comment acknowledged.	
Lane, Karen	This is 100% unacceptable at any level. We need to be finding renewable resources for energy needs that do not endanger our lives or the health of our planet. I will be watching how you support our well being.
Response: Comment acknowledged.	

Commenter Name	Comment
Laney, Kate	Please learn the lesson that other small towns have learned: oil companies do not care if you have clean water or clean air or good healthy children. They will ruin your town merely for their profit and leave your town when the problems become too expensive. Do not allow them to get a foothold in your town by saying that they will bring needed jobs-they will bring company rep's and management in and have only temporary jobs for locals. Very few people will actually prosper-their promises are hollow. By keeping your environment-your marine waters and clean air you protect jobs-tourists and light industrial jobs because you make your town a clean and healthy place to live. Oil is on the way out-don't saddle your town with a losing prospect. Your children will thank you.
Response: Comment acknowledged.	
Lange, Gordon	No need to export our carbon, keep it in the ground.
Response: Comment acknowledged.	
Langelan, M.	This really matters.
Response: Comment acknowledged.	
Langer, Daniel	Enough already! I don't want crude oil to be transported over land by rail in America.
Response: Comment acknowledged.	
Langford, Lora	Thank you for listening and doing the right thing by rejecting the proposed oil terminals.
Response: Comment acknowledged.	
Langley, Helen	Our planet can not afford to use, transport or export oil any longer. We can not be a party to this environmental degradation. We must mandate a renewable power infrastructure. Thank you for acting to stop oil transport by rail!
Response: Comment acknowledged.	
Lankford, Melanie	This area has just started to heal after the massive environmental disaster that was the logging boon. Let's not make our state a wasteland anymore.
Response: Comment acknowledged.	
Lanning, Bill	please stop transporting this dangerous volatile oil, its not safe or necessary.
Response: Comment acknowledged.	
Larkin, Laura	Washington has a beautiful coastline, it makes no good sense to endanger it by allowing the oil industry to use part of it to transport their products. None of the oil companies seem to value anything but profits. If they did, there would have been far f
Response: Comment incomplete.	
Larouche, John	These oil tankers are extremely dangerous. The Lake Megantic tragedy which destroyed the whole town and vaporized most of its inhabitants was a train hauling crude oil. This should be a wake up call to stop this dangerous transport of oil by rail. Thanks
Response: Comment acknowledged.	
Larsen, Debbie	Continually one reads and hears about toxic oil spills destroying pristine habitat and killing wildlife. Let alone the danger it brings to our own safety and health. Please stop and prevent the continuation of the defastating affects of fossil fuel use an
Response: Comment incomplete.	
Larsen, Tom	The fossil fuel infrastructure already delivers in excess of demand. It is destined o deliver less, not more. This is not needed and any risk to our nayural resources is unwise
Response: Comment acknowledged.	
Larson, Christine	The risks we face with oil industry proposals for dangerous expansion are not worth it.
Response: Comment acknowledged.	
Larue, Erik	We must move away from dirty energy!
Response: Comment acknowledged.	
Lasalle, Randee	Fossil fuel is fast becoming a terrible risk, it's impact on our health and our very survival has become clear. We need to be the future, not stuck in the muck of our past.
Response: Comment acknowledged.	

Commenter Name	Comment
Laskasky, Cheryl	The risk of oil spills is too great! Save the beautiful Northwest coast and its wildlife! The environmental damage would be too great and impossible to rectify.
Response: Comment acknowledged.	
Laster, Jr, Ira	Our environmental health is to important to be threatened by the harvesting of fuels to be transported to other countries who may not be as concerned about the environment as many citizens in the US are.We should leave as much unharvested in the ground as possible.
Response: Comment acknowledged.	
Laughlin, Trella	Thank you for reading my letter. Why does the big oil industry destroy so much beauty?
Response: Comment acknowledged.	
Laurel, Sandra	Thank you for reading my letter. Help save this Earth for our children & grandchildren.
Response: Comment acknowledged.	
Lavassaur, J.M.	How stupid is it to allow expensive development of new infrastructure for an industry that we need to be phasing out? How counterproductive is it for a country that strives to be "energy independent" to ship our energy resources to other countries?
Response: Comment acknowledged.	
Lavish, Jessica	It's time to find solutions to already existing oil problems NOT create new problems. We've already destroyed the earth, let's not sign our death warrant please. STOP THE TERMINALS!
Response: Comment acknowledged.	
Law, Diana	We don't want any more pollution in WA, thanks. Please invest in cleaner energies.
Response: Comment acknowledged.	
Lawler, Vedet	America is already the greatest benefactor to global warming, we should not contribute to that detrimental conclusions in various ways. Deeply concerned, Vedet Lawler
Response: Comment acknowledged.	
Lawr, Pat	how much money are they to gain? this is probably the motivation behind this. usually isn't it.
Response: Comment acknowledged.	
Lawrence, Lenora	Don't put the health and safety of so many people at risk. There will be spills that will destroy fisheries and pollute an important ecosystem. The risks far outweigh any potential gain.
Response: Comment acknowledged.	
Lawrence, Mark	This practice of shipping volatile material through communities has got to stop. Please find another solution as soon as possible!! Thank you for your cooperation in this matter.
Response: Comment acknowledged.	
Laws, Miki	The natural heritage of our land must be protected and conserved for future generations. Especially our resources should be carefully protected for our nation's future use, and not sold for short-term profit to other nations. We will need these resource
Response: Comment acknowledged.	
Lawson, Bart	Having been born in a state renowned for its crude oil production I can speak of the nasty remains of crude oil production and transportation. It needs to be not allowed if possible and strictly controlled if not stopped! A quick trip to Eastern Oklahoma will convince any skeptic of how nasty the remains can be even after decades of trying to clean up the mess!!!
Response: Comment acknowledged.	
Le Coq, Lindy	When will we ever learn?
Response: Comment acknowledged.	
Leadley, Patricia	VOTERS IN NEW YORK DO NOT WANT FOSSIL FUELS TRANSPORTED THROUGH OUR STATE! STOP TRANSPORT OF CRUDE OR ANY OTHER FORM OF FOSSIL FUELS THROUGH NEW YORK STATE!
Response: Comment acknowledged.	
Leaming, Lisa	PLEASE Stop this! We have one country and one planet, that we are currently decimating! If we do not stand up and stop the thoughtless destruction of our environment by protecting the earth from the greedy, careless oil companies, who care only for profit

Commenter Name	Comment
Response: Comment acknowledged.	
Learned, J.	As a bird watcher the Grays harbor area has special significance for me in addition to the concerns listed in EarthJustice's letter which i support wholeheartedly. Keep oil out our sensitive coastal areas!
Response: Comment acknowledged.	
Lebeau, Barry	Thank you for reading my letter. Oil transport is too Dangerous to allow especially in both residential and environmentally sensitive areas
Response: Comment acknowledged.	
Lechner, Carl	The plans to develop two West Coast terminals at Grays Harbor, WA to handle crude is in itself beyond crude. This is another example of Big Oil running roughshod over the rest of us. The risks and liabilities that will result--on top of ones that are al
Response: Comment acknowledged.	
Ledford, James	I don't want my state and my home to become a national sacrifice zone. Are you will to put alll the land between Spokane and Grays Harbor at risk for oil exports. ou cana all go to hell. Any one and and party the votes will lose my VOTE forever!
Response: Comment acknowledged.	
Lee, Carol	The United States is the most beautiful country on earth, representing several different climates. Please take care of it. Once it's gone, it's gone. Thank you.
Response: Comment acknowledged.	
Lee, Gale	Please protect our country from the unwarranted shipment of crude oil .
Response: Comment acknowledged.	
Lee, Nella	Please do not allow the oil companies to dictate the future of our beautiful state, which is being slowly ruined by development everywhere.
Response: Comment acknowledged.	
Lee-meeder, Susan	Please do all you can to protect America, it's health, beauty. Thank you for reading my letter.
Response: Comment acknowledged.	
Lehigh, Cynthia	Please protect our communities and put the emphasis on renewable energy sources. Thank you for reading my letter.
Response: Comment acknowledged.	
Lehman, Mary	Please help slow the dangerous expansion of oil transport. Help stop terminals proposed for Grays Harbor, Washington. Stop exposing the American people to more crude oil traffic, oil spills, and carbon pollution. Keep our families safe.
Response: Comment acknowledged.	
Leider, Ethel	We don't need this stuff.
Response: Comment acknowledged.	
Leigh, Tara	The time is NOW to invest in other forms of energy and reduce our reliance on fossil fuels. It is detrimental to our land, oceans, and the People. Stop the madness - NOW!
Response: Comment acknowledged.	
Leiter, Rebecca	It's time to put more funding into solar and wind power.
Response: Comment acknowledged.	
Leivant, Natalie	This is my backyard. I don't feel comfortable with increased train pollution and the possibility of an accident putting my neighbors and I at risk.
Response: Comment acknowledged.	
Leka, K.	Please do not aid & abet more pollution producing and dangerous activity for the fossil fuel industry!
Response: Comment acknowledged.	
Leming, Karen	PLEASE DON'T BUILD HERE - PROTECT AND PRESERVE THIS BEAUTIFUL AREA!!

Commenter Name	Comment
Response: Comment acknowledged.	
Lemon, KA	Let Canada export is tar sands from its own country! Stand up for indigenous cultures who don't want to sacrifice, again, their culture. And stop giving corporations the money-making without making them pay the costs! Thank you!
Response: Comment acknowledged.	
Lengel, Elizabeth	These oil trains WILL NOT improve the quality of life for nearby residents.
Response: Comment acknowledged.	
Lenz, Andrew	Let's leave it in the ground.
Response: Comment acknowledged.	
Leonard, Billie	These proposed oil terminals are a threat to the very survival of the thriving marine waters at Grays Harbor. The transport of this volatile dangerous oil that could cause a major disaster if it derailed. These trains are going through the very heart of I
Response: Comment incomplete.	
Leonard, Candie	Grays Harbor is an area which bird watchers congregate to every year. Hundreds of thousands of shorebirds migrate from Central and South America to the Artic each spring, stopping at the nutrient rich mud flats of the Grays Harbor National Wildlife Refuge to refuel and rest. Many people, including myself, look forward to travel to Grays Harbor to witness this migration and celebrate the area. These tourists bring in $ to Grays Harbor and provides a needed place for these migratory birds. Please do not allow oil industry into this beautiful area!! We need to protect these areas, which everyone has come to know, enjoy and love. Thank you, Candie
Response: Comment acknowledged.	
Leopold, David	Stop these shipping terminals from being built and making it easier for the Oil and Gas industry from shipping these products overseas, burned, thus adding to the greenhouse gas builtup and accelerating climate change.
Response: Comment acknowledged.	
Lerner, Albert	Oil transfer too dangerous for humans and the environment.
Response: Comment acknowledged.	
Leroy, David	Why can't we use our ingenuity to protect the environment while harvesting natural resources? Thinking only of profits has become the ruination of our beautiful country and we must change our attitudes before it is too late!!!! Thank you for reading my let
Response: Comment incomplete.	
Leroy, Greg	Oil transport is multiple disasters waiting to happen. It's not safe...end of story!
Response: Comment acknowledged.	
Leslie, Jean	Thank you for reading this message & for your attention to this urgent matter.
Response: Comment acknowledged.	
Lesperance, James	The evil use of is destroying the planet to a critical point, our son and draughts will not die of old age. We have free, clean energy patterns locked up by evil powerful people. Stop the insanity! Stop killing inventors
Response: Comment acknowledged.	
Less, Sandra	Time for change and a hopeful future. Sandra Less
Response: Comment acknowledged.	
Lester, Anne	We, the citizens of Washington, are in danger of losing our autonomy...our ability to control our environment. WE MUST STOP THIS1
Response: Comment acknowledged.	
Letourneau, Pamela	Thank you for reading my letter. We stand at the time for significant changes in the way we view our earth for now and the future generations. Greed and profit and endless consumerism do not bode well for us.
Response: Comment acknowledged.	

Commenter Name	Comment
Leven, Marie	We do not need the pollution on our roads, rails or in our ports! Keep it in the ground!
Response: Comment acknowledged.	
Levin, June	Pretty soon there will be no beautiful places in the United States thanks to greed!
Response: Comment acknowledged.	
Levine, Gregg	The tanker cars now in service are wrong for this idea. We do not want a repeat of spills and devastating fires that have hit one Canadian city and the spills that have surfaced out west. We need to stop this idea and discontinue the practice until a bett
Response: Comment incomplete.	
Levitt, Jeff	Leave it in the ground. Stop develment of resources we don't need just for profit's sake at the expense of the planets' health and welfare. These profiteers need to be reigned in, stop the extraction, and tax them for the damage to health and climate. To
Response: Comment incomplete.	
Levy, Joyce	we are capable of finding ways to live modern lives without destroying the environment. Let's all mature. Let's invest in the technology that will protect, preserve, and restore our environment rather than further destroy it. Thank you for turning down this proposal.
Response: Comment acknowledged.	
Lewis, Daniel	Earn your pay and prestige. Step away from the dirty corporate money.
Response: Comment acknowledged.	
Lewis, Dorothy	This is not an acceptable solution to our energy needs. We need to protect our natural beauty and resources and develop alternative energy sources!
Response: Comment acknowledged.	
Lewis, Evelyn	Please consider long-term solutions to energy and profit needs that will not permanently contaminate Grays Harbor.
Response: Comment acknowledged.	
Lewis, Jane	These terminals and pipelines are not necessary - we have means of delivering oil. Do not risk our environment for the sake of your "bottom line". Thank you for reading my letter.
Response: Comment acknowledged.	
Lewis, Joyce	I grew up in Aberdeen.,I know they need jobs....but not this kind. One tanker accident & all of the Harbor & environment could be destroyed for years.
Response: Comment acknowledged.	
Lewis, Mark	Don't turn us into a pipeline corridor for the world.
Response: Comment acknowledged.	
Lewis, Ruth	Please stop destroying our environment. Our planet is for all peoples and our country and state MUST be protected and cared for for future generations--it is not all for us!
Response: Comment acknowledged.	
Lewis, Samm	Thank you for reading my letter. The risks of such operations to our environment cannot be fully mitigated. I strongly oppose this.
Response: Comment acknowledged.	
Lewis, Sammarye	Thank you for reading my letter. I absolutely oppose oil transport terminals, and oppose the shipping of toxic oil by rail.
Response: Comment acknowledged.	
Lewis, Sharon	This would be destruction of our natural environment here in Washington State. I have already seen the ugliness of oil in the water when a fishing boat got away from its mooring. We must limit our use of oil so that we don't have to ruin our coastal are
Response: Comment acknowledged.	
Lewis, Sherry	Thank you for reading my letter. We should be spending on renewable sources not more OIL!
Response: Comment acknowledged.	

Commenter Name	Comment
Lewis, Wendy	Do not destroy the beauty of the region by making industrial oil transport it's main function. Do not allow oil transport in Gray's Harbor.
Response: Comment acknowledged.	
Lhotan, Carole	I don't want to increase our chances of oil spills and carbon pollution.
Response: Comment acknowledged.	
Licastri, Antonina	Thank you for reading my letter Thank you for saving our country from ruthless, greedy petroleum corporations.
Response: Comment acknowledged.	
Lickerman, Mark	THE US and the world needs clean renewable energy not more POLLUTING OIL!
Response: Comment acknowledged.	
Lidard, Tim	I oppose any transportation plans that will further degrade and destroy our environment, such as these.
Response: Comment acknowledged.	
Lieder, Cecilia	Since when has our beautiful land become simply a pass-through for dirty and dangerous products to be sent overseas? Who ARE these scoff-law people who value nothing but money??
Response: Comment acknowledged.	
Lien, Heather	Please do everything in your power to switch our country from fossil fuels to renewable energy. We need to use less of this dangerous and polluting crude oil that contributes to climate change.
Response: Comment acknowledged.	
Liesener, Judy	Please don't mess up our beautiful coast with all of this awful, scary , dirty oil! Just leave us alone!
Response: Comment acknowledged.	
Lima, Larry	Please do the right thing and fight the evil fossil fuel industry!
Response: Comment acknowledged.	
Lin, Victoria	Please do not allow profiteering to have preference over the preservation of what's left of our beautiful earth, and the safety of a culture. We as humans are not made to be slaves to money, money was made for us - let's not let it become our master.
Response: Comment acknowledged.	
Lind, Laura	Please, make the responsible decision to protect the countless citizens and neighborhoods endangered by this plan--stop the expansion of oil transport in the PNW! Thank you from a resident who lives 1 mile from the train line.
Response: Comment acknowledged.	
Lindemann, Erica	American oil should stay in the ground, not be shipped to foreign countries, where it will add pollution to the earth's atmosphere.
Response: Comment acknowledged.	
Lindequist, Sue	I spend a lot of time on the mainland and so I care about the quality of life there. Please discontinue the expansion of oil traffic.
Response: Comment acknowledged.	
Lindey, Claudine	No.....the future of our country is at its highest risk.....do we need another target for terrorist NO.....DO WE NEED SAFER WAYS TO TRANSPORT CRUDE OIL etc...YES.....ENOUGH IS ENOUGH.....
Response: Comment acknowledged.	
Lindgren, Jean	Keep it in the ground!!!!!!
Response: Comment acknowledged.	
Lindgren, Joan	When oil was discovered in the Bakken, we thought that at the least we could be independent from the Middle East. Then the Canadians started moving into our country with pipelines and oil train cars to transport oil right through the heart of our country
Response: Comment acknowledged.	

Commenter Name	Comment
Lindholm, Karen	The risks are too high, the benefits to low, and the direction all wrong for our future, for crude oil to be transported or piped thru this country. Let them build refineries by the source if they want to continue their practices. Enforce practices that
Response: Comment incomplete.	
Lindsay, Alasdair	No to any tar sands oil entering anywhere in the US.
Response: Comment acknowledged.	
Lindstrom, Karen	There is already too many oil trains chugging past my house. A spill will burn the entire valley before the necessary help will arrive...and for what?
Response: Comment acknowledged.	
Lines, Barbara	We are worried about these train on a daily basis but what clean up are they responsible for if we do have that 9. Earthquake in the area? Will they clean up any of there mess ever or will it be our small communities burden?
Response: Comment acknowledged.	
Link, Carol Ann	oil by rail is not a good idea.
Response: Comment acknowledged.	
Link, Tom	Please stop this risky activity
Response: Comment acknowledged.	
Linscott, Carol	It is vital that these actions be stopped. The devastation to the Pacific Northwest is not what should be taking place, rather the preservation. Keep Washington and oil separate.
Response: Comment acknowledged.	
Lint, Daniel	And you guys in government thought you'd "out California" California...well, you really suck at it. The best state in the lower 48, and you intend to sell out. What marvelous pieces of...well, sell out, then look yourself in the eyes. Only Satan sleeps we
Response: Comment incomplete.	
Lipe, Reva	If your house backed up to this railroad track would you really want this to go through? Is it really worth the chance of poisoning our waterways, our ground water, our fish and wildlife, our towns and our children to make some corporation richer? Really?
Response: Comment acknowledged.	
Lipka, Jordan	Stop transporting oil and risking disaster everywhere. This is crazy. Go solar and wind instead.
Response: Comment acknowledged.	
Lipton, Judith	I love going to Ocean Shores and the magical seaside near Gray's Harbor and Hoquim. It would be a crime to pollute these areas and to run the risk of oil spills on Washington's marvelous seaside. Just Stop!
Response: Comment acknowledged.	
Lisk, Roynane	we must protect our community by not allowing shipping terminals to be built on our western coast!
Response: Comment acknowledged.	
Liska, Steve	I would also like to point out the movement toward green/renewable energy sources that is growing and profitable. Germany already gets 27% of their energy needs from renewable sources. China is on it's way as well. The oil industry in this country could d
Response: Comment incomplete.	
Lissie, Anna	Time to change to alternate fuel sources
Response: Comment acknowledged.	
Liston, Guy	Please do what you can to preserve a decent life for our grandchildren, thanks, Guy
Response: Comment acknowledged.	
Lisy, Helene	Please do the right thing and think of The USA - its people, wildlife, water and other resources precious to us. Thank you for reading my letter.

Commenter Name	Comment
Response: Comment acknowledged.	
Litten, Edna	In order to avert catastrophic climate change we need to transition to renewable energy sources as quickly as possible. it is an added bonus that efficiency, solar and wind power are all much cleaner than oil. Thank you for considering my comments.
Response: Comment acknowledged.	
Littlefield, Caroline	Enough of dangerous pollution of our habitat. It's time to take care of the earth so it will last for all time. No oil expansion on the coast of Washington state!
Response:	
Littmann, Bill	Thank you for reading my letter. Remove Fossil Fuel infrastructure to DRIVE sustainable innovation!!
Response:	
Lobbins, Eric	We must stop climate change before it is too late!
Response: Comment acknowledged.	
Lobianco, Maryann	Please don't do this. It's too toxic and really harms the environment, wildlife and humans. Climate change is also a problem we can't ignore.
Response: Comment acknowledged.	
Loch, Jill	We need to protect our environment and people from rail oil spills. We need to use wind and solar renewable energy.
Response: Comment acknowledged.	
Locher, Debra	Leave it in the Ground!
Response: Comment acknowledged.	
Loder, Madeline	Thank you for reading my letter. Stop this . We are turning our country into one that only supports the very rich and powerful.
Response: Comment acknowledged.	
Loeffelholz, Craig	Whether paid for with public and or private resources, we do need to get beyond the ill legacy and long term economic and ecologic costs of investing in such infrastructure and ill approach to holding onto ill cash cow investments that oppresses our futur
Response: Comment incomplete.	
Loew, Dana	We shouldn't take risks to ship oil to other countries when we may need it in the future. Exporting oil doesn't benifit the United States or it's future security or enviroment. Thank you for your consideration.
Response: Comment acknowledged.	
Logan, Catherine	Thank you for reading my letter. Please leave carbon in the ground where it belongs - where it builds healthy soil.
Response: Comment acknowledged.	
Loiselle, Julie	The risks and damage far outweigh any benefit to housing and transporting crude oil in the proposed areas in Washington. Please take aggressive action against the oil companies to prevent our country from being a thoroughfare for crude oil transport. Thank you for reading my letter.
Response: Comment acknowledged.	
Long, William	Please act to protect coastal communities from the threat of oil spills and carbon emissions.
Response: Comment acknowledged.	
Longenbaugh, John	The days of oil are coming to a close. Let's look to the future not the past.
Response: Comment acknowledged.	
Long-Lusk, Sandy	I cringe every time I see a tanker on the highway. Just this week, Ohio pulled a tanker out of Raccoon Creek just outside of Newark, Ohio. I don't care if it's oil, acid, or whatever we can't afford another spill anywhere. Haven't we done enough to our
Response: Comment acknowledged.	

Commenter Name	Comment
Lonkey, Karen	We will not stand by while the oil companies jeopardize our communities for their greed.
Response: Comment acknowledged.	
Lonstron, Lisa	Oregon does not want this. Please keep out!
Response: Comment acknowledged.	
Loomis, Mina	We and the whole world need clean energy solutions. Please turn this around now.
Response: Comment acknowledged.	
Looney, William	The jobs now growing are not related to fossil fuel. For the sake of ALL OUR FUTURE, do not add shipping oil expansion.
Response: Comment acknowledged.	
Lopatin, Leonard	Please!
Response: Comment acknowledged.	
Loper, Paul	this is so important. We cannot keep going in the direction of more extraction.
Response: Comment acknowledged.	
Lopes, Maureen	We have to make government and other officials know that we want to explore alternative fuels in order to save the planet. If this goes through they will never even try to think in a different direction.
Response: Comment acknowledged.	
Lopez, Andy	Thank you for reading my letter. The President has taken the first step, let's continue on this track. Andy
Response: Comment acknowledged.	
Lopez, Celia	Thank you for reading my letter. Stop two terminals proposed for Grays Harbor. Washington,and protect our country from increased crude oil rail traffic.oil spills and carbon pollution.
Response: Comment acknowledged.	
Lopez, Reine	Whether good or evil, every person's deeds affects the entire planet. The Earth is our home and all of God's creation depends on people doing the right thing, the good thing. Please do the right thing and protect our land and wildlife. Thank you
Response: Comment acknowledged.	
Lorenz, Robyn	The oceans are already polluted with plastic. We don't need to add oil to the mess too.
Response: Comment acknowledged.	
Lotko, Noreen	We need to protect our environment; for our children. We've already damaged our planet, let's not continue. Thank you.
Response: Comment acknowledged.	
Louck, Marion	I am signing this petition because this is so dangerous and just plain wrong.
Response: Comment acknowledged.	
Loudin, Frank And Janet	This is not the future we want anywhere in our country: the proposed oil shipping terminals; the explosive, dangerous oil trains needed to feed them; and the continual parade of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of communities, the local economy, tribal culture, and our ocean and coastlines at risk - as well as the well-being of the planet as a whole, in contributing to increased climate change and resultant destruction of life. This is not the future any of us wants.
Response: Comment acknowledged.	
Love, Mary	I have seen the damage caused by derailed oil transport cars. We cannot afford the damage that they cause. We also cannot afford these risks when we take the risk and the oil companies take the profits.
Response: Comment acknowledged.	
Love, Victor	Climate change is killing America!
Response: Comment acknowledged.	

Commenter Name	Comment
Lovell, Tim	For decades, the fossil fuel industry has refused to read the writing on the wall and make a timely transition to responsible energy. They continue to compromise air, water and soil quality for profits, as do the communities and politicians who support th
Response: Comment acknowledged.	
Low, David	In the larger scheme of things, there is NO NEED for these terminals.
Response: Comment acknowledged.	
Low, Sammy	Climate change is bringing a disaster. An expansion of oil transport is furthering disaster on all fronts.
Response: Comment acknowledged.	
Lowe, Judith	This expansion of oil transport is dangerously short sighted and must be stopped!
Response: Comment acknowledged.	
Lowe, Paige	We don't want a pipeline through our state or country. There is a too big a risk in a disaster happening and wildlife will be killed and landscape will be destroyed!! I say no!!'
Response: Comment acknowledged.	
Lowe, Rosemary	There will surely be more oil disasters, to poison the air, water and soil, if more proposed oil shipping terminals are built. This will result in more Industrialized Wastelands, not only impacting humans, but wild lands, and wildlife as well.
Response: Comment acknowledged.	
Lozaw, Kevin	Let's not be a country that kick's the can down the road. Thanks for listening, Kevin
Response: Comment acknowledged.	
Lozow, Karen	Thank you for reading my letter. I want a clean ,beautiful world for now and the future too.
Response: Comment acknowledged.	
Lu, Jolene	Please protect our community from increased oil rail traffic, oil spills and carbon pollution. The newly proposed to terminal for Grays Harbor, Washington are not the best interest for our community.
Response: Comment acknowledged.	
Lu, Michael	In the age of developing green technology to fight climate change, it is really a mistake and shame to develop more oil shipping terminals. Thank you for reading my letter.
Response: Comment acknowledged.	
Luciano, Peter	No crude oil within the borders of Oregon or along the Columbia River system including its tributaries, backwaters, sloughs, swales or anywhere in the Pacific Northwest. Keep that stuff in the ground you fools!
Response: Comment acknowledged.	
Ludden, David	It is time for the Northwest to invest in inexhaustible energy, and the jobs that go with it. We have sun, wind, tides, waves; every thing needed.
Response: Comment acknowledged.	
Ludlam, Jessica	Environment is more important than oil
Response: Comment acknowledged.	
Ludlow, Laurie	Let's say yes to safer, new renewable energy, and no to more oil and coal which has been damaging to our environment. Let's protect Grays Harbor and it's people.
Response: Comment acknowledged.	
Lue, Mary Catherine	I live 1/2 block from railroad tracks. I see oil tanks being transported every day. I don't feel safe. mcl
Response: Comment acknowledged.	
Lueders, Kira	On a recent flight over the Washington coastline I was awed by the beauty of the waters and islands. Don't let such projects put this at risk. Thank you for reading my letter.
Response: Comment acknowledged.	
Lukas, James	We should be promoting clean energy instead of dirty oil!

Commenter Name	Comment
Response: Comment acknowledged.	
Luna-Repose, Pat	Thank you for reading my letter.COULD WE PLEASE STOP DESTROYING OUR PLANET BY DOING IGNORANT EVIL DEEDS! STOP THE MADDNESS
Response: Comment acknowledged.	
Lund, Dana And Cindi	Thank you for reading my letter. We live part time in the San Juan Islands, and we can't imagine how horrible it would be to have an oil spill in those pristine waters!
Response: Comment acknowledged.	
Lundberg, Crys	Thank you for reading my letter. Please don't allow the crude--in every sense of the word--oil industry to further damage our precious natural environment.
Response: Comment acknowledged.	
Lunde, Lauren	My family's favorite vacation is to fly into San Francisco, rent a car, and drive all the way up the west coast to Washington visiting areas along the west and north shores while making our way to Seattle and flying back home. It would be very sad if the beautiful area of Grays Harbor were to be polluted by an oil spill, destroying wildlife, marine life and polluting the waters up and down the coast for many years to come. Thank you for reading my letter.
Response: Comment acknowledged.	
Lundell, Victoria	Thank you for reading my letter. Funding dirty energy development is a no win endeavor for the commonwealth. Please be wiser than that.
Response: Comment acknowledged.	
Lupascu, Radu	Thank you for reading my letter.please stop the distruction of our planet and our country.
Response: Comment acknowledged.	
Lusby-denham, Anne	Crude oil export is not acceptable due to the danger it poses for communities and to the ongoing concerns about carbon pollution.
Response: Comment acknowledged.	
Lyday, Margaret	We have many more ways to fuel our cars and businesses. The Chinese are buying up land in Florida for solar energy fields! Why aren't we leading the way in our own country.
Response: Comment acknowledged.	
M Ajercik, Stephen	Its time for Big Oil to invest in renewable energy and do their share to protect our planet!
Response: Comment acknowledged.	
M, Stacy	Please stop putting $$$ above everything else. Our safety, health and future for our children is being compromised through out our country. There are enough clean air solutions and alternate options available.
Response: Comment acknowledged.	
Mac Innes, Diane	Thank you for reading my letter. We must stand strong against the profiteering that will cost taxpayers billions and destroy public health and all that is precious to us. Please take courage. The people will be grateful.
Response: Comment acknowledged.	
Mac Kendrick, Gary	Find another way. This is dangerous and a tragedy will happen that we cannot then take back. The potential destruction to our environment is not worth the risk!
Response: Comment acknowledged.	
Mac Nish, Robert	The highest and best use of fossil fuel is carbon sequestration. The worst use is to burn it, creating greenhouse gas that will change our planet in some very unpleasant and expensive ways.
Response: Comment acknowledged.	
Mac Tahgart, Kelly	If we no Longer have Forest & Trees all your doing is Killing everyone!! Must have TREES TO BREATH!!
Response: Comment acknowledged.	
Macavery, Tristan	Thank you for reading my letter. This is of deep concern to me; we need to grow out of this dangerous fossil fuel addiction and all of its collateral damage.

Commenter Name	Comment
Response: Comment acknowledged.	
Macdonald, Elspeth	Thank you for reading my letter.End use of fossil fuels. NO EXPORT TERMINALS FOR GRAYS HARBOR, WASHINGTON. Or anywhere else. Think of the children. You may have children and grandchildren. Protect them.
Response: Comment acknowledged.	
Macgillis, Miriam	Please stop being a vessel for bargaining away the rights of our children and our planet.
Response: Comment acknowledged.	
Mackenzie, Catherine	It's time to be sensible and consider the ramifications of what we do to the earth and it's inhabitants.. These shipping terminals are NOT the answer to our needs.
Response: Comment acknowledged.	
Mackenzie, Joan	Why would we even consider doing this?? Why do we continually place our environment at risk? There are way too many risks to even think about allowing this. Please consider our environment, our nation and our people/ Please do not allow this to happen.
Response: Comment acknowledged.	
Mackey, Melvin	Help save our planet while it is still possible!
Response: Comment acknowledged.	
Maclean, Nancy	Do what is right, we do not want increased crude oil rail traffic, oil spills and carbon pollution.
Response: Comment acknowledged.	
Macmurray, Christine	I not only do not want to see the expansion of oil transport, but I also would love to see oil transport decrease to the point that it isn't transported at all anymore.
Response: Comment acknowledged.	
Madden, Fred	Energy sufficient, not energy exdporters!
Response: Comment acknowledged.	
Maddlaena, Teri	Please move oil transport to land, not sea. A spill will not be an ecological disaster.
Response: Comment acknowledged.	
Maddlone, Claire	We must preserve the beauty of our beloved country. Instead of using filthy fossil fuels, we could develop more advanced power sources, such as solar and nuclear power.
Response: Comment acknowledged.	
Madigan, Michael	Thank you for reading my letter. Think about you're planet not profit!!!
Response: Comment acknowledged.	
Madlon, Sharon	Thank you for reading my letter. We must get off the fossil fuels. Their transport is just not safe.
Response: Comment acknowledged.	
Madrid, Jennell	There are no benefits and major potential for very bad environmental disaster. No way should we allow this.
Response: Comment acknowledged.	
Magana, Adriana	This nonsense needs to stop. Let's make the move today towards less consumption, efficiency measures and renewables!
Response: Comment acknowledged.	
Magarian, Robert	We should not be exporting our oil to other countries. We were told at one time that we should be energy independent, and that we should not be importing oil from big bad Saudi Arabia. Now we are bring told we should be selling oil to other countries, thus driving up the cost of gas.
Response: Comment acknowledged.	
Magne, Kathy	I have a friend who lives close to a oil train route in Minnesota. He's very worried about it. The stress is negatively effecting his health. We need to switch to clean energy now!
Response: Comment acknowledged.	

Commenter Name	Comment
Magnotto, Luke	Grays Harbor is a special environmental site. We cannot risk its ecologic destruction. There have been numerous rail accidents across America in the past several months which have created plenty of environmental destruction. Please, no more.
Response: Comment acknowledged.	
Mahan, Kathleen	We have to stop supporting the extraction of products from the earth and promote renourishment.
Response: Comment acknowledged.	
Mahar, Jess	Thank you for reading my letter. STOP THIS NOW!
Response: Comment acknowledged.	
Maher, Kathleen	Leave that dirty mess in the ground where it can't kill us.
Response: Comment acknowledged.	
Mahoney, Mary	People first,not money
Response: Comment acknowledged.	
Maida, Kathleen	STOP THIS!!!
Response: Comment acknowledged.	
Mainland, Edward	More infrastructure for fossil fuels -- at a time when the global climate's heating is getting out of control -- is insane.
Response: Comment acknowledged.	
Makofske, William	The US still imports a large amount of oil and will likely do so for some time. Transporting it internationally takes a lot of effort and energy. Reduce our oil imports by not exporting US oil. Thank you for reading my letter.
Response: Comment acknowledged.	
Malarney, Holly F.	Thank you for taking the time to consider my very deep concerns regarding this issue.
Response: Comment acknowledged.	
Maleski, Karen	Can we stop promoting fossil fuels, and give renewables a reasonable chance ?
Response: Comment acknowledged.	
Malkis, Allan	Thank you for reading my letter. As the impact of climate change becomes more evident we need to act to reduce not expand the extraction and burning of fossil fuels.
Response: Comment acknowledged.	
Mallagh, Michael	We strongly encourage you to find other means of transportation for your oil...it's a bad idea to build in our area.
Response: Comment acknowledged.	
Malloy, John	your colonial greed is at the cost of your grandchildren -just as our native elders prophesy stated= your ancestors have taught you wrong shame on you you can't breathe your $$$$ do you think water might be necessary i notice it's for sale not a human right in you fractured thinking you are not trustworthy or smart maybe you should sit down w/us natives and listen before you black gold suffocates your children a land person chante waste
Response: Comment acknowledged.	
Malloy, Lori	Please help us create a safe environment & legacy!!
Response: Comment acknowledged.	
Malnati, Peggy	This is too dangerous and unnecessary.
Response: Comment acknowledged.	
Malone, Crystal	TThe draft environmental reviews find that the risks of oil spills during rail transport, at the terminal site, and during marine vessel transport through Grays Harbor cannot be fully mitigated, and that if a spill occurred, the environmental damage would be significant. The oil industry should

Commenter Name	Comment
	not be shipping volatile Bakken crude and toxic tar sands from Canada by rail through ANY community...increasing the risk of an oil spill, fire, or explosion and exporting global warming harm. Thank you for reading my letter. Crystal K. Malone
Response: Comment acknowledged.	
Malone, Margaret Ann	Let us not create more fossil fuel outlets, rather lets promote environmentally sound sources of energy. Thank you for reading my letter.
Response: Comment acknowledged.	
Mammen, Christina	Thank you for reading my letter. Please let us all be able to ensure the changes necessary for the highest good of the entire world! God Bless America.
Response: Comment acknowledged.	
Manciagli, Julie	Stand up to the oil industry!
Response: Comment acknowledged.	
Mandell, Anne Marie	Please stop terminals proposed from being built to traffic crude oil & the like. It seems the oil we transport regularly cannot be contained as it is.
Response: Comment acknowledged.	
Mann, Patricia	Thank you for reading my letter. I have read about this transportation plan and have followed a similar matter here in the Bay Area. Today's environment has too many risks for citizens even to consider adding another one.
Response: Comment acknowledged.	
Manning, Thomas	Please do NOT facilitate the added burning of filthy fossil fuels and the acceleration of climate chaos that instead demands measures to reverse it.
Response: Comment acknowledged.	
Mannix, Sharon	Just do the right thing for our environment! and your children, you claim are most important in your lives!
Response: Comment acknowledged.	
Manter, Larry	we MUST protect our planet, our country, where we live, from this danger. We simply must!
Response: Comment acknowledged.	
Maples, Floyd	Big Oil, find another way to transport your oil. Railroads, there are more important things than making all the money you can. Both of you two industries, act responsibly and consider what your actions could and eventually most likely will cause to the environment of this region.
Response: Comment acknowledged.	
Maracle, Mariah	Having just moved to Marysville, I have noticed, that the trains that come thru here every 3 to 4 hrs, are loaded with coal. I think that coal comes from that deep & huge pit being mined in the Tri Cities area. I was told a few yrs. ago, when I saw the film, this Co. has a contract .with a dept.in Olympia. my apologies for not being specific..
Response: Comment acknowledged.	
Marcotti, Wendee	COME ON! Time to stop this crazy activity...
Response: Comment acknowledged.	
Maresca, Suzanne	Can we please stop pretending that we even need fossil fuels?
Response: Comment acknowledged.	
Mark, Robert	If you don't take positive action it simply means you are on their payroll.
Response: Comment acknowledged.	
Markey, Dana	I lived in Washington State. The lands and waters of the rivers and coasts MUST not be exposed to crude oil. The risks for leaks, spills, and explosions are too high. Oil and gas should be left in the ground.
Response: Comment acknowledged.	

Commenter Name	Comment
Marlowe, Jill	We desperately need to protect our fragile environment now from oil spills and the like. Please help us.
Response: Comment acknowledged.	
Maroon, Marcia	Please stop the crazy ways that crude oil is being handled. My children and grandchildren live in Plymouth, MN, a lovely home in a lovely neighborhood. The area has a series of wet lands and lakes. Oil trains run day and night with tremendous speed. It is my understanding that one of those trains crashed in Ill. creating huge firers. One of the very trains that run in a very populated in Plymouth. Please stop the madness! Don't make the problem worse by destroying delicate water ways and endangering more.
Response: Comment acknowledged.	
Marquez, John	This is not the legacy we should leave our children. Please oppose this expansion.
Response: Comment acknowledged.	
Marre, Marie	We live next to Olympic National Park, one of the most pristine areas of our country. Grays Harbor does too. Oil transport in this area negates everything we hold dear. It's too dangerous!
Response: Comment acknowledged.	
Marsh, Carol	Climate change is threatening the survival of the human race and countless other species.
Response: Comment acknowledged.	
Marshall, Rebel	There are better and cleaner energy sources than oil that will not destroy our planet. Use them before our planet is a useless rock.
Response: Comment acknowledged.	
Marshall, Victoria	I grew up walking Washington's Ocean Beaches. Please do not risk polluting them. They are a National Treasure.
Response: Comment acknowledged.	
Marston, Donna	Please do whatever is needed to stop the Westway/Imperium Crude-by-Rail. Surely the train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and
Response: Comment acknowledged.	
Martin, Abe	We need reform now from corrupted brought politicians and special interest eco and human health terrorists!
Response: Comment acknowledged.	
Martin, Carolyn	Please STOP the expansion of the two oil shipping terminals proposed for Grays Harbor, Washington!!! These terminals will put the health and safety of communities, the local economy, tribal cultures and our ocean and coastlines at risk!! REJECT THE PROJECT.
Response: Comment acknowledged.	
Martin, Martha E.	Do not let oil companies expand their oil transportation. They may gain profit but they cannot correct spill damage.
Response: Comment acknowledged.	
Martin, Peter	Thank you for reading my letter. I live a half mile from the tracks my self in Ohio !!! I watch the long trains go by at crossings and my drive in to Mansfield OH. And it go's threw town!!!!!!
Response: Comment acknowledged.	
Martin, Shawn	Thank you for taking the time to read my letter.
Response: Comment acknowledged.	
Marumoto, Kerry	As a resident of Idaho , I am concerned and opposed to the proposed increase of crude oil through my beautiful state. I am weary of seeing Big Oil reap the billions of dollars in profit while they use our infrastructure yet endeavor to minimize their tax contributions or pay nothing at all. In your decision process, please sit with your heart and conscious and make the decision based on protecting the health and well being of your fellow human beings and the natural world which we humans need to survive. Please remember that your decision will impact generations to come. Please vote with your heart and tell Big Oil that greed is not the true American way. Respectfully, Kerry Marumoto

Commenter Name	Comment
Response: Comment acknowledged.	
Marx, Janet	The last think Washington State or the world needs now is another oil port. Also, it is a poor investment as fossil fuel use will decline.
Response: Comment acknowledged.	
Marzocchi, George	Thank you for reading my letter. I wonder if at this time in the world we need to be discussing this instead of moving ahead!
Response: Comment acknowledged.	
Maseda-Gille, Sheila	NO MORE OIL industries or infrastructure in Washington state. We don't need or want more of this industry here. Why should we wreck our health and our clean climate for big oils profits. They can take their dirty business elsewhere if they want but not in Washington state.
Response: Comment acknowledged.	
Mash, Khair	Please help us to keep our country clean.
Response: Comment acknowledged.	
Masiques, Gita	Protect our communities from the dangers of increased crude oil traffic, oil spills and carbon pollution.
Response: Comment acknowledged.	
Mastro, Cynthia	Recent train crashes of cars filled with oil and the resulting fires have been disastrous; we don't need more of that.
Response: Comment acknowledged.	
Masucci, Donald	Do the right thing
Response: Comment acknowledged.	
Materi, Deborah	We need a sustainable present & future. Please redirect your R&D. At least consider it.
Response: Comment acknowledged.	
Matheny, Albert	We have to quit expanding our extraction and transportation and refining of oil. It's not going to be part of our future, and it may prevent us from having one. Wake up before it's too late!
Response: Comment acknowledged.	
Mathews, Tamara	This is an earthquake zone, what are you thinking!
Response: Comment acknowledged.	
Matlin, Thelma	Thank you for reading my letter.Stop the export of oil. Export of oil will increase prices here in the USA .
Response: Comment acknowledged.	
Matta, Daniel	Please take the time to think about all the lives this will affect. If you love yourself take care of the world you live in.
Response: Comment acknowledged.	
Matthes, Dakota	We are tired of dirty energy and pillage of the Earth. The time is now for clean, renewable and sustainable energy.
Response: Comment acknowledged.	
Matthews, Jonathan	We need to dramatically reduce carbon-based fuel consumption, and therefore its transport by trains.
Response: Comment acknowledged.	
Matthews, Rissa	We have one Earth. We must love her and protect her.
Response: Comment acknowledged.	
Mattice, Marge	Thank you for reading my letter. I am hoping for those to come after us, that we care for the earth and creation.

Commenter Name	Comment
Response: Comment acknowledged.	
Maurer, Lisa	We need to reduce and break away from crude oil, for all of our own safety and well being; Grays Harbor should not be exploited and destroyed in the name of transporting dirty oil through Washington! Thank you for reading my letter.
Response: Comment acknowledged.	
Mauro, Laurie	Thank you for reading my letter. Crude oil comes through my town--it's dangerous and unnecessary! We need to move away from burning fossil fuels and embrace the energy of the sun.
Response: Comment acknowledged.	
May, Carol	This is disgusting! Really, where is the oil going? China?!! Our country is sick - all for the sake of $ to feed the pockets of the rich in our country who do nothing to contribute to education and healthcare (physical as well as mental). They probably ar
Response: Comment incomplete.	
May, Lana	I live one block from the Metra rail line in Mount Prospect and can hear freight traffic traveling at high speed during the night. I do not want a repeat of the Lac-Megantic, Canada, rail disaster anywhere.
Response: Comment acknowledged.	
May, Maureen	I used to live near Puget Sound. Western Washington is a beautiful place and needs to be kept safe from this kind of development. Thank you for reading my letter.
Response: Comment acknowledged.	
Mayer, Kellly	Thank you for reading my letter. We have enough oil terminals in the U.S. We do not need any more and do not need the threat of one of these spilling into our marine waters for the animals safety and our safety.
Response: Comment acknowledged.	
Mayer, Susan	Our nation needs to focus on renewable energy and truly clean energy, NOT mar our beautiful coastal harbors and landscapes to transport filthy oil that poses a danger to our communities and promotes global warming. NOW is the time to stop the trainwreck.
Response: Comment acknowledged.	
Mayotte, Mark	The oil industry dreams up one horrible idea after another, all environmental disasters poised and waiting to happen. Let's end this long nightmare once and for all.
Response: Comment acknowledged.	
Mayo-Velasco, Judy	Our coastal Washington areas are not up for utilizing as a pass-through for pollution and oil trains just because big oil wants to add profit. As a resident of Washington for 67 years I have a vested interest in keeping the air, water and soil clean and healthy for my children and grandchildren. Do not for one minute assume this is negotiable or up for sale to the highest bidder -it is not. We live here because it is a beautiful and healthy state and we work hard to keep it that way.
Response: Comment acknowledged.	
Mazza, Antonia	Why do we need further environmental reviews? We already know the risks by witnessing all those train explosions in many states. Who are those state officials that allow such risks to our health and environment? Do they answer to taxpayers or BIG OIL?
Response: Comment acknowledged.	
Mazza, Ronald	I've been a resident of Washington for 60 years. I don't want to see the Evergreen State become a massive pipeline for fossil fuels.
Response: Comment acknowledged.	
McAbee, Colleen	Thank you for reading my letter. This is a tragedy waiting to happen. Stop it in its tracks - pun intended.
Response: Comment acknowledged.	
McAboy, Chris	Please do not allow any terminals in Grays Harbor or the rest of our state. We should be investing in renewables- not fossil fuels.
Response: Comment acknowledged.	

Commenter Name	Comment
McAlear, Elissa	Protect our environment. The oil from these terminals will not be used to keep our US oil prices down but could have a disasterous effect on wildlife and the harbor's balance.
Response: Comment acknowledged.	
McAllister, Pamela	The DEISs, FOR WESTWAY AND IMPERIUM! Here is go again with man made Investors. To build a oil confinery . RISKY! OF EARTHQUAKES! Simple just don't want it point blank! train accidents high noise, not considering air pollution harmful to to the Ozone, heavy oil tanker trucks, very high risk oil spills in the ocean killing and mammals, birds "etc "! Please? I ask? Because I truly care of the devastation that this will cause.!!! This is GODS WORLD, he created not mans all mankind all you want to do is destroy this world and let me say?!!! Mankind, "A FINE LINE THAT IS SO THIN, YOU KNOW YOURSELF WHAT DAMAGE THIS WILL CAUSE . YOUR NOT NO DUMMIES!! BUT, YOU HAVE TAKEN THIS WORLD TO THE POINT HUMAN LIFE AND ALL ANIMALS LIFE. SERIOUSLY SELF DESTRUCT!!! OH YEAH! Not to mention that mankind you have taken something that doesn't belong to you. And, that in this investment, wait till judgement day when you face the one that you took from like a thief! Face and ask?? GOD! Amen.
Response: Comment acknowledged.	
McBride, Mikki	Humans are killing this earth we live on. How much longer will it be viable to even sustain life? Stop this nonsense now. We do not need oil. There are other ways that are cleaner and more gentle to our planet.
Response: Comment acknowledged.	
Mcbride, Thomas	Face it. It's planet-saving time.
Response: Comment acknowledged.	
McCarthy, Joe	don't allow Oregon's rail infrastructure to be used for transporting fossil fuel. Ever. Please protect our planet from profit driven motives that threaten our future generations - in order to line rich people's pockets today.
Response: Comment acknowledged.	
McClelland, George	Oil is a loser. Nicola Tesla gave us technology over a hundred years ago that made oil obsolete but the powers that rule this world kept it secret and destroyed him (and others after him). Technologies for "free" energies are emerging which will make environmentally destructive ways of producing energy obsolete. Those technologies are so close to mass production that I wouldn't invest one penny in oil of any kind. Don't further ruin our environment and health by approving anything relating to oil. Thank you for reading my letter.
Response: Comment acknowledged.	
McClendon, Joby	If I understand correctly, our continuous wars in the Middle East are to protect the oil holdings of wealthy importers of oil. You now want to develop more massive exportation of oil, which means US oil companies import oil from the Middle East and elsewhere, and then export it to other countries. Why? Why must Americans be constantly exposed to oil spills and other contamination, so that the wealthy oil companies can make an even greater killing?
Response: Comment acknowledged.	
McCloskey, Deborah	We don't need such dangerous transport of oil which should stay in the ground.
Response: Comment acknowledged.	
McCloud, Nan	They keep talking about the quake we're going to have sometime soon. A mega quake. Is it really a good idea to build a pipeline to Coos Bay?
Response: Comment acknowledged.	
McConnell, Constance	Keeping our planet habitable for human beings requires sacrifice now....keep fossil fuels in the ground!
Response: Comment acknowledged.	
McCormick, Joseph	Stop these risky rail transports through our countryside!! This is putting the environment at serious danger of horrible pollution!
Response: Comment acknowledged.	

Commenter Name	Comment
McCormick, Susan	This rampant rape, pillage and plunder of the earth must stop. Why not sooner (now) than later (when the devastation is inescapable)!
Response: Comment acknowledged.	
McCoy, Marthe	Actually I support this action as long as Obama refuses the pipeline being built.
Response: Comment acknowledged.	
McCracken, Linda	I don't want dangerous explosive materials travelling through areas that are highly populated or near schools or near where it can destroy tribal cultures or marine life.
Response: Comment acknowledged.	
McCulloch, Martha	I live near the Hudson river, which is threatened by the continual shipment of oil through our communities right beside the river. No American communities should be put in danger just so that the oil companies can ship our oil to other countries!
Response: Comment acknowledged.	
McCullough, Linda	My beautiful Alabama Gulf Coast area has been damaged and will not recover in my lifetime because of oil. Clean energy is the way. Stop these projects.
Response: Comment acknowledged.	
McDaniel, Barbara	There must be limits to building oil pipelines and where they are allowed to build. We have a beautiful country. Lets not destroy it. Also there must be proper safeguards in the rail/truck transport of fuel.
Response: Comment acknowledged.	
McDermott, Kevin	Thank you for reading my letter. Please do the right thing!
Response: Comment acknowledged.	
McDonagh, Janet	This country is overly dependent on petroleum based products which are dangerous to the environment - land, water, air, people - and dangerous to transport.
Response: Comment acknowledged.	
McDonal, Frances	I live in a retirement community directly across the street from a very busy railroad line. I see the tanker cars going by and wonder if this is the day there will be an accident. Those of us using walkers and wheelchairs will be out of luck. I urge you to stop the two terminals proposed for Grays Harbor. Thank you for reading my letter.
Response: Comment acknowledged.	
McDonald, Janet	The oil industry does not have a safe record of transporting oil. Bringing oil to Hoquiam has it passing through miles of Pacific County and pristine environment. We do NOT want to endanger our environment for their profit. Jobs, homes, and lives will be at risk. The potential benefits for a few--mostly out of area--people are not worth the potential risks it would bring. Please REJECT the proposed oil terminals in Grays Harbor.
Response: Comment acknowledged.	
McDonald, R.	Oil transport is too dangerous. An accident will kill delicate marine life & habitat, people will lose jobs, etc. What a mess for ALL!!!!! STOP it, come to your senses.
Response: Comment acknowledged.	
McDonald, Victoria	Please continue your efforts to combat climate change. Stopping Keystone XL pipeline was a courageous action: the next step is protecting the coastlines, in this case the West Coast. Thank you for reading my letter.
Response: Comment acknowledged.	
McDonnell, Susan	We need clean energy, not products that come out of the ground. Leave them there and use what God gave us!
Response: Comment acknowledged.	
McDonough, Callahan	Thank you for reading my letter. We are at a critical point awarness and action need to be one. Stop crude oil transport now !
Response: Comment acknowledged.	

Commenter Name	Comment
McElroy, Cameron	No More Oil Transport!
Response: Comment acknowledged.	
McFadden, Maryellen	Stopping oil transportion is critical to the Pacific northwest!! I know! I lived and worked in the locations proposed by the oil industry and experienced the 1949/1968 earthquakes!!!! The Cascadia fault line is not fiction, it's a fact!!!!!
Response: Comment acknowledged.	
McGarry, Carl	oil companies cannot be trusted in case of a spill.
Response: Comment acknowledged.	
McGee, Pennie	No oil transports through Oregon!
Response: Comment acknowledged.	
McGhee, Candace	Thank you for reading my letter. Stop pretending that oil transportation by rail and oil tanker is safe in any way.. History proves it not to be so. It's always our tax money that ends up cleaning up your messes by way of all the subsidies that you should not be getting. I am totally against ANY oil in anyway. Green, green, green. This is the 21st century... Act like it and use all the monies you made and go solar and wind and whatever else.
Response: Comment acknowledged.	
McGillicuddy, Geri	We need to move towards a greener world This export terminal is not the answer. Thank you for reading my letter.
Response: Comment acknowledged.	
McGinn, Susan	We have a chance to stand up to the oil industry now and slow the dangerous expansion of oil transport. Oil companies want to expand their Northwest operations by building oil shipping terminals on Washington's coast and turning our region into a thoroughfare for crude oil transportation by rail and oil tanker. Take action now to stop two terminals proposed for Grays Harbor, Washington, and protect your community from increased crude oil rail traffic, oil spills and carbon pollution. The proposed oil shipping terminals; the explosive, dangerous oil trains needed to feed them; and the continual parade of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of communities, the local economy, tribal culture, and our ocean and coastlines at risk. This is not the future we want. A public comment period is underway right now on draft environmental reviews of the risks and harms from the proposed Westway and Imperium terminals in Grays Harbor. Let the Washington Department of Ecology and the City of Hoquiam know that we understand the risks we face with these oil industry proposals, and we don't think they're worth it. The draft environmental reviews find that the risks of oil spills during rail transport, at the terminal site, and during marine vessel transport through Grays Harbor cannot be fully mitigated, and that if a spill occurred, the environmental damage would be significant. Whether you live five or five hundred miles from Grays Harbor, the oil industry plans to bring more dangerous types of oil through the region, including volatile Bakken crude and toxic tar sands from Canada, increasing the risk of a derailment, collision, spill, fire, or explosion...putting people in your state at risk.
Response: Comment acknowledged.	
McGinnis, M.	Have you noticed that Canadians don't want this oil, THEIR oil to be moved through Canada? Their government is listening - why should we handle someone else's dirty laundry???
Response: Comment acknowledged.	
McGrann, James M	It has gotten to the point where for the rich there choice drug is avarice and greed, it's like heron to them, it's anything for a buck, no matter how it impacts life or the planet. "What good is it to be wealthy in a dead world."
Response: Comment acknowledged.	
McGuire, Letitia	No more oil in Washington! You should be ashamed of yourselves. Promote alternative energy!!
Response: Comment acknowledged.	
McHenry, Sue	We are trying to become energy independent and have made progress, but we still import too much. Let's concentrate on that. Let's save our oil resources for important future uses, like plastics for medical uses. Let's move into the future, not continue on in the past.

Commenter Name	Comment
Response: Comment acknowledged.	
McHugh, Margaret C.	Clean energy only!
Response: Comment acknowledged.	
McIntyre Jr., Charles	Enough, no more oil traffic ENOUGH! SAVE OUR WATERWAYS!!!!! NO MORE TANKERS TO SPILL and RUIN our COAST!!!!!
Response: Comment acknowledged.	
McIntyre, Terry	keep it in the ground
Response: Comment acknowledged.	
McKee, Donna	This land is OUR land, We the People of the United States! We love and cherish it; it nourishes and sustains us, now and for future generations. It is a public trust and our legacy to America's children. Countless Americans have died to protect it and we will NOT allow it to be spoiled and raped for the filthy profits of rapacious corporations and foreign interests - or for any reason! America is not a resource extraction colony!! We will not allow it to be turned into a hazardous, polluted, despoiled thoroughfare for yesterday's fossil fuel industry's crude oil transport! This is NOT the future we want, and it is not a future we can even survive with ANY quality of life! It is totally unacceptable! Building more big infrastructure projects to transport yesterday's energy sources is the wrong way to meet today's and tomorrow's energy needs. Export terminals for oil and gas are not only dangerous and horrifically polluting, but they are a BAD DEAL for America and, especially, for the American people, as a whole. It will actually RAISE oil and gas prices for Americans and increase our dependency on foreign sources of oil, once again! Frankly, it is stupid and foolish and should be a no-brainer to REJECT, just based on it's merits, or lack thereof, alone! America is not a sacrifice zone for a few obscenely rich billionaires and the corporate liability shields that they hide behind! They are the ONLY ones who will profit, read PROFITEER, from this inane, dangerous and destructive industrial development. However, We the American People, will be the ones to pay the price, literally and figuratively! And We REFUSE to do that, or to allow that to happen. This is the Line-in-the-Sand for the outlaw, sociopathic, mendacious, murderous and rapacious fossil fuel industry. This industry must not be permitted to ship volatile Baaken crude and toxic tar sands from Canada through ANY of our communities, guaranteeing the high risk of fatal explosions, massive fires, filthy, damaging oil spills, and exporting global harm! Oh yes, and higher oil/gas prices for Americans. What a "deal"?! A very, very bad and incredibly stupid deal. There are MUCH better ways to meet our energy needs, as a nation, and for Washington state, as a state. Washington State should continue to lead on safe, renewable clean energy solutions and say 'NO' to more oil and coal! We demand clean, renewable energy from regenerative sources, not more havoc and carnage and rip-offs from the dinosaur fossil fuel industry that is crashing around the globe in its death throes, causing as much harm as possible in a futile bid to stave-off it's inevitable, immanent extinction! It's either them or US, and by that I mean ALL of the rest of us on our planet, our mother, Earth. I urge you to do the right thing for the future of Americans and, ultimately, for humanity, before it is too late for all of us.
Response: Comment acknowledged.	
McKee, Gerald	We don't need this kind of impending disaster here in Oregon!
Response: Comment acknowledged.	
McKee, Robbie	Thank you for reading my letter.THIS HAS TO STOP! WE NEED CLEAN, RENEWABLE ENERGY. LEAVE OIL IN THE GROUND.
Response: Comment acknowledged.	
McKee, Sarah	Fossil fuel is an angry god. It demands human sacrifice.
Response: Comment acknowledged.	
McKenna, Sharon	Thank you for reading my letter. I don't want hazardous conditions near where I live. I would not feel safe where I live.
Response: Comment acknowledged.	
McKenne, Michael	No more poisoned rivers ,please

Commenter Name	Comment
Response: Comment acknowledged.	
McKenzie, Constance	The fragile beauty of the Pugent Sound area is a treasure for future generations. Protect the region from probable oil spills resulting from fuel transportation. Thank you.
Response: Comment acknowledged.	
McKeogh, Katherine	It is important that we take precautions to protect the health of our oceans and other human lives. The proposed oil transport plan will put both of these things in great danger! It's not worth it.
Response: Comment acknowledged.	
McKinnie, Robert	We need to start improving matters rather than making them worse.
Response: Comment acknowledged.	
McKinnon, Michael	Protect our water, air and fisheries. No to expansion of oil transport in Washington.
Response: Comment acknowledged.	
McKnight, Alan	Fossil fuel burning must be reduced drastically to avoid severe climate change and flooding. Keep fossil fuels in the ground, for use only in emergencies.
Response: Comment acknowledged.	
McKnight-Lupes, Jennifer	Thank you for reading my letter. I live in an area with oil trains, where legislation has permitted a second track going through the heart of the community, so I know how frightening this expansion is for the local citizens!
Response: Comment acknowledged.	
McLaughlin, Emily	Keep that crude oil and pollution out of the water I surf in and share with all the marine animals and fish up here in the PacNW.
Response: Comment acknowledged.	
Mclaughlin, Kathleen	Gray's harbor is a beautiful location which does not deserve to be desecrated by the oil and gas industry. Its people deserve better and the Earth deserve better. Please think about future generations.
Response: Comment acknowledged.	
McLaughlin, Mark	I surf at Westport. The last thing we need is an oil spill in the water there or on the land near there.
Response: Comment acknowledged.	
McLaughlin, Michael	Citizens of every coastal community from Northern British Columbia to Bellinngham and other ports proposed for the high pollution so destructive of ocean ecosystems, have refused to become pools of oil. This technology is passe' it has changed our climate in ways that are so destructive that molluscs can no longer make shheel, shaking the very oceanic food chain. It is long past time tthat all extraction of fossil fuels be ended, and the last great harbor of Waashington must not be sacrificed for corporate/privavte short-term financial gain at the expense of life itself. Indigenous peoples,, usually never coming together to voice their concerns , have all banded, and we who have any scientific understanding and any care for the environment we live in, band together with teir wisdom: there must be NO more extraction and transport of a substance that is overheating the entire earth, acidifying the oc eans, poisoning wherever it is spilled, makking the air unbreathable wherever it is used (the USA does not understand the prnblems with the cloud of pollution often enveloping southeast Asia from India to China, but over a billion humans finally do. The madness of political violence and hate rising in the USA is in part due to the greed and grasping of the fossil fuel industry. End the poisonous fossil fuel industry, and certainly DO N OT allow the pollution of the Washington coast and largest estuary.
Response: Comment acknowledged.	
McLaughlin, Nelda	Please protect us against the greed of the dirty oil industry
Response: Comment acknowledged.	
McLean, Celeste	Thank you for reading my letter. Please take care of the environment and the people ---- the children !

Commenter Name	Comment
Response: Comment acknowledged.	
McLean, Michael	Transporting oil through our rural communities and neighboring Colfax puts our rivers and natural environment at great risk. Also, that area lies over an earthquake fault. Find another, safer, way!
Response: Comment acknowledged.	
McLemore, Pam	Please do not allow oil to be transported through our country.
Response: Comment acknowledged.	
McMahon, Carol	After recent rail accidents involving tanker cars I don't think the oil companies should be expanding their Northwest operations
Response: Comment acknowledged.	
McMahon-Wilbur, Stacy	Please don't build oil operations in Grays Harbour
Response: Comment acknowledged.	
McManus, Kathleen	It is quite simply time to stop the use of fossil fuel. It is no longer viable economically and actually taking in the costs to the environment and health hazards, it never was! Fossil fuel use has to be stopped on all tracks, not just rail transport.
Response: Comment acknowledged.	
McMillan, Suzanne	Please stop the risk to our people from the transport of oil. The risks are enormous. We don't need them.
Response: Comment acknowledged.	
McNally, Susan	My personal feeling is this endeavor is not worth the risk/reward results. Gains us little in a world of increasing alternative energy options and creates a giant terrorist target and environmental risk. STOP bowing to oil lobbyist pressures.
Response: Comment acknowledged.	
McNeil, Sherry	it is imperative that we move away from fossil fuels and not become more increasingly entrenched in this dirty energy. Our efforts should be on renewable energy only.l
Response: Comment acknowledged.	
McPeak, Cynthia	Don't the lives of living creatures, (all of us animals), and the earth have more importance than "short term profits" for the already obscenely wealthy? We should be embracing clean renewable technology for the survival of any sustainable future. Thanks.
Response: Comment acknowledged.	
McPhail, Robert	Stop turning our beautiful country into a dumping ground for greedy people and corporations.
Response: Comment acknowledged.	
McPhedran, Letty	Please do not build terminals in Gray's Harbor.
Response: Comment acknowledged.	
McQuade, Gleni	Thank you for reading my letter. This is too important...we must act now!
Response: Comment acknowledged.	
McRae, Jean	Let's save the land, save the waters, and future for our children.
Response: Comment acknowledged.	
McReynolds, Cindy	Exxon knew oil was a major contributor to global warming used this knowledge to conspire to increase global temperature to open new sources for oil extraction. NOW is the time to cut back oil usage rather than exporting it with all its attending risks to human lives and ecosystems.
Response: Comment acknowledged.	
McWilliams, Cynthia	We must move towards alternative energy!
Response: Comment acknowledged.	

Commenter Name	Comment
McWilliams, Cynthia	The US has had too many oil spills already, and we don't need more oil being transported, risking spills and accidents along the way. Please don't continue to push the US towards this hazardous future. Our children deserve better.
Response: Comment acknowledged.	
Meacham, Thomas	This is not a safe or sustainable direction for our country.
Response: Comment acknowledged.	
Mead, Caroline	Thank you for reading my letter. Save the environment. Study and realize how dangerous the expansion of oil transport is. It's scary! Very dangerous! Stop it now! Save the environment! Don't make people sick. Protect the planet. STOP the oil indusry.
Response: Comment acknowledged.	
Meadows, Erin	We finally have to learn from past mistakes. This practice needs to stop.
Response: Comment acknowledged.	
Mear, Bertha	train cars over turning that carry dangerous cargo like oil and other poison. should be more safely transported. little regard is used when these companies ship their dangerous, lethal cargo more laws and limits should be put in place. that includes ships
Response: Comment acknowledged.	
Medeiros, Joe	Stop this madness!
Response: Comment acknowledged.	
Medley, Robin	I think you are trying to ruin our country without a single thought about the taxpayers concerns. You could care less that we have to live with the destruction.
Response: Comment acknowledged.	
Meece, Tanja	I do not want to live in a place where oil is more important than clean water. There was an oil spill up river from where I live and that was bad, but to know that noone on the Western side of Washington cared was worse. It is time oil companies realized that children and animals are more important than money, and that potable drinking water is priceless. Please be proactive, it's not too late to say "NO!"
Response: Comment acknowledged.	
Megenity, Douglas	I'm very concerned about the expansion of oil transport in in the Northwest at serious risk. It could in time negativity effect the health and safety of local communities, economies, tribal culture as well as ocean environments and their coastlines.
Response: Refer to Draft EIS Section 4.7, *Impacts of Resources,* for a discussion of potential impacts on human and the natural environmental as a result of the proposed action.	
Mehlhorn, Michelle	keep it in the ground.
Response: Comment acknowledged.	
Mehlman, Barbara	I am very much opposed to the expansion of oil transport through western Washington due to environmental and human health concerns.
Response: Comment acknowledged.	
Mehring, Valerie	The risk to communities from these oil trains is unacceptable.
Response: Comment acknowledged.	
Meier, Randy	As a lifelong Puget Sound area resident, I have been visiting Grays Harbor for all of my 63 years. Presently I have a condominium at Ocean Shores. In this time period the water quality has degraded to a ridiculous point in Grays Harbor. The proposed terminals would create added traffic, and future spills are guaranteed. This is a scenario that would destroy Grays Harbor ecosystems once and for all. It is time for Washingtonians to stand up for clean energy. It is not time to destroy Grays Harbor by stupidly exporting unprofitable high carbon oil to folks who would rather go clean energy anyway. Please say no to the oil companies this time.
Response: Comment acknowledged.	

Commenter Name	Comment
Meiland, David	Completely opposed to oil by rail expansion in our state!
Response: Comment acknowledged.	
Melaas, Douglas	Thank you for reading my letter. In addition to stopping these dangerous pipleine projects, please consider backing Senator Sanders' bill to stop extraction of fossil fuel resources from federal land.
Response: Comment acknowledged.	
Melamed Smith, Karen	An oil export terminal situated in Grays harbor, WA would put that region and the transportation corridor to it at far too much risk. Please reject this proposal. Thank you for reading my letter.
Response: Comment acknowledged.	
Mele, Lucia Tallchief	Please keep our lands and water safe, clean, and unspoiled for all of us, including the Seventh Generation.
Response: Comment acknowledged.	
Melin, Dan	Thank you for reading my letter. This means a lot to me
Response: Comment acknowledged.	
Melnick, MA	The risks to the environment, people, and local economy are too great, and the benefits are only for oil stockholders. Please stand up for us.
Response: Comment acknowledged.	
Melton, Joan	The many explosions, spills, and pollution from transporting crude oil is outrageous. And the total disregard for the people affected is disgusting. This CANNOT continue! These proposed terminals need to be rejected.
Response: Comment acknowledged.	
Melton, Nancy	Your rail cars are dangerous. Spills are likely. Pollution is definite. We the people of Washington do not want you here since you so often damage the environment for profit. NIMBY. Therefore stop, and be gone away from the Pacific Northwest.
Response: Comment acknowledged.	
Meltzer, Susan	Thank you for reading my letter. This is too risky and should be stopped.
Response: Comment acknowledged.	
Menkes, C	If we want to leave a planet for future generations, we must act now!!
Response: Comment acknowledged.	
Mercaitis, Pat	Thank you for reading my letter. This REALLY needs to be looked at!! There doesn't need to be an either or. We can deveope alternative ways of "fueling" our world.
Response: Comment acknowledged.	
Merchant, Deb	Intelligence cannot be demonstrated by use of more oil. Let's use our brains, hearts and intellect to use the power of the sun to power our human existence. Stop using oil, stop it now!!!
Response: Comment acknowledged.	
Meredith, Lauren	Don't let oil companies wreck what you hold dear. The recovery from oil catastrophes is never fast, and never all that anyone would like. The errors cost lives, livelihoods, and big bucks - and they'll never give you enough. Tell them you'd be happy to pass through shipments of sunlight and wind, though!
Response: Comment acknowledged.	
Merker, Fran	prices for renewables are falling fast so we will have no need for dirty fossil fuels very soon. Stop these dangerous projects altogether. Our futures are on the line! Thank you for reading my letter.
Response: Comment acknowledged.	
Merrigan, Anita	We are not going to be able to burn fossil fuels any longer. Investing in transporting fossil fuels is a complete waste of time and money. Thank you for reading my letter.
Response: Comment acknowledged.	
Merrill, Margaret	All fossil energy sources belong in the ground. If we are to survive climate change we MUST switch to solar, wind, and other renewable, non-polluting sources of energy. Thank you
Response: Comment acknowledged.	

Commenter Name	Comment
Merritt, Christine	We are not willing to risk the pollution possibilities.
Response: Comment acknowledged.	
Merryman, Arlene	We need this protection, as does the entire environment.Thank you for reading my letter.
Response: Comment acknowledged.	
Merryman, Elizabeth	Thank you for reading my letter and considering the future of our planet.
Response: Comment acknowledged.	
Mershon, Don	Leave oil in ground. Support renewable energy now or suffer economic disaster when it runs out! (And a parade of accidents and health consequences in the meantime.)
Response: Comment acknowledged.	
Mertens, Kathy	Oregon is one of the few ecologically natural states left. Taking the oil train through Oregon is a pure act of greed and will cause permanent damage
Response: Comment acknowledged.	
Messenheimer, Kim	Kill Koch brothers
Response: Comment acknowledged.	
Messina, Jennifer	Don't need it. Don't want it. Oil folks, why don't you all become solar folks and all our grandchildren will have a future.
Response: Comment acknowledged.	
Messinger, Lisa	Look to the future of sustainable energy, and leave this dirty oil in our past!
Response: Comment acknowledged.	
Metcalf, Sabre	Enough of jeopardizing our health and wild places in the name of greed!
Response: Comment acknowledged.	
Meyer, Frank	And they get tax money to do it.
Response: Comment acknowledged.	
Meyer, Katherine	We are past the point of using fossil fuels. We now know that our survival as a species depends on leaving all fossil fuels in the ground. To court ecological disaster, and hasten the arrival of a dire time in human history, for the sake of corporate profits, is inexplicable and horrific. Please stop the two terminals in Grays Harbor. Thank you for reading my message.
Response: Comment acknowledged.	
Meyer, Peter	As a PhD economist, I have spent 40 years conducting economy no mic impact analyses of public policies and projects. The port development does not pass the critical cost/benefit test when time horizons and accident risk are appropriately considered.
Response: Comment acknowledged.	
Mezynski, Estell	As a former Ohio resident, I am aware of what big oil has been doing to our earth with both cracking and transportation of crude . This is an abuse of our earth!!
Response: Comment acknowledged.	
Mgrath, T	Greed kills!!!!!
Response: Comment acknowledged.	
Miale, Ruth	Thank you for reading my letter. The dangers of these pipelines, hugely wider bore, more dense product, m ore toxic product; I don't believe it's wise to expose people, our land to the risks involved in laying open our landscape and infrastructure to this very risky enterprise. The oil trains have proved to be unsafe. I'm only a lay person and I am sure that the transport of a material with a density, viscosity, and a volatility unlike any we have transported before would call for much stronger cars. The swaying of this liquid inside the tank introduces forces which challenge our tracks which never were acted upon in these vectors. I believe the costs that would be involved in making our tracks safe to handle these shipments, which would follow our rails through o country

Commenter Name	Comment
	side, land we use or should count on for food production in the future, and our population, make this concept and this industry impossible to accomodate. The weight and cost of the tanks if they could be made safe enough also add to the stresses on our tracks, and on the rail road grades not built for this kind of passage. You may know nothing about railroads and physics, and I have only a couple of physics classes under my belt. My dad worked for Mobil Oil, as a senior research chemist with volatile fuels. I have heard enough to know that you are not paying attention to the most basic of facts that even I can suss out. DO NOT SELL OUT OUR SAFETY and THE SANITY OF OUR NATIONAL GOVERNMENT for the dollars coming your way or the sales pitch these folks are making. Thanks so very much for your time! Ruth Miale
Response: Comment acknowledged.	
Michael, Beverly	HORRIBLE... NO LIMIT TO GREED...
Response: Comment acknowledged.	
Michaels, Laurel	Thank you for reading my letter. This is an important issue for the quality of life in our country in years to come.
Response: Comment acknowledged.	
Michalek, Linda	This sort of reckless transport must stop!
Response: Comment acknowledged.	
Michaud, Lizann	Oil spills will happen, and shipping is an intrinsically polluting and noisy business. Please have this realistic perspective in mind when making decisions.
Response: Comment acknowledged.	
Michetti, Susan	Can you believe that in WI the people in Dane Co around Madison wanted an insurance policy to guarantee funding for cleanup of any accident and that Governor Scott Walker quickly passed legislation to remove that right of local government to control what happens locally? It happened. This is Scott Walker. This is Enbridge who is not a US company, who does not have a history of good maintenance, who still hasn't cleaned up the oil spill in the Kalmazoo in State of Michigan. These are bad actors. Con artists who take the value away from the resources of the people. Con artists who do not want to pay for the damages that they inflict, but totally promote society to pay for the costs of private profits--the only form of socialism that is truly insidious that of socializing the costs of private irresponsibility and private profits.
Response: Comment acknowledged.	
Mickelsen, Carol	--'EXACTLY'!?-'HOW MANY YRS.'!?-SHOULD WE-'HAVE TO'!?-BE CONCERNED ABOUT'!?/-&/OR'!?_'WORRY'!?-ABOUT TH: 'HEALTH & WELFARE'!?-OF THE: 'COASTLINE/WILDLIFE'!?-NO TO MENTION'!?-OUR-OWN HEALTH'!??-JUST TO PUT: '$$$'!??-IN TH: 'POCKETS'!?-OF THE-'FEW'!??---('Y
Response: Comment incomplete.	
Middleton, ED	present levels of pollution on this planet will take thousands of years to solve. adding additional sources is unwise.
Response: Comment acknowledged.	
Mietus, Norbert	It is time that the use of fossil fuels is terminated including its massive transport around the globe causing even more irreversible environmental damage.
Response: Comment acknowledged.	
Mikan, Edward	STOP THE DANGEROUS, DESTRUCTIVE, OIL TRANSPORTS ACROSS OUR COUNTRY!!!! U S ARMY VETERAN
Response: Comment acknowledged.	
Mikesell, Sara	There will always be accidents during oil transport. Save our land, water. wildlife and populace by banning tankers, barges, and trains carrying oil.
Response: Comment acknowledged.	
Milcarek, Thomas	Are we going to let the new "God",Profit,destroy all that is good about this life and planet?
Response: Comment acknowledged.	

Commenter Name	Comment
Milich, Lenard	A simple, one-word question: why?
Response: Comment acknowledged.	
Miller, Andy	Our government should be supporting a sustainable energy solution. That is were the true economic growth is. Fossil fuels are literally a dead end. Thank you for reading my letter.
Response: Comment acknowledged.	
Miller, Anthony	I knew this would happen!
Response: Comment acknowledged.	
Miller, Brad	Don't allow this disaster-in-waiting!
Response: Comment acknowledged.	
Miller, Catherine	We need to scale down dependence on fossil fuels, not build new terminals and risk further contamination of land and water!
Response: Comment acknowledged.	
Miller, Cindy	We don't need your dirty oil polluting our beautiful coast!!
Response: Comment acknowledged.	
Miller, David	Thank you for reading my letter. Now support renewables!
Response: Comment acknowledged.	
Miller, Jay	To continue down the same road of reliance on oil and gas points us to not an uncertain future, but a future of certain warming, environmental degradation, resource shortages and human disruption. The proposed expansion of Northwest terminals not only leads us faster to that future but puts, at risk, immediately the northwest. Whatever the promises from the oil industry, history and experience tells us they cannot prevent spills nor other damage. Results will happen. The voices of the people must be heard above those of the oil industry. This is our land, and not just yours.
Response: Comment acknowledged.	
Miller, Keith	Please encourage or force investment in green energy production
Response: Comment acknowledged.	
Miller, Mandana	Please think of the impact that this action will have on the health of our children, grandchildren and our environment. Thank you for hearing our concerns. We are on this planet for a short time, but our actions will leave marks on our this fragile earth
Response: Comment acknowledged.	
Miller, Marjorie	We don't want this in our backyard!
Response: Comment acknowledged.	
Miller, Robin	Please do not sacrifice the safety of this community to dirty oil.
Response: Comment acknowledged.	
Miller, Susan	Look, we KNOW we don't have to transport sun and wind. Let's use them for energy now!!!
Response: Comment acknowledged.	
Miller, Susan	This is an important environmental health issue.
Response: Comment acknowledged.	
Miller, Suzanne	One more oil tanker explosion is in your power to prevent. Please.
Response: Comment acknowledged.	
Miller, Tacey	It's short sighted to sacrifice Grays Harbor (or any place along the WA Coast) for oil shipping terminals. It's not worth the environmental risk. In addition, I thought domestic oil production was not intended for the highest bidder and exporting but for national security. Seems the oil industry is one again more interested in profits than any long term view of what's best for the citizens and communities. Grays Harbor will make more money in the long run by preserving the natural environment and promoting tourism.
Response: Comment acknowledged.	
Miller, Wendy	Keep us safe, stop the shipping of dangerous oil.

Commenter Name	Comment
Response: Comment acknowledged.	
Millis, Susan	Dear Sirs and Madams, No more terminals for fossil fuels. No new terminals at Grays Harbor. Washington's waterways and land thoroughfares are full enough of pollution from coal and oil. We need to end our dependency and not support other nations using fossil fuels, especially the gigantic needs of China. Their pollution is our pollution. Please encourage innovators and innovation in clean energy. Be bold and set the new standards for change. Respectfully, Susan J Millis
Response: Comment acknowledged.	
Mills, Peter	Thank you for reading my letter. In Maine we're well-aware of the danger posed by these oil trains because of the explosion and fire that devastated downtown Lac Megantic in Quebec Province. The environmental risks of a spill of Bakken crude are also enormous. The passage of trains and tankers laden with Bakken crude is not something any town, city or harbor should permit.
Response: Comment acknowledged.	
Mills, Richard	No crude compromises!
Response: Comment acknowledged.	
Mills, Roger	Let's work together to tell big oil that there are a lot of people who do not want "big oil forever".
Response: Comment acknowledged.	
Mimms, MP	I oppose the installation of these crude oil pipelines. They ruin the habitats of many species and destroy the quality of life on the coastlines of our magnificent country such as Washington state. Please don't allow this to happen. It will do irreversible damage. Thank you.
Response: Comment acknowledged.	
Mindell, Janice	To WA state Dept. of Ecology, City of Hoquiam and interested oil companies: The oil companies have not proven that oil terminals and the transportation of oil is safe enough to have near any environment...not a town, not a river, not a beach is safe from oil spills, oil explosions, oil leaks and oil air pollution. Do not build your terminals or your railways in our state with its precious wilderness and wildlife, clean rivers, clean beaches, delicate marine life, and clean air. We do not want you here putting our lives, our health and our environment at risk. We do not need you here.
Response: Comment acknowledged.	
Minich, Chris	Are these oil shipping terminals and rails really the answer to creating a multitude of good paying high tech jobs our country needs to sustain it's workforce in the future?
Response: Comment acknowledged.	
Minor, Stephen	Thank you for reading my letter. I would like to keep this world beautiful and clean. You can help me fulfill my dream and also help keep this world clean and perfect.
Response: Comment acknowledged.	
Mireault, Kathleen	NO! NO! NO! Our country is not a thoroughfare for crude oil. Thank you!
Response: Comment acknowledged.	
Mitchel, John	The US should be working towards energy self-sufficiency and creation of energy from clean, renewable resources. Exporting oil and coal does not benefit anyone in the US except for the companies selling the oil and coal.
Response: Comment acknowledged.	
Mitchell, Aaron	As an avid fisherman and naturalist of our local waterways and wetlands, this topic is of serious importance. It's not a question of if but when there is an accident and we face a devastating ecological disaster.
Response: Comment acknowledged.	
Mitchell, Echo	We won on the Keystone, but now the impositions on our rights cntinue. When can the people actually have the say over the oil company corporate executives?
Response: Comment acknowledged.	
Mitchell, Tamara	I participated in a raft trip on the Rogue River where the proposed pipeline will go. It's devastating to see it. A 100 ft. wide swath of clearcut will be made the entire length of the pipeline right through beautiful forests, private lands, pristine wi

Commenter Name	Comment
Response: Comment incomplete.	
Mitchell, Yolanda	Please save our coasts and lands from potential disasters and environmental pollution from expansion of oil transports. Thank you for reading my letter.
Response: Comment acknowledged.	
Miyashiro, Stephanie	Crude oil transport threatens major pollution to our precious planet. Met a woman from mid country demonstrating at Sacramento State Capitol who moved west to California after finding she could set her faucet water on fire with a match! Not drinkable! Then finding out that we were being threatened with fracking contamination also. Please. Keep our water drinkable. Do NOT allow our aquifers to be poisoned!
Response: Comment acknowledged.	
Mobley, Mary	Stop this NOW!
Response: Comment acknowledged.	
Moehring, Pamela	I so want future generations to recognize the beauty of the USA - and to be proud to be citizens. Both hopes are threatened by oil shipping.
Response: Comment acknowledged.	
Moelter-gray, Chrysteen	We all need to stand up for our precious earth home, instead of punching holes in her crust, transporting and burning fossil fuels that do nothing to improve the environment. Let's stop that madness and begin constructing infrastructure to support the use of cleaner, renewable energy sources.
Response: Comment acknowledged.	
Moen, Lynn	Thank you for reading my letter. I just want to add that I appreciate all of the work Earthjustice does for the environmental problems that are faced. I hope you do your part in protecting Grays Habor for all of us. Thanks. Lynn
Response: Comment acknowledged.	
Moersdorf, Rn, Lisa	Accidents DO HAPPEN. Let's prevent increasing dangerous crude oil traffic. Please stop the expansion now!
Response: Comment acknowledged.	
Moffat, Jack	Washington state doesn't need to be exposed to these dangers. Why do we allow the greed of others to overwhelm our communities?
Response: Comment acknowledged.	
Moffat, James	Enough trains!! Enough oil!
Response: Comment acknowledged.	
Mohr, Anne	If they can't have a pipe they will want rail or other means to transport their dirty gold. Enough. Oil industry
Response: Comment acknowledged.	
Moliere, Carmen	Against oil transport is enough damage to our country
Response: Comment acknowledged.	
Monaco, Livia	Anough with oil spills and carbon pollution....We are killing our planet
Response: Comment acknowledged.	
Money, Christine M.c.	One quick look at the oil industry's appalling record of accidents and subsequent spills should determine oil transportation should be phased out, not expanded, and renewable energy industries encouraged.
Response: Comment acknowledged.	
Monin, Bertha	We the citizens of the USA do not wish for oil to be transported across our nation. There is too much risk to us with all the accidents and oil spills. We want it halted before the storage places are built.
Response: Comment acknowledged.	
Monkemeyer, Lenora	We must go full ahead with developing renewables- wind ad solar power and reject the fossil fuels if we are to prevent global warming.

Commenter Name	Comment
Response: Comment acknowledged.	
Monroe, James R	KEEP IT IN THE GROUND - Thank you for reading my letter.
Response: Comment acknowledged.	
Monte, Bonnie	FRACKING IS SUICIDE! STOP IT NOW AND BAN IT FOREVER!
Response: Comment acknowledged.	
Montes, Carlos	Please think thrice when proposing this type of projects that make our lives more stressful because of the risks to our health and environment. Our future and our children's future depends on what we build today. Why don't we build something constructive and ecologically satisfying instead? Thank you for reading my letter.
Response: Comment acknowledged.	
Montgomery, Rick	AND YOU PROBABLY DON'T EVEN CARE , THAT ALMOST ALL RAIL TRAFFIC FROM THE WEST TOWARDS EAST, GOES UP RIVER ALONG THE COLUMBIA RIVER GORGE!! THERE ARE TRACKS ON BOTH SIDES OF THE RIVER!! THERE HAS BEEN LOTS OF TRAIN WRECKS ON BOTH SIDES!! AND SOME OF THE WO
Response: Comment incomplete.	
Montgomery, Susan	Invest in renewal clean energy and stop the dependence of oil.
Response: Comment acknowledged.	
Montoya, Corrine	No! We need to work on using alternative energy for our needs instead of creating more problems by developing more fossil fuel terminals! No more terminals, no more transports of fossil fuel!
Response: Comment acknowledged.	
Moody, Becky	We need to look to the future. Limit oil transport across our State. Invest in other forms of energy. Beef up the Solar and wind programs. Make it more affordable for the average citizen.
Response: Comment acknowledged.	
Moody, Harold	I live in a community with rail lines passing through it and have noticed a great increase in the number of oil trains. This is in a densely populated area. There was never a problem getting oil into L.A. before the trains, whatever happened needs to be fixed. There must be another way to move the oil without endangering large numbers of people with unsafe rail cars that have already demonstrated their potential for problems in Canada and in our Mid-west.
Response: Comment acknowledged.	
Moody, Janeane And Ian	We implore you to stop the construction of any more oil export terminals on the U.S. west coast. Please protect our country from oil spills, toxic and dangerous rail catastrophies, and the world from any more carbon pollution.
Response: Comment acknowledged.	
Moody, Rebecca	please stop destroying our earth. No more oil please!!!!!
Response: Comment acknowledged.	
Moody, Stanley And Michelle	We love to vacation in Washington and would be sad to have what we love ruined with an oil spill. Our oceans are already at risk, why add more to that risk. Rail transport is great but not for more oil that can do great harm.
Response: Comment acknowledged.	
Moody, Yvonne	The possible damage is scary!
Response: Comment acknowledged.	
Moon, Twila	Stop terminal construction - for human health, safety, and the environment. Thank you.
Response: Comment acknowledged.	
Moore, Kelly	It's getting to be too late. Please let's try to heal and be at peace.
Response: Comment acknowledged.	

Commenter Name	Comment
Moore, Larisa	The health and safety of our residents and our natural environment (the reason so many people live here) is far more important than any short-term economic gain from oil transport. Please take the long view and protect our future!
Response: Comment acknowledged.	
Moore, Nic	Thank you for reading my letter. I am urging you to consider the external costs that the practice of shipping crude oils can cause, not only in regards to money (spill clean-ups, increased health care costs caused by exposure to neuro-toxins and carcinogens, loss of land and home value in case of a spill, loss of infrastructure and business activities when people leave a spill site, lawsuits against municipalities, state and federal entities after an explosion, spill or other such foreseeable disaster, etc.) but also the cost on society (loss of political good-will of constituents, increased stress in communities having to live with increased risk of exposure, accidents and disasters which leads to decreased productivity, quality of life issues, lower attraction of qualified personnel to business in the pipeline's shadow, etc.). These costs add up exponentially after just one 'accident', spill or disaster. Are they really worth the short-time financial gain promised by the pipeline's operators?
Response: Comment acknowledged.	
Moore, Sherrie	STOP the expansion of oil transport in environmentally sensitive areas, with basically no regulation. We don't NEED more oil in this country, we need to be developing alternatives such as BIRD SAFE wind and solar.
Response: Comment acknowledged.	
Moore, Vivian	I've spent 54 years visiting at the ocean and I say No Way. We need to start protecting our environment, not taking chances with short sightedness about our children's and grandchildren ability to enjoy it
Response: Comment acknowledged.	
Moorhead, Ruth	Please just stop pulling petroleum out of the planet. Then you won't have to ship it anywhere, and we can get on with the business of clean heating, cooling, cooking and lighting.
Response: Comment acknowledged.	
Moose, Wendy	This situation won't be necessary if we stop using fossil fuel!
Response: Comment acknowledged.	
Moran, Tamarah	Grays Harbor is a large sanctuary for migrating birds and other animals. Please don't risk this precious environment.
Response: Comment acknowledged.	
Moreau, Justin	Until we're all about wind and solar, we must use oil but I don't want a parade of oil tankers running across my state.
Response: Comment acknowledged.	
Morgan, Alecia	Thank you for reading my letter. PLEASE there are so many better ways to power vehicles and make the many items made using oil, like plastic - we MUST not continue to add to the destruction of livable earth to maintain and grow the coffers of a few people and major corporations.
Response: Comment acknowledged.	
Morgan, Bill	Number one we do not need oil terminals in areas of endangered species. Number 2 we do not need oil terminals that will allow us to export Athabasca Tar Sands Oil anywhere, since its the dirtiest oil on the planet..I've bee there and it's an environmental disaster..Take a trip and see for yourself. Thank you for reading my letter.
Response: Comment acknowledged.	
Morgan, Mike	The people who live there are against it. Do they count less than the oil companies?
Response: Comment acknowledged.	
Morris, Charlotte	We have too much pollution already. lets not increase it.
Response: Comment acknowledged.	
Morris, Chrys	It's time to get our heads out of our backsides and get our priorities straight. We need to concentrate on renewable energy and give up our addiction to fossil fuels.

Commenter Name	Comment
Response: Comment acknowledged.	
Morris, Jaklynn	Thank you for reading my letter. I strongly believe in preserving the earth for future generations.
Response: Comment acknowledged.	
Morrison, Cynthia	Unless a 100% guarantee of complete safety can be given, Oregon will not stand for inevitability of catastrophe. Please keep us off your "grid".
Response: Comment acknowledged.	
Morrisson, Susan	Oil transport is dangerous for our citizens. Your job, as representatives of the people is to protect and keep safe those in your care!!
Response: Comment acknowledged.	
Morrow, Dale	What part of self-destruction do you not understand?
Response: Comment acknowledged.	
Morse, Alan	Leave it in the ground!
Response: Comment acknowledged.	
Morse, Sam	Leave oil in the ground! Spend our tax dollars on rebuilding the infrastructure and developing sustainable energy sources!
Response: Comment acknowledged.	
Moser, Rich	No oil trains, go solar now!
Response: Comment acknowledged.	
Moses, Robert	Thank you for reading my letter. Finance Capital or the ability to pay people to do evil and inhumane actions is the root of all our problems
Response: Comment acknowledged.	
Mosher, Moya	I lived in Washington and my daughter was born there. I love the beauty and want to see it preserved for my grandchildren.
Response: Comment acknowledged.	
Mosher, Susan	Oil is our fuel that is encouraging us to be the future fossils. Our ignorance of the continual environmental degradation from the drilling, transport and usage of fossil fuels is our ticking time bomb.
Response: Comment acknowledged.	
Mosimann, Edward	Keep it clean. No more dirty money driving dirty fuel. Feebate large vehicles and inefficient homes. Grow up not backwards.
Response: Comment acknowledged.	
Motisher, George	I am disgusted that the expansion of dangerous and ecologically unfriendly oil transport should even be considered. I do not like to fight, but I will readily stand against this destructive endeavor.
Response: Comment acknowledged.	
Mott, Barbara	If you support this, may the biggest spill be in your backyard.
Response: Comment acknowledged.	
Mott, Kathy	Hasn't the oil industry destroyed enough of the planet with their spills and toxic chemicals used to get oil? Why are they trying to destroy the planet beyond saving? Why is money more important than the welfare of the earth and it's inhabitants?
Response: Comment acknowledged.	
Motteler, Catherine	No oil shipping terminals on the coast of Washington! No oil trains, oil tankers and oil barges. Please put human health above corporate oil profits!
Response: Comment acknowledged.	
Mountford, Mark	Please reconsider relocation of the 2 terminals to a different location to protect the environment of the Grays Harbor area.
Response: Comment acknowledged.	

Commenter Name	Comment
Mouton, Alexander	Please stop the two terminals proposed for Grays Harbor, Washington, and protect your community from increased crude oil rail traffic, oil spills and carbon pollution.
Response: Comment acknowledged.	
Mozanoski, Teri	Reduce our dependence and promote wind and solar energy. Long term this is the most logical and cost effective means to sustain life. Thank you
Response: Comment acknowledged.	
Mt.pleasant, Elizabeth	Thank you for reading my letter. I am speaking up for the treasures we would endanger for the profit of a few.
Response: Comment acknowledged.	
Mucci, Joseph	Rejection of Keystone XL was a huge step in the right direction. Now, for the same sort of reasons, please continue the process of moving to a cleaner future by rejecting the terminals.
Response: Comment acknowledged.	
Mueller, Bruce	It's long past time to stop increasing the world's dependence on oil and other fossil fuels. Creating new oil shipping terminals is going the wrong way. Please stop this now. Thank you.
Response: Comment acknowledged.	
Mueller, Debbie	Let Americans think from a different box. How about investing funds in promoting high-speed rail transit instead? Thanks for your consideration!
Response: Comment acknowledged.	
Muller, Catherine	The corporate world and the Navy seems determined to destroy the Olympic Peninsula paradise and World Heritage Center!!! Stop this disaster!!!! Allowing these things to happen is permanent stupidity!!!
Response: Comment acknowledged.	
Muller, Gale	stop the expansion of oil transport
Response: Comment acknowledged.	
Muller, Kris	This is also a local issue for us, as an export depot is proposed for Alameda. We are very concerned about transporting explosive, dangerous fuels in inadequate tanker cars in urban areas.
Response: Comment acknowledged.	
Mulligan, Kate	STOP
Response: Comment acknowledged.	
Mullin, Deirdre	Please, no more fires, death and destruction from oil trains. We have to stop destroying our planet for our sake and the sake of future generations.
Response: Comment acknowledged.	
Mullin, Martha	It is time to work on cleaner, safer means for energy usage. It is time to think about the future needs of the generations who will follow us, not just our immediate needs. Much of this involves making changes toward non-fossil fuel resources.
Response: Comment acknowledged.	
Mullins, Susan	Unless you are willing and fully able to pay for the REAL cost of your dangerous business on the environment, don't inflict your bad practices on Americans!
Response: Comment acknowledged.	
Mulshine, Peter	The trains have to run slower & be double lined . None should be exported /We need to stop any imports & develop clean fuel.
Response: Comment acknowledged.	
Mulvany, Nancy	I can't imagine two terminals in Grays Harbor. Thank you for reading my letter.
Response: Comment acknowledged.	
Mummery, Donna	Trains containing oil shipments are dangerous to the communities they pass through as the Canadians know from a train accident they experienced last year.
Response: Comment acknowledged.	

Commenter Name	Comment
Munday, Sherrie	this needs to stop NOW!! WE the people have spoken...
Response: Comment acknowledged.	
Mundy, Jaye Anna	Thank you for reading my letter. And more importantly for taking action to keep people and the earth healthy.
Response: Comment acknowledged.	
Muniz, Amber	Please stop killing our Earth! I want my child to live in a world that is still as beautiful as it is today!
Response: Comment acknowledged.	
Munro, Alan	Stop oil transport via WA! armunro, Alaska
Response: Comment acknowledged.	
Munson, Kenneth	Industrial Age thinking that perpetuates Industrial Age solutions. Evolve! Is this the best we/you can do? We sent a rover craft to Mars, and were still burning fossil fuels here on Earth. There is a reason we don't ride horses to work. Please think about the future TODAY and invest in tomorrow by knowing that by doing the same thing, over and over, you'll have the same results, burning fossil fuels and increased global warming. Thank you for reading my letter.
Response: Comment acknowledged.	
Murphy, Cathern	The Oil and Gas industry is literally destroying the ecosystems of this Earth. From Tar Sand extraction to drilling in the wilderness. These ecosystems are so damaged that it will take many life times to even begin to recover, but they will never recover
Response: Comment acknowledged.	
Murphy, Deborah	As Pope Francis indicted, we must be responsible for the environment.
Response: Comment acknowledged.	
Murphy, Miriam	Thank you President Obama!!!!!
Response: Comment acknowledged.	
Murray, Jean C	Please don't risk our environment w/ dirty energy- go green!
Response: Comment acknowledged.	
Murray-dailey, Marycolette	I want to preserve our environment: land, sea and air. That is a moral obligation to our future generations. Continuing to accommodate the oil industry is immoral and irresponsible!
Response: Comment acknowledged.	
Musgrove, Jeanne	Thank you for reading my letter. I am deeply concerned about our addiction to fossil fuels. It should be clear that they are not and should not be part of the future. And yet we continue to desperately cling to any profit we can make in the short run f
Response: Comment incomplete.	
Musser, Marsha	Too much risk, too little reward. There are far better ways to meet our energy needs, safer and wiser. Solar and wind are the wave of the future....hop on board the clean and renewable train!!
Response: Comment acknowledged.	
Myers, Holly	Please stop the proposed terminals. Our waterways are worth saving and they can not withstand a major oil spill. The trains and the shipping into our area is a real threat to our way of life.
Response: Comment acknowledged.	
Mylet, Margaret	No dangerous oil traveling through my area please.
Response: Comment acknowledged.	
Myrick, Mike	Allowing the proposed oil shipping terminals will not only create potentially disastrous environmental damage to property and human life, it could damage fish and wildlife. These unwanted results could occur not only at the terminals but, could happen at any point along the transportation route. This route include the vital fish habitat along the Columbia River and runs mere yards from homes and industries along the tracks. There have already been cases of disastrous fires and explosions along similar routes. The terminal and rail executives claim their rail cars are

Commenter Name	Comment
	safe to carry this volatile cargo, when in fact, most of these cars are old, single wall units, which have been proven to be unsafe. Please take into consideration the common sense action of denying the money first and damn the consequences of this application. Mike audu
Response: The Columbia River is outside of the proposed action's defined study area for animals (See DEIS Section 3.5 *Animals*). These areas and associated resources are within the extended study area that covers rail transport beyond the study area (see DEIS Chapter 5 *Extended Rail and Vessel Transport*); potential impacts to animals are covered in the extended study area. *Master Response 8: Geographic Scope of the EIS* further elaborates on the establishment of the study area and extended study area in the DEIS, and explains the SEPA regulation requirements that determine whether or not an impact needs to be addressed in the DEIS.	
Nace, Bob	op mthe sludge...
Response: Comment incomplete.	
Nacheff, Marni	Big Oil just needs to stop destroying the planet and putting us at risk. We can do better and they need to divest their interest into solar and wind.
Response: Comment acknowledged.	
Nadel, Barbara	Thank you for reading my letter. It is time to stop using fossil fuels to get our energy. Building more infrastructure for oil and gas is not the way forward. Wind and solar are our future and they must be promoted over anything else. Our futures and that of the planet are at stake.
Response: Comment acknowledged.	
Nadelman, Fred	Oil can be dangerous when moved. Reduce this need.
Response: Comment acknowledged.	
Nagel, Dayle	We want our earth to be liveable for our grandchildren, don't transport their oil in our state!
Response: Comment acknowledged.	
Nagel, Karen	Thank you for reading my letter. I have no problems with out neighbor, Canada. But if they need to transport oil, they can pipe or move it through their own territory. We don't need to face all the dangers of spills and water pollution.
Response: Comment acknowledged.	
Naimark, Mona	Stop the proposed shipping terminals for Grays Habor immediately. Thank you.
Response: Comment acknowledged.	
Nakamura, Cecilia	There have been too many accidents!
Response: Comment acknowledged.	
Nap, A	NOW that XL was rejected by the people we have to stop the use of fossil fuels and replace it with renewable energy. Thank you for reading my letter.
Response: Comment acknowledged.	
Naples, Jean	Thank you for reading my letter and standing up to the oil industry to slow the dangerous expansion of oil transport by export terminals on Washington's coast.
Response: Comment acknowledged.	
Narbutovskih, Anna	Our goal, as a nation, needs to be one of healing the environment, not making the damage and pollution worse.
Response: Comment acknowledged.	
Nash, Margo	Our country needs more clean energy and less fossil fuel. The Exon Valdez and the Gulf are reminders that we are not as a nation prepared to handle large disasters of that magnitude. Catastrophes that transport and drilling of crude put to risk other livelihoods. Yes, I live in Alaska a state dependent on oil and gas and yes, I get a PFD. But it's time for a change.
Response: Comment acknowledged.	
Naughton, Jodie-kay	Please don't expose our country to more opportunities for environmental disaster.
Response: Comment acknowledged.	
Nazor, Craig	Stop! Enough global warming. Enough pollution! Enough of crooked big oil! ENOUGH!

Commenter Name	Comment
Response: Comment acknowledged.	
Neal, Tracy	We need to start cutting back on our use of fossil fuels, not expand the infrastructure to support their use. Thank you for reading my letter.
Response: Comment acknowledged.	
Needham, Gail	this is not the future we want.
Response: Comment acknowledged.	
Nekola, Barbara	The USA needs to generate more electricity from the sun and wind NOT oil!
Response: Comment acknowledged.	
Nelson, Carol	Thank you for all you do to protect the environment in the Northwest. Increasing the transport of oil via rail increases the chances for devasting spills. I also believe that climate change related to the increased burning of fossil fuels is the one of the biggest challenges we face. It will continue to have horrible consequences for those who can least afford it. Thanks for your attention.
Response: Comment acknowledged.	
Nelson, John	I live in the Columbia River Gorge. I live one block from the railroad tracks that goes through my town. Every time I hear news of a train derailment involving unit oil trains and a massive explosion I become more fearful of how a similar event could happ
Response: Comment acknowledged.	
Nelson, Kristine	We are so behind other nations - we have got to get going on renewables and get rid of fossil fuels. Our children and grandchildren depend on your actions TODAY!
Response: Comment acknowledged.	
Nelson, Tom	Please see the light & invest in renewables. So what if it costs you more, just pass the cost to the consumer like you always do.
Response: Comment acknowledged.	
Nerger, Robert	Go Solar!
Response: Comment acknowledged.	
Ness, Gina	These are disasters waiting to happen... The oil companies need to understand that they are moving to the "past"... Protect our Marine life and our citizens... Thank you...
Response: Comment acknowledged.	
Nestel, Gilbert	Do the right thing-Stop the oil line now!
Response: Comment acknowledged.	
Neubauer, Karen	More Clean Energy!NO more crude!
Response: Comment acknowledged.	
Neufeld, Cynthia	It is time to account NESARA and all the sequestered technologies as we do NOT need fossil fuels for energy.
Response: Comment acknowledged.	
Neuhasuer, Elinor	Please follow President Obama's example. The time IS now to take courageous action to address climate change! Protecting Grays Harbor is a step on the long journey ahead!
Response: Comment acknowledged.	
Neumann, David	I am opposed to having these oil trains pass through Idaho. I've seen what has happened in other states and it would devastating to our environment, economy and way of life to have such a disaster here in Northern Idaho's beautiful lake country.
Response: Comment acknowledged.	
New, Bonnie	I oppose the building of the two terminals at Grays Harbor because of the significant risk of oil spills, community disruption and contamination from transport, and the increase in carbon pollution which will profit a few at the peril of all. The possibl
Response: Comment acknowledged.	

Commenter Name	Comment
Newcomb, Jean	This is not a future. Renewable energy is the only way forward.
Response: Comment acknowledged.	
Newcomb, Tim	The following FACTS speak to the need to prevent building export terminals for fossil fuels: 1. There have been numerous oil train accidents over the past few years. Oil trains carrying Baaken oil are especially dangerous because the high flammability of the product, and because BEZENE is present to the extent of 1 % or slightly more. The EPA acceptable limit for benzene in water is one PPM. 2. The wreck near Yellowstone Park resulted in benzene pollution for miles down river. 3. Parts of the rail routes to the coast have only one track. 4. The WORLD faces the immediate need to keep as much fossil fuel in the ground due to the increasing effects of climate change, which include rapidly rising temperatures, increasing forest fires, failing water supplies and of course rising amounts of CO2 in the atmosphere. What are you leaving for your children. Please think about it! Tim Newcomb, M. A. ,Accredited Greenhouse Gas Analyst, California
Response: Comment acknowledged.	
Newkirk, Dorothy	Why are we shipping oil out of our country? Wouldn't keeping it in the USA make us more energy independent?
Response: Comment acknowledged.	
Newman, David	Oil has never paid the full cost to health and to the environment of fossil fuel production, distribution and use. If it were required to do so it would quickly invest in renewable resources instead. It way past time to make corporate oil pay its way -- easing the way for oil is a huge subsidy from the American public that has been going on for far too long. This must end now.
Response: Comment acknowledged.	
Nicholes, Linda	Oil transport has already caused way too much death and destruction. The deadly expansion of oil transport must be stopped before even more carnage results. Let's move to save, renewable energy instead to power our transportation and our lives.
Response: Comment acknowledged.	
Nichols, Billy	Our rail system is not ready for the added capacity these trains will bring - our emergency responder's are not prepared for the inevitable disaster that will ensue and at the end of the day we just don't need the dirty oil that the trains carry. This is
Response: Comment incomplete. Refer to Section 4.5 *Environmental Health Risks—Rail Transport* of the Draft EIS for a description of the potential risks that could result from the proposed action.	
Nichols, Carmen	It is important that we discontinue the use of crude oil. It is destroying the world in which we live. It has come out the ExxonMobile knew for many years the destruction oil would create in our world. Now it is time to leave fossil fuels where they lay (in the ground) and move forward with cleaner resources. Stop transporting this dangerous and killing toxin through out our state and move forward with clean energy. Thank you for reading my letter.
Response: Comment acknowledged.	
Nichols, Paul	Thank you for reading my letter. Please support clean and green energy, and end our foolish reliance on fossil fuels.
Response: Comment acknowledged.	
Nicholson, Carol	Focus on renewable energy sources!
Response: Comment acknowledged.	
Nicholson, Katharine	This is so urgent!
Response: Comment acknowledged.	
Nicholson, Reed	I do not want oil terminals at Grays Harbor. We need to be moving toward clean energy and not putting our citizens in danger.
Response: Comment acknowledged.	
Nickell, Marie	Please close your port to dirty energy companies.
Response: Comment acknowledged.	

Commenter Name	Comment
Nickolds, Jonah	We have run out of time, and now we need to demand responsibility of the uber rich, who just want to keep getting richer and are blind to their destruction.
Response: Comment acknowledged.	
Nickum, J	Non-renewable natural resources, resources that exist in limited quantities should never be exported. The dangers associated with transportation of crude oil, only increases the need to stop this foolish and dangerous practice. Thank ycu for reading my letter.
Response: Comment acknowledged.	
Nieland, Thomas	Stop the insanity!
Response: Comment acknowledged.	
Nielsen, Frankie	We only have one earth, we must do all we can to protect our environment.
Response: Comment acknowledged.	
Nielsen, Margo	I live on the Texas gulf coast and think that it should be protected, not endangered. Thank you for reading my letter.
Response: Comment acknowledged.	
Nielsen, Melanie	There are many different sources of energy, it's time for us to evolve!
Response: Comment acknowledged.	
Nierman, G.L.	I oppose transport of volatile oil and oil products through communities in general.
Response: Comment acknowledged.	
Niermann, Betty	Please stop the expansion of operations at Grays Harbor. It's time to think cleaner energy.
Response: Comment acknowledged.	
Niggle, Kaylynn	Thank you for reading my letter. The last thing the U.S. needs is another major oil spill somewhere. Remember, New Orleans, and the recent Calif. coastal debacle. You are just upping the ante in another direction.
Response: Comment acknowledged.	
Nimmons, Rebecca	Protecting the environment protects people.
Response: Comment acknowledged.	
Nine, Wendy	A lot of people don't want stuff like this "in their back yard," but I don't want polluting, dangerous transports of any kind anywhere!
Response: Comment acknowledged.	
Noble, Katherine	Thank you for reading my letter. The Washington Coast and Puget Sound is a beautiful and important part of the environment. Don't let oil destroy it. Until our methods of shipping oil can be made 100% safe from spills we are always at risk of catastrophic
Response: Comment incomplete.	
Noblett, Dee	Maybe if one of these trains derails in your back yard you would have a different take on this??? Why should we have to worry about something like this when it shouldn't be done in the first place??????? We NEED renewable energy!
Response: Comment acknowledged.	
Nochimson, Martha	DON'T LET BIG OIL KILL OUR COUNTRY.
Response: Comment acknowledged.	
Noden, Gail	I am against any transferring any crude oil through the US. Better ways exist to address our energy needs.
Response: Comment acknowledged.	

Commenter Name	Comment
Nolting, Sharon	Oil spills are inevitable and very damaging. We don't need to expand our use of fossil fuels, but rather to phase down and ramp up renewables.
Response: Comment acknowledged.	
Norden, Chris	Having studies the social, economic, public health and safety, and environmental effects of large-scale transportaion of petroleum fuels, this Idaho family strongly opposes the trans-shipment of crude oil trains across our state. Likewise, as frequent vi
Response: Comment incomplete.	
Nordquist, Debra	Please protect our country from increased crude oil rail traffic. We do not need the increased risk of oil spills and more carbon pollution. Thank you for reading my letter.
Response: Comment acknowledged.	
Norkus, Edward	What possible rational justification can there be for putting the lives and health of American citizens at risk?
Response: Comment acknowledged.	
Norlander, Peter	My Name is Peter Norlander and I believe I safegaurding all our habitat for all our children.! Thank you for reading my letter.
Response: Comment acknowledged.	
Norman, Britt	Please stop the dangerous expansion of oil in north Carolina.
Response: Comment acknowledged.	
Norris, Kathy	Big oil can not be allowed to take over! They are the biggest moneymaker in the U.S. Already and putting in pipelines all over Texas!
Response: Comment acknowledged.	
North, Calvan	Thank you for reading my letter. We have seen the result of oil export through sensitive coastlines. Has the damage from deep horizon or even the EXXON Valdez been repaired yet? We need to move away from oil use and a good start would be to use what we
Response: Comment acknowledged.	
Novak, George	Before these buffoons build any more "terminals they better consider how they are going transport the oil on the rail system their obstructionist lackeys in Congress have failed to fund for maintenance. If the tracks won't support the traffic (they won't) new terminals become moot. Fix what ya got before screwing up the environment any more than you already have.
Response: Comment acknowledged.	
Novak, James	We shouldn't sacrifice our environment to assist foreign economies. We have to decrease our need to burn oil.
Response: Comment acknowledged.	
Novak, Justin	Please rejdct this proposal and INCREASE the pressure to fund more clean energy. Our planet desperately needs a new approach!
Response: Comment acknowledged.	
Novick, Christine	I am more than willing to sign this petition in order to keep oil away from my home state. We don't need it anywhere.
Response: Comment acknowledged.	
Nowack, Laura	I think we need to set up refineries where the oil is and not run the very real risk of polluting our environment from a spill. No transport of oil across our great nation!
Response: Comment acknowledged.	
Nuckels, Robert	We should be doing everything to cut our consumption or oil. To minimize global warming fossil fuels must be kept in the ground and renewable energy promoted. These facilities are dangerous, unneeded (except for increasing the profits of multi-nationals
Response: Comment incomplete.	
Nuessle, Charlotte	The Pacific Northwest is a rich treasure of natural resources. It is a great responsibility to steward them. Washington, our neighbor to the north, faces serious threats from these proposed shipping terminals. We all need to find alternative ways to move forward, not destroy our very land, our sea,

Commenter Name	Comment
	all that is beautiful about where we live. Stand strong against these short sighted for-profit motives that do not represent a greater good.
Response: Comment acknowledged.	
Nugaris, Anna	Please respect the people, marine animals and environment. Please stop the proposed two terminals. Thank you, Anna Nugaris
Response: Comment acknowledged.	
Nunes, Sharmaine	As a resident of Oakland, CA, I am aware of the terrible decision that my elected city officials have made to allow the transportation of coal into my area. Please don't make the same poor choice! Please.
Response: Comment acknowledged.	
Nunez, Rudy	Oil spills damage the environment, destroy wildlife and domestic, and it takes decades for things to return to normal, if they actually ever do. Haven't we seen enough of this?
Response: Comment acknowledged.	
Nutting, Eric	Please don't bring this risk to the area.
Response: Comment acknowledged.	
Oberfield, Keren/richard	The transport of oil across our country is dangerous in many ways . We need to protect the communities that are risk .Our environment and people are too precious . .
Response: Comment acknowledged.	
O'Brein, Lee	It is now time to transition to renewable clean energy.
Response: Comment acknowledged.	
O'Brien, Kathy	Why let these Oil Baron's turn Our Planet into a Wasteland for Greed and Profit? Stand up for our Planet!
Response: Comment acknowledged.	
O'Brien, Kathy	The Oil Barons are Turning Our Planet into a Wasteland all for Greed and Profit. Do their Grandchildren know what they are Doing and do these Barons even Care? This is Unacceptable!
Response: Comment acknowledged.	
O'Brien, Kris	The 2 terminals proposed for Grays Harbor, Washington, should never happen there or anywhere else. What an abomination.
Response: Comment acknowledged.	
O'Brien, Sara	We have every right to protect our communities from these disasters.
Response: Comment acknowledged.	
O'Brien, Sherri	Think through this. Think on beyond profit!
Response: Comment acknowledged.	
Ochis, Adrienne	It's shocking what a love for money by "Big Oil" will make them try to do to our country. A Native American saying is that the country isn't ours...we are borrowing it from our children and grandchildren.....what kind of a country will big oil leave for those coming after us?
Response: Comment acknowledged.	
Ochoa, Giancarlo	Thank you for reading my letter. Please stop destroying our planet !!! We only got one earth so stop with the greed and start caring!!
Response: Comment acknowledged.	
O'connor, Claire	The te for lies is over. You are creating a planet that can no longer sustain life.
Response: Comment acknowledged.	
O'Connor, Margaret	How many more lives will be lost and how many more personal injuries which take away quality of life, how much devastation of the natural environment, before we finally come to our senses and stop this quest for oil? We need to CHOOSE LIFE.
Response: Comment acknowledged.	

Commenter Name	Comment
O'Connor, P. A.	Please think about the hideous damage these fires and oil "spills"do to people and th environment. You, too, could be injured, as we.. As loved ones. Please?!
Response: Comment acknowledged.	
O'Connor, Patricia	If this fails I hope some people who are smoking a cigarettes pours that oil on you all flicks the cigarettes on you and you burn. They you'll see why you shouldn't have done that.
Response: Comment acknowledged.	
O'Connor, Roy	I live in Missoula, Mt, and have daily coal trains, transport trains, and oil trains. We have had trains dump wood, boeing plane bodies, beer, chlorine, and other items in the Clark Fork River, near our town. We do not need any more, especially with volatile crude oil. We have spent many millions of dollars cleaning up our river of mine waste and toxic metals, we need to protect it. With increased traffic, it is only a matter of time before this oil ends up in our river and water. Say no to this expansion, and export of crude oil.
Response: Comment acknowledged.	
Odden, Steven	The great Petro Scam
Response: Comment acknowledged.	
O'Dell, Rebecca	This CANNOT be allowed to pass! This would be the WORST disaster to our country! I DEMAND this be put to an END now!!! :-(
Response: Comment acknowledged.	
Odion, Raven	Thank your for your consideration. Lets take charge of our children's and grandchildren's future now, leaving them a safe environment in which they can live. We need to put our dollars into clean energy, not the continuation of fossil fuels.
Response: Comment acknowledged.	
Ogden, John	This is environmentally stupid. If the oil companies want to drill for dirty oil, let them refine it at the same location..
Response: Comment acknowledged.	
Ohara, Michelle	Thank you for reading my letter. Please stop using fossil fuels! We have alternative choices now and forever not like draining the world of its natural resources and destroying the land and people. I was in the business in the 1980's and walked away when I realized it was wrong and greedy. Greedy, that's the key word! Stop now please.....
Response: Comment acknowledged.	
Ojala, Jessica	Let's invest in renewable energy instead.
Response: Comment acknowledged.	
O'Keefe, Dan	It's time to stand up to "Oilogarchy" and transfer to sustainables.
Response: Comment acknowledged.	
O'Keefe, Kerin	This is simply too dangerous, too polluting. STOP THESE PROJECTS BEFORE OIL SPILLS WRECK OUR COUNTRY, OUR OCEANS, AND BEFORE EXPLOSIONS KILL PEOPL!
Response: Comment acknowledged.	
Olasin, Karen	Carbon pollution
Response: Comment acknowledged.	
Olcsvary, Michael	Please don't miss this opportunity to be on the right side of history.
Response: Comment acknowledged.	
Olmstead, Katherine	With the state our climate is in already, we need to be focusing on getting renewable materials in play now, not expanding the problem letting these oil companies build their terminals. We need to get our priorities straight as a country, and our priority needs to be getting our greenhouse gas emissions back to a safe, livable level.
Response: Comment acknowledged.	
Olsen, Ambre	We can't afford the costs of these proposals. They needlessly put the health and well being of our communities and environment at risk. Do the right thing: reject these proposals

Commenter Name	Comment
Response: Comment acknowledged.	
Olson, Carl	Time to join the 21st century and abandon our continued use of fossil fuels...keep them in the ground where we found them. This is doable and will reenergize the world economy.
Response: Comment acknowledged.	
Olson, Carol	Thank you for reading my letter. Stop the implementation of the TPP and stop big oil.
Response: Comment acknowledged.	
Olson, David	Not only are the proposed terminals environmentally destructive but the production of the oil is destructive. This oil production poisons our ground water and destroys our wild environment. Say noto these proposed terminals.
Response: Comment acknowledged.	
Olson, Madeline	Please do not trade a live able environment for jobs.
Response: Comment acknowledged.	
Olson, Phillip	go green, save our water
Response: Comment acknowledged.	
Olson, R. Court	Ladies and Gentlemen. I am a private citizen with a strong moral conscience. I'm also a consulting engineer involved with commercial building design and construction. Furthermore, I've studied in great detail how energy is generated and consumed in buildings, transportation, industry and agriculture. I know how all of these sectors can dramatically reduce the consumption of fossil fuels and transition rapidly to sustainable and renewable fuels. The future of our nation, all nations, all peoples and all living things is in great peril if we don't make this transition promptly. I therefore fully support the Earth Justice detailed letter that I am hereby adding my name to. I also know that there are increasingly better jobs and opportunities in clean energy projects. That is where the best interests of our children and grandchildren are to be found. Please be smart about our collective future. Do not allow the expansion of fossil fuel export facilities on our coast. Thank you for listening. --R. Court Olson
Response: Comment acknowledged.	
Oltarzewski, Diane	The science is clear - continuing to enable the fossil fuel industry is NOT in our best interest, as a planet. Please protect Grays Harbor and its people from this dangerous intrusion.
Response: Comment acknowledged.	
Oman, J.W.	I support this message.
Response: Comment acknowledged.	
O'Meara, Patrick	the transport of oil, the use of oil and gas and the TPP that takes away the rights of our people and protects big oil will end in the eventual destruction of our world and the extermination of much of the life on this earth. Thank you for reading my letter.
Response: Comment acknowledged.	
O'Neal, Nancy	We've had more than enough oil disasters. Thank you for reading my letter.
Response: Comment acknowledged.	
O'Neil, Patricia	Clean energy--NOT fossil fuels!
Response: Comment acknowledged.	
O'Neill, Gwynn	Oil spills are inevitable as recent history has shown. The west coast does not belong to oil companies. It belongs to everyone living on it.
Response: Comment acknowledged.	
O'Neill, Randy	Please look to future. With money spent on two wars U.S. could have put solar panels on every building and grid would be secure unlike now with main power plants being vulnerable. Also, billions of dollars would not be supporting middle east economy. Our military presence would not be needed to protect multi-national corporate interests. Failure to not harness solar, wind, hydro, tidal, methane production and geothermal energies with a sensible energy policy is criminal. Fat cats sitting on their hands bought by corporate interests do not have our countries best interests at heart.

Commenter Name	Comment
Response: Comment acknowledged.	
Opfergelt, Robert	WIND & SOLAR IS THE FUTURE, OIL IS DEAD.
Response: Comment acknowledged.	
Oppenheim, Garrett	I don't want to see further oil development at all, but don't let big oil corporations destroy pristine Washington environment
Response: Comment acknowledged.	
Orechovesky, Billie	As I have always stated, this is not a dress rehearsal. This is the only world & environment we have now. We must protect it for us & our generations to come. Thank you.
Response: Comment acknowledged.	
O'Reilly, Lisa	Thank you for your time and consideration. I appreciate your stepping up to protect our environment, communities, and local economies.
Response: Comment acknowledged.	
Orgel, Linda	It's time to leave it in the ground and invest in renewable energy.
Response: Comment acknowledged.	
Orionis, Leo	Please leave the oil in the ground where it doesn't add to climate change, explosions, and spills. The U.S. needs to join the rest of the world in moving to solar and wind power.
Response: Comment acknowledged.	
Orleans, Margaret	First certain elements in our country try to ram through approval for unnecessary pipelines. Then they lift the embargo on the exportation of oil, because the U.S. doesn't really need this new dirty resource. The people I know who live along these proposed routes are not NIMBYs, but citizens concerned about the environment they will be passing down to their children and grandchildren. Let's look much further into the future than short-sighted industrialists and politicians are willing to do.
Response: Comment acknowledged.	
Orlinski, Patricia	Do not endanger people to ship oil.
Response: Comment acknowledged.	
Orme, Kevin	Just say NO. No to creating more climate change, no to fossil fuel exports to China, just NO!
Response: Comment acknowledged.	
Ornelas, Maria	Stop building your dirty, disgusting, dangerous oil shipping terminals. This is the land of our children's children's children's children's children's children's children.
Response: Comment acknowledged.	
O'Rourke, Susan	Thank you for reading my letter. We have witnessed far too many oil spills and our environment is worth more than your profit
Response: Comment acknowledged.	
Orphanoudakis, Ava	I am an environmental educator and painter. I know first hand how much the youth of today is counting on us to clean up our mess. They will continue our work if we give them a model to follow. Please do the right thing to support the Earth that gives everything to us for life.
Response: Comment acknowledged.	
Orr, Jenne	Quit allowing the pollution of our land to support the profit of oil companies! Our land and citizens are MORE IMPORTANT than profit and it has been shown over and over that this type of transport ALWAYS leads to spills and contamination at some point.
Response: Comment acknowledged.	
Orr, Michele	Too much creature life death, live water and poison into the earth already. Thank you for reading my letter.
Response: Comment acknowledged.	
Ortiz, Carol	We must take every opportunity now to reverse environmental damage from the utilization of fossil fuels. Protecting Grays Harbor is one of them.

Commenter Name	Comment
Response: Comment acknowledged.	
Orum, Shyama	We must move to renewables instead of shipping dangerous fossil fuels.
Response: Comment acknowledged.	
Osband, Kathryn	Now is the time to lead the way to a sustainable, renewable energy system.
Response: Comment acknowledged.	
Ostrov, Aerica	We do not need more oil. We have come so far with alternative fuels that do not damage our ecology. Let's focus our efforts on what is working, instead of dumping more money into crude. Thank you.
Response: Comment acknowledged.	
Ottmann, Margit	Do not put another area in danger of massive pollution. The future of the planet depends on it.
Response: Comment acknowledged.	
Ouellette, Joanne	Will we ever learn to be the caretakers of our beautiful world? I don't think so in my time.
Response: Comment acknowledged.	
Outka, Ann	The transportation of oil has proven to be insecure and therefore dangerous to the land, water and the animals (including humans) that are near the transport paths. Stop the oil companies from putting greed above safety. Do not allow the terminals.
Response: Comment acknowledged.	
Overholtzer, Pamela	Shell Oil just withdrew from Arctic drilling - not feasible. Canada (Alberta specifically) is becoming increasingly more uneasy about the environmental disasters occurring in the Athabasca, in general, and shale oil extraction, specifically. The world is
Response: Comment incomplete.	
Overstreet, Cherlindrea	The money used to build this system should go towards preservation and sustainablilty not aid in more destruction
Response: Comment acknowledged.	
Owen, Barbara	Thank you for reading my letter. This just one more reason we should be moving faster forward to clean renewable energy rather than backwards to dangerous and polluting energy. As to export - what will happen when some other countries get more serious about clean renewable energy than we are?
Response: Comment acknowledged.	
Owens, Katharine	Let's stop this now! We will never reduce our carbon footprint if we continue to use oil, rather than alternative energy. Let's preserve our beautiful country!
Response: Comment acknowledged.	
Owens, Sheila	Big oil has been the bane of our nations existence for years. We do not need oil shipping by rail or oil tankers. Oil spills are so hazardous and our country's environment needs protection. I say NO TO EXPAANSION OF OIL TRANSPORT.
Response: Comment acknowledged.	
Pace, Laurel	Thank you for reading my letter.Stop the insanity!!!
Response: Comment acknowledged.	
Paez, Maria	Please review and consider to support. Many thanks.
Response: Comment acknowledged.	
Page, Diana	No further oil infrastructure should be built.
Response: Comment acknowledged.	
Page, Robert	It is time to stop burning fossil fuels and invest in sustainable energy sources and systems. Please push the nation in the right direction toward a sustainable future. Thanks for reading my letter,
Response: Comment acknowledged.	

Commenter Name	Comment
Paglieri, James	The proposal for oil terminals at Grays Harbor should be rejected. The degradation to the environment from daily operations and from potential accidents is too great.
Response: Comment acknowledged.	
Pagliughi, Debra	We need to focus on expanding renewable resources rather than the oil industry.
Response: Comment acknowledged.	
Pala, Paul	THE TIME FOR SCREWING AROUND IS OVER. END THE FOSSIL FUEL MADNESS NOW! FOSSIL FUELS = DEATH!!
Response: Comment acknowledged.	
Palladino, Diane	I DON'T WANT TERMINALS TO BE BUILT. FOSSEL FUELS ARE NOT TO BE ENCOURAGED. WE NEED TO PROTECT WHAT LITTLE OF A CLEAN ENVIRONMENT IS LEFT TO US.
Response: Comment acknowledged.	
Palmer, Debra	Grays Harbor and the surrounding area are precious and irreplaceable to both the seafood industry and the tourist economy. Please do not allow these proposed oil terminals!
Response: Comment acknowledged.	
Palmer, Karen	Time for the globe to turn to renewable sources of energy. Fossil fuels need to kept in the ground.
Response: Comment acknowledged.	
Palmer, Richard	Thank you for reading my letter. Fossil fuels are the past and this project is part of the desperate effort of the vested interests in this past--and a particularly dangerous one at that.
Response: Comment acknowledged.	
Pameijer, Huguet	No expansion of transport of oil over our coastal waters or land is worth the risk of disasters and degradation.
Response:	
Panciera, Jeffrey	For industrial capitalism, our planet is merely a place of business. Our wild lands are industrial parks that have not been developed.
Response: Comment acknowledged.	
Pandey, Preeti	Yes!, We all need to stand up for the greater good of all living beings & the planet and all harmful practices need to be banned now before its' to late. Thank You.
Response: Comment acknowledged.	
Panter, Rich	Thank you for reading my letter, now SLOW THE EXPANSION OF OIL EXPORTS!
Response: Comment acknowledged.	
Pappas, Robin	Dangerous and all round bad news for the environment and us.
Response: Comment acknowledged.	
Pappas, Sandi	Thank you for reading my letter. This sounds very dangerous and needs to be stopped.
Response: Comment acknowledged.	
Pappas, Stephanie	Invest in CLEAN ENERGY! Do not risk Gray's Harbor!
Response: Comment acknowledged.	
Papworth, Carol	We do not want oil shipping terminals in Grays Harbor, WA!!!
Response: Comment acknowledged.	
Paradise, Diana	This expansion of oil transport would have terrible results on our environment and health hazards.
Response: Section 4.7 *Impacts on Resources* of the Draft EIS for describe the potential impacts on the human and natural environment that could result from the proposed action.	
Parker, Bonnie Lee	Oil is so damaging to the eco system, aka drinking water, and takes years and years to clean up. Please stop letter New York be a transportation route for the profits of others.
Response: Comment acknowledged.	

Commenter Name	Comment
Parker, Eric	Enough already. No new oil infrastructure.
Response: Comment acknowledged.	
Parker, Sharon	We should be moving away from oil and towards alternative energy. If we destroy Mother Earth there's no where else to go.
Response: Comment acknowledged.	
Parlier, Susan	This move to building shipping terminals in Washington could be the latest effort to circumvent the public's repeatedly stated concerns and the President's recent action to stop the Keystone XL pipeline from crossing the entirely of the United States to market dirty tar sands. If there is no easy, nearby port on *American* soil, then there will be less incentive to market this globally harmful tar sands.
Response: Comment acknowledged.	
Parsley, Adina	As a physician (retired), I must say that this is a public health disaster in the making. Don't do this.
Response: Comment acknowledged.	
Parsons, Judy	Thank you for reading my letter. I have a problem with the oil trains especially in philadelphia and living in the vicinity
Response: Comment acknowledged.	
Parsons, Karyn	Please don't let this incredibly hazardous actions continue. Thank you for reading my letter.
Response: Comment acknowledged.	
Parsons, Leslie	Thank you for the time to read my letter and seriously considering the dangerous consequences of expanded oil transport in this country.
Response: Comment acknowledged.	
Pascual, Pat	Thank you for reading my letter Unless they can .guaranty there will be no accidents and there will be monthly independent inspections to make sure things are being done properly and the rails and boats are all in top notch condition than they shouldn't be allowed to operate.
Response: Comment acknowledged.	
Pasholk, Robin	Too many trains move through the Neenah-Menasha area on poorly-maintained tracks through residential or mixed residential-commercial neighborhoods. Increasing such traffic anywhere is a disaster that won't wait as long as Big Oil would like it to before it happens!
Response: Comment acknowledged.	
Pasqua, John	END THE EXPANSION OF OIL TRANS PORT .
Response: Comment acknowledged.	
Pass, Paulette	We do not need more dirty crude oil transported across our country. Please do not allow this to happen. Thank you for reading my letter.
Response: Comment acknowledged.	
Passmore, Judith	Thank you for reading my letter. I hope I can trust that you'll act on behalf of the long-term good of our country and its' resources and override the get-rick quick schemes of non-renewable energy conglomerates.
Response: Comment acknowledged.	
Pastucha, Lori	Don't let Washington become another state to have suffered from oil disasters! There is no going back from a huge oil spill--just ask the people of Alaska about the long-term effects of the Exxon Valdez disaster, not to mention the people of Louisiana who have lost their livelihoods due to the BP oil platform disaster! Think about what kind of legacy you want to leave your grandchildren!
Response: Comment acknowledged.	
Patrick, Janice	Supporting crude oil traffic will never lessen our dependence on oil or oil products. We really need to stop this one 'in its tracks' so to speak. Dirty air, water and spills are the nightmares we can expect from allowing this to continue.
Response: Comment acknowledged.	

Commenter Name	Comment
Patterson, Alina	Thank you for reading my letter. I love the natural beauty of Washington State and lived and worked in many areas. Don't turn the NW into the ecocatastrophe of the East and Midwest. I worked on a superfund site that cost millions and millions for decades
Response: Comment acknowledged.	
Patterson, William	I think I'd better start to use public transit starting 11/9/2015 in order to not feel like such a hypocrite. we need to clean our country up. now!
Response: Comment acknowledged.	
Patton, Armand	Keep our environment clean and safe!
Response: Comment acknowledged.	
Patzke, Linda	I hope you will start to think in 'new,' life-giving ways -- most especially thinking LONG-TERM LIFE for planet and people.
Response: Comment acknowledged.	
Pauwels, Anita	America has the means and way to convert to clean energy. If the oil companies adopted a clean-earth policy instead of a scorched-earth policy, they could still make $$$ and contribute to the survival of all species and life on the planet. If they got behind Wind, Solar, Hydro, Algae Oil and natural gas, we could turn climate change around in 5 years, plus they would be receiving atta-boys and $$$ instead of lawsuits and roadblocks. It is time for the 'good ol boys' and the 'young turks' of industry to wake up and realize the '98%' want a clean future for our children and grandchildren. We are not against profit or business, but we are for a more conscientious use of our resources, and that means less coal, less oil, less fracking, and no nuclear. Thank you for reading my letter.
Response: Comment acknowledged.	
Pavletic, Terry	Thank you for reading my letter. I believe strongly we should all do what we can to preserve God's creation for future generations.
Response: Comment acknowledged.	
Paxton, Bobbie And Al	Thank you for reading my letter. We've had a couple of derailments in Iowa, and huge oil tankers run the rails all the time here. It's very scary.
Response: Comment acknowledged.	
Payne, Geneine	We must ensure that no further damage is subjected upon the environment.
Response: Comment acknowledged.	
Pecoraro, Steven	It's time for us as a country to move past fossil fuels once and for all.
Response: Comment acknowledged.	
Peer, Ruth	I don't live there, but I have been to the beautiful North West. It is precious. If you have the power to keep it safe and clean for all of us, please use it for that good. Thank you.
Response: Comment acknowledged.	
Pellett, Howard	I think that oil expansion in the Northwest will destroy our environment.
Response: Comment acknowledged.	
Penafiel, Carlos	Humanity will have to choose between disappearing as a thinking species that attempts against the planet or evolving towards a new era of integration with the rest of the universe.
Response: Comment acknowledged.	
Pence, Danika	I am devastated by all the ocean wildlife that is disappearing. Please reconsider.
Response: Comment acknowledged.	
Pennoyer, Ruth	Stop the two Grays Harbor terminals and all the New Jersey terminals. Thank you for reading my letter.
Response: Comment acknowledged.	
Pepin, Marion	Thank you for reading my letter. Stop the two terminals proposed for Grays Harbor, Washington. Protect our country
Response: Comment acknowledged.	

Commenter Name	Comment
Percival, Kari	Fossil fuel combustion is destrying our planet's atmospher and making our climate unlivable. Please end oil trains!
Response: Comment acknowledged.	
Perez, David	I know what you BASTARDS are trying to do. Tread carefully because there are certainty gonnabe obstructions along the way.
Response: Comment acknowledged.	
Perine, Susan	It is time to say NO! to the destruction of our IRREPLACEABLE RESOURCES just to make a few people richer!! This oil DOES NOT help America. It is sold to the highest binder....anyone. No effort to use the knowledge we have gained from science and tragic experience matters to these money mongers. Look at Oklahoma and the laws quie4ly put in place to steal and ruin land, water and natural resources for the use of FOR PROFIT OIL AND GAS COMPANIES with bare MINIMUM SAFETY REQUIREMENTS, INCLUDING minimum mandates for much needed EMERGENCY SHUT OFF VALVES. They literally lie, cheat and steal and rake in billions under the too poor noses of the citizens, with the full support of the government. EVERYONE but the citizens have a finger in the pie. My family fought for over a year to save our Indian land....we lost. No one has EVER WON against these companies. We fought in Oklahoma courts and in Washington D.C....and lost. They intend to take all they want and spend as little as possible at the expense of our health and resources. DON'T LET THIS HAPPEN ONE MORE TIME!!! HOW MUCH MONEY IS ENOUGH??? TRAGIC ACCIDENTS WILL HAPPEN.....AGAIN AND AGAIN. They DON'T CARE.
Response: Comment acknowledged.	
Perkal, Joyce	Oil and carbon are destroying the climate. Leave it in the ground.
Response: Comment acknowledged.	
Perkins, Mike	How many disasters does it take before the message sinks in? Peoples lives and the environment being put in dire peril because of gluttonous avarice of the few.
Response: Comment acknowledged.	
Pero, Beth	Let's stop dependence on fossil fuels. This planet cannot survive all these dangers of spills, accidents, and pollution. Thank you for reading my letter.
Response: Comment acknowledged.	
Perry, James	Keep it in your pants, keep it in the ground.
Response: Comment acknowledged.	
Person, Katie	Oil trains and tankers are "accidents" waiting to happen! Environmental and Economic issues in the region will be more negatively impacted in the wake of such "accidents" than would exist in the absence of the proposed terminal. Spills and explosions devastate communities for many, many years, if they recover at all. Do not support the Bakken Crude production!! It is negatively impacting the precious ground water in the heartland and leaving a trail of destruction all along its way. Invest financial resources in clean energy projects. Committing to oil expansion only benefits the oil company, not the community. They claim clean, safe practices, but do not be fooled! I have worked in oil spill response and have seen that there is nothing clean or safe about oil production. Ever! There is always a heavy price to pay.
Response: Comment acknowledged.	
Pesko, Russ	Enough of giving away our environment so Big Oil can make more money. Something must be done about safer transportation, but it has not happened. so, NO to the proposed oil terminals in Washington.
Response: Comment acknowledged.	
Peters, Michael	Why can't they just build a refinery in Montana and turn the oil into gas and connect it to the pipeline that already exists.
Response: Comment acknowledged.	
Peters, Toni	We don't need our land and harbors contaminated by crude oil.
Response: Comment acknowledged.	

Commenter Name	Comment
Petersen, Gary	Oil trains go too close to my house. I drive next to them through Monroe. I don't want to be put at risk so oil companies are massively profitable. End their tax breaks THEN let them pay for terminals. Until they aren't favored, I'm against them because it takes MY money to give them profits.
Response: Comment acknowledged.	
Petersen, Katie	We must show leadership to the world in the war on climate change! Put our money towards clean energy only!
Response: Comment acknowledged.	
Petersen, Steven	Keeping things clean is the most important concept to adhere to. It is so much easier to do this than to live with the dirt and try to clean up a dirty mess that was unconsciously created. Be conscious and keep the earth clean!!!
Response: Comment acknowledged.	
Peterson, Elaine	Thank you for reading my letter. Please take seriously the threat to this and other regions by possible and probable mishap. Too many accidents related to the transport of oil have already taken their toll on the environment. You know what happens. Please do the right thing this time!
Response: Comment acknowledged.	
Peterson, Elisabeth	Thank you for reading my letter. Fossil fuels are on the way out. Why risk our precious land and water, and all living things in them, for the threat of destruction!
Response: Comment acknowledged.	
Peterson, Elizabeth	Most Washingtonians are more interested in CLEAN energy - we do not favor using our state as a crude oil thoroughfare.
Response: Comment acknowledged.	
Peterson, Lydie Mae	Stop giving rights to transport crude oil from being transported across our country, and putting people in danger from oil spills, and dangerous explosions, and toxic waste seeping into ground. Water. Thank you for reading my letter. Lydie Mae peterson
Response: Comment acknowledged.	
Peterson, Merry Ann	I am not in favor of sending oil to China through Washington State ports. I hope and trust we can not be coerced into such a plan.
Response: Comment acknowledged.	
Peterson, R.D.	Thank you for reading my letter. Start using your money for sustainable-energy sources and research. Your "bottom line" mentality is wearing very thin...
Response: Comment acknowledged.	
Peterson, Thomas	We found energy resources to support our country's needs, but now corporations want to sell those resources for profit as fast as they can. When are OUR Citizens' Interest going to come first?
Response: Comment acknowledged.	
Peterson, Victoria	Haven't we learned enough from the damage oil spills have caused in the past?! Please stop this nonsense.
Response: Comment acknowledged.	
Petrarca, Emily	It isn't fair to put Washington State at risk for more catastrophic oil spills
Response: Comment acknowledged.	
Petrou, Olga	Please do not endanger our beautiful west coast to transfer oil. Too much is at risk!
Response: Comment acknowledged.	
Petrozza, Angelina	This is not the future we want.
Response: Comment acknowledged.	
Pfeifer, Ivan	Stand up to the oil industry now and slow the dangerous expansion of oil transport.
Response: Comment acknowledged.	
Pfoser, Susan	Let's try to keep out country CLEAN!
Response: Comment acknowledged.	

Commenter Name	Comment
Philippi, Eugene	It continues to amaze me that we consider such outrageous dangerous actions. Is my hope that the energy industry comes to senses a false hope. Energy has hundreds/thousands of smart people who know the danger of such proposals. Are there at least a few of them, in positions of power, who have sense of responsibility?
Response: Comment acknowledged.	
Phillips, Dr Cynthia & Paul	Oil trains already have a seriously horrendous track record. Look no further. We say absolutely NO to this form of oil shipment!
Response: Comment acknowledged.	
Phillips, Karen	Thank you for reading my letter. I am very concerned about the present state and the future of Earth's various environments. If we can foresee potential disasters, I believe we should proactively prevent them by not approving any new oil export terminals.
Response: Comment acknowledged.	
Phillips, Tanya	Thank you for reading my letter and I urge you to please consider my request.
Response: Comment acknowledged.	
Phillips, Thomas	The fossil fuel era is over. It's time to move on. Thank you for reading my letter.
Response: Comment acknowledged.	
Phillips, Weslie	Thank you for reading my letter.NO NO NOOOOOO!!
Response: Comment acknowledged.	
Picard, Susan	Not worth the risk to the communities through which the trains and tankers will travel. No second chances for our water and air.
Response: Comment acknowledged.	
Picciani, Laureen	disasters just waiting to happen for no real gain
Response: Comment acknowledged.	
Pierce, Debbie	The Earth including the people that have to habitat it is NOT available or at the mercy of/to the Oil Industry. If we want to heal our planet we have to stop allowing industries like Oil to continue to abuse it.
Response: Comment acknowledged.	
Pierce, Tanya	No more oil! Thank you for reading my letter.
Response: Comment acknowledged.	
Piercey, Joan	Having grown up in Washington, and spent years at our family's small motel in Westport, WA, I am deeply concerned at the possibility of endangering the environmental balance of Grays Harbor. PLEASE, I implore you...don't allow mankind to destroy yet another area and it's plant, marine, and animal life. Thank you for reading my letter.
Response: Comment acknowledged.	
Pigford, Terri	Stop dangerous oil transport.
Response: Comment acknowledged.	
Pihera, Lauren	Big Oil has used our nation's fear of being energy deficient as a free pass to ignore regulations, avoid responsibility for infractions, knowingly dump contaminated waste into local water sources, remain lax with safety precautions, pay almost no tax - in spite of huge profits, exploit the free market by colluding instead of competing each other, in their effort to control access to and remain the sole source for our energy needs. This strategy has resulted in Big oil amassing unprecedented profits, power and control at the expense of the public's economic status and health, the demise of wildlife on a grand scale, the deterioration of nature and the environment, and the corrupting influence on our free market and Democracy. Our ability to produce affordable, renewable energy is a certainty. And would be available in no time if Big Oil would cease putting up obstacles and obstructing positive plans, action and support for its research and development. We may need energy but we don't need to get it primarily from fossil fuels. New industry, jobs and growth will result from developing additional methods of producing energy. There are several types of renewable energy

Commenter Name	Comment
	sources that could be utilized, each requiring various methods, systems, and industries for its production from beginning to end. The economic result could only be positive with a future of expansion and growth. We must remember the lies, damage, and exploitation that Big Oil has left and continues to leave in its path, instead of believing their empty promises for the future and their warnings of doom and gloom if we refuse to indulge their requests, present and future, so Big Oil can maintain their monopoly to control and benefits from all of our energy needs in the future while we watch the damage progress.
Response: Comment acknowledged.	
Pikus, Barbara	Oil companies want to turn the NW into the next grubby, polluted, toxic Texas. I don't think so and I don't understand how the WA Dept. of ECOLOGY might even consider this. Equating this project with Ecology sounds like the opposite-speak spoken by many
Response: Comment acknowledged.	
Pilato, Ann	Move into the modern age and focus on renewable energy.
Response: Comment acknowledged.	
Pine, Veronica	Please keep our country safe!
Response: Comment acknowledged.	
Pines, Rochelle	I pray for our country
Response: Comment acknowledged.	
Pingle, Vikki	I appreciate your attention and subsequent action on this critical issue. Regards.
Response: Comment acknowledged.	
Pinkard, Florence	We dont want this.There is a high possibility of oil spills and carbon pollution.
Response: Comment acknowledged.	
Pinti, Ben	Thank you for reading my letter. When the risk outweigh the benefit, it is wise to not take the risk! Let us find a clean energy alternative. The oil business will still have huge profits while risking our health.
Response: Comment acknowledged.	
Pintor, Yvette	Lets look at history , and see how harmful it's been to the environment . Eg . Ecuador . We need not to hurt the earth or it's Inhabitants.
Response: Comment acknowledged.	
Pirozzoli, Victoria	Let's focus our "energy" on non-oil solution.
Response: Comment acknowledged.	
Pirtle, Curtis	stop rail an other oil trans porting. too meanly oil tankers have had too many spills.
Response: Comment acknowledged.	
Pitkin, Claire	Please do the right thing
Response: Comment acknowledged.	
Pitts, Frank	The transportation of dirty crude over the most beautiful part of our planet is not a sound decision. Make the hard choice for our long term environmental investment and put a stop to this future disaster now!
Response: Comment acknowledged.	
Plasse, Steve	We must begin to think of future generations and stop doing the bidding of dead-end industry. Thank you for reading my letter.
Response: Comment acknowledged.	
Plaviak, Beverly	Oil companies need to expand investment in safer energy! Thank you for reading my letter.
Response: Comment acknowledged.	

Commenter Name	Comment
Plavko, Kathy	Additional oil shipping terminals and oil trains are not in our best interest as a nation. As you know, oil spills are incredibly long-lived and not easy to contain much less mitigate. Please do not approve.
Response:	
Pliler, Sharalyn	Oil is the past. Get over it. Find alternatives. It's time to do what is right for the earth, not what will benefit a few people with personal wealth.
Response: Comment acknowledged.	
Ploss, Norm	North Dakota should be ashamed of the 'bomb trains' coming form its oil fields. Put a refinery in the state capitol of ND.
Response: Comment acknowledged.	
Pluta, Nancy	Thank you for reading my letter.Now is the time that we can act intelligently. Let us use the intelligence we have been given t o prevent worse damage and polution
Response: Comment acknowledged.	
Pogel, G	DO NOT EXPAND OIL TRANSPORT.
Response: Comment acknowledged.	
Pokorny, Tamara	Grays Harbor is not an appropriate place to site massive oil terminals. Impacts to the region cannot be mitigated and these projects should be denied. The only viable excuse for them is the pursuit of quick profit. They are not morally or rationally justifiable. Washington State can do much, much better.
Response: Comment acknowledged.	
Polekoff, Aimee	The people of Grays Harbor have made it clear that they don't support crude oil rail.
Response: Comment acknowledged.	
Polidori, Marguerite	The risks are not worth the expansion by oil companies. Keep our waters clean, our land and towns safe and fossil fuels in the ground by increasing our use of clean, renewable sources. It is necessary to stop the damage being done to our planet now before it is inhabitable for many people.
Response: Comment acknowledged.	
Pollack, Michael	Any expansion to accommodate new sources of fossil fuels is shortsighted and dangerous.
Response: Comment acknowledged.	
Pollino, Jim	stop the madness
Response: Comment acknowledged.	
Pollock, Robert	Money for health is NOT an option.
Response: Comment acknowledged.	
Pomeroy, Kimberly	Stop killing our planet!
Response: Comment acknowledged.	
Pomfret, Bonnie	At this point in the planet's destruction we should be giving public funding only for renewable energy
Response: Comment acknowledged.	
Ponall, Evelyn	Besides the ever present danger of environmental damage from a spill, with the need to move away from fossil fuels due to climate change, we should be slowing the transport of oil and gas and developing clean energy.
Response: Comment acknowledged.	
Ponce, Dora	Please do the right thing.
Response: Comment acknowledged.	
Poolos, Hazel	Thank you for reading my letter. Buuilding infrastructure for YESTERDAY'S energy sources is WRONG FOR US TODAY. The risks are too high. A dollar profit just to put millions of people's lives and livelihood and economy in harm's way for hundreds of years, if not forever.
Response: Comment acknowledged.	

Commenter Name	Comment
Pope, Stina	Expansion of oil shipping terminals on our coast is a VERY BAD idea.
Response: Comment acknowledged.	
Porter, Lisa	We have shown again and again that we can't do this without making tremendous mistakes. No more routes or ports!
Response: Comment acknowledged.	
Post, Cynthia	History has shown that there is no such thing as "safe" oil transport. Our communities and waters must be protected from the inevitable spills and accidents that would come with increased traffic.
Response: Comment acknowledged.	
Post, Fran	I am so concerned about potential accidents and what that will do to the people in the communities that live nearby. Please do not allow that plan to proceed.
Response: Comment acknowledged.	
Potter, Christopher	I was born in Washington and it is my family's home. This is not what we want for our home. Thank you for listening and acting.
Response: Comment acknowledged.	
Powell, Ellen	It's beyond the time to be using sustainable energy. Thank you for reading my letter.
Response: Comment acknowledged.	
Powell, Jeanne	It is a huge mistake to continue to develop ways to use fossil fuels. Burning fossil fuels is wrecking havoc with the world's climate, causing a warming trend which threatens to melt the polar ice caps and cause rising seas. If we value the world we leave our grandchildren, we MUST develop other, sustainable sources of energy. We can do this hard thing!
Response: Comment acknowledged.	
Powell, Kristina	Please keep working on better solutions.
Response: Comment acknowledged.	
Powers, Annette	This is a disaster waiting to happen. Predictable environmental destruction and personal suffering all for an industry we should be moving heaven and earth to move away from. Thank you for reading my letter.
Response: Comment acknowledged.	
Powers-Jaeger, Pat	NO OIL TRANS, could not sayit more plainly!
Response: Comment acknowledged.	
Prael, Felix	At a time when climate change requires us to end our addiction to fossil fuels, a project like this one fits the description suggested by an Australian former fossil-fuel executive in a "Sydney Morning Herald" op-ed: a crime against humanity.
Response: Comment acknowledged.	
Pratt, Rebecca	We have all witnessed the destruction that an accident can cause when something goes wrong with rail transport of crude oil. The impact is far reaching, affecting water, soil, wildlife, and the communities through which rail lines pass. In Oregon, where o
Response: Comment acknowledged.	
Presses, Dewey	Washington's coastline doesn't need, or want any oil shipping terminals. We don't need anything else that can "leak" and pollute/destroy the wildlife and natural landscapes.
Response: Comment acknowledged.	
Presswalla, Kamla	We must stop developing dirty energy and focus on renewable energy. We don't need to facilitate the use of more dirty fuel by helping it reach more people. Especially not for the profit of am already rich industry on the backs of communities who would take all the risk and little profit. We'd like to focus on future developments of renewable energy instead please.
Response: Comment acknowledged.	
Price, Laurie	There is no situation that should allow oil transport by rail. Railway accidents are horrible already; to add crude oil to derailed cars is unimaginable. Do not allow any new terminals to open.
Response: Comment acknowledged.	

Commenter Name	Comment
Price, Margaret	I have lived in downtown Seattle for 20 years. I'm appalled that this could happen along the WA coast. I'm on the coast weekly and can't imagine the extent of the risk to the wildlife, local communities, and economy. Please don't let this happen.
Response: Comment acknowledged.	
Price-Feinstein, Iona	I respectfully support this request.
Response: Comment acknowledged.	
Prinos, Alisa	No oil shipping terminals on Washington coasts!
Response: Comment acknowledged.	
Printz, Beverly M	lets stop these companies and save our country
Response: Comment acknowledged.	
Probst, James	leave it in the ground!
Response: Comment acknowledged.	
Promersberger, Austin	fracking and oil use is not helping climate change
Response: Comment acknowledged.	
Prothman, Bill	We don't need more fossil fuels to kill our earth by global warming! STOP THE BS!
Response: Comment acknowledged.	
Provost, Ramona	Please do not compromise our environment for the greed of fossil fuels. It is time we concentrate on alternate energy supply. Thank You.
Response: Comment acknowledged.	
Prushinski, Robert	Save our lands. Thank you.
Response: Comment acknowledged.	
Pucci, Joshua	Please make good decisions.
Response: Comment acknowledged.	
Pugh, Nancy	The proposed terminals in Grays Harbor pose much too great a risk to the people and the environment of that community, as well as to many surrounding areas.
Response: Comment acknowledged.	
Pugliese, Maria	Washington's forests are too beautiful to destroy directly or indirectly. Grays harbor is a special place and I have spent much time there. It's too beautiful for your filthy industrial practices. Leave the whole Northwest alone!
Response: Comment acknowledged.	
Puntch, Ann	Thank you for reading my letter. I live next to a refinery that CAN'T process tar sands....or serve as an export platform.
Response: Comment acknowledged.	
Punte, William	We have only one planet lets not kill it and thank you for reading my letter.
Response: Comment acknowledged.	
Purcell, Rebecca	Using oil and investing in oil production by allowing them to essentially go where they will is not worth it - there are too many accidents waiting to happen.
Response: Comment acknowledged.	
Pyles, David	I live in Washington and visit your area, it is not worth taking the risks involved with this venture.
Response: Comment acknowledged.	
Qolas, P.J.	please stop it!
Response: Comment acknowledged.	
Quach, Jennifer	Don't let this happen in Washington! Remember Exxon Mobile, Horizon, the rest! Come on!

Commenter Name	Comment
Response: Comment acknowledged.	
Qui, Susie	Keep fossil fuels OUT of Oregon!!
Response: Comment acknowledged.	
Quigley, Linda	We have to move away from fossil fuels. Please provide the leadership we need to move towards sustainability. Be the leaders we elected you to be.
Response: Comment acknowledged.	
Quigley, Louise	Oil needs to be left in the ground, not exported to be burned and increase greenhouse gasses. Money spent for pipelines and terminals would be better spent on developing renewables and exporting that technology. Thank you for reading my letter.
Response: Comment acknowledged.	
Quinn, Edythe Ann	As a college professor, I teach Environmental Injustice and surely such trains and barges and terminals and other associated infrastructure are a major injustice to communities and the land. Thank you for reading my letter.
Response: Comment acknowledged.	
Quinn, Joan	Protect us from the great danger of these oil shipping terminals
Response: Comment acknowledged.	
Quinn, Paul	Stop this now!
Response: Comment acknowledged.	
Quiroga-lassepas, Carlos	We need to focus on alternatives not facilitating a business as usual operating mode. What is good for the petroleum industry is seldom what is good for the people you represent. Thank you for reading my letter.
Response: Comment acknowledged.	
Rabey, Julie	I have lived in Grays Harbor all my life. I do not want oil shipping terminals here. It is not a good fit for our community which relies on clean water for fishing and shellfish.
Response: Comment acknowledged.	
Rabin, Keith	Thank you for reading my letter. Stop raping then profiting on public lands, public resources and have no means of safe transport because you refuse to refine at site.
Response: Comment acknowledged.	
Rabjohns, Tracey	Let's plan for the future. Promote clean energy.
Response: Comment acknowledged.	
Racines, Alexandra	Thank you.
Response: Comment acknowledged.	
Rae, Michele	There are too many environmental/health problems with pipeline leaks. there are too many problems with the cost in relation to graft, and very many fewer jobs than falsely advertised. NOT TO MENTION (but I will) that the oil often goes right to some other country!
Response:	
Rafiq, Eman	Save the environment!!
Response: Comment acknowledged.	
Rain, Patricia	Thank you for reading my letter. While I'm all in favor of using rail transport for a lot of goods, explosives such as crude oil are a different issue. Ask anyone who experienced the disasters in Quebec or in our country and it becomes very clear that moving crude oil is extremely dangerous on land or by ocean tanker. The reality is we must move away from fossil fuels for a long list of reasons. Spills are inevitable no matter how hard we may attempt to keep them from happening. We have a huge overabundance of carbon in our atmosphere already. And fossil fuels are finite. I am strongly opposed to transporting crude oil, tar sands and other toxic, volatile products.
Response: Comment acknowledged.	

Commenter Name	Comment
Raitt, Jacob R.	Are we really so stupid as to continue to allow our nation's lands and its inhabitants to constantly be exposed to toxins?
Response: Comment acknowledged.	
Rall, Carol	We need to think in terms of the future and for the earth's sake.
Response: Comment acknowledged.	
Ramirez, Karla	Thank you for saving our future.
Response: Comment acknowledged.	
Randle, John	No oil and gas exports!
Response: Comment acknowledged.	
Randolph, Anne	I appreciate your taking the time to consider my comments. Thank you.
Response: Comment acknowledged.	
Randolph, Dee	I hold my breath each time these oil cars pass less than a mile from my home, wondering if my insurance covers damage caused by oil car explosions or derailments.. I know oil companies don't give a frosty crank, but would love them to prove me wrong. Howe
Response: Comment acknowledged.	
Ranz, Gary E.	Thank you for reading my letter. Our son & his wife live in Washington & already deal with coal trains on a daily basis. They do not need more railroad traffic.
Response: Comment acknowledged.	
Rapalyea, Angela	Thank you for reading my letter. Time to take much better care of the land and water table
Response:	
Raphael, Joan	We do not need to have still more polluted cities, and the trains will be dangerous as shown by spectacular accidents in Canada. Thank you for reading my letter.
Response: Comment acknowledged. Comment acknowledged.	
Rapp, Neville	STOP thisDn idea!
Response: Comment acknowledged.	
Rasbury, Patricia	Tar sands are the most heavily polluting form of fossil fuel and require vast amounts of water which is ruined forever. Transport of crude oil and tar sands has consistently proven environmentally risky whereever it has occurred.
Response: Comment acknowledged.	
Raschiatore, Lorraine	Didn't we not just get the wake up call of the recent explosion of the transport train in North Dakota? This same train that WASN'T supposed to be transporting crude oil. You would have to be dumb to not realize how DANGEROUS and UNRELIABLE this method of transportation is? Oil companies do not care about the environment nor the people of USA.
Response: Comment acknowledged.	
Rastetter, Scott	Stop the insanity,correct your path this is not the future we want.
Response: Comment acknowledged.	
Ratliff, Cynthia	Thank you for reading my letter. We must invest in new technologies, not fracking which is destroying our water tables but wind and air which are dropping in cost.
Response: Comment acknowledged.	
Ratti, Bridget	There are other ways our country is beautiful. Please don't make it an industrial site.let's look at Our new and improved site seeing guide for America to your right biohazard park to your left oil spills. And right in the middle smog and sick people. No thank you. Save our country our air and our water and people from the side effects of this ugly industry. There are other ways America Sincerity Bridget
Response: Comment acknowledged.	
Rauch, Stacy	To continue focusing on fossil fuels is a tragic mistake. We need to be focused on the future and working to develop and utilize renewable energies. Thank you for reading my letter.

Commenter Name	Comment
Response: Comment acknowledged.	
Raven, Resa	Keep our land and waterways safe. Say no to the proposed terminals.
Response: Comment acknowledged.	
Raven, Robert	Tankers going through cities, past our schools and rivers= they might crash, catch fire, disrupt large areas, pollute rivers, and increase climate calamities.
Response: Comment acknowledged.	
Ravenscraft, DH	Thank you for protecting our environment for future generations!
Response: Comment acknowledged.	
Ray, Glenda	We have to reduce any chance of pollution, killing and poisoning to all living animal, fish, marine life, and human beings.
Response: Comment acknowledged.	
Ray, Linda	Now is the time to switch to clean, sustainable energy and stop the dangerous oil trains.
Response: Comment acknowledged.	
Raye, Joyce	Please act now to Stop Two Oil Shipping Terminals. proposed for Grays Harbor, Washington. We should preserve our fragile, marine environment and fisheries near Grays Harbor, from the threat of crude oil pollution from risky increased oil transport by oil tankers and rail cars. Any oil spill would be a disaster for this sensitive coastal marine environment, which so many groups depend on for their livelihood, including fisherman, tourist businesses, and tribal cultures. Draft environmental reviews state that adequate mitigation is not possible, and damage to the environment would be significant, and far reaching. Please help us in this urgent matter. Thank you, Prof. & Mrs. David Raye
Response: Comment acknowledged.	
Reader, Mary & Rev. Robert	This is not the future we want for our grandchildren, which include one environmentalist.
Response: Comment acknowledged.	
Reardon, Matthew	Thank you for reading my letter. This is an awful idea. Please reject.
Response: Comment acknowledged.	
Rederer, Hali Rederer	We really do not want all this crude oil production. We need to pivot away from fossil fuels as our primary energy source. Definitely transporting it to pristine West Coast terminals is not what we want.
Response: Comment acknowledged.	
Redick, Mary	It is so beautiful and special in Grays Harbor. Don't risk it!
Response: Comment acknowledged.	
Redmond, Cameron	Thank you for reading my letter about this scary proposition. We do not need to be building our infrastructure around something so harmful. We need to build around the energy of our sun, invest in other forms of viable energy. Oil is dirty, dangerous, non renewable. Please do not allow our country to become a oil hub, rather let it be a clean energy hub!
Response: Comment acknowledged.	
Reed, Claudia	I live on the coast of Florida. If a selfish entity tried in a similar fashion here to ruin the natural beauty that belongs to us all, I would be outraged. Greedy actions that do great harm to others should not be condoned.
Response: Comment acknowledged.	
Reed, Mary	It's time to move beyond fossil fuels. Refusing to allow the construction of these oil export terminals is a step in the right direction.
Response: Comment acknowledged.	
Reed, Patricia	Please do not turn our country into a crude oil transport. We can not afford the dangers that come with it to our water and land. Please vote no!
Response: Comment acknowledged.	

Commenter Name	Comment
Reel, Judee	Oil is a terribly destructive way to get energy. It is a bad choice from every angle. I don't like it.
Response: Comment acknowledged.	
Reep, Irene	We already have way more volatile and polluting oil coming thru the NW than we should burn to keep global warming from getting worse than already is. NO OIL CORRIDOR thru the NW!!!
Response: Comment acknowledged.	
Reer, Lynn	Please protect your precious community.
Response: Comment acknowledged.	
Rees, Hannah	We live a block away from rail tracks where tankers of oil are often rumbling by waiting to explode. We do not need to increase this risk. It is very unnerving already.
Response: Comment acknowledged.	
Reese, Timothy	We can't afford an oil spill in Grays Harbor. Let them put the transport terminal in the Koch brothers front yard!
Response: Comment acknowledged.	
Reeve, Sharon	We understand the risks we face with these oil industry proposals, and we don't think they're worth it.
Response: Comment acknowledged.	
Regan, Nora	No more oil spills ! No more volatile explosions causing deaths and long-term damage. These terminals are a formula for environmental disaster. We know that we cannot trust big oil to care even a little for the welfare of the little people and the other creatures who reside in their ecosystems. Stop beating a dead horse and use your ill-gained wealth to create clean energy for the planet before we all go down.
Response: Comment acknowledged.	
Register, Shannon	Save the World
Response: Comment acknowledged.	
Reichmann, Peter	The tanker trucks or the oil carrying train cars need to be specially reinforces to minimize spillage.
Response: Refer to Final EIS Section 4.2, *Applicable Regulations*, for a description of the requirements for transporting crude oil by rail.	
Reid, Linda	I support the use of railroads; it would be wonderful to get more of those semi trucks off the highways. However, I do not want the oil industry to be more a polluter; it is scandalous how little they are regulated and how few of the assessed fines they actually pay. Please stop the spread of railroad usage by the oil companies and how about collecting the billions of dollars in fines the mining industry owes. Now that would help the US budget. Sincerely, Linda Reid
Response: Comment acknowledged.	
Reid, Roberta	It is inconceivable that transporting crude oil in such a manner is both dangerous and an accident in the making. Safety over Profits should be the mantra of oil companies to concern themselves with the well being of American citizens and nothing less.
Response: Comment acknowledged.	
Reid, Sarah	FOSSIL FUELS DAYS ARE OVER. SO ALSO MUST BE THE TRANSPORT OF THESE DANGEROUS POLLUTANTS.
Response: Comment acknowledged.	
Reidy, Katherine	Thank you for reading my letter. I agree that the oil industry should not be shipping volatile Bakken crude and toxic tar sands from Canada by rail through ANY community... increasing the risk of an oil spill, fire, or explosion and exporting global warming harm. Thank you.
Response: Comment acknowledged.	
Reiff, Theresa	Another environmental disaster on the planning board.
Response: Comment acknowledged.	
Reilly, Emma	I

Commenter Name	Comment
Response: Comment incomplete.	
Reiners, Carl	Canada, find or build your own refinery and port.
Response: Comment acknowledged.	
Reis, Jane	Please help Washington State move away from fossil fuels and towards clean, renewable energy.
Response: Comment acknowledged.	
Reiser, Beata	Please protect our communities from oil spills & carbon pollution from increased oil rail traffic, putting the local economy ,tribal culture, & our ocean & coastlines at risk.
Response: Comment acknowledged.	
Reisman, Rita	Please do all you can to stop the oil industry's dangerous expansion of oil transport. There is absolutely NO security when it comes to the transportation of oil. Once a pipe breaks, a train derails or a boat leaks, our environment is contaminated well beyond our ability to repair it. The Exxon Valdez spill has never been successfully cleaned up, nor has the spill in the Gulf. Too many trains in the Dakotas have derailed and exploded. No one has reported on a consistent basis, the damage they have caused. Please do all in your power to stop this unnecessary expansion and transporation of fossil fuels.
Response: Comment acknowledged.	
Reitz, James	These terminals should not be expanded unless the safe transport of oil trains is assured.
Response: Comment acknowledged.	
Rekdal, Sheila	LEAVE IT IN THE GROUND> GO SOLAR NOW!
Response: Comment acknowledged.	
Remmich, Timber	Please stop taking from this Earth. Please do the right thing. Thank you for your time. Sencerly, Timber Remmich
Response: Comment acknowledged.	
Renehan, Janet	Thank you for reading my letter. We need to be winding down our use of fossil fuels. Let's stop expandingoil terminals, and focus on renewables. I want a future for my grandchildren. Oil is going the way of the horse and buggy. The rest of the world is ahead of us on this. Last but most important,; We are in danger of spills and leaks with all this extreme weather. This is not the future I want.
Response: Comment acknowledged.	
Rennacker, Ann	Keep the dirty oil trains from coming through American towns, risking explosions and fires that are ruining the climate and endangering the citizens. Thank you for reading my letter.
Response: Comment acknowledged.	
Reppa, Douglas	Its not 'if a disaster will occur, its 'when' and how many generations will be impacted. History has shown it to be so.
Response: Comment acknowledged.	
Resin, Robin	Thank you for reading my letter. It is very distressing to me that I have to keep writing and sending letters to people in Congress to protect the environment of this beautiful country.
Response: Comment acknowledged.	
Revord, Michael	Let's not wait for another train explosion before we act.
Response: Comment acknowledged.	
Reynolds, Mary	Thank you for reading my letter. We need to stop pandering to the oil industry. I'm doing my part to use renewable, clean energy because we have to stop destroying our environment.
Response: Comment acknowledged.	
Reynolds, Neal	Please protect our communities and country!!!
Response: Comment acknowledged.	
Reynolds, Patricia	Depleting our resources to fund the China manufacturing machine....how dumb can we be...

Commenter Name	Comment
Response: Comment acknowledged.	
Reynolds, Ray	Monday more oil! We have enough gas guzzlers on our planet!
Response: Comment acknowledged.	
Rhodes, Lee	please stop enabling the old fossil fuel industry. put the approvals and avenues in place to open the doors for transforming the infrastructure to renewables.
Response: Comment acknowledged.	
Rhyno, Travis	Damage done takes a long time to be undone.
Response: Comment acknowledged.	
Rice, Ocea	leave the oil in the soil.
Response: Comment acknowledged.	
Rice, William	Let's spend the money on eco friendly energy projects like wind, wave, hydro, geothermal, and solar.
Response: Comment acknowledged.	
Rice-Coughlan, Virginia	No one wants this oil--leave it in the ground!
Response: Comment acknowledged.	
Rich, Lana	The crude oil pipeline, besides being dangerous , should not be built because the crude oil pollutes, and even if it did not, none of the crude oil will be refined in this country, but will be shipped abroad. We do not have to be a pipeline ;for other countries use.
Response: Comment acknowledged.	
Richards, Barbara	Leave it in the ground so my grandchildren will have a planet that supports human life.
Response: Comment acknowledged.	
Richards, Lawren	Bitumen is not oil; shipping it is far more risky than shipping oil. It should be refined at point of extraction or left in the ground. Don't allow it to be shipped through the US!
Response: Comment acknowledged.	
Richardson, Gail	We believe that the energy industry must be forced kicking and screaming into the future of energy sustainability. We don't want dirty oil transported through our town. We are sick and tired of Big Oil's stranglehold on our nation. Just say no, for all of us. Thank you for reading my letter.
Response: Comment acknowledged.	
Richardson, Vicki	It's not all money. We need always to consider our environment. After all it's where we live.
Response: Comment acknowledged.	
Richey, Sylvia	Keep oil in the ground. Promote sustainable energy.
Response: Comment acknowledged.	
Richter, Virginia	Keep Washington Clean
Response: Comment acknowledged.	
Richters, Greg	In light of the ecological dangers posed by continuing use of crude oil and the lack of any future benefit to society as a whole, any expansion of shipping infrastructure is not economically or socially acceptable.
Response: Comment acknowledged.	
Ricklefs, Robert	STOP EXPANDING OIL SHIPPING TERMINALS!
Response: Comment acknowledged.	
Riddle, Carolyn	Let's use these resources to promote alternative energy instead of continuing to destroy the habitability of our planet.
Response: Comment acknowledged.	

Commenter Name	Comment
Ridenour, Patty	Just who do the Big Oil Boys think they are? They cannot be allowed to thoughtlessly endanger the countless lives of people in communities clear across this country just so to service their insatiable GREED.
Response: Comment acknowledged.	
Rider, Alan	The President has rejected the Keystone pipeline, That tells me we do not want or need more transporting of oil in my COuntry. Note that oil companies now want to EXPORT our oil! WE HAVE A LAW AGAINST THAT. WHAT HAPPENED TO MAKE THE US self reliant?
Response: Comment acknowledged.	
Ridgway, Sarah	Stop the oil terminals proposed for Grays Harbor, Washington!
Response: Comment acknowledged.	
Riedl, Tom	We ness LESS, not more OIL - isn't that clear by now?
Response: Comment acknowledged.	
Riedman, Laura	No Oil here!
Response: Comment acknowledged.	
Riekki, Laurice	Our family has traveled for vacations and camping to the greater Washington coast, including Westport, Grayland and Ocean Shores for several decades. I strongly urge you to not put this beautiful coastal area, its human, marine, and animal lives in jeopardy by building oil shipping terminals in this area.
Response: Comment acknowledged.	
Ries, Amy	Please DO NOT ALLOW this to happen.
Response: Comment acknowledged.	
Riger, Richard	Keep this country clean, don't turn it into an oil sewer for the profit of poluting BIGPIGS at the expense of our health.
Response: Comment acknowledged.	
Riggs, Kathy	As a camper along the Moyie River in Northern ID I suddenly became aware of the dangers to our river systems. Multiple oil trains rattle down this narrow valley from Canada on a daily basis. One tiny spill could ruin this pristine river for decades. Since that excursion my awareness of the precariousness of our rivers has been heightened. Most trains chug along river valleys, along lakes, crossing them on questionable bridges and trestles. The Pacific North West is filled with clear Rivers and pristine lakes, with ancient aquifers flowing through and underneath them. It's not just the seaside that is threatened. It is all the waterways on the way to sea ports. Please work to protect our waters. Once polluted, always polluted. Dilution is not the solution. Prevention by reduction and improvement of our roads and railways is imperative. Let's use our brains for more than a place to rest our hats and please cut the jugular of greed.
Response: Comment acknowledged.	
Rigney, J	The oil industry can't seem to transport their product without spillage that destroys land and whoever/whatever lives on it.
Response: Comment acknowledged.	
Riley, Lucas	I will keep this simple. The people don't want the risk, the noise, the wretched pollution. We must do what we can to protect our people and our environment. Oil companies don't care about the lives of the people. Show them that you, that we, see through them and don't want their risks. We are moving on as a world away from oil, we don't need this dangerous transportation of volitile "energy". Thank you for reading my letter.
Response: Comment acknowledged.	
Rinehart, Wendy	It is about time that environmental factors and animal welfare were put first, before human greed and ignorance.
Response: Comment acknowledged.	
Rines, Lora	Stop destroying our world. What next?
Response: Comment acknowledged.	
Rios, Delmis	It is time to Take Action and stop those ruining our environment.

Commenter Name	Comment
Response: Comment acknowledged.	
Riphenburg, Dennis	We must stop the destruction of our only home! All who breathe oxygen here, and most importantly those who lead our governments must realize we are heading our planet down an unreversable and dangerous path. Our planet is dying, and because of the way we have chosen to live. It is imperative that we change the way we think!
Response: Comment acknowledged.	
Ritchie, Shann And Dennis	Until Congress gives enough money to repair our rail lines across the country, it is insanity to expand shipping terminals anywhere in the U.S. Taking crude oil over thriving marine waters would put the health and safety of communities, the local economies, tribal cultures, and our ocean and coastlines at major risk. DO NOT EXPAND DANGEROUS OIL TRANSPORT
Response: Comment acknowledged.	
Ritchie, Stuart	Thank you for reading my letter. I believe it was a Cree Indian prophecy that said, "only when the last tree is cut down... the last river poisoned... the last fish caught... will you realize that money cannot be eaten."
Response: Comment acknowledged.	
Ritter, Philip	Thank you for reading my letter and remember for every action there is an equal and opposite reaction. We have an obligation to do no harm.
Response: Comment acknowledged.	
Rivard, Kathleen	It's time to step away from fossil fuels. It seems that spills on the West Coast are becoming more frequent and no one steps up to take the blame. Our people and wildlife suffer from this blatant non caring attitude. Enough is enough! We must unite to stop this rape of the land.
Response: Comment acknowledged.	
Rivendell, Laura	We should not take the risk of oil spills and we need to transition to a severely carbon-reduced economy. This is a great place to start the turn-around!
Response: Comment acknowledged.	
Rivet-River, Jacqueline	Think of our/your children and grandchildren. Stop thinking of money, think of healthy generations to come. Thank you.
Response: Comment acknowledged.	
Roarke, Jim	Due to the increase in accidents via shipping by rail and the toxic nature of the petro-chemical products being shipped, I urge you to take action to tighten regulation and over-sight of this process.
Response: Comment acknowledged.	
Robbins, Julie	I cannot stress enough just how important it is to our environment to stop putting big oil money ahead of every other thing that truly matters. Please do not let this continue. Thank you!
Response: Comment acknowledged.	
Robert, Brett	You need to put your resources and time into creating renewable fuel infrastructure instead of creating problems with more fossil fuel infrastructure. Start the transition now and stay in business forever!
Response: Comment acknowledged.	
Roberts, Janet	it's not enough to stop building pipe lines but the constant derailing of tankers carrying oil near water and close to neighborhoods is outrageous! The sheer number of 'accidents' is be- yond belief! Keep fossil fuels in the ground, please.
Response: Comment acknowledged.	
Roberts, Martha	This is important to me!Thank you for reading my letter.
Response: Comment acknowledged.	
Roberts, Ruth	The prospective economic gains are at best short-term; the damage to agriculture, the marine economy, quality of life in general, is permanent.
Response: Comment acknowledged.	

Commenter Name	Comment
Robichaud, David	The world needs to keep the fossil fuels in the ground. No further development of this backwards industry. Grays Harbor in particular has ecological importance and show not be ruined by short sightedness.
Response: Comment acknowledged.	
Robin, Andrew	Now is the time to stop locking ourselves into more decades of dirty, CO2-polluting energy. Thanks for your consideration.
Response: Comment acknowledged.	
Robinette, Thomas	I'll bet Grays Harbor wants to get rich BEFORE THEY DIE in the first oil explosion
Response: Comment acknowledged.	
Robins, Kristen	Bakken crude is a bit too dangerous to transport - wouldn't it be better to refine it locally before putting it onto a train?
Response: Comment acknowledged.	
Robins, William	This is a dangerous and dirty business we don't need to be in.
Response: Comment acknowledged.	
Robinson, Daniel	PLEASE DO THE RIGHT THING!
Response: Comment acknowledged.	
Robinson, Kay	As we have seen in the past oil is dangerous especially to the ocean and its wildlife. Stop this for the good of the environment.
Response: Comment acknowledged.	
Robinson, Laura	Please do not allow the transport of these dangerous and dirty fossil fuels. It is time to move away from fossil fuels. Please help our state move in the right direction
Response: Comment acknowledged.	
Robison, David	Expanding distribution of this planetary poison is ludicrous. Leave it in the ground to protect the future of our environment for my kid and yours.
Response: Comment acknowledged.	
Robison, Sandra	Keep the Evergreen state green, keep polluting industry out.
Response: Comment acknowledged.	
Roby, Maryann	For our survival, we need to totally get out of building infrastructure for fossil fuels - our efforts and our money needs to be spent on renewables.
Response: Comment acknowledged.	
Roche-zujko, Kathleen	Shipping oil is a bad idea. We need modern ways of powering our society; not the old, dirty, polluting fossil fuels.
Response: Comment acknowledged.	
Rockstad, Carol	Grays Harbor an area with a ecosystem that must be protected from potentially dangerous toxins, oil spills and to say the least for human livelihoods and safety. Please vote no to building a terminal in Grays Harbor.
Response: Comment acknowledged.	
Roddy, Barbara	The proposed terminals and rail traffic pose a great threat to the fragile environment and important watersheds in Grays Harbor. The area is just now recovering from the devastating clear cut logging that nearly destroyed fishing and wild life in that area. There are no guarantees that an accident or spill can be totally prevented. It is not worth the risk to the environment or the population of Grays Harbor for the reward of a few local jobs. Please don't allow this to happen.
Response: Comment acknowledged.	
Roderer, Sara	We need to stop transporting oil in newly constructed pipelines and start a large scale carbon reduced economy with green technology. We need to encourage other nations to invest in green technology as well instead of transporting massive tankers of oil around the world!

Commenter Name	Comment
Response: Comment acknowledged.	
Rodgers, Jill	Clean energy should be the only thing we support
Response: Comment acknowledged.	
Rodgers, Patricia	This should not be even considered. The potential for a disaster such as the Exxon Valdez is obvious. Please do not pander to the rich investors who only want to get richer.
Response: Comment acknowledged.	
Rodriguez, Joel	Try investing in 21st century infrastructure. Innovate or die.
Response: Comment acknowledged.	
Rodriguez, Sylvia	Thank you for reading my letter. I am very afraid of these transports. Do not allow this to happen.
Response: Comment acknowledged.	
Rogalski, Marjorie	It's imperative that we move away from fossil fuels and invest in renewable energies ASAP
Response: Comment acknowledged.	
Rogers, Anne	Transporting these volatile materials from Canada has shown to be fraught with risks. Why build more facilities for these hazardous transports when it is time to move toward safer, cleaner and renewable energy?
Response: Comment acknowledged.	
Rogers, Sally	Thank you for reading my letter.Please help us!!
Response: Comment acknowledged.	
Rognlien, Gordon	Stop harming the word - stop pollution - stop destroying the planet,
Response: Comment acknowledged.	
Role, Nathaniel	This would also stop the transport of hazardous oil through Idaho. Most Idahoans are opposed to this train traffic, but are helpless to prevent it (our politicians are working against their voters!). Thanks for helping Idaho when our politicians are not.
Response: Comment acknowledged.	
Roller, John Michael	Stop this nonsense about oil transport through our country before there is irreparable damage done because of a major leak/spill.
Response: Comment acknowledged.	
Rollings, Andrew	+ Getting energy from oil is dirty, dangerous, explosive and obsolete. +Transporting it has similar risks. +Fossil fuels are known to be VERY harmful for the planet. + Solar, wind and other clean, safe renewables are the modern sources of energy. +
Response: Comment acknowledged.	
Roman, Marissa	Stop fossil fuels. Invest in clean energy!
Response: Comment acknowledged.	
Romanelli, Karen	Protecting our water and land for the generations that follow should be our first priority and working putting more resources into the development of alternative energy sources for them our second. Oil production and transportation does nothing to support these two priorities and everything to threaten them.
Response: Comment acknowledged.	
Romero, Mary	Keep America free and safe.
Response: Comment acknowledged.	
Romolino, Leslie	Thank you for reading my letter. CARE
Response: Comment acknowledged.	
Ronchetti, Dr. Francesco	I totally support this campaign, and I want to recommend to everybody: "DRIVE THE LEAST YOU CAN!" Your contribution to the environment starts from your daily actions!

Commenter Name	Comment
Response: Comment acknowledged.	
Rooks, Alyssa	The increased extraction and transport of these oils is very risky and destructive. Human and environmental health should be a priority over monetary gain.
Response: Comment acknowledged.	
Rooney, John	Thank you for reading my letter. I have nine Grandchildren whose world must be protected.
Response: Comment acknowledged.	
Rosa, Angelease	STOP THE DANGEROUS EXPANSION OF OIL TRANSPORT IN YOUR STATE!
Response: Comment acknowledged.	
Rose, Arthur	Please protect our environment!
Response: Comment acknowledged.	
Rose, Jeff	No oil trains of death running through our cities!
Response: Comment acknowledged.	
Rose, Shakti	Let's move toward clean energy, not dirty.
Response: Comment acknowledged.	
Rose, Steve	Thank you for reading my letter. Please consider the consequences of no action.
Response: Comment acknowledged.	
Rosenblum, Stephen	We need to keep fossil fuels in the ground. No new infrastructure to extract or process it should be built.
Response: Comment acknowledged.	
Rosenfield, Clare	Thank you for paying attention to this crucial issue which is just the opposite of the sustainable responsible type of policies we want our leaders to take.
Response: Comment acknowledged.	
Rosenthal, Andrew	Let's think of future generations!
Response: Comment acknowledged.	
Rosin, Lawrence	The oil can leak into the ocean while being moved and pollute it.
Response: Comment acknowledged.	
Rosko, Laura	This cannot be good! Please, do not let this happen!!
Response: Comment acknowledged.	
Ross, Carolyn	Thank you for reading my letter. This is a critically important issue for the health and wellbeing of so many Americans.
Response: Comment acknowledged.	
Ross, Linda	Enough of toxic oil. God gave us clean energy in sunshine, wind and water-- they are our 'salvation'!
Response: Comment acknowledged.	
Ross, Lucy	Just say no to ruining our beautiful country with more traffic, oil spills and more carbon pollution! Thank you!
Response: Comment acknowledged.	
Roth, Donald	Thank you for reading my letter. A pipeline is in effect a robot taking jobs from rail. When all the work is done by robots, who will own the robots?
Response: Comment acknowledged.	
Roth, Robert	Only can accept this move by oil companies with TOP_NOTCH security plans.If none,then NO!.
Response: Comment acknowledged.	
Rothman, Sarah	Our attention, time, and energy would be better spent focused on ways to build infrastructure for renewable resources.

Commenter Name	Comment
Response: Comment acknowledged.	
Rowe, David	If we put our resources into alternative energy we can stop all of this nonsensical warring in the middle east for oil and move away from the continued damage to our ONLY environment. The Political process of our county has GOT to stop sucking up to big oil, banks and the politicians that represent them!
Response: Comment acknowledged.	
Rowe, Jeannette	I really mean that I do not want trains or trucks to move oil anywhere in our country, the USA. Oil and coal should be left in the ground. It is very unfortunate that some people will lose their job. I really do regret that. But we had better build a better country for those who are on earth after we leave.
Response: Comment acknowledged.	
Rowland, Rhys	I am strongly opposed to continuing to develop fossil fuel sources of any type as I believe there are many other ways to meet our country's energy needs that are sustainable. It is readily apparent to me and most of the scientific community that our actions to continue to harvest fossil fuels and use them is contributing largely to the changing climate patterns that we have experienced in the western US. We would do well to focus our efforts on developing alternative sources and become independent of oil not only for its global climate effects, but additionally to get our country out of the mid-east and all the volatility of the region. This course of action would also help to leave ecologically sensitive areas from being despoiled by oil exploration and extraction particularly from fracking and shale extraction. Thank you for reading my letter on the subject.
Response: Comment acknowledged.	
Ruby, Kenneth	Oil transport places us all in dire jeopardy; it is senseless. Ban oil transport now and move quickly to renewable energy infrastructure.
Response: Comment acknowledged.	
Rucker, Barbara	Thank you for reading my letter. At some point we must put the future of our children and the planet above the interests of corporations. The time is now.
Response: Comment acknowledged.	
Rudisill, Amanda	New oil terminals in WA state are unacceptable as we support an ever green future for energy.
Response: Comment acknowledged.	
Ruditis, Jana	Thank you for reading my letter. Why damage something irreplaceable with something that is replaceable. Carbon energy must be replaced NOW for the planet to thrive. Don't waste time, money and energy building something antiquated. Don't harm the environment with your lack of vision.
Response: Comment acknowledged.	
Rueli, Michael	Thank you for reading my letter. It is PAST TIME to NATIONALIZE the DIRTY ENERGY industries! See Norway
Response: Comment acknowledged.	
Ruggiero, Emma	A spill in the Grays Harbor area would destroy critical shorebird habitat on the Pacific Flyway and a profitable and important comemrcial, private and recreational fishing hub for coastal washington state. Please act to protect our environment and small local businesses dependent on a healthy and clean Grays Harbor and act to block both proposed oil terminals in Grays Harbor.
Response: Comment acknowledged.	
Ruhl, John	This is not the way to transport crude oil. Our rail system is substandard and the crude oil cargo is too dangerous.
Response: Comment acknowledged.	
Ruland, Kate	if the xl pipeline had been rejected so should the terminals for grays harbor
Response: Comment acknowledged.	
Rumskas, Martha	Thank you for reading my letter. IT IS TIME WE STOP BIG COMPANIES FROM RUINING OUR PLANET AND OUR LIVES!
Response: Comment acknowledged.	

Commenter Name	Comment
Rusch, Brenda	The expansion of crude oil trains is too dangerous for local communities. We must look for better energy solutions---solar and wind especially. If we continue to use dirty fossil fuels, we may not have a planet left to give our grandchildren and great-grandchildren.
Response: Comment acknowledged.	
Rusch, Diane	Bottom Line: We need to move away from fossil fuels and focus on renewable energy NOW...if we want to have a livable planet for our children and grandchildren.
Response:	
Rusczyk, Heather	I lived in Washington as a child and every day I picked the worms of the street and put them in gardens for safety. I am sick to think anyone would want to destroy life for laziness.
Response: Comment acknowledged. Comment acknowledged.	
Rush-Osborn, Marbro	Thank you for reading my letter. I'm familiar with the train tracks near Chahalis by riding AMTRAK. Those lines are constantly under repair from erosion and over use as it is. Living along the Mississippi River, we've had two separate derailments that have sent oil products and other chemicals into the river. Again, because of erosion along the tracks. Clean energy choices need to be our priority.
Response: Comment acknowledged.	
Russell, Carol	We have a chance to stand up to the oil industry now and slow the dangerous expansion of oil transport. Oil companies want to expand their Northwest operations by building oil shipping terminals on Washington's coast and turning our region into a thoroughfare for crude oil transportation by rail and oil tanker. Take action now to stop two terminals proposed for Grays Harbor, Washington, and protect your community from increased crude oil rail traffic, oil spills and carbon pollution. The proposed oil shipping terminals; the explosive, dangerous oil trains needed to feed them; and the continual parade of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of communities, the local economy, tribal culture, and our ocean and coastlines at risk. This is not the future we want. A public comment period is underway right now on draft environmental reviews of the risks and harms from the proposed Westway and Imperium terminals in Grays Harbor. Let the Washington Department of Ecology and the City of Hoquiam know that we understand the risks we face with these oil industry proposals, and we don't think they're worth it. The draft environmental reviews find that the risks of oil spills during rail transport, at the terminal site, and during marine vessel transport through Grays Harbor cannot be fully mitigated, and that if a spill occurred, the environmental damage would be significant. Whether you live five or five hundred miles from Grays Harbor, the oil industry plans to bring more dangerous types of oil through the region, including volatile Bakken crude and toxic tar sands from Canada, increasing the risk of a derailment, collision, spill, fire, or explosion...putting people in your state at risk.
Response: Comment acknowledged.	
Russman, Rick	Let's do the right thing and say NO to big oil.
Response: Comment acknowledged.	
Russo, Helen	Help us now!!!!Protect us from this very present danger!
Response: Comment acknowledged.	
Rutherford, Zinn	Please stop there are way too many risks.
Response: Comment acknowledged.	
Ruthsdottir, Ann	PLEASE help save our planet.
Response: Comment acknowledged.	
Ruzek, Heidi	Please do what is right. Economics should not be part of the final decision. Our environment has to be apriority over the the wealthy's pocket books. This is exactly why the majority of educated voters have NO faith in our country or elected politicians.
Response: Comment acknowledged.	
Ryals, Jill	Stop destroying our world . We must keep the world safe for all living things . The one with the most toys really doesn't win.

Commenter Name	Comment
Response: Comment acknowledged.	
Ryan, Anne	Thank you for reading my letter.Raw materials are finite. If we seek to exploit them the majority of people in this country and other will suffer greatly. This is a moral imperative.
Response: Comment acknowledged.	
Ryan, Irma	Please do everything possible to stop crude oil transportation by rail and oil tanker. It is too risky!! Our planet needs our tender care not disregard.
Response: Comment acknowledged.	
Ryan, Mark	To whom it may concern: Please do NOT approve the proposed two terminals for oil transport at Grays Harbor, WA, a beautiful state in our Union. As it stands, our tracks are not strong enough to withstand the oil filled rail cars running across are country. The oil cars are too heavy for the speed at which the trains run, and too heavy for the quality and age of the tracks these oil cars run on. We need to first invest in better railroad transportation, such as a Bullet Train, expressly made to handle these oil car rail transportations which otherwise are de-railing and causing massive fires that last for days, even weeks. Until and unless we have the quality of transportation to safely carry these oil cars from point A to point B, please withhold your support for these two terminals and instead focus on supporting the quality of transportation such as the Bullet Trains Japan, and many of our allies in Western Europe have invested in an built to transport oil much more safely than we have on better much faster, and safer tracks transporting these oil cars much more safely and at incredible speeds. As the Bullet Trains many other first world countries have been investing in for thirty years now, it is our turn. Imagine the number of derailments and massive fires we ill no longer have all over the country. We need to catch up. We never hear about massive train car derailments, explosions and as a result all that carbon burning into the atmosphere in other countries which transport much of their oil in their country as they have invested in safer, more productive (speed) forms of transporting this oil in building Bullet Trains, which we have always been meaning to do anyway. Lets do it! Sincerely yours, Mark Ryan Orland Hills, IL
Response: Comment acknowledged.	
Ryan, Melissa	Could welfare of our planet and the people who live on it FOR ONCE come before greedy financial concerns??? Do the right thing!
Response: Comment acknowledged.	
Rybovich, Deb	Thank you for reading my letter. Too many accidents have happened this year with oil cars on trains and other shocking accidents, to include contaminating ground water. It's just not worth it.
Response: Comment acknowledged.	
Ryder, Charlotte	The Oil Companies and their owners don't care - they are only interested in making a profit- Money trumps heath issues!
Response: Comment acknowledged.	
Ryman, Julie	There have been too many spills that have contaminated land, water, and the air to think this is a safe way to transport! I think we can come up with a better solution. But there is no solution to rectify a spill once it contaminates water!
Response: Comment acknowledged.	
S, Sharon	Expanding export of fossil fuels is the last thing we should be considering in the United States of America. We must act as world leaders and stop permitting and investing in these destructive actions.
Response: Comment acknowledged.	
S, Tom	I don't like the idea of so much flammable materials being transported through Ohio. I also don't like that it continues our energy dependence on such a volatile, finite resource.
Response: Comment acknowledged.	
Saaris, Gary	Oil needs to remain in the ground for the human life to survive on this planet. I'm sorry for the losses of oil investors. But this is one aspect of the climate change that we can address.
Response: Comment acknowledged.	
Sable, Jeanne	I, like the state of NH, am serious about a sustainable energy future. Please join us.
Response: Comment acknowledged.	

Commenter Name	Comment
Saeki, Yuji	Oil is the last century. This is the age of electric. Get with the times.
Response: Comment acknowledged.	
Sager, Sharol	Our environment is precious. Take action to prevent future issues with train derailments as well as the building of terminals and other dangerous activities within our borders. Let's find a new source of energy!!!
Response: Comment acknowledged.	
Saint-marie, Mary	Be the leadership that brings only the new clean energy creations and solutions. It is time to be the leadership now. It is Time. Now is the Time.
Response: Comment acknowledged.	
Sakoi, Laura	It's dirty & expensive. We must focus our efforts on cleaner, renewable, environmentally responsible sources of energy! Enough is enough!! Thank you!
Response: Comment acknowledged.	
Sallia, Jo Anne	It's not what we want. We want to be safe in our own homes.
Response: Comment acknowledged.	
Salomon, Stanley	A recent visit to this area reinforces the need to stop the terminal from being built.
Response: Comment acknowledged.	
Salvatore, Hannah	These trains are just plain dangerous. Picture them going through your neighborhood.
Response: Comment acknowledged.	
Samora, Johanna	Please stop this!!
Response: Comment acknowledged.	
Sandage, David	Thank you for reading my letter. Let's pursue sustainable development instead of dangerous, destructive ones.
Response: Comment acknowledged.	
Sanders, Barbara	Why should we risk shipping Bakken crude and other volatile, dirty Canadian through our country and out of our ports? If Canada insists on continuing to produce such harmful products, let them bear the consequences of moving them around. The rest of us will just bear the consequences of their production...
Response: Comment acknowledged.	
Sanders, Judith	we are long past the time when we should have made a swift transition to clean energy. The longer we delay, the more the overall cost will be. Thank you for reading my letter.
Response: Comment acknowledged.	
Sanders, Julia	Please don't destroy one of our most pristine and valuable estuaries, and all its economic and ecological benefits. Many multi-generational oyster farmers live there and oil transport in Grays Harbor would be a disaster.
Response: Comment acknowledged.	
Sanders, Micki	I left Oklahoma because of big oil's abuse. I DO NOT want to see them abuse Idaho's land, air & water too!
Response: Comment acknowledged.	
Sanford, Nathaniel De'von	Thank you for reading my letter. Code Green
Response: Comment acknowledged.	
Sanger, Tanya	Thank you for reading my letter because time & energy need to be spent reducing our reliance on oil and; not expanding anything related to oil, its production or transport.
Response: Comment acknowledged.	

Commenter Name	Comment
Sannella, Dr. Frank W.	Thank you for reading my letter. For a country which is supposed to be the most advanced in the world, we sure as hell don't act like it! We DO KNOW all of the toxic effects of crude oil, including that of climate change, and yet we persist (big money's influence, of course) in subjecting our population to the diminishment of health and welfare!!
Response: Comment acknowledged.	
Santana, Audra	stop funding for dirty transportation!! Keep things clean!
Response: Comment acknowledged.	
Santana, Maria	The time has come to fully implement electric and solar power for our vehicles and energy needs and to stop poisoning our oceans and drinking water for the sake of corporate greed.
Response: Comment acknowledged.	
Santiago, Alicia	No amount of jobs is worth the continued destruction of our environment. Our children deserve a future too, which means we must move away from the polluting ways of the past.
Response: Comment acknowledged.	
Santiago, Juan	Thank you for reading my letter. Enough of oil already! When I hear the word oil I think of greed and corruption and the destruction of our eco system. Enough!
Response: Comment acknowledged.	
Sarbiewski, Stephen	Want to build something for our energy needs? Build solar panels or windmills, they don't explode or contaminate the land, sea and air.
Response: Comment acknowledged.	
Sari, Mary Elish	No one wins with oil. Bad for us, bad for the land.
Response: Comment acknowledged.	
Sarlos, Charlotte	Iwant to stop the building of the two oil shipping terminals on Washinton's coast. The Northwest should not become a dangerous thoroughfare for crude oil transportation by rail or oil tanker!This would put public health and safety at HUGE risk!! NO!! Prot
Response: Comment incomplete.	
Sartori, Eri	As we know from past experience transporting oil is destructive and significant to the land and water. Serious consideration and safeguards should be taken to eliminate oil spills and explosions. Therefore we should channel our countries efforts into renewable and safer options.
Response: Comment acknowledged.	
Sassaman, Richard	When (not if) something goes wrong, your coastline will be a) ruined for things like tourism and fishing, and b) more costly to clean -- if that's even possible -- than any money your state would have made. Not to mention the effects on climate, which you also should be considering. If you have any interest in the future, that is.
Response: Comment acknowledged.	
Savio, Mark	Help protect our precious marine habitats in the Northwest.
Response: Comment acknowledged.	
Savka, Dinmani	It is time to keep fossil fuels in the ground.
Response: Comment acknowledged.	
Sayer, Coletta	Our health and the health of our children ought not to be sacrificed for limited fossil fuels. The State of Washington has suffered enough from adrought, why risk the limited fresh water it has?
Response: Comment acknowledged.	
Sazonova, Olga	Thank you for reading my letter. I feel very strongly that we must take all possible steps to reduce our use of fossil fuels in favor of renewable energy sources that don't contribute to climate change.
Response: Comment acknowledged.	
Scalese, Steve	Get dirty oil out of our lives NOW! We don't need it!!
Response: Comment acknowledged.	
Scaltrito, Marietta	We have the responsibility to protect our world, not give in to GREED and INDIFFERENCE. Thank you for reading my letter.

Commenter Name	Comment
Response: Comment acknowledged.	
Scarpelli, Victoria	Please do not allow any expansions to happen. Oil has already caused plenty of issues, we do not need anymore.
Response: Comment acknowledged.	
Scena, Marian	The proposed oil shipping terminals; the explosive, dangerous oil trains needed to feed them; and the continual procession of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of communities, the local economy, tribal culture and our ocean and coastlines at risk. This is not the future we want!
Response: Comment acknowledged.	
Sch, Janet	Stop dirty oil! Keep Earth protected! Protect the lives of our futures. If oil trains are dangerous that makes all people including yourself in danger. Stop dirty oil and save our planet!
Response: Comment acknowledged.	
Schacht, Bruce	There are no adequate protections for the environment, for these oil trains.
Response: Comment acknowledged.	
Schaefer, Kerwin L.	I live near a RR track, so this issue is important to me. Other countries are moving quickly toward renewable and safer energy production. Why are we still clinging to the past, when we should be leading the developed world into the future?
Response: Comment acknowledged.	
Schaeffer, Kathy	As a resident of Montesano I have serious concerns about the health, environmental, social and economic impacts of oil transit and storage at the Port of Grays Harbor. The known risks related to oil-by-rail transport, tank storage, and export by vessel pose a grave threat to human health and safety. Our communities would assume the risk of oil transit and storage, while oil companies would reap the profits. The chemical fumes vented from the oil storage tanks, and released during loading and unloading of trains and tankers will impact Hoquiam, and surrounding towns affecting health and diminishing property values. Increased rail traffic would heighten pollution including diesel particulate matter, affecting our schools, parks, homes and businesses along the oil transit corridor. Exposure has been shown to result in increased risks of cancers, stroke and heart attack, asthma, allergies, chronic obstructive pulmonary disease, and neurodevelopmental and behavioral disorders in children. There is also the real potential for explosions and oil spills from train derailments which would impact community safety, and water and food security. There is no way to mitigate the risks and dangers of oil transit and these crude oil terminals, and therefore the permits should be denied.
Response: Refer to Draft EIS Section 4.7, *Impacts on Resources,* for descriptions of potential impacts that could result from the proposed action. Refer to the Master Response for Mitigation Framework.	
Schafer, Maggie	WE NEED TO STOP THIS NOW!!! FRACKING IS OUT OF CONTROL, CANADA IS OUT OF CONTROL, AND WE HAVE TO PAY FOR IT!!!!!!!!.
Response: Comment acknowledged.	
Schaffer, Elizabeth	Please help.
Response: Comment acknowledged.	
Schambach, Marilyn	It is time to take a different direction. People and the globe not money for a few.
Response: Comment acknowledged.	
Schaming, Melissa	Thank you for reading my letter. It is important to act responsibly now in order to preserve our country for future generations.
Response: Comment acknowledged.	
Schemmel, Marlene	Thank you for reading my letter.Please STOP transferring OIL thru our country. It is very dangerous to people and the planet!
Response: Comment acknowledged.	
Schepps, Berdalee	we are dancing on the brink of environmental disaster and yet big oil will not change it's ways until it has squeezed the last penny out of an untenable and finite resource. IS ANYBODY LISTENING?!

Commenter Name	Comment
Response: Comment acknowledged.	
Scherer, Josephine	We have already seen enough devastation caused by oil train derailments and other petroleum transport mishaps. Let's not add more fuel to the fire (LITERALLY)!
Response: Comment acknowledged.	
Schihl, Ms. Michal	It's called CRUDE for so many REASONS!!! This is NOT the future we want.
Response: Comment acknowledged.	
Schiller, Marlene	Stop the transportation of crude oil across the USA. There is too much potential for that to be dangerous to our people and our environment. Thank you for reading my letter.
Response: Comment acknowledged.	
Schilling, Francis	I live one-half mile above the beautiful riparian wetland of the Cienega Creek Natural Preserve. Permanent water flowing in a desert wracked by fifteen straight years of drought. We cannot even get the twelve inches of rain that used to be considered normal here and what runs mere tens of feet of above that miraculous place and upwind from my house? Literally dozens of Union Pacific freight trains per day(!) and many of them loaded with petroleum and petroleum distillates that could destroy that beautiful Preserve and my home in an instant. I am sickened by our country's failure to address its infrastructure and regulatory issues in deference to these giant oil monoliths and their sacred bottom lines. Adding these terminals exacerbates the potential horror by orders of magnitude and will expose untold numbers of Americans to increased risk from spills, derailments and explosive incidents. I know this for certain: every time we as a nation allow self-interested entities to influence public regulatory policy, we as a nation are harmed. I want my government to start fulfilling its regulatory responsibilities to its people and STOP acting as a rubber stamp for corporations intent on enriching themselves at any cost. These terminals have no place in a country that protects its citizens and its natural environment! Thank you for reading my letter.
Response: Comment acknowledged.	
Schmall, Eric	There is no amount of compensation that can make taking a chance of an accident worthwhile.
Response: Comment acknowledged.	
Schmidt, Jason	Thank you for reading my letter. We should look to the disasters in the past to make a common sense decision. NO PIPELINES!
Response: Comment acknowledged.	
Schmidt, Kris	Clean, renewable sources please
Response: Comment acknowledged.	
Schmidt, Liz	Our children deserve better.
Response: Comment acknowledged.	
Schmidt, Martin	We should spend no more money on fossil fuel infrastructure - we need to leave fossil fuels in the ground and change to renewables. Thank you for reading my letter.
Response: Comment acknowledged.	
Schmidt, Misty	We all know that oil is bad for our health, collecting it, processing it, shipping it. We all know there are better ways to get power and energy. Ways that support the environment. Until they stop making billions killing the planet they'll never stop. We need to start making it worth more to use replenishable sources not just tring to stop destruction when it rears up.
Response: Comment acknowledged.	
Schmitt, N	support renewable energy.
Response: Comment acknowledged.	
Schneggenburger, Joan	All it takes is one catastrophe!
Response: Comment acknowledged.	
Schneider, Carol	We are cutting way back on the use of oil. We should not be subjected to its transport either.
Response: Comment acknowledged.	

Commenter Name	Comment
Schneider, Daphne	We need to be putting our efforts into alternative sources of energy, not making things easier for the oil industry.
Response: Comment acknowledged.	
Schneider, Linda	11/06, President Obama decided against the Keystone XL Pipeline, but it does no good to say "no" to tar sands if we are going to continue to expand potentially dangerous rail transport of oil. We should be decreasing these shipments by rail, or imposing stringent safety standards on them. More terminals and more rail transport do not make sense in terms of the potential safety hazards. At a time when oil and gasoline prices are dropping, I don't think we need to be expanding our con sumption and use of this fossil fuel.
Response: Comment acknowledged.	
Schneider, Sheila	Crude oil rail traffic, oil spills and carbon pollution are bad news for the environment and our citizens. Now is the time to stop the oil companies from polluting our country. Thank you for listening.
Response: Comment acknowledged.	
Schock, Katherine	We don't need any more pollution, we already have enough to kill us!
Response: Comment acknowledged.	
Scholes, Delia	These oil industry proposals are taking us entirely down the wrong road. Not just environmentally--and with risks that cannot be justified--but also financially. This industry has already demonstrated it has no concern for safety in the transporting process.
Response: Comment acknowledged.	
Scholl, Jackson	Corporate oil companies have no business in participating in the Paris Global Climate Talks!!
Response: Comment acknowledged.	
Schonfeld, Michelle	We have already had enough crude oil accidents.. Don't allow crude-by-rail.
Response: Comment acknowledged.	
Schoonover, Katherine	We need to direct our resources to sustainable energy development that reduces our dependency on fossil fuels. We should not be building additional infrastructure to serve the fossil fuel industry.
Response: Comment acknowledged.	
Schreiber, Natalie	Thank you for reading my letter. Stop putting profits before lives just so a handful of billionaires can make more money. Keep the tar sands in the ground!
Response: Comment acknowledged.	
Schroeder, Clara	All of Creation is entitled to clear air. This will not be so if the crude oil transport is not stopped IMMEDIATELY. Thankyou!
Response: Comment acknowledged.	
Schroeder, James	Putting Republicans in office will guarantee the oil transportation across our country.
Response: Comment acknowledged.	
Schroeder, Marlene	Thank you for reading my letter. Don't risk despoiling the beautiful Washington coast.
Response: Comment acknowledged.	
Schryba, Paul	We must not mindlessly push economic development at the expense of the environment that sustains us.
Response: Comment acknowledged.	
Schuch, Janice	Please protect our shell fish,salmon and marine life that so depends on clean water. Because we all know that accidents happen and our resources get destroyed so that Dakotas, Wyoming & Montana can profit from sending American resources to China.
Response: Comment acknowledged.	

Commenter Name	Comment
Schulman, Jason	I very much appreciate your time and attention.
Response: Comment acknowledged.	
Schultz, Gordon	Anyone who cares about the well-being of our children will not allow the continuation of the use of fossil fuels. This is not debatable. The evidence is all there. Thanks
Response: Comment acknowledged.	
Schultz, Nancy	I have spent years in the area proposed. I know how devestating a spill would be to the ecosystem,especially the tidal basin. The area could never recover. The huge migratory and resident bird populations would be profoundly and negatively affected .
Response: See Response to FL1-1.	
Schultz, Peter	Rejecting these terminals will help keep the coast and harbors clean.
Response: Comment acknowledged.	
Schultz, Stephanie	We are a very congested state with towns close to railroad tracks and in imminent peril with potential accidents with oil trains. Do not expand the threat!
Response: Comment acknowledged.	
Schultz, WM	Even though I live in Montana, the oil trains come through my town on the way to the pacific coast. We don't want any MORE spills.
Response: Comment acknowledged.	
Schunck, Toby	Thank you for reading my letter. I do not want to see this planet burn up.
Response: Comment acknowledged.	
Schwab, Natalie	Sustainable energy is the only thing we should be using. F--- the oil industry
Response: Comment acknowledged.	
Schwaller, Greg And Laurie	Thank you. We are counting on you.
Response: Comment acknowledged.	
Schwartz, Leslie	This is a very important issue for me!
Response: Comment acknowledged.	
Schweitzer, A.	We need to make a change, NOW, to protect our precious planet.
Response: Comment acknowledged.	
Schwyhart, Philip	No more dirty energy. Time to enter the 21st century!
Response: Comment acknowledged.	
Sciandra, Eva	Washington's beautiful coastline is a unique treasure. We have a duty to preserve it for our children and grandchildren.
Response: Comment acknowledged.	
Score, Tara	We can be clean, clean energy MUST be our priority - wind, solar, hydro- enough with the selfish greed- this is about the future generations.
Response: Comment acknowledged.	
Scott, Edd	I live in a floating home aka Houseboat on Multnomah Channel in Portland Oregon that is in a moorage very close below a railroad that carries a huge amount of crude oil. With the number of problems oil trains have had nationally we live in constant fear
Response: Comment acknowledged.	
Scott, Jack	Well, you're blowing it again! Or, more.....yes, it's just about over due to ocean acidification from CO2. And you're doing more, worse. Well, expect "worse, sooner", the human race will die soon, due to your oil ports!
Response: Comment acknowledged.	

Commenter Name	Comment
Scott, Kathryn	Please listen to one area resident: turning this area into oil use promotion, is not a value creation choice. Do Not Do It! Kathryn Scott
Response: Comment acknowledged.	
Scoville, Janine	Terminate our dependence on oil. Period. And stop fostering production for export.
Response: Comment acknowledged.	
Seaman, Carol	The current DEIS for westway & imperium crude oil terminal proposals is woefully inadequate and seriously inadequate. The many extreme dangers presented in this oil plan puts us and all we here in Grays Harbor. 31% of the economy here is directly related to our marine resources. Seepage of oil and a disaster will happen -destroying our estuary because this crude oil cannot be boomed. It sinks to the bott and will impact all animal, fish & Han life. You been to go back to the drawing board and say no! You cannot mitigate disaster with money thrown at a task that is not doable. High winds, high tides information is incorrect, as well as failing to address the impact on disaster which a 450% increase in harbor vessel traffic will have. Barge collisions increase greatly. As the barge collisions in Galveston Texas showed last year--we are in grave danger of this. Who will pay for the damages to fisherman and business when Grays Harbor is closed?
Response: Comment acknowledged.	
Seaton, Lenora	Thank you for reading my letter. Wow, like we need more targets for Isis. We need to re-educate ourselves on how to protect what we already have. Do the right thing and keep it moving.
Response: Comment acknowledged.	
Seeburger, John	.Dear Ecology and Hoquiam: The DEISs for Westway and Imperium show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and could cause significant environmental damage. These proposals simply offer too much risk and too little reward. Grays Harbor communities would take on the risk and oil companies would reap the profits, while Grays Harbor would become a throughway for oil headed elsewhere. Much of what makes Grays Harbor special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters. The alarming safety record of oil trains means an explosive oil train derailment is not a question of if, but when. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line, from Aberdeen to Chehalis and all the way to the source of the oil in North Dakota and Canada. There are better way to meet our energy needs. Washington State is rapidly moving away from fossil fuels and toward clean, renewable sources to meet our energy needs and respond to global warming. Building more big infrastructure projects to transport yesterday's energy sources is the wrong way to meet today's energy needs, and it's a big environmental and economic gamble for Grays Harbor. Washington State should continue to lead on safe, renewable clean energy solutions and say no to more oil and coal. I support protection of Grays Harbor and its people, and urge you to reject the proposed oil terminals.
Response: Comment acknowledged.	
Seegert, Frances	The main rail line goes by our property just 1/10 of a mile away. We see oil bomb trains going by with greater frequency. Black tanker cars by the dozens all strung together. Amtrak uses the same line, there is a pull off siding there, for trains to bypas
Response: Comment acknowledged.	
Seeves, Jerry	We're slowly but surely destroying our planet.
Response: Comment acknowledged.	
Seibold, Carolyn	Thank you for reading my letter. The oil companies and their business risks have been subsidized for too long. They don't clean up after themselves; they've been free to destroy our environment.
Response: Comment acknowledged.	
Seil, Charles	Environment over jobs. We can't handle any kind of disaster in our state of the possible magnitude of oil trains.
Response: Comment acknowledged.	

Commenter Name	Comment
Selander, Spencer	My entire town is endangered by trains carrying flammable cargo, vastly increasing the number of such trains is a terrible idea.
Response: Comment acknowledged.	
Sellars, Stefanie	Time to get off oil and release the technologies sequestered in black projects, the ZPM modules. Our Earth can no longer handle the lies that we don't have it. We do! What kind of catastrophe is it going to take to develop the Zero Point Energy Modules for commercial use? I know our government has them, I've seen them.
Response: Comment acknowledged.	
Sellers, Robert Dale	These rail lines are accidents waiting to happen. Accidents are up with the transport of oil causing more stress to the tracks, which apparently can't handle it. Even the lamestream press is reporting this! I'd have no problem with this issue if accidents didn't happen. Thank you for considering my thoughts.
Response: Comment acknowledged.	
Seltzer, Elizabeth	Stop destroying our planet.
Response: Comment acknowledged.	
Sentesy, Mark	According to Forbes, oil kills 36,000 people per TKwh of energy generated. We should oppose forms of energy that kill people. In addition, I have a 6 month old son, who will see global temperatures rise by 7-10 degrees F in his lifetime, unless we drastically reduce our greenhouse gas emissions.
Response: Comment acknowledged.	
Sentovich, Barbara	It is an important area for birds and a spill would be devasting to them.
Response: Comment acknowledged.	
Serna, Russella	I don't want oil companies to transport oil anywhere near people. The next thing that this will bring about is another oil spill on LAND. We have a right to protect ourselves.
Response: Comment acknowledged.	
Sernaker, Aviva	Grays Harbor, WA is on the beautiful coast of the Olympic Peninsula; please don't change it to a smelly port!
Response: Comment acknowledged.	
Serrano, Ileana	Nature can only take so much abuse and now we plan to put at at a higher risk with the oil venture? Let me knot n=mention the effect on human lives.....We cannot allow this to continue just foe $$$ sake!
Response: Comment acknowledged.	
Seuferer, Shawn	Please protect the environment for future generations and wildlife. You only get one chance to save them before they are gone.
Response: Comment acknowledged.	
Sevald, Diane	Why spend all the $ on a 20th century fuel source & risk catastrophic damage to the planet? It's past time to move on to sustainable energy. Thank you for reading my letter.
Response: Comment acknowledged.	
Sexton, Lorraine	When first hearing about these dangerous; potentially explosive oil trains moving pitiful Bakken crude & oil sands via oil trains throughout communities, I was appalled. How can our country justify such, especially in the N.W. & the West? With climate change, our States are already at great risk of devastating wild fires & oil trains pose an even greater threat to these fragile areas. Most of us understand that we need to PROTECT our environment & keep moving forward to renewable energy sources & not rely on oil.
Response: Comment acknowledged.	
Sexton, Nicholas	NO more oil and gas! We have solar power, wind power, and soon we will have Thorium power (which is a clean form of atomic energy). The time for debate about about climate change is OVER. We need to build these new sources and put oil in the museum where it now belongs. We also have ELECTRIC CARS, there is no need to keep pumping oil!

Commenter Name	Comment
Response: Comment acknowledged.	
Seyer, Sheryl	Please make decisions that support renewal energy sources rather than dirty fossil fuels! I live in a state with ugly remains from surface mining of coal. Thank you!
Response: Comment acknowledged.	
Shablow, Janette	abuse creates more abuse
Response: Comment acknowledged.	
Shafer, Stephen	Leave it in the ground
Response: Comment acknowledged.	
Shaffer, Ann	Please, leave fossil fuels in the ground and move on to clean energy. Thank you.
Response: Comment acknowledged.	
Shaffer, Suzanne	Wind turbines and solar panels don't pollute or explode.
Response: Comment acknowledged.	
Shanley, Paul	We can't let foreign countries dictate economic policy thru international corporations and our corrupt politicians.
Response: Comment acknowledged.	
Shappell, Larry	All attention and government money should be focused on building a renewable infrastructure.
Response: Comment acknowledged.	
Sharp, Louise	Protect USA citizens from further dangers of risks of contamination and possible destruction of waters, property, persons living in the proposed Washington state oil transport and export terminals corridor currently proposed by the oil industry. Solar and alternative energies (and lubricants, etc.) are increasingly safer and becoming more available for home, business, industry. Protect our health and welfare by stopping these oil industry proposed transportation projects now. Thank you for hearing my words. Louise Sharp
Response: Comment acknowledged.	
Sharpe, Chip	Grays Harbor may seem like one small spot on our grand Earth, but it is very significant. Listen to the Lummi Nation. Traditional understanding of our interlinked kinship with land, sea, and other creatures gives us the power to build a hopeful future.
Response: Comment acknowledged.	
Sharrett, Lucas	America can not rely on energy made from the past to lead its future. We need to focus our efforts on clean renewable energy to guide us forward.
Response: Comment acknowledged.	
Shaw, Carolyn	Keep fossil fuels in the ground where they belong, protecting our health and safety at the same time.
Response: Comment acknowledged.	
Shaw, Jeanne	What will it take to make the people understand we are killing our planet and ourselves with all this oil. Think about your children and grandkids.
Response: Comment acknowledged.	
Shaw, Jessie	....and no more fracked gas infrastructure, either. Can't we please get serious about developing alternative energy? And stop doing stupid stuff with the fossil fuel we are using? Like, why ship apples from WA to VA when we grow apples here???
Response: Comment acknowledged.	
Shaw, Susan	Having lived in Washington, I know what a beautiful state it is and I want to protect that beauty.
Response: Comment acknowledged.	
Sheaffer, Wanda	There are better ways to meet our country's energy needs. The transportation of oil is just too risky due to oil spills and all the traffic it creates.
Response: Comment acknowledged.	

Commenter Name	Comment
Sheardy, Robert	Stop the two terminals proposed for Grays Harbor, Washington.
Response: Comment acknowledged.	
Shearer, Allison	This is a bad idea for the people of Washington. Please don't put in the 2 terminals for Grays Harbor. The health and safety issues are enormous. Let's protect our state and the people and sea life that live in it. Just say NO!
Response: Comment acknowledged.	
Shearer, Ruth W.	Even if it was safe, our railroads can't handle all that oil to feed the oil terminals and still get our Eastern Washington crops shipped in a timely manner. They are far more important than moving oil which should be left in the ground.
Response: Comment acknowledged.	
Sheinson, Ronald	Exporting crude oil in no way contributes to making our country less subject to energy blackmail by producing states, nor contributes to energy independence. It makes profits to specific companies at the expense of our healthy environment and citizen viability.
Response: Comment acknowledged.	
Shelburne, G B	This is very important to me.
Response: Comment acknowledged.	
Shelton, David & Carol	We have to be very careful about how we transport this dangerous toxic flammable substance. At this point, such care is not being implemented. Since human health and the environment could be seriously compromised, please take this issue seriously and do something to enhance safety.
Response: Comment acknowledged.	
Shelton, Herb	Carbon heavy toxins need to stay in the ground!
Response: Comment acknowledged.	
Shelton, Olivia	Thank you for reading my letter. The trains' inevitable explosions and leaks should not impact any community, farm, forest or waterway. We can't clean up the disasters we already have created...there needn't be more. Fossil Industry driving community destinies and everyone's health cannot be empowered.
Response: Comment acknowledged.	
Shepherd, Jim	No oil exports. We get pollution so big oil can get more profits they don't need or deserve. Thank you for reading my letter.
Response: Comment acknowledged.	
Sherman, Ruth	Don't we connect the dots? Haven't we had enough of oil spills that contaminate our water, our environment and endanger our lives?
Response: Comment acknowledged.	
Sherman, Tom	Thank you for reading my letter smaller cars and busses not more oil. Less frivolous trips
Response: Comment acknowledged.	
Shermock, Margaret	Greed & over population are ruining our natural resources. Once they are gone, that's it. The greedy oil industry is sick, dangerous & needs to be stopped NOW. The Northwest is a beautiful area, it needs to stay that way, OIL TANKER free. Then they'll try to sneak in fracking, another dirty, detrimental activity. Stop all now, before it is too late.
Response: Comment acknowledged.	
Sherwood, Sarah	Please wake up! We need you to do the right thing....
Response: Comment acknowledged.	
Shewell, Jay	Building new infrastructure to transport yesterday's energy sources to overseas markets for short-term profits of Big Oil, at the immense long-term expense of public health, the environment and numerous local communities, could not possibly be further in the WRONG direction.
Response: Comment acknowledged.	
Shields, Janice	This is a disaster waiting to happen.

Commenter Name	Comment
Response: Comment acknowledged.	
Shields, Susan	The hazards are unacceptable.
Response: Comment acknowledged.	
Shimeall, Nancy	Please stop this dangerous expansion of oil in our precious community!
Response: Comment acknowledged.	
Shiner, Cathy	The odds are that never happen no longer appear to apply. It is more likely that the odds are IT WILL HAPPEN! I live in NE Pennsylvania with the remnants of the steel and coal industries, it has affected the water, the air, the land, and the health of people and wildlife. Seems we can destroy the environment but not restore it. Please consider all the risk both short and long term. Thank- you
Response: Comment acknowledged.	
Shipman, Mark	We must make our current infrastructure more efficient and not build new ones for the sake of preservation.
Response: Comment acknowledged.	
Shippen, Sallie	Oil by rail goes right through my city as well, and I am very concerned about safety and damage to our environment.
Response: Comment acknowledged.	
Shipston, Dick	On a recent trip I was fortunate to camp next to the Hoquiam River and enjoy the southern Olympic National Park area. It would be a disaster to allow the possibility of a spill just to furnish a passageway for big oil. I don't see any long term benefit to the area just to allow large companies from using any area as a conduit for huge profits to be exported elsewhere. Immediate gratification is no substitute for a sustainable future!
Response: Comment acknowledged.	
Shock, Janet	Please ensure a bright future for the human race and all earthlings by stopping increased crude oil rail traffic, oil spills, and carbon pollution!!
Response: Comment acknowledged.	
Shoenfeld, Sharon	This is poison all the way. Please stop it now and protect our country. Thank you for reading my letter.
Response: Comment acknowledged.	
Shook, Emma	No Oil Export Terminals!!!!!
Response: Comment acknowledged.	
Shope, Gary	STOP OUR COUNTRY FROM BEING TURNED INTO A THOROUGHFARE FOR CRUDE OIL TRANSPORT!.
Response: Comment acknowledged.	
Shovein, Karen	We need to take our country back from giant corporations and try to serve safely the citizens.
Response: Comment acknowledged.	
Shramick, Rose Marie	We need to have our environment safe for all of us including for future generations. This is vital. Thank you.
Response: Comment acknowledged.	
Shumate, Gayle	An accident is inevitable & the environment and our air and water resources must be protected along with the health and safety of people.
Response: Comment acknowledged.	
Sibon, MD	Please prevent future disasters!!
Response: Comment acknowledged.	
Sidofsky, Carol	1) The filthy tar sands Canadian Keystone pipeline may not be "dead". Don't let it get "revived" by the next president!!! 2) Ban fracking NOW!
Response: Comment acknowledged.	

Commenter Name	Comment
Siederbaum, Harvey	At a time when we must move away from fossil fuels, I stand with massive numbers of concerned citizens in opposition to the two proposed oil shipping terminals on Washington's coast, and urge the dissolution of this wrongheaded plan.
Response: Comment acknowledged.	
Siegel, Mel	Rail transport of crude oil is about as bad an idea as I can imagine, especially since in addition to the hazard it creates, its magnitude is weakening our already weak passenger rail transportation system.
Response: Comment acknowledged.	
Siens, Susan	Too many reasons toKEEP IT IN THE GROUND!
Response: Comment acknowledged.	
Sigler, J	Thank you for reading my letter. Keep our land clean and safe. It costs less to do the right thing from the start. We have seen and we can learn from others who have not understood how precious clean healthy soil is. As a nation let us use wisdom and avoid this transport of crude trap.
Response: Comment acknowledged.	
Sikes, Lewis	We should not destroy another bay to expand oil production. Think of all the damage a Exon type spill would do the fisheries.
Response: Comment acknowledged.	
Silk, John	Fossil fuels need to be keep in the ground. Instead of investing money building these facilities that money should be invested in Green renewable energy such as Solar, Wind and Geo-thermal. The goal should be complete energy independence from Carbon based energy by 2050. We put men on the moon in a less than ten year time frame. We can do this!
Response: Comment acknowledged.	
Silleck, Bob	Why don't we take a step in moving AWAY from fossil fuels by NOT building an export terminal on our coast?
Response: Comment acknowledged.	
Sills, Carol	I have been thinking about your community and how you will say no to oil traffic. Thank you for reading my letter.
Response: Comment acknowledged.	
Silvers, Margaret	Thank you for reading my letter and taking my concerns into consideration.
Response: Comment acknowledged.	
Silversmith, Linda	We should be reducing fossil fuel use - not encouraging its spread!
Response: Comment acknowledged.	
Simko, Amanda	There should be NO transporting of this killer oil by any means. people need to scream more of the unholy devastation of our earth to get this dirty killer oil. Save our earth and our air. AND US!
Response: Comment acknowledged.	
Simmons, Andrea	Please stop the two terminals proposed for Grays harbor WA and protect the community from oil rail traffic, oil spills, and carbon pollution
Response: Comment acknowledged.	
Simon, David	Betting the community's future on oil is entirely shortsighted.
Response: Comment acknowledged.	
Simon, Susanne	Once again corporate greed takes over.stop being irresponsible and shw respect gor the land and people
Response: Comment acknowledged.	
Simonich, Claire	Enough. Keep dirty energy in the ground and switch to solar and wind energy.
Response: Comment acknowledged.	

Commenter Name	Comment
Simons, Judy	Oil should be left in the ground anyway. This dangerous, dirty and destructive project must not be allowed to go forward!
Response: Comment acknowledged.	
Simpson Sr., Eric	Help.
Response: Comment acknowledged.	
Simpson, Dean	Just as the monied tobacco interests sought to discredit the link between smoking and cancer (though they were well aware of it) so monied oil interests contine to try to suppress the known link between fossil fuels and climate change. There is something criminal going on! Please stop the expansion of toxic fossil fuel use!
Response: Comment acknowledged.	
Simpson, Dennis	Oil is a sunset industry. Stop it completely now.
Response: Comment acknowledged.	
Simpson, Penny	Maybe VA is not one of the main thoroughfares for these oil pipelines, but anywhere USA could be hit by oil spills; more safeguards need to be in place and less dependence on crude oil too.
Response: Comment acknowledged.	
Sims, Layne	Please do not allow mass oil transport in Ohio until the safety of the train cars transporting the oil has been verified. Entire communities have been wiped off the map because of the explosions that can happen, so please take this seriously.
Response: Comment acknowledged.	
Sinclair, Melanie	It's time for our country to turn away from the dinosaur technology of oil and move forward into the 21st century. Both the production and transport of oil have caused many environmental disasters. Continuing to turn a blind eye to this fact is immoral and a danger to us all.
Response: Comment acknowledged.	
Sinn, Donna	Let's not invest on those indistries that pollute and contaminate our environment and enrich a few greedy people.
Response: Comment acknowledged.	
Sinnett, Carol	Protect our waters!!!!!! Find more "green ways" to fuel our country.
Response: Comment acknowledged.	
Sinor, Madeleine	Protect America our children communities and land Cease and desist with this oil transportation for other countries
Response: Comment acknowledged.	
Sisto, Dominick	stop this is our childrens world your screwing up
Response: Comment acknowledged.	
Sitterer, Andy	Thank you for reading my letter. Please be sure to make safety against spills a priority. It may be expensive up front put less costly then a clean up.
Response: Comment acknowledged.	
Skinner, Mark	Washington is perceived as an environmentally sane state by many. Please don't ruin the illusion! Stop the terminals!
Response: Comment acknowledged.	
Skinner-brassard, Gail	Please reject these oil shipping terminals.
Response: Comment acknowledged.	
Slate, Robin	All we hear about is how we have to drill in the Artic and other pristine places so that we can end our foreign dependency on oil. In reality, they are destroying our country and the exporting the oil for even more profit. As long as the corporations are making money it is all okay right?
Response: Comment acknowledged.	

Commenter Name	Comment
Slezak Fritz, Joan	People have lives that cannot be disrupted for the wealth of corporations. That this would be considered is outrageous and demonstrates the indifference that this country has for its citizens.
Response: Comment acknowledged.	
Slife, Patricia	It is way past due to get the world to realize what this practice is doing to our environment. Please start the ball rolling!
Response: Comment acknowledged.	
Sloan, Cheryl	Leave oil in the ground. I am sick of the mess it makes. We should be following Germanys lead and pushing solar.
Response: Comment acknowledged.	
Slotnick, Lauryn	We need to support and encourage a clean, renewable energy system for our country, NOT continue to spoil our last wild places for dirty fossil fuels, much less to export these to other countries.
Response: Comment acknowledged.	
Slovak, John	This is scary...
Response: Comment acknowledged.	
Slover, Catharine	Don't tempt disaster.
Response: Comment acknowledged.	
Slyfield, Judy	The waters off the Pacific coast are having difficulties already with oxygen/temp changes, and the rail system does not have the finances to implement all the safety changes needed-and still we will have accidents-and only ONE ACCIDENT WILL BE DISASTROUS!
Response: Comment acknowledged.	
Small, Anne	We do not need to possibly destroy more irreplaceable land by hauling dirty oil over it.
Response: Comment acknowledged.	
Smile, Serenity	The risk from this kind of "dirty" energy is unacceptable to people's and the environment's health.
Response: Comment acknowledged.	
Smiley, James	Thank you for reading my letter. This letter sums the argument far better than I ever could. All I can add is All these concerns are our children's concerns. I don't sign this petition so much for myself, I have lived more than I will live, but for them.
Response: Comment acknowledged.	
Smith, C.T.	I do not want to live and work in a polluted and hazardous environment. I want to live in the Pacific Northwest but not as it is envisioned by the oil industry. Please stop them.
Response: Comment acknowledged.	
Smith, Carolyn	We do not need anymore oil spills, anywhere! Thank you for reading my letter.
Response: Comment acknowledged.	
Smith, Dan	This is not the future we want!
Response: Comment acknowledged.	
Smith, Deidra	End the droughts, fires and floods.
Response: Comment acknowledged.	
Smith, Dennann	Please stop and end dangerous oil transport expansion.
Response: Comment acknowledged.	
Smith, Gregory	Please think of our citizens, our children, and our grandchildren.
Response: Comment acknowledged.	
Smith, Hazen	I'm a commercial fishermen and I don't want to see more oil tankers at the cherry point refinery. The fishing industry does not need another set back from man,nature will take care of that. I just want to help prolong the disaster that is inevitable.
Response: Comment acknowledged.	

Commenter Name	Comment
Smith, Jennifer	I was born here and want to raise my children in a clean North West environment with no oil terminals for the risk is to great.
Response: Comment acknowledged.	
Smith, Judith	WE DO NOT WANT TO BECOME A CESSPOOL FOR THE WORLD. IF YOU ALLOW TRANSPORT BY RAIL FOR CRUDE BAKKEN, AND TOXIC TAR SANDS THROUGH ANYWHERE IN THE US, YOU ARE INSURING SIGNIFICANT ENVIRONMENTAL DISASTER.
Response: Comment acknowledged.	
Smith, Katherine & Thomas	We lived and worked in Prince William Sound during the Exxon-Valdez spill. It was horrific and the environmental and economic consequences persist. Nothing is worth the risk of a repeat, nothing. Please avoid the folly of welcoming these industries in the PNW.
Response: Comment acknowledged.	
Smith, Kathleen	Please stop the expansion of crude oil transport in order to preserve the environment and our health.
Response: Comment acknowledged.	
Smith, Kathy	No dirty oil please!
Response: Comment acknowledged.	
Smith, Kent	Please, let's not do this!
Response: Comment acknowledged.	
Smith, Linda	We must take a leadership position in moving AWAY from the dependence on fossil fuels both as an energy source and as an economic driver. There will only be a future if sustainable energy sources take the place of fossil fuels.
Response: Comment acknowledged.	
Smith, Marny	We need to tamp down the oil industry and encourage renewable clean energy if we are going to slow climate change. No more favoritism for petroleum!!!
Response: Comment acknowledged.	
Smith, Mary	I feel that the current oil rail cars are not safe traveling to and from oil fields. Oil barges could cause pollution and endanger our health.
Response: Comment acknowledged.	
Smith, Maureen	The potential for crude oil spills as have occurred in the past (Exxon Valdez, Lake Megantic, Nestucca barge spill off Grays Harbor in 1988) is an unacceptable risk to a harbor known for stopovers by thousands of migrating shorebirds and a destination for tourists that sustain the local economies.
Response: Comment acknowledged.	
Smith, Nancy	Don't do it!!!
Response: Comment acknowledged.	
Smith, Patricia	Thank you for reading my letter. It is time to secure our future by investing in renewable energy and turning away from dirty fossil fuels.
Response: Comment acknowledged.	
Smith, Patricia	The time is now to assume leadership for a cleaner world for all of us! Thank you for reading my letter.
Response: Comment acknowledged.	
Smith, Peter	We need to leave all the rest of the oil say in the ground, NOT transport it all over the world.
Response: Comment acknowledged.	
Smith, Raymond	We live in the great Northwest for a reason. That reason is to live where there is plenty of fresh air, trees, clean water and beaches for us and our children. Oil is an enemy to a clean environment and is not wanted nor needed in any of the great North West!
Response: Comment acknowledged.	

Commenter Name	Comment
Smith, Sandra	We know now that continuing to burn fossil fuels will render our planet uninhabitable. Even though we're not burning them ourselves, the Grays Harbor terminals would facilitate this destruction. Additionally,transport of these volatile fuels through our state put our safety and the health of our environment at terrible risk. Please don't make our rail system a greater hazard to our communities, our environment, and our marine habitats.
Response: Comment acknowledged.	
Smith, Shirley	Let Canada send the pipe line west or east in their own country this way they can deal with the spills that are sure to come. We don't want oil pipe lines running through our states!!!
Response: Comment acknowledged.	
Smith, Terrence	Actions like this only destroy small town America - please stand up against corporations - of, for and by the people.
Response: Comment acknowledged.	
Smith, Vicki	JAMOT...Just A Matter of Time...until another train spills, burns and destroys. It is wrong to send the particularly harsh and explosive rail cars through cities, by schools. JAMOT until we have a 'Montreal' here in America. And the awful oil needs to be left in the ground because this is worse than most for raising global temps both in the extraction, the moving and in use. We have to stop pretending we can continue to turn up the heat and have no consequences !
Response: Comment acknowledged.	
Smith-miller, Teresa	Please do the right thing. Thanks, Teresa
Response: Refer to the Master Response for Purpose and Focus of EIS.	
Smiths, Greg	We pay a terrible price for every hydrocarbon molecule extracted in America. Consider Valdez, the Gulf, the lovely hollers of Pennsylvania and southern Ohio befouled by brine pits, eastern Colorado and California thirsting as the frackers take their water and ruin it. The oil and gas industry, as they go from boom to bust, ruining communities and lives, tell us this is all for our security. We won't have to fight wars to keep our oil and gas flowing. And now they want to ruin our coasts to send these hard-earned chemicals overseas? I don't think so.
Response: Refer to the Master Response for Purpose and Focus of EIS.	
Smothers, Marian	Keep our environment safe! No expansion of oil transport in the Northwest !Stop the oil trains all over the US. Increase wind and solar energy resources all over the US
Response: Comment acknowledged.	
Smyth, Douglas	Thank you for reading my letter. I don't want to see more and more oil bomb trains criss-crossing the country. We need more solar farms not oil export terminals.
Response: Comment acknowledged.	
Snell, Helene	This is so important!
Response: Comment acknowledged.	
Snider, Rhonda	Thank you for reading my letter. I pray you hear what we are saying. God Bless, Rhonda Snider
Response: Comment acknowledged.	
Snow, Blaine	My father and grandfather both grew up in Grays Harbor, on Chenault Ave. in Hoquiam, and both of them would not want their community endangered by oil and coal transport.
Response: Comment acknowledged.	
Snyder, Eleanor	Until all tracks and tanker cars are safe, and up-to date none of these dangerous things should be allowed on trains.
Response: Comment acknowledged.	
Sobel, Scott	19th century solutions cannot be applied to 21st century problems. Oil and other fossil fuels will destroy us. We need to get off fossil fuels immediately if we are to survive as a species. We ignored the warnings for way too many decades to allow for a slow gradual transition. Now, we're in crisis. Oil is unsafe at any speed and by any transportation mechanism. Now is the time to get off it.
Response: Comment acknowledged.	

Commenter Name	Comment
Sochacki, Marcia	Please say NO to the proposed oil shipping terminals on Washington's coast. Please say No to any and all proposed oil shipping on American lands.
Response: Comment acknowledged.	
Sodt, Peter	Areas close to large bodies of water are at special risk.
Response: Comment acknowledged.	
Solari, Jimmey	Thank you for reading my letter. Crude oil is poisonous,useless sludge, Today's technologies surpass this crude oil refinery action in the 10's of thousands of times greater. Please Stop the crude oil usage all together.
Response: Comment acknowledged.	
Soldal, Jesse	we do not want to increase risks with oil
Response: Comment acknowledged.	
Solin, Meredith	Please don't risk the environment and our communities with backwards oil industry.
Response: Comment acknowledged.	
Solis, Sergio	The only ones truly benefiting from fossil fuels are the few, greedy, rich. It is about time that we stand up to them. Furthermore, all verses in the Holy Bible are against any individual becoming rich. God bless!
Response: Comment acknowledged.	
Solso, Hillary	Oil is a limited, dirty, dangerous resource that we need to start using our more abundant, clean energies. Please let's not keep destroying our beautiful planet and use the resources that are in harmony with living on Earth!!! Thank you!!!
Response: Comment acknowledged.	
Somdecerff, John	This crude oil export terminal would do very little to help Washington, but brings with it great risks. The profits of a few rich oil men should not overrule the safety of citizens. Although I don't currently live in Washington I am a big fan of Seattle. As an engineer seeking employment in the green building industry I may be living there soon. Please make your decision based on what is the best for the people and future generations. Thank you.
Response: Comment acknowledged.	
Sommerfeld, Barb	The majority of Americans do not want any more pollution. We cannot afford it. Canada should find another way to make money.
Response: Comment acknowledged.	
Sonin, John S.	Live all that fossilized crap in the ground and out of our terrain!
Response: Comment acknowledged.	
Sonnenschein, Dana	Thank you for reading my letter. I am writing because I think we need to protect our fragile coastal environments from the risks of inevitable future oil spills.
Response: Comment acknowledged.	
Sorensen, Marielle	Dear Ecology and Hoquiam, The DEISs for Westway and Imperium show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and could cause significant environmental damage.
Response: Comment acknowledged.	
Sorrell, Mary Evelynn	It's time to think of the individuals, families and communities IN the United States that would be, or believe they will be, adversely affected by this project. Say no, we don't want or need this project. The cost to our citizens is too high.
Response: Comment acknowledged.	
Soto-Vigil, Che	I live in an oil town and am scared to death of the potential damage these traveling bombs bring. Please stol this form of crude transport, particularly for the Bakken crude which is so volatile!
Response: Comment acknowledged.	

Commenter Name	Comment
Souchock, Scott	Oil trains are not safe. Period. End of discussion. And the potential for disaster in Grays Harbor is too great a risk for that community and the Northwest to bear in general. Oil trains and oil terminals DO NOT BELONG in Grays Harbor or anywhere in the Northwest. Period. End of discussion.
Response: Comment acknowledged.	
Soul, Veronika	Oil belongs in the ground. It is time to transition to alternate energies.
Response: Comment acknowledged.	
Soussou, Helen	Thank you for reading my letter. America needs to keep its focus on increasing renewable energy and not supplying the world with toxic tar sands oil and volatile Bakken crude. Plus the area discussed is beautiful and a treasure.
Response: Comment acknowledged.	
Southwick, Alan	As time has proven, there's truly no safe way to transport oil. Ultimately either by ship, rail, truck or pipeline disaster ensues. Either that, or we must hold the oil companies accountable for losses and pollution! Thank you for reading my letter.
Response: Comment acknowledged.	
Sowerwine, Margaret	The risk of a spill on land or on the water is unacceptable.
Response: Comment acknowledged.	
Sparks, Carole	Production, transportation & export (especially through sensitive Harbors) are anathema to clean water and clean air. Stop this insanity - we can do without foul energy. Thank you for reading my letter.
Response: Comment acknowledged.	
Spaulding, Stephen	The message is clear: We must reduce, not promote, the exploitation of fossil fuels.
Response: Comment acknowledged.	
Spear, Lauren	Alternative energy sources need to be actively pursued, instead of fossil fuels, which are destroying the environment of the whole planet. It's the only one we have.
Response: Comment acknowledged.	
Spence, Kathy	We can't afford anymore pollution!
Response: Comment acknowledged.	
Spence, Michael	The last thing we need is more, and more dangerous, rail traffic or facilities that make it easier for oil shippers to send more trains to and through our region. These trains are effectively just long fuses, waiting to be lighted by an accident and to explode in our communities. Stop the two terminals slated for Grays Harbor, Washington. That area thrives on fishing and tourism, both of which would be damaged by any notable rail or terminal accident.
Response: Comment acknowledged.	
Sperry, Carol	Thank you for reading my letter. Please do the right thing!
Response: Comment acknowledged.	
Spiezio, Joseph	It's already been proven as a dangerous enterprise considering the fires and explosions which have already taken place! Shut down the OIL TRAINS NOW!
Response: Comment acknowledged.	
Spillers, George	I am supportive with all those who are opposed to building oil shipping terminals that would be a thoroughfare thru Grays Harbor.
Response: Comment acknowledged.	
Splan, Mary	Thank you for reading my letter.Please! NOT IN GRAYS HARBOR!
Response: Comment acknowledged.	
Springer, John	We cannot risk further changes to the climate!
Response: Comment acknowledged.	
Spurgas, Joseph	Thank you for reading my letter. We need to invest in renewable energy not oil.

Commenter Name	Comment
Response: Comment acknowledged.	
Spurling, Leslie	We are opposed to export of our nonrenewable resources. As long as we are dependent on these, we need to use ours right here. A better plan is to use our own oil based products while we make good progress to a renewable energy future.
Response: Comment acknowledged.	
Spyker-duncan, Kasi	People across the country - like myself - treasure the natural beauty of Washington's waterways and harbor. Please don't endanger them - we will all suffer for it.
Response: Comment acknowledged.	
Squeglia, Vanessa	Put the money into solar incentive programs to save our environment.
Response: Comment acknowledged.	
St. John, Elizabeth	America is too Rich in Natural Wonders and Resources to be turned into a Wasteland. Be Grateful. Practice Stewardship!
Response: Comment acknowledged.	
St. John, Penny, Aka Linda	This is too risky to believe. We have to prevent the deragation of our beautiful coast and our oceans.
Response: Comment acknowledged.	
Stafford, Dawn	Oil needs to be a thing we have used in the past, we now have new ideas and heal this earth yet we can't try as long as the oil industries make the decision!! I vote change on the this to save our planet!!!
Response: Comment acknowledged.	
Stains, Valerie	By rail, tanker, or pipeline, transporting crude oil is an environmental disaster waiting to happen. Please pay attention to recent mishaps. Thank you for reading my letter.
Response: Comment acknowledged.	
Staley, Sheri	We need to move forward not backward when it comes to energy. Why would we risk this amazing place for this purpose? Just say no and move to clean energy and a better tomorrow!
Response: Comment acknowledged.	
Stallman, Richard	The Keystone XL pipeline has been cancelled. Please don't allow it to be replaced with oil trains to Washington State. We need to keep the tar sands oil in the ground, to avoid toxic spills and disastrous global heating. Oil trains will also cause fires repeatedly.
Response: Comment acknowledged.	
Stalnaker, Ward	We know fossil fuels are on their way to being history. Why allow them to endanger our communities?
Response: Comment acknowledged.	
Stamps, Gail	I live in a small city which has many freight trains going through at all hours of the day or night. anyone of them could be caring coal or oil. I want to be safe so make these trains safe for me and everyone who lives here.
Response: Comment acknowledged.	
Stangle, Jeanne	Thank you for reading my letter. Please no oil transport through these delicate coastal areas important to Native American tribal culture. These people have already been robbed of much of their heritage. Please preserve environment, No terminals for Grays Harbor
Response: Comment acknowledged.	
Stanley, Terri	Time is ticking and I believe the tipping point is nearer than first believed. Warming will not take place in a straight line, but rather geometrically. Save the planet and all of us, slow the transport of oil.
Response: Comment acknowledged.	
Stansfield, Jack	The dangers and disadvantages far outweigh the advantages.
Response: Comment acknowledged.	

Commenter Name	Comment
Stapleton, Shirley A	Thank you for reading my letter. It is my most sincere hope that you take into consideration the voice of the people who are concerned for the welfare of everyone now and the future.
Response: Comment acknowledged.	
Star, Star	Thank you for reading my letter. death to the death-for-profit corpocracy!!!
Response: Comment acknowledged.	
Starchylde, Khier	Please think of the Earth and the people. Be environmentally friendly, please!
Response: Comment acknowledged.	
Stark, Sandra	Thank you for reading my letter. Alternative energy is where wee should be putting our funding and labor resources.NOT CRUDE OIL!
Response: Comment acknowledged.	
Stark, Tom	I am just sick and tired of big oil and their needs. These sorry SOBs get write offs, governmental perks and still charge We the People an arm and a leg tog et from point A to point B.
Response: Comment acknowledged.	
Starnes, Margaret	Please think about the future for our children and grandchildren. What kind of legacy do we want to leave - clean air and water or unfettered climate change?
Response: Comment acknowledged.	
Stauduhar, Terry	Not only is it dangerous and destructive of local benefits but transportation of yesterday's energy would use money better spent on infrastructure and other needs. Please reject this very bad idea. Thank you.
Response: Comment acknowledged.	
Stava, Michelle	Shipping oil out of our country makes no sense for the American public. It provides few jobs, creates a hazardous environment, and increases pollution. The costs out weigh any benefits to a few, and have an overall negative impact on the environment. I tr
Response: Comment acknowledged.	
Stearns, Oliver	Dear Ecology and Hoquain. The Washington state area is one if the most pristine and untoached ecosystem in the United Stateds. All sorts of Marine life live their like whales and seals. Also some of the last remaining wolves live their. Please do not threaten this ecosystem by bringing in big oil tankers, pipes and railroads.
Response: Comment acknowledged.	
Stearns, Robert	It's time to turn down the building of oil shipping terminals in Washington state!
Response: Comment acknowledged.	
Stearns, Wat	time for sustainable energy -- how many indications do we need? chronic illness is rampant, oil spills everywhere, the Gulf is dead, the West Coast is dead, all from unsustainable energy.
Response: Comment acknowledged.	
Stebbings, Barrie	How many crimes against nature will it take before justice prevails and polluters are held accountable? I guess you're assuming never. I'd think again.
Response: Comment acknowledged.	
Steele, Beverley	Fossil fuel is now as obsolete as the dinosaurs from which it came. We have the technologies now for clean energy. Let's just get on with it for the benefit of the planet.
Response: Comment acknowledged.	
Steensma, Monica And Hugo	Fossil fuels use is KILLING our climate, & eventually will kill us, too. We MUST act to drastically curtail & then, as quickly as possible, phase these filthy, toxic fuels out of existence -- before we are in the midst of an IRREVERSIBLE CLIMATE CRISI
Response: Comment acknowledged.	
Steeves, Robin	I live by train tracks that will carry this dangerous material. I DO NOT want it near my home or my family!
Response: Comment acknowledged.	

Commenter Name	Comment
Steffens-Nett, Hope	We can't take the risk of spills and fires in our cities, towns, creeks, rivers, oceans and countryside. Our environment and public health are too precarious and precious to harm with unnecessary expansion of oil transport.
Response: Comment acknowledged.	
Steger, Linda	The proposed oil shipping terminals, the explosive, dangerous oil trains needed to feed them, and the continual parade of oil tankers and barges taking the crude over thriving marine waters puts the health and safety of the communities, the local economy,
Response: Comment acknowledged.	
Stein, Cindy	Expanding oil transportation is playing with fire. We've seen time and time again how everyone and everthing including wildlife are horrible harmed. And the repercussions last for many years. Please don't allow this to happen. Thank you.
Response: Comment acknowledged.	
Stein, Ken	Please don't allow this expansion to happen. This is only allowing for more dangerous spills to occur. Our wildlife have no voice on this. We must be their voices too.
Response: Comment acknowledged.	
Steiner, Kay	Thank you for reading my letter. The fossil fuel industry is destroying this country. If they even think there is a drop of oil, gas or coal they want to drill, frack, mine for it. It doesn't matter if it is public land, a native habitat for an endanger
Response: Comment acknowledged.	
Steinhart, Carol	Continued expansion of fuels transport facilities is not only asking for tragic accidents, it is enabling climate change. Now that it is clear that use of fossil fuels must be sharply curtailed if we hope to have a climate we can live in, it is senseless,
Response: Comment acknowledged.	
Steininger, Adrian-Lee	We need to stop using oil which has uranium in it which is harmful to all humans and animal species. We've had plenty of time to invent and use alternate energy sources that are safe. The only reason we are still using oil is to make the rich richer and they pay our President? Obama and some Congressmen/women to run so that they are owed favors and these people vote with oil companies. Please do what is right by God and the American people. Maybe one of the reasons we have so much cancer today is the result of oil. Thank about that.
Response: Comment acknowledged.	
Stenflo, Jahnavi	A very BIG NO to increased crude oil rail traffic, oil spills and carbon pollution! NO!
Response: Comment acknowledged.	
Stephens, Judith	We needto switch to none contaminating forms of energy. The knowledge is out there yet our government would rather spend our tax dollars and fund raised money on clean ups and pipe laying. It makes no sense other than greed!
Response: Comment acknowledged.	
Stephenson, Ellen	Thank you for reading my letter. I hope you take it seriously.
Response: Comment acknowledged.	
Stephenson, Michael	Please protect God's creation from Big Oil. Thanks!
Response: Comment acknowledged.	
Stermer Sr, David L	This is a total nightmare.
Response: Comment acknowledged.	
Stern, Jan	A new rail line has already been built by CN in Duluth, MN for the sole purpose of moving oil by rail. Not at all happy about that. Thank you for reading my letter.
Response: Comment acknowledged.	
Stetler, David	Keep domestic oil here and push for the development of green energy.

Commenter Name	Comment
Response: Comment acknowledged.	
Stettner, Arianthe	I am very concerned about the negative implications increasing US exports of crude oil by building these new oil terminals. There is scant public benefit, rather, there is increased carbon pollution, environmental hazards, and risks to public safety. This project must be stopped.
Response: Comment acknowledged.	
Stevens Ii, A.	We do not need more oil spills along our coasts, rivers, or on our lands. We do not need our drinking waters contaminated with toxic chemicals from oil. We do not need more catastrophic explosions at our ports or rail terminals. What we need is to wean off of fossil fuels and depend on alternative/renewable energy resources. We need to concentrate on the infrastructure for alternative/renewable energy. Thank you for reading my letter.
Response: Comment acknowledged.	
Stevens, Diana	When do we stop bending and twisting the laws to suit our power hungry government?
Response: Comment acknowledged.	
Stevens, Gavi	Thank you for reading my letter. We can't be just a series of pipelines for moving trash oil from one country to be sent to other countries. It is dangerous and the companies involved have an extensive history of catastrophic failures causing enormous environmental and property damage.
Response: Comment acknowledged.	
Stevens, Joshua	My family and I work everyday towards making our world a better place for everyone, so should you and yours.
Response: Comment acknowledged.	
Stevens, M	WE should have been seeking alternative energy sources 30 years ago. Let's stand against fossil fuels!
Response: Comment acknowledged.	
Stevens, Patricia	We need to end the era of careless handling of fossil fuels that can destroy our precious living space.
Response: Comment acknowledged.	
Stevens, Susan	Situation is a nightmare right in Philadelphia. these "bomb" trains run alongside schools and playgrounds in addition to residential buildings.
Response: Comment acknowledged.	
Stevenson, Will	Oil trains are a serious threat to the health and safety of us all, one never knows when one could derail and explode in our backyards
Response: Comment acknowledged.	
Stevesand, Patricia	Oil is on its way out. Don't allow more infrastructure on this archaic energy source.
Response: Comment acknowledged.	
Steward, Jack	Why not spend the money involved with this project to promote AND INSTALL more renewable energy sources? After trying to get what is left of petroleum out of the ground, are you really willing to live with the possibility of pipeline breaks and related pollution? It's the 21st century and oil is a thing of the past.
Response: Comment acknowledged.	
Stewart, Adam	God bless you all! God bless your families and everyone else in your lives! God bless everyone!
Response: Comment acknowledged.	
Stewart, Andrea	My yard and my childhood home's property are in the path of a dangerous pipeline proposed by NEXUS, which will pollute my air and water and land, lower my property values, and have me waiting for an inevitable explosion. Renewable sources are the answer to this.
Response: Comment acknowledged.	
Stewart, Helen & Jamie	I believe most adults and nearly all younger people know when we are being treated like mushrooms. Please do not fall for big oil's insistence that this is necessary for our economy. It isn't.Thank you for reading my letter. Always, JDS

Commenter Name	Comment
Response: Comment acknowledged.	
Stewart, Janice	If we had clean solar and wind energy, we wouldn't need to transport filthy waste. Focus on clean energy!
Response: Comment acknowledged.	
Stewart, Jason	The oil industry has been able to make huge profits for decades because they could transport the oil cheaply using the subsidized transport that was intended for humans. If they want to make profits they need to transport their dangerous cargo via safe me
Response: Comment acknowledged.	
Stewart, Katherine	Keep oil in the ground and build solar and wind, and hybrid or electric cars to stretch all the petroleum resources for centuries to com.
Response: Comment acknowledged.	
Stewart, Michael	Climate change is the single most dire problem facing all of humanity. A huge portion of known fossil fuel reserves must stay in the ground if we are to maintain a livable planet. Extracting and exporting fossil fuels will not lead to a solution to the problem of climate change. Thank you for reading my letter.
Response: Comment acknowledged.	
Stiefel, Catherine	Individuals, corporations and governments must embrace change and move toward a cleaner future. Please be an agent for sustainable change. Thank you for reading my letter.
Response: Comment acknowledged.	
Stiler, Jay	I have personally decided to support a petroleum product-free future. We need to no further investment in that infrastructure. We need alternatives NOW! Thank you for reading my letter.
Response: Comment acknowledged.	
Stiles, Robin	Jobs can be developed in the clean energy sector. Thank you for reading my letter. Robin
Response: Comment acknowledged.	
Stillman, Cindy	We only have one Earth - please protect her. Why are some people so heartless and do not see what harm they do.I do not understand them. Let Nature alone - money will not buy them there power they think is so important. Let the world alone.-
Response: Comment acknowledged.	
Stites, Larry & Phyllis	We do not need oil expansion for all they want to do is ship it out of this country. We need to promote green technology which does not pollute.
Response: Comment acknowledged.	
Stoddard, Alison	Thank you for reading my letter.enough is enough, there must be safer ways to transport and different energy sources we can use.
Response: Comment acknowledged.	
Stoffer, M Jane	It seems timely to put resources into renewable energy rather than tired, old industries.
Response: Comment acknowledged.	
Stofft Katos, Janet	Let's shift to non-fossil fuels and eliminate these problems.
Response: Comment acknowledged.	
Stoike, Richie	stop this now.
Response: Comment acknowledged.	
Stokely, Linda	Please stop mining for oil and think about the future of our children. We need to move towards renewable, safe resources!
Response: Comment acknowledged.	
Stoker, Stephen	Greed will have to be replaced by reason and respect for the environment.
Response: Comment acknowledged.	
Stolfus, Mary	Please do not allow this to happen anywhere in Washington.
Response: Comment acknowledged.	

Commenter Name	Comment
Stoll, Marcia	Not only do we need to protect our communities from the devastating effects of oil spills, but we must take urgent action to keep oil in the ground if we are to address our climate change dilemma.
Response: Comment acknowledged.	
Stoltenberg, John And Martha	Capitalism's short term profit motive is incompatible with long term public safety and long term environmental safety!
Response: Comment acknowledged.	
Stone, Darby	Oil will overtime destroy the Earth and the human race be no more.
Response: Comment acknowledged.	
Stone, James	Fossil fuel energy shouldn't take priority over a clean healthy environment. Please protect our people, our water, and our air instead of risking it all for outdated polluting energy. Thank you for reading my letter.
Response: Comment acknowledged.	
Stone, Sheila	Public safety and mitigating climate change is more important than corporate oil profits.
Response: Comment acknowledged.	
Stonebraker, Marilyn	The permits need to be rejected. Grays Harbor port is too tiny compared to Texas crude oil storage facilities that sit directly on the Gulf of Mexico that is a massive body of water. A spill in Grays Harbor would go to both sides of the Harbor in no time, drastically effecting Westport and Ocean Shores. Any seafood will be destroyed for decades. It will sit next to the Grays Harbor National Wildlife Refuge where TWICE A YEAR MIGRATING BIRDS STOP TO REST AND EAT. There are only four migrating bird stops in the United States where they eat along with resting. Even a tiny spill will cause birds on the endangered list to become extinct and so many will die from the mass population at that time. A spill could happen a week before the birds come and they will still die because their food will be contaminated for decades. Because of the massive seafood industry here and the bird migration site the permits must be rejected.
Response: See Response to FL1-1.	
Stoneburner, Susan	Why do we need oil ports? Our country is pumping more of our own oil so why create ports which could potentially create more ecological damage then necessary. Please reconsider the oil ports. They are not necessary. Thank you
Response: Comment acknowledged.	
Stoner, RS	WE live on Lake Superior where there are tankers that take piped oil from all over across 1/5 of the world's fresh water (our lake). It takes 200 years to rejuvenate the lake naturally. A catastrophe would be a crime in this world of fighting over fresh, clean, potable water. I can now drink out of this lake. How long will we be able to do that with all the awful stuff that's going on. Please stop this.
Response: Comment acknowledged.	
Stookey, Jeff	We must keep fossil fuels in the ground, not extract them and transport them thousands of miles. We currently have all the scientific and technical knowledge and the physical resources to get all of the energy we need from renewables, according to Mark Z.
Response: Comment acknowledged.	
Stoops, Ward And Anne	Stop this dangerous practice before we have another massive tragedy!
Response: Comment acknowledged.	
Stopfel, Virginia	With all the energy possibilities in the mix, transporting crude oil from north to south is not necessary.
Response: Comment acknowledged.	
Storey, Sr., Don	Please protect our environment.
Response: Comment acknowledged.	
Storm, Bonnie	We need to concentrate on developing renewable energy sources, not continue ruin our planet with more and more pollution.
Response: Comment acknowledged.	

Commenter Name	Comment
Storm, Laurie	Stop allowing Canada to use this country as pipeline for their oil shipping, they can figure it out in Canada, not in the USA.
Response: Comment acknowledged.	
Storrar, Ann	It just doesn't make sense to risk the health of our environment and our citizens so that a few big companies can profit from selling oil to China.
Response: Comment acknowledged.	
Storwick, Sandra	There are cleaner, more bio compatible, earth friendly sources of energy. Please do not support the expansion of the fossil fuel industry.
Response: Comment acknowledged.	
Story, Cynthia & Ted	Please stop this filth forever.
Response: Comment acknowledged.	
Stoudt, Michele	Stop the expansion of dirty nonsustainable oil transportion thru our state. It leaves us venerable to the inevitable tragedies associated with rail and oil tanker disasters.
Response: Comment acknowledged.	
Stout, Ronald	Our rivers are already Superfunds . We need to move away from carbon based fuel in order for this Planet's inhabitants have a chance of surviving our incompetence . Not only does the oil have to be stopped , but we must change our economic system because relentless Capitalism has destroyed our food , air , water , and land , decimating whole species as we hack away ar rhis Rock we call Home !
Response: Comment acknowledged.	
Stoutamyer, Carla	No oil shipping tunnels!
Response: Comment acknowledged.	
Strader, Helen	We do not need these two terminals and the tremendous risk to life and environment that they would pose.
Response: Comment acknowledged.	
Straka, Anthony	It's clear that the risks involved in the industrial scale transporting and exporting of oil are not worth taking. Thank you for reading my letter.
Response: Comment acknowledged.	
Straley, PE	We need to STOP SENDING OUR RAW MATERIALS OVERSEAS!!! Absolutely nothing is right about this expansion of oil transportation situation (except for the mega petro corporations that benefit at the expense of the Earth & those of us living here being exploi
Response: Comment incomplete.	
Straw, Roger	Grays Harbor is an important stop along the way from destructive mining of tar sands crude in Canada and from fracking operations in North Dakota ... to my small town of Benicia, California. Here in Benicia, our Valero refinery is seeking a permit to bri
Response: Comment incomplete.	
Streber, Mike	Let's not take a chance to spill oil anywhere.
Response: Comment acknowledged.	
Streck, Diane	Transporting oil is risky business. There have been two train derailments and spills of oil just in the past week in Wisconsin. The proposed oil shipping terminals in Washington will put the environment in jeopardy getting the crude oil to the terminals
Response: Comment acknowledged.	
Street, Rhett	How many times has a company completely cleaned up a site after a chemical spill COMPLETELY? NEVER..... What makes us think they will if it happens in Oregon?
Response: Comment acknowledged.	
Stringfellow, Scot	These cars a getting more dangerous because cities are growing. What used to be a rural route, is now downtown for some of these smaller towns.
Response: Comment acknowledged.	

Commenter Name	Comment
Stromberg, Kathy	It's only a matter of time before there is a spill or accident to the community.
Response: Comment acknowledged.	
Strong, Lynn	Until such time as frequent spills accidents are less common, please protect our environment until our protection technology is much improved. Thanks. L. Strong
Response: Comment acknowledged.	
Strothkamp, Kenneth	The risks associated with transport of crude oil by train through Oregon are not worth the benefits. We need to move away from use of fossil fuels and all attempts to increase development and transport of fossil fuel simply delay the switch to renewable energy that we need.
Response: Comment acknowledged.	
Struebing, Wesley	Leave the crude in the ground. Thank you for reading my letter.
Response: Comment acknowledged.	
Struss, Wilma	I understand Saudi Arabia has bought land in Nevada and California and is raising alfalfa there and shipping it "home" to feed their cows so they will have milk for their kids. Their water wells have dried up. And we need more oil facilities? I don't think so. If our wells dry up or are contaminated where will we go for good water? Think about that.
Response: Comment acknowledged.	
Stuart Dvm, Dr Bud	It's the RIGHT thing to do!!!
Response: Comment acknowledged.	
Stuart, Annie	Enough is enough.
Response: Comment acknowledged.	
Stuart, Melissa	The profit of a few is not worth the risk to our lost natural heritage and life.
Response: Comment acknowledged.	
Stuemke, Roberta	When you consider the cost of building the terminals, add the cost of transporting crude oil, and then include the horrible costs of the inevitable oil spills, leaks, explosions, and terrible environmental risks - this is a complete Lose-Lose proposal. I
Response: Comment acknowledged.	
Sturge, Greg	Please do the right thing: stop the endless irresponsibility recklessly harming our home planet and fragile environment. Stop transporting fossil fuels and move to sustainable renewal energy.. Now!
Response: Comment acknowledged.	
Sturgess, Colin	Stop the transportation of crude oil!
Response: Comment acknowledged.	
Sturino, Angelo	Have your driven on our streets today ? the hustle and bustle of the drivers cars, and pedestrians attempting to cross . Now , picture a big oil tanker in the middle of State and Lake St. ..
Response: Comment incomplete.	
Sturm, Anne	Sun and wind are going to replace dirty crude oil very soon. Please don't jeopardize Grays Harbor sensitive environment.
Response: Comment acknowledged.	
Sturm, Lois	Why are we investing in the things that kill us?
Response: Comment acknowledged.	
Styga, John	Th Take Action Stop our country from being turned into a thoroughfare for crude oil transport!ank you for reading my letter.
Response: Comment acknowledged.	
Sudano, Alice	Fracking our land isn't enough danger? Too many dangerous chemicals moving by rail, not just crude! STOP!
Response: Comment acknowledged.	

Commenter Name	Comment
Sulley, Paul	Obama should have approved the Keystone Pipeline to lessen the rail trafficking of oil.... Say yes to pipelines!
Response: Comment acknowledged.	
Sullivan, C.	Support and invest in clean energy. Save our planet. Thank you for your consideration.
Response: Comment acknowledged.	
Sullivan, Catherine	Thank you for reading my letter. I live near Albany, NY where the oil trains are already an issue. Citizens are very upset that their lives are placed in the paths of possible disasters from trains that already have violations on record.
Response: Comment acknowledged.	
Sullivan, Dianne	No Citizen should be exposed to risk of explosion because of OIL TRANSPORT. I live within 2 miles of Rail lines. There are thousands of homes within the Rail line area. STOP THE RISK. STOP OIL TRANSPORT IN CA via Rail that is near Residencial areas.
Response: Comment acknowledged.	
Sullivan, Gail	Oil trains are not only a disaster for the environment but also a enormous danger to people all along their long routes. They need to be heavily regulated if not abandoned outright.
Response: Comment acknowledged.	
Sullivan, Joan Paul & PJ	They will be the ones to blame for the increase of cancer & will make it worst for our next generation! Also, they are hurting their own families! How ruthless is this!!
Response: Comment acknowledged.	
Sullivan, Judith	Thank you for reading my letter. As a member of "Benicians for a Safe and Healthy Community," our city's local opposition to Valero Benicia Refinery's project for CBR in northern California, I am responding to this concern. We have done extensive inve
Response: Comment incomplete.	
Sullivan, Md, Robert	We as a people have to grow up and realize we live in a finite and somewhat fragile world. So far we've acted like teenagers, nearsighted and selfish.
Response: Comment acknowledged.	
Sullivan, Moira	Ummm...correct me if I am wrong, but aren't we in rapid retreat (or should be) from using old dinosaur bones as fuel? With wind, solar and other green technologies, the move today - with the catastrophic effects of global warming at our doorstep daily, compels us to reject dirty oil - and therefor any and all expansion, and move towards intelligent forms of energy. Let's get with it! We are already decades behind where we need to be,
Response: Comment acknowledged.	
Sullivan, Thomas	Let's do something about this - I'm looking at you Congress.
Response: Comment acknowledged.	
Summer, Sharon	Let's keep our oil in our country as we are stressing the environment shipping it and using our countries resources for big companies profits
Response: Comment acknowledged.	
Summers, Bonnie	This issue is urgent. Thank you for your thoughtful consideration. I look forward to your response.
Response: Comment acknowledged.	
Summers, Jan	The goal must be to Protect our land air, & water. NO MORE Oil Terminal Development in Grays Harbor or any harbor!
Response: Comment acknowledged.	
Sundberg, Carol	We must protect our beautiful country.
Response: Comment acknowledged.	
Sundstrom, Karl	It is past time to stop these destroyers of the earth from ruining the planet
Response: Comment acknowledged.	

Commenter Name	Comment
Sunfire, Michael	We must promote clean environment and protect the planet, and We the People from greedy heartless people who pretend to be in business.
Response: Comment acknowledged.	
Sunlake, Tom	The LAST thing we need is an increased risk of a volatile tank train derailment, collision, spill, fire, or explosion, putting people and property at risk. The dangers are not worth the risks. Please don't do it. Thank you.
Response: Comment acknowledged.	
Suriner, Noreen	Thank you for reading my letter. It profoundly concerns me that a pipeline NOT through a major aquifer could not be found.
Response: Comment acknowledged.	
Susta, Emily	enough already....
Response: Comment acknowledged.	
Sutherland, Hugh	It is against our national security interests to export crude or refined petroleum products. Our fellow citizens who volunteered to serve in our armed forces have given life and limb to protect our access to foreign oil sources. How can we now export excess production?
Response: Comment acknowledged.	
Sutliff, Lorna	Baby steps to move away from fossil fuels and force the federal government to seek renewable resources.
Response: Comment acknowledged.	
Sutliff, Willis	Fossil fuels need to stay in the ground.
Response: Comment acknowledged.	
Sutton, Diane	Please stop
Response: Comment acknowledged.	
Svendsen, Kathy	Oregon depends on clean rivers for fishing, pure water, beautiful trees and mountains to attract tourism. Most of the lumbering industry has been shut down, leaving many people with no source of income. If these trains run roughshod through all this, it w
Response: Comment incomplete.	
Svensson, Audrey	I am concerned about this and I vote!
Response: Comment acknowledged.	
Swallow, Pamela	Oil transport in New Jersey is dangerous.
Response: Comment acknowledged.	
Swanke, Schurkey	Why in hell would we export North American oil to China when prices are LOW, when we've been importing oil when prices are HIGH? The USA would be a two-time loser in that series of transactions.
Response: Comment acknowledged.	
Swansbro, Guy	"This we know. All things are connected like the blood which unites one family. All things are connected. Whatever befalls the earth befalls the sons of earth. Man did not weave the web of life; he is merely a strand of it. Whatever he does to the web, he does to himself." Chief Seattle circa 1850.
Response: Comment acknowledged.	
Swartz, Deborah	Let's keep moving toward complete renewable and cleaner energy.
Response: Comment acknowledged.	
Swartz, Fred	Stop this fossil fuel craziness...save life as we know it.
Response: Comment acknowledged.	
Sweeny, Peter	Stop expanding oil transit routes and increase clean energy projects.
Response: Comment acknowledged.	

Commenter Name	Comment
Sweet, Carroll	We in Columbia county feel like we are being treated like a sacrifice zone. We gain nothing from the oil being transported through our communities, but stand to lose everything if something goes wrong.
Response: Comment acknowledged.	
Sweetwater, Danda	The pollution and risks are not worth it! Washington State's movement toward renewable energy is timely and a better way to meet energy needs and to address global warming! I strongly urge you to reject the proposed oil terminals! Thank you.
Response: Comment acknowledged.	
Swenning, Christine	Thank you for reading my letter. How many more floods and fires do we need to convince y'all to DO SOMETHING...
Response: Comment acknowledged.	
Swenson, Erik	Stop this facilitation of our fossil fuel addiction. We need to do everything to make carbon-based energy use history.
Response: Comment acknowledged.	
Swift, Sharon	The rail corridor through Aberdeen and Hoquiam is extremely near to the business districts and homes. A spill or fire or explosion would be disastrous businesses and lives. Also, marine life and natural bay and beach environments are a heritage that must be maintained for the welfare of the future generations of this unique region. Don't throw away this beautiful gift of nature. One oil spill can do massive damage.
Response: Comment acknowledged.	
Swiger, Michael	Please help stop this and keep America safe
Response: Comment acknowledged.	
Sword, Carol	There are no benefits to citizens that outweigh the dangers.
Response: Comment acknowledged.	
Szilagyi, David	Time to change to clean energy!
Response: Comment acknowledged.	
Szumlas, Nick	The possibility of an accident from oil trains is too strong a chance to take for your community.
Response: Comment acknowledged.	
Tague, Lois	Oh yes, this is JUST what we need! I'm not going to go into All the reasons this is a Horrible plan - we all know them by now. Oil Companies are making record Profits; they want MORE no matter who gets hurt; they aren't being proactive & thinking about t
Response: Comment incomplete.	
Takacs, Judith	To high a price to pay for this progress.
Response: Comment acknowledged.	
Talbot, Frank	Transporting oil and other fossil fuels is endangering communities and not moving us towards a sustainable future. Oppose any attempts to expand the transportation of fossil fuels, and take action to reduce the current levels.
Response: Comment acknowledged.	
Talton, Gary	As a child, I marveled at the beauty and awesomeness of nature. I of course thought it would always be like that. As I have grown and watched the destruction of our natural resources I cannot help but feel a great sense of sadness at our carelessness with
Response: Comment incomplete.	
Tam, Lisa	Thank you for reading my letter. I appreciate the time you have taken. I am convinced that the risk of the pipeline does not justify the risk. Jobs will be minimal, and many are temporary. The risk to the environment is clear. Too many spills and accidents have happened in the past two years for us to not take this seriously. The route of the pipeline means any spill could have effects that would outlast us and our children.
Response: Comment acknowledged.	

Commenter Name	Comment
Tan, Shirlee	Please do not allow expansion of oil activities in our beautiful state! Few will benefit, while the majority lose out! We are much better off preserving what we have and keeping our state clean and beautiful!
Response: Comment acknowledged.	
Tango, Romeo	The alarming safety record of oil trains means an explosive oil train derailment is not a question of if, but when. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the
Response: Comment acknowledged.	
Tansill, Roy	Leave the fossil fuels where they are safely underground then we won't have to worry about the pollution from spilling it, refining it, nor burning it.
Response: Comment acknowledged.	
Tanz Kubota, Ria	Firebombs don't seem like the best idea to me, but I notice big oil and big energy find it reasonable and acceptable evidently.
Response: Comment acknowledged.	
Tarpley, Polly	Proven polluting, greedy, unreliable, unsafe, AND NOT WANTED! This should be the end of the discussion! No Oil Trains/Transport in our beautiful Northwest!
Response: Comment acknowledged.	
Tarver, Helga	Thank you for reading my letter. We do NOT need any more oil or dangerous oil shipments.
Response: Comment acknowledged.	
Tate, Christine	time for change, let's get off toxic oil and stop producing more terminals for oil
Response: Comment acknowledged.	
Tayloe, Darren	Clean energy is the answer.
Response: Comment acknowledged.	
Taylor, Aileen	Keep WA State pristine.
Response: Comment acknowledged.	
Taylor, James	DON'T RISK OUR ENVIRONMENT -- Thank you for reading my letter.
Response: Comment acknowledged.	
Taylor, Jerry	These Oil companies MUST be stopped! We need to be 100% renewable. Stop it with the dirty oil!!!!!
Response: Comment acknowledged.	
Taylor, Kamia	We don't need to keep removing fossil fuels and destroying our country to ship it away!
Response: Comment acknowledged.	
Taylor, R	Fossil fuel is a thing of the past; the great harm it has done to our climate, etc. is mind-blogging; yet, the corrupted polluters are getting away with murders. Stop the dangerous expansion of polluting oil, and transportation of this terribly polluting substance. Thanks
Response: Comment acknowledged.	
Teeters, Rebecca	We do not need to endanger our already fragile environment with the likely spill of fossil fuels.
Response: Comment acknowledged.	
Tempel, Norm	Get the oil trains out of my back yard.
Response: Comment acknowledged.	
Templeton, Bonnie	Our oil should not be shipped overseas. Oil companies should not be able to destroy our country to get the oil and then send it elsewhere for bigger profits.
Response: Comment acknowledged.	
Tentler, Justin	Thank you for reading my letter.We don't want,don't need and can't afford the environmental disaster transportation of crude oil across our inter-continental railways for foreign consumption.With the glut in World Oil supplies and reserves at an all time high and record new crude oil and natural gas deposit discoveries seemingly every other day,the time to diversify our own energy portfolio and encourage our competitors and allies to do so as well is long since come to

Commenter Name	Comment
	pass.We need to leave the majority of these huge new oil and gas reservoirs in the ground and discourage the idea of moving the supplies already in the system "cheaply"across our landmass from coast to coast to service the ravenous appetites of the Chinese and Indian economies.
Response: Comment acknowledged.	
Terrill, Nancy	Thank you for reading my letter. Transportation of crude oil across long distances just invites spills and leaks and more pollution.
Response: Comment acknowledged.	
Terrulli, Anthony	I am thoroughly against the expansion of oil transport which puts wildlife and our oceans at a horrible risk that is just too costly for our environment. please stop this from happening. thanking you in advance.
Response: Comment acknowledged.	
Terwedow, Susan	Using clean, renewable energy would save money and lives!
Response: Comment acknowledged.	
Test, Kevin	I am a lifelong resident of the Pacific Northwest... I urge you not to endanger the ecosystems of our coastlines by allowing oil shipping terminals in Grays Harbor... We must all work together to adopt sustainable economic growth... Fossil fuel production and consumption is not a responsible method for doing so... I am following this issue closely ... Kevin Test
Response: Comment acknowledged.	
Texel, Susan	Thank you for reading my letter. Please take the time to weigh the risks versus the benefits.
Response: Comment acknowledged.	
Thacker, David	Corporate Citizen my ass! Thank you for reading my letter.
Response: Comment acknowledged.	
Thieme, Mary	Obama has stopped the Keystone pipeline, do not let big oil create a bypass that prohibition this way.
Response: Comment acknowledged.	
Thoman, James	Fix existing pipelines before building new ones.
Response: Comment acknowledged.	
Thomas Hall, Linnea Fronce &	IF THEY ARE STILL TRYING TO IMPORT DIRTY KEYSTONE OIL, HOW IN THE WORLD CAN WE AFFORD TO SHIP OIL OUT OF THE COUNTRY. YOU CAN'T HAVE BOTH NEED TO IMPORT AND EXCESS TO EXPORT.
Response: Comment acknowledged.	
Thomas, Becky	The people of Washington don't want this, and neither do I. Thank you for reading my letter.
Response: Comment acknowledged.	
Thomas, Carol	Please use your influence to stop this disaster from happening. Protect people, animals, water and our future. Thank you.
Response: Comment acknowledged.	
Thomas, Jean	Keep fossil fuels in the ground. Think of future generations needing clean water instead of fuel through those pipes after contaminated water supplants our current resources locally.
Response: Comment acknowledged.	
Thomas, Kay	Risk vs. reward. A way for all of us to determine our path through life, and the risk in this case is too great for the reward. Please keep this in mind as you read my letter. Thank you.
Response: Comment acknowledged.	
Thomas, Lisa	Leave oil in the ground.
Response: Comment acknowledged.	
Thomas, Mary	We need to stop using crude oil in the first place. We must start using alternative energy sources. Mankind is destroying this planet.
Response: Comment acknowledged.	

Commenter Name	Comment
Thomas, Ph.d., Richard	These proposed terminals threaten the safety of Washington residents most of all, but it also threatens everyone's children, because it is one more expansion of the fossil fuel trade that threatens to ruin the earth's climate. You may think this sounds histrionic, but it is actually realistic; based on scientific data. In 20 or 30 years, people will be enraged and terribly discouraged that we have ignored these threats until it becomes too late to preserve a livable lifestyle for them. Please think about your own children and how far you are willing to go to protect their lives.
Response: Comment acknowledged.	
Thomas, Robert	This project is a bad business decision as the entire world is moving to reduce emissions. Find a way to re-direct these projects to support clean, safe, renewable energy.
Response: Comment acknowledged.	
Thomas, Tom	Our need to drill for oil was first put forward as a requirement for energy independence. The growing pressure for increasing exports betrays the true desire for increased drilling - oil company profits, which are already heavily taxpayer subsidized. Please do not stand for this rank hypocrisy, particularly with the increased risks both to the environment and populace through spills, oil train explosions and global warming. It is not about energy independence, and more jobs are being created every year through green energy industry. Think of the future - of the planet and diversity of life on it, and consider the rank hypocrisy shown by the oil industry and the risks inherent with expanding shipping terminals and turning our region into a thoroughfare for crude oil transport. Please, do the right thing.
Response: Comment acknowledged.	
Thomas, Virginia	Thank you for reading my letter.Protect our environment from oil contamination from oil spills and carbon pollution.
Response: Comment acknowledged.	
Thompson, Eric	Is the risk of an oil disaster worth what you stand to gain? My state has many reports of oil leaks (many in the tens of thousands of barrels and above) posted frequently. We are a relatively flat state with soil capable of soaking up most of the leaks so the leaks remain largley where they occur. You have a state with mountainous terrain and little loose soil. Any spill will likely go staight into your water sources and become the "incapable to clean up" spill that occured in the Yellowstone river last winter. Protect the lifeblood of your state and not a minor blip on your economic scene.
Response: Comment acknowledged.	
Thompson, Heather	So we can afford to export oil, I really do not get this. When something happens in the middle east the price of fuel goes up, keep it here until we can get total clean energy.
Response: Comment acknowledged.	
Thompson, Jeanne	Thank you for reading my letter. This is extrememely important to me and my family that we stop using crude oil and turn to a more healthy form of fuel.
Response: Comment acknowledged.	
Thompson, Jr, William	Please consider the hazards involved in transporting oil across our country ...to another country. How do the spills involved so far benefit our country...ALL of our country.
Response: Comment acknowledged.	
Thompson, Lawrence	We need to reduce our dependence on oil, not increase it!
Response: Comment acknowledged.	
Thompson, Linda	I don't want these crude oil trains passing through my region and subjecting the citizens to dangerous and toxic spills. I also don't want Grays Harbor, WA to be spoiled which it surely will be if the proposed terminals are built there.
Response: Comment acknowledged.	
Thompson, Marilyn	I am always amazed at what people will do for money. They also live in this environment but can't or won't see the dangers- or choose to stifle people who point them out- for the immediate reward of big bucks in their pockets. Really it's like a gambling addiction, but they are gambling with the entire planet and everything and everyone in it.
Response: Comment acknowledged.	

Commenter Name	Comment
Thompson, Tom & Mary	Thank you for reading my letter. Why build pipelines for a product we should be phasing out anyway.
Response: Comment acknowledged.	
Thorwarth, Peter	The days of oil are coming to a close. Let's not pollute our precious land and waters.
Response: Comment acknowledged.	
Thurston, Anne	We can no longer afford to ignore the risks of oil spills! Please take this appeal as serious and sincere.
Response: Comment acknowledged.	
Tice, Janet	Time for oil to stay in the ground. Let's move on to cleaner, better, safer energy.
Response: Comment acknowledged.	
Tice-tomasik, Candace	PLEASE put an end to the needless and ill advised construction of terminals that are just wrong on SO many levels. Once and for all, please embrace the movement away from fossil fuels and toward clean, renewable sources to meet our energy needs. If steps aren't taken right now, it is going to be too late!
Response: Comment acknowledged.	
Tierney, Robin	It is clear that expanding the oil shipping lanes, is both unsafe for our communities as well as the ocean and coastlines
Response: Comment acknowledged.	
Tietjen, Jamie	Thank you for mindfully reading and considering this message.
Response: Comment acknowledged.	
Tijerina, Kathryn	I will boycott any of your products until a change is made.
Response: Comment acknowledged.	
Tilden, Charley	Exporting crude oil is the wrong direction for this country.... please don't enable this bad idea to flourish by allowing terminals on our coasts.
Response: Comment acknowledged.	
Tilley, Charles	Please let's not take back the progress we've made in air quality over the course of years, by building dangerous oil transports across the beautiful Northwest. We must think about the rightful thing to do for the people & the region as a whole, just one slip, and we'll have another Alaskan type disaster on our hands.....on land. We don't need it, the risks way outweighs the benefits.
Response: Comment acknowledged.	
Tillier, Gisela	Isn't it time to recognize the harm fossil fuels and their transport bring upon our communities?
Response: Comment acknowledged.	
Timberlake, Ralph	Thank you for reading my letter. Let's fight for the planet.
Response: Comment acknowledged.	
Ting, Donna	Please stop expansion of oil transport. It is dangerous and detrimental to our environment. We do not want you to destroy our future on this planet.
Response: Comment acknowledged.	
Tipple, Michael	Please treat nature as a higher priority and do what makes sense for the environment and the people. Lineing the pockets of few at such a great risk is no longer acceptable.
Response: Comment acknowledged.	
Tischler, Barbara	Just another reason to move (and urge industry to move) more quickly toward clean, renewable energy sources...
Response: Comment acknowledged.	
Tischler, Jeffrey	Don't need this oil. The damage that could be caused exceeds the benefit.
Response: Comment acknowledged.	

Commenter Name	Comment
Tischler, Mark	Just another reason to move (and urge industry to move) more quickly toward clean, renewable energy sources...
Response: Comment acknowledged.	
Tivol, David	Just like Keystone XL, shipping terminals are inimical to keeping fossil fuels in the ground, which in turn is critical to minimizing climate change.
Response: Comment acknowledged.	
Tlustos, Mitch	I reside in Portland, Oregon but until recently I lived in Bellingham, WA. There it was the prospect of a large increase in coal trains adding to the already busy rail traffic and limited rail infrastructure through our small town. This is not the industrial NE. Please don't let our beautiful and fragile NW ecosystems fall prey to the harmful effects of the fossil fuel industry. Global warming requires that we phase out fossil fuels, not make way for more. Please don't let this go forward!
Response: Comment acknowledged.	
Toal, Gregory	Big Oil already pays little attention to anyone or anything other than what's in thier own best interest. Trains of crude are Toxic, Mobile Environmental Disasters traveling from state to state. BOMBS just waiting for someone or something to set it off.
Response: Comment acknowledged.	
Todd, Anne	Stop the building of oil terminals and future crude oil transport from Grays Harbor
Response: Comment acknowledged.	
Tokareff, Ray	Please do not put our state at risk for an oil spill. When the large earthquake that is predicted comes, this will only add to the magnitude of the clean up.
Response: Comment acknowledged.	
Tokuda, Tlaloc	STOP the dangerous expansion of oil transport at Grays Harbor! Has there been and EIS for the shipping terminals, oil trains & oil tankers? Keep it in the ground!
Response: Comment acknowledged.	
Tokunaga, Barb	It is time to make serious efforts to move away from fossil fuels and to move towards a cleaner energy future. We also need to protect our oceans and the people and wildlife that depend on them. Without a healthy environment, all life is at risk, includ
Response: Comment acknowledged.	
Toledo, Karen	Thank you for reading my letter. You've heard the facts a million times, so let me just say, "Let's stop being Canada's bitch & having our environment ruined for their profits!"
Response: Comment acknowledged.	
Tomes, Jim	Thank you for reading my letter. Destroying our world in the name of Profit for the Multi National Oil Conglomerates.
Response: Comment acknowledged.	
Tomkiel, Stanley	Fossil energy is rapidly becoming obsolete and has always been dangerous to our health, atmospheric balance and physical environment. There is no logical reason to extend the damage and risks.
Response: Comment acknowledged.	
Tompt, Tim	Make WA state a loud voice against expansion of dirty fuels, and for expansion of clean renewable energy.
Response: Comment acknowledged.	
Toshalis, Barbara	Thank you for reading my letter. This is an opportunity to take action to slow the devastating change in Earth's climate. Do not hesitate to stop these terminals.
Response: Comment acknowledged.	
Towne, Charles E.	Washington State is moving in the right direction - away from the use of fossil fuels. Among the reasons people visit Washington State are its natural beauty and ecologically sound policies. The movement away from fossil fuels is rapidly growing worldwide. Based on this movement, it is likely the oil industry will be walking away from the Grays Harbor terminals within the next twenty years leaving the community with an environmental and financial mess which may not be amenable to cleanup. Thank you for reading my letter.

Commenter Name	Comment
Response: Comment acknowledged.	
Townes, Sarah	I grew up in Seattle and also lived more recently in Bellingham, so Puget Sound is very near and dear to my heart. With the world so clearly needing to move away from fossil fuels why facilitate these projects which surely point to long term loss of much more importance than any short term financial windfalls? Sincerely, Sarah Townes
Response: Comment acknowledged.	
Townsend, Matthew	Thank you for reading my letter. Please be wise and swift to protect our planet.
Response: Comment acknowledged.	
Townsend, Patricia	I am a native Oregonian so no I do not want to see an industry here that will destroy everything this state stands for we appreciate the environment and want it left alone.
Response: Comment acknowledged.	
Townshend, Arianne	The article says it all: The proposed oil shipping terminals; the explosive, dangerous oil trains needed to feed them; and the continual parade of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of communities, the local economy, tribal culture, and our ocean and coastlines at risk. This is not the future we want.
Response: Refer to Draft EIS Section 4.7, Impacts on Resources, for descriptions of potential impacts that could result from the proposed action.	
Traeger, Nancy Carol	Since I live in a village with about 40 trains going through it each day, I am quite concerned regarding all of the oil tankers being carried through our village. I don't think we need any more export terminals for oil tankers. Enough is enough...Thank you
Response: Comment acknowledged.	
Trallo, John	Stop trying to transform the US into a third-world styled extraction colony for corporate profits. Time to end the fossil fuel age and move towards clean, renewable energy sources that will create good paying sustainable jobs, and more importantly, a sustainable future for our children and grandchildren.
Response: Comment acknowledged.	
Trapasso, Ann	Always abide by the physician's oath to "do not harm." Much sanity lies there.
Response: Comment acknowledged.	
Trask, David	This is not in any way anybodys idea of progressive and mindful climate protection. Under NO CIRCUMSTANCES SHOULD THIS BE ALLOWED TO HAPPPEN.
Response: Comment acknowledged.	
Traum, Norman	The time is long past to stop the destruction of our planet and of ourselves.
Response: Comment acknowledged.	
Travis, Priscilla	There have already been significant accidents involving trains transporting tar sands and shale crude oil across the U.S. and Canada. Continuing and increasing rail traffic with this hazardous material will result in more environmental damage, injuries and deaths.
Response: Refer to Draft EIS Section 4.5, *Environmental Health Risks—Rail Transport*, for a description of the potential risks that could result from the proposed action.	
Treadway, Roy	No expansion of oil terminals in Grays Harbor. Please protect our waters, air, land,and people from further pollution.
Response: Comment acknowledged.	
Treat, Lynne	While I have many concerns about the ambitions of Big Oil and Big Coal in WA State, I am currently focusing on the matter of the endangerment of the public health of Washingtonians. First of all I have great concern for the lack of safety involved in routine shipments, including secure containment of shipment products and adherence to regulations. The disrepair of our infrastructure is well-known. It includes the declining quality of our current oil train and coal cars, as well as documented methane leakages. Secondly, I am deeply concerned about the frequency of severe oil train accidents, derailments, and even fatalities--as well as severe injuries to innocent citizens-- due to coal train explosions. With the present lack of safety regulation compliance, we in WA State risk

Commenter Name	Comment
	the incidence of one or more tragedies in the proportions of the fatal Lac Megantic (Quebec) disaster. Emergency response resources are very limited in the smaller--more rural-- towns through which the coal trains regularly travel. It is very ironic to see these companies sell their proposed project as a "job creator" and an "asset to the state's economy." In truth, their plan appears to involve sucking out the last bit of fossil fuel on the earth, with no concern for the very great harm they are doing to the entire world. Those alleged "hundreds of jobs" will not be here in another 20 years. There will be no gold watch reward for job longevity at the time their employment has ended. As the petroleum industry continues to drain the earth's resources, real entrepreneurs will find true and lasting business opportunities in the renewable energy economy--an already strong contributor to the American economy. Clearly, the future is with renewable energy. The coming generation already knows this.
Response: Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.	
Trei, PK	I grew up in Washington and love it....thats why I dont want to see the horror of the Exxon blowout, creating a nightmare in the gulf for who knows how long. Its only a matter of time before Big Oil dumps a load in the sound! NO OIL TRANSPORT...GET WISE
Response: Comment acknowledged.	
Trejo, Catherine	As a native Pacific Coaster, I have traveled our beautiful West Coast for over 50 years. Please don't endanger the land, sea and wildlife that thrive in these pristine environments! Thanks for reading my letter.
Response: Comment acknowledged.	
Trent, Sharon	Oil is going out as a fuel, anyway. It will be sooner than we think. There is no use to kowtow to those who just want to profit from us. We should put our focus on cooperating with new sources of clean energy. And our trees , the luxuriant wealth of them, the clean air, are what makes our state special among all the states in the Union. In the long run, our environment brings a healthy balance so that our children can know what a forest is like- what really tall trees are. To bring in all the big dinosaurs associated with the oil companies- would be inviting the camel to put his nose in the tent. You know that story? A Bedouin in the desert was sorry for his camel, out in the cold. He said, ' His nose must be so cold' and he just let him put his nose in. Pretty soon, you guessed it, the camel had the tent and the man was out!! If you want a beautiful state, or country, at all, and if you want a healthy one, you Must protect it, up front and not be weak or play dumb when these threats occur. Thank you for standing up to the oil industry.. No matter what.
Response: Comment acknowledged.	
Trettner, Janet	I strongly urge you to NOT support the oil terminals proposed for Gray Harbor, and to similarly reject building more infrastructure to support the fossil fuel industry. By its very nature the fossil fuel industry is a hazard to our health and our environment through both the burning of fossil fuels and the potential for catastrophic events. We are on the cusp of future fueled by clean renewable energy. Washington state has been a leader to the rest of the country in this regard. Enabling the fossil fuel industry to continue and expand seems to be in direct conflict with Washington's otherwise laudable efforts. I urge you to keep your focus on clean, renewable energy and to reject enabling the continuance of fossil fuels. Thank you.
Response: Comment acknowledged.	
Tri, C	Please see beyond the momentary economic advantage to the probable future disaster. Stop this
Response: Comment acknowledged.	
Trippet, Will	now we see the real reason why you were cool with letting go keystone xl- its because you have an even worse plan B hiding behind it. Why are you unable to think conceptually? Its the principle the public objects to- so stop running back to redraw backu
Response: Comment acknowledged.	
Troland, Mary	Oil transport is a very bad idea for the environment and the people it affects.
Response: Comment acknowledged.	
Troll, Laura	Keep it in the ground is best for the US, best for the planet. The sooner we get really serious about alternative enrgy sources, the better for everyone.
Response: Comment acknowledged.	

Commenter Name	Comment
Trotsky, Matthew	Transporting oil like this is not worth the risk.
Response: Comment acknowledged.	
Trotter, S.	Fossil fuels...get you coming or going. THE USA MUST END ITS SUPPORT OF FOSSIL FUELS AND CREATE ALTERNATIVE ENERGY TECHNOLOGIES.
Response: Comment acknowledged.	
Troutman, Stephen	The madness of Keystone XL was put to bed. It is not time to replace it with some other madness of the same type.
Response: Comment acknowledged.	
Trover, Larry	Thank you for your time and actions to stop this assault on our environment.
Response: Comment acknowledged.	
Truong, Thanh	I understand very well ,why the law has no place for who of honesty .It's clearly ,they are standing strong sides faction have many dollar .do not for this exist Thank you
Response: Comment acknowledged.	
Truschel, Ms. Truschel	This isn't about more oil; it's about MORE OIL SPILLS!
Response: Comment acknowledged.	
Trutter, AL	We need clean energy in this country, not dirty and dangerous transport of crude oil!
Response: Comment acknowledged.	
Tsao, Fritz	Fossil fuels have no future in this world. Start the change now. Thank you.
Response: Comment acknowledged.	
Tsien, Wendy	The days of bowing to big oil are over. We know the future of life on this planet requires all of us to change to a much less energy-intensive way of daily living. The harmful effects of using fossil fuels are well-known and the use of these fuels in larg
Response: Comment acknowledged.	
Tuck, JT	No expansion of oil transport!
Response: Comment acknowledged.	
Tucker, Michael	It is very simple. Big oil has lied repeatedly. And when there is an accident we have had to sue them to clean up. They have proven them self's untrustworthy. Because of their past actions, I can not in support big oil in any way.
Response: Comment acknowledged.	
Tuomey, Ann Ellen	Dangerous and destructive--not what we want.
Response: Comment acknowledged.	
Turgeon, Denise	Thank you for reading my letter. Let's put people before profit.
Response: Comment acknowledged.	
Turken, Donald	Alternatives for our massive energy useage have been needed for many decades, so let us expand, rapidly on what has been done.
Response: Comment acknowledged.	
Turner, Bernadine	We need to phase out dirty fuels, not expand their distribution.
Response: Comment acknowledged.	
Turner, Doris	This is neither practical nor safe.
Response: Comment acknowledged.	
Turner, Gregory	Please say NO to using Grays Harbor as a crude oil export terminal. The risks to the communities and environment are not worth any gains the oil companies may make, and their safety and environmental track records are abysmal.

Commenter Name	Comment
Response: Comment acknowledged.	
Turner, Martha	Thank you for reading my letter. Please stop these terminals and protect our wataers
Response: Comment acknowledged.	
Turner, Robert	Dear Sirs: Please consider scrapping plans to locate this toxic industry in Grays Harbor (or anywhere else in Washington). The damage to ecology and human health are not worth whatever economic benefits might be gained up front. The state will end up paying for the disasters that could occur, and for the health problems in the community that this industry spawns. Thank you - Robert K. Turner
Response: Refer to the Master Response for Liability and Responsibility for Incidents.	
Tuttle, Rick	The KXL was just the beginning. We need to limit the venues of petroleum distribution across the nation if we are to have any appreciable reduction in the pollution from oil spills of all causes.
Response: Comment acknowledged.	
Twitmyer, Jane	We need to keep it in the ground, not ship it all over the world
Response: Comment acknowledged.	
Tyndall, Carl	Please do something about this. Thank you for reading my letter.
Response: Comment acknowledged.	
Ukockis, Ann	After all the harm the oil industry has done, we are supposed to trust that there will be no harm done in the NW? Are we really that greedy - or stupid?
Response: Comment acknowledged.	
Ulmer, Willard	As a former Clallam Co. resident, I hate the thought of the terminals.
Response: Comment acknowledged.	
Unfried, Amy	This plan of exporting crude oil via export terminals on the Washington coast is very bad. It will not be good for the health and even the economies of the many areas involved. Please stand up to the oil industry and stop this very harmful plan. Thank
Response: Comment acknowledged.	
Unfried, Steve	Transporting oil by rail is too dangerous. Stop this project now.
Response: Comment acknowledged.	
Unger, James	It's disgusting: with ALL the major politicians, like Obama and Hillary, "all in" on fracking and natural gas, they're going crazy on a new national distribution (pipelines) system (when we really need the Nation's electrical grid updated). WORSE, THEIR DIRTY LITTLE SECRET, COURTESY OF BIG CARBON, IS THAT THEY WANT THE U.S.A. TO BECOME THE BIGGEST NATURAL GAS EXPORTER TO THE REST OF THE WORLD, courtesy of fracking! THAT'S WHY THEY'RE LINING UP GAS TERMINALS IN THE GULF, NOT TO MENTION PLACES LIKE TH CHESAPEAKE BAY AREA! We need to forget about fracking, and BIG Oil, Big Gas, and Big Coal, and go fully-renewables pronto, AND IT CAN BE READILY DONE. Got to thesolutionsproject.org/ to see what your own State is doing and could/should be doing. The total changeover could be completed by 2030 if we have the political will, plus there will be a net yield of 2,000,000 new well-paying jobs! Why not? The worse thing about fracking, aside from contaminating so, so much water, is that fracking wells leak enormous amounts of methane which, when compared to other greenhouse (causing) gases, makes CO2 look like fresh air! Methane is a much more destructive, climate changing gas! It's time to get rid of Big Carbon's latest "get rich quick" schemes, and invest in & build infrastructure that is carbon-free, renewable, and opens our society up to a "cause no harm" future, for U.S., orur future generations, and The World. Please sign to stop (more of) the insanity!:
Response: Comment acknowledged.	
Uransky, Gayna	Thank you for reading my letter.NO TO THE TTP
Response: Comment acknowledged.	
Urban, Carol	Please help our future generations to live a life not dependent on oil.
Response:	
Urro, Frank	Our focus should be on expanding our use of renewables and using that expansion to create good, clean, healthy, American jobs.

Commenter Name	Comment
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Urso, Barbara J	Don't mess the country. Find a better solution.
Response: Comment acknowledged.	
V., Linda	Grow a spine and protect Americans. STOP Big Oil greed.
Response: Comment acknowledged.	
Valade, Jerry	To expand oil transport in Washington State is to guaranty spills and increase in pollution in Washington. At minimum, oil companies must be required to put up a bond to fully cover the cost of a major spill.
Response: Comment acknowledged.	
Valdez Klein, Teresa	Grays Harbor is close to my heart and I would hate to see it be sacrificed to this national dependence on oil. We need to get off the sauce and find a more sustainable way to live.
Response: Comment acknowledged.	
Valdez, Patricia	This is scary and dangerous. It will not help the region financially and is just another way to to exploit the interest of local people. These are precious wild life habitats that need protection. Patricia Valdez
Response: Comment acknowledged.	
Valente, Donna	Stop putting our planet at risk to make a profit. Enough is enough!!!
Response: Comment acknowledged.	
Valiente, Thalia	As a citizen of this country, I would like it to be preserved, kept beautiful and clean.
Response: Comment acknowledged.	
Van Aken, Richard	Fossil fuels are the past the sooner this is accepted the better off we'll be. No new infrastructure, no more leases on public lands, no new pipelines and no further expansion of rail shipments is what's needed not more of the same.
Response: Comment acknowledged.	
Van Brocklin, Karen	Please help Washington's beauty instead of taking the risk of hazardous oil, oil spills and pollution. Washingtonians love our state and nature, it will harm our BEAUTIFUL Emerald state, cause sickness to animals and wildlife which I believe like so many
Response: Comment acknowledged.	
Van Der Hout, Jackie	Respect indigenous sovereignty on both ends of this oil process. The extraction and the site of shipping in Gray's Harbor are both posing threats to indigenous people's treaty rights to their historical and traditional means of subsistence. Here in Washin
Response: Comment acknowledged.	
Van Dorn, Carolyn	Please keep in mind how much damage will be done to Washington's fishing, tourism/recreation, and other export industries if the oil trains come to town.
Response: Comment acknowledged.	
Van Sickle, Leigh	Stop this madness now. Protect our environment instead of actively harming it.
Response: Comment acknowledged.	
Van Steenwyk, Delores	Thank you for reading my letter. We only want to protect our communities, we have already seen what can happen.
Response: Comment acknowledged.	
Van Sunder, Maria Isabel	We need to keep our environment healthy for us and for future generations.
Response: Comment acknowledged.	
Van West, Rein And Jan	Now that we have the technology to invest in the future w/clean and renewable technology, why would we do otherwise? Please consider investing in public health and the health of our one planet that sustains us. Thank you for reading my letter. Rein and J
Response: Comment acknowledged.	

Commenter Name	Comment
Van Wicklen, Betty J.	the only way we can avoid the worst of climate changes is to leave all fossil fuels in the ground. If we do this, there will be no danger from these bombs on rails!
Response: Comment acknowledged.	
Vanabrahams, Ron	Increasing capacities for processing fossil rules is the wrong approach... we must put our energies and money into developing renewable energy sources... for our sake and for our kids sake.
Response: Comment acknowledged.	
Vanacore, Eric	En notre Γme et conscience. En notre arme la conscience, Signez ou partagez, SVP. Merci ! In our soul and conscience. With our weapon the Conscience... Sign or share ! Please. Thank You !!!
Response: Comment acknowledged.	
Vanadore, Leathea	Thank you for reading my letter. We truly do not need these terminals to transport fossil fuels. We need clean, renewable sources of energy. Time is running out for our planet.
Response: Comment acknowledged.	
Vance, Patricia	We don't NEED fossil fuel. We NEED sustainable energy-wind/solar/water.
Response: Comment acknowledged.	
Vandegrift, Christena	I send this message in high hopes that the leaders and individuals of power will stop to critically think about the well-being of our planets future, our oceans, our environments, and the creatures that reside within. Money from oil transport is not what
Response: Comment acknowledged.	
Vandenbush, Shannon	The debatable "benefits" offered by these destructive proposals are not worth the risk to the ocean environment, wildlife, or public health and safety. The projects have the potential to destroy our existing shellfish, fishing, tourism based economy and to upend our community's ability to attract green, sustainable business. Please do not override a community's right to self determination. I join with EarthJustice to ask that you decide not to advance these proposals in any form.
Response: Comment acknowledged.	
Vander Meulen, Gretchen	Thank you for reading my letter. As you know, a letter from one citizen represents the voices of many. Please oppose crude oil transport and seek more environmentally safe ways to access sources of energy for the good of all people and the planet!!
Response: Comment acknowledged.	
Vanderzee, Susan	Thank you for reading my letter. It may seem like a great money-making project to sell oil and gas around the world, but the price will be a habitable planet for our children and grandchildren. It is a very shortsighted people who sells their children's b
Response: Comment acknowledged.	
Vandever, Pastor Larry	It's time to think about the ecology and not the might buck.
Response: Comment acknowledged.	
Vandiver, John	With the deplorable safety record and inadequate maintenance of existing rail lines and cars, it is criminal to attempt to increase toxic oil transport through WA state.
Response: Comment acknowledged.	
Vanhorn, Barbara	Thank you for reading my letter. Please act before it is too late.
Response: Comment acknowledged.	
Varnum, David	This is an accident waiting to happen.
Response: Comment acknowledged.	
Vaudiau, Jeanne	Thank you for reading my letter. Help stop the destruction of our country for a few dollars. Preserve our nation for the future and present generations.
Response: Comment acknowledged.	
Vaughn, Jeffrey	No more oil transport, please. The industry has proven that they're not reliable.
Response: Comment acknowledged.	

Commenter Name	Comment
Vazull, A	Thank you for reading my letter.please considetate.
Response: Comment acknowledged.	
Vazzano, Susan	Sinkholes spills fumes, and dangerous rr crossings, people can not be safe.
Response: Comment acknowledged.	
Veits, Peter	I demand that all oil company executives be ritually sacrificed to Satan. Thank you.
Response: Comment acknowledged.	
Velardes, Cinda	Please hear the voice of the people. Do not let money and greed be your guide. Revelation in the Bible makes this promise that the Creator is going to bring to ruin those ruining the earth.
Response: Comment acknowledged.	
Vena, Skip	Stop this now!!
Response: Comment acknowledged.	
Vent, Mahina	Omg please this earth is dying on behalf of our arrogance and greed! Please it's time to help Restore and heal all! For ALL!
Response: Comment acknowledged.	
Vernon, Christine	American people do not want this country to suffer another catastrophe like the BP oil spill in the Gulf, among other disasters. Alternate energy sources will free us from our dependence on fossil fuel and better for the environment. Those new sources of energy will create new jobs and those new sources don't come with the risk for environmental damage. We are getting there but it is slow going.
Response: Comment acknowledged.	
Vesey, Robin	The chance of a spill is too high to allow the transport of crude oil through the NW with it's pristine forests, waterways, and our communities.
Response: Comment acknowledged.	
Vesque, Gunda	Keep the State of Washington free of oil transports, maybe even oil shipped in by vessel.
Response: Comment acknowledged.	
Vetter, Steve	Opt of the fossil fuel delivery system!
Response: Comment acknowledged.	
Via, E. Jane	Building oil shipping terminals is a short term solution to a long term problem. We must look to new and different ways which are more ecologically sound to meet our energy needs. Please oppose additional oil transport terminals.
Response: Comment acknowledged.	
Victoria, Celeste	Please stop transporting and expanding oil transport. We need to focus on sustainable energy that is less harmful like solar and wind. thank you.
Response: Comment acknowledged.	
Victour, Patricia	Exploding trains, leaking pipelines, and American oil heading overseas, leaving us with the clean-up bill. That aside, fossil fuels need to stay in the ground, here and abroad, if we are going to save our planet!
Response: Comment acknowledged.	
Vidal, Francine	Thank you for reading my letter. YOU MUST STOP ALL INTRUSION WITH THESE DANGEROUS LARGE PIPES TRANSPORTING CRUDE OILS AND REMNANTS FROM FRACKING...ALL POISONOUS FOR THE MOTHER EARTH AND THE PEOPLE OF THIS COUNTRY. WAKE UP NOW !!!!!!!!!!
Response: Comment acknowledged.	
Vidaure, Georgia	Please make the right choice when it comes to our environment; ensure clean air, diverse wildlife and a beautiful planet for our children and grandchildren.
Response: Comment acknowledged.	
Videtto, Joseph	they will eventually get their way on some of these pipelines, but clearly the technology exists for cleaner energy, and we are ready to head in that direction now....
Response: Comment acknowledged.	

Commenter Name	Comment
Vidrine, Stephani	we need to shift to alternative energies and reduce reliance on gas and oil while preserving America's nature. You won't miss what you have until it's gone.
Response: Comment acknowledged.	
Vigliotti, Bob	Y We need to start caring for our children's future. Our legacy is a poor future for them.
Response: Comment acknowledged.	
Vignoli Jr, Paul	NO oil trains...PERIOD!
Response: Comment acknowledged.	
Villano, Stephen	Thank you for reading my letter. Let's use up their oil, retaining our own for when theirs runs out.
Response: Comment acknowledged.	
Villaume, Mary	We really need to take steps into the future for the health and safety of our children and all living creatures. This oil belongs in its created place, underground, doing no harm to anyone. Extracting and transporting oil is an activity of a previous para
Response: Comment acknowledged.	
Vinagre, Shayne	Washington has the chance to protect our resources from destruction - our wealth and health relies on our healthy ecosystem - once it is polluted there is no turning back.
Response: Comment acknowledged.	
Vincent, Lisa	Thank you for reading my letter. Please seriously consider the wellbeing of our planet and the health of our people and put a stop to this proposal to transport crude oil, far, etc. through the US, and keep it off of our oceans.
Response: Comment acknowledged.	
Vincent, Renee	STOP THE DANGEROUS EXPANSION OF OIL TRANSPORT IN WASHINGTON STATE!
Response: Comment acknowledged.	
Vinograd, Arlene	Protect our communties now? No oil drilling?
Response: Comment acknowledged.	
Vitko, Cynthia	Oil will eventually kill us all
Response: Comment acknowledged.	
Viveiros, George	Please stop the assault on the environment and our health.
Response: Comment acknowledged.	
Vleugels, Dennis	This is not necessary and we must preserve the natural environment for generations to come, as once you mess with it, it is lost forever!
Response: Comment acknowledged.	
Vogel, Steven	Greed for dirty and climate-changing fossil fuel is permanently destroying the traditional sacred lands of our Cree brothers and sisters in Canada. Don't allow it to destroy this beautiful corner of North America.
Response: Comment acknowledged.	
Voltz, Noreen	This would be a great relief and worth it in the long run!
Response: Comment acknowledged.	
Volz, Candace	ThThe oil industry won't make public the chemicals used to thin tar sands oil so that they can be transported thru pipelines, so first responders have no idea what they're dealing with when an oil train explodes or spills- our world and everything/ one in it is at risk. Please don't build these terminals!!
Response: Comment acknowledged.	
Von Huben, William	Preserve the future for our children and not line the pockets of the oil industry. Fossil Free Future!
Response: Comment acknowledged.	

Commenter Name	Comment
Von Tobel, Robert	Climate change will wipe out all life on the earth, and soon - not at the end of this century.
Response: Comment acknowledged.	
Vonn, S.	Stop The Dangerous Expansion Of Oil Transport In California!!
Response: Comment acknowledged.	
Voss, Skyler	Stop the permits.
Response: Comment acknowledged.	
Vought, Kimberley	The risk to the environment is far too great. In this age, crude oil is fast becoming obsolete, as cleaner alternatives increasingly become the clearly better option - for the economy, for the people, and especially for the environment. Now is the time when we must move forward and slow down all oil production. We must refrain from any move that would enable oil production - including the construction of these two export terminals in Washington. These terminals are two steps backward - steps that our fragile climate cannot afford. Not only would a spill cause significant, irreversible damage, but the trains transporting oil to the terminals see are highly volatile, risking the lives of all that live near the railways, as well as risking the environment through which these railways run. Please, stop the construction of these terminals! Let us move forward to clean energy; let us save ourselves from catastrophic climate change.
Response: Comment acknowledged.	
W, A	Don't need this. Efforts should be going to renewable, environmentally friendly resources. For the good of the entire world.
Response: Comment acknowledged.	
W, Jand	Thank you for reading my letter--now is the time to put right what has been wrong for a long time. If we don't take care of our land, water, and air now, it will be too late.
Response: Comment acknowledged.	
Wade, Frances	Now is the time to say ENOUGH. In the name of progress and profits, we have allowed the fossil fuel industry to pollute and destroy our home planet. Now is the time to stand firm and say KEEP IT IN THE GROUND.
Response: Comment acknowledged.	
Wadford, Sonny	Thank you for reading my letter. Now please do it.
Response: Comment acknowledged.	
Waetermans, Hygi	Leave the oil in the ground!
Response: Comment acknowledged.	
Wager, Linda	Let's preserve the land. Just because money can be made off it doesn't make it alright.
Response: Comment acknowledged.	
Wagner, Eleanor	We must put the health of our planet and its people ahead of profits by leaving oil in the ground and developing renewable energy NOW.
Response: Comment acknowledged.	
Wagner, Ryan	This isn't in our interest. Stop using eminent domain and subsidies for these private interests as if they were public interests.
Response: Comment acknowledged.	
Wajda, Brian	You've destroyed our planet long enough! Oil's time is over, embrace new forms of clean energy.
Response: Comment acknowledged.	
Waldschmidt, Susan	Please reject the proposed oil terminals and help protect the environment and we who depend on it.
Response: Comment acknowledged.	
Walker, Brenda	stop messing up our land and waterways.
Response: Comment acknowledged.	

Commenter Name	Comment
Walker, Carol	These trains carrying oil are dangerous; they are known for explosions! Our environment cannot take more harm and these spills and loads of carbon pollution would be putting the health of communities and oceans at risk. Stop this now!!
Response: Comment acknowledged.	
Walker, George	I live next to a railroad, and see mile-long oil-tanker trains frequently. I am one accident away from losing my home, if not my life. We (the people) do not benefit from this!
Response: Comment acknowledged.	
Walker, Jennifer	The risks are just too great.
Response: Comment acknowledged.	
Walker, Jenny	Thank you for reading my letter. It is time we looked beyond profit margins into the future of our environment and our health. These oil transport schemes do not help us at all and put us (and the planet) at increased risk. The time to act was yesterday -
Response: Comment acknowledged.	
Walker, John	Haven't we done enough harm to our environment. A huge spill is inevitable.
Response: Comment acknowledged.	
Walker, Lynn	Wind and solar energy are where it's at!
Response: Comment acknowledged.	
Walker, Sue	I oppose the big oil companies making our land a thoroughfare for crude oil transportation by rail and oil tanker. this could put the health and safety of our communities at risk for contamination and land & water devastation.
Response: Comment acknowledged.	
Wallace, Carolyn	Please protect my children!
Response: Comment acknowledged.	
Wallace, Donald	In addition, your decision will encourage other communities throughout North America to stand firm against the fossil fuel projects.
Response: Comment acknowledged.	
Wallace, Nancy	Now is the time to build towards renewable energy. Now is the time to turn away from greenhouse gases. Let's have Oregon help lead the way. T
Response: Comment acknowledged.	
Wallace, Tina	No more dirty transports
Response: Comment acknowledged.	
Waller, Rhoda	Thank you for reading my letter. The environmental risks are too great. These oil export terminals will not benefit our country.
Response: Comment acknowledged.	
Walls, Joanne	Thank you for reading my letter. As a former resident of Oregon, I watch events in the PNW with great interest. Keep it clean and beautiful, and healthful.
Response: Comment acknowledged.	
Walsh, Linda	We lived by a train that hauled oil, etc. Very scary!
Response: Comment acknowledged.	
Walsh, Margaret	Put our tax money into renewal energy. We need a future!
Response: Comment acknowledged.	
Waltuch, Debbie	Please stand up to the oil industry now, and slow the dangerous expansion of oil transport. Thank you for reading my letter. Debbie Waltuch
Response: Comment acknowledged.	
Wands, Judith	The people in the City of Hoquiam should not be exposed to this risk.

Commenter Name	Comment
Response: Comment acknowledged.	
Ward, Donna	SWITCH TO CLEAN ENERGY. FLORIDA LOVES SOLAR. VISIT KEY LARGO FLORIDA. SEE WHY PEOPLE DON'T WANT NATURE'S BEAUTY DESTROYED.
Response: Comment acknowledged.	
Warenz, Timothy	It is time that nations around the world move away from using fossil fuels that degrade the environment and pose numerous risks to the planet and quality of life we are able to enjoy. We should be moving in the opposite direction rather than to continue
Response: Comment acknowledged.	
Warner, Jonathan	We don't want your oil passing through Michigan.
Response: Comment acknowledged.	
Warren, Carol	Thank you for reading my letter. I live with 80 other senior citizens 50 yards from one of the railroad tracks slated to carry crude in California. There are two elementary schools within three blocks. If there were an accident, nothing could save any of
Response: Comment acknowledged.	
Warren, Donnalynn	Thank you for reading my letter. Please stop transporting oil across roadways.
Response: Comment acknowledged.	
Warren, Kay	Thank you for reading my letter. No expansion of crude oil transport by rail & oil tanker. Two terminals are proposed for Grays Habor, WA. Absolutely NO!!!!!!!!!!!!!!!
Response: Comment acknowledged.	
Warren-sams, Barbara	Until the oil companies have safe vehicles for transportation, they should not even consider transporting oil through Oregon companies!
Response: Comment acknowledged.	
Warwick, Shannon	This is an accident waiting to happen. Please stop this proposal!
Response: Comment acknowledged.	
Wasielewski, Alison	Stop our oil addiction entirely, and save us from inevitable oil disasters!
Response: Comment acknowledged.	
Wasko, Larry	Do what's right!!
Response: Comment acknowledged.	
Wasserman, Kurt	The risk to our citizens is immense; our Congress needs to act in order to protect our communities. The governance of big corporations and the richest 0.1% must come to an end.
Response: Comment acknowledged.	
Watchempino, Laura	Now is the time to protect our future and place our reliance on renewable energy sources, not dirty fossil fuels like Bakken crude and Canadian tar sands.
Response: Comment acknowledged.	
Waters, Ainsley Skye	Please do the right thing!!
Response: Comment acknowledged.	
Waters, Anthony	Aren't we as a species intelligent enough not to let one of the most dangerous substances on the planet to contaminate our air, water, and land... to the point of destroying life as we know it? Yes, we are. Fossil fuels are not the only source of energy
Response: Comment acknowledged.	
Watkins, Ronnie	We have a chance to stand up to the oil industry now and slow the dangerous expansion of oil transport;increased crude oil rail traffic, oil spills and carbon pollution. The proposed oil shipping terminals; the explosive, dangerous oil trains needed to feed them; and the continual parade of oil tankers and barges taking the crude over thriving marine waters would put the health and safety of

Commenter Name	Comment
	communities, the local economy, tribal culture, and our ocean and coastlines at risk. This is not the future we want. We must go GREEN and save ourselves and our planet.
Response: Comment acknowledged.	
Watson Sr., Charles	there are so many other cleaner solutions to our energy problems,for instance electric,solar, wind.. Burning coal and compressing the gases produces almost pure gasoline. Calcium carbide when water is added produces acetylene gas. Aluminum carbide with wat
Response: Incomplete comment.	
Watson, Kevin	Oil is not the future. A smooth transition to the energy sources that will be after oil is depleted has to begin now. No further development of the fossil fuel trade. Please. Kevin
Response: Comment acknowledged.	
Watson, Marcia	Time to get into sustainable energy sources!
Response: Comment acknowledged.	
Wattson Lamb, Elsie	Thank you for reading my letter. Now, it is well past time for us to STOP the transportation of oil by rail and oil tanker. Indeed, it is most important to pull back on all excessive/unnecessary use of oil, period. But barring that happening in the near term, we must not transport oil in ways dangerous to the environment and to communities. Do not in any way support the expansion of dangerous oil transport: Stop the building of terminals in Washington (Grays Harbor, e.g.).
Response: Comment acknowledged.	
Wayland, Barbara	We have a coal port just across the US/Canadian border and the coal dust is everywhere. Cannot imagine the effects of a crude oil spill. Please, it is time to support other forms of energy and leave the coal and oil in the ground.
Response: Comment acknowledged.	
Weant, Nancy	Thank you for reading my letter. We now know that carbon pollution is affecting our cognitive ability to make decisions so it should be a no-brainer when it comes to standing up to the tyrannical oil industry. What about caring about our future, our child
Response: Comment acknowledged.	
Weaver, Gary	One word Renewables.....
Response: Comment acknowledged.	
Weaver, Sandra	We cannot continue to destroy our planet and humanity; there is another way
Response: Comment acknowledged.	
Webb, Esther	No oil or coal trains in my beautiful state.
Response: Comment acknowledged.	
Webb, Jo Ann	This is to save your childrens lives
Response: Comment acknowledged.	
Weber, Dorothy	Thank you for reading my letter. It is our duty as Christians to always protect the beautiful God given environment of the USA. These projects will endanger it.
Response: Comment acknowledged.	
Wegner, Chris	Oil trains are traveling bombs. We don't need them coming through our state!
Response: Comment acknowledged.	
Wegrzyn, Margaret	Please put a brighter future for our planet before profits.
Response: Comment acknowledged.	
Wehrle, Douglas	Thank you for reading my letter. The Hudson River and estuary is an historic, scenic and economic legacy. Sending thousands of tanker trains along it's banks exposes this unique American treasure to untold potential harm.
Response: Comment acknowledged.	
Weibel, Carolyn	No more investment in the oil beast. We need to move on with our technological revolution. Stop worshiping the war-mongering beast.

Commenter Name	Comment
Response: Comment acknowledged.	
Weidner, M.D., Faith	'Prevention is worth a pound of cure'; don't set up a system that has a high probablity of fouling Grays Harbor.
Response: Comment acknowledged.	
Weil, Janet	My extended family lives in the Pacfic Northwest. This remarkably beautiful region needs to be protected from crude oil rail and tanker traffic! We need a new economy based on renewable energy.
Response: Comment acknowledged.	
Weimer, Margaret	We must get away from these destructive policies and we don't have a future to decide this.
Response: Comment acknowledged.	
Weinstein, James Modiano	Oil on rail is a disaster waiting to happen. Derailments are inevitable as we have seen. And besides, climate change demands that we move away from fossil fuels. I encourage you to take that step.
Response: Comment acknowledged.	
Weir, Tom And Kristi	Oil rail traffic poses health and safety risks as well as contributing to carbon emissions. Stop this dangerous build up on oil transport.
Response: Comment acknowledged.	
Weis, Karen	Please please please, place our irreplaceable environment over corporate profit.
Response: Comment acknowledged.	
Weisman, Lammy	IT IS LONG PAST TIME TO BEGIN SHUTTING DOWN CRUDE OIL TRANSPORT AND TO BEGIN THE SWITCHOVER TO CLEAN, GREEN RENEWABLE ENERGY SOURCES. Thank you for reading my letter.
Response: Comment acknowledged.	
Weiss, Marjorie	NO MORE OIL TRAINS TTHROUGH WASHINGTON STATE FOR EXPORTING OIL. OUR RAIL LINES ARE NOT SAFE FOR THIS.
Response: Comment acknowledged.	
Weissberg, Melissa	Please do the right here
Response: Comment acknowledged.	
Weissberg, Melissa	Please to the right thing here
Response: Comment acknowledged.	
Welch, Lynn	Oil transport is just too dangerous It poses the very real risk of substantial damage to surrounding communities as well as environmental damage. The industry has not taken measures to increase the safety of surrounding communities that it will impact in
Response: Incomplete comment.	
Welch, Paul	I support total environmental study and transparency. I don't want OIL issues and spills. More traffic spells more problems.
Response: Comment acknowledged.	
Welch, Susan	Thank you for reading my letter. I alternativesencourage the country to focus on non oil
Response: Comment acknowledged.	
Wellin, Paul	The proposed oil shipping termials in Grays harbor Washington represents profiteering for mercenary corporations, but represents a grave threat to the health and safety of communities, the local economy, tribal culture, our oceans, and our coastlines.
Response: Comment acknowledged.	
Wells, Patrice	Stand up to the gas and oil industry!
Response: Comment acknowledged.	
Wersinger, Gary	Thank you for reading my letter. We should be fighting climate change, not adding to it.

Commenter Name	Comment
Response: Comment acknowledged.	
Wesner, Jerry	Keystone XL has been defeated; let's make this a trend.
Response: Comment acknowledged.	
West, Amaranth	The oil industry is one of the leading causes of climate change today, and the world has already seen how dangerous oil spills can be. We desperately need to cut our dependency on fossil fuels, not as a state or a nation, but as a species.
Response: Comment acknowledged.	
West, Elizabeth	Thank you for reading my letter. these greedy profiteers have got to understand that this country is not here for their sole benefit. No more fossil fuels. Period.
Response: Comment acknowledged.	
West, Kevin	What do you "public servants" not get about protecting your constituents? Enough shilling for big oil at the expense of the American people and our environment. Thank you for reading my letter.
Response: Comment acknowledged.	
West, Robert	The very last thing we need to promote in the state of Washington is an influx of 100-tanker-car trains of volatile crude oil that will endanger every town that they roll through with a very real possibility of a disastrous explosion and fire, especially when most of these citys are just not prepared for such a catastrophic occurrence
Response: Comment acknowledged.	
Wetherell, Karen	Add to all the dangers, the unwillingness of the railroads to disclose what, when and where they are transporting this oil and you have a recipe for real disaster! Thank you for reading my letter.
Response: Comment acknowledged.	
Whaley, Michele	This is the best place on the planet to live. I was born here. Don't bring this mess here.
Response: Comment acknowledged.	
Wheat, Polly	Again, the risks are too high to allow this project to continue when we have not yet taken necessary steps for the SAFE transportation of oil within our country--a step necessary for ANY consideration of this project.
Response: Comment acknowledged.	
Wheeler, Janet	I currently live in Arizona, but I'm seriously contemplating moving to the Northwest with Washington state as my first choice. As a future resident, I would expect this state to protect my family's and the environment's health and welfare. Thank you for reading my letter.
Response: Comment acknowledged.	
Wherrit, Thamar	We're supposed to be weaning from fossil fuels. Remember?
Response: Comment acknowledged.	
Whertley, Cynthia	Trains hauling crude oil is dangerous. Who in hell would allow it?
Response: Comment acknowledged.	
Whisenhunt, Rodney	After the numerous derailments and fires in the past few years of tankers transporting crude oil its become obvious that climate change isn't the only problem with fossil fuels. Even if the rail companies get their tracks up to the standards they should be, it will only be a matter of time before a landslide or sinkhole or some other mishap near a populated area kills and reeks havoc as another derailment takes place. We need to be weaning ourselves off carbon based fuels, not making it easier and more profitable for the gas and oil industry to keep pushing their destructive products on the market.
Response: Comment acknowledged.	
White, Beulah	We understand the risks we face with these oil industry proposals, and we don't think they are worth it. The oil industry should not be shipping volatile Bakken crude and toxic tar sands from Canada by rail through any community -- increasing the risk of an oil spill, fire, or explosion and exporting global warming harm. Oil companies want to turn our country into a thoroughfare for

Commenter Name	Comment
	crude oil transportation by rail and oil tanker at our expense. This is unacceptable. I call on you to protect our country from increased crude oil rail traffic, oil spills, and carbon pollution. Thank you. Thank you.
Response: Comment acknowledged.	
White, Chris	planet before profit leave it in the ground Thank you for reading my letter.
Response: Comment acknowledged.	
White, Dave	Oil transport is dangerous, it's filthy dirty, and very costly. WE cannot continue to placate Big Oil and pad their pockets!
Response: Comment acknowledged.	
White, Denis	Those of us in Oregon will also be affected because of many connections to friends and relatives in Washington, and because we care deeply about our society's continuing harm to tribal treaty rights, as well as the collateral damage to the environment tha
Response: Refer to Draft EIS Section 3.12, *Tribal Resources,* and Section 4.7, *Impacts on Resources,* for descriptions of potential impacts that could result from the proposed action.	
White, Edwina	Sustainable energy is the only road to the future.
Response: Comment acknowledged.	
White, Joseph	As a resident near a major rail line I am deeply concerned at the increase of crude oil transport on the rails nearby.
Response: Comment acknowledged.	
White, Kay	Thank you for reading my letter. Please protect our land and people.
Response: Comment acknowledged.	
White, Yana	Please stop the dangerous oil operations, while it is still possible! EVERY ONE of us has s choice, I urge you, please make the right one. The devastation oil companies cause our planet - the only home we have - is irreversible but it CAN BE PREVENTED!
Response: Comment acknowledged.	
Whitecloud, Zen	No more!
Response: Comment acknowledged.	
Whitfield, Helen	Enough explosions! please stop trying to make money with all the evidence of lives lost. Thank you very much.
Response: Comment acknowledged.	
Whitman, Linnea	I've spent years working for an American Fortune 200 Petroleum Company and a Petroleum Service Company, but it does not take someone with my employment background to know and realize that the expansion of oil transport through our great nation is a dangerous and very, very stupid idea!
Response: Comment acknowledged.	
Whitmire, Donna	Thank you for reading my letter. We have seen the results when oil is transported. There have been oil spills, cargo boats wrecking, trains overturning, to name a few. We already are endangering not only human lives but nature around us.
Response: Comment acknowledged.	
Whitmore, Nancy	Thank you for reading my letter. There are other ways to meet our energy needs. We do not need to put our health and safety at risk in this way
Response: Comment acknowledged.	
Whitney Price, Heather	As our planet is buffeted by strange weather patterns, unusually strong storms, droughts and flooding and increasing air pollution, the last thing we humans should do is extract, transport and use more fossil fuel. The Grays Harbor terminals' expected impact of more oil spills (almost guaranteed to happen eventually), damage to local cultures and land areas, and escalating climate change are among the reasons hot to build the terminals. I don't live anywhere near the Bakken area, Grays Harbor, or anywhere in between, and I am still appalled at the proposed terminals. Listen to what is already known about the expected impacts, and do not allow them to be built.

Commenter Name	Comment
Response: Comment acknowledged.	
Whitney, Shirley	Thank you for reading my letter. I hope you will act in accordance with our request.
Response: Comment acknowledged.	
Whitson, Helene	Leave Washington State alone! Just look at what the Exxon Valdez did to Alaska. We don't need oil terminals in our coastal ports. We don't need oil trains, either. Hey, I have a good idea! Let's leave the oil in the ground and go green! Look at swit
Response: Incomplete comment.	
Whitt, Patricia	If I lived in Gray's Harbor, WA, I would not want two crude oil shipping terminals there. I would not like a steady stream of trains laden with explosive crude oil coming through my town. I would not want oil spills polluting the harbor, home of a thriving fishing industry. Thank you for reading my letter.
Response: Comment acknowledged.	
Whittle, Liberty	Building oil shipping terminals off the coast of Washington only benefits the oil companies. It does not bode well for indigenous people, citizens, animals on land or in the sea, and the environment itself. Look at what the tar sands have done to the envi
Response: Incomplete comment.	
Widmark, Anne	Thank you for reading my letter. This is a critical issue. The two proposed terminals for Grays Harbor must be stopped.
Response: Comment acknowledged.	
Wiechnick, Debby	Stop promoting oil as an energy source and focus on renewable energy sources such as solar and wind. Oil, if not contained and used properly, is horribly destructive and deadly to all life, land, water and air. No matter how safe you think it is being contained, you can't 100% guarantee that the oil will not somehow leak, spill, or get released into our environment. Concentrate on what is best in the long run for providing a healthy place for your family, children, friends and their children to live, prosper and thrive. Turn your greed for quick and dirty money and power into creating, developing and building renewable sources of energy that will have the least to no amount of potential and real environmental destruction. Take a stand and be a voice for cleaner energy resources. Others will join you. Protect our life and our planet. Planet Earth is the only place we can live on. We have no where else to go. If we pollute it, we all die. Thank you for reading my letter. Sincerely, Debby Wiechnick
Response: Comment acknowledged.	
Wiener, Linda	This scheme to build two unnecessary and dangerous terminals in Grays Harbor. Washington is a terrible idea. Animals, plants, people, Native Americans will all suffer from the inevitable spills. Huge oil company profits should not be the only value runni
Response: Incomplete comment.	
Wienert, John	Don't even think about such an environmentally irresponsible action.
Response: Comment acknowledged.	
Wieser, Janice	I volunteer at Grays Harbor National Wildlife Refuge. Do you have any idea the damage to the area and the shorebirds if this is allowed? It makes me sick to think of it.
Response: See Response to FL1-1.	
Wieser, Peter And Sheri	We have only one thing , that without any other, contributes to protecting the human race from extinction, and that is to protect our earth. If you do not take action to protect the earth ,...it WILL die, and we will die and all future generations will never to have been born. It is your responsibility! Peter Wieser Sheri Wieser
Response: Comment acknowledged.	
Wiesler, David	It's past time to get serious about keeping the oil in the ground and moving to renewable energy.
Response: Comment acknowledged.	
Wigard, Jay	We need to protect ourselves from disaster.
Response: Comment acknowledged.	

Commenter Name	Comment
Wigen, Connie	tHis would not be in the best interest of our country and our people..
Response: Comment acknowledged.	
Wight, Christine	It is time for equal access to renewable energy!
Response: Comment acknowledged.	
Wightman, Nancy	Leave it in the ground
Response: Comment acknowledged.	
Wilber, Stewart	Selling off our natural resources is a bad national security move as well as highly dangerous to the public in terms of transit risk and environmental impact.
Response: Comment acknowledged.	
Wilcken, G.	If the oil industry EVER asks for anything that is actually a good idea-- in fact, if they ever ask for anything that isn't simply a guaranteed disaster of disaters, I shall be quite surprised. So far in history, it seems they never have. Thank you for
Response: Comment acknowledged.	
Wilcox, James	Now is the time to transition from reliance on fossil fuels and their known health and environmental risks. The sooner, the better. Protection of the Grays Harbor estuary is paramount to a healthy community.
Response: Comment acknowledged.	
Wildeman, Glenda	Our oceans have had enough oil dumped into them. Stop this madness! Big oil seems determined to destroy the west coast of both the United States and Canada. We don't want it, and we don't need it! For shame!
Response: Comment acknowledged.	
Wildensee, Kristin	Please protect our land, waters and communities from dangerous oil trains. Additionally, please help protect our planet and the health and safety of all living beings by refusing to aid the export of Bakken crude and tar sands oil, dirty fuels that cause
Response: Comment acknowledged.	
Wiley, Gerri	Stand up for the people....for life...for Climate Justice!
Response: Comment acknowledged.	
Wiley, Kenneth	leave the oil in the ground and all the system that support it
Response: Comment acknowledged.	
Wilger, Micah	The Earth is already under enough strain from the usual wear and tear we enforce upon it. For the sake of justice for our planet, justice for our fellow creatures and justice for our fellow humans, I implore you to terminate this project.
Response: Comment acknowledged.	
Wilke, Susan	Thank you for reading my letter. We say we want to end global warming but we want to become a thoroughfare for crude oil transport. That is the OPPOSITE to what we say. Put our words into actions. We HAVE to change how we exist on this planet and has to change NOW.
Response: Comment acknowledged.	
Wilkes, Dave	Thank you for reading my letter.. Look up in the sky . there is the safest delivery system of energy that exist! It's called THE SUN! Get off of dirty energy! Invest in SOLAR
Response: Comment acknowledged.	
Wilkins, Diane	This is a very scary thing to think about. There is no way we will stand by and let this happen with out a fight. NOT HERE IN WASHINGTON STATE!!
Response: Comment acknowledged.	
Wilks, Andrew	Don't let dirty commerce destroy ourstate's marine resources.
Response: Comment acknowledged.	

Commenter Name	Comment
Will, John	Since 1980 I have been quite familiar with the Gray's Harbor area. To ignore it's ecological fragility is to blatently disregard it's nature and value. Thank you for reading my letter.
Response: Comment acknowledged.	
Willet, Zoe	Keep it in the ground and support solar and wind energy!
Response: Comment acknowledged.	
Willey Halpin, Wanda	For the welfare of our soil, oil must stay sequestered in the earth! It certainly should not be transported anywhere. Trains derail, trucks have accidents, and the damage lasts forever.
Response: Comment acknowledged.	
Williams Arnp, Jana	This plan is way too risky for the entire region. My husband is 68 and was born and grew up in Grays Harbor, I have been there many times and feel pretty familiar with the history and current issues involved with these proposals.
Response: Comment acknowledged.	
Williams, AD	Thank you for reading my letter. But consider the number of individuals who will benefit financially versus the vast numbers of people whose health and welfate will be put permanently at risk. All of these considerations should give you pause. Then there
Response: Incomplete comment.	
Williams, Christopher	Stop the pollution of big business, don't allow new drilling, new technology will make oil resources obsolete and unnecessary.
Response: Comment acknowledged.	
Williams, John	I do not like this at all.
Response: Comment acknowledged.	
Williams, Judd	Some good things become bad when we use too much of them. Petroleum was a good 20th century source for energy but the dregs they want to ship out to tidelands on railcars are not worth the costs to the people of America. No coal trains, no crude oil train
Response: Comment acknowledged.	
Williams, Mara	Thank you for reading my letter. We need to reduce fossil fuel use and move to renewable energy.
Response: Comment acknowledged.	
Williamson, Elizabeth	It's so not right to allow money to take precedence over human existence and liberty.
Response: Comment acknowledged.	
Willinger, Carol	Thank you for reading my letter. We only have one earth. Quit destroying it! What kind of planet do you want to leave your children?!? Stop this selfish greed!!!!!!
Response: Comment acknowledged.	
Willis, Edward	What I want to see is a safer transport method or the oil companies making sure what they are using is the safest thing on the road or in the water.
Response: Comment acknowledged.	
Willis, Frances	Haven't we already had enough oil spills whether by land or by sea!!
Response: Comment acknowledged.	
Willman, Hannah	Stop the oil!
Response: Comment acknowledged.	
Willson, Helene	The cost of transporting crude across our lands is just too great. Not only does it profit a few at the expense of the rest of us, it also makes us more dependent on outsiders for the jobs created by the need for these materials.
Response: Comment acknowledged.	
Wilson, James J. & Marie C.	Stop the polluters now! Thank you for reading my letter.
Response: Comment acknowledged.	

Commenter Name	Comment
Wilson, Kathy	Oil spills are NEVER cleaned up. The residue lasts forever. Don't take a chance on ruining forever pristine Grays Harbor.
Response: Comment acknowledged.	
Wilson, M	Dear Decision Makers, I pray for better decisions concerning fragile environment & pollution. Surely, there must be another solution. If there is so much oil in U.S. soil why need to build up shipping terminals when there are already designated terminal
Response: Comment acknowledged.	
Wilson, Rose Marie	Step back and just THINK about these proposals! Who, in their right mind, would want long trains of tanker cars filled with explosive fuel winding their way through the towns and countrysides of this nation, putting people and the environment in harm's w
Response: Comment acknowledged.	
Wilson, Thomas	What is causing our Climate to change? (Fossil fuels) Unprecedented' climate change creating drought, forest fires, flooding, and death. We must change the killing of earth, and its habitat. The ozone that protects us from UV rays is getting bigger. That along will kill all mankind. check out my website www.wpwpline.com
Response: Comment acknowledged.	
Wilson, Tonia	Thank you for reading my letter. First, it is ludicrous to support the fossil fuel industry when renewable energy resources ie: solar, wind, geothermal are the energy solutions we should be supporting. Secondly, considering the rail line disaster in Canada killing so many and destroying a town along with the derailment in North Dakota of the oil trains (thank goodness in the middle of nowhere) it is absurd to entertain the notion of terminals in Washington. Much more needs to be done to the rails, containers and our ports to ensure the safety and preservation of our environment.
Response: Comment acknowledged.	
Wilson, Wendy	Thanks for not building these two terminals.
Response: Comment acknowledged.	
Wilson, Winn	http://www.thepetitionsite.com/375/009/913/honor-cecil-ban-trophy-hunting-worldwide/
Response: Refer to the Master Response for Purpoe and Focus of the EIS.	
Wine, Robert	How many of you are going to drive your cars today? How many will use heat? How many will take a bus? How about a plane? We NEED oil, so grow up and realize it's a necessary thing. Actions such as these cause us to have to pay more and more for basic tra
Response: Incomplete submission.	
Wineland, Larry	Thank you for reading my letter. We need to have more refineries, and we need to tell Canada to refine it's own oil.
Response: Comment acknowledged.	
Wingerd, Mala	We don't need filthy fuel or products anymore. There are much better options...Please stop fouling our Earth for profit! Thank you for reading my letter.
Response: Comment acknowledged.	
Wirrig, Susan	Spend state money on sustainable alternative sources of energy, not supporting the fossil fuel industry!
Response: Comment acknowledged.	
Wirth, Mark	This would be a disaster. Please vote against this proposal.
Response: Comment acknowledged.	
Wise Smith, Sue	Thank you for reading my letter. It is time, to move forward into the future with renewable energy.
Response: Comment acknowledged.	
Wise, Barbara	Why do this to primarily benefit Canada and China at great environmental cost to the U.S.? NO, NO, NO!!!!
Response: Comment acknowledged.	
Wise, Margaret	We need to control our dangerous ways before it's too late.
Response: Comment acknowledged.	

Commenter Name	Comment
Wiseman, Jerry	No more ruined ecosystems, leave it in the ground.
Response: Comment acknowledged.	
Witmer, Bob	There comes a point in time where we have to say enough is enough. We know how fossil fuels are killing the planet; further expansion of the fossil fuel industry is insane. Quit sacrificing our environment for money.
Response: Comment acknowledged.	
Wogan, Steve	Two things: Keep our oil HERE, and don't risk the inevitable spills. There are plenty of other ways to make disgusting profits...
Response: Comment acknowledged.	
Wohlsein, Brigita	i don't want to be in the blast zone
Response: Comment acknowledged.	
Wolf, Debbie	Thank you for reading my letter. Please focus on green solutions for our energy needs.
Response: Comment acknowledged.	
Wolf, Janette	We're already guilty of harming the Earth in irreparable ways. Let's consider future generations rather than current financial gain and say no to the negative effects of crude by rail.
Response: Comment acknowledged.	
Wolf, Nancy	Thank you for reading my letter. I believe the protection of our natural world is of utmost importance, and that we can find a better way to meet our energy needs.
Response: Comment acknowledged.	
Wolfe, Elizabeth	Idaho is too great to let this be a corridor to fossil fuels.
Response: Comment acknowledged.	
Woll, Ann	Risking all so that oil can be shipped through US ports benefits only the oil companies to the detriment of the US citizens and our environment. We need to protect the majority, not the ambition for profit of a couple of major oil companies.
Response: Comment acknowledged.	
Wolslager, Paula	Stop killing America!
Response: Comment acknowledged.	
Woltz, Susan	Please, please protect our waters for us all - and more importantly, the creatures who live there.
Response: Comment acknowledged.	
Wood, Barbara	STOP THE DANGEROUS EXPANSION OF OIL TRANSPORT IN YOUR STATE!
Response: Comment acknowledged.	
Wood, Joanne	Thank you for reading my letter. I am oppose to the crude oil pipeline crossing my state and most certainly the great Mississippi! That is a disaster waiting to happen and it would ruin the life blood of the Midwest! NO to that pipeline! Not now not ever
Response: Comment acknowledged.	
Wood, Martha	No oil port in our state--or any other place,for that matter.We have got to kick the habit!
Response: Comment acknowledged.	
Wood, Suzanne	I remember the days when the air was fresh and clean, when we could safely breathe the air, and trains were to transport people and products from coast to coast. Now, our food is poisoned with toxic chemicals, the air we breathe is contaminated, the wate
Response: Comment acknowledged.	
Woodfield, Joy	It is ironic that governments (both local and federal) do not prioritize shoring up our infrastructures (especially our highways), but freely give the go ahead to heavy transport of oil. We cannot afford to take this step. It endangers our environment, o
Response: Comment acknowledged.	

Commenter Name	Comment
Woods, James	We must work for solar and wind energy. It is going to come to that anyway so why not start now? Everyone knows the current fracking oil boom is greed stacked on greeed: A steal it now mentality. Knock it off please. You know, it's really not about God or America or unity or right vs. wrong or the flag and patriotism, It's about money, money, maney and nothing else. The oil industry will sell the country doen the river for money. They're doing it right now. Thank you for reading my letter.
Response: Comment acknowledged.	
Woodward, William	I don't want these dangerous trains coming through Idaho. I want clean energy alternatives to fossil fuels.
Response: Comment acknowledged.	
Woodward-rice, Claudia	Grays Harbor is completely unsuitable for oil terminals. The inevitable shipment of tar sands oil here IF the proposed terminals are built, would bring a permanent stench, destroy property values and bankrupt our county. And that's the positive outcome if no spills or explosions happen in the meantime.
Response: Comment acknowledged.	
Worley, Gail	Keep Oil Transport Safe for People!
Response: Comment acknowledged.	
Wright, Donna	our planet is already dying.....a slowwww tortured way....us humans are the devil to the animals,forests,parks....everything God created....lets be less of the devil....stop destroying our world...leave something for our grandkids
Response: Comment acknowledged.	
Wright, John	Thank you for reading my letter. It almost kills me that my beautiful Greys Harbor, which I lived at for many years could be turned into a toxic waste dump site.
Response: Comment acknowledged.	
Wright, Katherine	Best course of action: Keep It In The Ground!
Response: Comment acknowledged.	
Wright, Rebecca	This is an accident waiting to happen - all in the name of big money.
Response: Comment acknowledged.	
Wyatt, Wendy	Thank you for reading my letter. #TIME4CleanEnergy #DrainingEarth's #Oil cause #MostSeriousCrimes Against #Humanity Including tbe #Right2HealthEcosystem for #FutureGenerationsMatter - #StopTheSelfishOilKings NOW!
Response: Comment acknowledged.	
Wykowski, Mike	Stop the two terminals proposed for Grays Harbor, Washington, and protect our communities from increased crude oil rail traffic, oil spills, and carbon pollution. Thank you for reading my letter.
Response: Comment acknowledged.	
Wyman, Carolyn	We should not be risking such hazardous pollution in our state for fossil fuels that cannot be used for energy without polluting the environment. Our focus needs to be on alternative fuel sources...why accommodate transporting of such filthy fuels?
Response: Comment acknowledged.	
Wyndham, John	The fossil fuel industry must wind DOWN, not increase its infrastructure. Stop building ports for oil transport and pipelines for fracked gas. Turn to renewable energy sources and SAVE OUR PLANET! Thank you for reading my letter.
Response: Comment acknowledged.	
Wyse, Margo	STOP DESTROYING OUR HOME....PLANET EARTH!!!!!
Response: Comment acknowledged.	
Yarbrough, Michelle	The Pacific Northwest, one of the last truly beautiful places remaining in our country...
Response: Comment acknowledged.	

Commenter Name	Comment
Yarkin, P.	For profit railroads, sold to private equity pirates, is the reason why we have this problem. Anything that is for-profit kills people.
Response:	
Yates, Noel	Thank you for reading my letter. Indeed, this is not the path to the future which will sustain our economy or our environment.
Response: Comment acknowledged.	
Yefsky, Sonja	Thank you for reading my letter. Too much risk to the environment to take a chance .
Response: Comment acknowledged.	
Yen, Jeannette	Even more importantly, we need to modify our attitudes and lifestyle to be less greedy and consume less of our resources. As we've said before: Halve it all!
Response: Comment acknowledged.	
Yhmoff, Chris	stop dirty oil industry....
Response: Comment acknowledged.	
Yoskowitz, Ken	It's time to bite the bullet and become very serious about reducing and supplanting our use of petroleum products.
Response: Comment acknowledged.	
Young, Dr Lih Young	WORK TO BE DONE; SOCIAL JUSTICE IN GREAT DANGER! (I). WORK TO BE DONE; SOCIAL JUSTICE IN GREAT DANGER!
Response: Comment acknowledged.	
Young, John	We must move forward to care for God's good creation.
Response: Comment acknowledged.	
Young, John	Thanks to the Eagle Ford shale play to the north of our local Port of Brownsville (next door to South Padre Island, TX) and the Burgos Basin shale play just across the Rio Grande from us, we'd be in danger of this stuff being brought to our Port by pipeline and rail. Just as ExxonMobil is being accused of knowing about and lying about the devastating damage of their operations to our human habitats around the world.
Response: Comment acknowledged.	
Young, Jonathan	NO selling U.S. oil overseas! This is an outrageous abuse of the U.S. consumer and destructive to the environment.
Response: Comment acknowledged.	
Young, Mary	Why should anyone or anyplace suffer to bring more profits to a dirty industry?
Response: Comment acknowledged.	
Young, Pat	Moving dirty oil and draining every last polluting drop of fossil fuels should not be our focus now. When we know better we should do better!. That is... unless you know of something other than air we can breathe and water we can drink! If so, please share!!!. Maybe Newt wants to live on the moon but not me!!
Response: Comment acknowledged.	
Young, Robin	Let's put a stop to this dangerous practice and focus on clean energy production. We have other options that will not threaten our health and environment.
Response: Comment acknowledged.	
Zaller, Robert	Leave the oil in the ground.
Response: Comment acknowledged.	
Zappa, Zoe	PLEASE HELP WITH THIS IMMEDIATLEY!! thank you, zoe
Response: Comment acknowledged.	
Zarafshon, Andijan	Hey canada and other dirty oil traders: stop pushing toxic crudes on us,no more! We demand clean energy only.Why can't you get off your rear end and produce renewable energy that should have been done a long time ago? No more excuses .
Response: Comment acknowledged.	

Commenter Name	Comment
Zatlukal, James	take creative action to get rid of coal and oil as sources of energy as long as it takes -for future generations.
Response: Comment acknowledged.	
Zawilinski, Karina	Thank you for reading my letter. Please consider the dangerous environmental implications of transporting crude oil.
Response: Comment acknowledged.	
Zee, Vici	Didn't we learn from Keystone XL? The American public do not want this! Listen!
Response: Comment acknowledged.	
Zeh, Janet	It is long past time to move beyond expanding dirty, unsafe fossil fuel energy to focus on clean, safe, renewable energy. The more we expand the former, the longer it will take to embrace and implement the latter, better option - the renewable energy of the future. Please protect the people and environment of Grays Harbor by not allowing the oil industry to build oil shipping terminals on the Northwest coast.
Response: Comment acknowledged.	
Zercher, Jack	there is no reason to export domestic oil while we are still importing over 20% of current use
Response: Comment acknowledged.	
Zerr, Laura	The Puget Sound is a delicate ecosystem that has already been over taxed. We can ill afford to have any mishaps nor deal with the heavy oil train traffic.
Response: Comment acknowledged.	
Zetting, Judith	I do not mind the transport , I DO MIND THE STATE OF THE RAILS,THE DESIGN OF CARRIERS, AND THE PAUCITY OF TRAINED EMPLOYEES !!!!!
Response: Comment acknowledged.	
Zielinski, Mary Ann	Let us NOT "sell out"/risk further environmental damage to feed/fuel the money-making greed of the oil industry! What happens in the State of Washington, ultimately affects ALL of us!!! Let us NOT contribute to our own extinction, any more than we already done. How many oil spills, damaging our waters, marine life, and posing health and economic (for instance, loss of livelihood to commercial fishermen) threats to humans, can we endure? How soon we forget the disasters, like the oil spill that devastated the Louisiana (and beyond) shoreline. STOP RISKING our health and our planet's viability for profiteering motives!
Response: Comment acknowledged.	
Zilles, Barbara	Let's stop the horrible disaster BEFORE it happens!
Response: Comment acknowledged.	
Zimmerman, Leda	There's too much dangerous, dirty crude moving through our country. Time to regulate for safety in a serious way.
Response: Comment acknowledged.	
Zimmerman, Paulette	I am totally opposed to using our shipping terminals on the west coast for oil transport. For the sake of the planet and the future of all species, including the human, oil needs to stay in the ground - period. Let's start the transition to renewables.
Response: Comment acknowledged.	
Zimmerman, Robert	Why should we weaken environmental laws to encourage fossil fuel use? Do we do that for solar and wind? Of course not. A "carbon tax" includes the cost of dealing with the environmental costs - lets take into account all of the true costs of fossil fuel
Response: Comment acknowledged.	
Zimmermann, Adele	MUCH OF THIS DIRTY OIL COMES FROM CANADA. THIS IS, IN EFFECT, AN INVASION OF OUR COUNTRY BY A FOREIGN POWER.
Response: Comment acknowledged.	
Zingher, Judith	Allowing these terminals will contribute to making the US a natural resource supplying Third World country. Don't do it!
Response: Comment acknowledged.	

Commenter Name	Comment
Zito, Frank	We humans, like all living beings, need clean air and clean water to live and thrive. Dirty Bakken crude and toxic tar sand oil feed our addiction to fossil fuels while endangering the clean water and air every human needs to survive.
Response: Comment acknowledged.	
Zoupas, Robbin	To the oil companies: Is there no end to your poisonous ideology of threatening the environment and peoples' health with your continued control of fossil fuels? In the best of situations, there is always the lurking danger communities face when things go wrong.-Robbin Zoupas
Response: Comment acknowledged.	
Zurakov, Michael	ALL new fossil-fuel infrastructure projects must be closely examined, as they lock us into decades more of increased use of these fuels. Thank you for reading my letter.
Response: Comment acknowledged.	

Table 7-10. Names Associated with Earth Justice Form Letter

A, M	A, Sen	A, Sherry	A., Nando	Aaron, Kris	Abatuno, Martha
Abbasparker, Ibn-umar	Abbot, Marrisha	Abbott, Alex	Abbott, Alice	Abbott, Ashlie	Abbott, Billie
Abbott, Bonnie	Abbott, Bruce	Abbott, Carol	Abbott, Doug	Abbott, Emily	Abbott, John
Abbott, Linda	Abbott, Louise	Abbott, Marina	Abbott, Neil	Abbring, Cyndi	Abdella, Joseph
Abdullah, Hasana	Abdulsabur, Jihad	Abecket, Suzanne	Abel, Chastity	Abel, Judith	Abelbeck, A.
Abell, Brenda	Abella, Olga	Abelleira-danie, Elisa	Aber, Thomas	Abercrombie, Harmony	Abicht, Cathy
Abidin, Michele	Abirached, Pamela	Able, Mary	Ablog, Heather	Abookire, Norma	Abouakar, Sarah
Abra, Keren	Abraham, Barbara	Abrahamson, Dennis	Abrahamson, Shawn	Abram, Natalie	Abram, Paul
Abrams, Dr. Karen	Abrams, Eric	Abrams, Gloria	Abrams, Jenny	Abrams, Jesse	Abrams, Nancy
Abrams, Sally	Abravanel, Eugene	Abrell, Sarah	Abrioux, Marie-laure	Abromaitis, Kay	Abshire, James
Accos, Deborah	Acebo, Ryan	Acevedo, Carolina	Acevedo, Dennis	Acheson, Nichole	Achey, Barbara
Achnitz, William	Achord, Arlene	Acker, Eugene	Ackerman, Andrea	Ackerman, Judilth	Ackerman, Matthew
Ackerman, Michael	Ackerman, Shelly	Ackerson, David	Ackhart, Joseph	Ackrill, Paul	Acopine, Nancy
Acord, Verlon	Acosta, Erika	Acosta, Richard	Acquino, Mary P.	Acree, Betty	Acreman, Caryn
Acuff, Jotham	Acuna, Becky	Acuna, Carina	Adair, Dan R	Adair, Michael	Adam, Cole
Adam, Jackie	Adam, Mary	Adamick, Frank	Adamkovich, Rosemary	Adams Parker, Jin	Adams, Alexander
Adams, Amy	Adams, Angela	Adams, Berk	Adams, Beth	Adams, Beverly	Adams, Bradley
Adams, Brett	Adams, Brynn	Adams, Carolyn	Adams, Electra	Adams, George	Adams, Harriet
Adams, James	Adams, John	Adams, Kim	Adams, Lauren	Adams, Lynn	Adams, Marci
Adams, Marge	Adams, Nikki	Adams, Reade	Adams, Robert	Adams, Sean	Adams, Suzanne
Adams, Thomas And Christine	Adams, Virginia	Adamski, Kathleen V	Adamson Curlis, Donna	Adamson, Deb	Adamson, Dr Mike
Adams-phipps, Asa	Adcock, David	Addington, Lynda	Addis, Andra	Addison, Juliana	Addison, Marcia
Ade, Daniel	Aderhold, Steven	Adesso, Rick	Adib, Frank	Adkins, Danielle	Adkins, Louise
Adkins, Mikki	Adkins, Ruby	Adkisson, Mary	Adler, Ashley	Adler, Deborah	Adler, Matt
Adler, Robert	Adler, Stephen	Adler, Steve	Adler, Tal	Adlin, Lily & Nelson	Adochio, RJ
Adolay, Barbara	Adomavich, Judy	Adrian, Jan	Adrian, Stephanie	Adrian, Trevor	Adsen, Joanne
Affigne, Suzanne	Affleck, Carol	Affleck, Nancy	Affolter, Angie	Afreen, Amna	Agacinski, Karen
Agar, Robert	Agee, Chris	Agema, Dianne	Agerbak, Linda	Agliata, Gary	Agnello, Sal
Agnew, Gordon	Agostinho, Elizabeth	Agren, Jane	Agriopoulos, Danielle	Agro, Joan	Agsten, Leroy
Aguda, Miriam	Ague, Kate	Ague-kennedy, Janet	Aguilar, David	Aguilar, Francisco	Aguilar, Magdalena
Aguilar, Stephanie	Aguilar, Uriel	Aguillard, Jonci	Aguiluz, Ricardo	Aguirre, Austin	Aguirre, Guillermina
Aguirre, Mixtli	Aguirre, Nicki	Ah Park, Chung	Ahearn, Jim	Aherne, Deborah	Ahlers, Deborah
Ahlert, Lisa	Ahlstrand, Heidi Lynn	Ahmad, Hinna	Ahmad, Meriam	Ahmed, Abdul-aleem	Ahmed, Ayesha
Ahmed, Ehsan	Ahmed, Faizy	Aho Barnett, Sonya	Ahrens, Amy	Ahrens, Gerry	Ahrens, Holly
Ahrens, Jane	Ahumada, Paula	Aichele, Ella	Aiello, Kathleen	Aige, Mar	Aikawa-olin, Kim
Aiken, Edwin	Ailill, Dane	Aina, Katherine	Ainsley, Brian	Airth, Evangeline	Aist, Mary

Aitken, Trisha	Aiudi, Bethany	Aja, Rosemary	Ajello, Laura	Ajemian, Peter	Ajercik, Stephen M
Akand Karan, Ashni	Akasha, R	Akbar, Grace	Ake, Diane	Akemon, Scott	Akers, Martha C.
Akileswaran, Vaidyanathan	Akinyemi, Babatunde	Akom, Denise	Al Mutawakel, Maggie	Aladeen, Donna	Alagammai, Andrea
Alandete, Laura	Alanen, Dennis	Alaniva, Lori	Alarcon, Ana	Alasti, Aryt	Albanese, Deborah
Alberico, Tony	Albert, Harrison	Albert, Henry	Albert, Laura	Albert, Marty	Albert, Robert
Albertin, Julia	Albertine, G.	Alberts, Allison	Albertsen, Jennifer	Albertson, Patricia	Albrand, Julia
Albrecht, Kathryn	Albrecht, Lonnie	Albrecht, Peter	Albrecht, Tina	Albright, Gary	Albright, Marilyn
Albright, Shai	Albro, Nancy	Albu, Andrea	Albus, Anne	Alcantar, Jill	Alcazar, Jane
Alces, Eileen	Alcock, Denis	Alcock, John	Alcombright, Patty	Alcott, Russell	Alden, Alyssa
Alden, Diane	Alden, Rory	Alderdice, David	Alderman, Lisa	Aldrich, Jim	Aldridge, Bruce
Aldridge, Thomas	Aleep, Marc	Alegado, Joe	Alegre, Lauren	Alejandro, Ashley	Alessi, Ann M
Alexakos, Irene	Alexander, Allan	Alexander, Ben	Alexander, Charles	Alexander, Charles	Alexander, Cole
Alexander, Eugene D.	Alexander, Gina	Alexander, Gunta	Alexander, Jane	Alexander, Jennifer	Alexander, Jim
Alexander, Jonathon	Alexander, Kathleen	Alexander, Mary	Alexander, Meredith	Alexander, Michael	Alexander, Michael
Alexander, Michael	Alexander, Nancy	Alexander, Rita	Alexander, Sue	Alexander, Virginia	Alexanderson, Diane
Alexandre, Charlotte	Alfano, Joseph	Alfaro, Elaine	Alfaro, Jose	Alfieri, Paul	Alfimow, Beverly
Alfinito, Tina	Alford, Gail	Algarin, Kathy	Algasso, Joann	Alger, Karen	Ali, Genevieve
Ali, Ibrahim	Ali, Onaiza	Alibrandi, Jill	Alic, Margaret	Alicea, Erika	Alicea, Yamilet
Alimpic, Mick	Alimpich, Albert	Alison, Cheryl	Alizo, Katherine	Allain, Dora	Allan, Chris
Allan, Inez	Allan, Jeannette	Allan, Jessica	Allan, Linda	Allan, Mccluer	Allara, David
Allard, Cheri	Allbee, Dwight	Allbee, Greg	Allbright, Sharon	Allebach, Richard	Allen, Andrea K
Allen, Anne	Allen, August	Allen, Barbara	Allen, Benjamin	Allen, Catherine	Allen, Dakota
Allen, David	Allen, David	Allen, Deb	Allen, Dennis	Allen, Dominique	Allen, Donna
Allen, Edwina	Allen, Elise	Allen, Elise	Allen, Fran	Allen, James	Allen, James
Allen, Jeanette	Allen, Jeffrey	Allen, Judith	Allen, Kambra	Allen, Kari	Allen, Linda
Allen, Loren	Allen, Lynn	Allen, Margaret	Allen, Mary	Allen, Mary	Allen, Meaghan
Allen, Melissa	Allen, Michael	Allen, Patricia	Allen, Paul	Allen, Peggy	Allen, Richard
Allen, Ridwaana	Allen, Robin	Allen, Rosemarie	Allen, Seth	Allen, Sherry	Allen, Sheryl
Allen, SO	Allen, Sundra	Allen, Susan	Allen, Susan	Allen, Travis	Allen, Wanda
Allende, Lois	Allende, Margaret	Allendorf, Brandon	Alleniii, Doug	Allenson, Doug	Alles, Susan
Allgood, Jean	Allington, David	Allington, Robert	Allison, Connie	Allison, Deborah	Allison, Donna
Allison, Jackie	Allison, Julia	Allison, Keith	Allison, Kelly	Allison, Shoshanna	Allmaras, Paula
Allmond, Linda	Allocca, Michaelangelo	Alloway, Sharon	Allsup, Romalda	Allyn, Jim	Allyn, Tim
Almazan, Valerie	Almeida, Katie	Almeidaaltamirano, Gabriela	Almendarez, Mary	Almodovar, Robert	Almond, Dino
Almond, Janet	Almquist, Kate	Alon, Jan-paul	Aloni Midreshet, Irith	Alonso, Cynthia	Alonso, Shelley
Alonzo, Lisa	Alourdas, Dianna	Alpers, Nancy	Alpiste, Jennifer	Al-qadi, Carolyn	Alrutz, Peter
Alsafi, Catherine	Alsen, Ray	Alsina, Sandy	Al-sofi, Joy	Alspaugh, Kristen	Alstrum, James
Alt, James	Altamirano, Victoria	Altar, Kristin	Altenburg, Kim	Alter, Marian	Alter, Marleen
Altintop, Carrie	Altman, Barbara	Altman, Michael	Altman, Penny	Altman, Peter	Altorfer, Barbaralynn
Altschaft, Sharla	Altschul, Frank	Al-tukhaim, Mary Jo	Alvarado, Jose	Alvarez Fernandez, Eddy	Alvarez, Charles
Alvarez, David	Alvarez, Eddie	Alvarez, Isabelle	Alvarez, Vanessa	Alverson, David	Alves, Micheline
Alvord, Annie	Amador, Nicole	Amalfitano, Diane	Aman, Jacqueline	Amande, Kiah	Amarante, Jason
Amarelo, David	Amato, Dino	Amato, Dolores	Amato, Julie	Amato, Nancy	Amato, Rita
Amaya, Catalina	Amaya, Marcela	Amberger, Briana	Amberger, Kate	Ambrose, Melissa	Ambuske, Denise
A-mccoy, Deniz	Amdahl, Erv	Amel, Dean	Amendola, Joseph	Amendolari, Michele	Ament, Don
Ament, Susan	Amerman, Mary	Amerman, Robert	Ames, Donald	Ames, Julie	Ames, Justin
Ames, Karin	Ames, Karyn	Ames, Paul	Ames, Scott	Ames-curtis, Juli	Amigon, G
Amini, Donna	Amisano, Christine	Amitano, Lorrie	Ammann, Jennifer	Ammarell, Gene	Ammon, Cara
Ammon, J	Amoroso, Amy	Amos, Jerry	Amos, Sean	Ampeliotis, Ruth	Amrod, David
Amsler, Guy	Amtower, Lisa	Amundson, Beret	Amundson, Gail	Anastasio, Laura	Anastasiya, Nozhenko
Anastos, James	Anaya, Andrea	Anazagasti, Robert	Anbar, Robin	Ancelwisner, Annette	Ancker, Robert
Anctil, Chris	Anctil, Devin	Anderholm, Jon	Anders, Catherined	Andersen, Danica	Andersen, Derek
Andersen, Evette	Andersen, Janis	Andersen, Kirsten	Andersen, Kristen	Andersen, Patricia	Andersen, Peggy
Andersen, Vikke	Andershock, William	Anderson, Aaron	Anderson, Amy	Anderson, Angela	Anderson, Arlene

Anderson, Benjamin	Anderson, Bernice	Anderson, Brian	Anderson, Bruce	Anderson, Candy	Anderson, Carol
Anderson, Catherine	Anderson, Cindy	Anderson, Dan	Anderson, Dave	Anderson, David	Anderson, Debby
Anderson, Dennis	Anderson, Dina	Anderson, Dorothy	Anderson, Dorothy	Anderson, Edna	Anderson, Eileen
Anderson, Elaine	Anderson, Eleanor	Anderson, Elizabeth	Anderson, Eva	Anderson, Gary	Anderson, Glen
Anderson, Glen	Anderson, Helen	Anderson, Jackie	Anderson, James	Anderson, Janie	Anderson, Jeffery
Anderson, Jessica	Anderson, Jessica	Anderson, Joan	Anderson, Jolie	Anderson, Julie	Anderson, Karen
Anderson, Karen	Anderson, Karen	Anderson, Karen	Anderson, Karin	Anderson, Kathy	Anderson, Keith
Anderson, Kelly	Anderson, Kelly	Anderson, Kevin	Anderson, Kevin	Anderson, Kirsten	Anderson, Kristina
Anderson, Laurel	Anderson, Lauretta	Anderson, LD	Anderson, Linda	Anderson, Linda	Anderson, Lorena
Anderson, Marilyn	Anderson, Marit	Anderson, Marketa	Anderson, Martha	Anderson, Matthew	Anderson, Maurica
Anderson, Megan	Anderson, Michael D.	Anderson, Michelle	Anderson, Monica	Anderson, Nicole	Anderson, Patricia
Anderson, Richita	Anderson, Riley	Anderson, Rob	Anderson, Robert	Anderson, Robert	Anderson, Robert
Anderson, Ron	Anderson, Rosanne M.	Anderson, Ruth	Anderson, Sandy	Anderson, Scott	Anderson, Sharon
Anderson, Shelley	Anderson, Sylvia	Anderson, Tiffany	Anderson, Veronica	Andersongarrity, Kevin	Andersonmiles, Eleanor
Anderssen, Saliane	Andersson, Ben Oscar	Andeway, Kathy	Andrade, Elma	Andrade, Paul	Andrade, Stacy
Andre, Elisabeth	Andreas, Leticia	Andreatta, Susan	Andreo, Jacalyn	Andretta, Jeaneen	Andrews, Amanda
Andrews, Becky	Andrews, Charles	Andrews, Colleen	Andrews, D	Andrews, Denis	Andrews, Duncan
Andrews, Geneva	Andrews, Gordon G.	Andrews, Jeffrey	Andrews, Jerri	Andrews, Lee	Andrews, Lisa
Andrews, Marcia	Andrews, Mark	Andrews, Mary Lou	Andrews, Patricia	Andrews, Rita	Andrews, Robert
Andrewsmellouise, Tracy	Andric, Eileen	Andring, Patricia	Andromidas, Jorge	Andros, Charles Frederic	Andruski, Stephen
Andruss, Peter	Andruss, Sally	Andrychowski, Steven	Andryshak, Alara	Andujar, Julio	Anel, Lora
Anepete, Vanessa	Anestis, DK	Angel, Amber	Angel, Beverly	Angel, Beverly	Angelino, Paul
Angell, J.L.	Angell, Lynnette	Angell, Phil	Angell, Richard	Angella, Phyllis	Angellerickson, Jimmye
Angelovich, Nancy	Angelus, Joshua	Anger, Barbara	Angerer, James	Angert, Philip	Angleberger, Joyce
Anglin, Joann	Angot, Michel	Angotti, Kathleen	Angowski, Carol	Anguiano, Jackie	Angulo, Leslie
Angus, Russell	Anicker, Diane	Ankelman, Michael	Anker, Roger	Ankiel, Summer	Ankli, Gene
Ann, Tina	Annecone, Lisa	Annon, Sisika	Ansbro, Michael	Ansel, Cecilia	Anselmo, Allison
Anshus, Alex	Ansley, Sierra	Anspach, Barbara	Anthis, L. Jim	Anthonisen, Margot	Anthony, Amanda
Anthony, Carol	Anthony, Jocelyn G T	Anthony, Judy	Anthony, Kristin	Anthony, Mary	Anthony, Stephan
Antillon, Juan	Antiques, Horseshoecoins And	Antle, Jessi	Antoine, Herve	Antoine, Wendy	Anton, Gloria
Anton, Kathleen	Anton, Mark	Antone, Linda	Antonelli, Chaz	Antoniewicz, Susan	Antony, Ronald
Antrobus, Grace	Antuna, Martin	Anundsen, Kristin	Apach, Chapa	Apfel, Sarah	Apgar, Ms. Sherry
Apking, Elizabeth	Apley, Janet	Apo, Christopher	Apodaca, Linda	Apone, James	Aponte, Ana
Aponte, Rachel	Apostle, Robert	Appel, Alan	Appel, Maryanne	Appel, Wendy	Appelbaum, Barbara
Appell, Joseph	Appell, Stephen	Appenzeller, Cary	Apple, Ronald	Applebaum, Doris	Applebaum, Karen
Applebaum, Robert	Applefield, Katie	Appleford, Alan	Applegate, Clara	Applegate, Tim	Appleman, Luisa
Appleman, Tara	Appleton, Joseph	Applewhite, Joann	Apps, Darryl	Aprile, Kathy	Apt, Barbara
Aquiningoc, Steve	Aquino, Tracey	Arace, Marylucia	Aradeon, Susan	Aragon, Maria	Araiza, Adalberto
Aram, Susaan	Arana, Hugo	Arana, Josefa	Aranita, Rosita	Aranovsky, Eugenia	Arapoudis, Sandra
Arata, Susan	Araujo, Isabel	Arbak, Kathleen	Arbess, Saul	Arbogast, Audrey	Arbogast, Karen S.
Arbour, Carole	Arceo, Aimee	Archambault, Caitlin	Archer, Beverly	Archer, Vicki	Archibald, Gerry
Arconti, Ken	Ardison, Laurie	Ardoin, Karen	Arellano, Andrew	Arena, Robyn	Arenburg, Christine
Arend, Debra	Argenta, C Kent	Argento, Michael	Argo, Allison	Arguetty, Danny	Argyropoulos, Chris
Ariani, Kade	Arias, Jorge R.	Arikawe, Margie	Arioli, Doug	Arion, Mason	Ariza, Natalia
Arkley, Alfred & Harriet	Arledge, Mary	Arlette, Joan	Armendarez, Elisabeth	Armendariz, Brandon	Armendariz, Fred
Armens, Karl	Armenta, Lyssa	Armenteros, Clara	Armentrout, Harley	Armerding, Christopher	Armigo, Victoria
Armijo, Francisco	Armijo, Salme	Armillas, Mercedes	Armin, Andrea	Armington, Katy	Armistead, Melinda
Armistead, Susan	Armitage, Chris	Armitage, Maureen	Armm, Edward	Armolt, Melvin	Armond, Christine
Armour, Bruce	Armour, Kelly	Armstrong, April	Armstrong, Audrey	Armstrong, Christin	Armstrong, Dessi
Armstrong, Gertrude	Armstrong, Jameka	Armstrong, Jennifer	Armstrong, Johnny	Armstrong, Jude	Armstrong, Leslie
Armstrong, Marcellus	Armstrong, Sara	Armstrong, William	Arnal, Diane	Arndt, Robert	Arneberg, James
Arneson, Peter	Arnett, Roberta	Arney, Jennifer	Arnold, Alan	Arnold, Benjamin	Arnold, Carl
Arnold, Carlos	Arnold, Carmen	Arnold, Charles	Arnold, Cynthia	Arnold, David	Arnold, Dwight

Arnold, James	Arnold, Jennifer	Arnold, Jessica	Arnold, Keith	Arnold, Sally	Arnold, Suzanne J
Arnold, Tina	Arnoldsen, Barbara	Arnone, Dominic	Arnone, K.	Arns, Harold	Arntson, Mark
Aroha, Leona	Aron, Evelyn	Aron, Sissy	Aronoff, Miriam	Aronow, Myra	Aronowitz, Barbara
Aronowitz-fusco, Judi	Aronson, E	Aronson, Henrietta	Aronson, Julie	Aronson, Reevyn	Arosarena, Oneida
Arpante, Suzanne	Arquette, Peggy	Arquilla, Vance	Arrabaca, Andrew	Arrajj, Marcus	Arredondo, Nicole
Arredondo, Rudy	Arreguin, Martha	Arreola, Lucero	Arrington, Karen	Arrowwood, Sylvia	Arroyo, Eric J.
Arroyo, Susan	Arscott, Stacey	Arslani, Dee	Arsons, Georgean	Arthur Iv, Richard	Arthur, Cheryl
Arthur, LA	Arthur, Mike	Arthur, Molly	Artle, Thomas	Artz, Lynn	Arumugham, Vinu
Arvidson, Robert	Arvola, Andarin	Ary, Sheila	Aryeh, George	Arzayus, Maria E	Asberry-whitt, Diana
Asbury, Carol	Asbury, Terry	Asch, Jeff	Aschenbrenner, Stanley	Ascher, Lisa	Ascott, Madeleine
Asencio, Susan	Ash, Michelle	Ash, Rose	Ashbey, Lucinda	Ashby, Brendan	Ashby, Milton
Ashcraft, James	Asher, Donna	Asher, Louis	Ashley, Claudette	Ashley, David	Ashley, Mark
Ashley, Tamara	Ashleyhollinger, Mika	Ashman, Charles	Ashmore, Sandra	Ashton, Debra	Ashton, Linda
Ashurst, Diana	Ashworth, Linda	Ashworth, William	Askegard, Cecelia	Askew, Angela	Askew, David
Asmann, Carol	Asmussen, Craig	Asoian, Eileen	Astalos, Andrew	Asturino, Frank	Asumen, Harlisa
Aswell, Lois	At Vincent, Stella	Atcheson, Sandra	Aten, Alan	Atencio, Melyssa	Ater, Dan
Athavale, A	Atherton, John	Atkin, Eugene	Atkins, Bettye	Atkins, ED	Atkins, Sandra
Atkinson, Brett	Atkinson, Catherine	Atkinson, Chuck	Atkinson, Renee	Atlas, Debra	Attri, Sean
Atwood, Barb	Aubertin, Gerald	Audas, Elizabeth	Audette, Jarryd	Auer, Patricia	Auerbach, Delayne
Aughey, Arlene	Augustine, Dawn	Augusto Lozano, Jose	Augustus, Nicholas	Augustus, Saundra	Augustyniak, Kathryn
Auilar, Jasmine	Aul, Greta	Aulgur, John	Aultman, Reynolds	Auman, Holly	Auman, Rick
Aune, Rebecca	Aupperlee, Jessica	Aureli, Anna	Aurigemma, Kaye	Ausfahl, Karen	Aust, Amanda
Austen, Dorothy	Auster, Virginia	Austin, Adrienne	Austin, Barbara	Austin, Carl	Austin, Christine
Austin, Gregory	Austin, Karen	Austin, Lynda	Austin, Michelle	Austin-buss, Linda	Austria, Sharon
Autry, Anne	Avallone, Lorraine	Avedisian, Tracy	Avedon, David	Avellino, Samantha	Avello, Dawn
Aveni, Sharon	Averett, Amber	Averett, Anthony	Averitt, Frances	Averitt, William	Avery, Amanda
Avery, Bonnie	Avery, Judy	Avery, Thomas	Avila, Dayana	Aviles, Julio	Avilla, Nathan
Avins, Deborah	Axelrod, Andrea	Axelrod, Andrew	Axle, Mary	Axtellsmedley, Lauriel	Ayalin, Ellen P
Aye, Lobsang N.	Ayer, Kristin	Ayers, Charles	Ayers, Charles	Ayers, Randall	Aylard, Donavon
Aylsworth, Harold	Aylward, David	Aylward, Luke	Ayotte, C	Ayres, Peter	Ayyar, Adarsh
Azarian, Rosanne	Azman, Summer	Azoulay, Kalanit	Azpurua, Angelica	Azrate, Roberto	Azuh, Bernadette
B, C	B, Dennis	B, Greta	B, Hannah	B, J	B, Joyce
B, Julie	B, Michele	B, R	B, R	B, S	B, S
B, Sayles	B, Shanna	B, Susan	B., Bruce	B., Jill	B., N.
B., Olga	B., Reba	B., Sharon	Baab, Yvonne	Babbitt, Andrelene	Babcock, Gabriel
Babcock, Holly	Babcock, Rebekah	Babiak, Katherine	Babic, Joanne	Babich, Gail	Babicz, Paul
Babore, Patricia	Babrick, Jean	Babu, Shridhar	Baca, Marisa	Bacallao, Hector	Baccala, Joan
Baccarat, Tanya	Baccelli, M L	Bacci, Debra	Baccus, Dion	Bace, Lori	Bach, George
Bach, Jhana	Bach, Julie	Bacher, Neil	Bachman, Fritz	Bachman, James	Bachman, Renee
Bachmann, Karen	Bachner, Joann	Bachus, Kelly	Back, Karen	Back, Ramona	Backman, Lara
Backstrom, Ralph	Bacon, Carol	Bacon, Iii, Drury L.	Bacon, Verna	Bacso, Henrietta	Badagliacca, Justin
Badame, Sacha	Bader, Jessica	Bader, William	Badger, Ben	Badgett, Stacie	Badura, Nancy
Badus, Theresa	Badyrka, Jill	Bae, Tommy	Baeder, Nancy	Baer, Howard	Baer, Joel
Baesemann, Gerri	Bagar, Karen	Bagby, Mike	Baggett, Joseph	Baginski, Caroline	Bagley, Rob
Baglini, Sidne	Bagnoli, Gina	Bagwell, Carolyn	Bahl Montgomery, Nikhil	Bahn, Theodore	Bahr, Dennis
Bahri, Nour	Baier, Carol	Baier, Dawn	Baier, Mary Ann	Baierschmitt, Anne	Bailet, Rebecca
Bailey, Annette	Bailey, Brenda	Bailey, Bret	Bailey, Christina	Bailey, David	Bailey, David
Bailey, David	Bailey, Deborah	Bailey, Diane	Bailey, Jill	Bailey, Joan	Bailey, Jodi
Bailey, Kimberly	Bailey, Lee	Bailey, Linda	Bailey, Lisa	Bailey, Lydia	Bailey, Marcia
Bailey, Meredith	Bailey, Nathalie	Bailey, Norene	Bailey, Randall	Bailey, Robert	Bailey, Robert
Bailey, Roy	Bailey, Sharon	Bailey, Sharon	Bailey, Susan	Bailey, Sylvia	Bailey, Tina
Bailie, Janae	Bailis, Naomi	Bails, Kirk	Bain, Cifton	Bain, Thomas	Bain, William
Bainbridge, Mary-lynne	Bainchi Quota, Ann	Baines, Paula	Bains, Jeffrey	Bair, Russell	Baird, Andrew
Baird, Barbara	Baird, Barbara	Baird, Heidi	Baird, Lynne	Baker Gierlach, Marian	Baker, Arlene

Baker, Barb	Baker, Bill	Baker, Brenda	Baker, Byron	Baker, Curtis	Baker, Douglas
Baker, Dustin	Baker, Dyane	Baker, Frances	Baker, Frank	Baker, Janine	Baker, Jennifer
Baker, Joel	Baker, Jon	Baker, Kelsey	Baker, Kristin	Baker, Kristina	Baker, Leah
Baker, Lisa	Baker, Maria	Baker, Mary Ann	Baker, Mary Sue	Baker, Megan	Baker, Melanie
Baker, Michael	Baker, Mikal	Baker, Nelson	Baker, P	Baker, Patricia	Baker, Richard
Baker, Rodger	Baker, Sandy	Baker, Sara W.	Baker, Sharon	Baker, Stacia	Baker, Susan
Baker, Taylor	Baker, Tom	Baker-clark, Carolyn	Bakerpoe, Jacqueline	Baker-smith, Gerritt And Elizabeth	Bakker, Clara
Bakker, Gary	Bakker, Robin	Bakko, Theresa	Bakr, Rania	Bala, Sheree	Balabanian, Jerry
Balas, Kathleen	Balassi, Nancy	Balch, Earl	Balch, Stephen	Balchen, Debra	Balczon, Melody
Baldan Badia, Nelly	Baldasio, Mike	Baldauf, Joyce	Balder, James	Baldhoff Leutkirch, Scarlett Isabella	Baldi, Melanie
Baldwin, Chris	Baldwin, Judith	Baldwin, Julia	Baldwin, Laura	Baldwin, Marilynn	Baldwin, Melissa
Baldwin, Michael	Baldwin, Tanya	Baldyga, Helena	Bales, Brenna	Balfour, Joan	Balfour, Michele
Balgaard, Diana	Balgemann, Elaine	Balish, June	Ball, Jennifer	Ball, JR	Ball, Kim
Ball, Michon	Ball, Pamela	Ball, Shannon	Ball, Tim	Balla, Sandi	Ballance, Jacquelyn
Balland, Jean-luc	Ballantine, Sherrie	Ballard, Brenda	Ballard, Clifford	Ballard, Cynthia	Ballard, Eleanor
Ballard, Janet	Ballard, Sarah	Ballard, Tom	Ballen, Ira	Ballenger, Brooks	Ballenger, Marie
Ballenger, Ted	Ballentine, Wanda S.	Balles, Katherin	Ballew, Louann	Ballewske, Christine	Balli, Karina Cecilia
Ballinger, Joshua	Ballinger, Regina	Ballo, Mark	Ballot, Eltonor	Ballot, Michael	Ballou, Carol
Ballou, Jeffrey	Balogh, Beth	Balogh, Daniel	Balsinger, Craig	Baltin, Brian	Baltz, Marcia
Balunek, Emma	Balzano, Donna	Balzer, Karen	Balzer, Sara	Bamford, Sharon	Bamford, Stephen
Banach, John	Bancu, Mihail	Bandeira, Sandra	Bander, Ellen	Bandola, Jodi	Banducci, Diana
Bane, James K	Bane, Karma	Banelis, Lewis	Banerjee, Pranab	Bangers, Ingrid	Banghart, Robert
Bangs, Leigh	Banisi, Frank	Bank, Tobias	Banks Jr, Henry	Banks, Hannah	Banks, Maureen
Banks, Percival	Banner, Cecilia	Bannerman, Lynne	Bannister, Susan	Bannon, Kevin	Banta, Loretta
Banton, Yvette	Baouche, Karen	Bar, David	Barack, Max	Baraini, Olimpia	Baran, Nicki
Barany, Catherine	Baratta, Jennifer	Barba, Jorge	Barbara, Casablanca	Barber, Arleen	Barber, Courtenay
Barber, Daniel	Barber, Dawn	Barber, Frances	Barber, Gayle	Barber, Jennifer	Barber, Jim
Barber, Jim	Barber, Rick	Barber, Terry	Barber, Virginia	Barberi, Lillyam	Barbieri, Lynn
Barbieri, Tina	Barbone, Shannon	Barbuto, Justine	Barca, Erin	Barcelo, Fred	Barchus, Leah
Barclay, Carrie	Barclay, Daniel	Barclay, Katelin	Barclay, Patricia	Barco, David	Barcott, Nick
Bard, Enzo	Bardell, Tim	Bare, Alan	Bare, RD	Barela, Dana	Barella, Frank
Barense, Diane	Bargen, Jan	Bargen, Ph.d., Donna Von	Barhoum, Tawfik	Barich, Sarah	Baringer, Steve
Bark, Thomas	Barker, Anne	Barker, Cina	Barker, Donald	Barker, Eileen	Barker, Howard
Barker, Julia	Barker, Kimberly	Barker, Leslee	Barker, Lisa	Barker, Loraine	Barker, Reginald
Barker, Sean	Barker, Tom	Barkin, Jennifer	Barkley, Dan	Barko, Erika	Barlas, Shahid
Barlow Hudson, Jon	Barlow, Lauren	Barlow, Scott	Barmack, Laura	Barmichael, Debra	Barnard, Brandon
Barnard, Michele L.	Barnes, Alan	Barnes, Alex	Barnes, Bob	Barnes, Christina	Barnes, Christy
Barnes, Deborah	Barnes, Doug	Barnes, Fred	Barnes, Hallie	Barnes, Howard	Barnes, Jeanne
Barnes, Joanne	Barnes, Kate	Barnes, Pat	Barnes, Patricia	Barnes, Patti	Barnes, Regina
Barnes, Richard	Barnes, Robert	Barnett, Barbara	Barnett, Betty	Barnett, Claire	Barnett, Dana
Barnett, David	Barnett, Gloria	Barnett, Kathy	Barnett, Michael	Barnett, Peter	Barnett, Sandra
Barneycampbell, Noenoe	Barnhart, Katherine	Barnhill, Cara	Barnwell, Robert	Baron, Andrew	Baron, Anise
Baron, Avrey	Baron, Dave	Baron, Samantha	Barondes, Lynda	Barone, Olivia	Barone, Sharon
Baroni, Cherie	Barr, Jean	Barr, Melody	Barr, Tammy	Barradas, Carlos	Barragan, Marguerite
Barragan, Roberta	Barrentine, Sarah	Barrera, Leo	Barrero, Erika	Barreto, Stanley	Barrett Zywan, Katherine
Barrett, Becky	Barrett, Ben	Barrett, Blaine	Barrett, Donna	Barrett, Donna	Barrett, Elizabeth
Barrett, Kathy	Barrett, Lisa	Barrett, Martha	Barrett, Nolen	Barrett, Susan	Barretto, Geri
Barrhollenberg, Kathleen	Barrie, Donald	Barriere, Maureen	Barringer, Debra	Barringer, Thomas	Barrington, James
Barrington, Sherry	Barrington, Tim	Barrios, Enzo	Barritt, Jim	Barron, Carla	Barron, Christa
Barron, Kelly	Barron, Lisa	Barron, Lynn	Barron, Mikail	Barron, Paula	Barron, Tiobe
Barrote, Erika	Barrow, Debra	Barrows, Patrick	Barrows, Steven	Barrrons, Susan	Barry, Beverly
Barry, Dana	Barry, Destiny	Barry, Dwight	Barry, Jim	Barry, Karyn	Barry, Lynda
Barry, Roland	Barry, Sue	Barry, Susan	Barry, Thomas	Barrymore, David	Barsel, Sara

Barstow, Ren	Bartell, Lee	Bartels, John	Bartenhagen, Tim	Bartes, Lili	Barth, Joline
Barthel, Alan	Barthelow, Marilyn	Bartholome, David	Bartholomew, Annie	Bartholomew, Carolyn	Bartholomew, Elizabeth
Bartholomew, Tessa	Bartilucci, P	Bartlett, J	Bartley, Kimberly	Barto, Patti	Bartoc, Anne
Bartoli, Sheri	Bartolone, Marisa	Bartolozzi Goldau, Serena	Barton, C.C.	Barton, Durk	Barton, Jacob
Barton, John	Barton, Judith	Barton, S	Barton, Sandra	Barton, Wendy	Bartz, Navarre
Baruch, Heidi	Barve, Purnima	Barzilay, Henry	Basgall, Carolyn	Bash, Marilyn	Basile, C
Basile, Camille	Basing, Sheila	Basinger, Jeffrey	Baskin, Harriet	Basler, Barbara	Basler, Cynthia
Basrai, Rashida	Bass, Catherine	Bass, Lanny	Bassat, Candace	Bassett, Art	Bassett, Cheryl
Bassett, Christine	Bassett, Jan	Bassis, Paul	Basson, Audrey	Bastian, Anne	Bastian, Carole
Bastian, Joseph	Baston, Roger	Bastron, Malcolm	Batcha, Nina	Batchelder, Candace	Batchelder, Patricia
Bateman, Guy	Bateman, Joseph	Bateman, Robert	Bates, Dena	Bates, James	Bates, Jean
Bates, Lauren	Bates, Melody	Bates, Michael	Bates, Richard	Bator, Loretta	Batova, Ayse
Batson, Jon	Battaglia, Alisa	Battaglia, Gail	Battaglia, Richard	Battaglio, Patty	Battan, C
Battat, Ben	Battersby, Meg	Battin, Sharlot	Battle, Dorothy	Battles, Nick	Batty, Vernon
Bauch, Gerhard	Baucom, Rolf	Baud, Annick	Bauder, William	Baudouin, Jacqueline	Bauer, David
Bauer, Elisabeth	Bauer, Ernst	Bauer, Gary	Bauer, Kelly	Bauer, Lani	Bauer, Melissa
Bauer, Sanda	Bauer, Stephanie	Bauer, Thomas	Bauereiss, Kurt	Bauerle, Sharon	Bauernfeind, Bill
Baughman, Charles	Bauknight, Rita	Baum, Bill	Bauman, Bernadette	Bauman, Joan-marie	Baumann, Bill
Baumann, MJ	Baumann, Scott	Baumgardner, Denise	Baumgarten, Felice	Baumgartner, William	Baumis, Donald
Baumjones, Elisabeth	Baures, Timothy	Bausano, Vincent	Bausola, Frank	Bautista, Melvin	Bautz, Dr.margaret
Bauwens, Greet	Baxter, Brent	Baxter, Martha	Baxter, Susan	Baxter, Taylor	Bayati, J.
Bayer, Judith	Bayer, Laura	Bayerl, Whitney	Bayne, Jesse	Bayouth, Michael	Bays, Romani
Bazan, Alex	Bazan, Michele	Bazan, Sara	Bazar, Julia	Bazinet, Adam	Bazinet, Jon
Bazn, Linda	Bazzini, Eleanor	Bea, Lorraine	Beach, Elizabeth	Beach, Elva	Beach, John
Beach, Muriel	Beach, P	Beachler, Aleda	Beaird, Heather	Beal, Chris	Beal, Vicky
Beall, Janice	Beall, Nancy	Bealmear, Kayla	Beals, Nancy	Beam, David	Beam, Robert
Beaman, Lisa	Beaman, Nancy	Bean, Eliza	Bean, Elizabeth	Bean, F	Bean, Robin
Bean, Zjannae	Bear, Charlotte	Bear, Steve	Beard, Jan	Beard, Jeff	Beard, Lara
Beard, Teressa	Beard, Valerie	Bearden, Jim	Bearden, Lisa	Beardmore, Carol	Beardshear, Donald
Beardsley, William	Beasley, Michael	Beasley, Rena	Beasley, Todd	Beathard, Erin	Beatini, Tom
Beattie, Warren	Beatty, Gwen	Beatty, Lorne	Beatty, Peter	Beaty, Lee	Beauchamp, Angelene
Beauchamp, Beryl	Beauchamp, Catherine	Beauchamp, Craig	Beauchamp, Kristin	Beauchamp, Susan	Beauchemin, Sharon
Beaudrot, Nancy	Beaudry, Ursula	Beaulier, Ervin	Beaulieu, Richard	Beaumont, Jack	Beaupre, Janet
Beaven, Nancie	Beavers, Claude	Beavers, John A	Beavers, Nancy	Beber, Ethan	Becherer, Ann
Bechtel, Albert	Bechtel, Mark	Bechtel, William	Bechtholt, Susan	Beck Glueckert, Beverly	Beck, Barbara
Beck, Dana	Beck, EA	Beck, Eric	Beck, Holly	Beck, Jeff	Beck, Kristen
Beck, Laurie	Beck, Margaret	Beck, Melissa	Beck, Nanette	Beck, Richard	Beck, Taunja
Beck, Thomas	Beck, William	Becke, George	Beckel, Sharyn	Becker, Andrew	Becker, Anthony
Becker, Beverly	Becker, Christine	Becker, Don	Becker, Donna	Becker, Dr. Lucillle & Robert	Becker, Elaine
Becker, Margot	Becker, Marlys	Becker, Marsha	Becker, Martin	Becker, Ray	Becker, Robert
Becker, Tami	Becker, Tim	Becker-brogle, Kathy	Beckerman, Gary	Beckers, Jeffrey	Beckert, Charlotte
Beckman, Mary	Beckner, Karen	Beckwith, Mark	Bedard, L G	Beddoe, Amy	Beder, Crystal
Bedford, Victoria	Bedingfield, Kay	Bednarcik, Margaret	Bednarz, Colleen	Bedregal, Raul	Beebe, Dana
Beebe, Karolyn	Beebee, Kara	Beechey, Dennis	Beeck, Nicole	Beecken, Tim	Beegle, Margaret
Beeler Ii, James	Beeler, Kimberly	Beeman, Dorothy	Beeman, Joanne	Beene, Dolores	Beer, Alan
Beer, Julie	Beerheide, Erna	Beers, Judith	Beery, Alexis	Beery, Richard	Beeson, Emily
Beeson, Marti	Beetley-hagler, Chris	Begalke, Donald	Begalske, Leigh	Begg, Dakota	Beggs, James
Beggs, Robert	Begley, Matt	Beglin, Pete	Behar, Victoria	Behenna, Juanita	Behn, Ulla
Behre, Bonnie	Behrens, Carla	Behrens, Joanna	Behrstock, Robert	Behson, Rina	Beier, Melody
Beigel, Doug	Beigel, Lynda	Beil, Dr. Charlie	Beilin, Robert	Beilstein, Mike	Bein, Jeanie
Bein, Keith	Beirne, Shana	Beitel, Timothy	Beitlich, Kris	Bejgrowicz, Thomas	Bekas, Sheryl
Bekiarian, Donna	Belandia, Ingrid	Belanger, John	Belanger, Mike	Belasco, Elizabeth	Belau, Peter
Belcastro, Frank	Beletsky, Agnieszka	Belfer, Morgan	Belgiorno, Laura	Bell, Brea	Bell, Christine
Bell, Clark	Bell, Darryl	Bell, David	Bell, Deborah	Bell, Gary	Bell, Linda

Bell, Merriann	Bell, Richard	Bell, Rick	Bell, Roy	Bell, Sharyle	Bell, Teresa
Bell, Tony	Bell, Victoria	Bell, William F.	Bellanca, Michael	Bellano, Jennifer	Bellantoni, Marianna
Bellantoni, Rosemary	Bellavia, Linda	Bellefeuille, Barbee & Ronald	Bellerjeau, William	Bellero, Lisa	Bellerose, Yvette
Belleza, Catherine	Bellinger, Michael	Bell-kaul, Ph.d., Joan	Bellomo, Nicholas	Bellomo, Stephen	Belloso-curiel, Jorge
Bellows, David	Bellucci, Lucille	Bellum, Victoria	Belmir, Dina	Beloin, Sylvain	Belongie, Mignon
Belovitch, Jeanne	Belrose, Bradley	Belsinger, Ashley	Belter, Jerry	Beltram, AL	Beltran, Emelia
Beltran, Monica	Beltrone, Paula	Beltt, Tom	Belyea, Diane	Benac, Heather	Benador, Laetitia
Benardo, Sally	Benavides, Marilyn	Benavidez, Jill	Bence, Gary	Bench, Robert	Bendall, Georganne
Bendana, Phoebe	Bender, Ashley	Bender, Bruce	Bender, Jody	Bender, Karen	Bender, Lauren
Bender, Linda	Bender, Matt	Bender, Sarah	Bendich, David	Bendix, Pamela	Bendler, Simone
Bendush, Cindy	Benedet, Carmen	Benedict, Marc	Benet, Mercedes	Benford, AL	Bengel, Anna
Bengel, James	Benglen, Sonia	Bengston, Lynn	Benincasa, Bianca	Bening, Allison	Ben-jacob, Ali
Benjamin, Alex	Benjamin, Christopher	Benjamin, Dawn	Benjamin, Elaine	Benjamin, Patricia	Benjamin, Rev Audrey And Andrew
Benkman, Craig	Benko, Lindsay	Benneian, Travis	Benner, ED	Bennet Bara, Sue	Bennett, BL
Bennett, Brad	Bennett, Bruce	Bennett, Bryan	Bennett, Carol	Bennett, Charles	Bennett, Chloe
Bennett, Colin	Bennett, Dianna L	Bennett, Jesse	Bennett, Kevin	Bennett, Marsha E	Bennett, Mary Sue
Bennett, Nancy	Bennett, Ravenel	Bennett, Robyn	Bennett, Stephanie	Bennett, Tamera	Bennett, Thomas
Bennett, Tim	Bennett, Walker	Bennett, William	Bennett, William	Benning, Jessica	Bennion, Beth
Benoit, Denise	Benoit, Madalyn	Benschoter, John	Bensetler, Shirley	Ben-shimeon, Robin	Bensinger, Judy
Benson, Bruce	Benson, Cris	Benson, David L.	Benson, Donnie	Benson, Helen	Benson, Howard
Benson, Julie	Benson, Julie	Benson, Karen	Benson, Kim	Benson, Leonard	Benson, Madeline
Benson, Mark	Benson, Roxanne	Benson, Stephanie	Benson, Sydney	Bensusen, K.	Bentley, A
Bentley, Cynthia	Bentley, Kathy	Bentley, Marianne	Bentley, Michelle	Benton, Annette	Benton, Duane
Bentzel, Jennifer	Beran, Doug	Beranek, Robert	Berardi, Larry	Berardino, Diana	Berberi, Julie
Beres, James	Berezansky, Nick	Berg, Brian	Berg, Elaine	Berg, K.	Berg, Laura
Berg, Naomi	Berg, Stephen	Bergan, Marion	Bergdoll, Katharina	Bergen, Jameson	Bergen, Jaye
Bergen, Jeanne	Bergen, Jeffrey	Bergen, Peggy	Berger, Elizabeth	Berger, Elmer	Berger, Gretchen
Berger, Joan	Berger, Josh	Berger, Julia	Berger, Larry	Berger, Linda	Berger, Lisa
Berger, Margaret	Berger, Rachel	Bergeron, B	Bergeron, Jeanene	Bergeron, Sheilagh	Bergey, Nancy
Bergh, Darcy	Berghammer, Annette	Bergholt, Sharyn	Berglund, Spencer	Bergman, Andrei	Bergman, Michael
Bergman, Steve	Bergman, Steven	Bergmann, Eileen	Bergner, Christy	Bergstresser, Sara	Bergstrom, BO
Bergstrom, Brenda	Beringer, Dean	Beringer, Marita	Berk, Ilona	Berkana, Mary	Berkel, Cady
Berkey, James	Berkheimer, James	Berkheimer, Nicole	Berkon, Marilyn	Berkovich, Eugene	Berkson, Margery
Berkvist, Andy	Berl, Diane	Berland, Paul	Berlant, Rebecca	Berlin, Meg	Berlind, Alexey
Berliner, Jill	Berman, Cheryl	Berman, Jean	Berman, Jesse	Berman, Karen	Berman, Leah
Berman, Libby Esther	Berman, Lindsay	Berman, Pat	Berman, Pearl	Berman, Steven	Bermea, Stephanie
Bernabei, Francesca	Bernabei, Kaatje	Bernales, Giuliana	Bernard, Annette	Bernard, Antonia	Bernard, Damian
Bernardi, Charles	Bernardo, Kathleen	Bernas, ED	Berndt, David	Berner, K	Berner, Laura
Bernett, Cynthia	Bernhard, Ginny	Bernhard, Lucienne	Bernhart, Barbara M	Bernheim, Paul	Bernofsky, Shirley
Bernsl, Angela R	Bernstein, Beau	Bernstein, Bonnie	Bernstein, Laura	Bernstein, Maxine	Bernstein, Roslyn
Berriman, Karen	Berry, Bethany	Berry, Elizabeth	Berry, Julie	Berry, Ken	Berry, Patricia
Berry, Richard	Berry, Robert	Berry, Suzanne	Berry, Wanda	Berryman, Jennifer	Berta, Susan
Bertelsen, Judy	Berthold, Christiane	Bertholl, Gerald	Berthoud, Heidi	Bertolino, Ariana	Bertolone, Thomas
Bertram, Harrison P	Bertrams, Elizabeth	Bertrams, Michael	Bertsche, Suzanne	Bertucci, Rosemary	Berzel, Janice
Berzins, Ieva	Besancon, Maureen	Beschler, Ellen	Bescript, Linda	Bess, James	Bess, Karen
Best, Dharma	Best, Nelle	Best, Vicki	Bestick, Maureen	Betancourt, Linda	Betchkal, Steve
Bethel, Elizabeth	Bethke, Linda	Bethune, Ann	Bethune, William	Betkowski, Ruth	Betsill, Eden
Bettencourt, Carol	Bettendorf, Lisa	Betters, Kathleen	Bettge, Joni	Bettinsoli, Alisha	Bettlach, Steve
Betts, Cynthia	Betts, Mary	Betts, Nanette	Betty, Scott	Beutel, Teresa	Bevan, Jae
Beverly, Robert	Bevitz, Harvey	Bevsek, Jean	Bey, Lisa	Beyer, Cindy	Beyer, Dalia
Beyer, Maureen	Beyerle, Brittany	Bez, Delphine	Bhandari, Prem	Bhathal, Rajdeep	Bhattacharji, Lee
Bhence, Blaze	Bhikkhuni-theri, Tathaaloka	Biagioni, Peter	Bialczak, Deanna	Bialeschki, Charles	Bianco, Celeste
Bible, Lee	Bibo, David	Bickel, Betsy	Bickel, Bettina	Bickel, Kenneth	Bickel, Nicole
Bickel, Rebecca	Bickel, Terry	Bickers, Kevin	Bicking, Ann	Bicknell, Frances	Bicoy, Sophia
Biddle, Maxine	Bieber, Stanley	Biederman, Bruce	Biegen, Celeste	Biel, Timothy	Bielaus, Edward

Bielawski, Richard	Bieliunas, Joseph	Bien, Annie	Bieniek, Mike	Bieniek, Sandra	Bierbaum, Rebecca
Bieritz, Dave	Biermaier, Jennifer	Bierman, Ken & Joann	Biernoff, Elisheva	Bigelow, Andrew	Bigelow, Richard
Biggane, Michele	Biggard, Debbie	Biggers, Doug	Biggins, Jane	Biggs, Amy	Biggs, James
Biggs, Susan	Bijkerk, Inie	Biklen, W. Michael	Bikulcs, Lucy	Biler, C	Bilge, Carol
Bilgen, Lisa	Bill, Charlotte	Bill, Eileen	Bill, Marissa	Bill, Robert	Bill, Susan
Billeb, Andrew	Billiard, Cynthia	Billings, Jay	Billington, Danielle	Billmaier, Michelle	Billmeier, Jr., M.d., Gerard
Bills, Barbara	Binder, Caroline	Binder, Gene	Binder, Kenneth	Binder, Paul	Binderim, Gary
Bindseil, Eric	Binette, Janet	Binford, Michelle	Bingham, Charles	Bingham, Shannon	Bingham, Tylynn
Binion, Toni	Binkerd, Victoria	Binkley, Fred	Binkley, Margaret	Binnion, Peggy	Binns, Kari
Binstok, Madison	Bintz, Marilyn	Biondi, Christian	Birch, Rebecca A	Birch, Suzanne	Birchem, Regina
Birch-williams, Penny	Birckhead, Peter	Bird, Jan	Bird, Oscar	Bird, Zoe	Birdsill, Sean
Birdsong, Pat	Birkeland, Celeste	Birkenes, Sondra	Birkett, Courtney	Birnbaum, Beth	Birnbaum, Jacqueline
Biroc, Susan	Bisant, Dan	Bisbee, Pam	Biscardi, Nancy	Bischof, Greg	Bishop, Carol
Bishop, Cheryl	Bishop, Cori	Bishop, Evelyn	Bishop, George	Bishop, Jackie	Bishop, Joel
Bishop, Mark	Bishop, Melissa	Bishop, Norman A.	Bishop, Roberta	Bishop, Scott	Bishop, Tarun
Bishop, William	Bisht, Kalyan	Bisic, Ramiz	Bisker, Edward	Bispham, Kathryn	Bisschop, Peter
Bissell, Mar	Bisset, Sharon	Bissett, Cheryl	Bissonnette, Raymond T.	Bistak, Leo	Bitar, Helen
Bittan, Bradley	Bittenbinder, Barb	Bitter, Merrill	Bittle, Dionna	Bittner, Margaret	Bittorf, Charles
Biv, Mike	Bixby, Ann	Bixenstine, Edwin	Bixler, Alan	Bixler, Julie	Bixter, Pam
Bizup, Karla	Bizup, Nancy	Bjork, Arthur	Bjork, Vince	Bjorkman, Elizabeth	Bjorngaard, Ericka
Blacik, Lawrence	Black, Chanelle	Black, Gillian	Black, Gregory	Black, Jake	Black, Karen
Black, Karina	Black, Lesley	Black, Linda	Black, Marion	Black, Mary Ann	Black, Meaghan
Black, Nancy	Black, Nancy	Black, Paul	Black, Robert	Black, Sandra	Blackburn, Paul
Blackfoot, Joshua	Blackford, Brik	Blacklock, Craig	Blackthorne, Blaine	Blackwell, Bruce	Blackwell, Debbera
Blackwell, Sama	Blackwell, Stacey	Blackwellmarchant, Pat	Blackwood, Bridget	Blade, Morgan	Bladow, Jason
Blaesi, Brent	Blaesingthompson, Shawn	Blagden, Katherine	Blagen, Jessica	Blaha, John	Blain, Susan
Blair, Audrey	Blair, Carrie	Blair, Edward	Blair, Judith	Blair, Richard	Blair, Roger
Blair, William	Blais, Gretchen	Blake, Anna	Blake, Frank	Blake, Janice	Blake, Jocelyn
Blake, Kathy	Blake, Lisa	Blake, Richard	Blake, Susan	Blakely, Val	Blakeney, Arvin
Blaker, Shawna	Blakesley, Robin	Blakey, Dan	Blakey, Sally	Blakley, Margaret	Blakley, Sharon
Blanc, Joseph	Blanchard, Diane	Blanchard, John	Blanchard, Joyce	Blanchard, Maryline	Blanchard, Robert
Blanche, Anne-laure	Blancher, Eddie	Blanchette, Laura	Blanck, Ambre	Blanck, Sirianna	Blanco, Christian
Blandford, Mark	Blandin, Anne	Blane, Deedee	Blanford, Julianne	Blank, Gail	Blank, Kathleen
Blank, Patricia	Blankenship, Bob	Blansett, Rob	Blanton, Cricket	Blanton, Jonathan	Blanton, Robin
Blasco, Natalie	Blaska, Ftlix	Blasko, Dr. Donna	Blaszczak, Lorraine	Blatman, Resa	Blatnik, Linda
Blau, Louis	Blaustein, Jonah	Blaustein, Lewis	Blaylock, Roberta	Blaz, Howard	Blazier, Karin
Bleak, Clara	Bleck, Terri	Blecker, Kenlyn	Bledsoe, Richard	Bleefeld, Dr. Ann	Bleifeld, Neil
Bleijenberg, Davinia	Blenker, Angel	Blessing, Kate	Blevins, Cheryl	Blevins, Katherine	Blevins, Shirley
Blevins, Terri	Bliden, Michael	Blindauer, Gregory	Blinken, David	Blisko, Kary	Bliss, Anushka
Bliss, John	Bliton, Patricia	Blitz, Danny	Blizzard, Misty	Bloch, Michael	Blochowiak, M.d., Patricia
Block, Alison	Block, Gary	Block, Hadia	Block, Liz	Block, Oliver	Bloczynski, Vicki
Blodgett, Jennie	Blodgett, Linda	Blodick, Sheryl	Bloedel, Michael	Bloedow, Maryann	Blomfield, Mark
Blond, Olivia	Bloom, Bonnie	Bloom, Carla	Bloom, Claudia	Bloom, Glen	Bloom, Mike
Bloom, Robert	Bloom, Robert	Bloom, Sara	Bloom, Steve	Bloomenson, Kathy	Bloomer, Gail
Bloomer, Marilyn	Blosser, Frederick	Blount, Delilah	Blount, Susan	Blu, Christa	Blubaugh, Susan
Blue, Carol	Blue, Cindy	Blue, Donna	Blue, L	Bluestone, Susan	Bluhm, Darcy
Bluhm, Kathy	Blum, Gina	Blum, Jeanne	Blum, Karen	Blum, Scott	Blumberg, Laura
Blume, Gerald And Louise	Blumenfeld, Tom	Blumenthal, Harry	Blumert, Joel	Blunt, Christine	Blustein, Md, Ronald S
Bly, David	Blydenburgh, Meghan	Blythe, Frances	Blyznakov, Kosta	Boatwright, Ivan	Bobb, Kathleen
Bobb, Shelley	Bobbitt, Tammy	Bober, Loretta	Bobo, Orion	Bobroff, Alex A.	Bobzien, Gary
Boccalon, Jana	Bocchetto, Louis	Bockelman, Kathy	Bockmann, Nils	Bodemar, Jeri	Boden, Thane
Bodine, Frank	Bodine, Josh	Bodkin, James	Bodnar, Cecilie	Bodner, Eric	Bodner, Robert
Boeckermann, Jesse	Boeckman, Abbey	Boehler, Karen	Boehm, Anita	Boehm, Robert	Boehmer, L

Boelter, Jennifer	Boerema, Roelfien	Boerner, Gary	Boerner, Susan	Boes, Jennifer	Boettcher, Brian
Boeyink, Tracy	Bogaards, Wendy	Bogachus, Lindsey	Bogan, Ann	Bogan, Susan	Bogart, Barbara
Boggs, Chris	Boggs, George	Boggs, Nancy	Bogle, Jon	Boglia, Bob	Bogoff, Stephen
Bogs, Cynthia	Bogue, Renee	Boguske, Matthew	Bohac, Stephen	Bohana, Roxanne	Bohl, Calleen
Bohler, Edson	Bohlman, R. Christopher	Bohmfalk, Robert	Bohne, Kenneth	Bohnen, Julia	Boice, Ruth
Boirionnach, Maeryn	Boise, Gretchen	Boisse, Christine	Boisvert, Larwence	Boixo, Karin	Boizard, Sylvie
Bojarski, Lawrence	Boka, Erika	Bokaie, Michelle	Bokor, Arthur	Boland, Donna	Bolcon, W
Boldin, Anastasia	Boldrini, Byron	Bolduan, Linda	Bolduc, Cheryl	Bolduc, Deirdre	Bolduc, Susan
Bolen, DK	Boletchek, Stephen	Bolgiano, Christel	Bolick, Jerry	Bolinger, Jim	Bolinger, Travis
Boliver, Emily	Bollini, Valerie	Bolman, David	Bolman, Diane	Bolson, Jean	Boltares, Martha
Bolton, Kate	Bolzle, Denise	Bombara, Tom	Bombay, Jennifer	Bonaccorsi, Gabriella	Bonak, Constancia
Bonazzi, Robert	Bond, Carolyn	Bond, Chris	Bond, Elena	Bond, George	Bond, Jada
Bond, Jessika	Bond, Jill	Bond, Lauren	Bondy, Jessica	Bone, Raquel	Bonfield, Barbara
Bonfoey, Kathleen	Bongardt, Chris	Bonger, Kris	Bonhart, Wendelyn	Bonhomme, Sandra	Boniello, Kristen
Bonilla-jones, Carmen Elisa	Bonin, Richard	Bonini, L	Bonk, Denise	Bonk, Margie M.	Bonnen, J
Bonner, Tracey	Bonnet, Debbie	Bonotto, Ann	Bonse, Bonnie	Bonvouloir, Lucille	Bonzosavage, Elizabeth
Boogaard, Susan	Book, Rona	Bookheimer, Donna	Boom, Diana	Boom, Marcy	Boomgaarden, Mary
Boomhower, Deborah	Boone Altshuld, Bonnie	Boone, Bruce	Boone, Jim	Boone, Jim	Boone, Lynn
Boone, Mark	Boone, Merrill	Boone, Sarah	Boortz, Brian	Boot, Patrick	Booth, Carolie
Booth, Cindy	Booth, Diana	Booth, Kristee	Booth, Maggie	Booth, Rebecca	Booth, Richard
Booth, Sandra	Boothby, Mimi	Boothroyd, Angelika	Boraby, Ali	Borame, Joan	Borbo, Gilmer
Borchers, Beth	Borchers, Margie	Borda, Stephani	Bordallo, Bob	Bordedalwadi, Andrea	Bordelon, Tika
Borden, B	Borden, Scott	Bordenave, Michael	Bordin, Claudia	Borello, Mary	Bores, Millie
Bores, Suzanne	Borg, Patricia	Borgardt, Karen	Borgerson, John	Borgono, Deb	Borgquist, Ronald B.
Borin, Victoria	Boris, Donna	Borkowski, Laurie	Borland, Bonnie	Borman, Jeana	Bornstein, Bunny
Borodina, Elena	Boronski, Sylvia	Borri, Patricia	Borske, Cindy	Borth, Paul	Borton, Linda
Borus, Myrna	Bory, Jill	Bosarge, Miklos	Bosch, David	Bosch, Heather	Bosch, Ken
Boscov, Susan	Bose, Joanna	Bosisio, Lucille	Bosley, Jacqueline	Bosman, Fred	Bosnos, Lorna
Bosque, Edgar	Boss, Laura	Bossert, Elizabeth	Bostian, Sandra	Boston, Marsha	Boswell, George
Bosworth, K	Botchuck, Mindy	Botticelli, Carole	Bottom, Julia	Botwinick, Joan	Boubeaux, Taniesha
Bouchard, Conrad	Bouchard, David	Bouchard, Michele	Boucher, Denise	Boucher, Helen	Boucher, Karen
Boucher, Lewis	Boud, Patricia	Boughal, Dawn	Bougher, Thomas	Bouilland, Stacy	Boulan, Cassidy
Boulanger, Catherine	Boulet, Marie	Bouley, Allan	Boumali, Omar	Bound, Aida	Bounds, Andrea
Bourassa, Veronica	Bourbina Jr, Michael Anthony	Bourdet, Susan	Bourdette, Christine	Bourdow, Carolyn	Bourg, Karen
Bourgeacq, Jacques	Bourgeois, Paula	Bourget, Jeremy	Bourgholtzer, Joey	Bourgoyne, Michelle	Bourgue, Virginie
Bourguignon, Cheryl	Bourke, Jessie	Bourks, Claudia	Bourland, Maiya	Bourlotos, George	Bournellis, Cynthia
Bourque, James	Bourquin, Doug W.	Bouse, Ari	Bouteille, Cyril	Bouton, Kathy	Boutz, Becky
Bouvier, Kathy	Bouyea, Lauren	Bova, John	Bovaird, Layken	Bove, Clifford And Pearl	Bovee, Emily
Boveemckelvey, Therese	Bovenkamp, Glen	Bovenkerk, Janet	Bow, Leslie	Bowani, Christine	Bowden, Joan
Bowdoin, Bernice	Bowdy, Mark	Bowen, Nigel	Bowen, Patricia	Bowen, Rick	Bowen, Robert
Bower, Christine	Bower, Jan	Bower, Jerry	Bower, Stephen	Bowers, Bettina	Bowers, David
Bowers, Debra	Bowers, Martha	Bowers, Seneca	Bowie, Patricia	Bowler, M. Joseph	Bowles, Sherry
Bowley, Kathleen	Bowling, Annie	Bowling, Beth	Bowling, Jerry	Bowling, John	Bowman, Bobbi
Bowman, Bristol	Bowman, C.A.	Bowman, Candy	Bowman, Charles	Bowman, Jennifer	Bowman, Leah
Bowman, Lee	Bowman, Margaret	Bowman, Nancy	Bowman, Sylvia	Bowman, Sylvia	Bowman, Toni
Bowne, Grace	Bowser, Denise	Bowser, Lynn	Bowser, Zach	Boyarsky, Steven	Boyce, Arline
Boyce, Janice	Boyce, Mary	Boyce, Matt	Boyce, Nancy	Boyce, Richard	Boyce, Shirley
Boyce, Steve	Boyd, Candace	Boyd, Carolyn	Boyd, Eric	Boyd, Esther	Boyd, Glynis
Boyd, John	Boyd, Judith	Boyd, Kingsley	Boyd, Lewis	Boyd, Nancy	Boyd, Patrice
Boyd, Roberta	Boyd, Stacey	Boyd, Tobias	Boyd, Vicy	Boyer, David	Boyer, Jessica
Boyer, Paula	Boyer, Paulette	Boyers, Gary	Boyett, Marta	Boykin, Linda	Boylan, Michelle
Boyle, Kenneth	Boyle, Lucia	Boyle, Marjorie	Boyle, Patricia	Boyle, Roxanne	Boyles, Kristen

Boyles, Steven	Boylston, Sandra	Boyne, Jonathan	Boynton, Joanne	Bozovich, Rhonda	Braaten, Judie
Braaten-lee, Arland	Braband Venayagamoorthy, Gabriele	Brabec, Karen	Brace, Nicholas	Brachel, Tiana	Brachhold, Andy
Brachman, Phyllis	Bracke, Gregg	Bracken, Fay	Brackney, Michael	Bradburn, Mindy	Bradbury, Alan
Bradbury, David	Braden, Amanda	Braden, Clara	Bradford, Andrew	Bradford, Barbara	Bradford, Mishelle
Bradford, Teresa	Bradley, Bill	Bradley, Breanna	Bradley, Carol	Bradley, Cindy	Bradley, Cy Nthia
Bradley, Elizabeth	Bradley, James & Alice	Bradley, Jason	Bradley, Joshua	Bradley, Kenn	Bradley, Linda
Bradley, Mark	Bradley, Mark	Bradley, Paula	Bradley, Peggy	Bradley, Rhonda	Bradley, Ryan
Bradley, Sharon	Bradley, Susan	Bradshaw, John	Bradshaw, Larry	Bradshaw, Richard	Bradshaw, Seren
Bradshaw, Susan	Bradsher, Whitney-bear	Bradstreet, Stuart	Bradt, Barbara	Brady, Ann K	Brady, Bill
Brady, Carol	Brady, Clare	Brady, Corinne	Brady, Daren	Brady, Katie	Brady, Lizabeth
Brady, Suzy	Bragg, Dawn	Bragg, Dianne	Bragg, Laurie	Bragg, Terry	Brainard, Jonathan
Brainerd, Kay	Brainin, Sylvia	Braithwaite, Georgia	Braithwaite, Kimyn	Braithwaite, Ruth	Brambilla, Madeline
Brame, David	Bramlage, Laurie	Bramlet, John	Bramlett, Larry	Bramlette, Jenny	Bramwell, William
Branca, C	Branca, Louanna	Brancaforte, Stephanie	Branch, Judith	Brand, Dennis	Brandariz, Anita
Brandenburg, Glen	Brandenburg, Heather	Brandes, Michael	Brandes, Robert	Brandimarte, Kimberly	Brando, Marge
Brandon, Jennifer	Brandon, Melody	Brandriet, Leonard	Brandt, Jenavie	Brandt, Kyle	Brandt, Lyle
Brandt, Patti	Braney, Mary Louise	Brannigan, Kelly	Branning, Richard	Brano, Bob	Bransen, Jacquelyn
Branson, B. Ame	Branstetter, Kevin	Brantley, Marie	Brantley, Tara	Braoudakis, Spyros	Brashear, Logan
Brasher, Mark	Brassard, Sandy	Braswell, Arlene	Bratberg, Rania	Bratcher, Suzanne	Bratt, Michael
Brattland, Janel	Bratvold, Gretchen	Brauer, Joel	Brault, Lawrence	Brault, Phyllis	Braun, Beth
Braun, Clait	Braun, Conchita	Braun, Danielle	Braun, Lisa	Braund, John	Braunsberger, Karin
Braunwart, Tod	Braunwarth, Robert	Brauss, Laurie	Braut, Heather	Brave Bird, William	Braverman, Sidney
Bravo, Angelina	Bravo, Karen	Brawner, Debbie	Braxton, Angelika	Bray, Brent	Bray, Evelyn
Bray, Linda	Bray, Megan	Bray, Robert	Bray, Suzannah	Brayer, Terry	Brayfield, David
Brazeau, Elizabeth	Brazeau, Theodore	Brazill, Kim	Brazitis, Peter	Breakey, Gail	Breakfield, Sandra
Breakwell, Amy	Brebner, Linda	Breckenridge, Bonnie	Breckenridge, Mary	Breckinridge, Lynn	Breda, BO
Bredow, Cindy	Breed, David	Breeden, Phyllis	Breeding, Becky	Breeding, Charles	Breen, C
Breen, Carol	Breen, Catherine	Breese, Marlee	Brehm, Anita	Brehm, Honora	Breiding, Joan
Breiner, Michael	Breitenstein, Todd	Breitling, Katie	Breitman, Randy	Breland, Jabe	Brellow, Tim
Bremmer, Faith	Bremmer, Suzanne	Bremner, Ayden	Bremner, Bryan	Bremner, Deborah	Bremner, Derek
Bremner, Steve	Brendalen, Einar	Brennan, Cathy	Brennan, Charles	Brennan, Dan	Brennan, Denise
Brennan, Jamie Lee	Brennan, John	Brennan, Martha	Brennan, Patricia	Brennan, Rachel	Brennan, Susan
Brenneman, Don And Marilyn	Brenner, Carol	Brenner, Jared	Brenner, Natasha	Brenner, Thomas	Brennerh, Henry
Brenner-ward, Isis	Brennock, Ash	Brensinger, Elizabeth	Brentlinger, Kathleen	Breny, Karen	Brenza, Tina
Breon, Beau	Brescia, Lynn	Bresciani, Julie	Breslin, Mike	Breslin, Susan	Bresnahan, Rose
Bresnan, Linda	Bressie, Jeannine	Bressler, Robin	Bresson, Sheri	Breton, Denise	Brett, Lola
Brewer, Amanda	Brewer, Anna	Brewer, Christopher	Brewer, John	Brewer, Laurel	Brewer, Stanley
Brewster, Michael	Brey, Nick	Breyfogle, Peter	Breza, Virginia	Brezina, C.	Brezinski, Rachel
Bricic, Jasmina	Brick, Karen	Brickell, Valerie	Bricken, Leigh	Bridge, Aaron	Bridge, Teri
Bridgeland, Rhea	Bridgeman, David	Bridgeman, Kimberly	Bridges, Caroline	Bridges, Gary	Bridges, Linda
Bridwell, Jack	Bridy, Joseph	Brien, Ashley	Brien, Ray	Brien, Vivian	Brierty, Linda
Brigandi, Joseph	Briggs, James	Briggs, Kathleen	Briggs, Keri	Briggs, Malcolm	Briggs, Robert
Briggs, Terry	Brigham, Barbara	Brigham, Sara	Bright, Faye	Bright, Fionna	Bright, Jeffrey
Bright, Lori	Brigner, Liberty	Briix, Rob	Brilhart Ibanez, Beverly	Brimer, Richard	Brimm, Martha
Brincka, Frank A.	Bringleson, Sharon	Brink, Eric	Brink, Jaye	Brink, Justin	Brink, Tom
Brinker, Erica	Brinker, Karl	Brinker, Mary Jo	Brinkerhoff, Irene	Brinkerhoff, Muiz	Brinkhaus, Andrew
Brinkley, Randi	Brinkley, Ursula	Brinkman, Kathi	Brinkman, Lisabette	Briones, Patricia	Brisebois, Lisette
Briskin, Jordan	Brissenden, Helena	Brisson, Daniel	Brisson, Elaine	Brisson, Emil	Bristol, Roberta
Bristow, Mary	Briswalter, Janet	Britt, Elizabeth	Brittle, Stephen	Britton, Bill	Britton, Jim
Britton, Lauren	Britton, Lindsay	Britton, Marilyn	Britzman, Bonnie	Brix, Werner	Bro, John
Broad, Julia	Broadhead, Elaine	Broadus, Steven	Broadway, Mary	Broadwell, Nikki	Brobst, Robert
Broches, Alexandra	Brock, Coleen	Brocke, Jeff	Brockell, Barbara	Brockman, Sarah	Brockmiller, Margaret

Brockway, Barbara	Brockway, Mary	Brod, Martin	Brod, Natalie	Brodbeck, Thomas	Broder, Ronald
Broderick, Deborah	Broderick, William	Broderson, Peter	Brodeur, Janet	Brodie, Ruth	Brodley, Flo
Brodsky, Stanley	Brody, Debbi	Broeder, Robert	Broege, Hank	Broer-leroux, David	Brombach, Elizabeth
Bromer, John	Brommel, Alan	Bronner, Hope	Bronsdon, Katherine	Bronson, Carl	Bronson, Sue
Brooke, Michael	Brooker, Gary	Brookinss, Lura	Brookover, Jeff	Brooks Appelbaum, Anita	Brooks, Alvin
Brooks, Barbara	Brooks, Beverley	Brooks, Catherine	Brooks, Daniel	Brooks, Darlene	Brooks, Dianne
Brooks, Frank	Brooks, Jenny	Brooks, Karl	Brooks, Ken	Brooks, Kendra	Brooks, Lynn
Brooks, Mary	Brooks, Patricia	Brooks, Paul	Brooks, Rhoda	Brooks, Rick	Brooks, TJ
Brooksfetty, Cynthia	Broome, Peter	Brophy, Michele	Brophy, Tim	Brophy, Tracy	Bross, Bill
Brostic, Rose	Broten, Karen	Brothers, Jill	Brothers, Nancy	Brotman, Charles	Brough, Karishma
Broughton, Beaty	Broughton, Michael	Brouillet, Ellen	Broussard, Julie	Brower, Patricia	Brown, Alan
Brown, Alex	Brown, Allen	Brown, Andrew	Brown, Anna Marie	Brown, Anne	Brown, April
Brown, Arpita	Brown, Babette	Brown, Barbara	Brown, Brian	Brown, Camille	Brown, Carole
Brown, Carolyn	Brown, Charlie	Brown, Christopher	Brown, Claire	Brown, Clarissa	Brown, Craig
Brown, Cynthia	Brown, Dannis	Brown, Deja	Brown, Denise	Brown, Denise	Brown, Diane
Brown, Dianna	Brown, Dick	Brown, Donna	Brown, Dorry	Brown, Duncan	Brown, Dvm, Mary
Brown, Emily	Brown, Erica	Brown, Gayle	Brown, Gerald	Brown, Glenda	Brown, Greg
Brown, Heike	Brown, Ingrid	Brown, James	Brown, Jeannine	Brown, Jeff	Brown, Jeffrey
Brown, Jerry	Brown, Jessi	Brown, Joseph	Brown, Joyce	Brown, Julia	Brown, Julia
Brown, Julie	Brown, Julie	Brown, Kaleta	Brown, Katherine	Brown, Kathleen	Brown, Kathleen
Brown, Kathryn	Brown, Kay	Brown, Kelly	Brown, Kevin P.	Brown, Kiley	Brown, Laura
Brown, Lauren	Brown, Lawrence	Brown, Lenora	Brown, Leo	Brown, Leslie Danielle	Brown, Linda
Brown, Lizi	Brown, Margaret	Brown, Margaret	Brown, Marguerite	Brown, Marilyn	Brown, Maryann
Brown, Maryetta	Brown, Marygrace	Brown, Maureen	Brown, Michael	Brown, Morgan	Brown, Nan
Brown, Nancy	Brown, Nancy	Brown, Olivia	Brown, Patricia	Brown, Paul	Brown, Paul
Brown, Randi	Brown, Renate	Brown, Rik	Brown, Robert	Brown, Robert	Brown, Robin
Brown, Roderick	Brown, Ronald	Brown, Ronald	Brown, Ronald	Brown, Russell	Brown, Seth
Brown, Stephanie	Brown, Steven	Brown, Susan	Brown, SY	Brown, Tina	Brown, Tracy
Brown, Tyrone	Brown, Vera	Brown, Vickie	Brown, William	Browne, Charletta	Browne, Geoffrey
Browne, Mary	Browne, Patrick	Browning, Charles	Browning, Crystal	Browning, M.	Brown-klahn, Olevia
Brownlee, Cathy	Brownton, Glenn	Brozovich, Lil	Brozovich, Lynn	Brubaker, Betsy	Brubaker, Bryan
Brubaker, Mellissa	Brubaker, Sandra	Bruce, Barbara	Bruce, Felicia	Bruce, Frank	Bruce, Heather
Bruce, Kandy	Bruce, Kevin	Bruce, Leslie	Bruce, Linda	Brucker, Bob	Bruckner, Steven
Bruder, Cheryl	Bruder, Karen	Brueckner, Steph	Bruhn, Johann	Brultz, David	Brumleve, Charles
Bruncati, Michael	Brundage, Janet	Brundage, Nadine	Brune, Kevin	Brune, Stuart	Bruneau, Roger
Brunell, Barbara	Brunelle, Roberta	Bruner, Linda	Bruni, Curzio	Brunn, Linda	Brunner, Sharon
Bruno, Emma	Bruno, Joanne	Bruno, Lorraine	Bruno-small, Janet	Brunson, Frances	Brunson, Jane And John
Brunson, Pat	Brunton, James	Brunton, Johnny	Brush, Dana	Brush, Johnnie	Brush, Tom
Brushaber, Marcie	Brusin, Eugene	Brusius, Dani	Brust, Doris	Bruun, Shari	Bruyere, Pascal
Bruzik, S	Bryan, Adriana	Bryan, Christine	Bryan, Corey	Bryan, Judy	Bryan, Katherine
Bryan, M K	Bryan, Steve	Bryan, Teresa	Bryant, Dianne	Bryant, Emily	Bryant, Hank
Bryant, Harvey	Bryant, Janice	Bryant, Joene	Bryant, Judith	Bryant, Pamela	Bryant, Ron And Nancy
Bryant, Sandra	Brydon, James	Bryson, Tom	Bubb, Ken And Donna	Bucalos, Holly	Buccola, Heather
Buch, Charles	Buchanan, Anne	Buchanan, Betty	Buchanan, Heather	Buchanan, Helen	Buchanan, Susan
Bucher, Anne Marie	Buchman, Linda	Buchsbaum, Judy	Buck, Barbara	Buck, Julie	Buck, Stockton
Buck, Travis	Buckbee, Donna	Buckhoutwhite, Michael	Buckland, Vinessa	Buckler, Dan	Buckles, Barbi
Buckley Iii, Daniel J.	Buckley, Barbara	Buckley, Christine	Buckley, Juliana	Buckley, Kathy	Buckley, Kimberley
Buckley, Maureen	Buckley, Phyllis	Buckwalter, Mary	Buda, Anthony	Buddenbaum, Windy	Budge, Judy
Budgis, Susan	Budic, Darrell	Budington, Joie	Budka, Peter	Budlong, Jeanne	Budnick, Michael
Budnik, Bradley	Budrunas, Mary	Budry, Robin	Budzinski, Stephen	Buechlein, Debbie	Buehl, Barbara
Buehler, Lisa	Buehner, Norene	Buelow, Chris	Buelow, Ellen	Buenaventure, Eddie	Bueno, Christina
Buensuceso, Antonio	Buer, Jeane	Buetens, A	Buethe, Brad	Buff, Mph, Evelyn	Buffaloe, Mary
Bugbee, Michael	Bugge, Carole	Bugliarelli, Diane	Buglione, Joseph	Buhler, Melissa	Buhowsky, Joseph
Buhrandt, Michelle	Buikema, Ellen	Buil, Beyssa	Buist, Beth Ann	Buist, Nathan	Buistietskiy, Harriey

Bukovitz, Andrew	Bukowski, Nancy	Bulger, Hayley	Bulington, Shannon	Bull, Luci	Bullington, Marion
Bullittjonas, Margaret	Bullock, Donna	Bullock, Rev.jim	Bumble, Reba	Bumgarner, James	Bumiller, Patricia
Bunag, Anna	Bunch, Eugene	Buness, Cynthia	Bungarz, Kathleen	Bunge, Delores	Bunis, Martin
Bunn, Maude	Bunner, Chris	Bunney, Marcia	Bunyard, Trish	Buol, Lauren	Buonaiuto, Janet
Buoncora, Yvonne	Bupp, Sherry	Burch, Maryann	Burch, Piper	Burch, Vinson	Burchard, Patricia
Burchard, Peter	Burchsted, Albert	Burcl, Thatyana	Burcroff, Mary	Burd, Meo	Burdash, Ashley
Burden, Veronica	Burdett, Arthur	Burdick, Amanda	Burdick, Carol	Burdick, Dee	Burdick, Jaron
Burek-faber, Mary	Burens, Roger	Buresh, Margaret	Burg, Max	Burgan, Renee	Burgard, Don
Burgdorf, Jeri	Burge, James	Burge, James	Burge, Julie	Burge, Ken	Burgen, Julia
Burger, Ann Catherine	Burger, Frank	Burger, Nancy	Burger, Theodore	Burgeson, Gail	Burgess, Amy
Burgess, Charlie	Burgess, Christie	Burgess, Kathryn	Burgess, Renee	Burgess, Steven	Burgess, Wendy
Burgevinjohnson, Judith	Burgoon, Larry	Burgos, Judith	Burgos, Pablo	Burianek, Linda	Burkart, Marie
Burke, Arvel	Burke, Beth	Burke, Carla	Burke, Edward	Burke, Joseph	Burke, Kathy
Burke, Lawrence	Burke, Mandy	Burke, Maureen	Burke, Russell	Burke, Theresa	Burkes, Yael
Burkett, Paule	Burkhalter, Sheldon	Burkhardt, Kerry	Burkhart, Don	Burkhart, Elizabeth G.	Burkhart, Geoffrey
Burkhart, Jens	Burkholder, Megan	Burks Forbes, Jane	Burks, James O. Jr.	Burks, Jess	Burks, Laura
Burleigh, Bruce D	Burleson, Shanna	Burman, Lena	Burman, Ruth	Burmester, Michael	Burnap, Arthur
Burnash, George	Burnell, Nathan	Burnet, Greg	Burnett, Billy	Burnett, David	Burnett, Gerald
Burnett, Judy	Burnett, Philip	Burnett, Robert	Burnett, Susan	Burnham, Brett	Burnham, Michael
Burnham, Rachel	Burns, Amanda	Burns, Arlene	Burns, Aspyn	Burns, Bruce	Burns, Cecilia
Burns, Chris	Burns, David	Burns, Dennis	Burns, Gail	Burns, Heather	Burns, Ian
Burns, John	Burns, Juliana	Burns, Kathryn	Burns, Kathryn	Burns, Kerria	Burns, Laurel
Burns, Mary	Burns, Nina	Burns, Robert	Burns, Tim	Burnside, Elinor	Burnup, Debbie
Burpo, Leslie	Burr, Deborah	Burr, Elizabeth	Burridge, Barbara	Burridge, John	Burrill, Richard
Burris, Tina	Burroughs, Deborah	Burroughs, Kate	Burrows, Richard	Burrows, Robert	Bursell, Zachary
Bursey, Aaron	Burson, Chris	Burson, Grace	Burstein, Mimi	Burt, Jerry	Burt, Susan
Burtner, Duane	Burton, Cathy	Burton, David	Burton, Donna	Burton, Dr. Jenn	Burton, G
Burton, Jan Ellen	Burton, Jane	Burton, Janice	Burton, Jonathan	Burton, Kristine	Burton, Matthew
Burton, Robert	Burton, Sandra	Burton-boehr, Emily	Burwasser, David	Burwell, Donald	Burzykowski, Arthur
Busacco, Jeanne	Busani, Elena	Busani, Elena	Busby, Katherine	Busch, Doug	Busch, Grace
Buschena, Cindy	Buschman, Sofie	Busenitz, John	Bush, Claire	Bush, Elizabeth	Bush, Julie
Bush, Lorena	Bush, Patricia	Bush, Steve	Bush, Veronica	Bushart, Cheryl	Bushey, Jon
Bushkoff, Paula	Bushman, Roberta	Bushman-copp, Lily	Bushnell, Marcia	Bushur, Mary	Bushway, Cindy
Buskin, Melodye	Busking, Sandra	Busler, Niles & Michele	Buss, William	Buss, William	Bustamante, Barbara
Bustamante, Maria	Buster, Kathryn	Busterna, Rosemary	Busto, Dennis	Busvek, Janet	Butche, Julie
Butche, Mike	Butcher, Suzanne And Larry	Butera, Robert	Buthe, Rita	Butka, Rosemary	Butkiewicz, Mike
Butkovich, Keith	Butler, Amber	Butler, Barbara	Butler, Daniel	Butler, David And Carol	Butler, Don
Butler, Donna	Butler, Eliza	Butler, Elizabeth	Butler, Garrett	Butler, Hillary	Butler, Jane
Butler, Janice	Butler, Karen	Butler, Kevin	Butler, Linda	Butler, Mark	Butler, Mark
Butler, William	Butterfield, Kyle	Butterworth, Leslie	Buttles, Kathryn	Buttliere, Patty	Button, Mary
Butts, Judith	Butz, A	Butz, Ken	Buxton, Raquel	Buyarski, Doris	Buzaglo, Buzz
Buzzard, Robert L.	Byam, Karl J.	Byars, Brian	Byerley, Jay	Byknish, Chris	Byland, John
Byler, Sue	Byndas, Phyllis	Bynum, Vicki	Byra, Judith	Byrd, Darlene	Byrd, Herman
Byrd, Kavita	Byrne, Anthony	Byrne, Barbara	Byrne, Charles	Byrne, Cynthia	Byrne, Elaine
Byrne, Gretchen	Byrne, John	Byrne, Kim	Byrne, Nick	Byrne, Teresa	Byrnes, Coleman
Byron, Colleen	Bywaters, Lynn	C, A	C, Alyssa	C, Amanda	C, Ben
C, C	C, Cheryl	C, Joe	C, John	C, Kim	C, Maggie
C, Michael	C, Rich	C, Shruti	C, Susan	C., Gabriel	C., Jose
C., Leia	Cabaccang, Malia	Caballero Muhlbach, Nicolas	Caban, Janice	Cabe, John	Cabiati, Paul
Cablay, Kathryn	Cabot, Crystal	Cabot, Jackson	Cabrera, Rita	Caccia, David	Cacciaguida, Matt
Cacho, Omar	Cachola, Ben	Cachopo, Patricia	Cade, Tina	Cadle, Ann	Cadorin, James
Cadosi Wilson, Annette	Cadzow, Daniel	Caesar, Wendy	Caesara, Lynda	Caetano, Mike	Cafarelli, Marjorie

Caffeeshadwick, Angela	Caffejian, Randy	Caffrey, Kelly	Cagianello, Nicholas	Cagle, Michelle	Cagle, William
Cagnetta, Michele	Cahn, Lynda	Cahoon, Debbie	Caiazzo, Joan	Cain, Barbara	Cain, Casey
Cain, Charlene	Cain, Martha	Caine, Deidra	Caine, Todd And Karin	Cairns, Rachel	Calabaza, Matthew
Calabi, Dennis	Calabrese, Angela	Calabrese, Greta	Calabrese, John	Calabria, Valeria	Calambro, AL
Calambro, Leslie	Calcagnino, Gail	Caldera, Michele	Calderon, Edye	Calderon, Ernesto	Calderon, Fernanda
Calderon, Linda	Calderon, Socrates	Calderone, Rn, Dr Annette	Caldwell Chandler, Megan	Caldwell, David	Caldwell, Dotty
Caldwell, Ellen	Caldwell, Kaci	Caldwell, Mary	Caldwell, Norman	Caldwell, Robert	Caldwell, Sophie
Caldwell, Stephen	Caldwell, Tiffany	Cale, Thomas	Calender, Steven	Calestro, Peggy	Calhoun, Jerry
Calhoun, Robin	Calhoun, Susan	Calister-kuhi, Kiirstin	Call, Cynthia	Call, Melissa	Call, Vicki
Callaci, Gloria	Callaghan, Monica	Callahan, Amalie	Callahan, Anne	Callahan, Gloria	Callahan, John
Callahan, Julie	Callahan, Loretta	Callahan, Sharon	Callan, Deirdre	Callaway, Cathy	Callender, Neil
Callesen, Danielle	Callison, Ron	Callon, Ted	Callow, Wayne	Calloway, Alice	Callum, Janet
Calouro, Margaret	Caltabiano, Lucia	Calton, Kara	Calvert, Bruce	Calvert, Chris	Calvert, Mary Ann
Calvert, Rick	Calvin, Daphne	Camacho Humphrey, Adolfo	Camacho, Rosa	Cambo, Alber	Cameron, Cami
Cameron, Greg	Cameron, Jean	Cameron, Jean	Camhi, Sharon	Cammarano, Carrie	Camp, Michael
Camp, Nicole	Camp, Robert	Campanile, Alexis	Campbell, Allan	Campbell, Amy	Campbell, Anne
Campbell, Barbara	Campbell, Bonnie	Campbell, Christina	Campbell, Colleen	Campbell, David	Campbell, F Debbie
Campbell, Frances	Campbell, Ian	Campbell, Jacqueline	Campbell, Jane A.	Campbell, Jesse	Campbell, John
Campbell, Karolyn	Campbell, Laura	Campbell, Lewis	Campbell, Linda	Campbell, Liz	Campbell, Margaret
Campbell, Marie	Campbell, Marilyn	Campbell, Matthew	Campbell, Mike	Campbell, Paul	Campbell, Richard
Campbell, Roberta	Campbell, Shannon	Campbell, Susan	Campbell, Theresa M.	Campbell, Thomas	Campbell, Zeph
Campion, Sharon	Campos, Guillermo	Camus, Nathalie	Canaan Rafhael, Hidalgo	Canada Ii, Riley	Canada, AM
Canady, Ginny	Canarsky, Maurine	Canas, Laura	Canavan, John	Canby, Pat	Cancel, Diana
Cancilla, Debra	Candau, Rosalie	Candela, Belinda	Candela, Joseph	Candela, Kevin	Candelaria, Gene
Candio, Ruth	Candlin, Celia	Canela, Abigail	Caner, Annabel	Canli, Yunus	Cannatanowell, Anita
Canning, Lisa	Canning, Rick	Canning, Robert	Canning, Steve	Cannon, Chris	Cannon, Elizabeth
Cannon, Frank	Cannon, Jean	Cannon, Jewell	Cannon, Maria	Canny, Brian	Cano, Bobby
Cano, Elizabeth	Cantales, Victoria	Cantales, Victoria	Canter, James	Canter, M.	Cantori, Juha
Cantrell, Carol	Cantrell, Justine	Cantrell, Victoria	Cantrell, William	Cantu, Eva	Cantu, Roel
Cantwell, Pat	Canty, Jim	Cap, Jennifer	Capan, Patrice	Cape, Lawrence	Capecci, Sandra
Capezzuto, Raymond	Capilla, Megan Kristine	Caplan Kuhn, Linda	Capone, Shantell	Caponi, Nancy	Capotorto, Jeanette
Cappa, Karen	Capperis, Paulette	Capps, Joshua	Capps, Sally	Cappuccio, Sharon	Capra, Michele
Capshaw, Anita	Capstick, Hilary	Capulong, Meghan	Caputo, Jan	Caputo, Julie	Caputo, Sandra
Car, DE	Caras, Dimitra	Carawan, Heather	Carbary, Lawrence	Carbia, Vanessa	Carbine, Beth
Carbine, Sharon	Carbo, Dana	Carbone, Serena	Card, Carol	Card, Charles	Card, Geraldine
Card, Junko	Card, Kevin	Cardea, Shanna	Cardell, Steve	Cardella, Richard	Cardella, Sylvia
Carder, KJ	Carder, Suzanne	Cardiff, Jeanine	Cardillo, Robert	Cardone, Bethany	Cardoso, Patricia
Cardoso, Tania	Cardullo, J	Care, Debra	Carella, Philip	Caretti, Matthew	Carey, Amanda
Carey, Ann	Carey, Brandi	Carey, Cecilia	Carey, Elizabeth	Carey, Jeffrey	Carey, Kevin
Carey, Madalynn	Carey, Nancy	Carey, Susan	Careykearney, David	Carfagno, Mary	Cargulia, Guy
Carini, Marie Frances	Carivan, Elizabeth	Carl, Jeannie	Carl, Juanita	Carl, Renee	Carleo, Elena
Carley, Alysia	Carley, Louise	Carley, William	Carlile, Michael	Carlini, John	Carlino, Joanne
Carlisle, Julie	Carlisle, Pat	Carlo, Terry	Carlsgaard, Marlene	Carlson, Alex	Carlson, Ann
Carlson, Carol	Carlson, Christine	Carlson, Corey	Carlson, Dorothy	Carlson, Elan	Carlson, Gwen
Carlson, Joan	Carlson, Joel	Carlson, John	Carlson, Kathleen	Carlson, Melissa	Carlson, Nathan
Carlson, Pat	Carlson, Rita	Carlson, Rn	Carlson, Sandra	Carlson, Terry	Carlson, Tessa
Carlson, Trudy	Carlson, Vanessa	Carlson, W H	Carlson-leavitt, Joyce	Carlsson, Sharre	Carlton, Patricia
Carmack, Lindsey	Carman, Heather	Carman, Iris	Carmean, Roxann	Carmichael, John	Carmichael, Victor
Carmody, Phil	Carmona, Federico	Carmonamancilla, Laura	Carneal, Pat	Carnegie, Deborah	Carnell, George
Carnes, Betty	Carnevale, Robert	Carnevale, Vicky	Carney, Cheryl	Carney, Diane	Carney, Janis
Carney, Joseph	Carney, Michael	Carney, Shannon	Carney, Wendy	Carneyfeldman, Catherine	Carns, James
Carol, Barton	Carolan, Daniel	Caron, Anjanette	Caron, Charles	Caron, Margaret	Carosella, Christy

Carothers, Ruthanne	Carpaneto, Danny	Carpenter, Amy	Carpenter, Anpeo	Carpenter, Belinda	Carpenter, Dale
Carpenter, Eileen	Carpenter, Garrett	Carpenter, James	Carpenter, Joancarole	Carpenter, Kathryn	Carpenter, Kurt
Carpenter, Matthew	Carpenter, Michael	Carpenter, Patricia	Carpenter, Robert	Carpenter, Robert	Carpenter, Sue
Carper, Robert	Carpio, Virginia	Carpita, Dan	Carr, Beth	Carr, Caryl	Carr, D
Carr, Deloris	Carr, Gaile	Carr, Hope	Carr, Kathleen	Carr, Kathy	Carr, M.d., Donna
Carr, Michelle	Carr, Roger	Carr, Sandra	Carragher, Daniel	Carraher, Patrick	Carrara, Wayne
Carreau, Marcelle	Carrell, Ellen	Carrell, James	Carreno, Tammy	Carrer, Laurent	Carrera, Joe
Carrico, Nathan	Carrier, Cornelia	Carrier, Paula	Carrier, Samantha	Carrigan, Katherine	Carrillo, Chuy
Carrillo, Mcarmen	Carrillo, Paloma	Carringer, Nancy	Carrington, Gilda	Carrington, Martha	Carroll, Amy
Carroll, Bruce	Carroll, David	Carroll, Deborah	Carroll, Diana	Carroll, Dianne	Carroll, Elisabeth
Carroll, Laura	Carroll, Margaret	Carroll, Marianne	Carroll, Marlene	Carroll, Nathan	Carroll, Sara
Carroll, Shira	Carroll, Sue	Carroux, Charles	Carruthers, Charles	Carruthers, DJ	Carsia, Diane
Carson, Cecelia	Carson, Judith	Carson, Karen	Carson, Linda	Carson, Rani	Carson, Winfield
Carsten, Jim	Carstensen, Teresa	Carswell, Brandon	Carta, Diane	Carter, Alan	Carter, Annetta
Carter, Bill	Carter, Colby	Carter, D	Carter, Gary	Carter, Jacqueline	Carter, Jermaine
Carter, Karen	Carter, Marcia	Carter, Natalie A.	Carter, Paul	Carter, Pauline	Carter, Rhonda
Carter, Ronald	Carter, Susan	Carter, Tripp	Carter, Tyra	Cartier, Linda	Cartwright, Charlsey
Cartwright, Jennifer	Cartwright, Laura	Caruso, Rose	Caruso, Thomas	Carvel, Richard	Carvish, Jeffrey
Carvouniaris, Debbie	Carzello, Elizabeth	Casaday, Garth	Casale, Judith	Casalina, Anita	Casalino, Dylan
Casazza, Gene	Cascia, Cathleen	Cascio, Lynn	Case, John	Casebolt, Nicole	Casella, Jane
Casello, Jay	Casey, Chris	Casey, Eric	Casey, Joyce	Casey, Mary M.	Casey, Michael
Cash, Cathy	Cash, Jeanett	Cash, Joseph	Cash, Karen	Cash, Mary	Cashmore, Susie
Casiello, Kathy	Casini, Riccardo	Casker, David	Caskey, MI	Caso, Mark	Casper, Brett
Casper, John C	Cass, Mike	Cassanova-wells, Laura	Cassar, Kristine	Cassebaum, Anne	Cassel, Debra
Cassel, Marsha	Cassens, Susan	Cassidy, Killian	Cassidy, Mary Ann	Cassidy, Robert	Cassidy, T
Cassiero, Debra	Cassinelli, Peter	Castagna, Maria-elena	Castagna, Robert	Castagnaro, Luisa	Castagnola, Karen
Castaneda, Olga	Castanedamendez, Kicab	Castano, Maria D.	Casteel, Elaine	Casteel, Jessie	Castellano, Elena
Castellanos, Andrea	Castelli-hill, Susan	Castelluccio, K	Castillo, Kari	Castillo, Patricia	Castillo, Susan
Castillo, Victor	Castle, Allison	Castle, Bobbie	Castle, Sylvia	Casto, Toni	Castonguay, Carol
Castriota, Linda	Castro, Jon	Castro, Mafalda	Castro, Melisa	Castro, Michelle	Castro, Rafael
Castronovo, Catherine	Castto, Connie	Caswell, Nancy	Catala, Pierre	Catalanotto, Darren	Cataniarachlin, Christine
Cate, Deborah	Catenacci, Jeremy	Cathcart, Melissa	Catherine, John	Cathey, Maggie	Catlin, Linda
Caturay, Maria	Catzalco, Yolanda	Caudill, Lindsey	Caughman, Erin	Causer, Richard	Causey, Linda
Cavalier, Carol	Cavaliere, John	Cavanaugh, Daniel	Cavanaugh, Elaine	Cavanaugh, Terry	Cavazos, Mark
Cave, Jolene	Cavendish, Mary	Cawley, Valerie	Cawthra, William	Cazares, Arianna	Cazares, Juan
Cazares, Maria	Cease, Brett	Cease, Jeannie	Ceaser, Rosemarie	Ceban, Alexander	Ceccatelli, Linda
Cecchi, Roger	Cecere, Joan	Cechony, Janice	Cecil, Jan	Cecil, Michael	Cediel, German
Cedilla, Berenice	Cedillos, Marnie	Ceglia, Ann	Celenza, Rebecca	Cellini, Dorothy	Celt, Artemis
Cence, Jim	Cencula, Nancy	Cenni, Robert	Censorio, Linda	Centeno, Pamela	Centineo, Christine
Cento, Ilene	Cento, Salvatore	Centoni, Marilyn	Centonzio, Belgica	Cerda, Claudia	Cerisola, Francesca
Cermak, John	Cerniglia, Suzanne	Cerny, Jayne	Cerqua, Catherine	Cerrella, Joseph	Cerretani, Janet
Cerutti, Rick	Cerutti, Vince	Cervene, Amy	Cervenka, Kevin	Cervera, Isabel	Cetrone, Barbara
Chabot, Anne-lise	Chacey, Ron	Chacko, Kevin	Chadd, Terrance	Chadwick, Michael	Chadwick, Patricia
Chadwick, Sharon	Chae, Erin	Chafer, Clive	Chaffee, Sarah	Chai, Sylvia A	Chalfen, Karen
Chalfin, D.	Chalich, Diana	Challenger, Nanette	Chalmers, Alan	Chaloux, Andrea	Cham, Allen
Chambadal, Phil	Chamberlain, Clint	Chamberlain, Royal	Chamberlin, Linda	Chamberlin, Richard	Chamberlin, Ruth
Chambers, Barbara	Chambers, Barbara	Chambers, Becky	Chambers, James	Chambers, Leland	Chambers, Oscar
Chambers, Patricia	Chambers, Sharon	Chambless, John	Chambo, Tim	Champagne, Valerie	Champy, Cheryl
Chan, Denesa	Chan, Guy	Chan, Lesa	Chan, Nancy	Chan, Sonja	Chance, Betty
Chandl, Shirley	Chandler, Carol	Chandler, David B.	Chandler, Hannah	Chandler, Jeff	Chandler, Krystle
Chandler, Rita	Chandler, Susan	Chandra, Taressa	Chaney, Susan	Chang, Heather	Chang, Joyce
Chang, Nancy	Chang, Rebecca	Chang, Sharon	Chango, Alejandra	Chanin, Peter	Chanlatte, Cesar
Chanler, Alexander	Channell, Kyla	Chao, Nancy	Chapek, S.	Chapellier, Nancy	Chapin, Donna
Chapin, Heather	Chapin, Tom	Chapman, Alena	Chapman, Christina	Chapman, Edward	Chapman, Erik
Chapman, Hellene	Chapman, Kevin	Chapman, Lindsay	Chapman, Richard	Chapman, Rose	Chapman, Sam

Chapmanburson, Sandra	Chappell, Becky	Chappell, Carol	Chappell, Steven	Chaput, Rachel	Charboneau, Naomi
Charbonneau, C.	Charbono, Nancy	Chard, Sue	Charette, J	Charette, Karen	Charette, Tanya
Charlap, Donna	Charlebois, Stacie	Charles, Cassia	Charles, Dorian	Charles, Lenore	Charles, Mary
Charleton, Terry	Charlier, Thomas	Charlton, Jean	Charme, Deborah	Charnas, Kevin	Charter, Donna
Charter, Pat	Chase, Brenda	Chase, Cheryl	Chase, Gladys	Chase, Janelle	Chase, Janet
Chase, Jayni	Chase, Kathy	Chase, Laura	Chase, Lynne	Chase, Maggie	Chase, Robert
Chatelain, Kory	Chatham, Tina	Chatlain, Clark	Chatterji, Manjari	Chaudhry, Asif	Chaudhuri, Pakhi
Chauvin, Daniel	Chavez, Dan	Chavez, Daniel	Chavez, Michele	Chavez, Nola	Chavez, Richard
Chawla, Munish	Chays, Arlys	Cheatham, Greg	Cheatham, Linda	Checchia, Michele	Check, Pamela
Checker, Matthew	Cheek, Aimee Lee	Cheek-wooten, Dawn	Cheesman, Jean	Chelland, Ron	Chelune, Susan
Chemai, Beverly	Chen, Allan	Chen, Angela	Chen, Dan	Chen, Eric	Chen, Kim
Chen, Rena	Chen, Te-fen	Chenevert, Heather	Cheney, G.W.	Chenkin, Cari	Cheong, Christabel
Cheong, Eileen	Cheong, Leon	Chepernich, Johanna	Cherbavaz, Dorothy	Cherdon, H.	Cherepes, Patricia
Cherney, Herman H	Cherney, Mary	Chernoff, Elaine	Cherrett, Nia	Cherry, Gina	Cherry, James
Cherry, Lois	Cherry, Shirley	Cherubin, Elizabeth A	Chesebro, Eric	Chesta, Michele	Chester, Philip
Cheston, Julia	Chevalier, Cathyrn	Chevalier, Deborah	Chew, Priscilla	Cheyney, Kat	Chhp, Jeannette Dean
Chi, Animae	Chiang, Colleen	Chiang, Laura	Chiappa, Russell	Chiariello, Anthony	Chick, Greg
Chicklas, Lewis	Chico, Laura	Chieffo-young, Soren	Chiesi, William	Chilcoat, Rose	Child, Janine
Child, Katrina	Childers, Deborah	Childs, Christie	Childs, Marga	Childs, Susan	Chilleme, Joseph
Chilson, Jerry	Chilton, Cindy	Chimiklis, Lynne	Chimis, Robert	Chin, Eugene	Chin, Jean
Chines, Peter	Ching, Mary	Chinigo, Brittany	Chinitz, Joan	Chin-onn, Kenneth	Chiodini, Chuck
Chiodo, Aria	Chiodo, Beth	Chiodo, Diane	Chipman Sisson, Valerie	Chirigotis, Helen	Chischilly, Jane
Chisholm, Holly	Chisholm, Judi	Chismar, Nancy	Chitouras, Andrea	Chittick, Virginia	Chittum, Toby
Chitwood, Melissa	Chiu, Chihlan	Chivian, Susanna	Chlopan, Mary Ann	Chmielewski, Christine	Choate, Robin
Chockla, William	Chohon, Christina	Choi, Kay	Chong, Albert	Chong, Camille	Chopyak, Anne
Choquet, Herta	Chorba, Louis	Chorostecki, Gene	Chott, John	Chou, Ana	Chou, P
Chow, Paula	Choy, She'ree	Chraft, Ken & Andrea	Christ, Silvia	Christensen, Kcarolina	Christensen, Martha
Christensen, Roger	Christenson, Amy	Christenson, Carla	Christi, David	Christian, Adina	Christian, B. Jane
Christian, Evanne	Christian, Kathryn	Christian, Linda	Christian, Madelyn	Christiansen, Gerald	Christiansen, Susan
Christianson, Alan	Christie, Bill	Christine, Dena	Christine, Elizabeth	Christman, Dave	Christman, Mary
Christmas, Katharine	Christo, Jeffrey	Christoferson, Pam	Christoff, Stephanie	Christoffer, Courtney	Christopher, Bruce
Christopher, David	Christopher, Joan	Christwitz, Barbara	Christy-boyden, Carolyn	Chrupka, Jeremy	Chryst, Joan
Chu, Jonathan	Chu, Liana	Chubb, Mary	Chudy, Cathryn	Chudzik, Mark	Chul Kim, Hyun
Chun, Grace	Chung, K.	Chunn, Lilith	Church, Bev	Church, Glenn	Church, Jan
Church, Jane	Church, Janelle	Churella, Susan	Chuter, Kathleen	Chutich, Michael	Chuven, Jeremy
Chwalisz, Bart	Chwilka, Natalia	Chynoweth, Iris	Ciaccio, Brandon	Ciaffa, Karen	Ciampi, Helen
Ciardello, Carmen	Cibery, John	Cicale, Alex	Cicalese, Barbara	Cicchetto, Angelamaria	Cicerchi, Kent
Cignoli, Karen	Cilione Vet&teapartypatriot, Bruno F.	Cimadevilla, Diana	Cimino, Anthony	Cimino, Maryrose	Cimino, Patricia
Cimmiyotti, Cyd	Cinquigranno, Harold	Ciresi, Karen	Cirulnick, Paul	Cisneros, Bert	Cisney, Judy
Ciszek, Charlotte	Citarella, Judith	Ciuffini, Anthony	Civiletti, Leanne Claire	Claassen, Steve	Claerhout, Jessica
Claiborne, Gay	Clair, Germaine	Clair-howard, Maria	Clancey, Jasmine	Clancy, Dawn	Clancy, John
Clapp, Jonathan	Clapsadle, Dan	Clare, Simone	Clark Jr, James A	Clark, Anne	Clark, Ashley
Clark, Beverly	Clark, Carl	Clark, Carolyn	Clark, Cary	Clark, Christopher	Clark, Diane
Clark, Dick	Clark, Doug	Clark, Douglas	Clark, Elizabeth G.	Clark, Heinke	Clark, Howard
Clark, Jack	Clark, Jamie	Clark, Jennifer	Clark, Jenny	Clark, Jessica	Clark, Jewel
Clark, Jon	Clark, Joyce	Clark, Joyce	Clark, Judy	Clark, Judy	Clark, Julie
Clark, Kathy	Clark, Kenneth	Clark, Kerry Ellen	Clark, Kevin	Clark, Kevin	Clark, Marcia
Clark, Margaret J.	Clark, Marilyn	Clark, Marion	Clark, Mark	Clark, Martina	Clark, Mary Ann
Clark, Milton	Clark, Monique	Clark, Morgan	Clark, Nancy	Clark, Pamela	Clark, Richard
Clark, Samuel	Clark, Sheila	Clark, Steph	Clark, Stephanie	Clark, Stuart	Clark, Susan
Clark, Thomas	Clark, Todd	Clark, Toni	Clark, Valerie	Clark, Warren	Clarke, Bob

Clarke, Charles	Clarke, Eithne	Clarke, Gerald	Clarke, J	Clarke, Karen	Clarke, Karl
Clarke, Kelly	Clarke, Lisa	Clarke, Marcia	Clarke, Seth	Clarke-jackson, Olga	Claro, Josel
Clasemann, Joel	Class, Robyn	Classen, Meryl	Claudia, Sister M.	Claunchmeyers, Jennifer	Claus, Carol
Claus, Norman	Clausen, Daphne	Clausen, James	Claussen, Standley	Claxton, Shannon	Clay, Jennafer
Clay, Margaret	Clay, Metric	Clay, Susan	Clay, Yolanda	Claybrooks, Sylvia	Claymore, Thomas
Claypool, Roberta	Clayton, Luanne	Clayton, Marilynn	Clayton, Ronald	Claytor, Patricia	Cleary, Annette
Cleary, Colleen	Cleary, Maria	Cleaveland, Beth	Cleavenger, Brad	Cleaves, Martha	Cleaves, Robyn
Clegg, William	Cleghorn, James	Clem, Kath	Clemens, Beatrice	Clemens, Geralyn	Clemens, Joyce
Clemens, Robert	Clement, Daral	Clement, Leslie	Clement, Michael	Clemente, Alice	Clements Owens, Carly
Clements, Charles	Clements, Joyce	Clements, Matt	Clements, Patricia	Clements, Rhonda	Clerke, Greg
Cleveland, George	Cleveland, J.	Cleven, Heidi	Clevenger, Karen	Clewell, Gregory	Clewett, Barbara
Clifford, David	Clifton, Brian	Clifton, Wendy	Clig, George	Climent, Don	Cline, Andi
Cline, Brandy	Cline, Colleen	Cline, David	Cline, Jenn	Cline, Lorraine	Cline, Rev. L.
Cline, Terry	Clinger, Deanna	Clinger, Linda	Clinton, Daniel	Clipka, Mike	Cloud, Jarrett
Clough, Francine	Clouser, Devlon	Clow, Dale	Clowder, Nell	Clower, Elizabeth	Cloyd, Allyson
Cloyd, Neil Michael	Clueit, Gary	Cluney White, Terryl	Clusen, Charles	Clutter, Heather	Clymer, Elliot
Co, Elizabeth	Coakley, Loras	Coakley, Michele	Coan, Andrew	Coari, Christine	Coast, Julia
Coate, Linda	Coates, Judith	Coates, Portland	Coats, Susan	Cobabe, Terry	Cobarrubias, Frank
Cobb, Diana	Cobb, Dr. Stephen & Barbara	Cobb, Kylie	Cobb, Mary	Cobb, Rick	Cobb, Robert
Cobb, Sandra	Cobb, Tanya	Cobban, Ann	Cobert, Michelle	Coble, Teresa	Cocci, Roberto
Cochems, Helen	Cocheo, Laurie	Cochran, Dale	Cochran, Greg	Cochrane, Julia	Cocke, Jim
Cockerham, Jamison	Cockerill, Claudia	Coco, Joseph	Cocoanto, Paul	Codd, Michael	Codding, Don
Coddington, Carol	Cody, John	Cody, Susan	Coe, Casey	Coe, Daniel	Coe, Judith
Coe, Lauren	Coe, Marquita	Cofer, Rosalba	Coffee, Eileen	Coffey, Catherine	Coffey, Gerry
Coffey, Margery	Coffey, Richard	Coffi, Susan	Coffin, Kim	Coffman, Cameron	Coffman, Hannah
Coffman, Kathy	Coffman, Lawrence	Cogan, David	Cogan, Marjorie	Cogar, Nicki	Coglianese, Daniel
Cohan, Mark	Cohen, Abby	Cohen, AM	Cohen, Ann	Cohen, Asher	Cohen, Astrid
Cohen, C A	Cohen, Donna	Cohen, Edith	Cohen, Eleanor	Cohen, Harriet	Cohen, Hyman
Cohen, Isabel	Cohen, Jake	Cohen, Justin	Cohen, Justin	Cohen, Larry	Cohen, Lindsey
Cohen, Mark	Cohen, Mark	Cohen, Mitch	Cohen, Myrna	Cohen, Naomi	Cohen, Richard
Cohen, Rochelle	Cohen, Ronald	Cohen, Shannon	Cohen, Steve	Cohen, Susan	Cohen, Theresa
Cohen, Tova	Cohenour, Dolores	Cohen-sieg, Miya	Cohn, Ken	Cohn, Robert	Cohn, Sharilyn
Coker, Gina	Coker, Kat	Coker, Sharon	Colarusso, Louise	Colbath, Preston	Colborn, Sheree
Colburn, Debbie	Colburn, Sean	Colburn, Shar	Colby, Helen	Coldwell, Sherilyn	Cole, Bruce
Cole, C.	Cole, Carole Ann	Cole, Chris	Cole, Deborah	Cole, Dori	Cole, Dorothy
Cole, Douglas	Cole, Eddie	Cole, Jean	Cole, Julian	Cole, Karen	Cole, Linc
Cole, Marcina	Cole, Margaret	Cole, Mary Lou	Cole, Michelle	Cole, Penelope	Cole, Sarah
Cole, Stephanie	Cole, Teresa	Cole, Theresa	Cole, William	Cole-dai, Phyllis	Coleman, Barbara
Coleman, Bobby	Coleman, Brenda	Coleman, Claire	Coleman, Dorothy	Coleman, Ellis	Coleman, Fred
Coleman, Helena T.j.	Coleman, Jim	Coleman, John	Coleman, Jonah	Coleman, Kathleen	Coleman, Lissa
Coleman, Malinda	Coleman, R	Coleman, S	Coleman, Seaghan	Coleman, Sophia	Coleman, Victoria
Colerich, Edward	Coles, Herbert	Coles, Nathan	Colgan, Joe	Colina-lee, Lori	Colista, Gian
Collar, Michelle	Collazo, Clara	Collecchia, Geri	Collette, Anne	Colletti, Andrea	Collias, Elaine
Collier, Barb	Collier, Ralph	Collier, Rex	Collier, Wade L.	Collilns, Peggy S.	Collingwood, Kelly
Collingwood, Tim	Collins Jr, John	Collins, Ash	Collins, Barbara	Collins, Brenda	Collins, Carol
Collins, Carol	Collins, Carolyn	Collins, Dana	Collins, Eileen	Collins, Gail	Collins, Greg
Collins, Joseph	Collins, Joseph	Collins, Josh	Collins, K.	Collins, Kathleen	Collins, Kathy
Collins, Mary	Collins, Matthew	Collins, Mikie	Collins, Nan	Collins, Nancy	Collins, Pam
Collins, Rhonda	Collins, Richard	Collins, Susan	Collins, Teresa	Collins, Victoria	Collins, William
Collinsworth, Van	Collmeyer, Merlyn	Collom, Beth	Collon, Lisa	Colman, James	Colmenares, Juan
Colner, Daria	Colner, Samantha	Colombo, Jean	Colon Monette, Rachel	Colon, Bryanna	Colon, Carlos
Colon, Norma	Colony, Pamela	Colotti, Deborah	Colston, Laura	Colter, Alfred	Coltharp, Debbi
Coltman, Evelyn	Colton, April	Colton, Jeff	Colucci, Sue	Colungacasillas, Angela	Colville, Roberta
Colvin, Bill	Colvin, Rev.	Colwell, Meagan	Colwell, Pam	Colwill, Kathleen	Colyer, Joni

Colyer, Leslie	Combatti, Millisa	Combes, Dale	Combes, Joan	Combs, Elizabeth	Combs, Mary
Comeau, James	Comella, John	Comer, Charles	Comko, Deborah	Commey, Donna	Commons, Michelle
Comparetta, Christopher	Compasso, Brian	Compton, Deb	Compton, Jeanette	Comrack, Janine	Comstock, Ginger
Comstock, Linda	Comstock, Sabrina	Conant, Craig	Conaway, Tara	Concilio, Ihm, Sr. M. Alphonsa	Condit, Stephen
Condo, Randy	Condon, Pat	Condron, Sharon	Conford, Daniel	Congdon, Dolores	Conger, Nancy
Conifer, Colleen	Conklin, Lindsay	Conklin, Lumarion	Conley, Loran	Conley, Lori	Conn Ii, Ronald D
Conn, Craig	Conn, Elizabeth	Conn, Joel	Conn, Patrick	Conn, Tracey	Conneally, Daniel
Connell, David	Connell, Rachel	Connelly, Walter	Conner, Art	Conner, Eileen	Conner, Jean
Conner, Jeffrey	Conner, Kathleen	Conner, Liz	Conner, Roy	Conner, Stacy	Connick, Cherie
Connolly, Charles	Connolly, Joe	Connolly, Marianne	Connon, Vicki	Connor, Eileen	Connor, Maggie
Connor, Roz	Connors, Joe	Connors, Rebecca	Conolly, Roxanne	Conoscenti, Paula	Conrad, Geraldine
Conrad, Lori	Conrad, Marc	Conrad, Mike And Jane	Conrad, Norm	Conradi, Laura	Conrath, Chris
Conroy, Beverly Ann	Conroy, Carly	Conroy, James	Conroy, James James	Conroy, Peggy	Conroygroves, Devin
Considine, Trudy	Constable, Lynda	Constance, Bianca	Constantin, Gloria	Constantino, Patricia	Constantino, Patti
Conte, Edward	Contessa, Lorenzo	Contessa, Nidhi	Conti, Becky	Conti, Joanne	Contini, Marcello
Contreras, Daniela	Contreras, Ellen	Contreras, Isabel	Contreras, Laura	Conway, James	Conway, Julianne
Conway, Margaret	Conwell, Doug	Cook Benjamin, Robert	Cook, Alena	Cook, Arlene	Cook, Bruce
Cook, Carol	Cook, Craig	Cook, Damon	Cook, Debra	Cook, Doug	Cook, E
Cook, Elizabeth	Cook, Glenn	Cook, Jan	Cook, Joyce	Cook, Kristin	Cook, Libby
Cook, Nena	Cook, Robert	Cook, Sabrina	Cook, Suzanne	Cook, Tammy	Cook, Terry
Cook, Whitney	Cooke, Bradley	Cooke, Donald	Cooke, Janet	Cooke, Jay	Cooksey, Karen
Cooksey, Keith And Barbara	Cooksey, Marti	Cooley, Dan	Cooley, Marian	Cooley, Richard E	Cooley, Sheila
Coolidge, Anita	Cooling, David	Cooluris, Helen	Cooney, Courtney	Cooney, Jamie	Cooney, Margaret
Cooney, Patricia	Coons, Christine	Coontz, Sharron	Cooper, Alice	Cooper, Brenda	Cooper, Carol
Cooper, Caryle	Cooper, Charlene	Cooper, Frank	Cooper, Isabella	Cooper, James	Cooper, James
Cooper, Janell	Cooper, Joanne	Cooper, Joseph	Cooper, Kathleen	Cooper, Lana	Cooper, Leann
Cooper, Margo	Cooper, Margo	Cooper, Marianne	Cooper, Marilyn	Cooper, Michael	Cooper, Pam
Cooper, Robert	Cooper, Susan	Cooper, Theodore	Cooper, Trisha	Cooper, Victoria	Cooper, Ying
Copas, DR	Cope, Peggy	Cope, Robert	Cope, Sandra	Cope, William	Copeland, Camille And Rick
Copeland, Harold	Copeland, Jeanette	Copeland, Linda	Copeland, Roxanne	Copeland, Rus	Copenhaver, Erica
Copenhaver, Patricia	Copes, Katie	Copestick, Will	Copp, Martha	Copp, Mary Lou	Copper, David
Coppersmith, Terri	Coppi, Maria	Coppola, Dawn	Coppola, Samantha	Coppolino, Phyllis	Coppotelli, Heide Catherina
Copps, Carlann	Coquet, Lorenzo	Corbett, Mary E.	Corbett, Patricia	Corbett, Patty	Corbett, Todd
Corbin- Beaver, Pamela	Corbin, Daniel	Corbin, Marion	Corbin, Sean	Corbin, Sharon	Corbin, Susan
Corbin, Thomas	Corbo, Doris	Corbran, Kelsey	Corcacas, Phyllis	Corcoran, J.	Corcoran, Kristen
Corcoran, Linda	Corcoran, Terry	Corcuera, Nelson	Corda, Kim	Cordasco, Gaetana	Cordeiro, Brock
Cordero, David And Ann	Cording, Harry	Cordio, Michael	Cordova, Jose	Corey, Heather	Coriell, Pauline
Corkett, Annmarie	Corkey, Peter	Corley, Bert	Corley, Nancy	Cormack, Carol	Cormack, Kayla
Cormia, Morgan	Cormia, Nancy	Cormier, Jeanne	Cormier, Joanne	Cormier, Marilyn	Cormier, Val
Cornejo, Karen	Cornelia, Jared	Cornelius, Diana	Cornelius, Donald	Cornelius, Nancy	Cornelius, Stacy
Cornell, Cynthia	Cornell, Ralph	Cornell, S	Cornell, Sandy	Cornell, Suzanne	Cornellio, Cathe
Cornely, John	Cornely, Kathy	Cornett, Gary	Corney, Richard	Cornish, Marianne	Corns, James
Cornwall, Tonya	Cornwell, Charlie	Coro, Ana	Corona, Laura	Corona, Norma	Corr, Carolyn
Corr, F	Corr, John	Corr, Marie	Corr, Maureen	Corrales, TC	Correa, Constanza
Correia, M. Cecilia	Correia, Mia	Corriere, Caryn	Corrigan, Jennifer	Corris, Joshua	Corriveau, Monique
Corry, Ronit	Cortes - Garesche, Judith	Cortes, Juan	Cortez, Mercedes	Cortez, Pablo	Cortimilia, Uta
Cortts, Cristian	Corum, D	Corvino, Sean	Corwin, Cecil	Corwin, Colette	Corwin, Diana
Corwin, Lynn	Corwin, Sule	Coryell, Scott	Corzatt, Karla	Corzo, Alex	Cosbey, Chris
Cosentino, Deborah	Cosgrave, Darragh	Cosgriff, Mark	Coshenet, Christophe	Cosmano, Theresa	Costa, Frances
Costa, Gabriel	Costa, Lynn	Costa, Mike	Costa, Philip	Costa, Sandra	Costa, Sandra

Costa-aine, Shane	Costanzo, Dawn	Costanzo, Joseph	Costas, George	Costello, Beverley	Costello, Carol
Costello, Jeff	Costello, John	Costello, Richard	Costello, Steve	Costenbader, Noreen	Costigan, Andrew
Costion, Steve	Costolo, Elaine	Cota, Kay	Cote, Renee	Cote, Tabitha	Cotham, Keith
Cotlow, Leslee	Cott, Jennifer	Cotta, Michael	Cotten, Mike	Cotterman, Diane	Cotton, Beverly
Cotton, Connie	Cotton, Stuart	Cottrell, Ricardo	Cottrill, Scott	Cotz, Elina	Couch, Dorothea
Couch, Norvelle	Couch, Sandra	Coughlin, Patricia	Coughlin, William	Couillerot, Fabrice	Coulouris, Fay
Couls, Carolyn	Coulson, Elyse	Coulter, Christa	Coulter, Huxley	Councilman, David	Counihan, Mary
Counterman, Jesse	Countryman, Tim	Countrymanmills, Gayle	Coursey, Christopher	Court Olson, R.	Court, Janet
Court, JF	Courtney, Brigid	Courtney, Courtney	Courtney, Donald	Courtright, Sally	Courts, John
Cousin, Wanzie And Charles	Cousins, Bronwen	Cousins, Vera	Coutant, Donna	Coutinho, Greg	Couture, Aimee
Couture, Louise	Couture, Marlyn	Couvrette, Sharon	Covalciuc, Marie	Covan, Burl	Covell, Sandi
Covelli, Christine	Covello, Suzanne	Cover, Kris	Cover, Lisa	Cover, Melissa	Covers, Gunther
Covey, Susan	Covi, Deborah	Coville, Danielle	Covington, Gaya	Covington, Lainie	Covington, Laurel
Covino, Robin	Cowan, Anthony	Cowan, Cath	Cowan, Catherine	Cowan, Christina M.	Cowan, Jan
Cowan, Leticia	Cowen, Karen	Cowger, Nancy L	Cowing, Lois	Cowles, Andrea	Cowles, Nicholas
Cowles, Traver	Cowperthwaite, Tanya	Cox, Andrea	Cox, Breeona	Cox, Frank	Cox, Jennifer
Cox, Jennifer	Cox, John	Cox, Katrina	Cox, Kim	Cox, Lisa	Cox, Louis
Cox, Marcia	Cox, Maria	Cox, Millicent	Cox, Molly	Cox, Myk	Cox, Sharon
Cox, Stacie	Cox, Susan	Cox, Valetta	Coyle, Tristen	Coyne Becker, Judy	Coyne, Colin
Coz, Ann	Cozad, Bren	Cozad, Devon	Cozart, Erin	Cozine, Deb	Cozza, Laurrie
Crabtree, Carolyn	Crabtree, Lynn	Craft, Karen	Craft, Robin	Cragin, Phyllis	Craig, Ann
Craig, Carol	Craig, Dana	Craig, Diane	Craig, Elizabeth	Craig, Ella	Craig, Emmeline
Craig, Gibson	Craig, Janet	Craig, Julie	Craig, Leonard	Craig, Melissa	Craig, Vernon
Craigen, June	Crain, Wanda	Cramer, Chris	Cramer, Kathleen	Cramer, Marta	Cramer, Paul
Cramer, Peggy	Cramer, Penny	Crandall, Analisa	Crandall, Neal	Crane, Andrea	Crane, Jeff
Crane, Marcella	Crane, Peter	Crane, Philip	Cranford Montgomery, Sharon	Cranford, Connie	Cranmer, Julia
Crannell, Raymond	Cranston, Thomas W.	Crase, Kirsten	Cratty, Bruce	Crawford, A.	Crawford, Allan
Crawford, Carol	Crawford, Christina	Crawford, Cindy	Crawford, Cynthia	Crawford, Dale	Crawford, David
Crawford, Jason	Crawford, Jean	Crawford, Judy	Crawford, Kwankisha	Crawford, Licia	Crawford, Morgan
Crawford, Phyllis	Crawford, Susan	Crawford, Tracy	Crawford, Valerie	Crea, Pastor Michaelvincent	Creamean, Sarah
Crean, Diana	Crean, Peter	Creech, Belinda	Creegan, Linda	Creel, Rob	Creighton, Dawn
Creighton, Nancy	Crellinquick, Shoshona	Crenshaw, Mairlyn	Crenshaw, Robert	Crenshaw, Shirley	Cresci, Melanie
Crescione, Hope	Crescitilli, Jeanette	Crespi, Sharon	Cresseveur, Jessica	Crest, Elle	Crestfield, Richard
Creswell, Linda	Creswell, Richard	Cretser, Cathy	Crews, Deborah	Crews-nelson, Sadie	Cribley, Diane
Crickard, Kim	Criddle, Gale	Crider, Nancy	Crider, Sandra	Crim, Noel	Crimmins, Mary Lou
Crisanti, Julianna	Crispin, Malinda	Crist, Kathy	Crist, William	Cristello, Dianna	Cristobal, Josie
Crist-whitzel, Janet	Critchlow, Penelope	Crittenden, Kathleen	Crittenton, Cynthia	Crivello, L	Croan, Stacy
Crocco, Frances	Croce, Hugh	Crocker, Gary	Crockett, J	Crockett, Landis	Crockett, Wanda
Croger, Theresa	Croke, Adrian	Crompton, Kamala	Cromwick, Bill	Cronas, Peter	Crones, Creg
Cronin, Brian	Cronin, Elizabeth	Cronin, Gary	Cronk, Ene	Cronk, James	Crook, Dustin
Crook, Paula	Crooks, Harold	Crosby, Debbie	Crosby, Nancy	Crosby, Stacey	Cross, Andrea
Cross, Heather	Cross, Jessi	Cross, Linda	Cross, Patricia	Cross, Russ	Cross, Skip
Crossley, Jean	Crotty, Helen	Crotty, John	Crouch, David	Crouch, Jill	Crouch, Michael
Crouse, Christopher	Crouse, Darcy	Crouse, Gray	Crovello, Theresa	Crow, Jeffrey	Crowden, James
Crowden, Michael	Crowell, Carol	Crowell, Lisa	Crowley, Brooke	Crowley, Joyce	Crowley, Kate
Crowley, Lawrence	Crown, Paula	Crowner, Judy	Crownover, Terry	Croxson, Linda	Crozer, Lois
Crozier, Don	Crozier, John	Crozier, Mary	Crozier, Richard	Cruchon, Gwen	Cruickshank, Ann Marie
Cruikshank, Anna	Cruise, Roger	Crum, Dorothy	Crum, Lee	Crumbaker, Alexis	Crump, Deborah
Crump, Diana	Crump, Renee	Crusha, Connie	Crutcher, Luella	Crutchfield, Carole	Cruz, Ana
Cruz, Jose	Cruz, Maria	Cruz, Marian	Cruz, Naomi	Cruz, Robert	Crystal, Marjorie
Csenge, Debra	Csenge, Rich	Cserr, Robert	Csolak, Janet	Csuhta, Tom	Cuadra, Jennifer
Cubeiro, Lisa	Cucuzza, Drew	Cuddy, Madir	Cuddy, Robert	Cuddy, William	Cudworth, Deborah

Cuervo, Heberth	Cuevas, Adriana	Cuevas, Carlos	Cuff Jr., Kermit	Cuff, Danny	Cuic, Nina
Culazzo, Gina	Culbert, L	Culbertson, Jon	Culhane, Lesley Pamela	Cullen, Hunter	Cullinan, Sarabeth
Cullison, Beth	Culloty, John	Culmore, Matthew	Culp, Barbara	Culp, Janet	Culver, Abigail
Culwell, Debra	Cumine, Sally	Cumings, Dawn	Cumming, Bruce	Cumming, Christine	Cummings, Alyssa
Cummings, Brenda	Cummings, Brian	Cummings, Erin	Cummings, Laura	Cummings, Leslie	Cummings, Loretta
Cummings, Mike	Cummings, Ryber	Cummingsc, Terrence	Cummins, Heather	Cundari, Joe	Cundiff, Robert
Cunha, Carlos	Cunnigham, Debra	Cunningham, Christa	Cunningham, Diane	Cunningham, Glenn	Cunningham, Jan
Cunningham, Janet	Cunningham, Jennifer	Cunningham, Mary	Cunningham, Sean	Cunningham, Sharon	Cunningham, Storm
Cunningham, William	Cupertino, Cristian	Cupp, Ellen	Cuprak, Elizabeth	Curci, Marjorie	Curdie, David
Curia, Peter	Curlette, Diane	Curley, June	Curley, Maureen	Curlis, Mike	Curmano, Billy
Curow, Jerry	Currah, Nancy	Curran, Barbara	Curran, Michelle	Curran, Tim	Currie, Marianne
Currie, Theresa	Curry, Anne	Curry, Bill	Curry, Jeff	Curry, Marcia	Curry, Phil
Curry, Roy	Curry, Tina	Curtin, Kevin	Curtin, Melissa	Curtis, Cathy	Curtis, Cinta
Curtis, Connie	Curtis, Dean	Curtis, Glenn	Curtis, Hani	Curtis, Jennifer	Curtis, John
Curtis, Judith	Curtis, Margrete	Curtis, Marie	Curtis, Michelle	Curtis, Pam	Curtis, Richard
Curtis, Robbi	Curtis, Scott	Cushing, Barbara	Cushing, Michael	Cushing, Nancy Jane	Cushing, Patsy
Cushman, Anna	Cushwa, Michael	Custin, Ren	Cuthbert, Donna	Cutler, Annalisa	Cutler, Barry
Cutler, Edward	Cutler, Keith	Cutler, Kim	Cutler, Robin	Cutschall, Acadia	Cutts, Bruce
Cutty, Donald	Cuza, Alison	Cuzzocreo, J.	Cybyk, Maria	Cypher, Steven	Cyr, Kaitlyn
Cyriac, Cigy	Czamanske, Gerald	Czarapata, Jasmin	Czarnecki, Virginia	Czarnik, George	Czeblakow, Magdalena
Czech, Rachel	Czerniak, Jim	Czingula, Christian	Czinski, Margo	Czipa, Patti-ann	Czykieta, Zygmunt
D, Andie	D, Donna	D, Rita	D, S	D, Sharron	D., Brooke
Daane, Donna	Daasyaananda, Swami	Dabreu, Janet	Dabrowski, Izabella	Dace, Edward	Dace, Letitia
Dacey, Judith	Daerda, Nathan	Daghlian, William	Dague, Barbara	Dahill, Lisa	Dahl, Christin
Dahl, Genevieve	Dahl, Thomas	Dahl, Yolonda	Dahlen, Beverly	Dahlgren, Deborah	Dahlgren, Louise
Dahlgren, Phd, Mr. Shelley	Dahlin, Nikki	Dahlquist, Thomas	Dahlstrom, David	Dahn, Carl J	Daigle, Abbie
Daigle, Claudia	Daigle, Robert	Dail, Simone	Dailey, Eileen	Dailey, Rebecca	Dailey, Terry
Daily, G Allen	Dakouzlian, Marge	Dal Cais, Sandra	Dalaire, Lise	Dalby, Mike	Dale, Barbara And Jim
Dale, Garry	Dale, Rainey	Dale, Robert	D'alessandro, Keith	Dalessandro, Susan	D'alessandro, Susan
Daley, Darren	Daley, Karen	Daley, Liz	Dalinowski, M Kimberly	Dalit-pierson, Relita	Dalke, Laurie
Dallal, Rose	Dallas, Polly	Dalley, Vicki	Dallin, Eric	Daloia, Lisa	Dalrymple, Deborah
Dalsanto, Susan	Dalton, Brian	Dalton, Denise	Dalton, Jann	Dalton, Jill	Dalton, Laura
Dalton, Richard	Dalton, Sandra	Dalvesco, Gina	Daly, Chuck	Daly, Dorcas Marie	Daly, Jeanne
Daly, Leslie	Daly, Linda	Daly, Nancy	Daly, Sharon	D'amario, Ronnie	D'amato, Bob
Dame, Laura	Damerell, Gina	Dameron, Jessie	Dameron, Susan	Damon, Chris	Damon, James
D'amore, Marie	D'amour, Roland	Dampier, Jamie	Damrel, Sean	Dana, Dianne	Dana, Krista
Dance, Scott	Dancer Iii, Andrew	D'andrade, Nina	Dane, Ronald	Danehy, Cecile	Danesi, M.lucilla
Danforth, Tamera	D'angelo, Jennifer	Dangelo, Joseph	D'angelo, Leslie	D'angio, Judith	D'angio, Vivian
Danhauer, Mary	Daniel, AL	Daniel, Barbara	Daniel, Dominique	Daniel, Gilmore	Daniel, Jodi
Daniel, Julie	Daniel, Kian	Daniel, Laurie	Danielczyk, Matthew	Daniell, Lawrence	Daniels, Alkena
Daniels, Bradley	Daniels, Carolyn	Daniels, Cheryl	Daniels, David	Daniels, Deborah	Daniels, Elizabeth
Daniels, Elliot	Daniels, George	Daniels, Marcella	Daniels, P. R.	Daniels, Shannon	Daniels, Stephen
Daniels-lee, David	Danielson, Dana	Danks, Lois	Dann, Janet	Danna, Marie	Dannals, Donna
Dannelleymccree, Sylvia	Danner, Jennifer	Danner, John	Danner, Morgan Luciana	Dannhardt, Beth	Danowski, K
Dantuono, E	Danu, Ambrosia	Danzenbaker, Jim	Danzik, Angela	Daraio, Joseph	Darby, Catherine
Darby, Chan	Darby, Loisann	Darby, Sara	Darby, Tracy	D'arco, Silvio	Dare, Valerie
Darga, Kellyann	Daria, Lynette	Darin, Linda	Darlene, Dr.	Darling, Barbara	Darling, Carrie
Darling, Julie	Darling, Roxy	Darnell, Janice	Daroczy, Peter	Darovic, Elizabeth	Darr, Joyce
Darrach, Garth	Darrah, Kathleen	Darst, Caroline	Dartez, Carroll	Darvishi, Julian	Darwin, Holly
D'ascoli, Camille	Dash, Andrea	Dassel, Kathleen	Dassing, Dwayne	Daugharty, Kevin	Daugharty, Patty
Daugherty, Charles	Daugherty, Sandra	Daughtrey, Rodney	Daukas, Lina	Daumas, Rossana	Davenport, Christanne
Davenport, Donna	Davenport, Lyndhann	Davenport, Susan	Daversa, Frank	Davey, Cinthia	Davey, Marilyn
Davey, Robert	David, Betty	David, Lin	David, Marc	David, Rebecca	Davidson, Ann

Davidson, Annie	Davidson, Barbara	Davidson, Barbara	Davidson, Beth	Davidson, Linda	Davidson, Lisa
Davidson, Maggie	Davidson, Michelle	Davidson, Nicholas	Davidson, Robert	Davidson, Sharon	Davidson, Sheena
Davidson, Stuart	Davidson, Tracey	Davidson, Vicky	Davie, Michael C	Davies, Aaron	Davies, Barbara
Davies, Diana	Davies, Dorothy L	Davies, Karen	Davies, Karin	Davies, Laura	Davies, Ronnye
Davies, Steven	Davies, Sue	Davies, T.J.	Davies, Valerie	Davila, Matthew	Davila, Norma
Davis I, Darryl A.	Davis, Adam	Davis, Albert	Davis, Andy	Davis, Angelika	Davis, Antonette
Davis, Barbara	Davis, Beverly	Davis, Bill	Davis, Bonnie	Davis, Brad	Davis, C.J.
Davis, Carissa	Davis, Carla	Davis, Chrysantha	Davis, Crystal	Davis, Daniel	Davis, David
Davis, Deana	Davis, Deborah	Davis, Donna	Davis, Elizabeth	Davis, Gayle	Davis, Glenn
Davis, Heidi	Davis, J L	Davis, Jacob	Davis, James	Davis, Janet	Davis, Janet
Davis, Jason	Davis, Jeff	Davis, Jessica	Davis, Joan	Davis, Joan	Davis, John
Davis, John & Patricia	Davis, John P	Davis, Katherine	Davis, Kelly	Davis, Kim	Davis, Laurie
Davis, Liora	Davis, Liz	Davis, Marie	Davis, Marilyn	Davis, Mary	Davis, Meg
Davis, Melissa	Davis, Michelle	Davis, Mike	Davis, Morton	Davis, Nancy	Davis, Norman
Davis, Patricia	Davis, Ramona	Davis, Richard	Davis, Robin	Davis, Ryan	Davis, Ryan
Davis, S. Elaine	Davis, Sage	Davis, Sandra	Davis, Sharon	Davis, Sharon	Davis, Sharon
Davis, Shonna	Davis, SJ	Davis, Susan	Davis, Susan	Davis, Susan	Davis, Sydney
Davis, Tamekka	Davis, Tannya And Aaron	Davis, Terry	Davis, Theresa	Davis, Tim	Davis, Timothy
Davis, Todd	Davis, Valerie	Davis, Vera	Davis, Vicki	Davison, Alexandra	Davison, Jane
Davison, Margaret	Davison, William	Daw, Mary	Dawkins, Joshua	Dawley, Thomas	Dawson, Cindy
Dawson, Edouard	Dawson, Elizabeth	Dawson, Lynda	Dawson, M. Joan	Dawson, Shawn	Dawson, Yvonne
Dawsonrhodes, Juanita	Day, Charlie	Day, Cris	Day, Denise	Day, Diane	Day, Edward
Day, Emmae	Day, Jean	Day, Jennifer	Day, Joanne	Day, Joe	Day, Kathy
Day, Kristofer	Day, Margaret	Day, Victoria	Daynes, Measha	Dayton, Christine	Dayton, Ruthanne
Dazzi, Andrea	De Aguiar, Cordelia	De Andino, Luis	De Andrade, Luci	De Angelis, Rosella	De Angelis, Silvana
De Blois, Claudio	De Caccia, Kristen	De Castro, Brian	De Cecco, Jorge	De Cecco, Jose	De Crozuc, Erika
De Dea, Robert	De Feo, Joseph	De Forest, John	De Gaspe, Sharon	De Grassi, Alexancer	De Gregorio, Ewald
De Gregorio, Lino	De Greve, Beatrix	De Groot, Pat	De Guardi, Janet	De Guerville, Diana Huet	De Jasu, Barry
De Jesse, Lisa	De Jesus, Monique	De Jong, Allison	De Jonge, Hope	De Kay, Matt	De Kozan, Lisa
De La Cruz, Noel	De La Fuente, Evonne	De La Garza, Nancy	De La Mare, Russell	De La Riva, Oscar	De La Rosa, Marco
De La Rosa-young, Maria	De La Torre, Temy	De La Tour, Shatoiya	De Leon Jr, Rafael	De Leon, Sara	De Leon, Shira Mendes
De Los Santos, Silvia	De Luca, Md, Mary L	De Maestri, Marie Jo	De Moss, John	De Neeve, Fay	De Oca, Christina Montes
De Oca, Dayanara Montes	De Oro, Javier Garcia	De Palo, Leslie	De Pinto, Anne	De Quay, Rutger & Emily	De Rivera, Adriana Nino
De Rosa, Kirsten	De Ruysscher, Hannah	De San Roman, Gisela	De Santis, Tara	De Shon, Ronald	De Silva, Ranjit & Thilani
De Sio, Elisse	De Souter, Eileen	De Stefano, Denise	De Veer, Catherine Van	De Vegvar, Carol Neuman	De Vengoechea, Manuel
De Vier, Kayleen	De Villers, Frantoise	De Vos, Philip	De Vournai, Robb	De Vries, Dolores	Deadman, Mary
Deakins, Don	Deal, Brandie	Deal-tyne, Sheri	Dean, Carol	Dean, Cindi	Dean, James
Dean, June	Dean, K Michael	Dean, Sally	Dean, Shirley	Dean, Spencer	Dean, Sue E.
Dean, Susan Dean	Deane, James	Deangelis, Michael	Deangelis, TC	Deans, Dan	Deans, Glenn
Deapen, Kristopher	Dearborn, Carol	Dearborn, Karen	Dearden, Veronica	Dearien, Jay	Dearing, Deb
Dearnaley, Carol-ann	Deason, Bartley	Debbs, Joshua	Debell, Carol	Debing, Therese	Deblase, Renetta
Debrayanna, Tom	Decargouet, Yves	Decarla, Tina	Decastro, Ines	Decesare, Dr. Stephen	Dechristopher, Kelly
Deciccio, Robyn	Decie, Kevin	Deck, Don	Deck, Margaret Anne	Deckel, Karen	Decker Caprese, Dody
Decker, Craig	Decker, Judd	Decker, Ray	Decker, Sandra L.	Decker, Vivian	Decktor, Shulamit
Declementi, Camille	Decota, James	Decraemer, Mary	Decrescenzo, Jocelyn	Dedashti, Sheedy	Deddy, John
Dede, Kisten	Dederer, Mary	Dee, Jim	Deehan, Thomas	Deel, Ester	Deen, Sheleeza
Deer, Kathy	Deering, Edward	Dees, Louis	Defauw, Rachel	Defazio, Richard	Defee Mendik, Natalie
Defelice, Paula	Deferie, Steph	Defield-ostrom, Madisyn	Defrancia, Edward	Defriesse, Frederick	Defrin, Robert
Degenhart, DM	Degeyter, Pamela	Degginger, Phil	Degolia, Rick	Degooyer, Jr., Dan	Degooyer, Stacey
Degraw, Catherine	Degraw, Jenny	Degree, Dagmar	Degroff, Dorinda	Degroodt, Galen	Degroot, Donald
Degrow, Kristopher	Degutis, Paatricia	Dehart, Joanne	Dehart, Mary Michele	Deheck, M.	Dehestani, Nahid

Deibel, Jeannie	Deibel, Karyn	Deiss, Joseph & Eileen	Deist, Barry	Deitch, Betty	Deitschel, PJ
Dejesus, Jose	Dejesus, Margaretha	Dejong, Sjoerd	Del Balso, Claudia	Del Colle, Ray	Del Pero, Gayl
Del Plato, Anthony	Del Prado, Anne	Del Prete, Margot	Del Rio, Benigno	Del Rio, Martha	Del Rio, Roselia
Del Rose, Dorothy	Del Valle, Lucy	Delachartre, Eve	Delacroix, Christopher	Delacruz, Patricia	Delagarza, Adrian
Deland, Tara	Delander, Kathleen	Delaney, Linda	Delao, Jennifer	Delapena, Pat	Delaplaine, Kirk
Delattre, Angelique	Delauro, Joan	Delcore, Ursula	Delegal, Thomas	Deleon, Nubia	Delgado, Ana
Delgado, Barbara	Delgado, Crystal	Delgado, Margie Victoria	Delgado, Victor	Delin, Donna	Delisi, Donna
Dell, Dorothea	Della, Tonu	Dellacorte, Maria	Dellaguardia, Eva Lynn	Dellamonica, Ann	Dellapenna, Mike
Dellapina, David	Delle, Monika	Dellinger, Jesse	Dellinger, Stacy	Dellinger, Tracey	Delmar, Shawn
Delmestri, Barbara	Delong, Bruce	Delong, Pierre	Delorenzo, Peter	Delp, Bridgett	Delson, Dave
Delson, Marilyn	Deltognoarmanasco, John	Deluca, Greg	Delucca, Robert	Delusso, Donna	Delutis, Joyce
Delvecchio, Cheryl	Delverne, Dell	Demaddalena, Deborah	Demar, Rachael	Demarais, Jackie	Demarco, Joseph
Demaree, Patricia	Demarestparaan, Mary	Demark, Christi	Demars, Mattheew	Demars, Mike	Demartin, Renee
Demartino, Jesse	Demaske, Dawn	Dematteis, Lou	Dembroff, Hillary	Dembski, Paul	Deme, Darla
Demeritt, Kathryn	Demers, Michele	Demeter, Barbara	Demetrion, Martha	Demetropoulos, Hillary	Demin, Vladimir
Demint, Mary	Demonio, Angely	Demott, Lisa	Dempsey, Kelley	Dempsey, M.J.	Dempsey, Sheila
Demuro, Sarah	Demyanovich, Desiree	Deneault, Donna	Deneff, James	Dengis, Janice	Denicola, Henry
Denis, Cheryl	Denis, Isabelle	Denis, Jessica	Denis, Linda	Denison, Tom	Denk, Chuck
Denko, Paul	Denman, Pam	Dennehy, LJ	Denning, Cecilia	Denning, Maureen	Dennis, A.
Dennis, Gudrun	Dennis, Helenea	Dennis, Joseph	Dennis, Kathleen	Dennis, Timothy	Dennison, Brett
Dennison, Philip	Denniston, Ethan	Denniston, James	Denny, Mahi	Denny, Patricia	Denny, Sean
Denoncourt, Mary Beth	Denovan, Rory	Densmore, Teresa	Denson, Barbara	Dente, Ann	Dentis, Amy
Denton, Michael	Denton, Toni	Denton, Zenaida	Dentz, Rebecca	Depalma, Donna	Depalma, Vera
Depaso, Virginia	Depaz, Nim	Deppe, Md, Susan	Depriest, Bridget	Deptula, Angie	Deptula, Cathy
Dequasie, David	Der, Don	Derbigny, Arthur	D'ercoli, Nan	Derderian, Sheryl	Derey, Maura
Derieg, GW	Deringer, Dorothy	Derloshon, Tammy	Derosa, Debbie	Derosa, Tracey	Derose, Liz
Deroy, AL	Derrickson, Ray	D'errico, Didi	Dersch, Lou	Desai, Apsara	Desantis, Megan
Desarno, Victoria	Deschere, Ken	Desgrandchamp, Milton	Desharnais, Jodi	Desi, Michael	Desimone, Ciana
Desjardin, Marie	Desjarlais, Marie	Deslatte, Darrick	Desler, Elizabeth	Desmarais, Dennis	Desmarais, Lauri
Desmarais, Michael	Desmet, Clancy	Desroches, Don	Desrosiers, Carolyn	Destefano, Robert	Destephano, Nicole
Destro, Greg	Detato, Susan	Detering, Brandt	Dethlefsen, Michaela	Detlie, Cydney	Detrick, Mary
Dettmann, J W	Detweiler, John	Detwiler, Claudia	Deubner, Mark	Deucher, Clare	Deupree, Danie
Deur, Tonia	Deutsch, Diane	Deutsch, Marshall	Deutsch, Steven	Deva, Saurabh	Devakow, Stephen
Devaney, Robin	Devault, Judy	Deveraux, Marc	Devereaux, Maureen	Devereaux, Sam	Deville, Lisa
Devillier, Azarias	Devilliers, Maxime	Devine, Carol	Devine, Joanne	Devine, Jodi	Devine, Judith
Devine, Lauren	Devine, Mandy	Devinney, Claudia	Devito, Leah	Devlin, Arlene	Devlin, Donna
Devlin, Felicity	Devlin, Gene	Devlin, Megan	Devoe, Riki	Devoid, Jesse	Devoist, Robyn
Devore, William	Devos, Kathy	Devoss, Carol	Devoto, Anthony	Devries, Kathleen	Dew, Robert
Dew, Wendy	Dewan, Donna	Dewar, Pat	Dewees, Kathryn	Dewey, Arwen	Dewey, Mora
Dewhirst, Emma Jo	Dewig, Margie	Dewit, Gloria	Dewitt, Amy	Dewitt, Linda	Dewitt, Susan
Dewolf, Jennifer	Dewolfe, Pat	Dewoody, Kimberly	Dexter, Michelle	Dexter, Russell	Dey, David
Deyoung, Frank	Deyoung, Patty	Deysher, Anne	Dezendorf, Andrea	Di Benedetto, Rainbow	Di Carlo, Susan
Di Flaviano, Mary Ann	Di Mizio, Giancarlo	Di Vittorio, Diane	Diagosta, Judy	Diamond, Albert	Diamond, Ann
Diamond, Jeffrey	Diamond, Laurie	Diamond, Mitchell	Diamond, Nicholas	Diamond, Nichole	Diamond, Wendy
Diamondstone, Esther	Dian, Lisa	Diana, Debra	Diana, Debra	Diana, Patty	Dianich, A Michael
Diaz Hernandez, Maria Isabel	Diaz, Jessy	Diaz, Jose	Diaz, Kody	Diaz, Liliana	Diaz, Martha
Diaz, Mayra	Diaz, Sarah	Diaz, Tony	Dibb-, Carol	Dibble, Jean	Dibble, Kerry
Dibenedetto, Richard	Dicaprio, Carol	Dichiara, Tim	Dicicco, Steven	Dick, Marianne	Dickason, Katie
Dickemann, Jeffrey	Dicken, Donald	Dickens, Catrina	Dickerson, Susan	Dickerson, Suzanne	Dickersonrynberg, Marjori

Dickey, Laura	Dickey, Marilyn	Dickinson, Brian	Dickinson, Jessa	Dickinson, Marcia	Dickinson, Susan
Dickler, Deneen	Dicks, Timothy	Dickson, Christina E	Dickson, Janet	Dickson, Michele	Dicostanzo, Jaclyn
Dicus, Laura	Diderrich, Jim	Didier, M.d., Rochelle	Didomenico, Dianne	Didomenico, Joelle	Didonato, Frank
Diebold, Rob	Dieckmann, Don	Diederichs, Barbara	Diedrich, Charlotte	Diedrick, Marian	Diegoli, Debra
Diehl, Margaret	Diekmann, Jean	Diemand, Grace	Diemert, Ryk	Diener, B. Thomas	Diepholz, Trudy
Dierig, John	Dieringer, Irini	Dieringer, Regine	Dierks, Beth	Dierks, Dick	Diermier, Jessica
Dieter-brabant, Pallas	Dietrichjones, Sharon	Dietterich, Lee	Dietz, Jennielee	Dietz, Leada	Dietzer, Margot
Difante, Diane	Difeo, Jen	Difonzo, Gabrielle	Difrank, Linda	Diggle, Gloria	Diggs, Joan
Digiannantoni, Theresa	Digiore, Michael	Digiovanni Jr., Robert B.	Digiovanni, Robert	Digirolamo, Janice	Digness, Warren
Dilallo, JO	Dildine, Charles	Dileo, Carmine	Dill, Elizabeth	Dill, Laura	Dillard, Cat
Dillard, Nancy	Dillard, Sherrill	Dillard, Terry	Dilley, Eric	Dilley, William	Dillingham, Eldon
Dillingham, Mark	Dillman, Christine	Dillner, Jean	Dillon, Christi	Dillon, Christopher	Dillon, Edward
Dillon, Hester	Dillon, Maddie	Dillon, Paul	Dillon, Shannon	Dillon, Sheila	Dills, Susan
Dilts, Brian	Dimaggio, Joseph	Dimaio, Mercedes	Dimarco, Debra	Dimarco, Ross	Dimarco, Tina
Dimattia, Nadia	Dimmick, Jeanine	Dimmock, Susan	Dimter, Katie	Dinan, Jean	Dine, Elsa
Dineen, Bill	Dineen, Charles	Dinehart, Sue	Dinell, Alexander	Dingle, Karen L	Dingman, Amy
Dingman, Terrall	Dinhofer, Jacalyn	Dinicola, Joseph	Dinino, Margel	Dinino, Mary	Dinkin, Tracey
Dinneen, Dolores	Dinnen, Edward	Dinsmore, James	Dinsmore, Nancy Jo	Dinucci, Pam	Dion, Eve
Dion, Patricia	Dipaola, Denise	Dipaola, Marisa	Dipasquale, Zachary	Dipinto, K	Dippre, Dawn
Direnzo, Jennifer	Direnzo, Kristen	Dirnbach, Boris	Disalvatore, Dominique	Disalvatore, Felicia	Disante, Don
Disend, Nadya	Diskin, Patricia	Dispigno, Peter	Diss, Marybeth	Ditieri, Lawrence	Ditizio, Vincent
Ditore, Steve	Ditton, Judy	Diveley, Laura	Divens, Alicia	Divett, Alexa	Divito, Marty
Dix, Elaine	Dix, Sally	Dix, Teresa	Dixon, Bruce	Dixon, Joanne	Dixon, Joyce H
Dixon, Mary	Dixon, Pam	Dixon, Steve	Dixon, Steve	Dixon, Susie	Dixon, Thad
Dizin, Debra	D'light, Doctor	Dmitrievodier, Ludmila	Dmukauskas, Barbara	Do, Chinh	Doan, Hanh
Doan, Leslie	Doane, Mary	Dobbelaere, Susan	Dobbins, Leonie	Dobbins, Robert	Dobeck, Irini
Dober, Sofia	Dobrovolny, Carol	Dobrowolski, Bob	Dobrowolski, Nicole	Dobson, Larry	Dockins, Donna
Doctor, Kathleen	Dodd, Elizabeth	Dodd, Laura	Dodd, Tim	Dodds, Jeanne	Dodds, Paul
Doden, Marjean	Dodge, Donald	Dodge, Margaret	Dodge, Tross	Dodson, Carol	Dodson, Melissa
Doe, Jane	Doebel, Norman	Doebler, Rachel	Doering, David	Doernemann, Erin	Doerr, Tyler
Doesserich, Diane	Dogias, Laura	Doherty, Jeanne	Doherty, Jessica	Doherty, Joanne	Doherty, Peter
Doherty, Tyler	Doherty, Whitney	Dohmen, Ellen	Dohn, Michael	Dokes, Brandon	Dolan, Heather
Dolan, Mary	Dolan, Robert W.	Dolan, TM	Dolbow, Tracey	Dolecki, R	Dolinka, Toby
Dolive, Louis	Doll, Craig	Doll, Jr., Warren	Doll, Nancy	Doll, Robert	Dollak, Nicholas
Dollar, Gregory	Dollard, Nancy	Dollarton, Robert	Dolloff, Jacoba	Dolloff, Ross	Dolnooryahov, Dimitar
Dolotta, David	Dolphin, Jacqueline	Domal, Dave	Domb, Doreen	Dombroski, Edward	Dombrowski, Sandra
Dominc, Botjan	Domingue, Charles	Domingue, Christine	Dominguez, Leydis	Dominguez, Marisol	Dominick, Tim
Dominy, Brandy	Domke, Ellen	Domulevicz, Glen	Domurath, Mir	Donabed, Sargon	Donahoe, Lisbeth
Donahue, Linda	Donahue, Nona	Donahue, Patricia	Donahue, Sandra	Donahue, Sara	Donaldo, Hera
Donaldson, Jamie K.	Donaldson, John R	Donaldson, Patrick	Donatelli, Derek	Donath, Gail	Donati, Monica
Donato, Jasmine	Donavel, Mason	Donchik, Liliana	Donegan, Shahn	Dong, Kiku	Donitz, Claire
Donley, John	Donley, Laurie	Donn, Gloria	Donnell, Philip	Donnell, Sally	Donnelly, Bonny
Donnelly, Debbie	Donnelly, John F.	Donnelly, Lisa	Donnes, Charlie	D'onofrio, Adam	Donofrio, Mac
D'onofrio, Sue	Donohue, Colin	Donohue, Robert	Donohue, Taylor	Donoso, Steve	Donovan, Carolyn
Donovan, Charlene	Donovan, Diana	Donovan, Elaine	Donovan, Flora	Donovan, Heather	Donovan, Joan
Doocy, L	Doodan, Melissa	Dooley, Catherine	Dooley, Jeff	Doolittle, Deb	Door, Mondee
Doornbos, Don	Dopher, Avery	Doran, Allen	Doran, Joseph	Doran, Patricia	Dorchin, Susan
Dorcy, Daniel	Dore, Daisy	Dorer, Michael	Dorfman, Mary Virginia	Dorgan, Kathleen	Dormont, Mitchell
Dornano, Renee	Doroteo, Belen	Dorough Johnson, Elaine	Dorrell, Trudy	Dorsett, Holly	Dorsey, C
Dorsey, Jill	Dorsey, Kelly	Dorsey, R. Stephen	Dorsey, Thomas	Dorsten, Mark	Dorval, Melissa
Dos Santos, Jamie	Dosch, Mary	Dosch, Michelle	Doss, Harley	Dossena, Pier	Dosser, Amy
Dostalek, Patricia	Dotson, Mike	Dotter, Richard	Doty, Carol	Doty, David	Dotzauer, Uwe

Doubletweislak, Yvette	Doublin, Robert	Doucet, Lisha	Doucette, Gary	Dougan, David	Dougherty, Dennis
Dougherty, Eric	Dougherty, Frank	Dougherty, Linda	Dougherty, Lyle	Dougherty, Paul	Dougherty, Sarah
Dougherty, Susan	Douglas, Anne	Douglas, Anne	Douglas, Carpenter	Douglas, Dianne	Douglas, Donna
Douglas, Elizabeth	Douglas, Jayne	Douglas, Jeff	Douglas, Jon	Douglas, L	Douglas, Manetric
Douglas, Marceli	Douglas, Marion	Douglas, Mindi	Douglas, Shane	Douglas, Tammy	Douglass, Amy
Douglass, Barry	Doura, Joan	Douty, Lucy	Doval, Peter	Dove, Judith	Dow, Roxane
Dowdy, Dawn	Dowell, Caroline	Dowell, Dennis	Dowell, Jessica	Dowell, Stephanie	Dowling, Christopher
Dowling, Holly	Down, Arden	Downard, Wendy	Downey, Janelle	Downey, Judith	Downey, Meghan
Downey, Nick	Downey, Ronda	Downhower, Susan	Downie, Sandra	Downing, Charles	Downing, Deeann
Downing, James	Downing, Matthew	Downing, Rosamund	Downing, Steve	Downs, Kim	Downs, Mike
Downs, Robert	Downs, Thomas	Doyle, Barbara	Doyle, Garry	Doyle, James	Doyle, Janet
Doyle, Katherine	Doyle, Kathleen	Doyle, Kristina	Doyle, Marguerite	Doyle, Patrick	Doyle, Russ
Dozois, Holly	Drabinsky, Todd	Dragan, Sandra	Dragavon, David	Dragona, Danielle	Dragunoff, Cherylann
Drahan, Casimir	Drahos, Ronald	Drake, Carol	Drake, Darlene	Drake, Eric	Drake, Francis
Drake, Fred	Drake, Jay	Drake, Mercy	Drake, Michael	Drake, Peggy	Drake, Priscilla
Drake, Robert	Drake, Roberta	Drake, Shanna	Drake, Tracy	Drake, William	Draper, Akara
Draper, Barb	Draper, Barbara	Draper, Dyan	Draper, Mallory	Draper, Marc	Draper, Ryan
Draskovich, Joan	Dratch, Sam	Drautz, Georges	Draxler, Paul-mary	Draznin, Neal	Drecker, Barbara
Drees, Heather	Dreessen, Mark	Dreeszen, Carolyn	Dreier, Tamara	Dreisbachtowle, Barbara	Dremalas, Lyn
Drennan, Flora	Drenning, Vicki	Drentlaw, Leslie	Drepaul, Oscar	Dresbach, Katrina & William	Drescosky, Sharon
Dresens, Henriette	Dresner, Bianca	Dressel, Tim	Dresser, Connie	Dresser, David	Dressler, Rosemary
Drew, Craig	Drew, Debbie	Drew, Janet	Drews, Jane	Drexler, Wendy	Dreyer, Sharyn
Driesens, William	Driggers, Judy	Dring, Diana	Driscoll, Adam	Driscoll, Breana	Driscoll, Christie
Driscoll, Dan	Driscoll, Laura	Driskill, Anna	Driver, Daniel	Droege, Janet	Droll, Ann
Droll, Francesca	Droppers, Joanne	Drouin, Andre	Droz, Beverly	Druch, Jerry	Drucker, Susan
Druffel, Tatiana	Druke, Carmen	Drumm, Philip	Drummond, Bobby	Drummond, Paul	Drumright, Chris
Drwinga, Helen	Dryden, Danielle	Dryden, Marlie	Dryden, William	Dryer, Valerie	D'souza, Marisa
D'souza, Randoolph	Dsubner, Bunny	Dubasik, Valentina	Dubble, Dinah	Dubey, Bill	Dubinsky, Jesse
Dubois, Eleanor	Dubois, Jeanine	Dubois, Julia	Dubois, Sam	Dubois, Virginia	Dubose, Brittiany
Dubose, Scott	Dubovsky, Kristin	Dubrow, Rita	Dubuis, Guy	Ducey, Chris	Ducharme, Elena
Duckworth, Nadine	Duclaud, Monica	Ducosin, Patti	Dudan, Claire	Dudan, Don	Dudek, Jan
Duderstadt, Andre	Dudley, Julia	Dudley, Sam	Dudley, Walter	Dudley, William	Dudziec, George
Dufau, Pat	Duff, Mary	Duffee, Toni	Duffey, Brenda	Duffie, Jack	Duffy, Barbara
Duffy, Diana	Duffy, Mike	Duffy, Suzanne	Duffy, Wendy	Dufner, Angeline	Dufour, Christine
Dufour, Richard	Dufresne, Normand	Dugalin, Catherine	Dugan White, Dixie	Dugan, Dan	Dugan, Mary
Dugan, Pamela	Dugar, Alice	Dugaw, Anne	Duggan, Eric	Duggan, Peter	Duggins, Gail
Duke, Dani	Dulcic, Slavica	Duley, Caroline	Duley, Debbie	Duley, Richard	Dulfer, Steve
Dulitz-altman, Jeri	Dull, Marissa	Dulong, Gretchen	Duma, Christopher	Dumais, Jayne	Duman, Jo Ann
Dumas, Ethel	Dumas, Joan	Dumestre I, Cin	Dumke, S.	Dummerauf, Carla-maria	Dumont, Phil
Dumouchelle, Lucille	Dumpleton, Timothy	Dumser, N.	Dunawaybrown, Trudy	Dunbar, Miriam	Duncan, Ann
Duncan, Barbara	Duncan, Barbara	Duncan, Bryan	Duncan, Dean	Duncan, Gregory	Duncan, James
Duncan, Kim	Duncan, Renee	Dunfee, Shari	Dunham, Jack	Dunham, Janet	Dunham, Trudy
Dunkelberger, John	Dunkell, Dashiell	Dunkle, Yvonne	Dunlap Jr, Floyd	Dunlap, Amber	Dunlap, Irene
Dunlap, Lorraine	Dunlap, Nancy	Dunlap, Naomi	Dunlap, Susana	Dunlap, Thomas	Dunlap, Tracey
Dunlevy, Margaret	Dunlop, JO	Dunmire, Larry	Dunn, Alton	Dunn, Brian	Dunn, Charles And June
Dunn, Christy	Dunn, Diane	Dunn, Gary	Dunn, Georgette R	Dunn, Kathy	Dunn, Krista
Dunn, Kristi	Dunn, Lois	Dunn, Matthew	Dunn, Micah	Dunn, Morena	Dunn, Pat
Dunn, Patrick	Dunn, Racheal	Dunn, Susan	Dunn, Timothy	Dunnam, Thomas	Dunne, Lori
Dunne, Patricia	Dunnigan, Colin	Dunseith, Dee	Dunsmore, Stuart	Dunstan, Janice	Dunston, Lawrence
Duong, Kevin	Dupler, Rachel	Duplex, Janice	Dupont, Dianna	Duppstadt, Eileen	Dupre, Melanie
Dupree, Donna	Dupree, James	Dupuis, Joyce	Duquette, Jill	Dura, Michael	Durack, Jean
Duran, Alexander	Duran, Eve	Duran, Ginger	Duran, Jan	Duran, Janet	Duran, Matt
Duran, Ricardo	Durando, Mary	Durbin, Eric	Durbin, Jean	Durbin, John	Durbin, Steve

Durden, Charles	Durden, Lynda	Duree, Synthia	Duren, Sheri	Durfee, Donna	Durfey-lavoie, Emile
Durham, Desiree	Durham, Dewitt	Durham, James	Durham, Maggie	Durham, Martha	Durham, Rende
Durick, Andrea	Durkin, Joyce	Durkin, Paul	Durkin, Samuel	Durkin, Susan	Durnell, Susan
Durnell, Tim	Duroche, Lucy	Durrum, Kathy	Dusek, Russ	Dushek, Karen	Dushel, Kate
Dusk, Amber	Duske, Tamo	Dusman, Susan	Dusseault, Renata	Duster, George	Dustrud, Faith
Dutra, Marleen	Dutra, Ron	Dutschke, Stephen	Duttaroy, Pranab	Dutton, Michael	Duval, Gene
Duval, Margaret	Duvall, Leeann	Duvall, Mary	Duverger, Roy	Duvert, Elizabeth	Dvm, Dr Bud Stuart
Dvoracek, Dwayne	Dvorak, Bill	Dvorak, Vojin	Dvorscak, ED	Dwight, Christine	Dwillis, Alan
Dworin, Ilana	Dwyer, Edward	Dwyer, Gail	Dwyer, Virginia	Dyck, J.I.	Dycus, Terry
Dye, ED	Dye, Fabienne	Dye, N	Dyer, Brad	Dyer, Deborah	Dyer, Douglas
Dyer, Ginger	Dyer, Heather	Dyer, Jym	Dyer, Luwana	Dyer, Paul	Dyke, Sandy
Dykhuis, Roger	Dykoski, Dr. William 'skip'	Dyksman, Leo	Dykstra, Andrea	Dykstra, Cheryl	Dykstra, Richard
Dymeck, Dennis	Dymeck, Terri	Dymond, Cheryl	Dynan, Denise	Dysart, Gretchen	Dysart, Tonya
Dysinger, Guy	Dziedzic, Jennifer	Dziegrenuk, Catherine	Dzikowski, David	Dzioba, Martha	Dzubak, Cheryl
Dzwil, Beth	E, Kirsten	E, S	E., Valerie Joy	Eaddy, James	Eadie, Sally
Eadie, William	Eagan, Yvonne	Eames, Cheryl	Eardley, Christine	Earl, Amy	Earl, John
Earl, Susan	Earle, Susan	Earles, Brent	Earls, Hope	Earnshaw, Joan	Earnshaw, Joan
Earp, Teresa	Easley, David	Eason, Rita	East, Lawrence	Eastabrooks, Ann	Easterby, Leslie
Easterly, Sharon	Eastes, Mary	Eastman, Ajax	Eastman, Daniel	Eastman, Nicole	Eastman, Sylvia
Eastridge, Susann	Eastway, Eugene	Eastwood, Pam	Eaton, David	Eaton, Laura	Eaton, Lauren
Eaton, Pam	Eaton, Paula	Eaton, Sandy	Eaton, Sharon	Eaton, Terry	Eaves, Kelly
Ebeling, Sally	Eben, Barry	Eberhardt, Carrie	Eberhardt, Thomas	Eberle, Anne	Eberle, Don And Ann
Eberle, Kat	Eberle, Mel	Eberline, Curtis	Eberling, David	Ebersole, Sean	Ebert, Regan
Ebey, Melinda	Ebner, Carole	Ebner, Maureen	Ebner, Michael	Ebright, Jeffrey	Eby, James
Eck, Christopher	Eckardt, Gerhard	Eckart, Charles	Eckberg, Brenda	Eckenroth, Chris	Ecker, Christopher
Eckerline, Mckenna	Eckert, Margaret	Eckler, John	Ecklund, John	Eckman, James	Eckman, Mark
Eckmann, Rob	Eckstein, Curtis	Eckstrand, Tatyana	Economides, Cristina	Economos, Jessica	Economou, Constantina
Edain, Marianne	Eddinger, Donald	Eddy, Paul	Edel, Debbie	Edelen, Jennifer	Edell, Jeffrey
Edelman, Eric	Edelman, Richard	Edelstein, Barbara	Eden, Jonathan	Edens, Leah	Edens, Teresa
Edgar, Willa	Edge, Rhea	Edgerton, Muriel	Edgerton, Trish	Edgren, Mark	Edick, T
Eding, Megan	Edman, John	Edmed, Bianca	Edmond, Tina	Edmonds, Matthew	Edmonds, Teresa
Edmondson, Jackie	Edmondson, Nancy	Edmondson, Rick	Edmonson, Nancy	Edmonston, Pandora	Edmunds, Sarah
Edney, Cynthia	Edquist, Ian	Edsall, Jane	Edson, Patricia	Edstene, Kay	Edwards, Amber
Edwards, Barbara	Edwards, Bita	Edwards, Charlotte	Edwards, Dawn	Edwards, Denise	Edwards, Denise
Edwards, Elizabeth Carol	Edwards, Eric	Edwards, Esteban	Edwards, Jacqueline	Edwards, Joe	Edwards, Joy
Edwards, Karen	Edwards, Lance	Edwards, Laura	Edwards, Martha	Edwards, Mary	Edwards, Mary
Edwards, Monique	Edwards, Nancy	Edwards, Nicole	Edwards, Nora	Edwards, Peggy	Edwards, Robert
Edwards, Susie	Edwin, Monroe	Eells, Eve Marie	Eells, Margaret	Effinger, Jason	Efron, Deborah
Egan, Brenda	Egan, Catherine	Egan, Gioconda	Egan, Marilyn	Egan, Susie	Egbert, Anne
Ege, Lois	Egger, Patricia	Eggers, Elke	Eggleton, Peter	Eggum, Bruce	Egnal, Martin
Egner, Amber	Egtvedt, Claire And Hilkka	Ehat, Rosemary	Ehlen, Virginia	Ehlers, Lindsey	Ehm, Mary
Ehman, Lee	Ehmann, Anne	Ehnes, Tiffany	Ehren, Jennifer	Ehrenberg, Daniel	Ehresmann, Donna
Ehrhardt, Erin	Ehrlich, Barbara	Ehrlich, Marion	Ehrman, Gordon	Ehrnst, Amanda	Eichacker, Cindy Sue
Eichelberger, Carrie	Eichenbaum, Ingrid	Eichhorn, Rogerlyn	Eichman, James	Eichorst, Rebecca	Eick, Matthew
Eielson, Olivia	Eiger, Cheryl	Eikeland, Karen	Eiland, Doris	Eilbracht, Ellen	Eilenberg, Alisa
Eilloams, Pam	Einfalt, Janet	Eischen, Robert	Eise, Martha	Eisemann, Cathy	Eisen, Julia
Eisen, Noam	Eisenbach, Sam	Eisenberg, Andrea	Eisenberg, Christi	Eisenberg, Ethan	Eisenberg, Michael
Eisenberg, Paul	Eisenberg, Sarah	Eisenhardt, Gay	Eisenhauer, Brenda	Eisenhuth, Gary	Eisenstadt, Karen
Eisentrager, Evan	Eisman, Gregg	Eisman, Mary	Eismueller, Pamela	Eisterhargrave, Leah	Ekaitis, Eugene
Eki, Linda	Eklund, Laura	Eklund, Steve	El Masri, Judy	El-ahdab, W.	Elamma, Christy
Elan, Stiftungsnetzwe	Eland, Lynn	Elaouar, Nada	Elbling, Sarah	El-dehaibi, Fayten	Elder, Fonda
Elder, Olivia	Eldridge, James	Eldridge, Lisa	Eldridge, Robyn	Elepano, Amy	Elfenbein, Arynne
Elgren, Cindy	Elia, Rn, Cynthia	Elia, Rob	Elias, Johanna	Elias, Ralph	Eliasberg, Judith
Eliason, Sharon	Eliasov, Ruth	Elicerio, Audrey	Eliopoulos, Jacqueline	Eliscu, Peter	Elison, Jeffrey

Elizer, Elvie	Elkins, E	Elkins, Judy	Elkins, Lori	Elkins, Michael	Elle, Ana
Elledge, Heather	Eller, Dennis	Eller, K	Eller, Rebecca	Ellestad, Nancy	Elling, Ray
Ellingwood, Mary	Elliott, ED	Elliott, Emily	Elliott, Jean	Elliott, Len	Elliott, Lydia
Elliott, Lynn	Elliott, Mary	Elliott, Nicki	Elliott, Patricia	Elliott, Shawn	Elliott, Virginia
Elliott-holmes, Ann	Ellis Bond, Charlene	Ellis, Annne	Ellis, Arienne	Ellis, Debbie	Ellis, Dr. Miriam
Ellis, Graham	Ellis, Jamie	Ellis, Kathryn	Ellis, Koll	Ellis, Lois	Ellis, Mary-frances
Ellis, Paul	Ellis, Roger	Ellis, Sheila	Ellison, Tracy	Ellis-vickers, Camille	Ellmaker, Barbara
Ellsworth, Heather	Ellsworth, Wendy	Ellus, Barbara	Elman, Mark	Elmendorf, David	Elmore, Dave
Elmore, Ronald	Elms, Elfie	Elms, Heather	Elms, Tracy	Elsayed, Christina	Elsee, Allison
Elsenhans, Linda	Elsner, Daniel	Elstad, Janette	Elster, Evelyn	Elston, Mary	Elston, Paula
Eltgroth, Nicholas	Elverston, Catherine	Elvira, Concepcion	Elwell, Herbert	Emanuel, Frances	Emanuel, Linda
Emanuel, Patricia	Embler, Larry	Embree, Angela	Embrey, Elaine	Embrey, Glenn	Embrey, Samantha
Emerson, Anne	Emerson, C	Emerson, Carole	Emerson, Greg	Emerson, Jan	Emerson, Judith
Emerson, Larry	Emerson, Lauran	Emery, John	Emery, Rosanne	Emery, Susan	Emin, Deborah
Emley, Larry	Emme, Linda	Emmons, Ian	Emmons, Jamie	Emmons, Mary	Emmott, Tom
Emrich, Richard	Emrick, Jane	Emshoff, Arthur	Encinas, Christina	Encinas, Steven	Endicott, Kimberly
Endress, Daphne	Enevoldsen, David	Eng, ED	Engdahl, Anna	Engel, Arden	Engel, Carolyn
Engel, Eric	Engel, Linda	Engel, Marc	Engel, Nettie	Engel, Sabrina	Engelbrecht, Barbara
Engels, Linda	Engeran, Nicole	Engert, Kathy	Engineer, Yasmin	England, C. Brent	England, Courtney
England, Roland	Engle, Constance	Engle, I.	Engler, Edward	English, Dale	English, Jade
English, Shirley	English, Terri	Englund, Doug	Englund, Klaudia	Engram Francis, Cheryl	Engstrom, Mary
Ennis, Richard	Ennouri, Elena	Enriquez, Karyme	Enser, Mark	Enser, Suzanne	Ensor, Sandra
Enstrom, Paula	Enyeart, Rose	Enz, Francie	Ep, Laura	Epis, Tiziana	Episcopo, Jeannette
Epley, Cherie	Epley, Walter	Epp, Hollie	Epp, Theresa	Eppinger, Lois	Epstein, Emily
Epstein, Hedy	Epstein, Judy	Epstein, Kelly	Epstein, Ken	Epstein, Luanne	Epstein, Nick
Erb, Cheryl	Erbs, Lori	Erceg, George	Erckmann, Jim	Erckmann, Lynn	Erdman, Tatiana
Erhard, Bryan	Erhorn, Walter	Erice, Nilo	Ericksen, Allen	Ericksen, Bri	Erickson Commerce, Joann
Erickson, Andrea	Erickson, Bob	Erickson, Charles	Erickson, David	Erickson, Elaine	Erickson, Jackie
Erickson, Jon	Erickson, Kathleen	Erickson, Kathleen	Erickson, Leland	Erickson, Lois	Erickson, Lynda
Erickson, M.d., Frank	Erickson, Mary	Erickson, Meredith	Erickson, Penny	Erickson, Peter	Erickson, Rebecca
Erickson, Rob	Erickson, Walter	Eriksen, Melissa	Erikson, Anne	Erikson, David	Erikson, Kelly
Eriksson, Peter	Erlander, Daniel And Karen	Erling, Jeanne	Erman, Kristin	Ernst, Cathie	Ernst, Marlene
Errichetti, Dara	Errington, Chris	Erschen, Katie	Ersik, John	Erthal, Maureen	Ertl, Jeanine
Ervick, Kristen	Ervin, Cecile	Ervin, Donald	Erwin, Jeffrey	Erwin, Jeffrey	Erwin, Phyllis
Erwin, Thomas	Erz, Ron	Escajeda, Mark	Escalona, Arika	Esch, Dean	Eschen, John
Escobales, Lauren	Escobar, Victor	Escobedo, Beatriz	Esden- tempski, Danika	Eskandari, Carole	Eskenazi, Lynn
Eskenazi, Pat	Esler, Izzy	Espasandind, David	Espe, Greg	Espinosa, Claudia	Espinosa, Olga
Espinoza, Bernadette	Espinoza, Debra	Espinoza, Michael	Espinoza, Noel	Espinoza, Yaraly	Esposito, Brittany
Esposito, Eric	Esposito, Phillip	Esposito, Phillip	Esposito, Steven	Esposito, Susan	Esquivel, Eric
Esquivelobregun, Regina	Esser, Nicholas	Essig, Grae	Essington, Stefanni	Essman, John	Esson, Genevieve
Estacion, Carlene	Estay, William	Estep, Danny	Estep, Donald	Estergomy, Beth	Esterkin, Robin
Esterman, Karyn	Estes, Alyssa	Estes, Carl	Estes, Douglas	Estes, Elizabeth	Estes, John
Estes, Martha	Estes, Rena	Estes, Rose	Estes, Susan	Esteve, Gregory	Estrada, Maria
Estrin, Andres	Estudillo, Adela	Esuruoso, Oluremi	Etapa, Christine	Etchart, Graciela	Etchison, Janice
Etchison, Laura	Etemad, Marguerite	Etgen, Benjamin	Etges, William	Etheridge, Donna	Etherington, Mary
Etherton, Mary	Etherton, S.	Etter, Eleanor	Ettinghausen, Ph.d., Elizabeth S.	Eubank, Angie	Eubanks, Arlene
Eubanks, Jennifer	Eubanks, Mary	Eudy, Elaine	Eugenis, Christy	Eurich, Quinn	Eurquhart, Raymond
Eustice, Donna	Eustis, Linda	Evan, V	Evans, Andrew	Evans, Brenda	Evans, Carol
Evans, Chad	Evans, D	Evans, D.N.	Evans, Daniel	Evans, Elizabeth	Evans, Evelyn
Evans, Gail	Evans, Hersha	Evans, Jeffrey & Susan	Evans, Judith	Evans, Keisha	Evans, Keith
Evans, Margaret	Evans, Marie	Evans, Max	Evans, Mr.	Evans, Pam	Evans, Ric
Evans, Robert	Evans, Rosemary	Evans, Sara	Evans, Sharon	Evans, Sheldon	Evans, Staci
Evans, Staci	Evans, Steve	Evans-ford, Sharon	Eve, Tracy	Evenson, Marilyn	Everett, Billy Don

Everett, Greg	Everett, John	Everett, Kevin	Everett, Kristina	Everett, Tamara	Everhart, Scot
Everitt, Tory	Everly, Patricia	Evers, Marcia	Everson, Madria	Everts, Connie	Evilsizer, Susan
Evinczik, Eric	Evinger, Linda	Evitt, Kinney	Evon, Debra	Evon, Michael	Ewald, Gary And Judy
Ewaldt, Sandra	Ewer, Susan	Ewers, Bronwyn	Ewing, Lucinda	Ewing, Suzanne	Ewoldsen, Brooke
Ewoldt, Dave	Excoffier, Celine	Exner, Joan	Eyet, Bobbie	Eynon, Paige	Eyster, Steve
Eythrib, Myriam	Ezell, Teressa Rose	F, Annette	F, Wendy	F., Amy	F., Angie
F., Dee	F., Jennifer	F., T.	Faatz, Susan	Faber, Megan	Fabian, Milo
Fabiane, Karen	Fabo, Concetta	Fabrico, Stephen	Faccioli, Elena Maria	Face, Valerie	Facella, Mario
Facey, Carol	Facey, Laurel	Fachko, D.	Fackenthall, Steven	Faeo, Victoria	Faes, Stephen
Fager, Leon	Fago, John	Faherty, Mara	Fahey, Lara	Fahlgren, Joan	Fahlman, Cheryl
Fahmy, Natalie	Fahrendorff, Sandra	Fahrenwald, Gill	Fahrenwald, Paprika	Fahrer, Barry	Fahrner, Colette
Fahrner, Rita	Faia, Don	Faich, Ron	Faille, Carolyn	Fain, Laura	Fairbank, Owen
Fairbanks, Diana	Fairchild, Stephanie	Fairchildehm, Audrey	Faircloth, Diane	Faircrest, Cattrione	Faires, April And Joseph
Fairfield, Richard	Fairless, Caroline	Fairless, Richard	Fairly, Judith	Fairman, Marcia	Fait, Martha
Faith, Bonnie	Falacara, Linda	Falaguerra, Victoria	Falasca, Dawn	Falck-madsen, Judith	Falcon, Rabbi Ted
Falcone, Janet	Faledas, Julian	Falk, Jennifer	Falk, Sarbaga	Falken, Dr. Geffin	Falkenstein, Joan
Falkin, Monica	Falkner, Roberta	Fall, Fred	Fallandy, Yvette	Faller, Kathleen	Fallis, Jane
Fallon, Jean	Fallon, John	Fallon, Patricia	Falls, Richard	Falsetti, Catyana	Falvey, Tom
Falzone, Richard	Fama, Lorraine	Fanaraberrian, Nancy	Fanelli, Noemi	Fangman, Leslie	Fankhauser, Barbara
Fannin, Jo Anne	Fant, Diane	Fant, Suzan	Fantonisalvador, Dr. Patricia	Farabaugh, Clare	Faraklas, Judy
Faraldo, Adriana	Farber, Alice	Farber, Steven	Farenkopf, Nathan	Faris, Cheryl	Farkas, Elizabeth
Farkas, Paul	Farley, Chanda	Farley, ED	Farley, Elizabeth	Farmer, Elizabeth	Farmer, Marinda
Farney, Keitha	Farnham, Pam	Farnolo, Theresa	Farnsworth, Adrian	Faro, Gina	Farquhar, Susan
Farr, Cary	Farrand, Lydia	Farrant, Roy	Farrell, Amy	Farrell, Bob	Farrell, Catherine
Farrell, Courtney	Farrell, Ellen	Farrell, Jason	Farrell, Kate	Farrell, Keely	Farrell, Margaret
Farrell, Nancy	Farrell, Tom	Farrell, Valerie	Farrell, Wendy	Farrington, David	Farris, Cathy
Farris, Peter	Farrow, Brian	Farthing, Steve	Farver, Mike	Farwell, Geralyn	Fary, James
Fasanella, Camille	Fasanella, Donna	Fasano, Grace	Faschinggray, Benjamin	Faser, Lisa	Fass, Amy
Fass, Arline	Fass-holmes, Barry	Fassler, Cary	Fassman, Dennis	Fast, David	Fast, Katy
Fast, Linda	Fast, William K	Fastuca, Joy	Fastuca, Meagan	Faubel, Sterling	Faucett, Carol
Faucette, Stephanie	Fauci, Joanne	Fauconnier, Jean-francois	Faudie, Fred	Faulhaber, Linda	Faulk, Don And Joyce
Faulkenberry, Stephanie	Faulkner, Don & Mary	Faulkner, Jennifer	Faulkner, Lacey	Faure, Louis	Fauskee, Justin
Faust, Jeanne	Faust, Marjorie	Favela, Amtrica	Favero, Vanessa	Fawcett, Ann	Fawcett, Sarah
Faxon, Russell	Fay, P	Fay, Robert	Fay, Susan	Fayzullina, Guliya	Fazio, Margie
Fdogjdf, Bonr	Feagin, Evette	Fears, Wendy	Feather, Wendy	Feathers, Josan	Federman, Joan
Federowicz, Darlene	Fee, Dara	Feeley, Laura	Feeley, Marie	Feen, Hildy	Feenaughty, David
Fegan, Michael	Fehr, Richard	Fehr, Stephen	Fehring, Jeff	Feichtinger, Dennis	Feig, Andrea
Feild, Barbara	Feild, Ryan	Feinerman, Lynn	Feingold, Susan	Feinhaus, Isaac	Feirtag, Donna
Feissel, John	Feissel, Sharon	Feist, Frank	Fejes, Suzanne	Felber, Michael	Felcan, Pat
Feldberg, Sharon	Feldman, Joanne	Feldman, Justin And Ann	Feldman, Marian	Feldman, Mark	Feldman, Maurica
Feldman, Tracy	Feldmann, Heike	Feldmann, John	Feldmansaylor, Nancy	Felegy, Timothy	Feliciano, Eugene
Felix, Alice	Felix, Lindy	Felix, Robert	Felker, Julia	Fell, Joseph	Fellenz, Jan
Feller, Karl	Fellner, Robin	Fellows, Paul R	Felltham, Bette	Felmet, Michael	Felsen, Sara
Feltham, Wendy	Felts, Karen D.	Felts, Rita	Femmer, John	Fendall, Rachel	Fender, Carole
Fenenbock, Lauren	Fener, Robert	Fenick, Amanda	Fenley, Bette-burr	Fenske, Tammy	Fenster, Steven
Fensterer, William	Fenstermacher, Laurie	Fenton, Inge	Fenton, Sandra	Fenza, Karen	Feokhari, Anton
Ferb, Kelly	Ferber, L	Ferendo, Cheryl	Ferentz, Mary Ann	Fergeson, Cheryl	Fergot, Michael
Fergus, Jeri	Fergus, Joan	Ferguson, Dave	Ferguson, Donna	Ferguson, Donna	Ferguson, Erin
Ferguson, J	Ferguson, James	Ferguson, Jan	Ferguson, Marcia	Ferguson, Melissa	Ferguson, Mike
Ferguson, Neil	Ferguson, Pamela	Ferguson, Tasha	Ferguson, Vicki	Ferguson, Voncile	Ferguson, Yolanda
Ferko, Erica	Ferland, Linda	Fernald, Annie	Fernald, Kirk	Fernanda, Maria	Fernandes, Ana-paula
Fernandez, Daniela	Fernandez, Gisela	Fernandez, Jeffrey	Fernandez, Jose Luis	Fernandez, Kathleen	Fernandez, Magaly

Fernandez, Pablo	Fernandez, Ramon	Fernandez, Ynez	Fernandez, Yvette	Fernandez-willis, Mercedes	Fernhill, Bill
Ferra, Judith	Ferrando, Caroline	Ferrante, Joan	Ferrante, Leslie	Ferranti, Elizabeth M	Ferrara, Angelo
Ferrara, Loraine	Ferrari, Andrea	Ferrari, Angela	Ferraro, Frank	Ferraro, Mary	Ferraz, Yasha Luiz
Ferreira, Manuel	Ferrell, Judith	Ferrell, Phillip	Ferrer, Leonardo	Ferretti, Chris	Ferrici, Mark
Ferrier, Daniel	Ferriera, Gail	Ferrigno, Mary	Ferrill, Clayton	Ferrin, Mick	Ferrobialog, Ann Marie
Ferron, Mark	Ferrucci, Albert	Ferry, Daniel	Fertig, Carol	Fesler, Sarah	Fetrow, Chad
Fetter, Sharon	Fetting, Joanne	Feuer, Kate	Feuer, Matt	Feuerborn, Laura	Few, Tamara
Fewster, Daniel	Fexis, Deborah	Feyne, Stephanie	Feywine, A	Fiad, George	Fiandaca, Anastasia
Fiasca, Anna	Fidaleo, Kathleen	Fiebernitz, Mitchell	Fiedler, Daniel	Fiedler, David	Fiedler, ED
Fiedor, Jillian	Fiegel, Esther	Fiehrer, Paulette	Field, Camilla	Field, Jaimie	Field, Les
Field, Mitchell	Field, Rachel	Field, Siobhan	Fielden, Jessica	Fielder, Linda	Fields, John
Fields, Kirstin	Fields, Vanessa	Fieni, Mary	Fiering, Wendy	Fiero, Marion L.	Fifer, Nancy
Fifield, Wilbert	Fighera, Linda	Figtree, Craig & Sam	Figueroa, Daphne	Figueroa, Maria	Figueroa, Victor
Fike, Branden	Fikuart, J Richard	Filatov, Sergey	Files, Edward	Filice-smith, Noelle	Filio, Michael Lynn
Filip, Mike	Filipelli, Phd, Deborah	Filipkowski, Alyssa	Filippin, Rachel	Fill, Theodore	Finamore, Scott
Finan, Joe	Finateri, Mario	Finazzo, John	Finch, Bonnie	Finch, Glenn	Finch, Jean
Finch, Suzann	Fincher, Jill	Findeiss, Patricia	Findler, Barbara	Findley, Gail	Findley, Helen
Findley, Nadia	Fine, Cindy	Fine, Lena	Fine, Michael	Fineman, Alexis	Fineran, Mary
Fingar, David	Fingerman, Robert	Fink, Brian	Fink, Jodie	Fink, Mariah	Fink, Patti
Fink, William	Finkbeiner, Wesley	Finke, David	Finke, Maryann	Finkel, Ursula	Finkelstein, Lauren
Finkelstein, Linda	Finlay, Evan	Finlay, James	Finlayson, Louise	Finley, Andrea	Finley, Joel
Finlley, Patricia	Finlon, Maureen	Finn, Gitta	Finn, Judith	Finn, Kevin	Finnegan, Pamela
Finochio, Frank	Finodeyev, Oleg	Finwall, Maggie	Finzer, Chris	Fiodorow, Sabrina	Fiore, Mark J.
Fiore, Melody	Fiore, Roseann	Fiore, Tibo	Firchow, Eric	Firely, Monica	Firestone, Douglas
Firestone, Lynne	Firestone, Natalie	Fisch, Gabriel	Fischer, Carole Ann & Dieter	Fischer, David	Fischer, Deborra
Fischer, Geoffrey	Fischer, Gloria	Fischer, Kristin	Fischer, Mark	Fischer, Michael	Fischer, Norm
Fischer, Patrick	Fischer, Phil And Lynn	Fischer, Quentin	Fischer, Suzanne	Fischer, Tuula	Fischer, Wendy/dan
Fischetti, Bianca	Fischl, Maureen	Fischler, Krista	Fischmann, Stephen	Fischoff, Robert	Fish, David
Fish, Debbie	Fish, Jason	Fish, Margaret	Fish, Richard	Fishburn, Charles	Fisher Cumberland, Darrell
Fisher, Andrew	Fisher, Austin	Fisher, C	Fisher, Chuck	Fisher, David	Fisher, Elizabeth
Fisher, Gayle	Fisher, Helen	Fisher, Jack	Fisher, Jini	Fisher, JT	Fisher, Julie
Fisher, Karen	Fisher, Karen Karen	Fisher, Lana	Fisher, Larry	Fisher, Maxine	Fisher, Meaghann
Fisher, Michael	Fisher, Mike	Fisher, Myrna	Fisher, Penelope	Fisher, Renee	Fisher, Ronald
Fisher, Sally	Fisher, Sharon	Fisher, Stewart	Fisher, Tim	Fishman, Ted	Fishwick, Martha
Fisk, Todd	Fisk, William	Fisler, Mill	Fissinger, Julie	Fissinger, William	Fister, Lee
Fitch, James H.	Fitch, Kaitlin	Fite, Gregory	Fithian, Marylee	Fitterer, Lyn	Fittipaldi, Silvio
Fitton, Emily	Fitz, Fran	Fitze, Charles	Fitzgerald Azarnoff, Kathleen	Fitzgerald M.a., Bob	Fitzgerald, Allie
Fitzgerald, Bridget	Fitzgerald, Cathy	Fitzgerald, Deborah	Fitzgerald, Gerry	Fitzgerald, Glennis	Fitzgerald, Janice
Fitzgerald, John	Fitzgerald, Karen	Fitzgerald, Kevin	Fitzgerald, M.d., Shari	Fitzgerald, Michael	Fitzgerald, Stan
Fitzgibbon-appel, Genevieve	Fitzpatrick, Carole	Fitzpatrick, David	Fitzpatrick, Erik	Fitzpatrick, Lief	Fitzpatrick, Paul
Fitzpatrick, Tom	Fitzpatrick, Toni	Fitzsimmons, Amanda	Fitzwater, Kathryn	Fix, John	Fizdale, Georgia
Flack, Doug	Fladager, Susan	Flaherty, Molly	Flake-bunz, Colette	Flanagan, Daniel	Flanagan, John
Flanagan, Lynn	Flanagan, Marianne	Flanders, Kelly	Flanery, Theresa	Flannelly, Mary	Flannery, Marcia
Flannery, Mary	Flannery, Matthew	Flashman, Irwin	Flashner, Caren	Flater, John	Flatmo, Carol
Flax, Ron	Fleck, Robert	Fleetwood, Patricia	Fleischer, Tim	Fleisher, Marc	Fleishman, Ellen
Fleishon, Hadassah	Fleming, Barbara	Fleming, Christopher	Fleming, Colleen	Fleming, Jennifer	Fleming, Jim
Fleming, John And Jean	Fleming, Lauren	Fleming, SF	Fleming, Tami	Fleming, Ted	Fleming, Tracey
Fleming, William	Fletcher, Brooke	Fletcher, Carol	Fletcher, Charles	Fletcher, Janet	Fletcher, Jeanne
Fletcher, Karen	Fletcher, Rick	Fletcher, Todd	Fletcher, Tracey	Flick, Cynthia	Flick, Simeon
Flieder, Dee	Fliegel, Emily	Fligg, Katherine	Flinkstrom, Janet	Flint, Ben	Flint, Irene
Flint, Juliana	Flint, Leon	Flock, Margaret	Floeck, Monica	Floersch, Elizabeth	Flom, Walter
Flood Taylor, Diane	Flood, Janice	Flores Ehrlich, Ruth	Flores, Andrea	Flores, Anthony	Flores, Geffry

Flores, Glenda	Flores, Jeanne	Flores, Linda	Flores, Marilyn	Flores, Patty	Flores, Rafael
Flores, Rent	Flores, Shannon	Florian, Heather	Florin, David	Florin, Frank	Florio, Dawn
Florken, George	Flornoy, Roxanne	Flory, Rick	Flowers, Bobbie	Flowers, Curtis	Flowers, Howard
Flowers, Terree	Flowers, Terry	Floyd, Debra	Floyd, Eugene	Flum, Char	Flum, Sarah
Flyer, Susan	Flynn, Linda	Flynn, Patrick	Flynn, Robert	Flynn, Sharon	Fobes, Deborah
Fodge, Kathy	Fogarty, Dan	Fogarty, Gerry	Fogg, I	Fogg, Rick	Fogleman, Anne
Foglesong, Liz	Fogt, Judy	Fokstuen, Ingrid	Foland, Lisa	Folden, Marilyn	Foley Jr, Robert
Foley, Ann	Foley, Catherine	Foley, Conrad	Foley, Mary	Foley, Roseann	Foley, Steve
Folger, Enid	Folger, Jessica	Folit, Cynthia	Folkerson, Kelbi	Folks, Eric	Follan, Veronica
Follis, Robert	Followill, Peter	Follweiler, Anne	Fols, Stephen	Folse, Kim	Folts, Justin
Folts, Kimberly	Folts, Martha	Foltz, Mary	Foltz, Nora	Fonda, Tom	Fones, Tom
Fong, Christina	Fong, Joseph	Fonk, Jolene	Fonken, Miryam	Fonseca, Shiloh	Fonshill, Don
Fontaine, Cassidy	Fontaine, Yvette	Fontana, Ann	Fontana, Marie	Fontana, Mike	Foos, Paul
Foot, Susie	Foran, Rochelle	Forbes, Bill	Forbes, David	Forbes, J. Dana	Forbes, Reese
Forbes, William	Forcier, Dawn	Ford And Marks, Michael C. And Dr. Richard B.	Ford, Amber	Ford, Bob	Ford, Breann
Ford, Bronwyn	Ford, Carol	Ford, Dani	Ford, Emily	Ford, James	Ford, Jay
Ford, Kortni	Ford, Matthew	Ford, Nancy	Ford, Ph.d, Dr. Anthony	Ford, Steve	Ford, Susan
Ford, Terry	Ford, Wendy	Fordham, Malcolm	Ford-kohne, Gregory	Fore, Judy	Foreacres, Brian
Foreman, Lynn	Foreman, Mike	Foreman, Randall	Foreman, Richard	Forencich, Frank	Forero, James
Forest, Agatha	Forester, Georgna	Forester, Mark	Foret, Gloria	Forgacs, Nora	Forlie, Kai
Forman, Fay	Forman, Janet	Forman, Steven	Forney, Kathy	Forney, Susan	Forrest, Corinne
Forrest, Elizabeth	Forrest, Larry	Forrester, Mark	Forsberg, Theodore	Forsblom, Deborah	Forslund, Charles
Forster, Johannes	Forster, Michael	Forsyth, Thomas	Forsythe, Kathy	Fort, Denise	Fortier, Craig
Fortin, Jennifer	Fortini, Jan	Fortmueller, Beth	Fortner, Donna	Fortney, Char	Fortunato, Phyllis
Forwand, Arlene	Foschi, Patricia	Foss Jr., Gerald	Foss, Maryann	Fossard, James	Fost, Rebecca
Foster, Beverly	Foster, Dawn	Foster, Delaina	Foster, Dianne	Foster, Gina	Foster, Gregory
Foster, Halima	Foster, Jackie	Foster, Jacqui	Foster, Jason	Foster, Jessica	Foster, Joyce
Foster, Kay	Foster, Kay And Adon	Foster, Lannette	Foster, Leah	Foster, Marguerite	Foster, Marlene
Foster, Melissa	Foster, Patricia	Foster, Patricia	Foster, Paul	Foster, Pearl	Foster, Sam
Foster, Shauna	Foster, Sheila	Foster, Stephanie	Foster, Steven	Foster, Thomas	Foster, William
Foster, Winnie	Fothergill, Ann	Foty, Luann	Foucault, Victor	Fouche, David	Foulk, Docia
Fourcaud, Philippe	Foures-aalbu, Denise	Fournier, Eric	Fowler, Beverly	Fowler, Beverly	Fowler, Catherine
Fowler, Gyla	Fowler, Halle	Fowler, Ian	Fowler, Kirk	Fowler, Linda	Fowler, Londa
Fowler, Mary	Fowler, Paulette	Fowler, Russell	Fowler, Tammy	Fowler, Toby	Fowlerkobylewski, Lisa
Fowlie, Nancy	Fowlkes, Richard	Fox Davis, Lorain	Fox, Carol	Fox, Charles	Fox, Cindy
Fox, Cinnamon	Fox, Ellen	Fox, Gene	Fox, Heather	Fox, Jan	Fox, Janie
Fox, John	Fox, Kenneth & Lisa	Fox, Larry L	Fox, Lynda	Fox, Madison	Fox, Martha
Fox, Noah	Fox, Sandra	Fox, Sheila	Fox, Stephanie C.	Fox, William	Foxfriedman, Jeanne
Foy, Marilyn	Fpynn, Doug	Fraad-wolff, Tess	Fradkin, Allison	Fragetta, William	Fraley, Diana
Fraley, JT	Franca, Kaylan	France, Tom	Frances, Barbara	Franceschini, Lucinda	Franceschini, Mary
Franchi, Irena	Franciosi, Bonnie	Francis, Karen	Francis, Stuart	Francis, Toni	Francisco, Linda
Franck, Matthew	Francke, Allan	Franco, Diana	Franco, Ruben	Frandeen, Kathy	Frandson, Karla
Frank, Andrea	Frank, Cheryl	Frank, Christine	Frank, Cynthia	Frank, Dave	Frank, Edith
Frank, Elexis	Frank, Gregory	Frank, Heather	Frank, Marie-therese	Frank, Mitzi	Frank, Norman
Frank, Robert	Frank, Robert	Frank, Tena	Franke, John	Frankel, Arnold	Frankel, Leroy
Franken, Richard	Frankenfield, Pat	Franklin, Audrey	Franklin, Benita	Franklin, Courtney	Franklin, Doug
Franklin, Margaret	Franklin, Mary	Franklin, Mike	Franklin, Nick	Franklin, S.P.	Franks, Bill
Franks, Maggie	Franks, Robert	Franks, Ruth	Fransioli, Lena	Franson, Dhjana	Frantz, Brandi
Frantz, Glenn	Frantz, Rob	Franulic, Sean	Franz, J.	Franz, Mary	Franz, Sonja
Franzen May, Julie	Franzese, Jill	Franzese, Vincent	Franzmann, Peter & Sally	Frascinella, Gail	Fraser, Beth
Fraser, Cindy	Fraser, Joseph	Fraser, Suzy	Frasier, Bethany	Frate, Dom	Fravel, Mary
Frayer, William	Frazier, Dianne	Frazier, Eileen	Frazier, Julie	Frazier, Lana	Frazier, Libby
Frazier, Maggie	Frazier, Martin	Frazier, Shelley	Frazin, Bruce	Fread, Gail	Freas, Manette
Frederick, Brian	Frederick, Eric	Frederick, Robert	Fredericks, Jennifer	Frederiksen, Chris	Fredricey, Matt

Fredrickson, Erik	Fredrickson, Karen	Freeborn-rubin, Bob	Freed, Makayla	Freedman, Bob	Freedman, Ken
Freedman, Wendy	Freedom, Rea	Freeman Roth, Ellen	Freeman, Alyssa	Freeman, Andrea	Freeman, Andrew
Freeman, Anna	Freeman, Anne	Freeman, Clare S	Freeman, Dr Rebekka	Freeman, Earl	Freeman, Glenn
Freeman, Gregory	Freeman, Joseph	Freeman, Linda	Freeman, Linda	Freeman, Madeline	Freeman, Mary
Freeman, Michael	Freeman, Myrna	Freeman, Phd, Carrie	Freeman, Phyllis	Freeman, Rhonda	Freeman, Sandra
Freeman, Theresa	Freese, Lisanne	Freewoman, Faith	Frega, Doreen	Frehner, Millicent	Freibrun, Eric
Freid, David	Freiman, Steven	Freitag, Jennifer	Freitas, Amanda	Fremault, Lee	Fremaux, Charlotte
French, Ceridwen	French, Frances	French, Hope	French, James	French, Judy	French, Larry
French, Robert	French, Stephen	Frentzel, Shirley	Frenzel, Reinhard	Frese, Pamela	Freson, Neil
Frethem, Gail	Frey, Elaine	Frey, John	Frey, Kimberly	Frey, Lawrence	Frey, Lisa
Frey, Nate	Frey, Patricia	Frey, Philip	Fricano, Jean	Frick, Dean	Frickel, Scott
Friday, Cheryl	Friday, Tina	Friday-craft, Betty	Fried, Adrian	Fried, Susan	Friedberg, Howard
Friedberg, Ruth	Friedel, Kristen	Frieden, Gary	Friedenbach, Maggie	Friedenson, Louise	Friedhoff, Mark
Friedhoffer, Bob	Friedland, Linda	Fried-lee, Lauri	Friedman, Barry	Friedman, Cherryl	Friedman, David
Friedman, Emily	Friedman, Irwin	Friedman, Jaime	Friedman, Marya	Friedman, Michael	Friedman, Terry
Friedmann, Gary	Friedrich, Darlene	Friedrich, Lawrence	Friedrichs, Florence	Friedrichs, Laura	Friehauf, Mike
Friel, Jan	Friend, Deborah	Friend, Penny	Friend, Peter	Frieri, Frank	Friesen, Debbie
Friess, Helga	Frighetti, Paula	Frigo, Rick	Friis, Rolf	Frisbie, Rebecca	Frisby, Kelly
Frisella, Michele	Frisk, George	Frisk, Julia	Fritsch, Christina	Fritsch, Corinna	Fritsch, Nina
Fritsch, Robert	Fritts, Tina	Fritz, Mike	Fritz, Ronald	Fritz, Tobias	Fritzler, Cyndi
Fritzler, Deb	Frizane, Paul	Frkanec, Miro	Froehlich, Angela	Froese, Robert	Frohboese, Karil
Froiland, K	From, Karen	Fromowitz, Allen & Carol	Fronske, Dave	Frost, Chris	Frost, Deanna
Frost, Derek	Frost, Ehrhard	Frost, Eugene	Frost, G. Thomas	Frost, Jenifer	Frost, Laura
Frost, Linda	Frost, Mary	Frost, Meghan	Frost, Michael	Frost, Veer	Frothingham, Sara
Fruge, Aaron	Fruge, Douglas	Frusteri, Marianne	Frustockl, Ricardo	Fry, Barbara	Fry, Eric
Fry, Gabrielle	Fry, Mandee	Fry, Thea	Frye, Cassie	Frye, Dean	Frye, Douglas
Frye, Minnie Ruth	Fryer, Sherri	Frymoyer, Allison	Fuchs, Lenny	Fuchslocher, Bryna	Fuchsman, Douglas
Fudge, Teresa	Fudger, Maureen	Fuechtmann, Blake	Fuentes, Gerardo	Fuentes, Ivan	Fuentes, Ruver
Fuerstenberg, Mark	Fuessel, Chere	Fugate, Peggy	Fugel, Wayne	Fugina, Vincent	Fuhlman, Gail
Fuica, Isabel M.	Fujimaki, Dychi	Fujioka, Julia	Fujita, Sandra	Fularczyk, Margaret	Fulgenzi, Janet
Fulgham, Sondra	Fuller, Aaron	Fuller, Beverly	Fuller, Don	Fuller, Jason	Fuller, Julia
Fuller, Rebecca	Fuller, Tony	Fullerton, Barbara	Fullerton, Kathy	Fullerton, Molly	Fullman, ED
Fulmer, Robert	Fulton, Jim	Fulton, Russell	Fults, Sandi	Fultz, Maxine	Fulwiler, Michael
Fung, Laura	Fung, Paul	Funk, Jade	Funk, Martin	Funk, Nell	Funkhouser, Betty
Fuqua, Chad	Fura, David	Furcha, Rae	Furgiuele, Migdalia	Furgurson, Neal	Furlan, Roberta
Furman, Elaine	Furman, Jessie	Furman, Laura	Furman, Marcia	Furness, Kathleen	Furno, Sarah
Furr, Richard	Furrow, Darlene	Fursich, Rob	Furst, Tanis	Furukawa, Lee	Fusco, Carol Anne
Fusco, Kayla	Fusco, Thomas	Fusner, Susan	Fussell, Rachel	Futrell, Sherrill	Futterman, Enid
Fuzo, Lori	Fydrych, James	Fysz, Joseph	G, Amy	G, B	G, Becky
G, CC	G, D	G, G	G, K	G, K	G, Lorie
G, S	G, Sabine	G, Steven	G., Randall	Ga, Leti	Gaab, Donna
Gaarcia, Wes	Gaarlandt, Jonathan	Gabele Douglass, Katharine	Gable, John	Gabriel, Ariana	Gabriel, Candace
Gabriel, Jason	Gabriel, Shanta	Gabriele, Timothy	Gabrielle, Maria	Gacad, Cecilio	Gadbois, Claire
Gaddy, Lisa	Gade, Barbara	Gade, Hilarie	Gadsden, U'kera	Gaebe, Rebecca	Gaede, Marc
Gaertner, Diane	Gaess, Jacqueline	Gaetano, Nick	Gaeth, Tracy	Gaffney, Mal	Gaffney, Stephanie
Gage, Michael	Gagemacdonald, Juli	Gagliano, Gasteve	Gagliardo, Pamela	Gagnon, Nick	Gahagandegogorza, Patricia
Gaines, Diana	Gaines, Donna	Gaither, Tanzella	Gajda, Jack	Gakeler, Debra	Galanis, Sophia
Galanis, Tim	Galante, Susan	Galbadores, Anjelina	Galbraith Miller, Ann	Galbraith, Debbie	Galbreath, Mercedes
Galdo, Querido	Gale, Elaine	Gale, Jane	Gale, JC	Gale, Karen	Gale, Michelle
Galick, Jennifer	Galietti, Catherine	Galka, Marcia	Gall, Robert	Gallagher, Brendan	Gallagher, David
Gallagher, Diane	Gallagher, E.	Gallagher, Kathryn	Gallagher, Kathy	Gallagher, Margaret	Gallagher, Michael
Gallagher, Norm	Gallagher, Rev. Terrence	Gallagher, Simon	Gallanosa, Kristin	Gallardo, Angela	Gallatin, Anthony
Gallaugher, Wes	Gallaway, Tina	Gallegos, Claudia	Gallegos, Joseph	Gallegos, Nancy	Gallery, Lynne
Galli, Jean	Galliher, Dianne	Gallo, Angela	Gallo, Dan	Galloway, Adriance	Galloway, Carla

Galloway, Christopher	Gallup, Patricia	Galluzzo, Carolyn	Galotola, Maria	Galterio, Judith	Galvan, Haroldo
Galvan, Luis	Galvan, Nico	Galvin, Theresa	Galyon, Susi	Gamalski, Robert	Gamba, Gabrielle
Gamber, John	Gamble, Albert	Gamble, Albert	Gamble, Fairlee	Gamble, Sara	Gamboa, Brittany
Gambriel, John	Gamelin, Norman	Gamer, Gerald	Gamiao Wallace, Carolyn	Gamsby, Laura	Ganassi, Elinn
Ganassi, Jill	Ganch, Sheila	Gandhi, Dipal	Gandolfo, Deborah	Ganesh, Charanya	Gang, Pete
Gangi, Evan	Ganley, Roxanne	Ganmoryn, Croitiene	Gann, C.	Gann, Sara	Gann, Valeska
Gannon, Elinor	Gannon, Michael	Gannon, Patricia	Gannon, Thomas	Gannon, Wynne	Ganong, Sarah
Gansel, Mariah	Gant, Juliet	Gantenbein, Jen	Ganter, Steven	Gantos, Angela	Ganzhorn, Sarah
Gaponoff, Sharma	Garavaglia, Jo-ann	Garavuso, Nancy	Garbarsky, Howard	Garbato, Kelly	Garber, Barbara
Garber, Carol	Garber, Julie	Garber, Kathy	Garbrick, Kathe	Garcfa Cernuda, Lazaro	Garcia Manzano, Carola
Garcia, Angel	Garcia, Christy	Garcia, Delia Teresa	Garcia, Diana	Garcia, Donita	Garcia, Edward
Garcia, Erik	Garcia, Felipe	Garcia, George	Garcia, Gina	Garcia, John	Garcia, John
Garcia, Juana	Garcia, Leah	Garcia, Luis	Garcia, Luis M.	Garcia, Maria	Garcia, Robert
Garcia, Sandra	Garcia, Sara	Garcia, Sherrie	Garcia, Susan	Garcia, Toni	Garcia, Tori
Garcia, Vickie	Garcialuna, Edgar	Garciaromeu, Albert	Garciatamaran, Ramon	Garde, Carol	Gardiner, Charlotte
Gardner, A.	Gardner, Annah	Gardner, Bob	Gardner, Cheryl	Gardner, Chris	Gardner, Glenda
Gardner, Holly	Gardner, Kent	Gardner, Kirk	Gardner, Kristen	Gardner, Peggy	Gardner, Rose
Gardner, Sheryl	Gardner, Susan	Gardner, Thomas	Gardner, Tina	Gardner, William	Garelik, Susan
Garescher, Marie	Garfinkel, Lillian	Garfinkel, Linda	Garfinkel, Nina	Garg, Anu	Gargaetas, Pat
Gariazzo, Joan	Garitty, Michael	Garland, Pete	Garland, Tammy	Garlena, Sharon	Garlick, Tena
Garlow, Megan	Garman, Ian	Garmus, Diana	Garnaasholmes, Steve	Garneau, Frances	Garner, Ada
Garner, Lynn	Garner, Michael	Garner, Tina	Garnett, Deeann	Garnett, Juanita	Garofalo, Gina Marie
Garofalo, Stephanie	Garone, Karen	Garr, Margaret	Garratt, Liz	Garrecht, Jamila	Garren, Christine
Garren, Susan	Garretson, Diane	Garretson, Jean Ann	Garrett, David	Garrett, David	Garrett, Kay
Garrett, Larry	Garrett, Lory	Garrett, M	Garrett, Patty	Garrett, Shantell	Garrett, Vincent
Garrido, Bryan	Garrido, Rene	Garrison, Ron	Garrou, Julie	Gartin, Courtney	Gartland, Chris
Gartner, David	Gartner, Michael	Gartner, Robert	Garton, Gary	Gartrell, Dona	Garvett, Esther
Garvey, Jenna	Garvey, Lydia	Gary, Antonia	Gary, Jennifer	Gary, Ron	Gary, Sherrill
Garza, Alvaro	Garza, Cris	Garza, Ellen	Garza, Linda	Garza, Nita	Gasbarro, Donna
Gasbarro, Linda	Gasco, Christine	Gaskill, David	Gaskins, Melissa	Gaspar, Elizabeth	Gaspar, Stephanie
Gasparovic, Joe	Gasperment, Nancy	Gasperoni, John	Gates, Amanda	Gates, Annie	Gates, Jane
Gates, Laurie	Gates, Melanie	Gates, Steve	Gathing, Nancy	Gathman, Mary	Gatlin, Wendy
Gatov, Philip	Gattenby, Melissa	Gatto, Peter	Gau, John	Gauci, Christopher	Gaudenti, Nicole
Gaudette, Lynn	Gaudin, Gerard F.	Gaudin, Leo	Gautreaux, Adriane	Gavin, Frank	Gawlik, Jessica
Gawronski, Don	Gawrys, Kelly	Gayken, Aaron	Gayle, Beatrix	Gaynor, Robert	Gazzola, Diana
Gazzola, Linda	Gearey, Christin	Gearhart, Marilyn	Gearhart, Shannon	Gebczyk, Diana	Gecas, Cynthia
Gedge, Joan	Gedlinske, Lauren	Geer, Matt	Gefter, Susan	Gegauff, Anthony	Gehl, Carol
Gehman, Beth	Gehres, Sandra	Gehres, Wesley	Gehribergman, Sandra	Gehring, Wendy	Gehrke, Theresa
Geiger, Richard	Geiger, Richard	Geimer, Nancy	Geisert, Matthew	Geisinger, Pamela	Geisler, Paulette
Geissinger, Anne	Gelardi, Johanna	Gelbart, Susannah	Gelber, Marjorie	Gelden, Ronald	Geldien, Wendy
Gelfer, Michael	Gelina, Althea	Gelinas, Betty	Gellar, Michael	Geller, David	Geller, Leslie
Geller, Richard	Gellman, Doug	Gelpi, Barbara	Gelrings, Ter	Gelsman, Caroline	Gelsomino, Rene
Geluz, Gemma	Gemind, Debra	Gemind, Sara	Gemmell, Doug	Gemmill, Rebecca	Genaze, Matthew
Genco, Kenneth L	Gendron, Bob	Gendronsofferman, Lori	Gendvil, Derek	Genett, Denise	Gengo, Julie
Gengo, Lisa	Gennarelli, Michael	Gennari, Helen	Genovese, Maegan	Gensor, Eda	Gent, Michael
Gentes, Amy	Gentes, Mija	Gentile, Diane	Gentle, Hope	Gentry, Rita	Gentry-moore, Moira
Gentzler, Edward	George, Constance	George, Daniel	George, David	George, Diane	George, Douglas
George, Gerda	George, Heidi	George, Joanne	George, Lois	Georges, Gaye	Georgiou, Alexis
Geotas, Thea	Gephard, David	Geppert, Edward	Geraci, Judith	Geraets, Mary	Gerard, Diane
Gerard, Fabiano	Gerber, Eric	Gercke, Nancy	Gerdesmcclain, William	Geredien, Ross	Gergat, Jim
Gergely, Katrina	Gergely, Sally	Gergertt, Djalila	Gerhardstein, Elaine	Gerhart, Kyle	Gerke, David
Gerlach, Christian	Gerlach, Randy	Gerlitz, Lucinda	Germain, Antoine	Germain, Mary	German, Bonnie
German, Dianne	German, Drew	German, Susan	Germano, Jeff	Gerndt, Robert	Gerondale, Brianna
Geronimo, Patricia	Gerosa, Robert	Geroux, Paula	Gerrard, Ron	Gerry, Randi	Gershenson, Carl

Gershman, Sharon	Gershten, Donna	Gersten, Karina	Gersten, Lewis	Gerstmeyer, H. Virginia	Gertig, Linda
Gertz, Michael	Gervaislynch, Meghann	Gerwens, Shana	Geske, Normie	Gessinger, Remy	Getler, Diane
Getman, Teresa	Gettins, Raymond	Geurkink, Sue	Geurts, Gary	Geyer, Bernhard	Geyer, Lisa
Geyer, Sandra	Ghafari, Cynthia	Ghafari, Jeanie	Gharvey, Ghana	Ghidoni, Don	Ghiraldini, Chrys
Ghitman, Elise	Gholson, Kirsti	Gholson, Tamsen	Giaccardo, Diana	Giaccardo, Gina	Giamanco, Jan
Giambrone, Michelle	Giammatteo, Ralph	Gianakos, Mary	Giannattasio, Mary	Giannone, Mario	Giantomasi, David
Giardina, Philip	Giardino, Jackie	Gibas, Allen	Gibas, Linda	Gibb, Erika	Gibb, Robert
Gibb, Wayne	Gibbons, Beverly	Gibbons, Jennifer	Gibbons, Sasha	Gibbs, Darlene	Gibbs, Elizabeth
Gibbs, Jeanne	Gibbs, Susan	Giblin, Dolores	Giblin, Thomas	Gibson, Amy	Gibson, Barbara
Gibson, Calvin	Gibson, Elizabeth	Gibson, Jayme	Gibson, Jeanne	Gibson, Margaret	Gibson, Mary
Gibson, Maureen	Gibson, Michael	Gibson, Nathan	Gibson, Raymond	Gibson, Rhonda	Gibson, Scott
Gibson, Terry	Gidding, Maria	Giddings, A.	Giddings, Andrew	Giddings, Steven	Giella, Vicki
Giencke, Jill	Gier, Angela	Gies, Arthur	Giese, John	Giese, Mark	Giese, Mark M
Giesen, Gregory	Giese-zimmer, Astrid	Giesick, Christy	Giesy, Daniel	Giesy, Theo	Gifford, Dawn
Gifford, Martha	Gifford, Robert	Giger, Lesley	Gigliello, Ken	Giguere, ED	Giingeresky, Joan
Gilb, Amanda	Gilbert, Alexandra	Gilbert, Amy Sue	Gilbert, Andrea	Gilbert, Camille	Gilbert, Dan
Gilbert, David	Gilbert, Don	Gilbert, Gregory	Gilbert, Holly	Gilbert, J.	Gilbert, Jane
Gilbert, Jay	Gilbert, Jennifer	Gilbert, Judith	Gilbert, Laurie	Gilbert, Lowell	Gilbert, Nathan
Gilbert, Patricia C. And Robert W.	Gilbert, Patrick	Gilbert, Richard	Gilbert, Scott	Gilbert, Sibyll	Gilbert, Tracy
Gilbreath, Shirley	Gilchriest, Anthony	Gilchrist, Alaina	Gilchrist, Amber	Gilchrist, Helen	Gildersleeve, Peggy
Giles, Deborah	Giles, James	Giles, Karen	Giles, Seth	Giles, Thomas	Giles-straight, Carol
Gilgoff, Irene	Gilgosch, Mike	Gilis, Jeffrey	Gilkinson, Julie	Gill, Ayesha	Gill, Dan
Gill, Debbra	Gill, Mary	Gill, Susan	Gillaspie, Richard	Gillaspy, Linda	Gilleland, Carol
Gilleo, Nancy	Gillespie, Ann	Gillespie, Fred	Gillespie, Jenny	Gillespie, Sheryl	Gillette, Kenneth
Gillhouse, Victoria	Gilligan, Ainslie	Gillin, Allen	Gillings, Rhonda	Gillis, Greg	Gillis, Katie
Gillman, Jackson	Gillono, Mark	Gillooly, Bill	Gillooly, Niele	Gilman, Christina	Gilman, Hilda
Gilman, Jane	Gilman, Joy	Gilmore, Elizabeth	Gilmore, James	Gilpin, Kathlyn	Gilroy, Arthur
Gilroy, Bryan	Gilroy, Mary	Gilstrap, Nancy	Gimblet, J.R.	Gindele, Abigail	Gindt, Jennifer
Gingerich, Elizabeth	Gingg, Mary	Gingiss, Jodi	Gingold, Lina	Gingras, Teresa	Gingrich, Nancy
Gingrich, Patricia	Ginnan, Shannon	Ginngriffeth, Patricia Anne	Ginsberg, Barbara	Ginsberg, Gordon	Ginter, Gene
Gioannini, Larry	Gioe, Sarah	Gioffre, Anthony	Gioia, Elio	Gioia, Linda	Gioielli, Lawrence
Gioseffi, Daniela	Giovannini, Catherine	Gipple, Gail	Girard, Cindi	Girard, Elizabeth	Girard, Susan
Girardin, Josephine	Giraud, Isabelle	Giraudier, Nigel	Gire, Nancy	Giri, Lopamudramohanty	Giroux, Andrew
Giroux, Danielle	Girshick, Lori	Girton, Brenna	Gish, Beverly	Gisi, Mikel	Gisoldi, Ines
Gisonno, Yvonne	Gissendanner, Elton	Githens, Micah	Gitschier, Jennifer	Gitter, Brenda	Gittlen, William
Gitto, Ruth	Giuffre, Christian	Giugni, Natalina	Giuliani, Nancy	Giuliani, Roseanne	Given, Karen
Givers, David	Glackin, Joseph	Gladfelter, Barbara	Gladhart, Peter	Gladstone, Jean	Gladwin, Kyle
Glaeske, Lynne	Glait, Susan	Glandon, Clarice	Glansberg, Carol	Glanz, Zachary	Glascoff, Matthew
Glaser, Helene	Glass, Amanda	Glass, Francine	Glass, Jordan	Glass, Leslie	Glass, Margaret
Glassco, Lisa	Glasser, Hannah	Glasser, Joan	Glasser, Pam	Glasser, Tanya	Glassheim, Barbara
Glassman, Joy	Glatt, Pearl	Glatter, Katherine	Glatter-judy, Susan	Glatz, James	Glatz, Kat
Glau, Carol	Glaub, Karen	Glavan, Jill	Glavina, Vesna	Glazar, Maryanne	Glazer, Jeffrey
Gleason, E	Gleason, Jonna	Gleason, Lynn	Glebe, Tony	Glebs, John	Glenn, Andrea
Glenn, Julie	Glenn, Michele	Glewwe, Nathaniel	Glick, Allan	Glick, Art	Glick, Barbara
Glick, Benjamin	Glick, Dick	Glick, Edward	Glick, Lisa	Glick, Melissa	Glick, Robin
Glidden, Janet	Gliem, Deke	Glier, Ingeborg	Glinden, Desiree	Glines, Steve	Glinsky, Natasha
Glock, Ralph	Gloe, Janine's	Glore, Gary	Glover, Barbara	Glover, Janet	Glover, John
Glover, Laura	Glover, Robert	Glover, Terry	Glover, Tim	Gluck, Louisa	Gluckman, Geoffrey
Glynn, Ann	Glynn, Nancy	Goad, Marye	Gobely, Michelle	Gobert, Lenora	Goble, Ron
Godbee, Allycia	Goddard, Sally	Goddard, Tom	Godec, Kathie	Godek, Esther	Goden, G Marie
Godfrey, Sharon	Godinez, Robert	Goding, Lloyd	Godoy, Susan	Godoy, Yuri	Godsey, Phillip
Godsil-freeman, Kate	Godwin, Amy	Godwin, Nancy	Godwin, Patricia	Godzich, Mika	Goe, Judith
Goeckermann, John	Goeken, Murlin	Goeldner, Jacquelyn	Goeldner, Sandra	Goellner, Joseph	Goellner, Paula
Goering, Jean	Goertz, Katherine	Goethel, James	Goettler, N	Goewert, Marie	Goff, Henry

Goff, J	Goff, Karyn	Goff, Samuel	Goff, Sharon	Goga, Alan	Goga, Susan
Goggins, Cathlyn	Goggins, Laura	Goglio, Remy	Gohlke, Linda	Goin, Wayne	Goings, Ladonna
Goins, Cynthia	Goins, Todd	Gola, Douglas	Gold, Ellen	Gold, Ellen	Gold, Josh
Goldansky, Robin	Goldberg, Daniel	Goldberg, Edward	Goldberg, Ellie	Goldberg, Gary	Goldberg, James
Goldberg, Norma	Goldberg, Rich	Golden, Alexandra	Golden, Amy	Golden, Glenn	Golden, Jeffrey
Golden, Jerry	Golden, Kathleen	Goldenberg, Helen	Golden-rigby Washington, Nicole	Goldfeder, Nabha	Goldflies, Barrett
Goldhammer, Melva	Goldin, Jesse	Goldin, Pamela	Golding, Gail	Golding, John	Goldman, Andrew
Goldman, David	Goldman, Judith	Goldman, Judy	Goldman, Lisa	Goldman, Ron	Goldman, Steven
Goldman, Sue	Goldsby, Jerae	Goldsmith, David	Goldsmith, Gail	Goldsmith, Michelle	Goldstein, Carol
Goldstein, Celeste	Goldstein, Freya	Goldstein, Kim	Goldstein, Louis	Goldstein, Sharon	Goldstein, Sonia
Goldstein, Stuart	Goldstein, Susan	Goldstein, Ted	Goldstein-cobb, Roz	Golembeski, Edmund	Golembieski, Suzanne
Golembiewski, Mark	Golinveaux, Joseph	Golonka, Hm, Sister Maryann	Golter, Lindsay	Golz, Cameron	Gomborone, Mike
Gomer, Kimberley	Gomes, Gustavo	Gomes, Holly	Gomes, Jeffrey	Gomes, Krista	Gomez, Cheyla
Gomez, Evelyn	Gomez, Ivanna	Gomez, Ricardo	Gomezherrera, Diana	Gomolka, Denise	Gomolka, John
Gong, Sharon	Gonsalves, Carole	Gonyea, Gerald	Gonzales Ii, Umberto	Gonzales Nielsen, Rose	Gonzales, Amanda
Gonzales, Lorenzo	Gonzales, Susie	Gonzales, Tanya	Gonzalez Chipuli, Cuauhtemoc	Gonzalez Leyva, Marisol	Gonzalez, Amanda
Gonzalez, Andres	Gonzalez, B	Gonzalez, Bryan	Gonzalez, Daniel	Gonzalez, David	Gonzalez, Diana
Gonzalez, Elimaris	Gonzalez, Enrique	Gonzalez, Iara	Gonzalez, Isabel	Gonzalez, Jocelyn	Gonzalez, Jorge
Gonzalez, Kathy	Gonzalez, Kristin	Gonzalez, Lynne	Gonzalez, Manlio	Gonzalez, Patricia	Gonzalez, Paula
Gonzalez, Regina	Gonzalez, Rey	Gonzalez, Silvia	Gonzalez, Veronica	Gonzalez, Victor	Good, Albert
Good, Barbara	Good, Dana	Good, Eileen	Good, Hannah	Good, Marjorie	Gooday, Janis
Goode, Kate	Goodell, Bev	Goodell, Jontelle	Goodelman, Suzanne	Gooden, Derry	Gooderham, Sarah
Goodhart, James	Goodhew, Linda	Goodhue, Brooke	Goodick, Melinda	Goodin, Dale	Goodin, Lee
Goodin, Noelle	Goodlin, Dave	Goodloe, Brandon	Goodman, Arifa	Goodman, Debbie	Goodman, Ellen
Goodman, Greg	Goodman, Jackie	Goodman, Linda	Goodman, Margy	Goodman, Mark	Goodman, Mary
Goodman, Melinda	Goodman, Pamela	Goodnight, Cecelia	Goodpasture, Mona	Goodrich, Cathy	Goodrich, Debra
Goodrich, Gaylee	Goodson, Ashley	Goodson, Gary	Goodson, Pat	Goodwin, Barbara	Goodwin, Gary
Goodwin, Kathy	Goodwin, Kevin	Goodwin, Marci	Goodwin, Natalie	Goodwin, Thomas	Goodwinwalton, Samuel
Goodwyn, Candice	Goodwyn, Kahlil	Goodykoontz, Deborah	Gopinathan, Narayan	Gopysingh, Romattee	Gordo, Jose-adolpho
Gordon, Amanda	Gordon, Bernice	Gordon, Bruce	Gordon, Bruce	Gordon, Dave	Gordon, Delia
Gordon, Elliot	Gordon, Gillian	Gordon, J	Gordon, Jeffrey	Gordon, Jennifer	Gordon, Jessie
Gordon, Jon	Gordon, Judith	Gordon, Marcia	Gordon, Marcy	Gordon, Melissa	Gordon, Nancy
Gordon, Shelley	Gordon, Sherry	Gordon, Suzanne	Gordon-brown, Deborah	Gore, D.M.	Gore, Jean
Gore, Jesse	Gore, Robert	Gorgan, Patrick	Gorges, Robin	Gorgo, Jennifer	Gori??ek, Jose
Gorina, Maya	Gorka, Maryann	Gorman Rn, Bonnie	Gorman, Deborah	Gorman, Shawna	Gorman, Thomas
Gorn, Scott	Gorner, Susan	Gorrin, Eugene	Gort, Susan	Gosche, Jennie	Gose, Gayle
Goshaney, Karen	Gosnell, Rebecca S	Goss, Eva	Gossard, Chris	Gossett, Brenda	Gossmann, Anni
Gostisha, Marla	Got, Monica	Gotaskie, Vickie	Gotis, Christine	Gotjen, Deidre	Goto, Jean
Gottejman, Brian	Gottert, Roswitha	Gottesman, Carol	Gottesman, Mary	Gottesman, Ziva	Gottfried, Susan
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Gottschalk, Steven	Gotvald, Mark	Goudswaard, Lona	Gough, Rip	Gouker, Patti	Gould, Garry
Gould, George	Gould, Jacqueline	Gould, Janet	Gould, Margaret	Gould, Marni	Gould, Raleigh
Gould, Steve Nancy	Gould-donath, Reisa	Gourhan, Judy	Gout, Stephanie	Govaker, David	Gover, Pat And Gary
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Graanoogst, Audrey	Graas, Alex	Grabsch, Dagmar	Grace, Amy	Grace, Kathryn	Grace, Lise
Grace, Patricia	Graceffa, Susan	Grad, Brian	Gradoni, Peter	Graen, Douglas	Graetz, Kay
Graf, Cathleen	Graf, Jolie	Graffagnino, Mary Ann And Frank	Graffeo, Mary T.	Graffin, Jeanne	Grage, Janina
Graham, Catherine	Graham, Gary	Graham, Jan	Graham, Jane	Graham, Jennifer	Graham, Judy
Graham, Karyn	Graham, Lynn	Graham, Lynn	Graham, Madison	Graham, Mary Jo	Graham, Robin
Graham, Shelley	Graham, Susan	Graham, Wendy	Graham,md, Gene O.	Grahambuchanan, Ellen	Grahamwadlon, Martha
Grahnert, Brett	Grajales, Tanya	Grambauer, Macaire	Graminski, DM	Granat, Gary	Granata, Chris

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Grannis, Renee	Grano, Karen	Granofsky, Gabrielle	Grant, Alexander	Grant, Carmen	Grant, Elaine
Grant, Elizabeth	Grant, Gordon	Grant, Jill	Grant, Joyce	Grant, Kristina	Grant, Lynn
Grant, Peter	Grant, Richard	Grant, Vie	Grant, Virginia	Grant-endsley, Fiona	Grass, Rick
Grassi, Catherine	Grassi, Noreen	Grassl, Richard	Grasso, Alexis	Grasso, Lisa	Grattan, Kim
Graube, Davids	Graubner, Gabriel	Graue, Walter	Graul, Kara	Gravance, Rochelle	Graver, Chuck
Graver, Robert	Graves, Caryn	Graves, Denis	Graves, Joan	Graves, John	Graves, Michelle
Gravitch, Julia	Gravitt, Laura	Gravning-fitzgerald, Sheryl	Gray Bounsall, Laurie	Gray, Andrew	Gray, Beverly
Gray, Carla	Gray, David	Gray, Dick	Gray, Glenna	Gray, Hod	Gray, Jack
Gray, James	Gray, Jennifer	Gray, Jennifer	Gray, John	Gray, Laura	Gray, Linda
Gray, Lorraine	Gray, Marjorie	Gray, Mikaela	Gray, Richard	Gray, Roxy	Gray, Sylvia Ruth
Gray, Tom	Gray, Tony	Gray, William	Graybill, Martha Elaine	Graybill, Sasha	Gray-lion, Annelissa
Graymackey, Colleen	Graziosa, Sara	Greaves, Donald	Greaves, Jeannine	Grecco, Eowyn	Grech, B
Grech, Rhyan	Grecki, Bob	Greco, Andrea	Greco, Claudia	Greding, ED	Greehling, Brenda
Greeley, Rebecca	Green- stevenson, Tonya	Green, A.	Green, Alice	Green, Antoinette	Green, Arden
Green, Aundria	Green, Bradley	Green, Carl	Green, Catherine	Green, Catherine	Green, Christine
Green, Connor	Green, Don	Green, ED	Green, Edmond	Green, Ellen	Green, Jamie
Green, Jason	Green, Jeff	Green, Jesse	Green, Judith	Green, June	Green, Kathy
Green, Kristin	Green, Larisa	Green, Lawrence	Green, Louella	Green, Lowell	Green, Malcolm
Green, Martha	Green, Mary Catherine	Green, Maryann	Green, Maynard	Green, Melinda	Green, Michael
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Greene, Vaughan	Greener, Brigette	Greenfeld, Geoffery	Greenfield, Margaret H.	Greenhalgh, Diana	Greenhalgh, Steve
Greenhill, Barry	Greenidge, Jennifer	Greenleaf, Amy	Greenman, Barbara	Greenman, Carl	Greenough, Gregg
Greenspan, Karen	Greenstein, Becca	Greenwood, Ellen	Greenwood, Rachel	Greer, Amy	Greer, Helen
Greer, Jill	Greer, John	Greer, Steffanie	Greer, Stephen	Greeson, Kathryn	Greffin, Christopher
Greger, Sabine	Gregersen, Knut	Gregg, B	Gregg, Brandon	Grego, Ben	Gregoire, Andre
Gregorian, Arthur	Gregorio, Crisologo	Gregory Md, Michael	Gregory, Anne	Gregory, Barbara	Gregory, Barbara
Gregory, Brian	Gregory, Chilton	Gregory, Linda	Gregory, Lynn	Gregory, Maryann	Gregory, Paul
Gregory, Robin	Gregory, Zulma	Greig, Joan	Greig, Laurie	Greil, Judith	Greinke, Pamylle
Greisofe, Salvatore	Grelet, Chris	Grenade, Anne	Gresham, Mary	Gresko, M A	Grey, Rhonda
Grey, Susan	Grib, Dawn	Gribble, Corine	Grice, Gary	Gricevich, Anne	Grider, Tina
Gridley, Linda	Griebling, Brittany	Grier, Linda	Griess, David	Griffen, Ann	Griffeth, Jaclyn
Griffey, Pat	Griffey, Patricia	Griffin Chesterfield, Georgia	Griffin Jr, Leland	Griffin Kanter-kennedy, Patricia	Griffin, AK
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Griffin, Denise	Griffin, Dondi	Griffin, Edith	Griffin, James	Griffin, Lisa	Griffin, Maryiam
Griffin, Pam	Griffin, Russell	Griffin, T	Griffin, Terence	Griffin, Terry	Griffin, Tracey
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Grill, Chris	Grill, Thomas	Grillo, Ghislaine	Grillo, John	Grimecy, Barry	Grimes, Arlene
Grimley, Chris	Grimm, Barry	Grimm, Cynthia	Grimm, Gary	Grimm, Jenna	Grimm, Sherry
Grimm-leasure, Molly	Grinavic, Tierney	Grindell, Jonathan	Grindheim, Lee	Grindle, Rev, Charles	Grinmanis, Stephanie
Grinnell, Michael	Grinthal, Scott	Grisel, Judy	Grisham, Emily	Griswold, Debra	Griswold, Katharine
Griswold, Tracy	Grivner, Gloria	Grmon, Toni	Grober, Rochelle	Groeger, Tim	Groene, Martha
Groener, Theodore	Groeneweg, Nora	Groff, Francis	Groff, Marty	Grogan, Charlotte	Grogan, Deborah
Grogan, Patty	Grohoski, Jacqueline	Groll, Kevin	Gromoll, Norda	Grone, Alexis	Gronemeyer, Susan
Groner, Matt	Gronquist, L Mahina	Groo, Carol	Grosbard, Richard	Grosmark, Barbara	Gross, Alan
Gross, Andrea	Gross, Anne	Gross, Barbara	Gross, David	Gross, David	Gross, Gail
Gross, Georgene	Gross, Herbert	Gross, Howard	Gross, Robert	Gross, Steve	Gross, Todd
Grossenbacher, John	Grossi, Joanne	Grossman, Aaron	Grossman, Bonnie	Grossman, D	Grossman, Deborah
Grossman, Geoffrey	Grossman, Jake	Grossman, Janet	Grossman, Jay	Grossman, Kathleen	Grossman, Mark
Grossman, Richard	Grossman, Saul	Grote, Harald	Groth, Lorie	Grothe, L	Grotzke, Charles

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Grovenstein, Elizabeth	Grover, Anne	Grover, Justin	Groves, Vernon	Grubb, Jacqueline	Grubb, Patricia
Grubb, Sundriya	Grubbs, Kathy	Grubbs, Lisa	Grube, ED	Gruber, Michael	Gruel, Nancy
Gruenau, Douglas	Gruenke, Elaine	Gruhala, Ashley	Gruling, Kay	Grunbaum, Arthur	Grunbaum, Benjamin
Grunbaum, Daniel	Grunblatt, Michael	Grundy, Marty	Grunke, Janet	Grunwell, Margaret	Gruver, Barbara
Grysko, Deborah	Grzegorzewski, Mark	Grzeskowiak, Bonnie	Guajardo, Genesis	Gualario, Lascinda	Guariglio, Barbara
Guarino Spanton, Karen	Guarino, Dolores	Guarisco Jr, Anthony	Guarnieri, Cindy	Guay, Ralph	Guben, Merry
Gubernick, David	Guckian, Michael	Guell, Benjamin	Guenther, Elizabeth	Guerra, Ana	Guerra, Blanca
Guerrero, Patricia	Guerrette, Genevieve	Guerry, M	Gug, Virginie	Guggino, Monique	Guh, H.
Guhanick, Kelly L.	Guhman, ED	Guidry, Mandy	Guier, Richard	Guillen Mu±oz, Juana Luisa	Guillen, Sandra
Guillet, Cliff	Guillet, Susanne	Guillory, Chris	Guindon, Kelly	Guinn, Trina	Guinnup, David R.
Gukelberger, Todd	Gula, Larissa	Gulas, Joseph	Guldi Westhampton, Aleksandra	Guldig, Leigh	Gulick, Amy
Gulick, Ann	Gullett, Orva M	Gullett, Rachel	Gulley, Jane	Gullicksen, Susan	Gullo, Paula
Gullotta, Katharine	Gullotta, Tana	Gum, Barbara	Guma, Christine	Guma, Karen	Guma, Susan
Gumberg, Sherry	Gumm, Brian	Gump, Thomas	Gumpel, Diane	Gumpher, Robert	Gunay, Zeki
Gundersen, John	Gunderson, Ingrid	Gundlach, Howard	Gunn, Janet	Gunn, Mary	Gunnarson, Martha
Gunson, Ina	Gunter, Karlene	Gunter, Marianne	Gunther, Ken	Gunther, Peter	Gupta, Deepika
Gupta, Rahul	Gura, Jennifer	Gurdin, J. Barry	Gurev, Keith	Gurganus, Cassie	Gurney, Brian
Gursahani, Veena	Gursky, Ginny	Gurtman, Audrey	Gurtner, David	Gusch, Elene	Gushue, Rhoda
Gustafson, Cheryl	Gustafson, Chester	Gustafson, David	Gustafson, Duane	Gustafson, Jeffrey	Gustafson, Jill
Gustafson, Mandy	Gustafson, Marcy	Gustafson, Rae Ann	Gustaitis Moss, Rasa	Gut, Sheila	Gutelius, Danielle
Gutelius, Phyllis-an	Guthrie, Amanda	Guthrie, Barrett	Guthrie, Elizabeth	Guthrie, Linda	Gutierrez, Emmylou
Gutierrez, Hilda	Gutierrez, Maggie	Gutierrez, Mary	Gutierrez, Maximillian F. O.	Gutierrez, Roberto	Gutman, Ruth
Gutmann, Todd	Gutsell, Sabina	Gutshall, Tamra	Guttenberg, Marta	Guttridge, Laura	Gutzmer, David
Guy, Earl	Guy, Ronald	Guy, Tim	Guyer, Larry	Guyette, Claressa	Guyette, Peter
Guy-ostrowski, Jamie	Guziwski, Mary	Guzman, Alison	Guzman, Jose	Guzman, Joseph	Guzman, Karin
Gwaltney, A.	Gwiazdon, Danielle	Gwin, Tom	Gwynn, Jamie	Gwynn, Maureen	Gx, Perry
Gyory, Randy	Gyving, Jeff	H, C	H, Daniel	H, Fiona	H, Jack
H, Johana	H, Monica	H, Nikki	H, S	H., Kat	H., Manny
H., T.	Ha, Katherine	Haak, Malina	Haake, Melanie	Haaren, Thomas L	Haas, Eric
Haas, Irene	Haas, Pamela	Haas, Paul	Haas, Sharon	Haas, William	Haase, Anna
Haavik, Kristof	Habas, Janet A	Habecker, Susan	Habelski, Inna	Haber, Raven	Haberman, David
Haberman, Marc	Habermann, Dorothy	Habersang, Rolf	Habershaw, Robert	Habick, Colby	Habick, William
Habrecht, Joanne	Hachey, Alma	Hachicha, Sandra	Hack, Paola	Hack, Todd	Hackel, Helena
Hackett, K	Hackett, Lakshmi	Hackett, Margie	Hackett, Maureen	Hackman, Maria	Hackney, Jean
Had, Aimee	Had, Marianne	Hadcroft, James K	Haddock, Brenda	Haddon, Karlene	Haddouch, Nancy
Hade, Michaeline	Hadler, S	Hadley, Phil	Hadley, Shela	Haefele, Ann	Haelen, Jer
Haendiges, Donald	Haesaert, Stephany	Hafemeyer, Nicole	Hafer, Jack	Haffa, Dee	Haflich, Anne
Hafner, Amanda	Hafner, Sharon	Hagan, Sena	Hagans, George	Hagarty, Megan	Hagele, Bob
Hagele, Mary	Hagen, G.	Hagens, Douglas David	Hager, Jon	Hager, Linda	Hager, William
Hagerman, Deborah	Hagerman, Timothy	Haggard, Alan	Haggerty, Emily	Haglund, Ted	Hagmeier, Clarence
Hagood, Hap	Hagopian, Darlene	Hague, Michael	Hague, Stephen	Hague, William	Hahm, Matt
Hahn, Deb	Hahn, Julie	Hahn, Laura	Hahn, Margaret	Hahn, Mike	Hahn, Susan J.
Hahus, Donna	Haibeck, Karen	Haig, Jamie	Haigh, Pamela	Haije, Robert	Haile, Robert
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Hair, Robert	Haire, Linda	Haire, Rex	Hakam, Alaeddin	Hakim, Rosette	Hakimian, Kenny
Hakkinen, Kari	Haladjian, Krikor	Halbe, Denise	Halbert, Ellen	Halbritter, Christopher	Halcomb, Alyssa
Haldeman, Lynn	Hale Randerspehrson, L.	Hale, Angela	Hale, Betty	Hale, Bruce	Hale, Catherine
Hale, David	Hale, Eileen	Hale, Juanita	Hale, Leona	Hale, Luanna	Hale, Marci
Hale, Sharon	Hale, Wyatt	Haley, Ann	Haley, Janice	Haley, Kim	Haley, Mary
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Hall, D. Kaye	Hall, David	Hall, Dennis	Hall, Donald	Hall, Emily	Hall, Emily
Hall, Eulaine	Hall, Eustacia	Hall, George	Hall, Gregory	Hall, Henry	Hall, James
Hall, James	Hall, Jan	Hall, Jane	Hall, Jean	Hall, Jennifer	Hall, Julie
Hall, Katy	Hall, Keith	Hall, Kimberly	Hall, Leslie	Hall, Linda	Hall, Nancy
Hall, Rene	Hall, Richard	Hall, Robin	Hall, Rose	Hall, Rose	Hall, Shawn
Hall, Silvia	Hall, Stacie	Hall, Stacy	Hall, Stacy	Hall, Stella	Hall, Steven
Hall, Stuart	Hall, Sue	Hall, Velma	Hall, Walter	Hall, William	Hallemeier, Gary
Haller, John	Haller, Maggie	Hallermeier, Nancy	Hallett, Mark	Halley, Jack	Halley, Russell
Halligan, Marcia	Halligan, Michele	Halligan, Sue	Hallisey, Ted	Hallisy, Michael	Hallman, Hollie
Hallman, Janice	Hallmark, Kathy	Hallonquist, Robyn	Hallow, Leah	Halloway, Ann	Hallyburton, William
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Halstead, Alan	Halstead, Susan	Halstead, Thomas	Halter, Pat	Haltom, D	Halverson, Yancette
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Hamblen, Molly	Hamblin, Sheryl	Hamboyan Harrison, T	Hambridge, Moya	Hamburg, Bob	Hamerman, Lois
Hames, Lex	Hamiltn, Constance	Hamilton Burda, Heather	Hamilton, Bonnie	Hamilton, Bonnie	Hamilton, Candace
Hamilton, Chana	Hamilton, Colleen	Hamilton, Darlene	Hamilton, Dorothy	Hamilton, Franklin	Hamilton, James
Hamilton, Janet	Hamilton, Jayne	Hamilton, Matthew	Hamilton, Melody	Hamilton, Pamela	Hamilton, Sally
Hamilton, Shari	Hamilton, Sharon	Hamilton, Tammy	Hamilton, Teresa	Hamilton, Terri	Hamilton, Terry
Hamker, Frances	Hamlin, Della	Hamlin, Randall	Hamm, Bill	Hamm, Dorothy	Hammack, Zulma
Hammarstrom, Bryn	Hammel, Barbara	Hammel, Kirby	Hammer, F	Hammer, Judy	Hammer, Peter
Hammerbeck, Melissa	Hammerstad, Charles B	Hammett, Lori	Hammill, Ronald	Hammond, Alice	Hammond, Anne
Hammond, Brenda	Hammond, Jay	Hammond, John	Hammond, Kathleen	Hammond, Marcella	Hammond, Neil
Hammond, Todd	Hamoy, Liza	Hampel, Mike	Hampton, Brian	Hampton, Donna	Hampton, Matt
Hampton, Susan	Hamrick, Laila	Hamrick, Lauren	Han, Richard	Hanavan, Natalia	Hanbury, Pat
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Hancock, Kelly	Hand, David	Handeland, Ryan	Handford, Janet	Handler, George	Handley, Randy
Hands, Barbara	Handwerker, Steven	Handwerker, Steven	Hanemann, Marcelle	Hanes Goodlander, Lisa	Haney, Susan
Hangen, Joanne	Hanger, James D	Hangley, Rachel	Hanibal, Jeannine	Hanifan, Anastasia	Hanig, Felicia
Hanin, James	Haning, Hedda	Hanke, Jack	Hankins, William	Hanks, Charles	Hanle, Rita
Hanley, Jeanene	Hanley, Mary	Hanlin, Sue	Hanline, Christine	Hanlon, Cindy	Hanlon, Denis
Hanlon, Kevin	Hanly, Michael	Hanna, Connie	Hanna, Harvey	Hanna, Jeff	Hanna, Joanna
Hanna, Kristi	Hannaford, Thomas	Hannah, Shonda	Hannan, Katherine	Hannickel, Matthew	Hannon, Larry
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Hansen, Irene And Peter	Hansen, Jan	Hansen, Jeff	Hansen, Jennifer	Hansen, Joan	Hansen, Joan
Hansen, John	Hansen, Katherine	Hansen, Marc	Hansen, Marcus C.	Hansen, Mark	Hansen, Melanie
Hansen, Mike	Hansen, Neil	Hansen, Robert	Hansen, Sandra	Hansen, Shelley	Hansen, Stephen
Hansen, Tami	Hansen, Tim	Hansen, Wendy	Hansen-butler, Kathy	Hansen-cox, Gloria	Hanser, Barbara
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Hanson, Kinee	Hanson, Mark	Hanson, Mary	Hanson, Molly	Hanson, Nancy	Hanson, Naomi
Hanson, Natalie	Hanson, Ryan	Hanson, Sally	Hanson, Sam	Hansonsmith, Shirley	Hanta, Hashi
Hanus, Jeffry	Hanus, Marietta	Happy, Emily	Harabadji, Andrei	Haraldsen, Jackie	Harand, Nancy
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Harden, Carol	Harden, Sue	Harder, Evelin	Harder, Kate	Hardesty, Linda	Hardgrave, Sondra
Hardgrave, Yvonne	Hardies, Laurie	Hardiman, G	Hardin, April	Hardin, Gina	Harding, Carolyn
Harding, Lisa	Harding, Paul	Harding, Peter	Hardman, Ann	Hardy, Debbi	Hardy, Herman
Hardy, Jane	Hardy, John	Hardy, Nick	Hardy, Stephanie	Hardy, Stephanie	Hardziej, Mary Ann
Hare, ED	Hare, Elena	Hare, Pamela	Hareld, Sandra	Hargett, Libra	Hargosh, Andrew
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Hargrove, Teresa	Harguess, Angie	Harig, Carl	Harju, Merja	Harjung, Courtney	Harker, Christine
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Harlib, Amy	Harlow, Batya	Harlow, Nancy	Harman, Rosalie	Harmath, Elisa Elsa	Harmer, Jill

Harmer, Md, Mba, Lisa	Harmon Snow, Keith	Harmon, Bruce	Harmon, Gary	Harmon, Jacob	Harmon, Kyle
Harmon, Stephanie	Harmon, Terry	Harmon, Virginia	Harmonvalenstein, Megan	Harnedy, Kacy	Harold, Billy
Harp, Carol Lynn	Harp, Carole	Harper, Alan	Harper, Ann	Harper, Barbara	Harper, Bob
Harper, Charesa	Harper, Cindy	Harper, Dot	Harper, Joseph	Harper, Leslie	Harper, Leslie
Harper, Peggy	Harper, Robin	Harper, Vince	Harperwinans, Corey	Harpham, Jason	Harpole, Thane
Harpster, Jason	Harr, Silva	Harrell, Bryan	Harrell, Marlene	Harrell, Sherri	Harrelson, Ernie
Harriman, Katherine	Harrington, Caroline	Harrington, Charlotte	Harrington, Ilene	Harrington, Maria	Harrington, Michael
Harrington, Tyler	Harrington, Vicky	Harris, Anne	Harris, April	Harris, Ariel	Harris, Bob
Harris, Brent	Harris, Brooke	Harris, Cynthia	Harris, Cynthia	Harris, David	Harris, Deborah
Harris, Debra	Harris, Debra	Harris, Donna	Harris, E	Harris, Emily	Harris, Frank
Harris, Gail	Harris, George	Harris, Glenn	Harris, Glenna	Harris, Grandon	Harris, Henry
Harris, Hilary	Harris, Holly	Harris, Hugh	Harris, J.M.	Harris, Jamie	Harris, Jason
Harris, Jenna	Harris, Jennifer	Harris, Jennifer	Harris, Jim	Harris, John	Harris, John W.
Harris, Kathy	Harris, Kenneth	Harris, Krystal	Harris, Kurtis	Harris, Kymberlee	Harris, L.J.
Harris, Linda	Harris, Linda	Harris, Mark	Harris, Melissa	Harris, Mike	Harris, Nellie
Harris, Nichole	Harris, Norma	Harris, Oksana	Harris, Patricia	Harris, Peggy	Harris, Perry
Harris, Renee	Harris, Rhelda	Harris, Robert	Harris, Robert	Harris, Robert & Debra	Harris, Ron
Harris, Ronald	Harris, Scott	Harris, Shirlene	Harris, Shirley	Harris, Tamberlaine	Harris, Thomas
Harris, Wayne	Harris, Wendell	Harrison, Alana	Harrison, Allen	Harrison, Ana Sofia	Harrison, Antje
Harrison, Catherine	Harrison, Cathrine	Harrison, Don	Harrison, Ellen	Harrison, Harry	Harrison, Jennifer
Harrison, John	Harrison, Julie	Harrison, Kenneth	Harrison, Kira	Harrison, Linda	Harrison, Marilyn
Harrison, Mary	Harrison, Norma J F	Harrison, Rev. Jake	Harrison, Robert	Harrison, Rudy	Harrison, Shelby
Harrison, Timothy	Harrison, Wesley	Harriswolff, Ishamea	Harrod, Dawn	Harrod, Florence	Harrold, Candace
Harrower, Jack	Harrower, Laura	Harshberger, Bruce	Harstad, Janell	Hart, Alan	Hart, Barbara
Hart, Carole	Hart, Crystal	Hart, Crystal	Hart, Cynthia	Hart, Dannie	Hart, Jessica
Hart, Johanna	Hart, Kathy	Hart, Kristine	Hart, Margaret	Hart, Matthew	Hart, Michael
Hart, Thomas	Hart, Tony	Harte, Jean	Harte, Mary	Hartenstine, Dennis	Harter, John
Harter, Lynn	Harter, Nancy	Harter, Nancy	Hartford, Carolyn	Hartigan, Carrie	Hartik, Charles
Harting, Danyela	Hartleb, Carole	Hartleben, Christian	Hartley, Barbara	Hartley, James	Hartley, Linda
Hartley, Stuart	Hartlieb, Matthew	Hartman Iii, George	Hartman, Brian	Hartman, Carol	Hartman, Christine
Hartman, Gail	Hartman, Jenny	Hartman, Julia	Hartman, Laura	Hartman, Linda	Hartman, Linda
Hartman, Nancy	Hartman, Stacie	Hartman, Todd	Hartmann, Sandra	Hartnett, Patrick	Hartshorne, Annette
Hartshorne, Jonathan	Hartsong, Marianna	Hartung, Ilah	Hartung, Lynn	Harty, Gail	Hartz, Liz
Hartzheim, Joel	Harvey, Anne	Harvey, Bartlett	Harvey, Bruce	Harvey, Christine	Harvey, Jeanie
Harvey, Jef	Harvey, JO	Harvey, John	Harvey, Mike	Harvey, Pete	Harvey, Shea
Harville, Abbie	Harwilchuk, Vera	Harwood, Joanie	Harwood, Vickie	Hasbach, Corinna	Hasbrouck, Kari
Haseley, Luther	Hasenkamp, Tracy	Haser, Frank	Haser, Papa	Hashem, Diane	Haskell, B
Haskell, Eddie	Haskell, Stephen	Haskellbufghart, Barbara	Haskin, Richard	Haskin, Roberta	Haskins, David
Haskins, Eric	Haskins, James	Haslag, Robert	Hass, Gloria	Hassan, Erin	Hasselbrink, Robert
Hassig, William	Hassler, Holly	Hasson, Edwin	Hastey, M	Hastings, George	Hastings, Melissa
Hastings, Susan	Hastings-kort, Kit	Hasty, Barb	Hatch, Dorothy	Hatch, Emily	Hatch, Joseph
Hatch, Sherill	Hatch, Susan	Hatcher, Barbara	Hatcher, Cindy	Hatcher, Debbie	Hatfield, Gwen
Hatfield, Karen	Hatfield, William	Hathaway, Julia	Hathaway, Megan	Hathorn, Sam	Hatkins, Hugh
Hatsis, Elaina	Hattendorf, Ethan	Hattman, Karen	Hauber, Barclay	Hauch, John W	Hauck, Barb
Hauck, Grant	Hauck, Helen	Hauck, Molly	Haude, Leaann	Hauer, Nancy	Haueter, Elisabeth
Hauf, John	Haugen, Bob	Haugen, David	Haugen, Russell	Haugh, Erin	Haun, Pamela
Haunhorst, Martin	Haupt, Annie	Haupt, Carolyn	Haupt, Lois	Haupt, Patricia	Hauptfeld, Vera
Hauser, Karen	Haussmann, Alex	Hauswald, Christina	Havan, Artineh	Havanec, Shaun	Havas, Eva
Havassy, Nancy	Havel, Timothy	Havens, Enid	Haver, Virginia	Haverback, Sister Betty Jean	Haverkamp, Kathy
Havir, Mary	Havlik, Hugh	Havrilla, Robert	Hawes, John	Hawes, John	Hawes, Sarah
Hawes, Steven	Hawk, Grace	Hawk, Martha And Lewis	Hawk, Spirit-eagle	Hawkes, Joann	Hawkes, Jordan
Hawkins, Angela J	Hawkins, Denise	Hawkins, Don	Hawkins, Julia	Hawkins, Lee	Hawkins, Marilou
Hawkins, Mary	Hawkins, Michelle	Hawkins, Patricia	Hawkins, Phyllis	Hawkins, Rebeka	Hawkins, Rob
Hawkins, Tom	Hawkins, Victor	Hawkshead, Jay	Hawley, Lewis	Hawley, Valarie	Haworth, Destiny

Hawthorn, Pat	Hawthorne, Tim And Leann	Hay, Andrew	Hay, Gavin	Hayashi, Koji	Haybron, M
Haycock, Theresa	Hayden, Michael	Hayden, Monica	Hayden, Tiffany	Haydt, Marcy	Hayduke Grenard, Mark
Hayenga, Jon	Hayes, Angela	Hayes, Cathleen	Hayes, Jeanne	Hayes, Jennifer	Hayes, Joseph
Hayes, Kenneth	Hayes, Kim	Hayes, Linda	Hayes, Maggi	Hayes, Marilyn	Hayes, Mary
Hayes, Maureen	Hayes, Maxine	Hayes, Pauline	Hayes, Ryan	Hayes, Scott	Hayes, William
Hayman, Jon	Hayne, Janice	Haynes, Andrew	Haynes, Anne	Haynes, Annette	Haynes, Cynthia
Haynes, Michelle	Haynes, Rebecca	Hays, Bob	Hays, Laura	Hays, Petra	Hays, Terri
Hayward, Kelly	Hayward, Michelle	Hayward, Paul	Hayward, Shannon	Hayward, Susan	Hayworth, Amy
Hayworth, Steven	Hazel, Chris	Hazelhofer, Galen	Hazelton, Judith	Hazen, Alona	Hazen, Roxanne
Hazlehurst, Charle	Hazynski, Michael	Hazzard, Sandra	Hdz., Marlen	He, Carolina	Head, Carla
Head, Kris	Head, Margret	Head, Susan	Headley, Colleen	Heagy, Lorraine	Heagy-len, Linda
Heald, Mark	Healey, Frances	Healey, Shannon	Heanue, Muriel	Hearn, Jeffrey	Hearne, Ray
Hearon, Marlene	Heart Inc, One	Heaston, Lois	Heath, Douglas	Heath, Jamie	Heath, Jolene
Heath, Liana	Heath, Linda A.	Heath, Mary	Heath, Roland	Heath, Suzanne	Heatherly, Debra
Heatherly, Margaret	Heath-shepard, Holly	Heaton, Keith	Heaton, Sam	Hebert, Judith	Hebert, Lee & Sandra
Hebert, Melissa	Hebert, Sarah	Hebley, S	Hecht, Nathan	Heckler, John	Heckman, David
Heckman, Lee	Heckman, Tom	Hecox, Eric	Hedal, Melissa	Hedberg, Anne	Hedberg, Jeanne
Hedblom, Mary	Heddens, Helen	Hedemark, Justin	Hedge, Belinda	Hedgecock, James	Hedger, Lloyd
Hedges Hatfield, Annemarie	Hedges, Tom	Hedrick, Erick	Heer, Ruth	Heermans, James	Heffingerhernandez, Helena
Heffroncartwright, Pat	Hefling, Tracy	Hegarty, Barbara	Hegedus, Barbara	Hegemeyer, Mike	Hegfield, Laura
Hegge, Steve	Heggs, Kathryn	Hegland, Gayle	Hehn, Art	Hehn, Paul	Heide, Andra
Heide, Tyler	Heiden, Patricia	Heighberger, Holly	Heiks, Kristina	Heilala, Alexis	Heiland, William
Heilenbach, Barbara	Heiler, Todd	Heilman, Jessica	Heilmayr, Anna	Heim, Anka	Heim, Donna
Heiman, Thomas	Heimbaugh, Brook	Heimlich, Donna	Hein, Inez	Heindl, Rebecca	Heines, A. M.
Heiney, Mike	Heinlein, Richard	Heinly, Bridgett	Heinrich, Amanda	Heinrich, Julie	Heinrich, Kim
Heinrichs, Kathy	Heins, Suzanne	Heinsich, Carmen	Heinsohn, Michael	Heintz, Karen	Heintz, Nancy
Heintzelman, Crystal	Heinz, Jenny	Heinzelman, Stephen	Heiser, Dennis	Heiser, Mary	Heiserman, Andrew
Heithaus, Melissa	Heitholt, Bill	Heitz, Marcia	Helart, Tina	Helaudais, Jamie	Held, Andrew
Held, Dieter	Held, Michael	Heldman, Keith	Heldwarmkessel, Jeanne	Helenchild, Liz	Helfrich, Grace
Helfrich, Joel	Hellekson, Debra	Heller, Jesse	Hellerman, Arlene	Hellmuth, Cynthia	Helm, Rachel
Helman, Connie	Helman, Eliot	Helmer, Edward	Helmer, Jake	Helmholt, Jennifer	Helms, Dawn
Helms, Sue	Heloskie, Paul	Helt, Ann	Helton, Billy	Helton, Rebecca	Helvie, Robert
Hemenway, Mark	Hemenway, Matthew	Hemingway Feuer, Anne	Hemingway, Carol	Hemingway, Valentine	Hemm, James
Hemmer, John	Hemming, Kelsey	Hemminger, Katherine	Hemp, Peter	Hempel, Blake	Hempel, Drew
Hempel, Liv	Hemphill, Meghana	Hemphill, Patricia Joan	Hemzacek, Elizabeth	Henault, Barbara	Henden, Linda
Henderson, Alma	Henderson, Ceacy	Henderson, Diana	Henderson, Douglas	Henderson, George	Henderson, J. Michael mike
Henderson, Jenna	Henderson, Lara	Henderson, Lela	Henderson, Maria	Henderson, Martin	Henderson, Patricia
Henderson, Sandra	Henderson, Suzy	Henderson-mills, Peg	Hendon, Charmaine	Hendon, June	Hendrey, Elisa
Hendrick, Glenn	Hendrick, Mona	Hendricks, Diane	Hendricks, Geoffrey	Hendricks, Jon	Hendricks, Judith
Hendricks, Kayla	Hendricks, Kaylee	Hendricks, Natalie	Hendricks, Richard	Hendricks, Susan	Hendrickson, Ernie
Hendrickson, Jennifer	Hendrix, Allan	Hendry, Dawn	Hendry, Valerie	Hendzel, Charles	Heneveld, Amy
Hengesbaugh, Matt	Henisse, Patricia	Henjum, Pamela	Henkes, Sally	Henley, Charlene	Henley, Pamela
Henneman, Chip	Henner, Florette	Hennessy Kyle, Elizabeth	Hennessy, Huntley	Hennessy, Nicholas	Hennessy, Patrice Casey
Henney, Kim	Hennigar, Rick	Henning, Brian	Henning, Glenda	Henning, Marcia	Henning, Nancy
Henninger, Daniel	Henninghausen, Amelia	Henrich, Dr. Alexander	Henriksen, Deborah	Henrikson, Lars	Henriques, Charmaine
Henry, Amy	Henry, Anne	Henry, Devin	Henry, Helen	Henry, Helen	Henry, Janan
Henry, Jane	Henry, Jocelyn	Henry, Robin	Henry, Sheri	Henry, Tamara	Henry, Terri
Henschel, Sandra	Hensel, Dean	Hensgen, Eric	Henshaw, Mel	Hensley, Andrew	Hensley, Kim
Henson, Joey	Henson, Lana	Hentzen, Kim	Henzel, William	Henzler, Neal	Hepner, Haylee

Hepner, Rick	Herakovich, Thomas	Herb, Emily	Herbers, Jill	Herbert, Annabelle	Herbert, Jessica
Herbert, Lauren	Herbert, Mari	Herbert, Patrick	Herbert, Wendy	Herbst, Daniel	Herbst, Heather
Herbst, John	Herden, Donald	Herink, Max And Mary	Herlan, James	Herlihy, John	Herlihy, Peggy
Herlinger, Nancy	Herman, Allan	Herman, Anna	Herman, Dorothea	Herman, John	Herman, Joshua
Herman, Tim	Hermann- metzger, Nicole	Hermann, Bev	Hermann, Birgit	Hermann-wu, Kate	Hermonat, Kenneth
Hernandez, Adrian	Hernandez, Asaneth	Hernandez, Christina	Hernandez, Dr. Nicholas	Hernandez, Edween	Hernandez, Elizabeth
Hernandez, Eloy	Hernandez, Jorge	Hernandez, Juan	Hernandez, Liz	Hernandez, Luis	Hernandez, Maria
Hernandez, Maria L.	Hernandez, Mariana	Hernandez, Mauricio	Hernandez, Rosa	Hernandez, Victoria	Hernandez, Viola
Hernandez, Yolanda	Hernday, Ann	Herner, Betty Jean	Hero, Robin	Herold, Ana	Heron, Krista
Heron, Veronica	Herr, Alec	Herren, Amy	Herren, Doug	Herrera, Desiree	Herrera, Kathleen
Herrera, Ramiro	Herrera, William	Herrgesell, Ron	Herrick, Dianne	Herring, Carol	Herrlinger, Julie
Herrmann, Dorene	Herrmann, Linda	Herrnstadt, Howard	Herron, Andria	Herron, Trish	Herschlag, Herb & Jane
Hersh, Sandra	Hershbain, Charlene	Herten, Margaret	Herther, James	Herting, Edward	Hertzig, Joyce
Hervert, Carla	Herwig, Gary	Herzer, Sibylle	Herzer, Susan	Herzinger, Glenn	Herzog, Robert
Herzog, Tina	Heske, Amanda	Hesler, Gary	Hess, Carolyn	Hess, Evelyn	Hess, Jonathan
Hess, Matthew	Hess, Regula	Hess, Sandy	Hess, Steve	Hess, William	Hesselink, Joanne
Hesselmann, Patrick	Hessler, Navada	Hessley, Thomas	Hester, Lori	Hestnes, Elizabeth	Hetcher, Aaron
Hetelle, Jon	Hettema, Lee	Hettenbach, Gerri	Heuman, Christopher	Heverly, Dwinell	Hewett, Rosemary
Hewitson, Sally	Hewitt, Anne-marie	Hewitt, Christina	Hewitt, Jaymee	Hewitt, Maev	Hewitt, Nancy
Hewson, Susie	Heyde, Christiane	Heyer Coyne, Ellis	Heyler, Dorayne	Heyman, Lynne	Heymann, Gary
Heymans, Mariana	Heynyszyn, John	Heyworth, Patience	Hiatt, Shannah	Hiatt, Vonnie	Hibbard, Jeff
Hibben, Walker	Hibshman, Steven	Hickey, Brittany	Hickey, Fran	Hickey, P	Hickey, Patricia
Hicklin, Mary	Hickman, James	Hickory, Arlene	Hicks, Birgitt	Hicks, Christine	Hicks, Ellar
Hicks, Jerry	Hicks, Richard	Hicks-severn, Percy	Hidalgo, Cheryll	Hidojannis, Andreas	Hieb, Laurel
Hiebert, Eldon	Hiestand, Nancy	Higa, Susan	Higdon, Maxxcell	Higginbotham, Walter	Higgins, Chelsea
Higgins, Cherie	Higgins, Daniel	Higgins, Julie	Higgins, KA	Higgins, Patricia	Higgins, Quinn
Higgins, William	Higginson, Bob	Higginson, Norman	Higham, Nancy	Highers, Shirley	Hight, Jeff
Hight, Mary Ann	Hightower, Elisha	Hights, Sharyn	Hijar, Shirley	Hijaz, Tarek	Hilbert, Dee
Hilbertz, Halona	Hilborn, Doug	Hild, Harvey	Hilde, Jean	Hildebrand, Valerie	Hildebrand, Virginia
Hildebrandt, Carole	Hildebrandt, Jamie	Hildebrandt, Linda	Hildenbrand, Pamela	Hildick, Stacey	Hildner, David
Hiles, Dustin	Hilf, Lawrence	Hilfiker, Phil	Hilkovitch, Nicole	Hill, A	Hill, Alexander
Hill, Anna	Hill, Averlon	Hill, Bonnie	Hill, Carole	Hill, Charlene	Hill, Cyndi
Hill, Daniel	Hill, Don	Hill, Ernest	Hill, George R.	Hill, Ginger	Hill, Jacqueline
Hill, Jennifer	Hill, Jenny	Hill, Jim	Hill, Kelley	Hill, Knut	Hill, Lanna
Hill, Margaret	Hill, Maria	Hill, Marilyn	Hill, Martha	Hill, Misako E	Hill, Monika
Hill, Nastassia	Hill, Rosie	Hill, Ross	Hill, Sara	Hill, Sheri	Hillard, Ailis
Hillard, Joyce	Hillary, Mark	Hille, Pat	Hillen, Melissa	Hilliard, Kathleen	Hillier, Marla
Hillier, Steven	Hillman, Mary	Hillman, Stephanie	Hills, JO	Hillson, Miriam	Hillstead, Karolyn
Hillstrom, Beverly	Hilt, Kim	Hilton, Jeri	Hilton, Mary Lois	Hilton, Nancy	Hiltz, Dan
Himebaugh, Glenn	Hinch, Dale	Hindley, Judy	Hinds, Elenita	Hinds, Mark	Hinds, Minori
Hinely, Bill	Hines, Cynthia	Hines, Dolores	Hines, Kylie	Hines, Nancy	Hines, Norman
Hines, Ryan	Hiniker, Diane	Hink, Sally	Hinkle, Phil	Hinkley, Cynthia	Hinkson Ii, William Harold
Hinojosa, Bridget	Hinojosa, Thomas	Hinsberger, Wendy	Hinshaw, Ann	Hinshaw, Ann	Hinshaw, Tammera
Hinson, Becky	Hinson, Doris	Hinton, Carolyn	Hinton, Eugene	Hinton, Karla	Hintsa, Eric
Hinze, Stewart	Hiolle, Karin	Hipps, Barbara	Hirsch, Harriet	Hirsch, Justin	Hirsch, Leigh
Hirsch, Matthew	Hirsch, Ronald	Hirsch, Stephen	Hirschelman, Lynne	Hirschenhofer, Kurt	Hirschhorn, Valerie
Hirschman, Mark	Hirsh, Sidney	Hirshon, Maynard J	Hirshoren, Harri	Hirt, Deb	Hirtle, John
Hisatomi, Lindy	Hiscock, Sheila	Hitchcock, Michael	Hittle, Mike	Hix, Linda	Hixson, Taylor
Hiza, Diana	Hladky, Christa	Hlat, Mike	Hline, Nancy	Hlodnicki, Bruce	Hnatowich, Donald
Ho, Ivy	Hoagland, Dona	Hoagland, James	Hoagland, Linda	Hoak, W Katherine	Hoare, Molly
Hoare, Patricia	Hobaugh, Dustin	Hobbs, Amanda	Hobbs, Jana	Hobbs, Steven	Hobson, Kelvin
Hocevar, Renee	Hoch, Elizabeth	Hoch, Lisa	Hochalter, Jon Bradley	Hochberg, Adrienne	Hochberg, Paul
Hochendoner, Bernard	Hochfellner, Peter	Hochheiser, Harry	Hochstedler, Ronn	Hochstetler, Susan	Hochwald, Bari
Hocker, Dale	Hockin, Deidre E.	Hockman, Barbara	Hockman, John	Hodes, Harold T.	Hodgdon, Roberta

Hodges Hull, D.K.	Hodges, Christie	Hodges, Elizabeth	Hodges, Frances	Hodges, Kara	Hodges, Karen
Hodges, Nancy	Hodges-howell, Brenda	Hodgkins, Steve	Hodgsonpalcek, Joyce	Hodie, Jake	Hodovan, Francine
Hodson, Mary	Hoeborn, Joan	Hoeft, Bernadine	Hoehns, Kevin	Hoekstra, Heather	Hoekstra, John
Hoelbling, Walter	Hoeltzel, Mick	Hoelzer, Michelle	Hoenes, William	Hoerlein, Sara	Hoerner, Dennis
Hoess, Joseph	Hoex, Christine	Hof, Charles	Hofberg, Eva	Hoff, Ann	Hoff, Anne
Hoff, Beverly	Hoff, Marilyn	Hoff, Marsha	Hoff, Mary	Hoffman, Bob	Hoffman, Char
Hoffman, Corrinne	Hoffman, Courtney	Hoffman, Curtis And Jane	Hoffman, David & Helene	Hoffman, Eric	Hoffman, H
Hoffman, Jason	Hoffman, Karen	Hoffman, Laurie	Hoffman, Marc	Hoffman, P.	Hoffman, Roberta
Hoffman, Sage	Hoffman, Sue	Hoffman, Vanessa	Hoffman, William	Hoffmann, Heidi	Hoffmann, Karen
Hoffmann, Karin	Hoffmann, Randi	Hoffmann, Tanja	Hoffmann, William	Hoffmaster, Danna	Hoffner, Alan
Hofgren, Don	Hofheins, Paul R	Hofland, Freda	Hofman, Peter	Hofman, Phyllis	Hofmann, Curt
Hofmann, Janet	Hofmann, Korene	Hofmann, Michelle	Hofner, Diane	Hogan, Brian	Hogan, Diane
Hogan, Dick	Hogan, Jack	Hogan, John	Hogan, John	Hogan, Judith	Hogan, Michael
Hogan, Michell	Hogan, Rita	Hogan, Tom	Hogard, Patricia	Hogarty, Ellen	Hogger, Chris
Hogue, Walter	Hohbach, James	Hohenshelt, Felicity	Hohl Kennedy, Jonathan	Hohl, Susan	Hoiwley, Stanislaus
Hokanson, Jerry	Hokanson, Kerry	Hoke, Bethany	Hoke, Carol	Hokonson, Suzi	Holahan, Theresamarie
Holbrook, Sonja	Holcomb, Barb	Holcomb, Kyleigh	Holcombe, Cassie	Holden, Cathy	Holden, Eileen
Holden, Eileen	Holden, Linda	Holder, Chris	Holder, Elisabeth	Holder, Matthew	Holder, Nathan
Holder, Sonja	Holderith, Erika	Holder-neal, Kaye	Holdren Jr, Benny	Holgersen, Karen	Holick, Karen
Hollaar, Audrey	Holland, Amanda	Holland, Charlie	Holland, Dianna	Holland, James	Holland, Jennifer
Holland, Jo Ann	Holland, Jonathan	Holland, Kate	Holland, Lauren	Holland, Lindsay	Holland, Melissa
Holland, Tanya	Holland, Terri	Holland, Wendy	Hollander, Nicholas	Hollander, Wilma	Hollar, Jeffrey
Hollaway, Luvander	Hollembeak, Demaris	Holleran, Mary	Holley Taylor, J.	Holley, Amy	Holley, J.
Holley, Lynne	Holley, Richard	Hollibaugh, Linda	Holliday, Carolyn	Holliday, T	Holliday, Tricia
Hollie, Christina	Holliman, Aurelia	Hollingsworth, Judy	Hollingsworth, Kathleen	Hollingsworth, Rochelle	Hollington, Betsy
Hollinrake, Mark	Hollis, Alison	Hollis, Glenda	Hollis, Jacque	Hollis, Kilah	Hollis, Kimberly
Hollis, Patrick	Hollister, Caitlin	Hollister, Sidney J.p.	Hollmann, L.	Hollnd, Gabriele	Hollon, Leanna
Hollosi, Christopher	Holloway, Elizabeth	Holloway, Kathleen	Hollowell, Karen	Holm, Gordon	Holm, Mary
Holm, Mary	Holm, Samantha	Holman, Clarisse	Holman, James L.	Holman, Kyva	Holmbeck, J
Holmes, Adrienne	Holmes, Gail	Holmes, Lawrence	Holmes, Lorna	Holmes, Marni	Holmes, Matthew
Holmes, Paula	Holmes, Stefanie	Holmes, Stephanie	Holmes, Susan	Holmes, Tara	Holmes, Todd
Holmes, Tom	Holoduek, Jr., John	Holowczak, Barbara	Holsinger, Gayle	Holsomback, Tyla	Holstrom, Michael
Holt, Alan	Holt, Amy	Holt, Bill	Holt, Catherine	Holt, Deb	Holt, Debi
Holt, Kendra	Holt, Lori	Holt, Mary	Holt, Randi	Holt, Rhonda	Holt, Sree
Holthaus, Tracy	Holtier, Elise	Holtier, Frederich	Holton, Peggy	Holtz, Eric	Holtzapple, Greg
Holtzman, Dorothy	Holub, Mark	Holwager, Andrea	Holzbauer, Gary	Holzer, Joseph	Holzer, Rebecca
Holzrichter, Gail	Holzwart, M	Hom, Nancy	Homan, Evelyn	Homan, Jeffrey	Homan, Peter
Homenko, Deborah	Homer, Mike	Homer, Rachel	Homer, Shelby	Homick, Michael	Hommel, Teresa
Homrig, William	Homsey, Ellen	Hon, Don	Honeycutt, Morris	Honican, Albert	Honigsblum, Alexander
Honish, Robert	Honkanen, Paula	Hoo, Lanlan	Hood, Edwin	Hood, Jan	Hood, Jerry
Hood, Nick	Hood, Shelby	Hoodwin, Marcia	Hoofard, Sandra	Hook, Misty	Hooker, Yvonne
Hooley, Jordan	Hooper, Debbie	Hooper, Jeffrey	Hooper, Paige	Hooper, Steve	Hooper, Vanessa
Hoopes, Anne	Hooson, Clare	Hoot, Lois	Hoover, J.	Hoover, Katherine	Hoover, Maurice
Hoover, Morgan	Hoover, Shawn	Hoover, Sherman	Hop, David	Hope, Angela	Hope, Phillip
Hopewell, Sara	Hopkins, Ardeith	Hopkins, Bailey	Hopkins, Courtney	Hopkins, Eric	Hopkins, George
Hopkins, Jean	Hopkins, Jeff	Hopkins, Lisa	Hopkins, Marsha	Hopkins, Maxin	Hopkins, Shayne
Hopkins, Sylvia	Hopkinson, Elizabeth	Hopman, Tammy	Hopp, Brian	Hoppe, Brian	Hoppe, Judy
Hoppe, Susan	Hoppe, Sydney	Hoppenbrouwers, Elke	Hopper, Joshua	Hopper, Kitty	Hopper, Tom
Hoppmann, Sandra	Hopson, David	Hopster, Bonnie	Hoque, Ati	Horan, Debby	Horan, Kate
Hordynskyj, Alexandra	Horeftis, Heidi	Horkitz, Lauri	Horman, Nancy	Hormel, Michael	Horn, Carla
Horn, Keith	Horn, Roger	Horn, Susan	Hornaday, Nel	Hornbacker, Chris	Hornberger, Karen

Hornberger, Kathy	Hornbuckle, Jovohn	Horne, Lee	Horne, Paul	Horne, Wendy	Horne, William
Hornemann, Joerg	Horner, Jerry	Horner, Ron	Hornick, Diana	Hornsby, Janet	Horowitz, Janie
Horowitz, Laura	Horowitz, Pamela	Horowitz, Tina	Horsburgh, Jenny	Horst, Art	Horstman, Kara
Horton, Charlotte	Horton, Deanna	Horton, Kamela	Horton, Larry	Horton, Michael	Horvath, Elizabeth
Horvath, Eric	Horwitz, Eric	Horwitz, Martin	Hosea, Marilyn	Hosp, William	Hostetter, Margaret
Hotch, Marthanne	Hotchkiss, Elizabeth	Hotchkiss, Karen	Hotovy, Justin	Hottenstein, Tara	Houchen, Amy
Hougham, Tom	Houghton, Natalie	Houlahan, J. M.	Houle, Ethan	Houlette, Ryan	Houlik-ritchey, Emily
House, Anitra	House, Elizabeth	Houseal, Mary Ellen	Houseworth, Bradley	Houshel, Carrie	Housinger, Elden
Houska, Steven	Houston, Barbara	Houston, Mandi	Houston, Meghan	Houston, Nancy	Houston, Roy
Houtz, Sue	Hoven, Debra	Hovey, Roseanne	Hovis, Tamelia	Hovorka, Annette	Howard, Arthur
Howard, Barbara	Howard, Bryan	Howard, Carl	Howard, Chris	Howard, Connie	Howard, Deborah
Howard, Edward	Howard, Erin	Howard, Eugene	Howard, Felice	Howard, John	Howard, Kristen
Howard, Linda	Howard, Mark	Howard, Mark	Howard, Mary	Howard, Michial	Howard, Nancy
Howard, Noah	Howard, Ronald	Howard, Sally	Howard, Virgie	Howarth, James	Howe, Duane
Howe, Julia	Howe, Rebecca	Howe, Tonia	Howell, Adrianna	Howell, Crystal	Howell, Cynthia
Howell, Darliene	Howell, Jack	Howell, Jay	Howell, Jessica	Howell, Lisa	Howell, Norman
Howell, Sandra	Howell, Shelly	Howell, Sydney	Howell, Trudi	Howerton, Craig	Howerton, Jack
Howerton, Neal	Howerton, Sophia	Howes, Abigail	Howie, Janice	Howie, Linda	Howk, Amy
Howland, Taggart	Howlett, Ariel	Howlett, Julia	Howren, Kathleen	Hoye, Jeanette	Hoyer, Robert
Hoyle, Cindy	Hoyt, Diane	Hoyt, Elizabeth	Hoyt, Roberta	Hrenda, Mary	Hreso, Lucia
Hribar, David	Hrifko, Barbara	Hristov, Vik	Hruschka, Peter	Huang, Hans	Huang, Karissa
Huang, Shihfeng	Huarachi, Michael	Huard, Karla	Hubacek, Richard	Hubacker, Gloria	Hubbard, Ann
Hubbard, Craig	Hubbard, Dan	Hubbard, Dorothy	Hubbard, Mary	Hubbard, Michelle	Hubbard, Rebecca
Hubbard, Scott	Hubbard, Terrance	Hubbell, Aaron	Hubbell, Richard	Huber, Anne	Huber, Charles
Huber, Lea	Huber, Tara	Hubert, Ron	Huckaba-paiz, Sharol	Huckins, Harald	Huda, Fabi
Hudak, JO	Huddart-wolfe, Loretta	Huddleston, Charles	Huddleston, Leah	Huddlestone, Laura	Hudgens, Angela
Hudgens, Julia	Hudgins, Jerry	Hudon, Karen	Hudson, Anne	Hudson, Benjamin	Hudson, Dianne
Hudson, Elaine	Hudson, Harry	Hudson, John	Hudson, Marcella	Hudson, Michelle	Hudson, Pat
Hue, Cidney	Huebener, Roslyn	Huebner, Amy	Huebner, David	Huenefeld, Mary-alyce	Hueneke, Edward
Hueper, Naira	Huerta, Brandy	Huerta, Carolynn	Huerta, Thesa	Huerth, Vicky	Huether, N
Huey, Edward	Huff, Emily	Huff, Molly	Huff, Richard N	Huffaker, James	Huffman, Gwendalyn
Huffman, Kathy	Huffman, Melodie	Hufford, Michelle	Hufford, William	Hufnagel, Glenn	Hufty, Sean
Huggenvik, Jodi	Huggins, William	Hughes, Angela	Hughes, Chris	Hughes, Christopher	Hughes, Dwight
Hughes, Elaine	Hughes, Gail	Hughes, Jan	Hughes, Janice	Hughes, Jeff	Hughes, Joan
Hughes, Joe	Hughes, Karen	Hughes, Kenneth	Hughes, Kevin	Hughes, Kimberly	Hughes, Laura
Hughes, Laurel	Hughes, Lauren	Hughes, Linda	Hughes, Linda And Howard	Hughes, Liz	Hughes, Lynne
Hughes, M.A.	Hughes, Mark	Hughes, Melissa	Hughes, Melvin	Hughes, Richard	Hughes, Vicki
Hui Shih, Ya	Hukari, Susanne	Hulbert, Susi	Hulce, Richard	Hulick, Stephen And Kathleen	Hull, Charles
Hull, Gary	Hull, Guadalupe	Hull, Juanita	Hull, Pieter	Hull, Ronald W.	Hull, Samantha
Hullihen, Marta	Hulsey, Tamara	Hultberg, Crystal	Hultgren, Raso	Human, Margaret	Hume, Fallon
Hume, Ted	Humenik, Gary	Humiston, Brian	Humiston, Jennifer	Humphrey, Brian	Humphrey, Carol
Humphrey, Seth	Humphrey, Thomas	Humphreys, Lee	Humphreys, Marla	Humphreys, Paige	Humphries, Delwyn
Humpston, Kat	Huneke, Tom	Hung, Pat	Hunkler, Lisa	Hunn, Steven	Hunnewell, Sarah F
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Hunt, Debra	Hunt, Donald	Hunt, Eileen	Hunt, Elizabeth	Hunt, Greg	Hunt, James
Hunt, Jill	Hunt, Jonathan	Hunt, June	Hunt, Kathleen	Hunt, Myphon	Hunt, Obie
Hunt, Obie	Hunt, Pam	Hunt, Robert	Hunter, Andrew	Hunter, Caroline	Hunter, Chris
Hunter, Debra	Hunter, Don	Hunter, Elizabeth	Hunter, Janice	Hunter, Joann	Hunter, Kelly
Hunter, Margaret	Hunter, Margie	Hunter, Michael	Hunter, Nan	Hunter, Sue	Hunter, Suzanne
Hunter, T	Hunter, T.W.	Hunter, Vic	Hunter, Zoe	Huntington, Samuel	Huntington, Stephanie
Huntley, Cheryl	Hunton, Beate	Huntoon, Kristin	Huot, Zuzonna	Hupp, Melinda	Huq, Rehana
Hurd, Janet	Hurd, Lynne	Hurlburt, Richard	Hurlburt, Stephanie	Hurlbut, Elizabeth	Hurlbut, Kelly
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Hurst, Julia	Hurst, Laura	Hurt, James	Hurt, Robin	Hurtado, Robert	Hurtt, Kimberly

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Hutchings, Wes	Hutchings, William	Hutchins, Colleen	Hutchins, Katherine	Hutchins, Kathleen	Hutchinson, Carmen
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Hyde, Margaret	Hyde, Wade	Hydeman, Jinx	Hydro, Mary	Hyer, Judy	Hyett, Catherine
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Iavarone, Maria	Ibabao, Poppy	Ibarra, Arturo	Ibarra, Isabel	Ibis, Richard	Ibur, Patty
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Ilgner, Kristina	Iliff, Catherine	Ill Isms, Roge	Illert, Walter Paul	Illg, Gordon	Illg, Michelle
Illicete, Jamie	Ilsen, Eve	Iltis, Michael	Iluna, Mana	Ilyin, Alexander	Imada, Randall
Image, Sweet	Imbarrato, Julia	Imberton, Marie-france	Imbrogno, Jacquelyn	Imhoff, Debbie	Imhoff, Sandy
Imhoff, William	Imholte, Rachel	Immasche, Sonia	Immergut, Denny	Impila, Tim	Imus, Antoinette
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Iranzo, Vicente	Irby, Drew	Irby, Jim	Irby, John	Ireland, Barbara	Ireland, Dennis
Ireland, Ilona	Ireland, Jamie	Ireland, Victoria	Iriarte, Diana	Iribarne, Matthew	Irish, Terry
Irrgang, Marylyn	Irvin, Patricia	Irvin, Yvonne	Irvine, Eve	Irvine, Sharon	Irving, Christina
Irving, Mark	Irving, Marscha	Irwin, Deborah	Irwin, Jeff	Irwin, John	Irwin, John W
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Israel, Joann	Israel, Rose	Israels, Travis	Issa, Roxanna	Italiano, Corinne	Itenge, Anna
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Jackman, Jean	Jacks, Joan	Jackson, Alicia	Jackson, Alyssa	Jackson, Anne	Jackson, Avondus A .
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Jackson, David	Jackson, David	Jackson, Denise	Jackson, Dorothy	Jackson, Emma	Jackson, Evan
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Jackson, Joan	Jackson, Joy	Jackson, Joyce	Jackson, Judy	Jackson, Karen	Jackson, Kari
Jackson, Kathleen	Jackson, Kenneth	Jackson, Kris	Jackson, Michael	Jackson, Molly	Jackson, N
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Jackson, William	Jackubowski, Jonathan	Jacob, April	Jacob, Janet	Jacob, Jill	Jacob, Lynn
Jacobel, Richard	Jacobs, Barbara	Jacobs, Kristina	Jacobs, Len	Jacobs, Nathan	Jacobs, Norma
Jacobs, Patricia	Jacobs, Patrick	Jacobs, Quida	Jacobs, Renee	Jacobsen, Betty	Jacobsen, Brad
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Jacobson, Susan	Jacoby, Sharon	Jacoby, Susan	Jacques, Casey	Jacques, Karen	Jacques, Kathleen
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James, Minneana	James, Nancy	James, Robert	James, Russell	James, Sarah	James, Susan
James, Suzanne	Jameson, Linda	Jammal, Anthony	Jamvold, Shunko	Janakiraman, Anna	Janas, Frank
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Jankowski, Frances	Jankowski, Steven	Jannini, Mike	Janoe, Leslie	Janowitzprice, Beverly	Janquart, Laurence
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Jardon, Travis	Jarmuth, Sandra	Jarnstedt, Natalie	Jarosh, Jana	Jarrell, Jessica	Jarvie, Pam
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Jason, Regina	Jasper, Alan	Jasper, Tom	Jasphy, Renette	Jastromb, Virginia	Jaszczak, Patty
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Jeanne, Allana	Jeckell, Joyce	Jedlicka, Pavel	Jeeva, Aisha	Jefferson, Don	Jefferson, Thomas
Jeffery, Mary Jane	Jeffreys, D	Jeffries, Linda	Jeffries, Matt	Jefson, Alex	Jegen, Cole
Jeggo, Steve	Jegou, Julien	Jehn, Robert	Jelich, Betty	Jena, Alice	Jenkins, Charles
Jenkins, Dale	Jenkins, Derrick	Jenkins, J	Jenkins, Jane	Jenkins, Janell	Jenkins, Jeffrey
Jenkins, John	Jenkins, Ken	Jenkins, Kimberly	Jenkins, Lori	Jenkins, Matthew	Jenkins, Pam
Jenkins, Shelton	Jenkins, Susan	Jenkins, Sydney	Jenkinson, Lynn	Jenks, Jean	Jenne, Deanna
Jennings Sr, Franklin	Jennings, Beverly	Jennings, Carol	Jennings, Denise	Jennings, Scott	Jenrette, Henrietta
Jensen, Chris	Jensen, Cindy	Jensen, Cornelia	Jensen, Dan	Jensen, Gairda	Jensen, Gregory
Jensen, Jennie	Jensen, Joergen	Jensen, Julie	Jensen, Karen	Jensen, Kathy	Jensen, Lawrence
Jensen, Lorrie	Jensen, Louetta	Jensen, Marilyn	Jensen, Richard	Jerden, ED	Jerden, Scott
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Jerz, Alan	Jeschke, Herbert	Jeschofnig, Linda	Jesse, Chuck	Jessee, Judy	Jessey, Tyra
Jessiman, Kyle	Jessop, Darshan	Jessup, Michael	Jester, Lisa	Jeter, Mary	Jeter, Randal
Jewell, Kara	Jewell, Roe	Jewett, Heather	Jewkes, Rosemary	Jimenez, Carmen	Jinishian, Lucy
Jiranek, Pamela	Jirik, Paulissa	Jirik, Rita	Jishi, Mazen	Joadwine, John A	Job, Monk
Job, Tabatura	Jobe, Laura	Jobe, Susan	Jobling, Michael	Jochim, Angelica	Jochum, Jill
Jochums, Robert	Joe, Just	Joe, Vernon	Joel, Gregory	Joffe, Wendy	Johansen, Nicholas
Johansson, Celeste	John, Leland	Johns, Barbara	Johns, Stefania	Johnsen Commerce, Mark	Johnsen, Kenneth
Johnsen, Wallice	Johnson Iii, Hezikiah	Johnson, Alexandra	Johnson, Alvin	Johnson, Angela	Johnson, Ann
Johnson, Ashlee	Johnson, Barbara	Johnson, Barry	Johnson, Ben	Johnson, Bettemae	Johnson, Blair
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Johnson, Diane	Johnson, Don	Johnson, Dontae	Johnson, E	Johnson, Ellen	Johnson, Erik
Johnson, Gary	Johnson, Gregg	Johnson, Gregory	Johnson, Heather	Johnson, Jacob	Johnson, Jacqueline
Johnson, James	Johnson, James	Johnson, Janet	Johnson, Janice	Johnson, Jean	Johnson, Jeannine
Johnson, Jed	Johnson, Jennifer	Johnson, Jennifer	Johnson, Jennifer	Johnson, Jennifer	Johnson, Jodi
Johnson, Joel	Johnson, Joi	Johnson, Jona	Johnson, Joyce	Johnson, Judith	Johnson, Judy
Johnson, Julianna	Johnson, Karen	Johnson, Karen	Johnson, Karen	Johnson, Karen	Johnson, Karen
Johnson, Karl	Johnson, Katherine	Johnson, Katherine E.	Johnson, Kathryn	Johnson, Kathy	Johnson, Katie
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Johnson, Leslie	Johnson, Lilli	Johnson, Lily	Johnson, Linda	Johnson, Linda	Johnson, Linda
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Johnson, Mark	Johnson, Mary	Johnson, Maxine	Johnson, Michael	Johnson, Michael	Johnson, Michael
Johnson, Miranda	Johnson, Pamela	Johnson, Pat	Johnson, Patrice	Johnson, Patricia	Johnson, Paul
Johnson, Paula	Johnson, Peter	Johnson, Peter	Johnson, Peter E	Johnson, Philip	Johnson, Phyllis
Johnson, Qayyum	Johnson, Randall	Johnson, Rebecca	Johnson, Rhonda	Johnson, Richard	Johnson, Richard
Johnson, Richard	Johnson, Richard	Johnson, Rita	Johnson, Robert	Johnson, Roxy	Johnson, Russell

Johnson, Sage	Johnson, Samantha	Johnson, Sandy	Johnson, Sandy	Johnson, Savanna	Johnson, Shannan
Johnson, Sharon	Johnson, Sharon	Johnson, Shawn	Johnson, Sheilla	Johnson, Shirley	Johnson, Sierre
Johnson, Stefanie	Johnson, Steven	Johnson, Terrance	Johnson, Terry	Johnson, Theresa	Johnson, Tom
Johnson, Tom	Johnson, Tracy	Johnson, Vivian	Johnson, William	Johnson, Yvonne	Johnston, Allan
Johnston, Bud	Johnston, Chad D	Johnston, Dorothy	Johnston, Janet	Johnston, Kirsten	Johnston, Megan
Johnston, Nancy	Johnston, Nancy	Johnston, Philip	Johnston, Steve	Johnston, Susan	Johnston, Tori
Johnston, Virginia	Johnstonfarrington, Rena	Johnstonwalsh, Jessica	Jolicoeur, Susan	Jolley, Dee	Jolley, Renita
Jolls, Wendy	Jolly, Brad	Jolly-van Bodegraven, Mark	Jonas, Mindy	Joncus, Andrew	Jones Hamson, Nancy
Jones Jones, Billy	Jones Radford, Allycia	Jones, Aaron	Jones, AL	Jones, Allison	Jones, Annamarie
Jones, Anne	Jones, Ashlee	Jones, Betti	Jones, Bill	Jones, Bob	Jones, Brian
Jones, Brian	Jones, Brian	Jones, Brian	Jones, Carol	Jones, Carole	Jones, Catherine
Jones, Chris	Jones, Christine	Jones, Christopher	Jones, Clayton	Jones, Dana	Jones, Daniel
Jones, Daniel	Jones, Denise	Jones, Donald	Jones, Dorothy	Jones, Dr.virginia	Jones, Edith
Jones, Emma	Jones, Emmaline	Jones, Eric	Jones, Eric	Jones, Eugene	Jones, Gary
Jones, Ingrid	Jones, Jacqueline	Jones, James	Jones, Jan	Jones, Jason	Jones, Jenifer
Jones, Joel	Jones, Joyce	Jones, Julianne	Jones, Karen	Jones, Karen	Jones, Kathy
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Jones, Lorraine	Jones, Lynne	Jones, Maren	Jones, Mary	Jones, Mary	Jones, Maryn
Jones, Matt	Jones, Maureen	Jones, Meredith	Jones, Michelle	Jones, Mickie	Jones, Mitzi
Jones, Nancy	Jones, Pamela	Jones, Patricia	Jones, Penny	Jones, Raquel	Jones, Reg
Jones, Rev. Allan B.	Jones, Richard	Jones, Robert	Jones, Robert	Jones, Robin	Jones, Ronald
Jones, Sallymarie	Jones, Sandra L.	Jones, Stephanie	Jones, Sydney	Jones, Taylor	Jones, Terri
Jones, Thomas	Jones, Tim	Jones, Tod	Jones, Tony	Jones, Tony	Jones, Troy
Jones-bedel, Laura	Jonesbyrne, Stephanie	Jongsma, Kathy	Jonu, AL	Jordan, Audrey	Jordan, Daniel
Jordan, David	Jordan, James	Jordan, James And Genev	Jordan, Kathy	Jordan, Lois	Jordan, Marilyn
Jordan, Mark	Jordan, Mark	Jordan, Robert	Jordan, Rosalie	Jordan, Sue	Jordan, Susan
Jordan, Thayer	Jordan-guzman, Rosa	Jordanmaree, Kersten	Jorge, Sergio	Jorgensen, Ashlie	Jorgensen, Jean
Jorgensen, Lesley	Jorgenson, Annlouise	Jorgenson, Jerry	Jose, Francisco	Josefson, James	Joseph, Andrew
Joseph, Ann	Joseph, Anthony	Joseph, Ellen	Joseph, Jenelle	Joseph, John	Joseph, Pamela
Joseph, Robert	Josephson, Stephen	Joslin, Mary	Josselin, Christine	Jostad, Cathleen	Joy, Christina
Joy, Graham	Joy, Krista	Joy, Mark	Joy, Veda	Joyce, Eleanor	Joyce, Peter
Joyner, Jerry	Joyner, Joe	Joyner, Marjorie	Joyner, Stephanie	Jozwiak, George	Jozwiak, Mary
Juan, Jesse	Juarez, Adrian	Juarez, Nersy	Juch, Holly	Judd, Kimberly	Judd, Patricia
Judd, Schuyler	Judd, Thomas	Jude, Roxane	Judge, Barbara	Judith, Olson	Judson, Ann Marie
Judson, Connie	Judy, Angela	Juhl, Esther	Julian, Cecil	Julian, Lucy	Juliar, Jeff
Julien, Susan	Julieta, Gabriela	Jumonville, J	Jump, Robert	Jumper, Betsy	June, Taylor
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Juran, Kathleen	Jureller, John	Juric, Eileen	Juroff, Daniel	Just, Leslie	Just, Lin
Justice, Cynthia	Justice, Frederick	Justice, Jessica	Justice, Kevin	Justice, Pamela	Justiceswanson, Karen
Justin, Randi	Juzi, Adele	K, Allison	K, Ann	K, Anna	K, C
K, Charlotte	K, Dolores	K, Hitomi	K, J	K, J	K, John
K, Kate	K, R	K, Shelly	K, Susan	K, Taryn	K., Camilla
K., Matthew	K., Michele & David	Kabani, Fayaz	Kabanov, Vicki	Kabernagel, Laura	Kabitsch, Eileen
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Kalinowski, Mary	Kalinowski, Michael	Kalinski, Ray	Kalish, Diana	Kalka, Paul	Kallechey, David
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Karnatz, Robin	Karneth, Tom	Karns, Linda	Karonen, Annukka	Karp, Cyndi	Karp, Diane
Karp, Eleanor	Karp, Erin	Karp, Robin	Karpeh, Martina	Karpel, Ruth	Karpov, Clarinda
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Kasparian, Armen	Kaspark, Craig	Kasper, Alexa	Kass, Bronte	Kass, Peggy	Kassam, Nick
Kassoff, Jason	Kast, Gigi	Kastner, Margean	Kastner, Stephanie	Kasvinsky, Robert	Katayama, Miles
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Katzen, Doris	Katzen, James	Katzenberg, Barbara	Katzman, Annie	Katzman, Joshua	Katzoff, Allen
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Kaufman, David	Kaufman, Goldie	Kaufman, Joel	Kaufman, Julie	Kaufman, Melanie	Kaufman, Mike
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Kavanagh, Deborah	Kavanagh, John	Kavanagh, William	Kavanaugh, Kay	Kavars, Dain	Kavelman, Pamela
Kawananakoa, Haunani V.	Kay, Adam	Kay, John	Kay, Linda	Kay, Malcolm	Kay, Regina
Kaye, Paul	Kaye, Rosalie	Kaye, Sheila	Kaye-carr, Josh	Kayne, Abraham	Kays, Eleanor
Kaywin, Emma	Kazak, Ilene	Kazakevich, Victor	Kazakov, Valery	Kazlowski, Barbara	Kazmi, Anjum
Kazmierski, Rhonda	Kealhofer, Robert	Kean, Kim	Kean, Martha	Keane, Mandy	Keane, Mary
Keane, Ryan	Kearney, Catherine Lynne	Kearney, Lisa	Kearney, Mary	Kearney, Stephanie	Kearns, Carol
Kearns, Eileen	Kearns, Linda	Kearns, Meredith	Kearns, Patric	Kearns, Renita	Keasbey, Edie
Keating, C	Keating, F	Keating, Thomas	Keatingsecular, Karen	Keats, James	Keatts, Susan
Keawe, Dana	Keay, Pete	Keck, Brian	Keck, Calista	Keck, Carol	Kedderis, Pamela
Kednay, Sandy	Kedzie, M	Kee, William	Keefe, Patricia	Keefe, Patricia	Keefer, Donna
Keefer, Richard	Keefer, Tiffany	Keegan, Brian	Keehnen, Anne	Keeler, Kathleen	Keeler, Timothy
Keeley, Brigid	Keeley, James	Keeley, Martin	Keeling, Raymond	Keen, Ralph	Keenan, Robert
Keence, David	Keene, Kevin	Keene, Patrick	Keener, Lora	Keener, Pat	Keener, Stephen
Keeney, Karen	Keepers, Sharon	Keesey, Desn	Keesey, James	Keeting, Willaim	Keevey, Tom
Kefauver, Leslie	Keffer, Michael	Kehas, Alethea	Kehew, Linda	Kehl, David	Kehl, Janit
Kehoe, Andrea	Kehoe, Angela	Keil, Mary	Keim, Robert	Keirns, Ann	Keiser, Gail
Keiser, John	Keiser, Patrick	Keiser, Peter	Keiser, Robert	Keiter, Carol	Keith, Christine
Keith, JL	Keith, Lindsay	Keith, Nancy	Keithler, Mary	Keith-singleton, Melinda	Keitz, Heidi
Keleti, Steven	Kelleher, Donna	Kellems, JO	Keller, Ashley	Keller, John	Keller, Kathy
Keller, Martin	Kellerman, Debra	Kellermann, Paul	Kellermann, Thomasin	Kellermeyer, John	Kelley, Frances
Kelley, John	Kelley, Joseph	Kelley, Karen	Kelley, Karen	Kelley, Kate	Kelley, Kathy
Kelley, Kristi	Kelley, Lili	Kelley, Lynn	Kelley, Margaret	Kelley, Sharon	Kelley, William
Kellman, Steven G.	Kellogg, Jill	Kellogg, Thomas	Kelly, Brian	Kelly, Carolyn	Kelly, Crayton
Kelly, Deborah	Kelly, Diane	Kelly, Doris	Kelly, Edith	Kelly, Elizabeth	Kelly, Erin

Kelly, Gordon	Kelly, Grace	Kelly, Joel	Kelly, John	Kelly, Karen	Kelly, Katherine
Kelly, Lisa Ann & Family	Kelly, Lynn	Kelly, Margaret	Kelly, Mary	Kelly, Mike	Kelly, Mike
Kelly, Nancy	Kelly, Patrick	Kelly, Patrick	Kelly, Philip	Kelly, Ralph	Kelly, Rev. J. Patrick
Kelly, Sharon	Kelly, Terry	Kelly, Theresa	Kelly, Theresa	Kelly, Theresa	Kelly, Tim
Kelly, Vasiliki	Kelly, William	Kelly-banks, Patricia	Kelm, Kasey	Kelman, Barry	Kelnhofer, Russell
Kelso, Gertrude	Kelson, Barbara	Kemp, Ballinger	Kemp, John	Kemp, Kathleen	Kemp, Kindy
Kemper, Alex	Kemper, Bonnie	Kemper, Caroline	Kemper, Michael	Kempf, Victoria	Kempf, William
Kemphues, Marlana	Kempinsky, Jules	Kemple, Jason	Kempson, Diane	Kempson, Susan G	Kendall, Carolyn
Kendall, Gregory	Kendall, Joanne	Kendall, Martha	Kendall-rozman, Joan	Kendrick, Ann Marie	Kendrick, Betty
Kendrick, David	Kendrick, Missy	Kendy, Arthur	Keneally, Rachel	Kenig, Elezar	Kenion, Lisa
Keniski, Jane-elizabeth	Kenison, Gayle	Kenley, BG	Kennady, Karen	Kennard, Elizabeth	Kennedy, Alan & Miriam
Kennedy, Angela	Kennedy, Ann	Kennedy, Bryan	Kennedy, Carol	Kennedy, Charlotte	Kennedy, Colleen
Kennedy, Cory	Kennedy, Deborah	Kennedy, Devon	Kennedy, Dusty	Kennedy, Elisa	Kennedy, Elissa
Kennedy, Gena	Kennedy, Holly	Kennedy, Joan	Kennedy, John	Kennedy, Josh	Kennedy, Karen
Kennedy, Kevin	Kennedy, Kyle	Kennedy, Kyle	Kennedy, Mark	Kennedy, Mark	Kennedy, Patrick
Kennedy, Robert	Kennedy, Sarah	Kennedy, Tom	Kennedy, William	Kennen, Dale	Kenner, Emy
Kenney, Bradford	Kenney, Edward	Kenney, Marj	Kenney, Richard	Kennie, Steven	Kennnedy, Rourke
Kenny, Bonnie	Kenny, Brendan	Kenny, John	Kenny, Mark & Toni	Kenny, Michael	Kenny, Pamela
Kent, Cynthia	Kent, Ellen	Kent, Gwynneth	Kent, Ian	Kent, John	Kent, Joyce
Kent, Patty	Kent, Paul	Kent, Sharon	Kent, Steve	Kent, Thomas	Kentfield, Maren
Kenthack, Sharon	Kenton, Mike	Kenworthy, Rosalind	Keough, Barbara	Kepes, Lorna	Kepic, L
Kepner, Jane	Kepp, Elizabeth	Keppelman, Carlton	Keppler, Dustin	Kerbaugh, Ben	Kerbyson, Gerry
Kercher, John	Kerensky, Marcia	Kerkhoff, Barbara	Kerler, Philip	Kerley Long, Diane	Kerman, Paul
Kerman, Paul	Kern, Carol	Kern, Lisa	Kern, Will	Kernehan, Karl	Kerner, Dawn
Kerner, Jack	Kernicky, Jim	Kerns, Loretta	Kerns, Wesley	Kerr, Heather	Kerr, James
Kerr, Jan	Kerr, Judi	Kerr, Peter	Kerr, Shari	Kerr, Zachary	Kerrigan, Martin
Kerstein, Harvey	Kersting, Pamela	Kerwin, Maureen	Kerzner, Deborah	Kesich, John	Keske, Kathleen
Kesler, Paul	Kessinger, Jerry	Kessler, Anne	Kessler, Carol	Kessler, Maurice	Kessler, Phd, Bernard
Kessler, Randy	Kessler, Robert	Kessler, Robin	Kessner, Jacob	Kester, Lenore	Kester, Miriam
Kestrel, Cindi	Ketcher, Amery	Ketchum, G	Keto, Dorothy	Ketrick, Elizabeth	Kettell, Meg
Ketterer, Marcia	Keuchen, Lisa	Keuthan, Aliyah	Kevany, Michael & Kathryn	Kevelin, Nancy	Kewatt, Lindy
Key, Laurence	Key, Leslie	Keyes, Jack	Keylin, Margaret	Keys, Elsie	Keyser, Barbara
Keyser, Donald	Khalil, Mary	Khalsa, Cindy	Khalsa, Hari Rai	Khalsa, Nirbhao	Khambholja, Ann
Khan, Kerstin	Khan, Khalil	Khan, Rani	Khan, Zohal	Khlinovski Rockhill, Lawrence	Khoram, Maryam
Khoubesser, Steven	Khristoforov, Mylee	Kibbel, Kathi	Kibbie, Kathy	Kibler, JK	Kidd, Chris
Kidd, John	Kidney, J. Chris	Kidwell, Christopher	Kiedis, Denise	Kieffer, Ramsay	Kiefner, Joe
Kiel, Carolyn	Kiel, Kendall	Kiel, Zrinka	Kiely, Lavive	Kiener, Tara	Kiernan, Barbara
Kiernan, Elizabeth	Kiernan, Phoenix	Kiesling, Jon	Kifer, Robert	Kiholm, Laura	Kijewski, Kenneth
Kikukawa, Marion	Kilbon, Shelley	Kilcommons, Mary	Kilcullen, Sigrid	Kilduff, Cara	Kilgour, Jeanie
Killebrew, Ann	Killeen, Agoya	Killingsworth, Tommy	Killion, Sofia	Killmar, Karen	Kilpatrick, Dianne
Kil'urden, Ril'riia	Kim, Anna	Kim, Earl	Kim, Eunice	Kim, Jeanette	Kim, Kay
Kim, Lisa	Kimball, Joan	Kimber, Dave	Kimber, Greg	Kimbler, Elaine	Kimbro, Robert
Kimbrough, Ellen	Kimes, Andrea	Kimmel, Kevin	Kimmel, Linda	Kimmerle, Glenn	Kinder, Brad
Kindfield, Ann	Kindlmann, Marcia	King, Ann	King, Ben	King, Bill	King, Christen
King, Christine	King, Cyn	King, Cynthia	King, Darlene	King, David	King, David
King, Deborah C	King, Fawn	King, Gabrielle	King, Gail	King, George	King, Heidi
King, Jaleila	King, James	King, Jean	King, Joshua	King, Judith	King, Judy
King, Kathleen	King, Kathy	King, Kelly	King, Kevin	King, Laurie	King, Laurie & Dave
King, Lisa	King, M	King, Marjorie	King, Marsha	King, Paul	King, Ron
King, Roy	King, Ryan	King, Serina	King, Sherry	King, Susan	King, Theodore
King, Tonya	King-chuparkoff, Cathy	Kingsbury, Velma	Kingsley, Lisa	Kingsley, Wilder	Kingston, Nancy
Kinlaw, Patty	Kinley, Alyssa	Kinnaman, M.A.	Kinnamon, Jessica	Kinney, Douglas	Kinney, Jean
Kinney, Kate	Kinney, Ronnie	Kinnick, David	Kinnings, Laurie	Kinsella, Timothy	Kinser, Sue
Kinsey, Chetan	Kinsey, Heidi	Kinsey, James	Kinsinger, Barbara	Kinsman, James	Kintzley, Raymond

Kinzie, Joel	Kinzler, Kevin	Kipers, Lisa	Kipling, Caroline	Kipnes, Linda	Kipp, Gerald
Kiralis, Jeff	Kirby, Claire	Kirby, J	Kirby, Judy	Kirby, Kristin	Kirby, Linda
Kirby, Suzanne	Kirchdoerfer, Karen	Kircher, Sonia	Kirk, Brandon	Kirk, Carol	Kirk, Daniel
Kirk, Jean	Kirk, Lorraine	Kirk, Mary	Kirk, Nancy Jo	Kirk, S	Kirk, Stephanie
Kirkconnell, Leslee	Kirkham, Connie	Kirkpatrick, Gabriel	Kirkpatrick, Jim	Kirkwood, Tina	Kirley, Kathleen
Kirmeier, Pamela	Kirmse, Katie	Kirsch, Linda	Kirsch, Marilyn	Kirsh, Julie	Kirshbaum, Adrienne
Kirshner, Susan	Kirst, Ariel	Kirtis, Sukran	Kirtley, Mary	Kirton, Laura	Kirton, Michelle
Kiser, Kevin	Kisling, Lori	Kislockiii, Stephen F.	Kiss, Carolyn	Kisskemenczy, Magdalena	Kistner, Carrie
Kitamata, Craig	Kitay, Lawrence	Kitchen, Erica	Kitchen, Michael	Kitchen, Rowena	Kite, Richard
Kittell, Koko	Kittelson, Laurie	Kittredege, Elaine	Kittredge, Dan	Kitzinger, Dianna	Kitzinger, Jana
Kiwacz, Leslie	Kjono, Pamela	Kjorlie, Seagren	Kkillough, Elizabeth	Klafta, Kevin	Klales, George
Klammer And Reese, Avi And Clarence	Klapperich, Hunter	Klapsic, Maja	Klar, Agnes	Klasey, Janet	Klass, Naomi
Klassen, David	Klatt, Cheryl	Klauda, Harry	Klausing, Michael	Klawitter, Deborah	Klee, Eugene
Klehm, Christian	Klein, Bill	Klein, Daniel	Klein, Debra	Klein, Jeff	Klein, Joseph
Klein, Karen	Klein, Laura	Klein, Linda	Klein, Lisa	Klein, M	Klein, Marypat
Klein, Monte	Klein, Phil	Klein, Randi	Klein, Sabra	Klein, Susan	Kleinbach, Mary
Kleinbart, Melissa	Kleinlein, Jeff	Kleintank, Theresa	Kleist-corwin, Julaina	Klement, Shalva	Klemme Eliceiri, Rebecca
Klemme, Norma	Klempin, Serena	Klenner, Kevin	Klepadlo, Clarice	Klepek, Lisa	Klerer, Leona
Klessen, Helga	Klezmer, Lois	Kliban Bixby, Judith	Klick, Jay And Sandra	Klima, John	Klimchynskaya, Anastasia
Klimek, Ewelina	Klimovitz, Joseph	Klina, Laura	Kline, Carole	Kline, Carrie	Kline, Daniel
Kline, Danny	Kline, Deanna	Kline, Patrick	Kling, Joanna	Kling, Ray	Klingston, Karen
Klinka, Bruce	Klinke, David	Klippenes, Fennec	Klitzke, Barbara	Kljuce, Maria	Klock, William
Kloehn, Julia	Kloepfer, Sharon	Kloepper, Ben	Klof, Susan	Kloos, Helmut	Klopsch, Deana M
Klos, Kris	Klosner, Marc And Jill	Klosner, Mary	Klotz, Holly	Klotz, Rose Marie	Klubek, Brian
Klueger, Sandra	Klug, Rachel	Klugiewicz, Mark	Klunder, Christine	Klusaritz, Thomas	Klutey, Laura
Knaack, Monica	Knaeble, Alan	Knapp, Bonita	Knapp, Christina	Knapp, Debra	Knapp, Virginia
Knappman, Tanya	Knauber, Nicole	Knauf, Brandy	Knecht, Jill	Knechtel, Caela	Knehans, Derek
Knellinger, Suzanne	Kneser, Christine	Knickerbocker, Deanna	Kniep, Mary	Knieriemen, Susan	Kniery, Rita
Knies, Susanne	Kniffin, Margaret	Knigge, William	Knight, Annie	Knight, Bobbie	Knight, Brooke
Knight, Candice	Knight, Chetana	Knight, David	Knight, Dick	Knight, George	Knight, Haven
Knight, Jennifer	Knight, Jonathan	Knight, Julia	Knight, Lynn	Knight, Megan	Knight, Sarah
Knight, Ted	Knightdonovan, Donna	Kniolek, Linda	Knipe, Joan	Knipp, Donna	Knipp, Lois
Knodle, Marjorie	Knoll, Kris	Knop, Charlene	Knop, J	Knopp, Kristeene	Knoppers, Sherry
Knouff, Judith	Knower, Bryan	Knowles, Maya	Knox, Van	Knudson, William	Knuhtsen, Camilla
Knutson, L	Knuttila, Joan	Kobayashi, Anne	Kobersmith, Kim	Kobin, Walter	Kobler, Linda
Kobylarz, Denise	Kocel, Mason	Kocet, Holly	Koch Fajardo, Lisa	Koch, Aaron	Koch, Alexandra
Koch, Bill	Koch, C	Koch, Christine	Koch, Connie	Koch, Joann	Koch, Peter
Koch, Veronica	Koch, Walter	Koche, Claudia	Kocher, Sharonk	Kochman, Jeffrey	Kochner, Marlene
Kochtimothy, Bridget	Kociela, Erin	Koconis, Erica	Kocoras, Peggy	Koda, Richard	Koeck, Diana
Koehl, Lisa	Koehler, Cheri	Koehler, Christine	Koehler, Dennis	Koehler, Francine	Koehler, James
Koel, Leonard	Koenig, Jeff	Koenigsdorf, Jill	Koeninger, Laura	Koepf, Gail	Koerber, Lucas
Koessel, Karl	Koester, Dawn	Koester, Martha	Koester, Ronn	Koesterradmann, Tanya	Kofler, Michelle
Kogan, Richelle	Koger, James	Kohanek, Maggie	Kohl, Dianea	Kohl, Florence	Kohl, Teresa
Kohler, Roger	Kohls, Carl	Kohn, Ericka	Kohn, Justin	Kohn, Michelle	Koho, Michelle
Koich, Debra	Koiv, Ulle	Koivisto, Ellen	Kojm, Sheila	Kokal, Kristin	Kokaly, Atheer
Kokkinen, Eila	Kokol, Steve	Kokolis, Karen	Kokosali, Katerina	Kolak, Paul	Kolar, Marilyn
Kolar, Meredith	Kolassa, Michael F.	Kolber-grebe, Dawn	Kolbus, Joshua	Kolek, Brian	Kolessar, Joan
Kolhek, Ted	Kollar, Austin	Kollasch, Michelle	Kollbach, Anja	Kollegger, Charles	Kollender, Anne
Kolodny, Joy	Kolovou, Anna	Kolter, Art	Komba, Michael	Komin, Tatyana	Komisarof, Jeff
Kommrusch, Richard	Kondeanr, Monica	Kondratieff, Joanne	Kondreck, Janine	Konsella, Clint	Kontney, Beverly
Koo, Rebecca	Koob, Diane	Koogler, Hillary	Koogler, Sharon	Koontz, Richard	Koopman, Wiebren
Koorsen, Philip	Kopala, Ruth	Kopcha, Mary	Kopec, Janet	Kopeck, Ashley	Koperczak, John

Koplos, Janet	Kopp, Isabel	Koppel, Sandra	Koppisch, Aaron	Koran, Jessica	Korba, Kris
Korbel, William	Koren, Margaret	Korich, Carol	Koritz, Mark	Korkes, Andrew	Korman, David
Kormanik, Kathy	Kormendi, George	Korn, Sandra	Kornbluh, Martin	Kornbluth, Georgia	Kornet, Christine
Kornfeld, Laurel	Kornrich, Bill	Kornstein, Nina	Korom, D	Korous, Lillian	Korpas, Tom
Korpics, Kevin	Korte, Sallie	Korthals, Sherry	Korupp, Susan	Korzuchin, Alexey	Kosack, Gloria
Kosanovich, Tad	Kosar, Rebecca	Kosec, Dawn	Kosek, Raphael	Koser, Carol	Koshoffer, John
Kosiek, Janet	Koski, Jane	Koslek, Terry	Kosnar Hartman, Nancy	Kosowicz, Aleks	Koss, Inna
Koss, Joyce	Kosse, Kate	Kosta, Miranda	Kosted, Emily	Kostenko, Joseph	Koster, Michael
Koster, Tom	Koster, Valerie	Kostis, Steven	Kostiuk, Terry	Kostruba, Gene	Kotarski, John
Kotch, Brant	Kotch, Jill	Kotiadis Hastings-onhudson,, Katherine	Kotinas, Dee	Kotowicz, Susan	Kotsis, Eleni
Kotzamanis, Joyce	Kouba, Melody	Kourda, Terry	Koutsakis, Rose	Kovacs, Jacqueline	Kovacs, Melanie
Kovalchuk, Alex	Kovar, Jo Ann	Kovar, Marie	Kovarik, Penny	Kovats, A.B.	Koven, Tom
Kover, SY	Kovich, Jenni	Kowal, Steve	Kowalchick, Kathy	Kowalchuk, Katie	Kowalczik, Kathryn
Kowalczyk, Joyce	Kowalczyk, Kimberly	Kowalewski, Shirley	Kowall, Donald	Kowalska, Marta	Kowalski, Chris
Kowalski, ED	Kowalski, Katharina	Kowing, Kerri	Kowsky, Maureen	Kowzan, Donna	Kozak, Brandon
Kozak, Jesse	Koziol, Carol	Koziol, Cathy	Koziol, David	Kozub, John	Kraber, Carol
Krach, Judy	Kracker, Kristine	Krader, Katherine	Kraemer, Axel	Kraemer, Denise	Kraft, Cherie
Kraft, Lauren-michelle	Kraft, Linda	Kragh, Jan	Kraimer, Rebecca	Krainman, Peggy	Kraisler, David
Krakauer, William	Krakower, Glenn	Krakowski, Michele	Kral, Bradford	Kral, Mary Belle	Krall, Michael
Kram, Ruth	Kramarck, John	Kramer, Caroline	Kramer, Gavin	Kramer, Georganne	Kramer, Ilene
Kramer, J.	Kramer, Joyce	Kramer, Julie	Kramer, Laura	Kramer, Lauren	Kramer, Patricia
Kramer, Richard	Kramer, William	Kranowski, Steven	Krapf, Deborah D	Krash, Kallyn	Krashes, Marilyn
Krasnoff, Joshua	Krasnovid, Marina	Kratt, Stephen	Kraus, Catherine	Kraus, Ellen	Kraus, Jo Anne
Krause, AL	Krause, Daniel	Krause, Doug	Krause, Karen	Krause, Kate	Krause, Lance
Krause, William	Krauskoff, Bonnie	Krauss, Jedidiah	Krauss, Paul	Krauss, Robert	Krausz, L
Kraut, Susan	Kravcov Malcolm, Karen	Kravitz, Jan	Kravitz, Jeff	Kravitz, Yvonne	Krawczyk, Janet
Krawiecki, Susan	Krawisz, Bruce	Kraynak, ED	Krchnavi, Kimala	Kreager, Anita	Krebill, Kerry
Krebs, Jim	Krebs, Kirk	Krebs, RM	Krebs, Robert	Krebs, Wolf	Kreda, Marjory
Kreibich, Susanne	Kreider, Douglas	Kreider, Janice	Kreil, Joanne	Kreiner, Dennis	Kreiner-smith, Jill
Kreitlow, Candace	Kreitz, Cynthia	Kreklow, Rebel	Krell, Elinore	Krell-bates, Diane	Kresse, Robert
Krevitz, Alex	Krewson, Caroline	Kribell, Gloria	Krichman, Barbara	Kriebel, Carolyn	Kriebel, Sally
Krieg, Bill	Kriescher, Kevin	Krikava, Martha	Krikorian, Linnell	Krikourian, Robert	Kringlen, Sarah
Kripke, Clarissa	Krishna Paruchuri, Rama	Krishnappa, Vivek	Kriss, Evan Jane	Kristensen, Alfred	Kristiani, Ari
Kritzman, Philip	Kriz, Zdenek	Krizan, Dennis	Kroeger, Steven	Kroeger-mappes, Joy	Kroehler, Corbett
Krogdahl, Paula	Krois, Madeleine	Krokowski, Stephen	Kroll, Jane	Kroll, Lois	Kroll, Myles
Krom, Linda	Kroner, Matt	Kroninger, Daedriana	Kroosz, Linda	Kropp, Nathan	Kross, Walter
Kroth, Bob	Krouchick, Jennifer	Kroupa, Brenda	Krouse, Mike	Krow, Jessica	Krstic, Gianna
Krucoff, Rachel	Krueger, David	Krueger, Deborah	Krueger, Keith	Krueger, Richard	Krueger, Robert
Krueger, Wayne	Kruger, Dee	Kruger, Diana	Kruger, Suzanne	Krugma, Charles L.	Krumdick, Kasuandra
Krumdick, Kurtis	Krumm, Paul	Krumov, Liz	Krumrein, John	Krumstok, Robert	Krupicka, Jane
Krupp, Martin	Kruschwitz, Vicki	Kruse, Gordon	Kruse, Pat	Krusienski, Brian	Krusinski, Tara
Kruszynski, Yasiu	Krutilek, Virginia	Kryah, Victoria	Krygowski, Richard	Kryshak, Walter	Krysinski, Brian
Ksczanowicz, Donna	Kshaya, Malisa	Ku, Michelle	Kubasko, Jan	Kubiak, Ted	Kubick, Linda
Kubik, Jerry	Kubosh, Irene	Kubota, Charleen	Kubzdela, Kashka	Kuckel, Charles	Kuczynski, Kathleen
Kuechle, Marcia	Kueffler, Dolores	Kuehler, Thomas	Kuehn, AL	Kuehn, David	Kuehn, Gary
Kuehnle, Linda	Kuenning, Janis	Kuestner, William	Kufeldt, Melissa	Kuhl, Teresa	Kuhlman, Joyce
Kuhlow, Carrol	Kuhn, Gary	Kuhn, Kerry	Kuhn, Mia	Kuhn, Richard	Kuhns, Lynne
Kuiper, Cygnus	Kujawa, Kevin	Kukkonen, Holly	Kukulski, Cristina	Kulakowski, Mary	Kulas, Cookie
Kulesza, Boguslaw	Kulesza, Marcin	Kulhanek, Scott	Kulik, R	Kulik, Tony	Kuljerich, Kevin
Kuljian, Robert	Kulkarni, Claudette	Kulo, Ken	Kulp, Jeff	Kumar, Keren	Kummer, Karen
Kuncl, Janet	Kunen, David	Kunisch, James	Kuntz, Jean	Kuntz, John	Kunz, James & Leslea
Kunz, Ken	Kuper, Kathleen	Kureishi, Anisa	Kurkowski, Gary	Kurland, Miriam	Kurokawa, M
Kursh, Elroy	Kurtz, Christy	Kurtz, Maya	Kurtz, Nancy	Kurtz, Pat	Kurtz, Virginia
Kuru, Brian	Kurz, Daniel	Kurz, Donald	Kurzius, Katherine	Kurzweil, Andrew	Kurzweil, Lloyd

Kusch, Kristie	Kuschel, Sandra	Kush, Pat	Kush, Steve	Kushelr, Marti	Kushner, Annedore
Kusiolek, Robert	Kuspiel, Thomas	Kussman, Catherine	Kutch, Ron	Kute, Susan	Kuter, Ann
Kuttner, C	Kutz, Susan	Kuzdeba, Elizabeth	Kuzet, Kim	Kuziel, Frank	Kuzma, Robert
Kvaas, Robert	Kvenvold, Kristopher	Kvet, Rosalind	Kwan, Faye	Kwasneski, Cathie	Kwass, Peter
Kwiecinski, Robert	Kwitt, Michael	Kyle, Robert	Kyle, Shawn	Kyoung, Min Jung	Kyper, John
Kyse, Barbara	Kysel, Paul	Kysor, Anita	L, Candace	L, Carla	L, E
L, Florence	L, Roseanne	L, Vince	L., Kristin	La Burt, Suzanne	La Croix, Mindy
La Fata, Lana	La Point, Peggy	La Pointe, Keith	La Roche, Monique	La Rue, Kathryn	La Serra, Stephen
La Viola, D.	La, Pra	Laase, Sandra	Labarge, Karen	Labb, Deborah	Labbe, Jennifer
Laber, Manaul	Laberta, Carolyn	Labes, Stephanie	Labey, Georgia	Labiosa, Eleanor	Labrador, Roxana
Labrecque, Cheryl	Labrie, Tina	Labuga, Earl	Laccone, Connie	Lacey, Susan	Lacher, Melva
Lachot, Magali	Lacker, Tiffany	Lackey, Juanita	Lackey, Mercedes	Lackie, Joan	Laclair, Gary
Laclaire, Joy	Lacognata, Dale	Lacombe, Judy	Lacroix, Dawn	Lacroix, Rev. Gary	Lacy, Mr.lynnward
Lacy, Sharon	Laddy, Brian	Lader, Melissa	Ladley, Peter	Laface, Karen	Lafaver Gleason, Barbara
Laffer, Denise	Laffey, Alice	Laflamme, Jeff	Lafleur, Donnette	Lafleur, Lydia	Lafleur, Madison
Lafleur, Martha	Lafleur, Todd	Lafond, David J	Lafour, Liz	Lafreniere, C.L.	Lafter, Mary
Lagatol, Mary	Lagos, Ben	Lagrone, Amy	Lahaie, Ann Marie	Lahart, Val	Lahey, Diana
Lahiff, Maureen	Lahman, Barbara	Lahna, Joyce	Lahorgue, Frank	Lahovitch, Mary	Lahovitch, Mary
Lai, A	Lai, Brenda	Lai, Carla	Lai, Jared	Laieski, Caleb	Lain, M.A.
Laine, Giovanna	Laine, Joyce	Laird, Mark	Laird, Wade	Lairson, Kimberly	Laity-snyder, Mark
Lake, Athena	Lake, Carolyn	Lake, Katherine	Lake, Keith	Lake, Scott	Lakey, Julia
Lakin, Charles	Lakoff, Cathy	Lakosil, Joanne	Lalanne, Jana	Laliberte, Marc	Lalley, Janice
Lally, Kelly	Lalond, Sharon	Lalumiere, Valerie	Lam, Ofelia	Lama, Stacey	Lamagaia, Yaygon
Lamagna, Leticia	Lamantia, J	Lamantia, Mindy	Lamarca, Dawn	Lamarre, Michael	Lamascus, Kristin
Lamb, Felicity	Lamb, Fran	Lamb, Frances E	Lamb, Jan	Lamb, Jim	Lamb, Joyce
Lamb, Kelly	Lamb, Leslie	Lamb, Margaret	Lamb, Richard	Lamb, Robert	Lambden, Corinne
Lambe, Jill	Lamberson, Tim	Lambert, Izabela	Lambert, Jim	Lambert, Kathryn	Lambert, R. Steven
Lambert, Roger	Lambert, Wendy J	Lamberti, Ryan	Lambeth, Jim	Lambeth, Larry	Lamb-wilson, Glenda
Lamer, Ann	Lammers, Richard/martha	Lamond, Camas	Lampe, HY	Lampe, Pam	Lampe, Raymond
Lamperti, John	Lampka, Joseph	Lamppert, Jeff	Lampson, John	Lanagan, Pamela	Lanahan, Fred
Lancaster, Donald	Lancaster, Jonel	Lance, Cindy	Lancia, Debra	Lancman, Deborah	Lancos, Rose
Lanctot, K	Land, Aisha	Land, David	Land, Karen	Landa, David	Lander, HB
Landers, Elizabeth	Landers, Mark	Landes, Joan	Landess, Michael	Landgrebe, Gary And Seraphina	Landherr, Lawrence
Landis, Dan	Landis, Jessica	Landis, Joann	Landis, Luella	Landman, Stefanie	Landon, Adrian
Landon, Julia	Landon, Lynne	Landron, Ana	Landrum, Margaret	Landry, Cheryl	Landry, Roger
Landy, Judith	Lane, Alexandriah	Lane, Andrew	Lane, Anold	Lane, Gerilyn	Lane, Jeanne
Lane, Kim	Lane, Liesl	Lane, Norman	Lane, Patricia	Lane, Sandra	Lan-eddy, Joyce
Lanesky, D	Laney, Anne-marie	Laney, Kate	Lang, David	Lang, Elliot	Lang, Jim
Lang, Joan	Lang, Katarina	Lang, Lynn	Lang, Lynn C.	Lang, Rachael	Lang, Scott
Lang, Sue	Langan, Barbara	Langbein, Lisa	Langdon, Angela	Lange, Constance	Lange, Damon
Lange, Gordon	Lange, Marlena	Lange, Theresa	Langeheinrich, Gertraud	Langelan, M.	Langele, Robert
Langenau, Douglas	Langer, Cassandra	Langer, Ira	Langer, Norbert	Langevin, John	Langfield, Jen
Langford, Jean	Langford, Lora	Langford, Sharon	Langhaeuser, Sigrid	Langham, Billy	Langham, Loraine
Langham, Sheri	Langlet, Wanda	Langley, Helen	Langley, Wayne	Langlois, Donna	Langmeyer, Bill
Langner, Belinda	Langrall, Alan	Langston, Michele	Langue, Joan	Langworthy, James	Lanham, Michael
Lanik, Lavona	Lankenau, Megan	Lankford, Lennie	Lann-clark, Erica	Lanning, Bill	Lanning, Bill
Lanoe, Regina	Lanoway, Asia	Lansinger, Gary	Lantto, Orville	Lantz, Bridget	Lantz, Yvette
Lanum, Glenn	Lanus, Howard	Lanz, Jean	Lanzetta, Linda	Lanzoni, Jane	Lapadula, Marco
Lapayover, Rabbi Alan	Lape, Sandra	Lapetino, Carol	Lapidus, Barbara	Laplante, Matt	Lapointe, Dave
Lapointe, Drena	Lapointe, Kenneth	Lapointe, Richard	Lapointe, Toni	Lapointe, Vincent	Laporta, Angela
Laporte, Candace	Laporte, Chris	Laporte, Ilana	Laporte, Mike	Lapp, Faye	Lappin, Leila
Laptad, Lisajo	Laramie, David	Lardieregrison, Darlene	Lardner, Terence	Larger, Amanda	Largmann, Merrie
Larimore, Reid	Lario, Rocio	Lark, Ian	Lark, Neil	Larkin, Charles	Larkin, Debbie
Larkin, Elizabeth	Larkin, Laura	Larkin, Loretta	Larkin, Timothy	Larkins, Lynn	Larky, Steven

Larocca Jr., Anthony -	Laros, Rebekah	Larosa, Myriam	Larrabee, Consuelo	Larrabee, Dick	Larrick, Margaret
Larrison, Elizabeth	Larrow, Peggy	Larsen Elms, Chandra	Larsen, Curtis	Larsen, David	Larsen, Debbie
Larsen, Dorothy	Larsen, Joanne	Larsen, Karen	Larsen, Larry	Larsen, Lisa	Larsen, Nadine
Larsen, Timothy	Larsen, Tom	Larson, Beth	Larson, Briggid	Larson, Christine	Larson, Colby
Larson, Diane	Larson, Frances	Larson, Garrett	Larson, Gary	Larson, Geoffrey	Larson, Grant
Larson, Janet	Larson, Melissa	Larson, Pat	Larson, Phedra	Larson, Steve	Larson, Wendy
Lartitegui, Andres	Larue, Erik	Larue, Jole	Larue, M	Lasahn, J	Lasek, Patricia
Lash, Cal	Lash, Geraldine	Lash, Mary	Laskasky, Cheryl	Lasko, Judith	Lasko, Rob
Lasko, Vanessa	Lasky, Eleanor	Lasorsa, Maria	Lassahn, Kathy	Lassandrello, Noreen	Laste, Melissa
Laster, Jr, Ira	Lastovka, Barbara	Lastrella, Carl	Lateiner, Ulysses	Latham, Janet	Latham, Roger
Lathrop, Norman	Lau, Mari	Laub, Craig	Lauber, Ellen	Laudeman, Paul	Lauder, David
Laudo, Annette	Laughlin, Dawn	Laughlin, Laurel	Laughtland, Josh	Laurel, Sandra	Lauren Desarbe, Michael
Laurence, Karen	Laurentfaesi, Stephan	Laurer, Beth	Lauria, Dan	Laurie, Annie	Lauritsen, Christina
Lauritzen, Savannah	Laurson, Edward	Lautner, Sharon	Laux, David	Lavassaur, J.M.	Lavaute, Judy
Lavelle, Joyce	Lavender, Deane	Laverdiere, Marc	Laveta, Tawnya	Lavin, Lucianne	Lavinder, Gary
Lavine, Aaron	Lavoie, Suzanne	Law, Leona	Law, Meya	Lawell, Julie	Lawford, Rhonda
Lawler, Elizabeth	Lawler, Emily	Lawler, Sandy	Lawler, Vedet	Lawler, William	Lawless, Kathy
Lawlor, Bonnie	Lawr, Pat	Lawrence Gilles, Penelope	Lawrence, Andrew	Lawrence, Bernard	Lawrence, David
Lawrence, Jack	Lawrence, Jaen	Lawrence, Katherine	Lawrence, Lenora	Lawrence, Maggie	Lawrence, Michael
Lawrence, Rosangela	Lawrence, Susan	Lawrence, Tara	Lawrencemiles, Cynthia	Laws, Miki	Lawson, Acacia
Lawson, Bart	Lawson, Bartley	Lawson, Ellen	Lawson, Guy	Lawson, Janet	Lawson, Joseph
Lawson, Leslie	Lawson, Pippa	Lawtie, Dia	Lawton, Catherine	Laxton, Ryan	Laya, Albert
Layden, Patricia	Layden, Renee	Layne, Megan	Lazar, Christine	Lazar, Jodi	Lazar, Magdolna
Lazaro, Kim	Lazarus, Sara	Lazarusreimen, Susan	Lazechko, Robert J.	Lazinsky, William	Lazio, Rochelle
Lazo, Onice	Le Baron, Nina	Le Beau, Josette	Le Coq, Lindy	Le Masson, Karen	Le Noir, Luc
Le, Luan	Le, Ronald	Le, Trung	Le, VY	Lea, Frank W	Lea, Serena
Lea-ballard, Cara	Leach, Megan	Leadbetter, Guy	Leahy, Katherine	Leahy, Susan	Leal-mcbride, Odilia
Leaming, Lisa	Leamy, Catherine	Lean, Mary Jane	Leaper, Mary Joy	Learned, J.	Leary, Kevin
Leary, Nicholaus	Lease, Anthony	Leatherwood, Fran	Leavitt, Claire	Leavitt, Mary C	Leavitt, Meaghan
Leavy, Jacqueline	Leban, EF	Lebeau, Barry	Lebegern, Brenda	Lebel, Doreen	Leber, Susan
Lebert, Mary	Lebid, Galina	Leblanc, Candy	Leblanc, Charlotte	Leblanc, Edward	Leblanc, Joe
Leblanc, Karla	Leblanc, Lisa	Lebolo, Annette	Lebon, Sharon	Lebow, Jeanne	Lebowitz, Jacob
Lebreton, Heru Paule	Lebron, Laraine	Leccese, Barbara	Leccese, Geralyn	Lechner, Becky	Lechner, Mary Ann
Lechowicz, Elaine	Leck, Mary	Leckliter, Linda	Leclair, Hansen	Leclair, Peg	Lecronier, Micki
Ledden, Dennis	Leddy, Linda	Lederman, Jessica	Ledesky, Michele	Ledford, Dena	Ledford, James
Leduc, John	Lee, Alex	Lee, Bernard	Lee, Brenda	Lee, Carol	Lee, Charles
Lee, Chimey	Lee, Christopher	Lee, Cindee	Lee, David	Lee, Deborah	Lee, Diana
Lee, Dylan	Lee, Gale	Lee, George	Lee, Gerry	Lee, Hyun	Lee, Jerry
Lee, Joe	Lee, Kate	Lee, Kathleen	Lee, Kemba	Lee, Kevin	Lee, L.
Lee, Laura	Lee, Madeleine	Lee, Marilyn	Lee, Mark	Lee, Michael	Lee, Michelle
Lee, Nella	Lee, Patricia	Lee, Peter	Lee, Ralf	Lee, Richard	Lee, Rick
Lee, Robin	Lee, Shannon	Lee, Sharon	Lee, Steven	Lee, Susan	Lee, Tammy
Lee, Thomas	Lee, Travis	Lee, Virginia Curtis	Lee, W Jeffrey	Lee, William	Leefe, Nancy
Lee-figueroa, Karyl	Leek, Bill	Leek, Katherine	Leeman, Cavin	Lees, Ruthann	Leesekamp, Kris
Leestma, Charlene	Lefebvre, Eugene	Lefever, Dimitri	Lefever, Yvonne	Leff, H.	Leffel, Jeannine
Lefler, Scott	Lefler, Susan	Lefsyk, Sara	Legardeur, Armand	Legaroff, Kyra	Leger, Myrna O.
Leggoe, Glen	Legner, Diane	Legsdin, Amanda	Legzdins, Albert	Leh, M.a., M.s.ed., Dean	Lehigh, Cynthia
Lehman, Bryn	Lehman, Chris	Lehman, Cynthia	Lehman, Mary	Lehman, Melissa	Lehmann, A
Lehmann-kim, Dina	Lehmanrittinger, Ann	Lehr, Dan	Lehr, Doris	Leibler, Leah	Leibler, Ron
Leibowitz, Susan	Leichliter, Mary	Leidig, Charles	Leidner, Vicki	Leifer, Leah	Leigh, Bonnie
Leigh, Lynda	Leigh, Tara	Leigh, Vera	Leighten, Patricia	Leighton, Betsey	Leighton, Tim
Leightontoth, Mindy	Lein, Kristin	Leisen, Don	Leiseroff, Miriam	Leiss, Fred	Leitch, Mary Ann
Leite, Fernanda	Leiter, Rebecca	Leithauser, David	Leivant, Natalie	Lejeune, Peggy	Leka, K.
Lekshe Tsomo, Karma	Leland, Laurie	Leland, Lora	Lellinger, J.	Lemay, Jeannine	Lembeck, Helen

Lembeck, James	Lemberg, Eric	Lemberg, Thomas	Lemieux, Suzanne	Lemkuil, Rita	Lemmie, Charmaine
Lemon, KA	Lemon, Michele	Lemon, Sheri	Lemos, Nora	Lemus, Diana	Lenarcic, Barbara
Lenard, Roberta	Lenas, Deloris	Lenchner, Nicholas	Lendick, Julie	Lengel, Elizabeth	Lengel, Ken
Lengel, Nancy	Lenkevich, Angie	Lenney, Marina	Lennon, Elizabeth	Lennon, Paul	Lennox, Kent
Lenox, Mary	Lensbower, Jessica	Lensch, Angela	Lenssen, Barbara	Lent, Howard	Lent, Patricia
Lenthall, Kate	Lentine, Maria	Lentini, Tony	Lentz, Robert	Lenz, Andrew	Leo, Evelyn
Leon, Benito	Leon, David	Leon, Deb	Leon, Elizabeth	Leon, Marilyn	Leon, Venta
Leonard, Billie	Leonard, Brian	Leonard, Cami	Leonard, Candie	Leonard, Esther	Leonard, Fred
Leonard, Grace	Leonard, Joan	Leonard, John	Leonard, Leonora	Leonard, Linda	Leonard, Monika
Leonard, Paul	Leonard, Sara	Leonard, Thomas	Leonard, Valerie	Leonardini, Barry	Leone, Gina
Leong, Mary	Leopold, James	Lepikko, Tanja	Leplatt, Betsy	Lepoer, Kathleen	Lepore, Deborah
Lepore, Gary	Lepore, Paula	Leppala, Maarit	Lepple, Christopher	Leppo, Bob	Leptich, Dave
Leque, Sally	Lequient, Magali	Lerda, Brandon	Lerma, Luis	Lerman, M	Lerner, Albert
Lerner, Barry	Lerner, Byron	Lerner, Lori	Lerner, Lorraine	Lerner, Murray	Lerner, Sara
Lerner, Shaina	Lerner, William	Leroy, Greg	Lervik, Tanya	Lesem, Ken	Lesko, Robert
Leslie, Jane	Leslie, Jean	Leslie, Lin	Leslie, Norman	Leslie, Ron	Leslie, Timothy
Leslie, Trevizo	Leslie, William	Lesnick, Helen	Lesperance, James	Less, David	Lessard, Mike
Lessie, Patricia	Lessnau Md, Klaus	Lesson, Lynne	Lester, Chris	Leszczynski, M	Letchworth, Debra
Letendre, Michael	Letendre, Scott	Letman, Dennis	Letourneau, Alice	Letourneau, Glenn	Letourneau, Pamela
Letsom, Barbara	Letusick Spear, Janet	Leung, Camille	Leung, Kiu	Leung, Lawrence	Leuschner, Horst
Leuthner Decker, Heide	Leva, Dana	Levasseur, Julie	Leveille, Tom	Leven, Marie	Levengood, Mark
Levensaler, Kurt	Leventer, Jerry	Leventis, Nick	Leveque, Paul	Lever, Michelle	Levesque, Amanda
Levesque, Andrew	Levesque, Andtea	Levi, Amy	Levi, Louis	Levidi, Eleni	Levier, Maureen
Levin, Cathy Elizabeth	Levin, Julie	Levin, Larry	Levin, Mark	Levin, Patricia	Levin, Perry
Levin, Shaun Marie	Levin, Susanna	Levine, Adam	Levine, Cathy	Levine, Clairemarie	Levine, Ellen
Levine, Gregg	Levine, Joel	Levine, Leonard	Levine, Murray	Levine, Nina	Levine, Rhoda
Levine, Sandy	Levine, Susan	Levins, Karen	Levinson, Elana	Levinson, Rebecca	Levinson, Todd
Levitsky, Howard	Levitt, Jeff	Levitt, Lacey	Levitt, Mary	Levitt, Michael	Levitt, Robert
Levkoff, JO	Levous, P.	Levy, Allan	Levy, Amber	Levy, Arthur	Levy, B
Levy, Claire	Levy, David	Levy, David	Levy, Gary	Levy, Janet	Levy, Kathleen
Levy, Klaus	Levy, Norm	Levy, Ray	Levy, Stephen	Levy-hara, Ivan	Levy-lyons, Ana
Lew, Marissa	Lewandowski, Michael	Lewandowski, Stacia	Lewandowski, Tim	Lewellen, Marjorie	Lewin, Peter
Lewis, Anasa	Lewis, Ashley	Lewis, Daniel	Lewis, David	Lewis, David	Lewis, Debra
Lewis, Don	Lewis, Erma	Lewis, Evelyn	Lewis, Grace	Lewis, Heather	Lewis, Jane
Lewis, Jennifer	Lewis, Karen	Lewis, Kathleen	Lewis, Kelli	Lewis, Kristine	Lewis, Larry
Lewis, Lisa	Lewis, Marjorie	Lewis, Rebecca	Lewis, Reid	Lewis, Rita	Lewis, Robert
Lewis, Samm	Lewis, Sammarye	Lewis, Sara	Lewis, Sharon	Lewis, Shawn	Lewis, Sherry
Lewis, Susan	Lewis, Thomas	Lewis, Thomas	Lewis, Verlene	Lewis, Wayne	Lewis, Wendy
Lewitas, Holly	Ley, Brian	Leyden, Terren	Leyendecker, Billie	Leyerle, Blake	Leysath, Bert
Leyva, Paul	Lezotte, Eric	Lhesli Benedict, J	L'heureux, Jessica	Lhotan, Carole	Li, Tony
Liang, Kris	Liao, Joanna	Libbares, Georgia	Libbey, Thomas	Libby, Dominic	Libby, Kathleen
Libengood, Patty	Liberge, Dusty	Libertini, Rosi	Libman, Diane	Licalsi, Carolyn	Licastri, Antonina
Lichtenstein, Dorothy	Lichterman, Ron	Lichtin, Ben	Lickteig, Joan	Lidard, Tim	Liddick, Shawn
Liddle, Bill	Liddle, K	Liddle, Lee	Lieb, Louise	Liebau, Michael	Lieber, Stephen
Lieberenz, David	Lieberman, Lucky	Lieberman, Michael	Liebert, Caren	Liebherr, Stephanie	Lieblein, Judy
Lieblein, Michael	Liebling, Daniella	Liebman, Amy	Lieder, Cecilia	Lieder, J. C.	Liedike, Robert
Liedlich, David	Liedlich, Nancy	Liesener, Judy	Lietka, Jennifer	Lieurance, Cynthia	Liew, Christina
Liggio, Kristine	Light, Gregory	Light, Julie	Lightbody, Kristen	Lightcap, Theresa	Liguori, Diane
Liken, Alyce	Likens, Jessica	Liles, Ben	Lilienfeld, Evelyn	Lilienkamp, Bryan	Lilith, Ms.
Lillard, Renee	Lilley, Andrew L.	Lilley, Sarah	Lillich, Anthony	Lilling, Glenda	Lillis-olson, Jane
Lilly, Evelyn	Lillywhite, Harvey	Lim, Kristina	Lim, Olivia	Lima, Larry	Limbach, John
Limperis, Stephen	Lin, Ching-yi	Lin, David	Lin, David	Lin, James	Lin, Kristi
Lin, Mary	Lin, Victoria	Linabury, Sandra	Linarez, Karen	Lincke, Joy	Lincoln, Barb
Lincoln, Deb	Lincoln, Margaret	Lincoln, Sara	Lind, Julie	Linda, Lauren	Lindberg, Marian
Lindeman, Craig	Lindemann, Aleksander	Lindemann, Kate	Lindemann, Roxanna	Linden, Joanne	Linden, Shay

Linden, Steven	Linden, Susan	Lindenfeld, Esther	Lindequist, Sue	Linder, Dana	Linder, Kay
Linder, Patty	Linder, Tami	Lindermayr, Maureen	Lindey, Claudine	Lindgren, Debra	Lindgren, Joan
Lindgren, Kristie	Lindhen, Sakari	Lindholm, Karen	Lindley, Kenton	Lindorff, Elizabeth	Lindquist, Cathy
Lindquist, Erin	Lindsay, Bill	Lindsay, Carla	Lindsay, Gary	Lindsay, Johanna	Lindsey, David
Lindsey, Emily	Lindsey, Judy	Lindsey, Katherine	Lindsey, Lee	Lindsly, Colin	Lindstrom, Karen
Lindvers, Brigitte	Linehan, Susan	Linerud, Tim	Lines, Barbara	Ling, Tracy	Lininger, Steve
Link, Carol Ann	Link, Mary	Link, Tom	Linke, Suzanne	Linkin, Vicki	Linkous, Amanda
Linn, Karen	Linnerson, Gail	Linscott, Carol	Linsky, David	Lint, Daniel	Lintner, Lawrence
Linton, Adrian	Linton, Annie	Linton, Beverly	Linton, Rhoda	Linvill, Michael	Linzer, Alan
Linzmeier, Robert	Lionello, Luca	Liotard, Marcia	Lipari, Don	Lipari, Philip	Lipchik, Elliot
Liper, Etti	Lipinski, Michael	Lipka, Erin	Lipka, Francine	Lipka, Nancy	Lipkind, Dds, Larry
Lipman, Deborah	Lippelt, Diane	Lippert, Amy	Lippert, Timothy	Lippincot, Caroline	Lippitz, Rhita
Lippner, Linda	Lipsig, Anna	Lipsky, Carol	Lipson, Alan	Lipton, Dave	Lipton, Judith
Lipton, Paul	Lipton, Richard	Liquori, Rose	Lira, Stefon	Lisi, Anna	Liska, Steve
Liss, Anita	Liss, Cynthia	Liss, Jean	Liss, Linda	Liss, Mary	Lister, Dolly
Liston, Guy	Lita, Isabelita	Litchfield, Dan	Lite, Elaine	Litten, Edna	Little Coyote, Brandon
Little, Alison	Little, Jerad	Little, Judith	Little, Wilbur	Littlefield, Caroline	Littlefield, Jim
Littlepage, Dean	Littmann, Bill	Littrell, Shannon	Litvak, Gale	Litwak, Maxine	Litwin, Jared
Litwin, Julie	Litwin, Ralph	Litz, Robert	Liu, Kris	Liu, Sue	Liverant Close, Hannah
Livingston, Elaine	Livingston, Linda	Livingston, Tawnee	Livingstone, Padme	Livote, Marilyn	Liz, Gessenia
Lizie, Mary E	Lizotte, Geoffrey	Lizza, Ralph	Ljunggren, Carla	Llerandi, Janet	Llewellyn, Birgit
Llewellyn, David	Llewellyn, David	Llinas, Stephanie	Lloyd, AA	Lloyd, Janet	Lloyd, Kelly
Lloyd, Steve	Lo, Jen	Lobanova, Katya	Lobelle, Jacquelyn	Loberg, Emily	Lobianco, Maryann
Lobo, Jorge	Lobuono, Joanne	Locascio, Leonard A	Locey, Delphi	Loch, Christopher	Loch, Jill
Lochner, Jan	Lockamy, Kelly	Lockard, Don	Locke, Stephen	Lockenacamulli, Lorraine	Locker, Georgia And John
Lockett, Loretta	Lockhart, Gail	Lockwood, Peter And Vicky	Lockwood, Sara	Loddengaard, Nancy	Loder, Madeline
Lodolo, Lucia	Loe, Peggy	Loeb, Martha	Loechner, Karen	Loeffelholz, Craig	Loeffler, Alexandra
Loeffler, Katja	Loehlein, Ken	Loehr, Cameron	Loera, Ann	Loesch, Edie	Loesche, Sandy
Loewen, Andrea	Loewenstein, Cathy	Loewer, Vera	Loewy, Cynthia	Lofgren, Gary.	Lofquist, Sandy
Loftin, Nancy	Loftis, Ryan	Lofton, Charles	Loftus, William	Lofurno, Susan	Logan, A J
Logan, Catherine	Logan, Joseph	Logan, Kerry	Logan, Lucy	Logan, Marilyn	Logan, Mary
Logan, Noelle	Logan, S	Logan, T	Logerquist, Kristin	Logg, Connie	Loggins Iii, Edward
Logsdon, Jimi	Logsdon, Kathryn	Logue, Lawrence	Lohman, Scott	Lohnes, Jonathan	Lohr, Krista
Lohrasebi, Niloufar	Lohse, Pamela	Lojak, Lori	Lokensgard, Amy	Lolli, Mark	Lomaka, Christine
Lomascolo, Suzanne	Lombard, Richard	Lombard, Stewart	Lombardi, Carolyn	Lombardi, Claire	Lombardi, L
Lombardi, Michael	Lombardo, Rebecca	Lombera, Sylvia	Lomheim, Chris	Lommel, Lois	Londe, Dr. Helen
London, David	London, Joy	Londowski, Jan	Loney, Sandy	Long Holland, Kathy	Long, Aaron
Long, Alan	Long, Andrew	Long, Ann	Long, Autumn	Long, Carrie	Long, Darwin
Long, Dave	Long, Deborah	Long, Donna	Long, Douglas	Long, Elaine	Long, Freddie
Long, Jamie	Long, Jerrold	Long, John	Long, Kristina	Long, Laura	Long, Lee
Long, Leeann	Long, Leland	Long, Linda	Long, Lorie	Long, Marilyn	Long, Mike
Long, Missy	Long, Nina	Long, Patricia	Long, Steve	Long, Suzanne	Long, Tom
Long, Toni	Long, William	Longacre, David	Longenbaugh, Dee	Longenbaugh, John	Longhini, Joanne
Longley, Richard	Long-lusk, Sandy	Longo, Frank	Longo, Jack	Longo, Stephanie	Longosky, Susan
Longworth, Carly	Longyear, Sharon	Lonsdale, Carol	Look, Lois	Loomer, Leanna	Loomis, Adam
Loomis, Carol	Loomis, Gregry	Loomis, Joann	Loomis, Mina	Looney, Hannah	Looney, Katherine
Looney, William	Loos, Elisabeth	Loosen, James Kevin	Loosmore, Lawrence	Loparco, Marie	Lopatin, Leonard
Lopedota, Sylvia	Loper, Dawn	Loper, Matthew	Lopes, Audrey	Lopes, Maureen	Lopes, Priscila
Lopez Jr, Mr Baldamar	Lopez, Blanca	Lopez, Carmen Alicia	Lopez, Celia	Lopez, Chris	Lopez, Chris
Lopez, Covi	Lopez, Edgar	Lopez, Gonzalo	Lopez, Jeremiah	Lopez, John	Lopez, Laura
Lopez, M	Lopez, Manuela	Lopez, Maria	Lopez, Maryann	Lopez, Monica	Lopez, Nancy & Tony
Lopez, Randy	Lopez, Reine	Lopez, Susan D.	Lopez-hagan, Nicole	Lopresti, Kathleen	Lopreto, Cynthia
Lorand, John	L'orange, April	Lorans, Isabelle	Lorch, William	Lord, Christopher	Lordi, Jeanine
Lordy, Cherie	Lore, Rebecca	Lorenz, Angie	Lorenz, Jennifer	Lorenz, Laird	Lorenz, Robyn
Lorenzen, Suzanne	Lorette, Len	Lorig, Constance	Loring, Kyle	Lorkiewicz, Candace	Lorraine, Hilary

Lorraine, Sheridan	Losasso, Dianne	Losee, Brian	Losman, Yvette	Lotak, Justin	Lotito, Mark
Lott, Elizabeth	Lott, Susan	Lotz, Jonathan	Lou, Alicia	Lou, Ray	Loubere, Stephan
Louck, Marion	Loucks, Cynthia	Loudis, Catherine	Louie, Philip	Louis, Jamie	Louis, Jane
Louis, Md, Joanna	Loureiro, Kimberly	Loureiro, Mari	Lourenco, Joseph	Louvis, Frank	Love, Bob
Love, Jennifer	Love, Jerri	Love, Lindsley	Love, Linsey	Love, Monique	Love, Reeve
Love, Victor	Loveday, Tamera	Lovelace, Lanelle	Lovelace, Marcia	Loveless, Peggy	Lovell, Angela
Lovell, Cynthia	Lovell, Linda	Lovell, Tim	Lover, Linda	Lovgren, Nick	Lovick, Donna
Lovig, Susan	Lovins, Hunter	Lovins, Lance	Low, David	Low, Grant	Low, Sammy
Lowden, Barbara	Lowe, David	Lowe, Jacklyn	Lowe, James	Lowe, Jamie	Lowe, Jerry
Lowe, Judith	Lowe, Justin	Lowe, Karen	Lowe, Kay	Lowe, Kay	Lowe, Margot
Lowe, Melissa	Lowe, Monitta	Lowe, Rosemary	Lowe, Susan	Lowe, Tom	Lowell, Catherine
Lowell, Francine	Lowen, Steve	Lowenthal, Mark	Lowenthal, Steven	Lowentrout, Brandon	Lowery, Candice
Lowery, Joanne	Lowe-vaughn, Elise	Lowrey, Elaine	Lowrie, Janie	Lowry, Jayne	Lowry, Marsha
Lowry, Pamela A.	Lowther, Larry	Lowy, Sandra	Lozada, Miguel	Lozano, Claudia	Lozano, Jackie
Lozano, Lydia	Lozaw, Kevin	Lozier, Richard	Lozon, Kristina	Lozow, Karen	Lozser, Marissa
Lrke, Charmian	Lu, Michael	Luanglue, Melissa	Lubenkov, Paul	Lubicznawrocki, Chris	Lubin, Diana
Lubin, Hilary	Lubin, Marshall	Lubitz, Iris	Lucas, Janie	Lucas, John	Lucas, Ken
Lucas, Kurt	Lucas, Marilyn	Lucas, Michele	Lucas, Nancy	Lucassen, Rosaire	Lucero, Kristen
Lucero, Marsha	Lucey, Michael	Luchetti, Jan	Lucia, Angela	Luciano, Liana	Luciano, Peter
Luciole, C.L.	Luck, Patricia	Lucken, Deana	Luckens, Dave	Luckhardt, Andrew	Luckman, Paul
Luckowski, Susan	Ludin, Fritz	Ludington, Denise	Ludington, Mary	Ludlam, Jessica	Ludlow, Laurie
Ludwick, Heidi	Ludwick, Russ	Ludwig, Deb	Ludwig, Gretchen	Ludwig, Kay	Lueders, Kira
Luehrmann, Paul	Luenow, Brian	Luerssen, Amanda	Luerssen, Karen	Luff, David	Luft, Ann
Lugacy, Talia	Lugauer, Roswitha	Luhmann, Lottie	Luhring, Carl	Luiting, Faith	Lujan, Daniel
Lujan, Javier	Lukas, James	Lukaszewicz, Anna	Luke, Jeffrey	Luke, Terry	Lukich, Betty
Lukins, Joanie	Lulla, Tara	Lum, Christie	Lum, David	Lumbert, Wendy	Lump, Kenneth
Lumpkin, Kirk	Lumsden, Robert	Luna, Carlos	Luna, Jessica	Luna, Joni	Lunael, Dominic
Lunanova, Antonio	Lund, Dana And Cindi	Lund, Erna	Lund, Judy	Lund, Lora	Lundberg, Crys
Lundberg, Patrick	Lunde, Kristen	Lundell, Victoria	Lundemo, Charlotte	Lundgren, Mike	Lundgren, Scott
Lundholm, Mark	Lundquist, John	Lundvall, Breanna	Lunghi, Alyssa	Lunn, Sally	Lunow, Susan
Luoma, Andrea	Lupascu, Radu	Lupieri, Edmondo	Lupori, Stacy	Lupton, Alfred	Luscombe, Jessica
Lusian, Renee	Lusk Zuerlein, Melinda	Lusk, Chester	Lusk, Joanne	Lust, Nicole	Lustgarden, Steve
Lustig, Karen	Lutes, Toni	Luth, Sarah	Lutterman, Lloyd	Lutz, Nancy L.	Luu, Jane
Lux, Carol	Lux, Lauren	Lux, Robert	Lux, Thomas	Lyall, Victoria	Lybolt, Robin
Lyday, Margaret	Lydick, Eva	Lyford, Skip	Lyle, Lauren	Lyles, Karla	Lyman, Janet
Lyman, John	Lyman, Michael	Lyman, Teresa	Lynch, Bridget	Lynch, Charles W.	Lynch, Deb
Lynch, Dr. Kathleen M	Lynch, Elizabeth	Lynch, Gail	Lynch, Heidi	Lynch, John	Lynch, John
Lynch, John	Lynch, Kate	Lynch, Kathleen	Lynch, Lynda	Lynch, Marcelle	Lynch, Michal
Lynch, Mike	Lynch, Stephanie	Lynch, Susan	Lynch, Tom	Lynley, Lauren	Lynn, David
Lynn, Eleanor	Lynn, Jay	Lynn, Pamela	Lynn, Paula	Lynn, Sandra	Lynn, Sandra
Lynn, Sandy	Lynn, Stuart	Lynn, Virginia	Lyon, Kelly	Lyon, Maryann	Lyon, R. Terry
Lyon, Sally	Lyons, Beth	Lyons, Beth	Lyons, Jonathan	Lyons, Kerri	Lyons, Laura
Lyons, Lorne	Lyons, Louise	Lyons, Maggie	Lyons, Robert	Lyons, Sherry	Lyons, Zinnia
Lysle, Scott	Lystig, Rebecca	Lythcott, Rev. Philip	Lytle, Denise	Lytle, Gail	M, Amy
M, Bob	M, Bonnie	M, Carlos	M, Chelsi	M, E	M, E
M, Frances	M, K	M, Louie	M, N	M, P	M, R
M, Shamaila	M, Stephanie	M., Anna	M., John	M., Ms. Suzanne	M., Ulisses
M.c. Money, Christine	Ma, Frederick	Maarhuis, Kelly N Jack	Mabrey, Lesley	Mac Beth, Joan	Mac Innes, Diane
Mac Iver, Caitlin	Mac Tahgart, Kelly	Mac Tire, Ramon	Mac, Barb	Macabu, Frederico	Macadam, David P
Macal, Lynn	Macalpine, Barbara	Macan, Catherine	Macarthur, Charles	Macartney, Bill	Macaulay, Robert
Macavery, Tristan	Maccallum, Seamus	Maccari, Joan	Maccini, Michael	Maccollom, Alex	Macconaughasnyder, Morgan
Macconnell, John	Macdonald, Angus M	Macdonald, BC	Macdonald, Ethel	Macdonald, Hunter	Macdonald, Nena
Macdonald, Tajana	Macdonald, Tracey	Macdougall, Caroline	Macdougall, Kathleen	Macdougall, Scott	Mace, George
Mace, Pat	Mace, Renee	Macedo, Brenda	Macgillis, Miriam	Macgregor, Amber	Macgregor, Mary
Machado, Maria	Machet, Gilberte	Machotka, D	Machuca, Nicholas	Machuga, Margo	Machugh, Janice
Maciborka, Margaret	Macinnes, Brenda	Mack, Heather	Mack, Jean	Mack, Joanne	Mack, Jodi

Mack, Kim	Mack, Linda	Mack, Velta	Mackay, Jeanne	Mackay, Leslie	Mackay, Mary
Macke, Nathaniel	Mackechney, Kathy	Mackelvie, Elizabeth	Mackenn, Lee	Mackenzie, Catherine	Mackenzie, Judith
Mackenzie, Michelle	Mackenzie, Penny	Mackerer, Kathleen	Mackey, Angie	Mackey, David	Mackey, Gail
Mackey, Marian	Mackinnon, Alehea	Mackinnon, Bonnie Lynn	Mackinnon, Doug	Mackinnon, Nancy	Mackintosh, Anne Dean
Mackison, George	Mackura, Patricia	Maclamroc, Alan	Maclane, Susan	Maclaren, Malcolm	Maclean, Nancy
Maclean, Yolanda	Macleman, Linda	Macleod, Dianna	Macleod, Pascale	Macleod, Ramsay	Maclise, Lauren
Macmillan, Armando	Macmillan, Lisa	Macmurray, Christine	Macneil, D'anne	Macomber, Jessica	Macomber, Paul
Macomber, Paul	Macphail, Kristyn	Macphee, Nancy	Macpherson, Amber	Macpherson, Ph.d., Malcolm	Macrae, Duncan
Macwaters, Laura	Madarasz, E	Maddaluno, Anthony	Madden, Elizabeth	Madden, Fred	Madden, Lisa
Madden, Meg	Madden, Molly	Maddison, C. J.	Maddock, June	Maddox, Mitchell	Maddox, Rachel
Maddux, Barbara	Madeleine, Elizabeth	Maderak, Terry	Maderer, Susan	Madia, Justin	Madigan, Michael
Madison, Chelsea	Madison, Julian	Madison, Rose	Madison, Ryland	Madley, Susan	Madlin, Noah
Madlon, Sharon	Madnick, Neal	Madole, Gary	Madon, Sandra	Madorma, Ronnie	Madrazo, Angeles
Madrigal Garcia, Anna	Madsen, Margaret	Madueno, Katherine	Madzik, Paul	Maestas, Lisa	Maestresaborit, Alexis
Maestro, Betsy	Maez, Nicole	Magalas, Marie Christina	Magallanes, Araceli	Magallanes, Kaluk-----	Magallon, Andrew
Magallon, Christopher	Magallon, Katie	Magana, Adriana	Magana, Alberto	Magana, David B	Magana, Maria
Magana, Mireya	Magana, Rebecca	Magarian, Robert	Magdaleno, Robin	Magden, Veronica	Mage, Varalidaine
Maghakian, Michael	Magid, Dorothe	Magid, Joseph	Maginniss, Thomas	Magnano, J	Magnee, Lauren
Magnuson, Barbara	Magnuson, Paul	Magruder, Clayton	Magruder, Joanne	Maguire, Ashley	Maguire, Joel
Maguire, Sara Anne	Maha, Doris	Mahadeo, Ishwar	Mahadevan, Sunitha	Mahalanobis, Priti	Mahan, John
Mahan, Kathleen	Mahar, Jess	Maharaj, Ruvita	Maher, Kathleen	Maher, Nicole	Mahle, John
Mahlis, Larry	Mahon, Donal	Mahon, Jane	Mahoney, Jack	Mahoney, Jim	Mahoney, Krista
Mahoney, Rita	Mahoney, Shoshanna	Mahony, Nancy	Mahowald, Mary	Mahr, Frajo	Mahrat, Hana
Mahurin, Randy	Maida, Kathleen	Maier, Kathryn	Maier, Lisa	Mail, Barbara	Maines, Michele
Maines, Terrie	Mainland, Edward	Maino, Paola	Mainus, Virginia	Mainwaring, Constance	Mainz, Aaron
Maiorino, Monica	Mair, Lisa	Mair, Pat	Mairs, Nancy	Maisler, Michael	Maisto, Michelle
Maiuro, Bobbi	Majchrowicz, Johnine	Majercsik, Val	Majersky, Matt	Maka, Jean	Makarevich, Iggy
Makaruse, Justin	Makeda, Lillian	Maker, Charlene	Makins, Sarah	Mako, Shamiran	Makowski, Jane
Malamidis, Iakovos	Malanga, Vanessa	Malarney, Holly F.	Malaspino, Michelle	Malaszczyk, Mark	Malatesta, Louise
Maldonado, Edith	Maldonado, Gloria Linda	Maldonado, Nicole	Malecha, Dan	Malecki, Kelly	Malen, Judith
Maleski, Karen	Maliagros, Margie	Malick, Justin	Malkerson, J.	Malkin, Kenneth	Mallagh, Michael
Mallahan, Lisa	Mallalieu, Frank	Mallalieu, Kathy	Maller, Jon	Mallett, Barbara	Mallette, Toni
Malley, Karen	Mallilo, Philip	Mallon, Danielle	Mallonga, Leo Danny	Mallory, Brad	Mallory, Jesse
Mallory, Steven	Malloy, Jane	Malloy, John	Malloy, Lori	Malloy, Mary	Malmberg, Greg
Malmid, Stuart And Wendy	Malmuth, Sonja	Malo, Janet	Malone, Crystal	Malone, Dave	Malone, Frank
Malone, Jenifer	Malone, Kevin	Malone, Maggie	Malone, Margaret Ann	Maloney, James	Maloney, Lisa
Maloney, Lucero	Maloney, Maria	Maloney, Martin	Maloney, Norma	Maloney, Patrick	Maloney, Philip
Maloneybrown, Patricia	Malouf, Judy	Malsheimer, Fran	Malt, Ilene	Maltby, Paul	Malter, B.
Maltese, Victoria	Malueg, Gregory	Malven, Laura	Malz, Leslie	Mammana, Lou	Mamut Sosa, Valentina
Man, Cave	Manary, Gordon	Manasco, Linda	Manchester, Sean	Manciagli, Julie	Mancini, Jennifer
Mancini, Melissa	Mancuso, Candy	Mancuso, Erica	Mandacen, Claudia	Mandarich, Victor	Mandarino, Lynda
Mandelblatt, Rande	Mandell, Anne Marie	Mandell, Risa	Mandell, Sheila	Manderfeld, Jennifer	Manderscheid, Gerald
Mandler, Ashley	Mandy, Lauren	Manel, Joanne	Maness, Bernadette	Mangan, Deborah	Mangan, Lori
Manganiello, Paul	Manganiello, Wendy	Manganvanham, Juanita	Mangatu, Augustine	Mangels, James	Mangini, Robin
Mangus, George	Mangus, Tracey	Manheim, Lynn	Maniscalco, Michele	Manjarres, Graciela	Manka, Joann
Mankin, Lisa	Mankowski, Craig	Manley-allen, Don	Mann, Edith	Mann, Jill	Mann, Joan
Mann, Kaye	Mann, Lisa	Mann, Louise	Mann, Renee	Mann, Susan	Mann, William
Manna, Anthony	Manner, Jennifer	Manner, Mary Anne	Mannhalter, Cindy	Manni, Lisa	Manning, Gerry
Manning, J.	Manning, Mary	Manning, Patricia	Manning, Robert	Manning, Russell	Manning, Tanya
Manning, Thomas	Mannix, Sharon	Manochio, Cate	Mansberger, Naomi	Manser, Dr. William	Manser, Rhonda
Mansfield, Fae	Mansfield, Marianne	Mansfield, Terry	Mansfield, Tony	Manske, Amber	Manske, Elizabeth

Manso North, Dave	Mansolilli, Catherine	Mansour, Jason	Mantak, Jon	Manter, Larry	Mantey, Emily
Manthey, Patti	Mantooth, Warren	Mantz, Riane	Manuel, Ancie Leigh	Manuel, Joseph	Manuele, Morgan
Manz, Laura	Manzella, Robert	Mara, Leo	Mara, Mara	Maracle, Mariah	Maraghy, Chris
Maragon, Lisa	Marais, Pierre	Marak, Valerie	Maraldo, Mario	Marallo, Maria	Maran, Sugu
Marancik, D	Marano, George Jr.	Marasco, Summer	Marashinsky, Amy Sophia	Marceau, Paul	Marcellis, Anita
Marcello, Jason-cristofe	Marceron, Dennis	March, Mary	March, Robert	Marchbanks, Julie	Marchesoni, Joel
Marciani, Barbara	Marciano, Jeffrey	Marcille, Christopher	Marckwardt, Patricia	Marcotti, Wendee	Marcoux, Catherine
Marcus, Chris A.	Marcus, Martin	Marcus, Sybil	Marczyk, Cathy	Mardiros, Mary	Marek, Dimitri
Mareneck, Carli	Maresca, Suzanne	Maresh, Vern	Maret, Jacqueline	Margaras, Alexandra	Margay Burke, Bonnie
Marge, Debra	Margerum, John	Margeson, Don	Margolis, David	Margolis, Laurence	Margono, Susanne
Margos, J. F.	Margraf, Lisa	Margulies, Jeffrey	Margulies, Lee	Mariani, Louis	Marie, Alice
Marie, Jasmine	Marie, Lisa	Marie, Sister James	Maries, Adrian	Marin, Lynda	Marin, Wilbur
Marineau, Nathan	Marinelli, Dean	Marinilli, Steve	Marino, Amy	Marino, Dominic	Marino, John
Marino, Michael	Marino, Nate	Marinucci, Lou	Mariott, Jerri	Maris, Christina	Marish, Elka
Mariski, Laura	Mark, Alex	Markee, Siobhan	Markert, Lynn	Markevich, Christel	Markey, Dana
Markgraf, Steven	Markham, John	Markham, Leslie	Markillie, Paul	Markovich, Jodee	Markovich, Maya
Markowitz, John	Markowitz, Peter	Marks, Amanda	Marks, Elise	Marks, Emerson	Marks, Eva
Marks, J.	Marks, Jack	Marks, Kelly	Marks, Ronald	Markson, Craig	Markunas, George
Markus, Caitlin	Markuswalczak, Kathleen	Markwood, Jean	Marley, Bryan	Marlowe, Jill	Marmulstein, Lynne
Marner, Paul	Marocchino, Phd, Kathryn	Marohn, Kris	Marold, Doran	Maroney, Emily	Marple, Jeanne
Marquardt, Barbara	Marquart, Frances	Marquart, Jesse	Marquart, Vicki	Marquette, Christine	Marquez Iii, Mariano
Marquez, John	Marquez, Magdalena	Marquez, Mario	Marquezmartinez, Tatiana	Marquis, Bruce	Marquis, Julie
Marquis, Thomas	Marr, Jami	Marr, Rhonda	Marrero, Arnold	Marrino, Joseph	Marriott, Nancy
Marrone, Rhonda	Marsala Jr, Joseph	Marschner, Sandra	Marsden, James	Marsh, Carol	Marsh, Frank
Marsh, Marion	Marsh, Melanie	Marsh, Rob	Marsh, Suzanne	Marshall, Carol	Marshall, Charles
Marshall, Dorrine	Marshall, Edna	Marshall, Eileen	Marshall, Erin	Marshall, Hermine	Marshall, Joan
Marshall, Kristi	Marshall, Lara	Marshall, Linda	Marshall, Patricia	Marshall, Raymond	Marshall, Rebecca
Marshall, Richaed	Marshall, Ruth	Marshall, Stephen	Marshall, Thomas	Marshall, Victoria	Marshland, Susanna
Marsocci, AL	Marston, Donna	Marston, Gregory	Marston, Gwen	Martel, Linda	Martell, Jane
Martell, Sandee	Martens, David	Martens, Martina	Marter, John	Martillo, Ruth E.	Martin Iii, Robert
Martin, Abe	Martin, Anne C.	Martin, Barbara	Martin, Barbara J	Martin, Ben	Martin, Benjamin
Martin, Brenda	Martin, Carolyn	Martin, Carson	Martin, Cathy	Martin, Chase	Martin, Chloe
Martin, Craig	Martin, Cyrus	Martin, David	Martin, Deborah	Martin, Dolores	Martin, Donna
Martin, Drew	Martin, Edna	Martin, Elizabeth	Martin, Gerry	Martin, Glenn	Martin, Glenn H.
Martin, Greg	Martin, Gregory	Martin, H Celeste	Martin, Jeff	Martin, John	Martin, Joy
Martin, Jr, Charles	Martin, Julia	Martin, Julie	Martin, Kai	Martin, Kathleen	Martin, Kathryn
Martin, Kathy	Martin, Kay	Martin, Kenneth	Martin, Kurt	Martin, Kyle	Martin, Linda
Martin, Marilyn	Martin, Martha E.	Martin, Maryjoy	Martin, Meredith	Martin, Michael	Martin, Miguel
Martin, Morris	Martin, Nancy	Martin, Patrick	Martin, Paul	Martin, Rebecca	Martin, Rose And John
Martin, Sara	Martin, Shawn	Martin, Sheila	Martin, Sindy	Martin, Stela	Martin, Sylvia
Martin, Terry	Martin, Tim	Martin, Tobe	Martin, Tracy	Martin, V	Martindale, Maria
Martinet, Thomas A.	Martinez Strom, Adeline	Martinez, Alma	Martinez, Amanda	Martinez, Ana	Martinez, Antonio
Martinez, Bianca	Martinez, Bradley	Martinez, Brittany	Martinez, C	Martinez, Cherie	Martinez, Claudia
Martinez, Dana	Martinez, Daniel	Martinez, Eric	Martinez, Janet	Martinez, Janie	Martinez, Joan
Martinez, Judith	Martinez, Kathy	Martinez, Lillian	Martinez, Linda	Martinez, Lorraine	Martinez, Mari
Martinez, Mariah	Martinez, Maryann	Martinez, Maureen	Martinez, Megan	Martinez, Patricia	Martinez, Priscilla
Martinez, Rachel	Martinez, Susan	Martinezbarrett, Norma	Martini, Lorenzo	Martini, Rich	Martino, Bianca
Martino, Irmgard	Martinson, Ernest	Martire, Rosa	Martorano, Joan	Martwick, John	Martz Dick, Aimee
Marumoto, Kerry	Maruri, Trishia	Marvonek, Arlene	Marvy, Nancy	Marx, Janet	Marx, Scott
Marx, William	Maryniak, Patricia	Marzban, Karina	Marzocchi, George	Marzouki, Rieka	Masani- manuel, Nzingha
Masar, Jacki	Maschke, Nicole	Masdon, Benny	Maseda-gille, Sheila	Maseduca, Heidi	Mash, Khair

Mashuda, Helen	Maslana, Daniel	Maslanek, Michael	Maslar, Georg	Mason, B	Mason, Barbara
Mason, Betty	Mason, Brian	Mason, Carol	Mason, Dawn	Mason, Kacie	Mason, Lance
Mason, Lynette	Mason, Margaret	Mason, Marty	Mason, Mary M.	Mason, Maryann	Mason, Mike
Mason, N	Mason, Nancy	Mason, Robert	Mason, Sam	Mason, Terri	Mason, Windy Grace
Masoncup, Ande	Masood, Nasir	Massar, Marc	Massaro, Meg	Massaro, Sherry	Masse, Kierstin
Massey, Brittani	Massey, Carolyn	Massey, Floyd	Massey, Jack	Massey, Linda	Massie, Carmen
Massimino, Jacki	Mission, Gene	Mastaitis, Ben	Masters, Linda	Masters, Mary	Masters, Shehrever
Masters, Susan	Masters, Trevor	Mastrella, Jackie	Mastri, Len	Mastro, Cynthia	Mastro, DR
Mastrototaro, Domenico	Masucci, Donald	Masullo, Annie	Masunu, Shane	Matallana, Andrea	Matallana, Santiago
Matar, Adam	Matas, Barbara	Matasick, Marcy	Mataz, Raz	Mates, Susan	Mateus, Malu
Matheny, Albert	Mathes, Barbara	Matheson, Elaine	Mathew, Elizabeth	Mathews, Adam	Mathews, Brian
Mathews, Brooks	Mathews, Carole	Mathews, Christine	Mathews, Dorothy	Mathews, Peter	Mathews, Robert
Mathews, Tamara	Mathwig, Jarret	Matlack, Betsy	Matlin, Thelma	Matlock, Dale	Matson Jr., Anthony
Matson, Kathleen	Matson, Leila	Matsui, Jerry	Matsui, Vicky	Matsumoto, Mari	Matta, Diane
Mattan, Steve	Mattes, Dale	Matteson, Dan	Matteucci, George	Matthaus, Gudrun	Matthes, Dakota
Matthew, Antonia	Matthew, Elaine	Matthew, Klare	Matthewas, Jerry	Matthews, Dan	Matthews, Debbie
Matthews, Jonathan	Matthews, Larissa	Matthews, Leo	Matthews, Marilyn	Matthews, Michele	Matthews, Monica
Matthews, Pamela L.	Matthias, Jonelle	Mattice, Marge	Mattingly, Georgia	Mattioli, Santo	Mattis, Kim
Mattison, Stephen	Mattocks, Kurt	Mattson, Renee	Mattson, Virginia	Mattys, Brian	Matulina, Karen
Maturen, Virginia	Matuszak Ph.d., David	Matuszak, Sarah	Matwichuk, Gail	Matz, Pat	Matzinger, Margaret
Mauer, Jan	Mauet, Sarah	Maughan, Margith	Mauney, Ken	Maupin, Elizabeth	Maurer, Darlene
Maurer, Hillary	Maurer, J	Maurer, Kathleen	Maurer, Marilyn	Maurer, Tim	Mauri, Sara
Maurice, Bob	Maurice, Ken	Maurice, Rene	Maurin, Margaret	Maus, Virginia	Mauser, Sarah
Mauss, Larry	Mavor, Susan	Mawhorter, Jerry	Max, Judith	Maxedon, Edward	Maxey, Eileen
Maxson Proud, Barbara	Maxwell, Barry	Maxwell, Claranetta	Maxwell, Keith	Maxwell, Lou Anne	Maxwell, Mindy
Maxwell, Roger	May, Alicha	May, Carol	May, Dana	May, Donald	May, Hildy
May, Jennifer	May, Lana	May, M	May, M S	May, Marylyn	May, Maureen
Maye, Shaterra	Mayer, Drew	Mayer, George	Mayer, Kari	Mayer, Kellly	Mayer, Ken
Mayer, Michael	Mayer, Ramona	Mayerat, Robin	Mayers, Marilyn	Mayers, Natasha	Mayes, JO
Mayes, Steven & Susan	Mayfield, James	Mayfield, Joy	Mayger, Bonnie	Maynard, William	Mayo, Jane
Mayo, Joseph	Mayor, Jennifer	Mayorga, Teresa	Mayosky, Denise	Mayotte, Mark	Mayr, Belkiss
Mays, Brian	Mays, Jeb	Mayther-slac, Mary	Mayton, Jon	Maywald, Persephone	Maza, Patricia
Mazar, Laura	Mazar, Sheila	Mazauskas, Chris	Mazey, Susan	Mazhnyy, Mark	Mazias, Melissa
Mazza, Elizabeth	Mazza, Marian	Mazza, William	Mazzolini, Jerry	Mazzone, Linda	Mazzuca, Dale
Mbayo, Edna	Mc Clarren, Janet Mila	Mc Connell, Joseph	Mc Coubrie, Elise	Mc Daniel, Kevin	Mc Donald, Charles
Mc Evoy, Thomas	Mc Gonigle, Paul	Mc Graw, Natasa	Mc Intyre, Spencer	Mc Keon, Robert	Mc Shane, Janice
Mcabee, Colleen	Mcaboy, Chris	Mcadam, Dona	Mcadoo, Pamela	Mcafee, AL	Mcafee, Nicolas
Mcalear, Elissa	Mcalister, Kevin W.	Mcalister, Michele	Mcalliser, Robert W	Mcallister, Bonnie	Mcallister, Bud
Mcallister, Cory	Mcallister, Crystal	Mcallister, Jean	Mcallister, Pamela	Mcallister, Phd, Helen	Mcalpin, Michelle
Mcalpine, Emily	Mcarthur, Diane	Mcartor, Robert	Mcaskill, Sophia	Mcatee, Nicole	Mcauliffe, Carole
Mcavery, Maryjon	Mcbrayer, Teresa	Mcbride Rn,, Linda	Mcbride, Debbie	Mcbride, James	Mcbride, Jess
Mcbride, John	Mcbride, Mary	Mcbride, Mikki	Mcbride, Timothy	Mcbride, Tracy	Mccaffrey, Liam
Mccaffrey, Richard	Mccahill, Jay	Mccaleb, Dorothy	Mccall, Elaine	Mccall, Karolyn	Mccalla, M
Mccall-tanzola, Anna	Mccammon, Doreen	Mccampbell, Christopher S	Mccandless, Julia	Mccandless, Susannah	Mccanlies, Katherine
Mccann, Ellen	Mccann, John	Mccardell, Alexandra	Mccarron, Jack	Mccarron, Joan	Mccart, Dale
Mccarthy, Carol	Mccarthy, Carole	Mccarthy, Christine	Mccarthy, Debbie	Mccarthy, J Patrick	Mccarthy, Kerry
Mccarthy, Lee Anne	Mccarthy, Loraine	Mccarthy, Maggie	Mccarthy, Mary Lynn	Mccarthy, Maureen	Mccarthy, Michael
Mccarthy, Mickey	Mccarthy, Patricia	Mccarthy, Sean	Mccarthy, Shirley	Mccarthy, Susan	Mccarty, Chris
Mccarty, Eric	Mccarty, Valerie	Mccaslin, Daniel	Mccathie, Kelsey	Mccauley, Brandi	Mccauley, Mary Sue
Mccaulley, Michelle	Mcclain, Tony	Mcclain, Wilma	Mcclaskie, Lance	Mcclasky, Stephen	Mccleary, Harriet
Mccleary, Susie	Mcclellan, Bryan	Mcclellan, Julie	Mcclellan, Terry	Mcclelland, Dan	Mcclelland, George
Mcclelland, Karin	Mcclendon, Joby	Mcclinton, Ben	Mccloskey, Patrick	Mccloud, Nan	Mcclune, Mark
Mcclung, Judy	Mcclure, Andrew	Mcclure, Eric	Mcclure, James	Mcclure, Jim	Mcclure, John
Mcclure, Sandy	Mcclurg, Daviann	Mccollam, Ronda	Mccollim, Jeff	Mccollum, Shirley	Mccollum, Tom

Mccomas, Barney	Mccomas, P. Douglas	Mccomb, Ron	Mccomb, Tarra	Mccombs, Gregory	Mccombs, Jeff
Mccombs, Robert	Mcconaghy, Barbara	Mcconkey, James	Mcconkey, Kimberly	Mcconnell, James	Mcconnell, Johanna
Mcconnell, Molly	Mcconville, Jim	Mcconville, Julia	Mccool, Mike	Mccorkle, Robert	Mccormack, Emily
Mccormack, Florence	Mccormick Montgomery, Margie	Mccormick, Bruce	Mccormick, Douglas	Mccormick, John	Mccormick, Joseph
Mccormick, Kate	Mccormick, Margo	Mccormick, Mark H.	Mccormick, Robert	Mccormick, Susan	Mccormick, Thomas & Michele
Mccorry, Eileen	Mccown, Norma	Mccoy, Allen	Mccoy, Amy	Mccoy, Louise	Mccoy, Marthe
Mccoy, Monya	Mccoy, Patti Ann	Mccradic, Anthony	Mccraig, Dhyana	Mccraw, John	Mccrea, Lynn
Mccreary, Jan	Mccrone, Eric	Mccrosky, Linda	Mccrossin, Kristin	Mccruden, Kerry	Mccue, Marylyle
Mccuen, Evan	Mcculloch, Jamie	Mcculloch, Martha	Mcculloch, Norma	Mccullough, Denali	Mccullough, Jeffrey
Mccullough, Justin	Mccullough, Linda	Mccullough, Lucy	Mccullough, Maureen	Mccullough, Michael	Mccullough, Paula
Mccullough, Tim	Mccullough, William	Mccully, Chris	Mccumber, John	Mccumber, Peter	Mccune, Bonnie
Mccurdy, Prescott	Mccurry, Nancy	Mccurry, Sally	Mccutcheon, Elizabeth	Mcdade, Margaret	Mcdaniel, Janice
Mcdaniel, John	Mcdaniel, Larry	Mcdaniel, Laura	Mcdaniel, Linda	Mcdaniel, Skot	Mcdermit, Evan
Mcdermot, Marianne	Mcdermott, Denise	Mcdermott, Jeff	Mcdermott, John	Mcdermott, Kevin	Mcdermott, Libby
Mcdermott, Mary	Mcdermott, Ruth	Mcdill, George	Mcdonagh, Janet	Mcdonald, Amanda	Mcdonald, Ben
Mcdonald, Bennie	Mcdonald, Betty Jo	Mcdonald, Carol	Mcdonald, Colleen	Mcdonald, Gabriel	Mcdonald, Holly
Mcdonald, Joyce	Mcdonald, Judy	Mcdonald, Julia	Mcdonald, Kathleen	Mcdonald, Kim	Mcdonald, R.
Mcdonald, Sandrine	Mcdonald, Stacey	Mcdonald, Thad	Mcdonald, Thomas	Mcdonald, Victoria	Mcdonnell, Catherine
Mcdonnell, Damian	Mcdonnell, Robert	Mcdonnell, Thomas	Mcdonough, Andy	Mcdonough, Brad	Mcdonough, Brenda
Mcdonough, Callahan	Mcdonough, Gail	Mcdonough, Judith	Mcdonough, Karin	Mcdonough, Mary Ann	Mcdonough, Shelley
Mcdonough, Suzanne	Mcdougal, Jerald	Mcdougall, Alec And Sandy	Mcdow, Derek	Mcdowell, Edward	Mcdowell, Keith
Mcelligott, Maxwell	Mcelroy, Mary	Mcelroy, Tressa	Mcelwain, Judith	Mcenearney, Elizabeth	Mcenroe, Eileen
Mcentee, Shannon	Mcevoy Price, Janet	Mcevoy, Aileen	Mcevoy, Theresa	Mcewan, Diane	Mcewan, Virginia
Mcfadden, Frederic	Mcfadden, Mary	Mcfadzen, Victoria	Mcfarland, Heather	Mcfarland, Karen	Mcfarland, Mary Ann
Mcfarland, Robert	Mcfarland, Sherry	Mcfatridge, Richard	Mcfee, Debra	Mcgahan, Kathy	Mcgahie, Peter
Mcganty, Erin	Mcgarry, A.	Mcgee, Carrie	Mcgee, Fred	Mcgee, George	Mcgee, Kathleen
Mcgee, Megan	Mcgee, Michael	Mcgee, Pennie	Mcgee, Robyn	Mcgee, Spencer	Mcgee, Terence
Mcgeehan, Kevin	Mcghee, Candace	Mcgill, Ann C.	Mcgill, Don	Mcgill, Joshua	Mcgill, Victor
Mcgillicuddy, Geri	Mcginley, Michael	Mcginn, Kay	Mcginnis, M.	Mcginnis, Nikki	Mcginty, Alison
Mcgladdery, Martin And Sharon	Mcglashan, Maria	Mcglynn, James	Mcgoldrick, Bill	Mcgonigal, Joan	Mcgough, Alice
Mcgovern, Jane	Mcgovern, Julia	Mcgowan, Ben	Mcgowan, Gail	Mcgowan, Meghan	Mcgowan, Richard
Mcgowan-smith, Lorna	Mcgrann, James M	Mcgrath, Barbara	Mcgrath, Christian	Mcgrath, Daniel	Mcgrath, Joan
Mcgrath, Joanne	Mcgrath, Michael	Mcgratty, Chris	Mcgratty, Jessica	Mcgraw, Cheryl	Mcgraw, Jamie
Mcgraw, Libby	Mcgraw, Mary	Mcgreevy, Jo Ann	Mcgregor, Denise	Mcgregor, Donald	Mcgregor, Hilary
Mcgrogan, Kathy	Mcguigan, Leeann	Mcguinn, Cinda	Mcguire, Ellie	Mcguire, James	Mcguire, Jessica
Mcguire, Maggie	Mcguire, Matthew	Mcguire, Patricia	Mcguire, Patrick	Mcguire, Renee	Mcguire, Sara
Mcguire, Sharon	Mcguire, Sheri	Mcgunagle, William	Mcholan, Shawna	Mchugh, Angela	Mchugh, Heather
Mchugh, Karen	Mchugh, Margaret C.	Mchugh, Patricia	Mcinerney, Anton	Mcinerny, Carol	Mcinnis, Diane
Mcintosh, James	Mcintosh, Patrick	Mcintosh, Phil	Mcintosh, Vibella	Mcintosh, Virginia	Mcintyre Jr., Charles
Mcintyre, Brenda	Mcintyre, Misty	Mcintyre, Terry	Mcjunkin, Diane	Mckamey, Eugene	Mckay, Amy
Mckay, Jeffrey	Mckay, Kathleen	Mckay, Ken	Mckay, Rachel	Mckean, Helen	Mckean, Mary Jane
Mckee, Donna	Mckee, Janet	Mckee, John	Mckee, Kane	Mckee, Krista	Mckee, Laura
Mckee, Richard	Mckee, Sarah	Mckeeman, Jana	Mckeever, Casey	Mckeever, Tim	Mckellar, John
Mckendall, Sr, Steven K.	Mckendry, Jeannie	Mckenna, James	Mckenna, Lori	Mckenna, Mary	Mckenna, Pamala
Mckenne, Michael	Mckenzie, Constance	Mckenzie, Kelli	Mckenzie, Mary	Mckenzie, Monte	Mckeon, Laurie
Mckeon, Renae	Mckevitt, Debbie	Mckillip, Linda	Mckim, Jan	Mckimpson, Jeanne	Mckinley, Greg
Mckinley, Kendall	Mckinley, Patti	Mckinney, Anne	Mckinney, Kathryn	Mckinney, Peter	Mckinney, Sam
Mckinnie, Robert	Mckinnon, Dawn	Mckinnon, Michael	Mckittrick, Katherine	Mcknight, Charles	Mcknight, Janet
Mcknight, Melissa	Mcknight-lupes, Jennifer	Mckownfinken, Amber	Mclane, Brenden	Mclane, Kathleen	Mclauchlan, Diane
Mclaughlin, Gary	Mclaughlin, Mark	Mclaughlin, Michael	Mclaughlin, Molly	Mclaurin, Phillip	Mclean, Bonnie
Mclean, Celeste	Mclean, Michael	Mclean, Susan	Mclellan, James	Mclellan, Joanne	Mclellan, Sandra

Mclennan, Kari	Mclennan, Miles W	Mcleod, Michael	Mcleod, Phoebe	Mcluckie, Sandra	Mcmackin, Mary
Mcmahan, Barbara	Mcmahan, Lindsey	Mcmahan, Michael	Mcmahan, Pamela	Mcmahon, Anah	Mcmahon, Annie
Mcmahon, Carol	Mcmahon, Denise	Mcmahon, Diane	Mcmahon, Kenneth	Mcmahon, Mary	Mcmahon-wilbur, Stacy
Mcmanigal, Judi	Mcmanus, Anne	Mcmanus, Carol	Mcmanus, James	Mcmanus, Kathleen	Mcmanus, Mara
Mcmanus, Michael	Mcmanus, Tim	Mcmaster, Bridget	Mcmenamin, Rosalie	Mcmichaels, John	Mcmillan, Reba
Mcmillan, Terry	Mcmillan, Wendy	Mcmillen, Caren	Mcmillion, Robin	Mcmullen, Ann	Mcmullen, Laura
Mcmullen, Susan	Mcmurray, Michael	Mcmurtrie, Susan	Mcmurtry, Rebecca	Mcnall, Shirley	Mcnally, Monica
Mcnally, Susan	Mcnally, William	Mcnamara, Anita	Mcnamara, Catherine	Mcnamara, Eileen	Mcnamara, Faith
Mcnamara, Kevin	Mcnamara, Mair	Mcnamara, Nancy	Mcneal, Mariette	Mcneal, Samuel	Mcneely, Tom
Mcneil, Kerry	Mcneil, Sherry	Mcneill, Douglas	Mcneill, Roberta	Mcneill, Steve	Mcnellis, Gerald
Mcneny, Lindsey	Mcnerney, Jerome	Mcnichol, Tom	Mcnicol, Lottie	Mcniel, Jim	Mcnitt, Doris
Mcnown, Mark	Mcnulty, Terrence	Mcpartland, Eve	Mcpeak, Cynthia	Mcphail, Robert	Mcpharlin, Carol
Mcpherson, Alan	Mcpherson, Andrew	Mcpherson, Charles	Mcpherson, Kay	Mcq, Daniel	Mcquade, Gleni
Mcqueen, Jennifer	Mcqueeney, Joe	Mcquitty, Mark	Mcquown, Dorothy	Mcrae, Jean	Mcreynolds, Julie
Mcswain, J.	Mcternan, Kourtney	Mcvearry, Lisa	Mcvein, Barbara J	Mcvey, James	Mcvicker, Diane
Mcvinnie, David	Mcwhinney, Mark	Mcwilliam, W	Mcwilliams, Cynthia	Mcwilliams, Cynthia	Mead, Becky
Mead, Caroline	Mead, John	Mead, Julee	Mead, Nancy	Mead, Stephen	Meade, Carolyn
Meade, David	Meade, Linda	Meade, Pattie	Meadows, Connie	Meadows, Erin	Meadows, Huby
Meadows, Marcy	Meads, Mary Sue	Meagher, Shelly	Meakin, Joanna	Means, Stephen	Meany, Mary
Meara, Robyn	Mears, Justin	Measel, Margaret	Mechanic, Diane	Meck, Wanda	Meckler, Deborah
Medbery, Julie	Medeiros, Joe	Medeiros, Kyle	Medel, Maria	Medina, Emma	Medina, Francisco
Medina, Kathleen	Medina, Mark	Medlin, Barry	Medlin, Julie	Medoff, Kathryn	Medrano, Anna
Medved, Paul	Meecham, Amanda	Meehan, Don	Meehan, Emma	Meek, Jeffrey	Meeker, Carlene
Meeker, Chris	Meeks, John	Meeks, Mark	Meersman, Danielle	Meersman, Larry	Megay, Gina
Megenity, Douglas	Meghani, Humera	Megowan, Patrick	Mehaffey, Gail	Mehan, Nancy	Mehemed, Sharleen
Mehl, Carole	Mehle, Anthony	Mehler, Maureen	Mehlhorn, Michelle	Mehlman, Barbara	Mehring, Valerie
Meier, Axel	Meier, Colin	Meier, D.	Meier, Pamela	Meier, PJ	Meier, Randy
Meier, Ron	Meier, Thomas	Meier, Tim	Meikle, Doug	Meiland, David	Meilinger, Rebecca
Meincke, Arthur	Meinen, Marian	Meinhardt, Kevin	Meinhardt, Mark	Meinhardt, Pamela	Meinrath, Colin
Meisch, Debbie	Meischke, Mary	Meisenhelder, Thomas	Meisinger, Julie	Meislin, Barbara	Meister, Richard
Mejia, Marianna	Mejides, Andres	Melcher, Philip	Melcher, Sarah	Melchior, Robin	Meldahl, Judith
Meldrum, Nikki	Mele, Joe	Melendez, Orlando	Melendez, Will	Melendrez, George	Meles, Susan
Meli, Michele	Melino, Diane	Melis, Luc	Mell, Lisa	Mellgren, Bruce	Melli, Luca
Melliadis, Noreen	Mellina, Sandy	Mello, Alondra	Melmon, Jennifer	Melnick, MA	Melnick, Ruth
Melo, Elizabeth	Melody, Henry	Melody, Patricia	Melone, L.	Melora, Carolann	Melotti, Laura
Melrood, Amanda	Melson, Emily	Melsted, Marino	Melton, Alyssa	Melton, Jim	Melton, Joan
Melton, Kathryn	Melton, Kathy	Melton, Nancy	Melton, Rita	Meltzer, Iris	Meltzer, Joel
Meltzer, Rachel	Melville, Terri	Meminger, Howard	Memmert, Jonathan	Menard, Jana	Menard, Rose Marie
Mencik, Jitka	Menconi, Elissa	Mende, Lisa	Mendelsohn, Cal	Mendelson, David	Mendelson, Mimi
Mendes, Desiree	Mendez, Javier	Mendez, John	Mendez, Krystle	Mendez, Molly	Mendez, Virginia
Mendieta, Vince	Mendiola, Jennifer Rian	Mendiola, Roland	Mendiola, Shannon	Menditto, Juliet	Mendousa, Tina
Mendoza, Dale	Mendoza, Felipe	Mendoza, Israel	Mendoza, Miranda	Menechella, Tony	Menefee, Mendi
Menendian, Cathy	Menkart, Bethany	Menke, Peggy	Menkes, C	Menne, Suzanne	Menne-lbell, Mari
Mensing, Patricia	Menzel, Andrea	Menzel, Sandra	Meraz, Jill	Mercaitis, Pat	Mercaldohassan, Barbara
Mercer, Angel	Merchant, Deb	Meredith, Micki	Merino, Margaret	Meriwether, Melissa	Merkel, Alison
Merkel, Alison	Merkel, Karynn	Merker, Fran	Merker, Fred	Merla, Patrick	Merle, Lynn
Merli, Mirna	Merlino, Gloria	Merljak, Julija	Merlo, James	Merlo, Joan	Mermel, Randy
Merrell, Quinn	Merrick, Lisa	Merrigan, Anita	Merrill, Barbara	Merrill, Cathy	Merrill, David
Merrill, Haley	Merrill, Kate	Merrill, Lisa	Merrill, Rebecca	Merrill, TD	Merriman, John
Merrin, James	Merryman, Arlene	Merryman, Elizabeth	Mershon, Joan	Mertely, William	Mertens, Kathy
Mertig, Theodore	Mertz, Robert	Merwe, Kevin	Merz, Robert	Meshkinpour, Mahin	Mesias, Briana
Meskus, George	Meslar, Gerald	Messenger, Cathie	Messenheimer, Kim	Messer, Christine	Messer, Sheila
Messick, Debbie	Messier, Linda	Messina, Jennifer	Messina, Jim	Messina, June	Messina, Ronald
Messinger, Lisa	Messinger, Sharon	Messino, Janice	Messling, Gordon	Mestas, Victor	Meszaros, Michael

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Methot, Jack	Methven, Bernadette	Methvin, Barbara	Metress, Eileen	Metrov, D. A.	Metsinger, Pat
Metters, Robert	Metz, Cassandra	Metz, Emily	Metz, Lorna	Metz, Tammy	Metzger, Harvey
Metzler, Joanne	Metzloff, Paul	Meuer, Rita	Meury, Paul	Meuse, Jessica	Meyer, Ari
Meyer, Caitlin	Meyer, Christina	Meyer, Colonel	Meyer, Ferdinand	Meyer, Greg	Meyer, Hans
Meyer, Ian	Meyer, Jack	Meyer, Kaitlyn	Meyer, Katherine	Meyer, Katherine	Meyer, Melanie
Meyer, Peter	Meyer, Peter	Meyer, Ricardo	Meyer, Robert	Meyer, Susan	Meyer, Wendy
Meyers, Caryn	Meyers, Donna	Meyers, Kathi	Meyers, M.sc., Jeff	Meyers, Nancy	Meyers, Paul
Meyers, Preston	Meyers, Robert	Meyers, SA	Meyers, Sarah	Meyerson, Jennifer	Meyrowitz, Michele
Meza, Benjamin	Meza, Joel	Mezoff, Kathleen M	Mezynski, Estell	Mgrath, T	Mialaret, Nicolas
Micciulla, Adriana	Micek, Nathan	Michael, Amanda	Michael, Beverly	Michael, Gail	Michael, J.
Michael, Kelly	Michaela, Ali	Michaelis, Elke	Michaelis, Karen	Michaels, Brenda	Michaels, Charmaine
Michaels, Jr., Harry	Michaels, Laurel	Michaelsen, Donald	Michaelson, Kathy	Michaelstyner, Michelle	Michalek, Doug
Michals, Patricia	Michaud, James	Michaud, Lizann	Michaud, Noreen	Michel, Alwin	Michel, Coky
Michel, James	Michel, Julia	Michel, Julie	Michel, Vianey	Michell, Jen	Michelle, Martine
Michelli, Kathy	Michelson, Golda	Michetti, Susan	Michon, Leo	Mick, Lawrence	Mick, Marilyn
Mickelson, Charlie	Middlebrooks, Ethan	Middleton, Andrew	Middleton, Chris	Middleton, Dale	Middleton, ED
Midgley, Leonora	Midlan, M A	Midnight, S. A.	Midtbo, Barbara A	Midyette, Shirley	Mielke, Jeanine
Mientus, Marian Liza	Mier, Chris	Mier, Pedro	Mierlot, Monique	Mierzwa, Donna	Mietus, Norbert
Mietzner, Natalie	Mifflin, Jeffrey	Migdal, Marcia	Miglino, William	Mignano, Tempy	Mignatti, Janet
Mihalik, Joanna	Miiller, Victor	Mika, Gaia	Mika, Nicole	Mikaels, Sariah	Mikesell, Sara
Mikijanic, Vlad	Mikkelson Jonsson, Kristin	Mikkelson, Erin	Mikkelson, Greg	Mikolajczyk, Danielle	Mikolowski, Malorie
Miksovsky, Rose	Miksys, Matt	Mikulich, Sarah	Mikulich, Sharon	Mikulka, Diana	Mikus, T
Milan, Craig	Milano, Carol	Milano, Melissa	Milanovic, Bojan	Milanowski, Tanya	Milatovich, Lisa
Milbourn, Catherine	Milcarek, Thomas	Mile, Eva	Miles, Clifford	Miles, Dori	Miles, Drew
Miles, James R.	Miles, JD	Miles, Melissa	Miles, Mitchell	Miletta, Lara	Milford, Elizabeth
Milgram, Alexandra	Milhaupt, Shannon	Milione, Regina	Milkewicz, Charles	Milks, Jerome	Millar, Riff
Miller Jr, Michael	Miller, Adele	Miller, Adrienne	Miller, Alexander	Miller, Amanda	Miller, Amelia
Miller, Amy	Miller, Amy	Miller, Andy	Miller, Angela	Miller, Ann	Miller, Anne
Miller, Anne	Miller, Anthony	Miller, Arthur	Miller, Barbara	Miller, Bill	Miller, Blair
Miller, Brad	Miller, Carol	Miller, Caroline	Miller, Catherine	Miller, Catherine	Miller, Cheryl
Miller, Cindy	Miller, Connie	Miller, Dan	Miller, David	Miller, Dennis	Miller, Devon
Miller, Diana	Miller, Diane	Miller, Doretta	Miller, Edmund	Miller, Eleanor Joy	Miller, Ellen
Miller, Erika	Miller, Genevieve	Miller, Gillian	Miller, Harriet	Miller, Heather	Miller, Henry
Miller, Jack	Miller, Jaclyn	Miller, James	Miller, James	Miller, Janet	Miller, Jason
Miller, Jay	Miller, Jeff	Miller, Jennifer	Miller, Jerry	Miller, Jim	Miller, JL
Miller, Joan	Miller, Joann	Miller, John	Miller, Joshua	Miller, Judi	Miller, Judith
Miller, Karen	Miller, Kari	Miller, Kathleen	Miller, Kathy	Miller, Kathy	Miller, Keith
Miller, Kerby	Miller, Krista	Miller, Kristine	Miller, Laurie	Miller, Lee	Miller, Lee
Miller, Lena	Miller, Linda	Miller, Lisa	Miller, Loren	Miller, Louise	Miller, Lynn
Miller, Lynn	Miller, Mandana	Miller, Marcia	Miller, Marcia	Miller, Margretta	Miller, Marilyn
Miller, Marion	Miller, Marjorie	Miller, Marjorie	Miller, Mary	Miller, Mary	Miller, Melanie
Miller, Melanie	Miller, Melissa	Miller, Michael	Miller, Mieke	Miller, Nancy	Miller, Nichasie
Miller, Peg	Miller, Phil	Miller, Phillip	Miller, Rachel	Miller, Rebecca	Miller, Richard
Miller, Robert	Miller, Robert	Miller, Robert R.	Miller, Ruth	Miller, Ryan	Miller, Samantha
Miller, Sandi	Miller, Sandra	Miller, Sandra	Miller, Sara	Miller, Sarah	Miller, Shannon
Miller, Shirley	Miller, Stephen	Miller, Steve	Miller, Susan	Miller, Susan	Miller, Tim
Miller, Tim	Miller, Timothy	Miller, Todd	Miller, Valerie	Miller, Vaughn	Miller, Wendy
Miller, Wister	Miller, Yvonne	Millholland, Hope	Millican, Jacob	Milligan, Susan	Milliken, Elizabeth
Milliken, Gerry	Milliken, Phyllis	Milliken, Ralph A.	Millis, Susan	Millman, Selena	Mills, Chance
Mills, Damon	Mills, DJ	Mills, Edward	Mills, Gayle	Mills, Krista	Mills, Lois
Mills, Melinda	Mills, Richard	Mills, Roger	Mills, Sandy	Milman, Kristy	Milne, Frances
Milne, Kathleen	Milner, ED	Milnes, Mary Ann	Milo, Chezare	Milon, Catherine	Milona, Vasiliki
Milonas, Nikolaos	Milow, Sally	Milrod, Bonnie	Milster, Amanda	Milton, Jack	Mimms, MP
Mims, Pat	Minasi, Carol & Dom	Minasian, Rose	Mindar, Richard	Mindas, Samantha	Minden, Mechelle
Mineart, Denise	Mineart, Denise	Miner, Mike	Miner, Tanya	Minerovic, Constance	Minert, Carolyn

Minervini, Lynn	Mines, Elayne	Mingins, Candace	Mingue, CJ	Minic, Marija	Minish, Jennifer
Mink, Daniel	Minnick, Robert	Minor, Ali	Minor, Gina	Minor, Shannon	Minor, Stephen
Minson, Paul	Minter, Earl	Mintz, Barbara	Miotke, Victoria	Mirabella, Christine	Mirabile, Carl
Mirabile, Chantal	Miraglia, Vince	Mirand, Brian	Miranda, Claudia	Miranda, Hector	Miranda, Margaret
Miranda, Mike	Miranda, Rocio	Miranda, Yamila	Miranowski, Mary	Mireault, Kathleen	Mireille, Urbain
Mirgis, Colin	Mirk, Walter	Mirov, Lev	Mirsky, Seth	Mirzahossein, Sahand	Misenko, James
Mishoe, Nick	Misiak, Anthony	Misja, Benjamin	Miskovsky, Thomas	Mislove, Caroline	Misra, Praveen
Misra, Sunil	Missigman, Michele	Missimer Jr., Robert D.	Missler, Keary	Mistretta, Jill	Mistretta, Stephanie
Mitchel, Jan	Mitchell, Aaron	Mitchell, Abigail	Mitchell, Alexandria	Mitchell, Amy	Mitchell, Barbara
Mitchell, Brett	Mitchell, Charles S	Mitchell, Crystal	Mitchell, Dawn	Mitchell, Desiree	Mitchell, E
Mitchell, Echo	Mitchell, Greg	Mitchell, Jane	Mitchell, Jessica	Mitchell, John	Mitchell, Jonathan
Mitchell, Joseph	Mitchell, Kathleen	Mitchell, Kenneth	Mitchell, Kimberly	Mitchell, Lamar	Mitchell, Marie Barbara
Mitchell, Marilynn	Mitchell, Mary-frances	Mitchell, Michael	Mitchell, Michele	Mitchell, Michelle	Mitchell, Ogden
Mitchell, Phillip	Mitchell, Robert	Mitchell, Roi	Mitchell, Ron	Mitchell, Summer	Mitchell, Tamara
Mitchell, Tina	Mitchell, William	Mitchell, Yolanda	Mitchell, Zephyr	Mitchellduisberg, Anita	Mitchellhinojosa, Crystal
Mitcheltree, Laurie	Mitchum, Clarence	Mitre, Anthony	Mitri, Denise	Mitsuda, Michael	Mittan, Lisa
Mittelstaedt, Thomas	Mitterer, Nicole	Mittig, William	Mitts, Yolanda	Miville, Sharon	Mix, Andrew
Mix, Madhuri	Miyasato, Norman	Mizell, Keely	Mizell, Patricia	Mizrahi, Kerry	Mizutani, Joann
Mlawski, Leslie	Mlekarov, Noemia	Mlekodaj, James	Mnercieca, Charles	Mo, MA	Moan, Diane
Moats, Michael	Mobley, Bret	Mobley, Mary	Moceri Sikes, Cathy	Mock, Anna	Mock, Carol
Mock, Neal	Moczarney, Cindy	Modarelli, David	Moderacki, Mary Deidre	Modesitt, Janice	Modica, Barbara
Modjeski, Jan	Modrzynski, Colin	Moe, Sharon	Moebus, Jill	Moehring, Pamela	Moeller, Alan And Lana
Moeller, Mary Joyce	Moeller, Robert	Moen, Lynn	Moersdorf, Rn, Lisa	Moffitt, Nancy	Moffo, Chris
Mogel, Barbara S.	Mogen, Jill	Mogg, Margaret	Mohan, Debi	Mohanty, Lopamudra	Mohning, Kathleen
Mohr Almeida, Ph.d., Kathy	Mohr, Anne	Mohr, Susan	Mohseni, Leila	Mohssin, Yasmine	Moiseyev, Maya
Moitoret, Cathryn	Moix, Jennifer	Mojarro, Lucia	Mokuahi, Suzie	Molder, Michael	Moldovan, Jeanette
Moldoveanu, Carol	Molen, Mark	Molenaar, Carlie	Molenkamp, Elizabeth	Molgora, Bianca	Moliere, Carmen
Molina, Francisco	Molina, Roberto	Molina, Samuel	Molinari, Simone	Molinero, Cynthia	Molitor, Leon
Molk, Adriel	Mollberg, W	Mollen, Phyllis	Molloy, Isabel	Molloy, Mark	Molnar, Reka
Moloney, Holly	Molony, William	Moloy, Linda	Molyneux, Rachelle	Molz, Lisa	Monahan, Bobbie
Mondazze, Gina	Mondragon, Irma	Money, Rachel	Monfette, Aggie	Monger, Becky	Monger, Pat
Monier, Barbara	Monkemeyer, Lenora	Monks, Kathleen	Monohan, Kali	Monreal, Amy	Monroe, AL
Monroe, Bonnie	Monroe, Cathy	Monroe, Cord	Monroe, Dianne	Monroe, Donna	Monroe, James R
Monroe, Lynn	Monroe, William	Monroy, Marelisa	Monson, Todd	Monster, Corinne	Montagno, Carla
Montague, Carol	Montague, David	Montague, Don	Montague, Joyce	Montague, Patricia	Montalbano, Chris
Montalvo, Joefenech	Montalvo, Patricia	Montaneli, Emil	Montanez, Camilina	Montanez, Irma	Montano, Janice
Montanus, Lisa	Monte, Mark	Monteforte, Judith	Monteiro, Ana	Montelatici, Luca	Monteleon, Marjorie
Montell, Paul	Montemayor, Alan	Montero, Deborah	Montero, Gus	Montes Deoca, Gabriel	Montes, Carlos
Mont-eton, Elaine	Montez, Pauly	Montford, Lawrence	Montgomery, Celia	Montgomery, Guy	Montgomery, Michael
Montgomery, Pamela	Montgomery, Patti	Montgomery, Rick	Montgomery, Roger	Montgomery, Susan	Montgomery, Svetlana
Montgomery, William	Monti, Chris	Montonen, Jane	Montoya, Marti	Montoya, Vanessa	Moody, Anne
Moody, Becky	Moody, Harold	Moody, Janeane And Ian	Moody, Jennifer	Moody, Peggy	Moody, Rebecca
Moody, Yvonne	Moon, Kay	Moon, Lauri	Moon, Naomi	Moon, Stuart	Mooney, Breeanna
Mooney, David	Mooney, Glenn	Mooney, Len	Mooney, Sandra	Moor, Judith	Moor, Sarah
Moore Jr, Joseph	Moore, Aaron	Moore, Angela	Moore, Ariel	Moore, Barbara	Moore, Charles
Moore, Cheri	Moore, Daniel	Moore, David	Moore, Deanne	Moore, Debra	Moore, Dottie
Moore, ED	Moore, Edith	Moore, Elizabeth	Moore, Elizabeth	Moore, Emily	Moore, Eric
Moore, G	Moore, Holly	Moore, Howard	Moore, Hugh	Moore, Janet	Moore, Kaleigh
Moore, Katrinka	Moore, Kaylee	Moore, Kevin	Moore, Lydia	Moore, Malcolm	Moore, Matt
Moore, Nadia	Moore, Nic	Moore, Pablo	Moore, Pam	Moore, Pauline	Moore, Rob
Moore, Ronald	Moore, Scott	Moore, Sheila	Moore, Sherrie	Moore, Suzanne	Moore, Teresa
Moore, Tina	Moore, Veronica	Moore, Virgil	Moore, Vivian	Moore, William	Moore, William
Moore, Zack	Moorehead, Catherine	Moorei, Patricia	Moorhead, Ruth	Moorthy, Pallavi	Moose, Helen

Mor, Mon	Mora, Maggie	Mora, Margaret	Mora, Sharon	Moraiti, Vicky	Morales, Fermin
Morales, Laurie	Morales, Makala	Morales, Margaret	Morales, Mario	Morales, Mia	Morales, Sergio
Morales, Sina	Morales, Sondra	Moralez, Teresa	Moran, Belinda	Moran, Connie	Moran, Daniel
Moran, James	Moran, Judy	Moran, Kristin	Moran, Liana	Moran, Mike	Moran, Richard
Moran, Tamarah	Morander, Kellyann	Morano, LU	Moras, Rebecca	Moraski, Kathy	Morasse, Lginda
Morby, Vicki	More, Robert	Moreau, Justin	Moreau, Katelyn	Morefield, Betty	Morefield, Brittney
Morehead, Dorothy	Morehouse, Dakin	Morehouse, Ralph	Moreira, Rui	Morel, Krystal	Morell, Mary
Morem, Susan	Moreno, Dolores	Moreno, Earl	Moreno, Eduardo	Moreno, Mayelly	Moreno, Ramon
Moreno, Tirso	Moreno, William	Moreno, Yirat	Morero, Linda	Mores, Frank	Morgan, Alecia
Morgan, Alexa	Morgan, Alyssa	Morgan, Belinda	Morgan, Bill	Morgan, Carol	Morgan, Cedwyn
Morgan, Courtney	Morgan, Dot	Morgan, Emma	Morgan, Guthrie	Morgan, Jan	Morgan, Janine
Morgan, John	Morgan, Joshua	Morgan, Julie	Morgan, Julie	Morgan, Kathleen	Morgan, Lea
Morgan, Marilynn	Morgan, Merri	Morgan, Merrilee	Morgan, Michael C.	Morgan, Nancy	Morgan, Nancy
Morgan, Patty	Morgan, Paula	Morgan, Robert	Morgan, Starla	Morgan, Tess	Morgan, Tracy
Morgan, Tucker	Morgan, Wendy Elizabeth	Morganhickey, Diana	Morgan-kinsell, Judy	Morgenstern, Jack	Mori, Hiromichi
Moricca, Joan	Morig, Elizabeth	Morillas, Lourdes	Morin, Carla	Moris, Vonya	Morita, Ray
Moritz, Anna	Morner, Gabriel	Morningstar, Samuel	Morningstar, Theresa	Moroff, Madeline	Morphis, Daniel
Morrell, Carol	Morrell, Cheryl	Morrill, Kimberly	Morringello, Gerri	Morris, Cara	Morris, Charlotte
Morris, Cindy	Morris, Claude	Morris, David	Morris, Dee	Morris, Eleanor	Morris, Ellen
Morris, Eric	Morris, Kevin	Morris, Margaret	Morris, Mary	Morris, Megan	Morris, Merrill
Morris, Michael	Morris, Michelle	Morris, Richard	Morris, Shalini	Morris, Stephen	Morris, Steven
Morris, Sue And John	Morris, Susan	Morris, Susan	Morris, Susan	Morris, Tracy	Morrison, Allan
Morrison, Barb	Morrison, Beverly W.	Morrison, Bobby	Morrison, Carol	Morrison, Christina	Morrison, Cynthia
Morrison, Cynthia	Morrison, Donald	Morrison, Eric	Morrison, Gloria	Morrison, Jill	Morrison, Mary
Morrison, Michael	Morrison, Nancy	Morrison, Sam	Morrison, Wendy	Morrison, Wesley	Morrissey, Stephen
Morrisson, Susan	Morrone, Marina	Morrow, Dale	Morse, Alan	Morse, Esther	Morse, James
Morse, Jean	Morse, Jean	Morse, Marie	Morse, Patty	Morse, Sandy	Morsell, Mari
Morski, Jennifer	Mortensen, Susanne	Mortimer, Wayne	Morton, Anna	Morton, Bob	Morton, Karol
Morton, Robert And Denise	Morway, Sheila	Morwy, Alyce	Mosby, Joya	Moscatello, Brian	Moscato, Nick
Moscatt, Carlene	Moschetti, James	Moschopoulos, Charity	Moscona, Renpie	Moseley, Blair	Moseley, Kathy
Moser, Alex	Moser, Don	Moser, George	Moser, Janet	Moser, Paul	Moser, Rich
Moses, C R	Moses, David	Moses, George D	Moshel, David	Mosher, Joyce	Mosher, Judy
Mosher, Kathryn	Mosher, Melissa	Mosher, Moya	Mosher, Susan	Mosher-hiscock, Alice	Moshier, Joanie
Moskowitz, Mignon	Mosley, C.	Mosqueda, Anna	Moss, Brad	Moss, Gail	Moss, John
Moss, Marci	Moss, Michael	Moss, Paul	Moss, Rhea	Moss, Zelma	Mossor, Jill
Mostek, Karlene	Mosteller, John	Mothersill, Jane.casner	Motisher, George	Mott, Barbara	Mott, Marcie
Motteler, Catherine	Mottl, Michael	Mottola, Jenny	Motts, Nancy	Mouchon, Marc	Moulton, Frances K.
Moulton, Lisa	Moulton, Melissa	Moulton, Rachel	Moumin, Adrienne	Mountford, Mark	Mourant, Wanda
Moureilles, Tony	Mourtada, Hussein	Mouton, Alexander	Mouzourakis, Kathy	Mower, Amy	Moy, Kristine
Moye, Joe	Moyer, Bruce	Moyer, Cameron	Moyer, Duncan	Moyer, John	Moylan, Julie
Moyle, Eric	Moynihan, Ruth B	Mozanoski, Teri	Mozuch, Lee	Mrak, Dianne	Mramor, Andrew
Mrkvicka, Edward G.	Mroch, Suzanne	Mszal, Danuta	Mthe, Margaret	Mtsavage, R.	Mucci, Gregory
Mucci, Joseph	Mudd, Stephen	Mudrey, Susan	Mudrick, Stephen	Muehlhof, Charles	Mueller, Amy
Mueller, Andrew	Mueller, Brigitte	Mueller, Bruce	Mueller, Cheryl	Mueller, Elizabeth	Mueller, Gilbert
Mueller, Heather	Mueller, Helmut	Mueller, Jennifer	Mueller, K.L.	Mueller, Marcia	Mueller, Maryann
Mueller, Nancy & Helmut	Mueller, Steven	Muench, Jayme	Mueser, Karen	Mufson, Susan Alice	Mufti, Siraj
Mugglestone, Lindsay	Mugnani, Francisco	Muhs, Rocio	Muir, Tari	Muirhead, Barbara	Muirhead, Margaret
Muirhead, Timothy	Mukahirn, Charlotte	Mukminov, Timur	Mulas, Enzo	Mulcahy, Olga	Muldaur, Maria
Mulder, Brandon	Mulder, Brandy	Mulder, James	Mulder, Linda M.	Mulder, Mark	Muldowney, Mary Lou
Mulholland, G	Mulholland, Sarah	Mulilgan, Hilary	Mulkey, Kassandre	Mull, Fred	Mull, Frederica
Mullaly, Michael	Mullan, Kate	Mullane, Danny	Mullaney, Susan	Mullen, Carrie	Mullen, Charlotte
Mullen, Danielle	Mullen, Margaret	Mullen, Rachel	Muller, Abbe	Muller, Catherine	Muller, Gale
Muller, Kris	Muller, Maryanne	Mullican, Mack	Mulligan, Cheryl	Mulligan, Daniel	Mulligan, Margi
Mulligan, Sheila	Mullikin, Albert	Mullin, Barbara	Mullin, Deirdre	Mullin, Felicia	Mullin, Jon

Mullin, Martha	Mullin, Scott	Mullineaux, Dixie	Mullins, Amber	Mullins, Cathy	Mullins, Karen
Mullins, Kathy	Mulqueen, Pauline	Mulrennan, William	Mulshine, Peter	Mulsoff, Beth	Multer, Karen
Mulvany, Nancy	Mulvey, Donna Louise	Mulvey, Kevin	Mulvey, Lori	Mulvihill, Tim	Mumaw, Leeann
Mumford, Andrew	Mumpowerspriggs, Susan	Munch, Mary	Munday, Mary Mark	Munday, Sherrie	Munday, Ted
Mundine, Jennifer	Mundo, Mark	Mundt, Julie	Mundwiler, Nancy	Mundy, Jaye Anna	Mundy, Michael
Mungenast, Tim	Munger, Silvia	Munhall, Michael	Munnich, Della	Munno, John	Munoz, Angela
Munoz, Giannelli	Munoz, Julie	Munoz, Max	Munoz, Melina	Munoz, Melissa	Munozkiehne, Marisol
Munro, Alan	Munro, Karen	Munroe, Mary	Munshower, Kate	Munson, Joe And Marla	Munson, Kenneth
Munster, Krista	Muntner, Linda	Munves, James	Munzel, Jon	Muprhy, Ellen	Muracciole, Benoit
Muramaru, Lynn	Muraro, Deb	Murayama, Joanne	Murcko, Terry	Murdoch, John	Murdoch, Kathtryn
Murdock, Christine	Murdock, Ilse	Murdock, Lauren	Murin, Leslie	Murken, Kendall	Murley, Joy
Muro, Thaybee	Murphey, Kelly	Murphy, Anna	Murphy, Betty	Murphy, Cathern	Murphy, Christina
Murphy, Cindy	Murphy, Connie	Murphy, Courtney	Murphy, Dacia	Murphy, Dan	Murphy, Debbie
Murphy, Deborah	Murphy, Deborah	Murphy, Denise	Murphy, Dylan	Murphy, Elisa Derbes	Murphy, Irene
Murphy, Isaac	Murphy, James	Murphy, Jan	Murphy, Janelle	Murphy, Jessica	Murphy, Joanie
Murphy, John	Murphy, John Kelly	Murphy, Joyann	Murphy, Judith	Murphy, Karen	Murphy, Krishna
Murphy, Liz	Murphy, Lucinda	Murphy, Maeve	Murphy, Maryann	Murphy, Michael	Murphy, Michael
Murphy, Miriam	Murphy, Patricia	Murphy, Patricia	Murphy, Richard	Murphy, Thomas	Murray, Anita
Murray, Ben	Murray, Brian	Murray, Cathren	Murray, Colleen	Murray, Dan	Murray, David
Murray, David	Murray, E	Murray, Edward	Murray, Evan	Murray, Ian	Murray, Jennifer
Murray, John	Murray, Linda E	Murray, M	Murray, Margaret	Murray, Marilee	Murray, Michelle
Murray, Ozell	Murray, Rosemary	Murray, Roxann	Murray, S	Murray, Sandra	Murray, Suzanne
Murray-dailey, Marycolette	Murty, Catherine	Murugesan, Thanaletchumi	Muryn, Lisa	Musante, Sandra	Muschietti, Laura
Muse, Dyan	Muse, Kathy	Musetti, Jane	Musgrave, Drew	Musgrove, Jeanne	Mushkin, Casey
Musica, Nick	Musick, Doug	Musleve, Benita	Muss, Kate	Musselman, Kimberly	Musselman, Sheila
Musser, Kathy	Musser, Marsha	Musto, Emma Jean	Muszynski, Gloria	Mutchler, Ruth	Mutter, Maria
Muzante, Michele	Muzychka, Rebecca	Myatt, Patti	Mychkovsky, George	Myers, Alva	Myers, Ann
Myers, Bret	Myers, Carol	Myers, Christie	Myers, Dean	Myers, Derald	Myers, Diane
Myers, Donald	Myers, Elena	Myers, Heidi	Myers, Jan	Myers, Kate	Myers, Keith
Myers, Linda	Myers, Linda	Myers, Mary	Myers, Michelle	Myers, Monica	Myers, Raquel
Myers, Sonya	Myers, Stephanie	Myers, Tamara	Myhre, Harold	Mylar, Pat	Myles, Paula
Mylott, Sharon	Myrick, Mike	Myron, Suzanne	Myslajek, Jan	Mystic-healer, Lynn	N, Amelia
N, Anabel	N, Kris	N., Elisabeth	Naa, Susan	Naar, Ann	Nacheff, Marni
Nacheman, Elinor	Nadeau, Annette	Nadeau, Jeanette	Nadeem, Alea	Nadel, Barbara	Nadel, Barbara
Nadel, Robin	Nader, Loralei	Nadreau, Gerald	Nae, Maude	Nafziger, Nikki	Nagarajan, Vidya
Nagel, Clinton	Nagel, Dayle	Nagel, Karen	Nagel, L.	Nagle, Courtney	Nagle, Mirabai
Nagorna, Tetyana	Nagy, Derek	Nagy, Karen	Nagy, Marilee	Nai, Lina	Naidnur, Joseph
Naidu, Soumya	Naimark, Mona	Naissant, Jessica	Najera, Diana	Naji, Eric	Najia, Rosa
Nakadegawa, Judy	Nakakihara, Karen	Nakamura, Alex	Nakamura, Lisa	Nakano, Carolyn	Nakashima, Cynthia
Nakauchi, Asako	Nakayama, Garry	Nall, Linda	Namanworth Ofs, Andrea	Nancy, Carey	Nanna, Art
Nap, A	Napier, Tamara	Naples, Jean	Napoleon, Laura	Nappie, Matthieu	Naranjo, Arlene
Narasimhan, Revathi	Narasimhan, Subha	Narcisse, April	Nardell, Jason	Nardella, Nancy	Narducy, Suzanne
Narkon, Tara	Narve Jr, Henry	Nash, Charlene	Nash, Ellen	Nash, Heyward	Nash, Heyward
Nash, Jonathan	Nash, Margo	Nash, T	Nasrom, Muhammad	Nasta, Jeremy	Nasta, Steven
Nastasescu, Liviu	Nasuti, Paul	Nat, Lea	Natale, Susan	Natalini, Maria Rosa	Nathan, George
Nathanson, Helen	Nativi, Lisa	Nattrass, Suzanne	Nau, Mary Jane	Naue, Judi	Naue, Tom
Naughton, Jodie-kay	Naujokas, Deborah	Nauman, Lee	Nauman, Lorraine	Naumenko, Katerina	Navarro, Adrianne
Navarro, Aurora	Navarro, Eleanor	Navarro, Greg	Navarro, Lisa	Navarro, M	Navarro, Roxanne
Navarro, Yolanda	Navascues, Ana	Naya, DI	Nayer, Tracy	Naylor, Adrienne	Naylor, Alan
Naylor, Brent	Naylor, John	Naylor, Lucas	Ndiaye, Susan	Neal, Alex	Neal, Andrea
Neal, Star	Neal, Tracy	Nealy, Carol	Nearing, Sue	Neathery, Paul	Neave, Jane
Nechama Bomze, Bracha	Nechifor, Talida	Neddo, Lori	Nedza, Elizabeth	Needham, Gail	Needham, Margaret
Needham, Meredith	Neely, Edward	Neely, James	Neely, Matthew	Neering, Leonard	Neff, Alan
Neff, Candice	Neff, Dorothy	Neff, Miriam	Neff, Ray	Neff, Ron	Neff, Steve

Neft, Darrell	Negri, Angela	Negri, Pamela	Nehring, Paul	Nehring, Peter	Neidert, Kathy
Neihart, Janet	Neihart, Joanne	Neill, Georgia	Neill, Laurie	Neill, Shirley	Neill, Theresa
Neill, William	Neiman, Laura	Nelle, Nora	Nelle, Nora	Nelms, Jerry	Nelson, Beatrice
Nelson, Berri	Nelson, Brad	Nelson, Dan	Nelson, Dennis	Nelson, Dorothy	Nelson, Dylan
Nelson, Eloise	Nelson, Erin	Nelson, Fabienne	Nelson, G	Nelson, Jennifer	Nelson, John
Nelson, John	Nelson, Jon	Nelson, Joyce	Nelson, Judith	Nelson, Karen	Nelson, Karyn
Nelson, Katherine	Nelson, Kathleen	Nelson, Kristine	Nelson, Lashea	Nelson, Linda	Nelson, Lynn
Nelson, Marian	Nelson, Marie	Nelson, Marybelle	Nelson, Michael	Nelson, Nanci	Nelson, Paul
Nelson, Peter	Nelson, Richard	Nelson, S	Nelson, Stan	Nelson, Steven	Nelson, Steven
Nelson, Thora	Nelson, TJ	Nelson-ihne, Paula	Nemecheck, Harold	Nemger, Prisca	Nemitz, Naomi
Neperud, Janna	Nepove, Stephen	Nerger, Robert	Neri, Rosanne	Ness, Chris	Ness, Gina
Ness, Sonia	Neste, Lisa	Nestelroad, Kelly	Nester, Chad	Nester, Renee	Nestler, Elizabeth
Nestler, Ryan	Nestor, Janet	Netherland, Rick	Nethers, Jan	Nettesheim, Catherine	Nettler, Maxwell
Netusil, Paul	Neubauer, Karen	Neubert, Christopher	Neuenschwander, Betty	Neufeld, Cynthia	Neufeld, Jane
Neugebauer, Frank	Neumann, Allen	Neumann, David	Neumann, Linda	Neumann, Mary	Neumeister, John
Neus Bradley, Cyndi	Neuschaefer, Kate	Neuschel, Peter	Neuwald, Ruth	Neuzil, Denise	Neves, Deb
Nevin, David	Nevins, Janet	Nevins, Laura	New, Bonnie	Newash, Judith	Newbeck, Phyllis
Newberger, Susan	Newberry, Carla	Newbert, Wendy	Newbry, Dakota	Newcomb, Audrey	Newcomb, Chris
Newcomb, Jacqueline	Newcomb, Jean	Newcomb, Toni	Newcomer, Mary	Newell, Maureen	Newell, Melody
Newell, Scott	Newell, Shirley	Newgent, Susan	Newhard, Jay	Newhart, Kim	Newhouse, Henry
Newhouse, Sandra	Newick, Cyndee	Newkirk, Bill	Newkirk, Catherine	Newkirk, Dorothy	Newkirk, Linda
Newlin, David	Newman, B	Newman, Connie A.	Newman, David	Newman, Donna	Newman, Eric
Newman, Harry	Newman, Hilary	Newman, Hudelle	Newman, Jacqueline	Newman, Kathy B.	Newman, Laura
Newman, Marian	Newman, Peggy	Newman, Ricki	Newman, Roberta	Newman, Suzanne	Newman, Terry
Newmark, Michelle	Newport, Christine	Newport, Michael	Newsom, Dana	Newsom, Robert	Newsome, Alicia
Newton, Ann	Newton, Brooks	Newton, David	Newton, Jessica	Newton, Julia	Newton, Justin
Newton, Sandra	Newton, Terrance	Newton, Tyler	Nez, David	Nezin, Stuart	Ng, Christina
Ng, Linda	Nguyen, Agnes	Nguyen, Bush	Nguyen, Cindy	Nguyen, Cynthia	Nguyen, Dylan
Nguyen, Emily	Nguyen, Giang	Nguyen, Hai	Nguyen, Kim	Nguyen, Tracy	Nguyen, Tuan
Niatum, Duane	Niblack, Janice	Niccolls, Dorothy	Niccolls, Sara	Nichol, Heather	Nicholas, Christa
Nicholas, Laura	Nicholas, Peter	Nicholoy, Susan	Nichols, Barbara	Nichols, Billy	Nichols, Breana
Nichols, Carmen	Nichols, Gail	Nichols, Jason	Nichols, Joshua	Nichols, Kelly	Nichols, Paige
Nichols, Patricia	Nichols, Paul	Nichols, Robert	Nichols, Victoria	Nichols, William	Nicholson, Deborah
Nicholson, Eric	Nicholson, Frederick	Nicholson, Joanne	Nicholson, Katharine	Nicholson, Reed	Nicholson, Sally
Nicholson, Shamus	Nicholson, Simone	Nickell, Marie	Nickels, Stephen	Nickelson, Cecil	Nickle, Paige
Nickolaus, Mary	Nickols, Trudy	Nickum, J	Nicodemus, Sharon	Nicol, Marilyn	Nicolai, Nicola
Nicolaus, Frank	Nicolini, Elizabeth	Nicolls, Gail	Nicolosi, Barbara	Nicolosi, Tina	Nicoud, John
Nieberding, Ron	Nied, Robert	Nied, Scott	Niedzielski, Robert	Niehaus, Nick	Nieland, Thomas
Nielsen, David	Nielsen, Emily	Nielsen, Gregory	Nielsen, Kate	Nielsen, Margo	Nielsen, Meg
Nielsen, Melanie	Nielsen, Melody	Nielsen, Nancy	Nielsen, Steven	Nielson, Greg	Nielson, Ish
Nieman, Kimberly	Niemann, Judith	Niemeyer, Wendy	Niemi, Christine	Niemiec, Richard	Nienaber, Rachel
Niendorf, John	Nierenberg, AL	Nierenberg, Susan	Niermann, Betty	Nies, Randy	Niesen, Andreas
Nieto, Carolina	Nieves, Nellie	Niggle, Kaylynn	Nigh, Jeffrey	Nigh, Larry	Night, Melody
Nightengale, Douglas	Nigro, Jo Ann	Nikchehi, Fatemah	Nikitina, Natasha	Nikkel, William	Niksic, Joyce
Nillissen, Sherry	Nilsson, Derinda	Nilsson, Lena	Nimmons, Rebecca	Nishman, Alan Jody	Nisiewicz, Henry
Niskanen, David	Nisman, Barbara	Nisperos, Stacy	Nitishin, Lawrence	Nitsos, Pamela	Nitti, Joseph
Niven, Mary Lou	Nix, Carol Ann	Nix, Heather	Nix, John	Nixon, Hal	Nixon, Susie
Nizam, Rafa	Nobbman, Margie	Nobel, Susan	Noble, Frank	Noble, Katherine	Noble, Linda Ann
Noble, Lynn	Noble, Roger	Noble, Thomas	Noble, Veronica	Noble, W. F.	Noble, Will
Noblett, Dee	Nocchi, Kelly	Noden, Gail	Noel, Gail	Noel, Lauren	Noel, Letitia
Noga, Carolyn	Noh, Kerry	Nohr, Larry	Nolan, Dennis	Nolan, Heather	Nolan, Jennifer
Nolan, Julie	Nolan, Kieran	Nolan, Nancy	Nolan, Stephen	Noland, Robin	Nole, Zeb
Noll, Toni	Nolte, Joann	Nolting, Sharon	Nommensen, Mary	Noonan, Brittany	Noonan, Dermot
Noonan, Greg	Noonan, Philip	Noordyk, James	Nord, Lisa	Nord, Randall	Nordahl, Richard
Nordberg, Valerie	Nordeman, Valerie	Norden, Chris	Norden, Michael	Norder, Erik	Nordheimer, Mary Ann
Nordhof, Pamela	Nordin, Lillian	Norkus, Edward	Norlander, Peter	Norlin, Terry	Norman, Jennifer

Norman, Mareen	Norman, Marta	Normand, Valerie	Norrigan, Paul	Norris, Betty	Norris, Brenda
Norris, Cynthia	Norris, Jessica	Norris, Kathy	Norris, Linda	Norris, Nancy	Norris, Roger
Norris, Ronnette	Norris, S.	Norris, Scott	Norstedt, Karolina	Norstrom, Florence C.	North, Calvan
North, Connie	North, Diana	North, Ellen	North, Jasmine	North, Maureen	North, Susan
Norton, Elaine	Norton, Emily	Norvell, Tammy	Norville, Burl	Norwalt, Wallace	Norwine, Judith
Norwood, Emily	Norwood, Marijane	Nosnik, Diane	Notaro, Ralph	Notary, Kimberly	Nothmann, Jin
Noto, Nancy	Nott, Jerald	Nottingham, Lois	Nourse, Jeanne	Novack, Aaron	Novak, Angela
Novak, Dale	Novak, Dan	Novak, Jennifer	Novak, Justin	Novella Adoue, Miss	Novick, Christine
Novkov, Russell	Novoa, Michelle	Novotny, Jan	Nowack, James	Nowack, Laura	Nowak, Diane
Nowak, Susanne	Nowakowska, Olga	Nowakowski, Stanley	Nowicki, Maria	Nowicki, Renae	Nowlin, Madison
Noyes, Patrick	Nuccio, Edwina	Nuccio, Sue	Nuckels, Robert	Nugent, Carol	Nugent, David
Nugent, Patrick	Null, Michele	Nulty Jr, Tom	Numrich, Teresa	Nunes, Sharmaine	Nunez, Alix
Nunez, Amado	Nunez, Celia	Nunez, Christopher	Nunez, Jill	Nunez, Kim	Nunez, Louisa
Nunez, Ryan	Nunlist, Kathy	Nunns, D	Nurok, Alison	Nusbaum, Marilyn	Nusbaum, Sue
Nusbaum, William	Nushidatokuno, Diane	Nuss, Morgan	Nussbaum, Kerri	Nute, Michelle	Nutini, Michael
Nutley, Andrea	Nutt, Julie	Nutter, Mary	Nutting, Eric	Nuzzo, Erin	Nye, Diane
Nye, James	Nye, Judy	Nye, Peter	Nygren, Vicki	Nylen, Eric	Nylund, Carl
Nypaver, Michael	Nyquist, Suzanna	Nystrom, Warren	Nyx, Aludra	O' Carroll, Kevin	O' Neil, Chris
O, Firmilian	O, Nancy	O., Jesse	Oake, Susan	Oakes, John	Oakes, Lee
Oakley, Christena	Oarga, Simona	Oaster, Jane	Oates, Judy	Oates, Patricia	Oatman, Chuck
Ob Moyer, B	Oba, Peggy	O'bannon, Janelle	Obarski, Kathleen	Obediah, Maggie	Obeid, Robert
Ober, Dennis	Oberdorf, Renee	Oberfield, Keren/richard	Oberle, Edward	Oberle, Scott	Obermeier, A.
Oberti, August	Obleada, Alvin	Obleness, Greiga	Obolsky, Lenny	Oboyle, Mary Ellen	Obre, Kathleen
O'brien, Beth	O'brien, Beth	O'brien, Cecilia	O'brien, Charles	Obrien, Chris	O'brien, Dennis
O'brien, Eileen	O'brien, Floyd	O'brien, Karen	Obrien, Kathy	Obrien, Kelly	O'brien, Kevin
Obrien, Kris	O'brien, Lori	O'brien, Lynn	O'brien, Matthew	O'brien, Mike	O'brien, Monica
O'brien, Robert	O'brien, Sara	O'brien, Sherri	O'brien, Thomas	O'brien, Tim	Obuab, Ongaub
Obyrne, Cynthia	O'callaghan, Judith	Ocasio, Alfredo	Ocasio, Margaret	Occhino, Alfred	Ocean, Chris
Oceanlight, Barbara	Och, Evelyn	Ochman, William	Ochoa, Caridad	Ochoa, Chemen	Ochoa, Giancarlo
Ochoa, Jesus B	Ochoa, Joan	Ochoa, Victor	Ockuly, Jeffrey	O'connell, Carole	O'connell, Joan
O'connell, Kathleen	O'connell, Ken	Oconnell, Kimberley	O'connell, Renu	O'connell, Rick	O'conner, Samantha
O'connor, Claire	Oconnor, Cornelius	O'connor, Edward	O'connor, Jacqueline	O'connor, Julia	O'connor, Kevin
Oconnor, M	O'connor, Mary Jo	O'connor, Maureen	Oconnor, Patricia	O'connor, Patrick	O'connor, Roy
O'connor, Willa	Oda, John	O'day, Teri	Odden, Steven	O'dea, Martina	Odeh, Amer
Odell, Cynthia	O'dell, Rebecca	Odell, Rollin	Odion, Raven	Odley, Laura	Odom, Barbara
O'donald, Julie	O'donnell, Deanne	O'donnell, Dede	O'donnell, Kevin	O'donnell, Laura	O'donoghue, Clive
O'dowd, John	Oechsle, Ron	Oehl, Gloria	Oelkers, Susan	Oelkers, Yvonne	Oerke Jr, Carl
Oeste, Anna	Oesterle, Maria Elena	Oetker, Heather	Oettl, Tina	Ofeldt, Erica	Offerman, Mark
Officer, Craig	Ogas, Daniel	Ogburn, Catherine	Ogden, John	Ogilvy, Avis	Ogilvy, Heather
Ogle, Emily	Ogonowski, Joel	O'grady, David	Ohanian, Kim	O'hannon, Kyle	Ohara, Jean
Ohara, M	Ohara, Michelle	Ohara, Mike	O'hara, Pat	O'hara, Sharon	Ohara, Tom
Ohayon, Antuanet	O'hearn, Paul	O'hearn, William	O'henley, Danny	Ohland, Andreas	Ohlendorf, Carol
Ohler, Keith	Ohleyer, Stuart	Ohlinger, Nan	Ohlson, Karin	Ohm, P.	Ohm-fisher, Heather
Ohrn, Maria	Ojala, Gregory	O'keefe, Dan	O'keefe, Kerin	O'keefe, Trisha	O'keeffe, Susie
Okelley, Celia	Okerberg, Martha	Okerberg, Paul	Okubo, Audrey	Okvat, Heather	Olasin, Karen
Olcsvary, Michael	Olczak Ii, Robert	Old, Victoria	Oldeg, Margie	Oldenburg, Kaj	Oldham, Kevin
O'leary, Dan	Olenick, Audre	Olenjack, Michael	Olienechak, Amy	Oligmueller, Elizabeth	Olivares, Yvonne
Oliveira, Caroline	Oliver, Betty	Oliver, Bill	Oliver, Bonnie	Oliver, Niles	Oliver, Rachel
Oliver, Rebecca	Oliver, Robert	Oliver, Russel	Oliver, Sarah	Oliver, Stephanie	Olivera, Guido
Oliverborquez, Maureen	Olivieri, Ignacio	Olk, Lamar	Ollmann, Ashlee	Ollove, Steve	Olmez, Justine
Olmo, Orlando	Olmos, Margarite	Olmsted, Charles	Olonia, Joseph	O'loughlin, Kellie	O'loughlin, Leslie
Olsen, Alfa-betty	Olsen, Ambre	Olsen, Andrea	Olsen, Corey E.	Olsen, Dennis	Olsen, Donna
Olsen, Elinore	Olsen, George	Olsen, Priscilla	Olsen, Sandra	Olson Slowik, S	Olson, Beth
Olson, Bruce	Olson, Carl	Olson, Charles	Olson, Christopher	Olson, David	Olson, Dennis
Olson, Derek	Olson, Francis	Olson, George	Olson, Jeffery	Olson, Jenni	Olson, Joanna
Olson, L	Olson, L.	Olson, Linda	Olson, Madeline	Olson, Marilyn	Olson, Mike

Olson, Myrna	Olson, Phillip	Olson, Richard	Olson, Ron	Olson, Sheryl	Olson, Susan
Olson, Wade	Olson-lee, James	Olsson, Teri	Olszanski, Lisa	Oltarzewski, Diane	Olteanu, Michael
Olvera, Blanca	O'malley, Casey	O'malley, Linda	O'malley, Michael	Oman, Barbara	Oman, J.W.
Omann, Geneva	Omar, Rosli	Omohundro, Geri	Omori, Akio	Omstead, Gerry	Onaindia, Carmen
Ondyak, Elizabeth	Oneal, Alice	O'neal, John	Oneal, Laura	O'neal, Nancy	O'neil, Jr, William
O'neil, Patricia	O'neil, Susan	O'neill, Carol	O'neill, David	O'neill, Debi	Oneill, Frances
O'neill, Gwynn	O'neill, Helen	Oneill, Roberta	O'neill, Ryan Patrick	O'neill, Sheila	O'neill, Sue
Onessimo, Dean	Onishi, Wanda	Onken, Brianna	Onofrio, Lisa	Onstott, Rachel	Onysko, James
Ooi, Yu Li	Opfergelt, Robert	Opinsky, Michael	Oppenberg, Gale	Oppenheimer, Lara	Oppenhuizen, Kathy
Oppermann, Carl	Oquinn, Aglaia	Orbach, Dylan	Orchard, Kimberly	Orcino, Jake	Ordal, George
Ordan, Judith	Ordenes, Jonathan	Ordonia, Fel	Orefice, Patrick	Orefice, Stephen	O'reilly, Jason
Oreilly, Karen	O'reilly, Lisa	Oremland, Bradley	Orendain, Virginia	Oresky, Alan	Orgel, Linda
Ori, Randolph	Oriard, Pam	O'rielly, Julie	Oriou, Francoise	Orlando, Dominic	Orleans, Margaret
Orlich, Mary	Orlinski, Patricia	Orloff, Nadyne	Orlow, Mark	Orndorff, Kata	Orndorff, Monica
Orndorff, Robert	Ornee, Mary	Ornelas, Sal	Orner, Karen	Orons, Nancy	Ororuke, K
O'rourke, Dawn	O'rourke, Elene	O'rourke, Kelly	O'rourke, Susan	Oroz, Michelle	Orozco, Angela
Orphanoudakis, Ava	Orr, Andre	Orr, Jenne	Orr, Jerry	Orr, Linda	Orr, Nancy
Orr, Noel	Orr, Robert	Orrange, Mary K	Ortega, Dalyn	Ortega, Lisa	Ortega, Xylia
Ortiz, Bernice	Ortiz, C	Ortiz, Carol	Ortiz, Cici	Ortiz, Clemencia	Ortiz, Daniel
Ortiz, Diego	Ortiz, Gregory	Ortiz, Ivonne	Ortiz, Nicholas	Ortiz, Sebastian	Ortiz, Vanessa
Orvis, Nikki	Ory, Rachel	Orzech, Marsha	Orzel, Jennifer	Osband, Kathryn	Osborn, Carole
Osborn, Julie	Osborn, Kevin	Osborn, Nancy	Osborn, Peter	Osborn, Sue	Osborne, Amanda
Osborne, Hannah	Osborne, Heather	Osborne, Stacey	Oscariz, Aidil	Osgood, Karen	O'shaughnessy, Raymond
O'shea, Kate	Oshea, Shane	Oshiro, Jonelle	Oshiro, Leimamo	Osler, Donna	Osmera, Ben
Ososaka, Okiyo	Osova, Susan	Ospelt, Rita	Osselmann, Kara	Ossenheimer, Merry	Ossipov, Simone
Ostaszewski, John	Ostbo, Amy	Ostby, Trudy	Osteen, Danielle	Osten, Irene	Osten, Mary
Osterhoudt, David	Ostler, Theo	Ostopoff, Christine	Ostrander, Bob	Ostrander, Thorsten	Ostrov, Aerica
Ostrowski, Diane	Ostrowski, Jonathan	Osty, Richard J	O'sullivan, Emily	O'sullivan, John	O'sullivan, Joseph
O'sullivan, Katherine	Osuna, Karla	Osusky, Tony	Oswald, Allan	Oswald, Patricia	Ota, John
Otemba, Nixi	Otero, Jorge	Otis, Anne	O'toole, Christina	Otsuka, Ikuko	Ott, Edward
Ott, Lora	Ott, Timothy	Ottavi, Nancy	Ottaviano, Sara	Ottenbrite, Shelley	Otterstrom, Joyce
Ottiliomaggio, Catherine	Ottinger, Candy	Ottinger, Richard	Ottmer, Jean	Otto, Brian	Otto, Judith
Otto, Lori	Ouchi, Jennifer	Oudeans, Sierra	Ouellette, Joanne	Ouellette, Marcia	Ouellette, Tracy
Ouren, Richard	Ours, Suzanne	Out, Sheila	Outcalt, Jan	Outka, Ann	Outland, John
Overall, Marie	Overbeck, Barbara J.b.	Overbey, Brian	Overby, Gary	Overdier, Ruth	Overholtzer, Pamela
Overland, Julianna	Overman, Rhonda	Overstreet, Rosemarie	Owe, Tanja	Owen, Anna	Owen, Damon
Owen, Debra	Owen, Jacquelyn	Owen, Jean	Owen, Katharine	Owen, Lauren	Owen, Linda
Owen, Lynn	Owen, Pamela	Owen, Penelope	Owen, Sandra	Owen, Tracey	Owens, April
Owens, Beverley	Owens, C	Owens, Diana	Owens, Edward	Owens, Gwendolyn	Owens, Katharine
Owens, Pamela	Owens, Richard	Owens, S	Owens, Sharon	Owens, Sheila	Owens, Theresa
Owens, Tyler	Owings, Terry	Owl, John	Ownby, Mary	Oxenreider Jr, Robert	Oxley, Rhonda
Oxman, Neal	Oye, Paula	Oye, Robin	Oyler, Adrianne	Ozaki, Kendra	Ozawa, Haishin
Ozcan, Mert	Ozeran, H	P, Bob And Carolyn	P, C	P, Erin	P, J
P, Kyle	P, Melissa	P, Ryan	P, Tim	Pabian, Wendy	Pabis, Madeleine
Pabst, James	Pace, Ann	Pace, Melanie	Pace, Scott	Pacheco Theard, Nikki	Pacheco, Candace
Pacheco, Ernest	Pacheco, Patricia	Pacheco, Ricardo	Pacheco, Robert	Pacini, Flavio	Padalino, Gail
Paddock, Nancy	Paden, Donald	Padgett, Arnold	Padier, James	Padilla Diaz, Keops	Padilla, Anita
Padilla, Carlos	Padilla, Edwin	Padilla, Jean	Padilla, Lea	Padmanabhan, Urmila	Paepke, Melissa
Paez, Maria	Pagan, Gail	Pagani, Claudia	Pagano, Maria	Pagar, Anneline	Page, Gail
Page, Michael	Page, Nicholas	Page, Peggy	Page, Robert	Page, Teresa Jeanette	Pagel, Andrew
Pagenkopf, Kris	Pages, Eleanor	Paglia, Victor	Pagliughi, Debra	Pagni, Jean	Pagoulatos, Alexis
Paige, Kim	Paige, Melissa	Paige, Msg, Ronald	Painter, David	Painter, Joanne	Painter, Marilyn
Pais, Gregory	Pais, Julia	Pais, S	Paizante, Lucimar	Pala, Paul	Palacky, Tami
Palanca, Terilyn	Palau, Fleur	Palazzini, Louis	Palecek, Bridget	Palecek, Lynn	Paley, Leon
Palin, Terry	Pallanes, Beatriz	Palm, Lowell	Palmer, Annie	Palmer, Barry	Palmer, Catherine
Palmer, Debra	Palmer, Francis	Palmer, Janelle	Palmer, Janine	Palmer, Jeanne	Palmer, Libby

Palmer, Pohakamalamalama	Palmer, Rebecca	Palmer, Richard	Palmer, Rosemary	Palmquist, Wendy	Palomo, Angelica
Palosi, Brian	Paltin, Sharon	Palumbo, Carmen	Palumbo, Gaetano	Pameijer, Huguet	Pan, Pinkyjain
Pancake, A. Kathleen	Panchy, Gillian	Panciera, Jeffrey	Panciocco, Sammia	Pandey, Preeti	Pandolfi, Sara
Panella, Ruth	Panella, Tom	Panepento, Margaret	Panfilio, Jana	Pang, Angela	Paniagua, George
Panke, Julie	Panko, John	Pannell, Bonnie	Pannone, Alfred	Panny, Christopher	Pantale, Joanne
Pantano, Patricia	Pantazis, Laura	Pantel, Jesus	Pantley, Lisa	Paolazzi, Diane	Paolini, Alessandra
Paoluzzi, Sara	Papa, Joao	Papa, Mar	Papaelias, Philip	Papandrea, Virginia	Papazian, Maria
Papin, Claire	Papineau, John	Papoutsi, Eva	Pappa, Debbie	Pappalardo, Lindajo	Pappano, Allie
Pappano, Rachael	Pappas, Betty	Pappas, Carole	Pappas, Janet	Pappas, Sandi	Pappas, Stephanie
Pappert, M	Paprocki, Douglas	Papscun, Alan	Papworth, Carol	Papworth, Nick	Paquet, Ernest
Paquette, Nicole	Paradis, Bettie	Paradis, Kate	Paradise, Brian	Paradise, Diana	Paras, Katherine
Parbery, Betty	Parcham, Mani	Pardee, Michael	Pardi, Marco	Pareja, Gabriela	Parekh, Jai
Parenti, Noel	Parfitt, John	Pargass, Kavira	Parham, Mary	Parigi, Robin	Paris, Frances
Paris, Michael	Parish, Kim	Parisi Kudlak, Clairemarie	Parisi-shaw, Eleanor	Park, Christy	Park, Kathy
Park, Marshall	Park, Michael	Parker Stellato, Robert	Parker, Alan	Parker, Ashley	Parker, Barbara
Parker, Carol	Parker, Caryn	Parker, Catherine	Parker, Christopher	Parker, Claudia	Parker, Dagmar
Parker, Dan	Parker, Deborah	Parker, Deborah	Parker, Deborah	Parker, Dixie	Parker, Doug
Parker, Elizabeth	Parker, Eric	Parker, Erika	Parker, Evelyn	Parker, F. Grey	Parker, Ina
Parker, James	Parker, Janice	Parker, John	Parker, Kim	Parker, L	Parker, Lance
Parker, Laura	Parker, Leon Ross	Parker, Lisette	Parker, Mary	Parker, Paul	Parker, Paula
Parker, Robert	Parker, Sarah	Parker, Sharon	Parker, Stan	Parker, Susan	Parker, Vaughn
Parker, William	Parkey, C	Parkhurst, Debra	Parkinen, Mitch	Parkins, April	Parkins, Cheryl
Parkins, Janet	Parkinson, Andrew	Parkinson, Doney	Parkinson, James	Parkinson, Mary Kay	Parkinson, Miranda
Parkinson, Robert	Parks, Kevin	Parks, Kristin	Parks, Lisa	Parks, Mariano	Parks, Mary
Parks, Nan	Parks, Nancy	Parks, Rick	Parks, Stephen	Parks, Tracy	Parks, Warren
Parlette, Karen	Parlier, Susan	Parmenter, Annmarie	Parnelle, Wallis	Paro, Roberta	Parr, D. Mark
Parr, Sarah	Parr, William	Parra, Alice	Parra, Angelica	Parran, Robert	Parran, Roxann
Parrington, Colin	Parris, Michelle	Parrish, Caryl	Parrish, Kristen	Parrish, L	Parroitt, Maureen
Parrott, Talulah	Parry, Martha	Parscale, Larry	Parsley, Adina	Parson, Katey	Parsons, Brad
Parsons, Cindy	Parsons, Cindy	Parsons, Judy	Parsons, Leslie	Parsons, Maria	Parsons, Michael
Partin, Nancy	Partridge, Richard	Partridge, Sylvia	Parus, Christine	Parzych, Katrina	Pascal, Robin
Paschke, Vera	Pascoe, Louise	Pasholk, Robin	Pasini, Teresa	Pasko, Peggy	Pasqua, John
Pasqual, Nicholas	Pasquarello, Rosemary	Passanisi, Rosie	Passariello, Nina	Passmore, Judith	Passty, Dr. Jeanette
Pastore, Lori	Pastorino, Gino	Pastos, Nikos	Pastucha, Lori	Pastula, Adam	Pasztor, Kelly
Patch, Frances	Patch, Rashid	Pate, George	Pate, Kara	Pate, Nathan	Patel, Jamshed
Patel, Neil	Patel, Sarosh	Patel, Shamil	Patel, Sunil	Patenaude, Richard	Paterno, Ellen
Paternostro, Carmella	Paterson, Betty	Pathy, Kerry	Paton-smith, Willa	Patoskie, Joseph	Patricia, Jean
Patrick, Beverley	Patrick, Brody	Patrick, Duane	Patrick, Janice	Patrick, Juliana	Patrick, Kay
Patrick, Lauren	Patrick, Leslie	Patrick, Nita	Patrick, Shawn	Patrick, Susan	Patrizzi, Lee
Patsel, Debra	Patten, Robin	Patterson, Alina	Patterson, Barbara	Patterson, Bruce	Patterson, Charlotte
Patterson, Chelci	Patterson, Dale	Patterson, Elizabeth	Patterson, Elizabeth	Patterson, George	Patterson, James
Patterson, James	Patterson, Kasie	Patterson, Katherine	Patterson, Kayce	Patterson, Mandi	Patterson, Nancy
Patterson, Pam	Patterson, Pat	Patteson, Patricia	Patti, Katherine	Pattison, Cody	Pattok, S.L.
Patton, Armand	Patton, Gary	Patton, James	Patton, Julie	Patton, Linda	Patton, Lisa
Patton, Tim	Patton, Trina	Paukert, Sybil	Paul, Adam	Paul, Alana	Paul, Cynthia
Paul, Eleanor	Paul, Kar	Paul, Logan	Paul, Mark	Paul, Nathan	Paul, Raylene
Paul, Tim	Paulesc, Melissa	Paulin, Shawna	Paulin, TY	Paulina, Chris	Pauling, Lynda
Paull, Dennis	Paulos, Judith	Paulsen, Rosemary	Paulsen, Sharon	Paulson, Anne	Paulson, Mervin
Paulson, P	Paulus, Morgan	Pauwels, Anita	Pauzus, Jerry	Pavan, Jacqueline	Pavcovich, Michelle
Paverman, Adriana	Pavillard, Perrine	Pavletic, Terry	Pavlin, Jasmina	Pavlinchak, Carin	Pavlovic, Marko
Pavlovich, Robert	Pavon, Sergio	Pawlen, Nancy	Pawlicky, Renee	Pawlina, Jason	Pawlisz, Patti
Pawlitschek, Jennifer	Pawloff, Ted	Pax, Christina	Paxson, Liz	Paxton, Bobbie And Al	Paxton, Greg
Paxton, Michael	Paxton, Steve	Payne, Adam	Payne, Geneine	Payne, Grace	Payne, Jewel
Payne, Pat	Payne, Phoebe	Payne, Randolph	Payne, Rick	Payne, Sundra	Payumo, Bea

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Peake, Marina	Pearce, Julie	Pearce, Kathleen	Pearce, M.jean	Pearcy, Manuela	Peardot, Wendy
Pearlin, Gina	Pearlman, Margaret	Pearlstein, Karen	Pearson, Cliff	Pearson, John S	Pearson, Kiesha
Pearson, Tara	Pearson, Tia	Pearsons, Lyle	Peary, William	Pease, Diane	Pease, John
Pease, Linda	Peavy, Jerry	Pech, James	Peck, Elizabeth	Peck, John	Peck, Karin
Peck, Pamela	Peck, Rani	Peckinpaugh, Rob	Pecora, Emily	Pecoraro, Daniel	Peddy, Jan
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Pedretti, Patti	Pedroza, Donna	Pedroza, Natalie	Peebles, Linda	Peel, Andrew	Peeples, Ruth
Peer, Ruth	Peeters, John	Peha, David And Julie	Peharda, Kresimir	Peine, Richard	Pekkanen, Lynn
Pekrul, Jeffrey	Pelakh, Susan	Pelch, Rosalie	Pelech, Renee	Pelham, Mark	Pelican, Susan
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Peltzer, Alan	Pelzner, Lauren	Pemberton, Bruce	Pemberton, Donna	Pemberton, Laurie	Pena, Isabel
Pena, Nelson	Pena, Rachel	Pena, Suzanne	Pena, Y.	Penafiel, Carlos	Pence Corallo, Shirley
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Pennington, Greg	Pennington, Juli	Pennington, Terrance	Pennington, Terry	Pennisi, Andrea	Pennock, Ellery
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Perakis, Stephen	Perciado, Anthony	Percival, Barbara	Percy, Patrick	Perdue, Don	Pereira, Ashley
Perenich, Theresa	Pereyra, Carolyn	Perez, Alejandra	Perez, Armando	Perez, Arnulfo	Perez, Arturo
Perez, Carlos	Perez, David	Perez, Jamie	Perez, Jose	Perez, Jose	Perez, Kimberly
Perez, Letty	Perez, Lisa	Perez, Livangelie	Perez, Nancy	Perez, Ricardo	Perez, Susan
Perez, Thomas	Perez-otero, Juan	Perinchief, Jana	Perinetti, Robert	Perini, Sarah	Perk, Dennis
Perkal, Joyce	Perkins, Akankha	Perkins, Cathy	Perkins, Christine	Perkins, Cynthia	Perkins, David
Perkins, David	Perkins, Frances	Perkins, Hannah	Perkins, James	Perkins, Jean	Perkins, Joel
Perkins, Kim	Perkins, Lori	Perkins, Luke	Perkins, Madeline + victor	Perkins, Marie	Perkins, Myrene
Perkins, Robert	Perkins, Ruth	Perkins, Sandra	Perkins, Shannon	Perko, Jack	Perla, George
Perla, Laurie	Perlaki, Jennifer	Perlitsh, Nathan	Perlman, Howard	Perlmutter, Martha	Pero, Beth
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Perry, Joan	Perry, Lee	Perry, Marian Linda M	Perry, Matthew	Perry, Randall	Perry, Rev. Jisho
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Peters, Khaianne	Peters, Matt	Peters, Michael	Peters, Michael	Peters, Rhonda	Peters, Sarah
Peters, Susan	Peters, Suzanne	Peters, Teresa	Peters, Thom	Petersen, Douglas	Petersen, Elizabeth
Petersen, Elsa	Petersen, June	Petersen, Linda	Petersen, Robert	Petersen, Sandra	Petersen, Stein
Petersen, Steven	Petersen, Wayne	Petersen, Wendy	Peterson, Anna	Peterson, Brian	Peterson, Curt
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Peterson, Eloise	Peterson, Janet	Peterson, Jenny	Peterson, Jeremy	Peterson, Joy	Peterson, Karen
Peterson, Kirstin	Peterson, Kristina	Peterson, Lisa	Peterson, Lydie Mae	Peterson, Marci	Peterson, Mary
Peterson, Melissa	Peterson, Merry Ann	Peterson, Michael	Peterson, Mona	Peterson, Nancy	Peterson, Noelle
Peterson, Patricia	Peterson, R.D.	Peterson, Robin	Peterson, Robyn	Peterson, Roger	Peterson, Sandra And Roger
Peterson, T	Peterson, Terry	Peterson, Thomas	Peterson, Tia	Peterson, Tom	Peterson, Tracey
Petipas, Julia	Petit, Patricia	Petitpas, Bethanie	Petlack, Howard	Petrak, Teresa	Petrarca, Emily
Petras, Robert	Petrella, Susan L	Petrequin, Harry	Petri, Sharman	Petricek, John	Petrick, Candy
Petrie, Nelson	Petrilla, J.	Petriwsky, K	Petro, Mary Ann	Petro, Pat	Petroccia, Allison
Petrone, Cheryl	Petroni, John	Petronio, Tony	Petrose, Michael	Petrou, Olga	Petrowski, Todd

Petruccelli, Paul	Petrusa, Susan	Petry, Gabor	Petta, Vincent	Pettersson, Fredrik	Petterz, Adriana
Pettigrew, Mary	Pettit, Carol Ann	Pettit, Duane	Pettway, Keith	Petty, Gina	Petty, Kevin
Petty, Linda	Petzel, Cheryl	Petzold, Ruth	Pew, Don	Peyser, Victoria	Peyton, Jim
Pezzeca, Steven	Pezzotti, Debra	Pfanstiel, Lindsey	Pfeffer, JO	Pfeifer, Dorene	Pfeifer, Ivan
Pfeifer, Nezka	Pfeiffer, Pat	Pfeiffer-rios, Jan	Pfeiler, Nancy	Pfersich, John	Pfister, Anny
Pfister, Gregory	Pflanzer, Howard	Pflug, Carl	Pflug, Valerie	Pflugh, Melissa	Pfoser, Susan
Ph.d.- abd, Ben F. Garcia,	Pham, Chi	Pham, Jeannie	Phan, Bernard	Phaneuf, Stan	Phariss, Loni
Phelan, William	Phelps, Amy	Phelps, Jeanette	Phelps, Michael	Phelps, Tami	Phenicie, Terrie
Phenix, Lisa	Philip, Cecil	Philipp, David	Philipps, David	Philips, Nancy	Philipslund, Claire Kay
Phillip, Tracy	Phillips Iii, E.C.	Phillips, Andrew	Phillips, Anne	Phillips, Bert	Phillips, Charles
Phillips, Cheryl	Phillips, Clifford	Phillips, Dr Cynthia & Paul	Phillips, Elaine	Phillips, Emily	Phillips, George
Phillips, Glenn	Phillips, Heather	Phillips, Hugh	Phillips, Janice	Phillips, Jeffrey	Phillips, Joe
Phillips, Jon	Phillips, Joseph	Phillips, Karen	Phillips, Kirsten	Phillips, Kristin	Phillips, Larry
Phillips, Leona	Phillips, Marcia	Phillips, Marilyn	Phillips, Mark	Phillips, Maura	Phillips, Perry
Phillips, Rhonda	Phillips, Richard	Phillips, Richard & Ethel	Phillips, Sarah	Phillips, Shirley	Phillips, Steven
Phillips, Susannah	Phillips, Suzanne	Phillips, Tanya	Phillips, Traci	Phillips, Weslie	Phillips, William
Philp, Charles	Phipps, Catherine	Phommathirath, Sommai	Pian, Paolo	Pianalto, Frederick	Pianka, Bob
Piascik, Ellen	Piatt, Julia	Piatt, Michael	Piattoly, Nicole	Piazza, Randall	Picard, John
Picard, June	Picard, Susan	Picardi, M.d., Mary	Picarriello, Martha	Piccagli, Kathie	Picchetti, Gloria
Picchioni, George	Piccione, Maryann	Piche, Evelyn	Piche', Joel	Picher, H G	Pichon, Sharon
Pick, Amy	Pickell, Bobbie	Pickens, Michael	Pickens, Mike	Picker, Seth	Pickering, Lori
Pickering, Rachel	Pickett, Don	Pickett, Larry	Pickett, Shelly	Pickettharner, Molly	Pickles, Penny
Piech, James	Piechutzki, Laura	Piehl, Deann	Pienciak, Sue	Pieniazek, Annette	Pieper, Dolores
Pierce, Debbie	Pierce, Diane	Pierce, Dillon	Pierce, Doc	Pierce, Hannah	Pierce, James
Pierce, Kathryn	Pierce, Patrick	Pierce, Stephanie	Pierce, Tanya	Pierce, Taylor	Piercy, Steve
Pierpaoli, David	Pierpont, Nancy	Pierpont, Pam	Pierson, David Curtis	Pierson, Edward	Pierson, Greg
Pierson, Krista	Pierson, Marilyn	Pierson, Stewart	Pierson, Sue	Pierucki, Gatha	Pierucki, Jenny
Piestrak, Bonnie	Pieth, Reto	Pietrasanta, Kathleen	Pietrzak, Darlene	Piette, Michelle	Piette, Rene
Pigford, Terri	Pikala, Christine	Pikala, Molly	Pike, Brian	Pike, David	Piker, T
Pikus, Barbara	Pilak, Tera	Pilato, Ann	Pileidi, Maria	Pilewskie, David	Pilger, Carrie
Pilgram, Maryanne	Pillai, Madhu	Pillar, Bobbi	Pillar, Ina	Pilon, Thomas	Pilson, Jack
Piltch, Sandy	Pilz, Joan	Pina, Denise	Pinales, Melissa	Pinard, Zac	Pinckney, Fritz
Pincus, Arlene	Pincus, Jeffrey	Pinder, Conny	Pinderhughes, Charles	Pine, Joslyn	Pine, Nathanael
Pine, Veronica	Pineau, Ricci	Pineda, Faye	Pineiro, Lisa	Pinezich, John	Pingel, Alva
Pingel, Scott	Pingle, Ray	Pingle, Vikki	Pinkard, Florence	Pinkerton, Anne	Pinkham, Michael
Pinkney, Evan	Pinkston, Paul	Pinneo, Janet	Pinque, Meryl	Pinsof, Robin	Pinson, Amanda
Pinto, Julianne	Pintor, Yvette	Pionca, Rossella	Piper, Lynn	Piper, Pierre	Piper, Steven
Piranty, Donald	Pirie, Cynthia	Pirlot, Diane	Piro, Jeannine	Pirozzoli, Victoria	Pirrone, Annette
Pirtle, Woody	Pisarcik Connolly, Laurie	Piscitelli, Christina	Piscitello, Tiffany	Pisharody, Mohanan	Pisoni, Charlotte
Pistorius, Shelley	Pistrang, Temma	Piszczek, Barbara	Pitcavage, Michael	Pitcher, Brent	Pitka, Lily
Pitkin, Claire	Pitkin, Daniel	Pitkin, Mary	Pitman, David	Pitman, Maryann	Pitt, Jon
Pitt, Mary	Pitt, Michael	Pittluck, Denise	Pittluck, Richard	Pittman, Charles	Pittman, Jawara
Pittman, Jennifer	Pittman, Jennifer	Pitts, Frank	Pitts, Jacquelyne	Pitts, Katie	Pitts, Ken
Pitts, Shannon	Pitts, Teresa	Pivacek, William	Piwowar, Carol L	Pizarro, Claudia	Pizzardi, Marilyn
Pizzo, J	Place, J	Plagmann, James	Plaisted, Ann	Plaister, Deane	Planes, Gene
Plank, Beverly A	Plank, Deeann	Plant, Chaz	Plant, Mary Ann	Plantemoli, Bernadette	Platizky, Franklin
Plato, Mara	Platt, Heather	Platt, Luke	Platt, Patricia	Platter-rieger, Mary	Plaviak, Beverly
Plavko, Kathy	Plaxen, Barry	Plaza, Carmen	Pleasant, Kendall	Pleau, Cindy	Plecko, Emil
Plichta, Alan	Pliner, Elliot	Plishka, Debra	Plomasen, Jim	Plonski, Conrad	Ploss, Norm
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Plumlee, Ralph	Plumley, Constance	Plummer, Gary	Plummer, Ronald	Plumpton, David	Plunkett, Frances
Plunkett, Robert	Pluta, ED	Pluta, Nancy	Plymale, Denise	Pober, Andrew	Pocekay, Dennis

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Poehlmann, Penelope	Poehner, R. David	Poen, Becky	Poff, Carol	Pogel, G	Poggi, Pat
Pohl, Barbara	Pohorylo, Erast	Poikonen, Todd	Poinelli, Carolyn	Pointer, Jackie	Pointer, Nancy
Poist, Ellen	Pokorny, Dennis	Pokorny, Tamara	Polainer, Jorie	Polanco, Edgar R.	Poland, Marjorie(toni)
Polaner, Terry	Polansky, Joseph	Polaski, Kathie	Polczynski, Jamie	Polesky, Alice	Polesnak, Bil
Poli, Christopher	Polichak, James	Polichak, Jim	Polidori, Marguerite	Poliseo, Donna	Politis, Hilary
Polito, Gene	Polito, Nancy	Politte, Melina	Politzer, Andrew	Polk, Sandra	Pollack, Julie
Pollack, Michael	Pollak, Jeannie	Pollak, Tom	Pollard, Kelli	Pollard, Martha	Polley, Daniel
Polley, Joann	Pollock, Joseph	Pollock, Robert	Polsdofer, Nancy	Polson, Karen	Polterzisky, Stephen
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Polzin, Michael	Pomerance, Diane	Pomerleau, Catherine	Pomeroy, James	Pomeroy, Kimberly	Pomianowski, Irene
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Pope, Michael	Pope, Sarah	Popiel, Paul	Popielarczyk, ED	Popielaski, John	Popodi, Ellen
Popoli, Jenna	Popolizio, Carlo	Popovac, Gwynn	Popp, Jennifer	Popp, Joseph P	Poppenk, Rita
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Porter, Denise	Porter, Jan	Porter, Janice	Porter, Joelle	Porter, Kathleen	Porter, Linda
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Poselwait, Matthew	Posey, William	Poskiene, Lina	Poss, John	Post, Cynthia	Post, Fran
Post, Jenni	Post, Timothy	Postiglione, Edie	Postma, Wendi	Poston, Cindy	Poston, James & Shelley & Elise
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Potkay, Joan	Potocnik, David	Potter, Brandon	Potter, Christopher	Potter, Dan	Potter, Dianne
Potter, Eric	Potter, Fran	Potter, Jeannine	Potter, Jill	Potter, Robert	Pou, Tessa
Poulas, Caroline	Poulson, Judi	Poulton, Marijane	Pounds, Bonnie	Pounds, Yvette	Povlock, Karen
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Powell, Ellen	Powell, Ethel	Powell, Isabel	Powell, Jaxs	Powell, Jeanne	Powell, Lance
Powell, Michael	Powell, Peggy	Powell, Sara	Powell, Sharon	Powell, Stephen	Powell, William
Power, Christina	Power, Cynthia	Power, Kathie	Powers, Annette	Powers, Cynthia	Powers, James
Powers, Janice	Powers, Jim	Powers, John	Powers, John	Powers, Laurel	Powers, Linda
Powers, Mary	Powers, Molly Rose	Powers, Nancy	Powers, Nancy	Powley, Carol	Powley, Kent
Poyant, Andrew	Poyezdala, Todd	Poynter, Debora	Prados, Danielle	Prairie, Annemarie	Praprotnik, John
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Pratt, Debra	Pratt, Marvin	Pratt, Rebecca	Pratt, Ted	Pratt, Yvonne	Pray, Dareth
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Preli, Maryanne	Prellwitz, Carl	Prellwitz, John	Prentice, Kelley	Prentiss, Barry	Prescott, Jennifer
Presley, Michael	Presswalla, Kamla	Preston, Lynne	Preston, Megan	Preston, Michelle	Preston, Tony
Prestridge, Laura	Prete, Michael	Pretre, Grace	Preuss, Ginnie	Prevost, Jennifer	Prexl, Esther
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Price, Charles	Price, Charles	Price, Elisabeth	Price, Gayle	Price, Heather Whitney	Price, Isabella
Price, Joseph	Price, Judy	Price, Kent	Price, Lauren	Price, Laurie	Price, Linda
Price, Lorraine	Price, Lynn	Price, Mara	Price, Mary	Price, Mary Ellen	Price, Michael
Price, Michele	Price, Natalie	Price, Sandra	Price, Sara	Price, Tyler	Price-feinstein, Iona
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Primack, Gretchen	Primrose, Magdeline	Prince, Annie	Prince, Erin	Prince, Monica	Prince, Noelle
Pringle, Michael	Prinz, Johni	Prinz, Johni	Pritchard, Alvera	Pritchard, Diane	Pritchard, Holly
Pritchard, Joan	Pritchard, Julie	Pritchard, Mary	Pritchard, Roger	Pritchard, William	Pritchett, M.
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Prochazka, Penelope	Proctor, Chris	Proctor, Steve	Proffitt, Brenda	Projansky, Emily	Prol, Candela
Promersberger, Austin	Pronchick, Cheryl	Propen, B	Proplesch, Suzanne	Prosperie, Johnnie	Prosser, Andrew

Prostko, Linda	Proto, Mike	Prout, Jamie	Provance, Donna	Provance, Philip	Provenzano, Pierina
Province Of The Helpers Of The Holy Souls, Laetitia	Provinzano, Paul	Provost, Clifford	Provost, Ramona	Provost, Ruth	Provost, Todd
Prow, Steven	Prudhomme, Joshua	Pruitt, Geoffrey	Prum, Katherine	Pruna, Daniel	Pruneau, Pauleanne
Prushinski, Robert	Pruvot, Christine	Prybylski, John	Prycer, Donald	Prychodko, Nicholas	Pryich, Ann
Pryor, Diane	Pryor, Lauralyn	Psaras, Brenda	Ptrez, Carmen	Puaoi, Richard	Public, Jean
Puca, Laurie	Puca, Robert	Pucarelli, Miles	Pucci, Joshua	Puchalski, H	Puchli, Robert
Puckett, Diane	Puentes, Steph	Puerta, Jeanne	Puett, Barbara	Puffenberger, Mary	Pugh, Debi
Pugliese, Maria	Puglisi, Jeff	Pugmireskidmore, Christine	Pujals, Joaquim M.	Pula, Monica	Pule, Pamela
Puleo, Joe	Puleo, Ronald	Pulford, Joe	Pullara, Ryan	Pullaro, Barbara	Pullen, Jennifer
Pullen, Shirley	Pulleva, Evelina	Pulliam, Karen	Pumel, Shaun	Pumphrey, Eugene	Punday, Nicole
Punneo, Sheryll	Puno, Ethel	Puntch, Ann	Puppione, Greg	Purcell, Jennifer	Purcell, Karen
Purcell, Rebecca	Purdue, Bill	Purdue, Joyce	Purdy, Jan	Purdy, Shawna	Purucker, Susanna
Purviance, Patricia	Purvis, Inken	Pusch, ED	Pusel, Joyce	Pusey, Caleb	Putman, Laura
Putrelo, Michael	Putrich, Stev	Putze, Michelle	Pyle, Jeremy	Pyles, David	Pyles, Shane
Pysher, Paul	Pyun, Lydia	Qadeer, Umair	Qira, Meliha	Qolas, P.J.	Quach, Namphuong
Quadretti, George	Quagline, Donna	Quail, Bob	Quail, Karen	Quaintance, Joel	Quaintance, Margaret
Quaritius, Karen	Quarles, Neil	Quarrick, Robert	Quartararo, Lisa	Quast, Deborah	Quatrano, Barbara
Quattlebaum, Matt	Quay, Pamela	Quell, Larry	Quenan, Joan	Querze, Susan	Quesada, Gloria
Quezada, Jessica	Qui, Susie	Quiatt, Peggy	Quick, Jennifer	Quickel, Kye	Quiet, Natalie
Quigg, Catherine	Quigley, Edwin	Quigley, Jennifer	Quigley, Louise	Quilenderino, Yvonne	Quillen, York
Quilligan, Deb	Quillin, Michael	Quilty, Chuck	Quimby, Christopher	Quince, Rohan	Quindo, Marilyn
Quinn, Amanda	Quinn, Amanda	Quinn, Barbara	Quinn, Clark	Quinn, Edythe Ann	Quinn, Joan
Quinn, Joan	Quinn, John	Quinn, Joseph	Quinn, Luther	Quinn, Paul	Quinn, Sherry
Quinn, Terry	Quinn, Tracey	Quinones, Carla	Quinones, Marcelo	Quinones, Monica	Quint, Carol
Quintana, Harriett	Quintana, Katarine	Quintana, M	Quirk, Austin	Quirk, Jessica	Quiroz, Patrick
Quistorff, Mary	Quistorff, Ned	Quon, Marjorie	Qurashi, Sheeza	R, Anthony	R, B
R, C	R, Craig	R, Dina	R, Fran	R, Irene	R, Jennifer
R, Sandra	R, Sybil	R., A	R., Andrew	R., Guine	Ra, Mohammed
Raab, Frances	Raamot, Patricia	Raasch, Carolyn	Rabanit, Bruce	Rabb, Sharon	Rabby, Russell
Rabe, Erika	Rabeuf, Katherine	Rabey, Julie	Rabin, Hannah	Rabin, Keith	Rabin, Pat
Rabinowitz, Rebecca	Rabjohns, Tracey	Rabl, Gerald	Rabon, Joyce	Rabow, Harli	Raby, Elizabeth
Raby, Kevin	Raby, Teddy	Racanelli, Tom	Raccio, Karen	Rachal, Michael	Rachleff, Ettie
Racine, Bob	Racine, Susan	Racketa, Martha	Rackley, Giselle	Radbod, Yasmin	Radek, Kent
Rader, Ann	Rader, DL	Rader, Jan	Radford, Lemoine	Radic, Vedran	Radicke, Rolf
Radko, Danuta	Radley, Ann	Radley, Dena	Radley, Erika	Radoccia, Judy	Radtke-rosen, Ian
Radulescu, Emily	Radun, Wendy	Radwany, Julia	Rae, Beverly	Rae, Michele	Rae, Michele
Raff, Elaine	Raffael, Jos	Rafferty, John	Rafferty, Kathleen	Rafferty, Paul	Raffetto, Christine
Rafiq, Eman	Ragalyi, Sarah	Ragan, Kathleen	Raghavan, Gopal	Ragland, Harrison	Ragland, Joan
Rago, Francesca	Ragon, Randy	Ragsdale, Billy	Ragsdale, Lisa	Ragsdale, Mary	Ragsdale, Matthew
Raha, Cynthia	Rahbari, Carol	Raheem, Raheemah	Rahilly, Linda	Rahman, Mohammad	Rahman, Zainool
Rahmani, Mariam	Raiber, Anthony	Raible, Annette	Raich, Denise	Railsback, Kathryn	Rainbolt, Aaron
Rainbolt, James	Rainey, Peggy	Rainforth, Danielle	Rains, Lori	Rains, Pamela	Raisch, Dan
Raiser, A. Lynn	Raisky, Kat	Raith, Frank	Raitt, Jacob R.	Rajan, Sara	Rajki, Arpad
Raley, Deborah	Rall, Carol	Rall, Kristin	Ralph, Carol	Ralph, Cecil	Ralph, Karin
Ralph, Kathleen	Ralston, Aron	Ralston, Charles	Ralton, E	Ram+¡rez, Juan	Ramaci, Lisa
Ramamurthy, Arakalgud	Ramauro, Michelle	Rambo, Reno	Rambow, Rosemary	Ramdin, Aliyah	Ramey, Abagail
Ramey, Phillip	Raminski, Len	Ramirez, Armando	Ramirez, Darla	Ramirez, David	Ramirez, Esteban
Ramirez, Judith	Ramirez, Lorance	Ramirez, Lydeen	Ramirez, Marci	Ramirez, Richard	Ramirez, Robyn
Ramirez, Rosalinda	Ramirez, Silvia	Ramirez, Uberlinda	Ramm, M.K.	Rammel, Vicki	Ramo, Carol
Ramon, Laura	Ramos, Allysa	Ramos, Annette	Ramos, Debbie	Ramos, Erica	Ramos, Guillermo
Ramos, Jaime	Ramos, Malia	Ramos, Marlon	Ramos, Paul	Ramos, Silvia	Ramos, Xavier
Ramos, Yeniffer	Rampi, Philip	Ramquist Wesson, Katrina	Ramsay, Colin	Ramsden, Charlene	Ramsey, Cristina
Ramsey, Cynthia	Ramsey, Judith	Ramsey, Kerry And Beth	Ramsey, Patricia	Ramsey, Philip	Ramsey, Walter

Ramstrom, Eric	Rand, Susan	Randall, Corinne	Randall, David	Randall, Donald	Randall, Dorene
Randall, Heather	Randall, Katrazyna	Randall, Kay	Randall, Mary R	Randall, Matt	Randall, Melinda
Randall, Victoria	Randazzo, Isabella	Randell, Monica	Randerson, Susan	Randle, John	Randolph, Anne
Randolph, Dee	Randolph, Dieter	Randolph, Karen	Randolph-frey, Susan	Randow, Alex	Raney, Gary
Raney, Jonathan	Range, Lauren	Rangel, Giovana	Rangnow, Margaret	Ranheim, Judith	Ranii, Mary
Rankin, Susan	Ranney, Robert	Ransom, Jeffery	Ranstrom, Patricia	Ranta, John	Ranusch, Carolyn
Ranvig, Eric	Rapalyea, Angela	Raphael, Alexis	Raphael, Joan	Rapice, Robert	Rapp, Lauren
Rappaport, Alexandra	Rappaport, Barbara	Rappe, Debra	Rappe, Ellen	Rappe, Leonard	Rapplean, Tiffany
Rapport, Charles	Rarden, Lauren	Rarick, Karen	Rasbury, Patricia	Raschiatore, Lorraine	Raschke, Wendy
Rashkow, Angelika	Rashkow, Robert	Rasmussen, Han	Rasmussen, Jeanne	Rasmussen, Margaret	Rasmussen, Mckenzie
Rasmussen, Paul	Ratan, Mehak	Ratchford, Jane	Ratcliffe, Thomas	Rathbone, Marjorie	Rathbun, Craig
Rather Medina, Judy	Rathke, Kyme	Ratjen, Charles	Ratkovsky, Greg	Ratliff, Cynthia	Ratliff, Debbie
Ratliff, Joe	Ratner, Ron	Ratschkowsky, Kris	Rattan, Myra	Rattanawong, Sathaphon	Ratti, Bridget
Rattner, Jeffrey	Rattner, Ron	Rauch, Sequoia	Raucher, Diane	Raughley, Brad	Rauh, Sabine
Raupfer, Sandra	Raupkounovsky, Pamela	Rauscher, Bruce	Rauscher, Mark	Raven, Alice	Raven, Jackie
Raven, Resa	Raven, Robert	Raveney, Michael	Ravenfox, Caroline	Ravenscraft, Conall	Ravenscraft, DH
Ravenstein, Kathleen	Ravishankar, Mekala	Rawl, Francie	Rawl, Mary	Rawlett, Beverly	Rawline, Sandra
Rawlins, Lori	Rawls, Davian	Ray, Bobby	Ray, Bridget	Ray, Ellen	Ray, Gigi
Ray, Glenda	Ray, Jennifer	Ray, John	Ray, Leslie	Ray, Linda	Ray, Michael
Ray, Sharon	Ray, Susan	Ray, Tom	Raybeck, Alethea	Rayburn, Blake	Rayburn, Hunter
Raychaudhuri, Sumana	Raymond, Amanda	Raymond, Bruce	Raymond, Danielle	Raymond, Danielle	Raymond, Debra
Raymond, Mike	Raymond, Monica	Raymond, Timothy	Raynis, Beth	Raynor, Margaret	Razo, Tiffany
Rea, Carmen	Rea, Corde	Read, Don	Read, Donna	Read, Helen	Read, Jon
Read, Seth	Reade, Deborah	Reader, Mary & Rev. Robert	Reader, Stephanie	Reading, Jane	Reagan, Ann
Ream, Donna	Ream, Tarn	Reame, Jen	Reardon, Matthew	Rearigh, Elsie	Reasons, Jo And Joe
Rebb, Daniel	Rebel, Jacqueline	Reble, Debra	Recore, Erin	Rector Jr., Carson	Rector, Crystal
Reda, Patricia	Redden, Michaela	Reddoch, Barbara	Reddy, Shambhavi	Rede, John	Reden, Stephen
Redick, Mary	Rediger, Nancy	Redinger, Janice	Redling, John	Redman, Isela	Redman, Julie
Redman, Sandi	Redmansmith, Joanna	Redmon, Lorri	Redmond, Cameron	Redmond, Lissa	Redmond, Rhonda
Redvievs, Margaret	Redwillow, Joyce	Redwine, Isobel Anne	Ree, Peter	Reece, Ray	Reed Nelson, J
Reed, Andrea	Reed, Claudia	Reed, Dirk	Reed, Ehben	Reed, Gregory	Reed, Kelly
Reed, Larry	Reed, Lisa	Reed, Liz	Reed, Lola	Reed, Mary	Reed, Mary
Reed, Mary	Reed, Megan	Reed, Patricia	Reed, Robert	Reed, Robert M/carol G	Reed, Ronald
Reed, Ruth	Reed, Sheryl	Reed, Stephanie	Reed, Stephen	Reed, Terri-beth	Reed, Wrenn
Reed-auld, Anika	Reeder, Betsy	Reeder, Christine	Reedy, Boyd	Reedy, Stacy	Reegen, Andrew
Reel, Joseph	Reep, Irene	Reer, Lynn	Rees, Collin	Rees, Donna	Rees, Hannah
Rees, Les	Rees, Michael	Rees, Samuel	Reese, Alex	Reese, Bob	Reese, Brian
Reese, Gary	Reese, Michele	Reese, Michele	Reese, Pat	Reese, Robert	Reeve, Sharon
Reeves, Bailey	Reeves, Glenn	Reeves, Joyce	Reeves, Lenore	Reeves, Reeves	Reeves, Rev Charles
Refai, Warood	Refvik, Eric	Regan, Alex	Regan, Evelyn	Regan, Lyn	Regan, Mike
Regan, Nora	Regen, Hamilton	Regenhard, Christina	Regez, Hendrica	Reginato Jr, Louis	Regnart, Susanne
Rego, James	Rego, Sonia	Regueiro, Alexander	Regusis, Anthony J.	Rehagen, Marirose	Rehberger, Lena
Rehm, Carolynne	Rehm, Karen	Rehn, Kira	Rehne, Veronica	Reibstein, Karen	Reich, Bianca
Reich, Jill	Reichard, Stacie	Reichert, David	Reichle, Kurt	Reichmann, Peter	Reichter, Susan
Reid, Brian	Reid, David	Reid, Edward	Reid, John	Reid, Karen	Reid, Linda
Reid, Lucia	Reid, Matthew	Reid, Sarah	Reider, Mike	Reid-lezotte, Nora	Reidy, Katherine
Reidy, Thomas	Reidy, Thomas	Reiff, S	Reiff, Suzanna	Reifke, Kathleen	Reifschneider, Jill
Reigel, Janet	Reigle, Michelle	Reigner, Leisha	Reiher, Linda	Reik, Linda	Reikes, Andrew
Reilly, Deb	Reilly, Emma	Reilly, Linda	Reilly, Mary	Reilly, Misty	Reimann, Martin
Reimel, Beth	Reimer, Robert	Reimers, David	Reinartz, Amy	Reinberg, Donald	Reinders, Phd, Sophia
Reindollar, Elizabeth	Reiners, Carl	Reinfried, Kay	Reinhardt, Jason	Reinhart, Robert	Reinhart, Robin
Reinholdt, Sally	Reinman, Fred	Reinman, Suzanne	Reis, Jenni	Reis, Shirley	Reischl, Terri
Reischman, Ruth	Reise, Elaine	Reiseck, Lynore	Reiser, Beata	Reiser, Kathy	Reisley, Roland
Reisman, Jancarol	Reisman, Rita	Reisner, Kait	Reiss, April	Reiss, Wayne	Reiter, Doris

Reitz, James	Reitz, Petra	Relis, Iris	Rembold, Venice	Remde, Lisa	Remily, Myra
Remkus, Ann	Remley, Jon	Remmich, Timber	Remy, Deborah	Remy, Linda	Renard, Mary
Renardson, Fay	Renardson, Wayne	Renaud, Dave	Rendall, Beth	Rendigs, Kim	Rendina, Lori
Rendoni, Piero	Reneau, Avis	Renehan, Janet	Renfro, Robert	Rengers, Edward	Renken, Norah
Renn Parker, Lori	Renne, Karen	Renner, Cate	Renner, Kendra	Renner, Kendra	Renninger, Jonathan
Renouf, Hester	Renshaw Jr, Bob	Renton, Edie	Renzoni, Dan	Reola, Matthew	Repp, Kathy
Reppa, Douglas	Reppert, Carol	Reppun, Thomas	Reppy, Michael	Resca, Olivier	Resende, Carolyn
Reser, Kate	Resh, Brian	Reshetnik, Michael	Resin, Robin	Resnick, Mark	Respass, Jen
Ress, Denise	Resseguie, William	Restly, Betsy	Restrepo, Juan David	Reszat, Beatrice	Retherford, Charles
Retherford, Ethan	Retherford, Kathy	Rettig, James S.	Retzer, Everett	Retzler, Michelle	Revesz, Bruce
Revilla, Laura	Rex, Peter	Rex, Teresa	Rexin, Tim	Rexrode, Earl	Rey, Christiane
Rey, Martin	Reyell, Sarah	Reyes, Blaine	Reyes, Maria	Reyes, Teresa	Reyna, Reynaldo
Reynolds, Andrea	Reynolds, Ann	Reynolds, Colleen	Reynolds, Daniel	Reynolds, Dolores	Reynolds, Elizabeth
Reynolds, Fatimah	Reynolds, Jane	Reynolds, Jed	Reynolds, Jessica	Reynolds, Jim	Reynolds, Jonelle
Reynolds, Kathryn	Reynolds, Kelli	Reynolds, Ken	Reynolds, Linda	Reynolds, Lisa May	Reynolds, Lloyd
Reynolds, Mary	Reynolds, Michele	Reynolds, Miriah	Reynolds, Neal	Reynolds, Om Devi	Reynolds, Peter
Reynolds, Ray	Reynolds, Renee	Reynolds, Ronda	Reynolds, Scott	Reynoso, Julian	Rhea, Tina
Rhee, Judy	Rhein, Herman	Rhine, Wallace	Rhinehart, Keith	Rhoades, Joseph	Rhoades, Rick
Rhoads, Kirk	Rhodes Iii, Robert W.	Rhodes, Charlene	Rhodes, Joanne	Rhodes, Joseph	Rhodes, Lee
Rhodes, Shannon	Rhodes, Steven	Rhodes, Thomas	Rhue, Dean	Rhyme, Jennifer	Rhyne, David
Rhyno, Travis	Rhynsburger, Mark	Rhys, Saeran	Rials, J.	Riane, Diana	Riblett, Susan
Ricardo, Julian	Ricca, John	Ricci, Anthony	Ricci, Mark	Ricci, Steve	Ricciardi, Anthony
Ricciardi, Lori	Riccio, Eileen	Rice, Ann	Rice, Betsy	Rice, Christina	Rice, Cynthia
Rice, Donna	Rice, Doug	Rice, James	Rice, Karen	Rice, Kathleen	Rice, Michael
Rice, Michelle	Rice, Miriam	Rice, Ocea	Rice, Rebecca	Rice, Sally	Rice, Sharon
Rice, Shay	Rice, Tim	Rice, Wyman	Rice-coughlan, Virginia	Ricelaurir, Lauri	Rich, Dave
Rich, Erin	Rich, Grant	Rich, Roberta	Rich, Sharon	Richard, Charles	Richard, Isabelle
Richard, Susan	Richardamato, Patricia	Richards, Barbara	Richards, Barrie	Richards, Deborah	Richards, Galina
Richards, Gwen	Richards, John	Richards, Judy	Richards, Kimberly	Richards, Lawren	Richards, Martha
Richards, Michael	Richards, Paul	Richards, Peggy	Richards, Robyn	Richards, Steven	Richards, Susan
Richardson, Anne	Richardson, Bonnie	Richardson, Cheri	Richardson, Chrystie	Richardson, Erin	Richardson, Georgetta
Richardson, Hobert	Richardson, Jeffrey	Richardson, John	Richardson, June	Richardson, Katherine	Richardson, Kimberly
Richardson, Leslie	Richardson, Meredith	Richardson, Michael	Richardson, Peggy	Richardson, Sarah	Richardson, Teresa
Richardson, Vicki	Richart, Pamela	Richcreek, Geoff	Richcreek, Nathalie	Richert, Adele	Richey, Michael
Richey, Sylvia	Richie, David And Janice	Richie, Lauren	Richman, Kate	Richmond, Chey	Richmond, Linda
Richmond, Lonna	Richmond, Mark	Richmond, Pamela	Richmond, Rebecca	Richner, Claudia	Richter, Darcy Dean
Richter, Richard	Richter, Virginia	Rick, Chet	Ricka, Anita	Rickard, David	Rickard, Louise
Rickels, Amy	Rickenbach, Deborah	Ricketts, Philip	Ricklefs, Robert	Rickson, Dan	Riddell, Corielle
Ridder, Lynette	Riddle, Carolyn	Riddle, Dagmar	Riddle, Phd, Jd, James	Riddle, Ryan	Riddle, Tammie
Ridenhour, Patricia	Ridenour, Carolyn	Ridenour, Martin	Rideout, Annette	Rideout, Carol	Rideout, James
Rider, Alan	Ridgeway, Bill	Ridgeway, Jonathan	Ridgway, Kathi	Ridgway, Melba	Ridgway, Sarah
Riebel, Linda	Rieber, Susan	Rieckmann, David	Riedel, Sara	Riedel, Susan	Riederer, Christiane
Riedman, Laura	Riegle, Janice	Riehart, Dale	Riek, Paul	Riekert, Martin	Riekki, Laurice
Riera, Anna Mari	Ries, Amy	Ries, Paul	Riesenkampff, Ingrid	Riester, Maggie	Rietz, Marguerite
Riff, Christopher	Riffle, Julie	Rigano, Kimberly	Rigau, Felix	Rigby, Cheryl	Riger, Richard
Rigg, Diana	Rigg, Vivian	Riggins, Marilyn	Riggins, Tom	Riggs, Sandra	Rigney, J
Rigsby, Cathi	Riker, Elisabeth	Riley, Barbara	Riley, Callie	Riley, Kari	Riley, Kathleen
Riley, Kevin	Riley, Laura	Riley, Mary	Riley, Melanie	Riley, Melinda	Riley, Melissa
Riley, Michael	Riley, Nancy	Riley, Stuart	Riley, Thomas	Riley, Tracy	Rilling, Fred
Rim, Alice	Rimawi, Amal	Rinaldi, Margaret	Rinard, Gilbert	Rincon, Anna	Rincon, Clara
Rincon, D.	Rindler, Joseph	Rinehart, Vicki	Rinehart, Wendy	Rines, Lora	Rinesmith, Judith
Ring, Geraldine	Ringgaard, Line	Ringle, Alan	Ringle, David	Ringler, Diane	Ringler, Thomasin
Ringwald, C. James	Rinkenberger, Nancy	Rintoul, Micheal	Rintzler, Harel	Riordan, Janet	Riordan, Ruth
Rios, Elisa	Rios, Jennifer	Ripa, Johnna	Ripeckyj, G. Yuri	Riphenburg, Dennis	Ripka, Bryan
Ripley, Paul	Ripley, Virgil	Ripp, Russ	Ripplinger, George	Ripsam, Stefan	Risacher, Barbara

Rise, Shankari	Riser, Carol	Rising, C	Risjey, Lisa	Rissberger, Maryjane	Ristvedt, Shawn
Ritchie, Greg	Ritchie, Shann And Dennis	Ritchings, Anne	Ritrovato, Jesse	Ritscher, Jim	Ritter, Lynn
Ritter, Philip	Ritts, Cierna	Ritzel, Stephen	Riva, Paul	Riva, Vero	Rivalsi, Douglas
Rivard, Kathleen	Rivard, Renee	Rivas, Lenika	Rivas, Levi	Rivendell, Laura	Rivenes, Barbara
Rivera, Claudia	Rivera, Emma	Rivera, Javier	Rivera, Luis	Rivera, Manuel	Rivera, Mary
Rivera, Melissa	Rivera, Robert	Rivera, Rose	Rivera, Santos	Rivera, Zachary	Rivero, Renata
Rivers, Dianna	Rivers, R	Rives, Douglas	Rivesdenight, Susan G	Rizzi, Gaetano	Rizzo, Richard
Rizzuto, Angela	Roache, Nicholas-jason	Roarke, Jim	Roaten, Doug	Rob, Sam	Robards, Lewis
Robbins, Alice	Robbins, Elanor	Robbins, Jacob	Robbins, Joan	Robbins, Julie	Robbins, Karen
Robbins, Mark	Robbins, Mary	Robbins, Pam	Robbins, Sandina	Robbitts, Theresa	Roberge, Manon
Roberson, Gracie	Roberson, Marsha J Holbert	Roberson, Pat	Robert, Gregory	Roberto, Julia	Roberto, Robert
Roberts, Alicia	Roberts, Amanda	Roberts, Barbara	Roberts, Barry	Roberts, Celia	Roberts, Donna
Roberts, Elizabeth	Roberts, Fiona	Roberts, Gail	Roberts, Gretchen	Roberts, Harriet Edith	Roberts, Jan
Roberts, Janet	Roberts, Jean	Roberts, Jessica	Roberts, Laney	Roberts, Les	Roberts, Linda
Roberts, Mark	Roberts, Martha	Roberts, Michael	Roberts, Nancy	Roberts, Rob	Roberts, Robby
Roberts, Ronald	Roberts, Sedona	Roberts, Sherri	Roberts, Stacy	Roberts, Tom	Roberts, Valerie
Roberts, Virginia	Roberts, William	Robertsmoneir, Nancy	Robertson, Larry And Barbara	Robertson, Michael	Robertson, S.
Robertz, Ela	Robey, Steve	Robichaud, David	Robichaud, Phyllis	Robicheau, Gail	Robie, Stephen
Robin, Andrew	Robin, Georgette	Robins, Becky	Robins, Kristen	Robins, Rick	Robinson, Adeline
Robinson, Anne	Robinson, Brittney	Robinson, Caitlin	Robinson, Dameta	Robinson, Daniel	Robinson, Darrell
Robinson, Eric	Robinson, Gail	Robinson, Gerald	Robinson, Harold	Robinson, Jacqueline	Robinson, Jan
Robinson, Janet	Robinson, Jean	Robinson, Jeanne	Robinson, Jerily	Robinson, Jerry	Robinson, John
Robinson, Joseph	Robinson, Judith	Robinson, Karen	Robinson, Kate	Robinson, Kathy	Robinson, Kay
Robinson, Khristine	Robinson, Lee	Robinson, Lynda	Robinson, Marcia	Robinson, Michael	Robinson, Mike
Robinson, Norris	Robinson, Pamela	Robinson, Pat	Robinson, Ronzel	Robinson, Sarah	Robinson, Stephanie
Robinson, Tom	Robison, Cheryl	Robison, David	Robison, Fred	Robison, Sandra	Robledo, Iris
Robles, Ruth	Robson, Donna	Robson, Ella	Robson, Eric	Rocco, Evelyn	Rocco, Priscilla
Rochambeau, Rod	Roche, Christopher	Roche, Clinton	Roche, David	Roche, Maureen	Roche, Peter
Roche, Sue	Roche, Tim	Rochel, Dan	Rocheleau, Jessica	Rochester, Judy	Roche-zujko, Kathleen
Rochkind, Jodie	Rocissono, Dean	Rock, Richard	Rock, Wes	Rockafellow, Harriet	Rockey, Phillip
Rockliff, Michael	Rocklyn, Aaron	Rockstrom, Martin	Rockwell, Dana	Rockwell, Susan	Rodack, Soretta
Rodar, Jodi	Roddy, Barbara	Roderer, Sara	Roderick, Rodney	Roderick, Susan	Rodewald, Lindy
Rodgers, Andrew	Rodgers, Betty	Rodgers, Camie	Rodgers, Jill	Rodgers, Joyce	Rodgers, Melissa
Rodgers, Patricia	Rodgers, Ron	Rodgers, Shelly	Rodin, Nick	Roditi, Hannah	Rodolfo, Kelvin
Rodoyianni, Victoria	Rodr+¡guez, Rosa	Rodrigues, Sandra	Rodrigues, Sharon	Rodriguez, Ana	Rodriguez, Ariana
Rodriguez, Belkys	Rodriguez, Brenda	Rodriguez, Concepcion	Rodriguez, Cristhianne	Rodriguez, E.J.	Rodriguez, Eduardo
Rodriguez, Eliseo	Rodriguez, Frank	Rodriguez, Haide	Rodriguez, Jasmin	Rodriguez, Javier	Rodriguez, Jean
Rodriguez, Jencie	Rodriguez, Joel	Rodriguez, Kayla	Rodriguez, Melisa	Rodriguez, Mireya	Rodriguez, Noe
Rodriguez, Oscar	Rodriguez, Raquel	Rodriguez, Raul	Rodriguez, Richard	Rodriguez, Stephanie	Rodriguez, Sylvia
Rodriguez, Ursula	Rodriguez, Vilma	Rodriguez, Yanelis	Rodriquez, Joseph	Roe, Bruce	Roe, Christina
Roebuck, Jody	Roebuck, Margaret	Roeder, Meri	Roegner, Debby	Roehm, Dave	Roeland, Isabelle
Roelof, Georgia	Roemer, Nancy	Roemisch, Debrah	Roesch, AL	Roesch, Klaus	Roeske, Frank
Roeske, Peggy	Roesner, Linda	Roff, Jessica	Rogan, Alex	Rogan, Robert	Rogan, Sue
Rogat, Albert	Rogers, A	Rogers, Allison	Rogers, Andrea	Rogers, Ann	Rogers, Anne
Rogers, Anne	Rogers, Barb	Rogers, Barbara	Rogers, Belinda	Rogers, Chris	Rogers, Dennis
Rogers, Dirk	Rogers, Florence	Rogers, Glenn	Rogers, James	Rogers, Jessica	Rogers, Joe
Rogers, Jolene	Rogers, Kathleen	Rogers, Lee	Rogers, Lilith	Rogers, Loretta	Rogers, Matthew
Rogers, Meryl	Rogers, Miriam	Rogers, Paul And Judith	Rogers, Reenie	Rogers, Sally	Rogers, Steve
Rogers, Storrey	Roggenbuck, Thor	Roggow, Barbara	Rogin, Naomi	Rogozinski, Sarah	Roh, Gabrielle
Rohde, Johanna	Rohde, Thomas	Rohdenburg, Robert	Rohlf, Gerard	Rohlfs, Debra	Rohloff, Rosalyn
Rohmer, Michael	Rohn, Diane	Rohner, Robert	Rohrbaugh, Stacey	Rohrer, Barb	Rohrer, Chuck
Rohrer, W Jean	Rohwedder, Caroline	Roidt, Rhonda	Rojas, Betty	Rojas, Cristal	Rojas-taylor, B.
Rokosch, James	Rol, Anna Natalie	Roland, Karen	Roland, Raymie	Rolbeck, Mike	Roley, Aleece

Rolfes, Kevin	Rolle, Tim	Rollings, Andrew	Rollings, Deborah	Rollins, Ruth	Rollins, Susan
Rollison, Sheri	Rollman, Reyne	Roloff, Paul	Rolofson, Tom	Rolstone, Darrell	Roma, Michele
Romagna, Christophe	Romaine, Caridad	Roman, Christina	Roman, Marissa	Roman, Nora	Romanco, Ernest
Romann, Joanne	Romano, Joseph	Romano, Karen	Romanowski, Scott	Romans, Jennifer	Romberger, Cynthia
Rome, Hynda	Romero, Juanita	Romero, Kristine	Romero, Veronica	Romine, Janet	Rominger, Nancy
Romo, Roberto	Romolino, Leslie	Romppanen, Christa	Rompre, Rita	Romska, Cecilia	Ronchetti, Dr. Francesco
Ronco, Garry	Ronderos, Martha	Ronngren Guerci, Ingrid	Roo, Reeta	Rook, Natalie	Rooney, Bruce
Rooney, Diane	Rooney, John	Rooney, Mary	Rooneykatsma, Lynne	Roorda, Andrea	Roos, Lloyd
Roos, Maryetta	Root, Barbara	Root, Edith	Root, Elizabeth	Root, Jessie	Root, Sharon
Roper, Rebecca	Roper, Renee	Ros, Duija	Rosa, Angelease	Rosa, J	Rosalen, Maria
Rosandich, Bridget	Rosa-re, Samantha	Rosas, Greg	Rosas, Stephanie	Rosasco, Paula	Rosato, Salli
Rosca, Mihaela	Roscetti, Thomas	Roscoe, Charles	Rose, Amanda	Rose, Arthur	Rose, Barbara
Rose, Bonita	Rose, Cindy	Rose, Diann	Rose, Ellyne	Rose, Jay	Rose, Jeanne
Rose, Jena	Rose, Kathryn	Rose, Lois	Rose, Lori	Rose, Lorie	Rose, Marian
Rose, Marilyn	Rose, Mary	Rose, Randall	Rose, Ray	Rose, Rebecca	Rose, Sarah
Rose, Shakti	Rose, Steve	Rosefortmueller, Laura	Rosen, Barbara	Rosen, Helene	Rosen, Judith
Rosen, Judith	Rosenbach, Kelley	Rosenbaum, Dr. And Mrs. Steven	Rosenbaum, Manuel	Rosenberg, Emily	Rosenberg, Irene
Rosenberg, Larry	Rosenberg, Pauline	Rosenberg, Robert	Rosenberg, Steven	Rosenberry, Gayle	Rosenblatt, Enid
Rosenblatt, Jonathan	Rosenblatt, Roy	Rosenblum, Stephen	Rosenbrock, Sara	Rosencrantz, Albert	Rosenfeld, C
Rosenfeld, Mimi	Rosenfeld, Mitchel	Rosenfield, Lynne	Rosengrant, Deb	Rosenkotter, Barbara	Rosenkrantz, Stewart
Rosenlicht, Carla	Rosenstein, Danielle	Rosenstein, Sarah	Rosenthal, Andrew	Rosenthal, Illia	Rosenthal, Rima
Rosenzweig, Barbara	Rosette, Renee'	Rosignoli, Renee	Rosin, Jay	Rosin, Lawrence	Rosing, Aron
Rosing, Veronica	Rosinski, Katrin	Rosko, Laura	Rosman, Rebecca	Rosmarin, Amy	Rosmini, Maria
Rosoff, Monica	Ross, Adrienne	Ross, Alice	Ross, Andrea	Ross, Ann Marie	Ross, Audrey
Ross, Bruce	Ross, Catherine	Ross, Darlene	Ross, David	Ross, Deborah	Ross, Glenn
Ross, James And Judith	Ross, Jean	Ross, Jeffrey	Ross, Joan	Ross, Joann	Ross, Kaitlin
Ross, Kay	Ross, Ken	Ross, Leonard	Ross, Libby	Ross, Lilli	Ross, Linda
Ross, Lucy	Ross, Lynda	Ross, Melody	Ross, Michael	Ross, Molly	Ross, Pat
Ross, Patsy	Ross, Richard	Ross, Robert	Ross, Rogard	Ross, Sally	Ross, Scott
Ross, Sherry	Ross, Stephanie	Ross, Steven	Ross, Susan	Ross, Suzanne	Rosser, Ellen
Rosser, Paula	Rosser, Sam	Rossetter, Zsuzsanna	Rossetti, Mark	Rossi, Daniela	Rossie, C
Rossignol, Carline	Rossiter, Shannon	Rossman, Ann	Rossman, Jeremy	Rosso, Brit	Rost, Judith
Rotermund, Kristy	Roth Smith, Melanie	Roth, Alison	Roth, Augustine	Roth, C	Roth, Cee
Roth, Daniela	Roth, Gaby	Roth, Hannah	Roth, Judith	Roth, LU	Roth, Margaret
Roth, Margaret	Roth, Mary	Roth, Pam	Roth, Robert	Roth, Shannon	Roth, Steve
Rothauser, S	Rothberg, Cheryl	Rothe, Sharon	Rothermel, Rose	Rothman, Diana	Rothman, Emily
Rothman, Sarah	Rothman, William	Rothrock, Meredith	Rothstein, Richard	Rothstein, Roxane	Rothwarf, Jeanne
Rothweiler, Tracy	Rothwell, James	Rotola, Christine	Rotramel, Ernest	Rottman, Adam	Rottmayer, Thomas
Rotz, Mike	Rouff, J	Roumell, Michele	Rourke, Anne	Rourke, Marie	Rouse, Frank
Rouse, Gregory	Rouse, Michael	Rousseau, Elizabeth	Rousseau, Karline	Rousseau, Nicole	Rousseau, Patrick
Routh, Vicki	Roux, Maryanne	Roveo, Nivo	Rovere, Ann	Roverts, Chuck	Rowan, C
Rowan, Cathy	Rowe, Catherine	Rowe, David	Rowe, Paul	Rowe, Susan	Rowe, Tom
Rowe, William	Rowell, John	Rowland, Alexis	Rowland, Jonathan	Rowland, Patrick	Rowland, Rhys
Rowley, Christopher	Rowlson, Robert & Carolyn	Roy, Dominic	Roy, Hildy	Roy, Joe	Roy, John Paul
Roy, Joseph	Roy, Kim	Roy, Linnea	Roy, Ricky	Royalty, Debbie	Roybal, Chandra
Royce, Carol	Royce, M	Royer, Allen	Royer, Carol	Rozelle, Allen	Rozman, Abraham
Rozmus, Karen	Rozner, Jay	Rozo, Carolina	Rozos, Louise	Rozycki, Les	Rs, Jill
Rsm, Sister Mary Schmuck	Rua, Maria	Ruane, Shirley	Ruben, Julie	Ruben, Rona	Rubenstein, Bruce
Rubenstein, Howard	Rubenstein, Steven	Rubin, Bill	Rubin, Donald	Rubin, Edward	Rubin, Joan
Rubin, Karin	Rubin, Linda	Rubin, Marc	Rubin, Mira	Rubin, Robert	Rubin, Rochelle
Rubin, Stanley	Rubinfine, Deborah	Rubinfine, Deborah	Rubino, Heather	Rubinow, Stuart	Rubio, Chris
Rubio, Dr. E	Ruble, Bonnie	Ruble, Gary	Ruby, Elisabeth	Ruby, Jacki	Ruby, Kenneth

Ruby, Teresa	Ruckdaeschel, Sandra	Rudan, Alan	Rudd, Laura	Ruderman, Matt	Rudin, Jennifer
Rudisill, Derek	Ruditis, Jana	Rudnicki, Miranda	Rudolph, Jim	Rudolph, Joellen	Rudolph, Lauri
Rudser, Laura	Rudy, Karen	Rue, Carol	Rueckert, Cornelia	Ruefenacht, Sibylle	Rueli, Michael
Rues, Alicia	Ruffin, Claire	Rufo, Rita	Ruggiero, Emma	Ruggiero, Rachel	Ruggiero, Sue
Ruggles, Patricia	Ruhl, Thomas	Ruiter, Rikje Maria	Ruiz, Arnold	Ruiz, Eugena	Ruiz, O.
Ruiz, Patricia	Ruiz, Vanessa	Rukavina, Betty	Ruland, Kate	Rule, Juliann	Rulejr, Jerry
Rullmann, Gale	Rumiantseva, Elena	Rumley, Katie	Rummel, Thomas	Rump, Trevor	Rumph, Donald
Rumskas, Martha	Rund, Jen	Runge, Erica	Rungis, Sniedze	Runion, Julie	Runion, Paul
Runkel, Barbara	Runkle, Robert	Ruoff, Eugene	Ruopp, Kathy	Ruotolo, Amy	Ruotolo, Pat
Rupert, Greg	Rupert, Tracy	Rupp, Jan	Rupp, Karin	Rupp, Nancy	Ruppel, Kathy
Rupprechter, Renate	Rusch, Diane	Ruscin, Lisa	Rusczyk, Heather	Rusell, Carlton	Rush, Charlene
Rush, Lauren	Rush, Lawrence	Rush, Mike	Rush, Robert	Rushefsky, Molly	Rushlau, Mary Anne
Rushoe, Linda	Rusk, Carol	Rusk, Zach	Russ, Henry	Russell Lichtenberg, Elsa	Russell, Carol
Russell, Christina	Russell, Douglas	Russell, Harry	Russell, Ivan	Russell, Jan	Russell, Janet
Russell, Jesse	Russell, Joel	Russell, Judith	Russell, Michael	Russell, Michael	Russell, Nerissa
Russell, Pamela	Russell, Patrick	Russell, Paul	Russell, Paulinha	Russell, Rick	Russell, Sarah
Russell, Thomas	Russell, Toni	Russick, Sharon	Russie, Roberta	Russman, Rick	Russo, Cathy
Russo, Cheyenne	Russo, Cristina	Russo, Dennis	Russo, Joe	Rust, Marlene	Ruszak, Nicholas
Rutecki, Deborah	Ruterman, Sandra	Ruth, Davis	Ruth, Dick	Ruth, Jennifer	Ruth, Julie
Ruth, Paula	Rutherford, Bruce	Rutherford, Julie	Rutherford, Lisa	Rutherford, Valerie	Rutherford, Zinn
Ruthroff, Katharine	Ruthsdottir, Ann	Rutigliano, Janet	Rutkowski, Dawn	Rutledge, Clifford	Rutte, Carol
Ruttura, Gaye	Rutz, Darryl	Ryals, Jill	Ryals, Sara	Ryan, Allan & Ellen	Ryan, Anne
Ryan, Cheryl	Ryan, Cindy	Ryan, Diane	Ryan, Dionne	Ryan, Elaine	Ryan, Elizabeth
Ryan, Emma	Ryan, Holley	Ryan, Jack	Ryan, Jennifer	Ryan, Jo Ann	Ryan, Jonah
Ryan, Mark	Ryan, Melissa	Ryan, Michael	Ryan, Michael	Ryan, Patricia	Ryan, Richarle
Ryan, Tam	Ryan, Todd	Ryan, Virginia	Ryan-busch, Janette	Ryba, Dominique	Rybicka, Katarzyna
Rybicki, John	Rybka, C.T.	Rybovich, Deb	Rycheck, Kevin	Rychwalski, Ignatius	Rycraft, John
Rydberg, Mats	Ryder, Dale	Ryder, Gigi	Ryder, James	Ryder, Judy	Rydstrom, Gunnel
Rygiel, Rose	Ryken, Amanda	Ryland, Gail	Ryman, Denise	Ryman, Julie	Rynasiewicz, Robert
Rynes, Michael	Ryter, Joanna	Rzeczycki, Joseph	S, Annabelle	S, Barb	S, C
S, Deb	S, J	S, J	S, John	S, L	S, Lauiula
S, Rob	S, Susan	S, Susie	S, T	S, T	S, Tom
S., A.	S., C.	S., Rosemary	S., Sam	Saadia, Daniel	Saaf Capozza, Lisa
Saaris, Gary	Saavedra, Jessica	Sabas, Armando	Sabasko, Gail	Sabato, Jennie	Sabbats, Brian
Sabet, Laila	Sabharwal, Pritam	Sabin, Carolyn	Sabo, Betty	Saccardi, John	Sacchetti, Dianne
Sacco, Julie	Sachs, Harvey	Sachs, Nikki	Sachs, Susan	Sachsiacob, Marianne	Sackett, Sam
Sackmann, Jody	Sacks, Marie	Saddler, Adrienne	Sadeghpour, SY	Sadiq, Tracey	Sadkovsky, Vera
Sadler, Jim	Sadlo, Brian	Sadoulet, Valerie	Sadovnikoff, Laura	Sadowska, Paulina	Sadowskas, Bruce
Sadowski, Diane	Sady, Edward	Saeedi, Dona	Saeki, Yuji	Saenz, Dolores	Saez, Denisa
Safchick, Kathy	Safos, Chris	Sagas, Ernesto	Sage, Daniel	Sage, Eric	Sage, Marcia
Sage, R	Sage, Sandy	Sage, Sherri	Sager, Maryjane	Sager, Sharol	Sager, Susan
Sagle, James	Sagovac, Emily	Sagstetter, Danny	Saia, Chris	Saia, Debi	Saia, Dominick
Sailer, John	Sailors, Emma Lou	Saint John, Rose	Saintamour, Jeanne	Saint-marie, Mary	Saisa, Olivia
Saito, Mariko	Saitta, Martin	Saja, Jean	Sajdak, James	Sakoda, Kent	Saks, Daniel
Sala, Guillermo	Salama, Moktar	Salamanca, Aura	Salanitro, Laura	Salata, Brad	Salaz, Antonia
Salazar, Alyssa	Salazar, Francisco Javier	Salazar, Joe	Salazar, Lisa	Salazar, M	Salazar, Randy
Salazar, Rita	Salazar, Selena	Salch, Susan	Salehi, Siamak	Salgado, Jane	Salgado, Mario
Salgado, Natasha	Salhus, Jennifer	Salib, Sadie	Saliba, Nadine	Salisbury, Sandra	Sall, Gloria
Sallee, Barbara	Sallee, Richard	Sallettes, Barbara	Salloom, Clara	Salma, Ronald	Salmen, Robert
Salmeron, Marjorie	Salomon, Stanley	Salone, Margarite	Salstrom, Paul	Salt, Max	Saltalamacchia, Lisa
Salter, Andrew	Salter, JD	Saltzgiver, Colleen	Saltzman, Md, Dana Jane	Salud, Nelson	Salvas, Kathleen
Salvatore, Hannah	Salvatoriello, Larry	Salvo, Dennis	Salz, Barbara	Salzberg, Laurie	Salzer, Andrea
Salzgeber, Karen	Salzman, Vicki	Samaniego, Dorian	Samaras, Alexandra	Samelak, Sherri	Sames, Thea
Sametz, Hillary	Sammon, John	Sammons, Rita	Samp, Cecelia	Sampedro, Ligia	Sampson, Meredith

Sams, Victoria	Samson, Patricia	Samuda, Empara	Samuel, Sheryl	Samuelraj, Sugunakumar	Samuels, Janie
San Diego, Jeanne Marie	San Miguel, Pamela	San, Fundacin	Sanabria, Wilson	Sanborn, Gary	Sanchez Gaudet, Jennifer
Sanchez, Albert	Sanchez, Dana	Sanchez, Diana	Sanchez, Fernandez	Sanchez, Heather	Sanchez, Jennifer
Sanchez, Mary	Sanchez, Mayra	Sanchez, Ralph	Sanchez, Rose	Sanchez, Saul	Sanchez, Tawnya
Sanchez, Vince	Sanchez, Yolanda	Sanchezlasthaus, Anja	Sanchez-levine, G L	Sand, Laura	Sand, Merrie
Sanda, Vladimir	Sandage, David	Sandeen, Judith	Sanders George, Kim	Sanders, Brenda	Sanders, Catharine
Sanders, Charles	Sanders, Chris	Sanders, Donald	Sanders, Dwight	Sanders, Holli	Sanders, Jan
Sanders, Jeffrey	Sanders, Judith	Sanders, Kathleen	Sanders, Kathy	Sanders, Mary	Sanders, Mary
Sanders, Tammra	Sanderson, Kari	Sanderson, Leslie	Sanderson, Paul	Sanderson, Sandy	Sanderson, Valerie
Sandes, Carol	Sandgrund, Robert	Sandhu, Nina	Sandknop, Kathleen	Sandler, Erin	Sandler, Jennie
Sandler, Joshua	Sando, Scott	Sandorff, Arlene	Sandoval, Dore	Sandoval, Faye	Sandoval, Tirzah
Sandow, Chris	Sandretto, Laurie	Sandri, Sandra	Sands, Becky	Sands, Tracey	Sandvig, Daniel
Sandy, Holly	Sandy, Leo	Sanetra, Lisa	Sanfilippo, Val	Sanford, Chris	Sanford, Ellen
Sanford, Jane	Sanford, Janis	Sanford, Ken	Sanford, Melissa	Sang, Jillian	Sanger, Tanya
Sanguinetti, Karen	Sanhueza, George	Sannella, Dr. Frank W.	Sanocki, Susan	Sans, Joe	Sansone, V. Robert
Sant, Sam	Santa, Peter	Santamaria, Cristina	Santamariabetancour, Roberto	Santamour, Jamie	Santana, Audra
Santangelo, Elaine	Santangelo, Frank	Santarsiero, Michael	Santiago Jr., Raymond	Santiago, Alex	Santiago, Alicia
Santiago, Ilya	Santiago, Juan	Santiago, Lydia	Santiago, Nino	Santiago, Norma	Santiago, Thoams
Santiagogamble, Tyler	Santo, Keith	Santone, Deborah	Santone, Leah	Santopietro, B Angela	Santoro, Dr. David
Santoro, Elizabeth	Santos, Betty	Santos, Cynthia	Santos, Eloy	Santos, Faye	Santos, Jeanette
Santos, Maria	Santos, Richard	Santos, Trixie	Sarabia, Michael	Saraceno, Deon	Sarafopoulos, Dikea
Saran, Harvinderjit	Saraniti, Madeline	Sarasa, Ricardo	Saravanja, Natasha	Sarbiewski, Stephen	Sarchet, Charles
Sardonyx, Lord	Sare, Margie	Sarfert, Bruce	Sargeant, Richard	Sargent, Donald	Sargent, Robert
Sargent, Todd	Sargent, William	Sargis, Jessie	Sarkis, Jean	Sarkisian, George	Sarlos, Charlotte
Sarmiento, JC	Sarna, Jan	Sarne, Sabrina	Sarovec, William E.	Sarraille, Marijeanne	Sarris, Dorian
Sarry, Sandra	Sartor, Linda	Sartori, Eri	Sarver, Michael	Sarvis, Jan	Sasanoff, Robert
Sasman, Lin	Sassaman, Richard	Satchell Lutherville, Samantha	Sather, Alice	Satifka, Tricia	Sato, Nancy
Satter, Arthur	Saturen, Yaakov	Saucedo, Jessica	Sauer, Liz	Sauerhoff, Robert	Saulsbury, Carol
Saulsgiver, Priscilla	Saunders Rn, Linda	Saunders, Chad	Saunders, Joshua	Saunders, Laura	Saunders, Naomi
Saunders, Pamela	Saunders, Ralph	Saunders, Richard	Saunders, Sharon	Saunders, Susan	Saunders, Suzanne
Saunders, Suzanne	Saurs, Terri	Saus, Nicole Marie	Savage, Albert	Savage, Caroline	Savage, Devin
Savage, Edward	Savage, Julianne	Savage, Patricia	Savageau, Bonnie	Savarda, Ray	Savary, Carol
Saver, Barry	Savett, Adam	Saviano, Maria	Savides, Peggy	Savin, Mandy	Savino, Heather
Savio, Mark	Savitch, Steve	Sawina, Jane	Sawlani, Aneesh	Sawyer, Ashley	Sawyer, Donald
Saxon, Richard	Sayas, Herbert	Sayer, Coletta	Sayers, Curt	Sayre, Lily	Sazonova, Olga
Sbonek, Jeffrey	Scahill, John	Scala, Michael	Scaletta, Joyce	Scalmanini, Stephen	Scaltrito, Marietta
Scalzitti, Jana	Scanlon, John	Scanlon, Karen	Scantlebury, Jane	Scanzillo, Frank	Scarborough, Margaret
Scarborough, Savannah	Scarci, Kris	Scarfone, Louise	Scarpelli, Victoria	Scarpone, Katy	Scarry, Patrick
Scarupa, Henry	Scarzello, Nancy	Scattolini, Gianni	Scavezze, Barb	Scerra, Timothy	Sch, Janet
Schabram, Kira	Schacher, Phyllis	Schacht, Timothy	Schachterle, Russell	Schade, Corey	Schade, Kris
Schader, Kevin	Schaechter, John	Schaef, Dennis	Schaefer, Clair	Schaefer, George	Schaefer, Maija
Schaefer, Stephen	Schaefers, John	Schaeffer, Kathy	Schaeffer, Michael	Schaem, Suzanne	Schaetzel, Linda
Schafer, Cassandra	Schafer, Maggie	Schafer, Peter	Schafer, Robert	Schafer, Wayne	Schaffer, Carol
Schaffer, Charles	Schaffer, Elizabeth	Schaffer, Ellen	Schaile, Cheryl	Schairer, Bonnie	Schally, Jennifer
Schamel, Raymond	Schaming, Carol	Schaming, Melissa	Schandall, Rami	Schandelmeier, Linda	Schaper, Nicholas
Schappek, Marianne	Scharf, Janis	Schartz, Ellen	Schatz, Eileen	Schatz, Vivian	Schatzel, Deb
Schaub, Marsha	Schauer, Donna	Schauer, John	Schaumloffel, Rosemary	Schaus, John	Schaut, Matthew
Schear, Roberta	Schecter, Maggie	Schecter, Rob	Schedler, Ginger	Scheel, Carol	Scheele, Paul
Scheer, August And Elizabeth	Scheeren, Stephen	Scheffler, Susanne	Scheiderer, Heather	Scheidt, Will	Scheihagen, Eric
Scheinberg, Marnie	Scheingold, Mark	Scheirer, Peter	Scheld, Steve	Schelin, Christina	Schell, Barbara
Schell, Tara	Scheller, Emil	Schenck, Alan	Schenck, John	Schenk, Kathie	Schenk, Michael

Schepps, Berdalee	Scherer, Garry	Scherer, Heather	Scherer, Josephine	Scherer, Suzanne	Schermer, Linda
Scherrman, Scott	Scherzer, Teresa	Schibelius, Heide	Schick, Peter	Schieferecke, Angela	Schielke, Robin
Schiff, Tiffany	Schiffman, Lauren	Schiks, Diane	Schild, Darvin	Schildgen, Bob	Schilke, Donald
Schill, Bill	Schiller, Judith	Schiller, Marlene	Schiller, Mike	Schiller, Paul	Schilling, Francis
Schilling, Krystal	Schilling, Robert	Schimmel, Michael	Schimming, Barbara	Schimpf, Linda	Schindele, Paulette
Schipman, Nikki	Schira, Jane	Schiratti, Rsm, Claudette	Schlachter, Scott	Schlaffer, Runa	Schlaffer, Tatiana
Schlagal, R.	Schlais, Karen	Schlatter, Jeanne	Schlechty, Karen	Schlecker, Rose	Schlegel, Debra
Schlegel, Karen	Schleich, Kathleen	Schleicher, Bruce	Schlein, Elizabeth	Schlemel, Pierre	Schlemmer, Donna
Schlenker, Patricia	Schlesinger, Fern	Schlesinger, Ronald	Schless, Laurits	Schlippert, Glenn	Schloessinger, Fred
Schloss, E.S.	Schloss, Morley	Schlosser, Olivia	Schluter, Don	Schmadel, Don	Schmall, Eric
Schmeckpeper, Ted	Schmeling, James	Schmick, Emily	Schmid, Debra	Schmid, Elaine	Schmid, Ewan
Schmid, Jeff	Schmidig, Amber	Schmidt, Brigitte	Schmidt, Connie	Schmidt, Edgard	Schmidt, Fran
Schmidt, Gelinda	Schmidt, Ingrid	Schmidt, Jacqueline	Schmidt, Jacquelyn	Schmidt, Jan	Schmidt, Janet
Schmidt, Jason	Schmidt, Jennifer	Schmidt, Jennifer	Schmidt, Julie	Schmidt, Justin	Schmidt, Kimberly
Schmidt, Laurie	Schmidt, Linda	Schmidt, Marisa	Schmidt, Mary	Schmidt, Misty	Schmidt, Norm
Schmidt, Oskar	Schmidt, Ramona	Schmidt, Roger	Schmidt, Sharon	Schmidt, Sheri	Schmidtbailey, Barbara
Schmierer, Melissa	Schminke, Molly	Schmit, Alleen-marie	Schmit, Dennis	Schmitt, Deborha	Schmitt, James
Schmitt, Karl	Schmitt, Lana	Schmitt, N	Schmitt, Walter	Schmittauer, John	Schmitthenner, Christine
Schmitz, Carolyn	Schmitz, Christiane	Schmitz, Claudia	Schmitz, Heidi	Schnabel, Erik	Schnabel, Jen
Schnaidt, Ann	Schnebel, Sherry	Schnee, Jane	Schneebeli, Chris	Schneider, Allyn	Schneider, Amy
Schneider, Carol	Schneider, Daniel	Schneider, Daphne	Schneider, David	Schneider, Dror	Schneider, Jeff
Schneider, Joann	Schneider, Karen	Schneider, Linda	Schneider, Lorette	Schneider, Lucy	Schneider, Lynn
Schneider, Mary	Schneider, Mary B.	Schneider, Misti	Schneider, Nancy	Schneider, Nikki	Schneider, Pearl
Schneider, Sylvia	Schneider, Wendy	Schneiders, Barb	Schneidler, Sue	Schnell, Patrick	Schneller, Paul
Schnoor, Michelle	Schoch, Leonard	Schock, Katherine	Schockner, Janet	Schodlatz, Diane	Schoedler, Randolph
Schoelerman, Deb	Schoemer, Richard	Schoen, Allen	Schoenbohm, Susan	Schoener, Lisa	Schoenfeld, Jody
Schoenfield, Rick	Schoetker, Sue	Schoettler, Joanna	Schofner, Jason	Schogel, David	Scholl, Barbara
Scholl, Chris	Scholl, Rick	Scholten, Andrew	Scholz, Denise	Schonewill, Cliff	Schonfeld, Michelle
Schoonover, Katherine	Schorin, Susan	Schorling, H.	Schorova, Zdenka	Schorr, K	Schott, Joe
Schott, Katharine	Schoultz, Lisa	Schrauer, Jonathan	Schreck, Richard	Schreiber, John	Schreiber, Sherry
Schreier, Jill	Schreier, Saul	Schreiner, Darcy	Schreiner, Erik	Schremmer, Bruno	Schriner, Macie
Schroeder, Carol	Schroeder, Clara	Schroeder, Kathy	Schroeder, Kristian	Schroeder, Marlene	Schroeder, Mary
Schroepfer, Tracy	Schroering, Mary	Schryba, Paul	Schubert, Heidi	Schubert, Julie	Schuch, Janice
Schuchard, Susan	Schuchert, Joseph	Schuchman, David	Schuchter, Dorrit	Schuck, Joy	Schue, Shirley
Schuelke, Janessa	Schuessler, Betty	Schuessler, Philip	Schuessler, Tom	Schueth, Steve	Schuetz, Ralf
Schuh, Jonathan	Schuhow, Mike	Schulenburg, Charlene	Schuler, Bill	Schulman, Alison	Schulman, Jason
Schulman, Ken	Schulman, Matthew	Schulte, Georgiann	Schulte, Michael And Rose	Schultehenrich, Fran	Schultz, A
Schultz, Anne Marie	Schultz, Brendan	Schultz, Cindy	Schultz, Gordon	Schultz, Howard	Schultz, Lesley
Schultz, Leslie	Schultz, Mary	Schultz, Richard	Schultz, Ruth	Schultz, Sidney	Schultz, Stephanie
Schultz, Steven	Schultz, Toby	Schultz, WM	Schultze, Patricia	Schultze, Patti	Schultzpowell, Latoya
Schulz, Jennifer	Schulze, Bethany	Schum, James	Schumacher, Amy	Schumacher, Brandy	Schumacher, Jeff
Schumacher, Rachel	Schumacher, Tara	Schumaker, Karl	Schumann, S. M.	Schunck, Toby	Schuppe, Tom
Schurr, Arthur	Schussler, Marleen	Schutt, Mike	Schutt, Paul	Schutzman, Lloyd	Schvindlerman, Corina
Schwab, Diana	Schwager, Karen	Schwall, Nancy	Schwaller, Greg And Laurie	Schwandes, Shaytu	Schwanke, Tiffany
Schwar, Mathew	Schwartz, Angela	Schwartz, Becky	Schwartz, Brian	Schwartz, Christopher	Schwartz, Debbie
Schwartz, Don	Schwartz, Elizabeth	Schwartz, Florence	Schwartz, J	Schwartz, Jack	Schwartz, Jeff
Schwartz, John	Schwartz, Kelly	Schwartz, Leslie	Schwartz, Marge	Schwartz, Randy	Schwartz, Richard
Schwartz, Ronlyn	Schwartz, Voula	Schwartzberg, Norma	Schwartzman, Henry	Schwartzman, Liya	Schwarz, Diane
Schwarz, Sibylle	Schwarz, Steve	Schwarze, Richard	Schwegler, Tom	Schweickhardt, Jennifer	Schweigertcarnahan, Linda
Schweinsberg, Dorothy	Schweitzer, David	Schweitzer, John	Schwenk, John	Schwenk, Kurt	Schwer, Deb

Schweyen, Veronica	Schwind, Gloria	Schwind, Laura	Schwinn, Margie	Schwisow, Laurie	Schwyhart, Philip
Sciacca, Natalie	Sciamanda, Francis	Sciandra, Eva	Sciarrillo, Loisann	Scibetta, Jen	Sciortino, Grace
Scioscia, Jacquelyn	Scipione, Josephine	Scoby, Richard G	Scolastico, John C	Scoon, Andrew	Score, Tara
Scott Iii, Donald	Scott, Abby	Scott, Alicia	Scott, Andrew	Scott, Barbara	Scott, Bennie
Scott, Betty	Scott, Brenda	Scott, Brenda H.	Scott, Candace	Scott, Carol	Scott, Catherine
Scott, Cathy	Scott, Celia	Scott, David	Scott, Deirdre	Scott, Dorinda	Scott, Edd
Scott, Ellen	Scott, Geoffrey	Scott, Gordon	Scott, Gregory	Scott, Hayley	Scott, Heidi
Scott, Jack	Scott, James	Scott, Jane	Scott, Jennifer	Scott, JO	Scott, John
Scott, Juliann	Scott, K	Scott, Karen	Scott, Kevin	Scott, Kristi	Scott, Kyle
Scott, Les	Scott, Linda	Scott, Linda	Scott, Mary	Scott, Michael	Scott, Nico
Scott, Pamela	Scott, Rachel	Scott, Russell	Scott, Sarah	Scott, Savannah	Scott, Sherri
Scott, Star	Scott, Wenona	Scott, William	Scott-harris, Nicole	Scotto Di, Maria Pia	Scotto, Denise
Scotton, Bruce	Scoville, Janine	Scoville, Pam	Scribner, Jason	Scrima, Lawrence	Scripp, Margaret
Scripps Rodriguez, Catherine	Scrol, Carol	Scruton, Gordon	Scuder, Amanda	Scullion, Jason	Scully, Patricia
Sculnick, Herb	Scuzzese, Bette	S-d, Madeleine	Se, Russell	Seabold, Richard	Seaborg, David
Seaborn, Sheila	Seabrook, Cecilia	Seader, Scot	Seager, Michael	Seagraves, Deanna	Seakwood, John
Seales, Sharon	Seals, William	Seaman, Mag	Seaman, Rita	Seaman, Sharon	Seamans, James
Seamans, Kurt	Seamon, John	Searfoss, Sylvia	Searing, Robert	Searles, Dave	Sears, Carol
Sears, Helen	Sears, Julie	Sears, Nicole	Searson, Douglas	Seather, Linda	Seaton, Mark
Seaver, Carol	Seaver, Linda	Seavey, Anny	Seawright, John	Sebesta, Doyle	Sebesta, Fred
Sebrosky, Amanda	Seckel, John	Sedano, Claudia	Sederquest, Evan	Sedy, Alice	Seeber, Arlene
Seecharan, Renata	Seefeldt, Trina	Seegott, Mary	Seehafer, Maryellen	Seeley, Marsha	Seevers, Eiko
Seeves, Jerry	Seewald, Dawn	Seferstefancic, Ljubica	Seff, Joshua	Sefton, John	Segadelli, Isabelle
Segal, Gerry	Segal, Yvonne	Segedy, Avis	Seger, Kimberly	Segnitz, Lisa	Segrest, Jessica
Segura, Alana	Seibels, Cynthia	Seibert, John	Seibold, Carolyn	Seidel, Guenther	Seidler, Lisa
Seidman, Debora	Seidman, Tom	Seifert, Kayla	Seigel, Martin	Seiji, Lorraine	Seil, Fredrick
Seiler, Helen	Seiler, Mike	Seiter, Charles	Seitz, Richard	Seivard, Jr., David	Seki, Eve
Sekuterski, Gabby	Selander, Spencer	Selbin, Susan	Selby, Carla	Selby, Nicole	Seldin, David
Selene, Jodi	Self, Winke	Sellers, Connie	Sellers, Deborah	Sellers, Joshua	Sellers, Judith
Sellers, Margaret	Sellers, Rita	Sellers, Robert Dale	Selles, Jocelyn	Sells, Ashley	Selto, Linda
Seltzer, Bob	Seltzer, Elizabeth	Seltzer, Kathleen	Selvage, Kimberly	Selverston, Sylvia	Seman, Stephen
Semenuk, Cynthia	Semereaux, Melody	Semingson, Joseph	Semit, Cary	Sempertegui, Carolina	Sena, Isabel
Sender, Stuart	Sendor, Virginia	Senegal, Aaron	Senger Jr, James	Sennott, Pamela	Sensenig, Trinidad
Sentovich, Barbara	Sepate, Stephanie	Seppala-etra, Laurel	Sepulveda, Christine	Sequichiekerchee, Debbie	Serafim, Petra
Seramba, James	Serazio, Charlotte	Serbia, Chris	Serenil, Alex	Serge, Kathleen	Sergeant, Joe
Sergi, Annette	Seriani, Jamie	Sering, Paul	Sermons, Chris	Serna, Jessica	Serna, Pedro
Serna, Russella	Serne, Sandra	Serody, Lucille	Serra De Alessio, Nadya Elena	Serra, David	Serra, Nikki
Serra, Ragen	Serrano, Ileana	Serrano, Irene	Serrao, Hilary	Serrato, Elizabeth	Sersig, Nan
Sertich, Andrew	Servizio, Paul	Sessa, Andrew	Sessa, Christopher	Sessoms, Molly	Seth, Frances
Setticase, Mary-anne	Seuferer, Shawn	Severino, Susan	Severs, JO	Severt, Romaine	Sevilla, Jessica
Sewald, Michelle	Sewelies, Birgit	Sewell, Kathleen	Sewell, Nate	Sexton, Elizabeth	Sexton, Lorraine
Sexton, Nicholas	Sexton, Tonya	Sextro, Robert	Seybold, Janice	Seyfried Jr, William M	Seyler, Louis
Seymour, Christopher	Seymour, Nancy	Seymour, Stephanie	Sfrengeu, Ioana	Sgrignuoli, Ron	Shaak, Susan
Shablow, Janette	Shackel, Gail	Shackleford, Richard	Shackman, Susan	Shacter, Steve	Shade, Terry
Shadle, Linda	Shadrach, Joyce	Shafer, Colleen	Shafer, Donald	Shafer, Elizabeth	Shafer, Stephen
Shaffer, Brandan	Shaffer, Hilda	Shaffer, Kurt	Shaffer, Michael	Shaffer, Nannette	Shaffer, Nicole
Shaffer, Suzanne	Shafroth, Catherine	Shah, Debra	Shah, Nandita	Shah, Sumit	Shahan, Beryl
Shahan, Mark	Shaiman, Marsha	Shalat, Harriet	Shallenberger, Mary	Shallman, Elsy	Shamblee, Teresa
Shamblin, Harriet	Shames-rogan, Julie	Shampney, Mary	Shamrocka, Steven	Shanahan, Pat	Shanahan, Walter
Shanahan, William	Shand, Bonnie	Shandera, Dr Nanci	Shane, Judith	Shank, Ronald	Shankel, Georgia
Shanker, Adrian	Shanks, Fran	Shanks, George	Shanley, Karen	Shanley, Paul	Shanley, Susan
Shannon, Danielle	Shannon, Erin	Shannon, Randall	Shanny, Jane	Shansby, Ron	Shap, Frank
Shapira, Susan	Shapiro, Daniel	Shapiro, Daniel	Shapiro, Denise	Shapiro, Ellene	Shapiro, Eve
Shapiro, Kathy	Shapiro, Leo	Shapiro, Linda	Shapiro, Mark And Felice	Shapiro, Matthew	Shapiro, Matthew

Shapiro, Michael	Shapiro, Steve	Sharee, Donna	Sharfman, William	Sharinus, Michael	Sharkey, Virginia
Sharlock, Leslie	Sharma, Deven	Sharma, Monisha	Sharp, Andrew	Sharp, Beth	Sharp, Brian
Sharp, Cameron	Sharp, Dwite	Sharp, Edward	Sharp, Karen	Sharp, Louise	Sharp, Margaret
Sharp, Vanessa	Sharpe, Audrey	Sharpe, Chip	Sharpe, Kristi	Sharpe, Libby	Sharples, Lynette
Sharpless, Joanne	Sharpnack, Sherry	Sharrer, Brian	Sharton, Tamara	Shatsky, Alex	Shattes, Wayne
Shaub, George	Shaub, Kimberly	Shaud, Charles	Shauger, Robert	Shaughnessy, Anna	Shaughnessy, Diane
Shave, Michele	Shaver, James	Shaver, Jami	Shaw, Annette	Shaw, Barbara	Shaw, Barbara
Shaw, Connelee	Shaw, Dennis	Shaw, Donald	Shaw, Donald	Shaw, Ian	Shaw, James
Shaw, Jeanne	Shaw, Jessie	Shaw, Lisa	Shaw, Madeline	Shaw, Michael	Shaw, Pamela
Shaw, Robert	Shaw, Sara	Shaw, Steven	Shaw, Susan	Shay, Kristin	Shay, Mike
Shea, Joan	Shea, Mary	Shea, Michael	Shea, Mike	Shea, Rachel	Sheaffer, Wanda
Sheahan, Joan	Sheahon, Colleen	Shearer, Allison	Shearer, Ruth W.	Sheatzley, Julia	Shedd, Dawn
Shedd, Karen	Shedd, Rebecca	Sheehan, Dale	Sheehan, Martin	Sheehan, S.	Sheeler, Pam
Sheely, Colleen	Sheen, Robert	Sheets, Gabriel	Sheets, Sarah	Sheffield, Michael	Sheikh, Azhar
Sheinson, Ronald	Shelburne, G B	Shelby, Sharon	Shelby, Vaughan	Sheldan, Vijay	Sheldon, Michelle
Shell, Emmett	Shellen, Jay	Shelley, Richard	Shelley, Wendy	Shellko, K. Arthur	Shelly, Art
Shelly, Charles	Shelly, Christopher	Shelton, Bradley	Shelton, Charleen	Shelton, Chris	Shelton, David & Carol
Shelton, Donnie	Shelton, Dorothy	Shelton, Olivia	Shematek, Judith	Shemeline, Andrew	Shemo, Elizabeth
Shen, Elizabeth	Shen, Gloria	Shenas, Mohsen	Shenk, Anna	Shenoy, Radha	Shepard, Lansing
Shepard, Rebecca	Shepard, Robin	Shepard, Tina	Shepherd, Brenda	Shepherd, Carol	Shepherd, Heather
Shepherd, Kathy	Shepherd, Marilyn	Shepherd, Nikki	Shepherd, Robert	Shepherd, Robert	Shepler, Larry
Sheppard, Andy	Sheppard, Sheila	Shepperd, Chrystian	Sherard, Susan	Sherblom, Elizabeth	Sherbring, Marta
Sheridan, Jim	Sheridan, Lenore	Sherman Bovensiepen, Kara	Sherman, Ann	Sherman, Cassilia	Sherman, David
Sherman, James	Sherman, Jennifer	Sherman, Leslie	Sherman, Lisa	Sherman, Marcia	Sherman, Mary
Sherman, Michael	Sherman, Rachel	Sherman, Rochelle	Sherman, Ruth	Sherman, Sarah	Sherman, Tom
Sherman, Trisha	Sherman, William	Shero, Dale	Sherrard, Kathryn	Sherratt, Carol Ann	Sherwin, Boyce
Sherwood, Amy	Sherwood, Dan	Sherwood, Dean	Sherwood, Ellen	Sherwood, Kate	Sherwood, L
Sherwood, Lisa	Sherwood, Sarah	Shevenell, Ashley	Shew, Margo	Shewalter, Stephanie	Shewan, William
Shiba, Sarah	Shibata, Marcia	Shields, Kevin	Shields, Maggie	Shields, Rosbene	Shields, Susan
Shields, Tawnya	Shields, Tessa	Shields, Victoria	Shieldsmaher, Patricia	Shifrin, Diane	Shije, Jeni
Shilling, Bruce	Shiloh, Jana	Shimek, William	Shinas, Sharon	Shindledecker, Paula	Shiner, Cathy
Shiner, Sherice	Shinsky, Michael	Shipler, Craig	Shipman, Mark	Shipp, Michele	Shipp, Susan
Shippen, Sallie	Shipton, Maggie	Shireman, Tommy	Shirey, Linda	Shirley, Cindy Lou	Shirley, Michaelf
Shirley, Rebecca	Shisila, Kerrie	Shisler, Craig	Shitanaka, Roy	Shively, Judy	Shivers, Timothy
Shivley, Debra	Shivley, Karen	Shlimon, Charles	Shliselberg, Aviva	Shnaider, Charlotte	Shoaf, Cindy
Shock, Janet	Shockley, Julia	Shoemaker, Dee	Shoemaker, Herb	Shoemaker, Sandra	Shoemaker, Terrance
Shoenfeld, Sharon	Shoham, Amit	Shonkwiler, Jeanette	Shope, Gary	Shordike, Anne	Shore, David
Shorkey, Tim	Short, Cheryl	Short, Ernestina	Short, Kim	Shortlidgejones, Pamela	Shotwell, Andreia
Shotz, Alyson	Shoulderblade, Magoo	Shoulders, Nikki	Shoulkin, Richard	Shovein, Karen	Showalter, James
Showers, Darren	Showers, Merle	Showersstone, Amy	Shown, Sherrie	Shread, Alicia	Shreves, Diana
Shroyer, Donna	Shuben, Jeffrey	Shugars, Lester	Shuler, H.	Shuler, John	Shull, Donna
Shull, Sandra	Shulman, Joseph	Shulof, Vicki	Shultz Walker, Katie	Shultz, Brian	Shultz, Jamie
Shumaker, H. Dennis	Shuman, Tecari	Shuman, Todd	Shumate, Gayle	Shumate, Lisa	Shumway, Anne
Shupak, Eileen	Shupp, Judy	Shurtz Havelka, Carole	Shushan, Cheryl	Shushan, Robin	Shuter, Melanie
Shutkin, Sara	Shy, Yolanda	Siano, Christiaan	Sibelman, Grae	Sibley, Charlotte	Siddall, Deborah
Siddique, Omar	Siddiqui, Saad	Siders, JO	Sidley, Nathan	Sidofsky, Carol	Sieb, Angie
Siebe, Nikki	Siebel, Bruce	Siebenaler, Elaine	Siebenaler, Elizabeth	Sieck, Joanne	Sieff, Andrew
Siegel, Ken	Siegel, Mel	Siegel, Melvin	Siegel, Ms Adrian	Sieger, Jane	Siegmann, Eric
Siegmann, Suzy	Siegner, Sandra	Siegrist, Anne	Siegrist, Toni	Siegwald, J.B.	Sieira, Raz
Sielaff, Bruce And Mary	Sielaff, David	Siemer, Gary	Siemion, Tish	Siems, Barbara	Sienknecht, Nancy
Sienkowski, Renee	Siens, Susan	Sieranski, Jadwiga	Sierra, Denise	Sierra, Louis	Sievers, Michele
Sievert, Gunnar	Sifuentes, D.G.	Sigal, Lucien	Sigala, Patrick A.	Sigel, Liz	Sigler, J
Sigler, Teri	Signalness, Penny	Signor, Richard	Sigut, Dennis	Sikes, Lewis	Sikina, Heidi
Sikirica, Chloe	Silan, Sheila	Silberstein, Frank	Silguero, Lisa	Silin, Jimmy	Silk, Elaine

Sill, Marjorie	Sillasen, Becky	Sille, Fenna	Silleck, Bob	Silliman, Sylvia	Silliman-french, Lisa
Sills, Alma	Sills, Carol	Silva, Ana	Silva, Clayton	Silva, Jennifer	Silva, Kay
Silva, Marcos David	Silva, Marilyn	Silva, Miguel	Silva, Stephanie	Silva, Stephen	Silva, Suzanne
Silva, Welthy	Silvaggi, Rebecca	Silva-goyo, Maria	Silvana, Comacchio	Silvano, Liliana	Silvas, Carol
Silver Eagle, Aeyrie	Silver, Brigitte	Silver, C.e.p., Ronald H.	Silver, Jack	Silver, Joy	Silver, Victoria
Silverberg, Ellen	Silverberg, Joann	Silverio, Alexander	Silverman, Barbara	Silverman, Morey	Silvern, Cathy
Silvers, John	Silversmith, Linda	Silverstein, David	Silverstein, Mr And Mrs	Silvestrini, Sasha	Silvey, Sheree
Sim, Jim	Sima, Gheorghe	Simcox, Shelley	Simek, Andrew	Simel, Jack	Simeone, Sam
Simic, Zlatomir	Simko, Amanda	Simle, Anna	Simmonds, Beatrice	Simmons Md, Timothy	Simmons, Adrienne
Simmons, Amber	Simmons, Andrea	Simmons, Carolyn	Simmons, Cathy	Simmons, Gena	Simmons, George
Simmons, GL	Simmons, Joan	Simmons, Laura	Simmons, Mark	Simmons, Mary Kay	Simmons, Melissa
Simmons, Michael	Simmons, Paula	Simmons, Stephanie	Simms, Cynthia	Simms, Lawrence	Simms, Lisa
Simon, John	Simon, Kristin	Simon, Nancy	Simon, Peter	Simon, Philip	Simon, Susanne
Simon, Tia	Simonds, Barbara	Simone, Francesco	Simonian, Tom	Simonich, Claire	Simonin, Lisa
Simons, David	Simons, Laurie	Simons, Lola	Simonsen, Judith	Simonson, Shawn	Simpkins, William
Simplot, Chasidy	Simpson Sr., Eric	Simpson, Alexandra	Simpson, Brian	Simpson, Dennis	Simpson, Eric
Simpson, George	Simpson, Gregory	Simpson, Joan D	Simpson, Kenneth	Simpson, Pamela	Simpson, Patricia
Simpson, Penny	Simpson, Rebecca	Simpson, Sr. Kathleen	Simpson, Suzanne	Simpson, Wayne	Sims, Amber
Sims, Anna	Sims, Catherine	Sims, Kate	Sims, Layne	Sims, Mary	Sims, Suzan
Sinai, Iris	Sinclair, Judith	Sinclair, Sandra	Sindoni, Jenne	Sindoni, Karen	Sines, Charlotte
Singer, Barbara	Singer, Daniel	Singer, Donald	Singer, John	Singh, Bobby	Singh, Mona
Singh, Vijay	Singler, Carol	Singletary, Christina	Singleton, Christina	Sininger, Lynn	Sink, Dawn
Sink, Randy	Sinn, Donna	Sinnett, Carol	Sinnott, Patrick	Sio, Kevin	Siparsky, Andrea
Sipe, Gary	Sipiora, Alexandra	Siplin, Gregory	Sipocz, James	Siptroth, Michael	Siqueiros, Nemo
Sirb, Alex	Sircar, Subrata	Siroka, Kayla	Sirota, Rochelle	Sirotek, Jonathan	Sirt, Joshua
Sisauyhoat, Vonnie	Sisler, Jesse	Sisto, Dominick	Sitko, Jamie	Sittler, Roseanne	Sivan, Vidya
Sivley, Steve	Siwik, Irene	Six, Francine	Sixta, Nancy	Sixtus, Michael	Skadden, Stuart
Skade, Victor	Skaggs, Kathy	Skaggs, Laurie	Skal, Steven	Skalsky, James	Skalsky, Rebecca
Skandera, Debra	Skarada, Darcy	Skarie, Loren	Skeels, Vicki	Skei, Ingrid	Skelly, K
Skelton, Joanne	Skelton, Julie	Skidgell, Ryleigh	Skies Ludwig, Sandra	Skill, Jacqui	Skillman, Sally
Skinner, Caroline	Skinner, Mark	Skinner, Richard	Skinner, Richard	Skinner-brassard, Gail	Skirvin, Laurence
Skjerven, Colleen	Sklar, Dana	Skolnick, Kate	Skorupa, Joseph	Skosky, Angela	Skotnes, Darren
Skotnicki, Rives	Skowronnek, Carol	Skowronski, Edmund	Skretting, Nick	Skrzysowski, Ron	Skuce, Carla
Skup, Paul	Skurka, Curtis	Skurka, Paul	Skutches, Gregory	Skwara, Aexandra	Skwarek, Richard
Sky, Alison	Sky, Kate	Slack, Donna Marie	Slack, Esward	Slade, Daniel	Slade, Jonathan
Slade, Lory	Sladen, Fred	Slagle, William	Slakter, Judi	Slass, Pamela	Slate, John
Slaten, Connie	Slater, Bruce	Slater, Leigh	Slaton, Nicole	Slattery, Kitty	Slauson, Kevin
Slavens, Cynthia	Slawinski, Katherine	Slayton, Charlene	Sleeper, Stephen	Sleeth, Janet	Slepetz, Stephen
Sletteland, Trygve	Slezak Fritz, Joan	Slife, Patricia	Slifka, Matthew	Slingsby, Bea	Slining, Kenneth
Sliwka, Piotr	Sloan, Julie	Sloan, Lee	Sloan, Linda	Sloan, Suzannah	Sloan, Tom
Sloan, Will	Slocum, Nancy	Slomer, Robert	Sloshower, Jordan	Sloss, Barbara	Slotnick, Lauryn
Slovak, John	Slowe, Tanikka	Slowik, Donna	Slowinski, William	Slowkowski, Pamela	Slusser, Elizabeth
Sluyter, Joyce	Slyfield, Judy	Slyn Davis, Suzanne	Small, Anne	Small, Barbara	Small, Cynthia
Small, James	Small, Joanne	Small, Sally	Smallen, Martin	Smalley, Beverly	Smalley, Toni
Smalls, Patricia	Smallwood, Holly	Smallwood, Tracey	Smarandoiu, Andrei	Smathers, Linda	Smead, Sharon
Smeaton, Roger	Smell, Jennifer	Smeltz, Mark	Smereck, Amy	Smigelski, Linda	Smile, Serenity
Smiley, C. M.	Smiley, Ellen	Smiley, James	Smiley, Kathy	Smilingcoyote, Jean	Smisek, Betty
Smital, Peter	Smith Polk, Shelva	Smith Romanow, Loma	Smith Smith, Gary	Smith, A	Smith, A. E.
Smith, Adrian	Smith, Alice	Smith, Amanda	Smith, Andrea	Smith, Andrew	Smith, Angela
Smith, Angela	Smith, Angie	Smith, Anne	Smith, Arielle	Smith, Aubury	Smith, Barbara
Smith, Barbara	Smith, Bernita	Smith, Bob	Smith, Brenda	Smith, Bret	Smith, Brian
Smith, Bruce	Smith, Bryce	Smith, Camille	Smith, Candace	Smith, Carol	Smith, Catherine
Smith, Cathy	Smith, Chris	Smith, Christian	Smith, Clive	Smith, Con	Smith, Corinne S
Smith, Dania	Smith, Darrell	Smith, David A.	Smith, David L.	Smith, Deanna	Smith, Deborah
Smith, Decker	Smith, Deloris	Smith, Deni	Smith, Dennann	Smith, Dennis	Smith, Diana

Smith, Don	Smith, Donald	Smith, Donald	Smith, Donna	Smith, Doug	Smith, Doug
Smith, Edith	Smith, Edwina	Smith, Elaine	Smith, Elizabeth	Smith, Ellen	Smith, Francis
Smith, G Austin	Smith, Ginny	Smith, Glenn	Smith, Glennis	Smith, Gregory	Smith, Gregory
Smith, Hazen	Smith, Heather	Smith, Helen	Smith, Holly	Smith, Hope	Smith, Imelda
Smith, Irv	Smith, J.T.	Smith, Jackson	Smith, Jada	Smith, Jamie	Smith, Jamo
Smith, Janell	Smith, Jeannie	Smith, Jen	Smith, Jennifer	Smith, Jim	Smith, Jim
Smith, Joann	Smith, John	Smith, John	Smith, Jonathan	Smith, Joyce	Smith, Judith
Smith, Judith	Smith, Judy	Smith, Justin	Smith, Karen	Smith, Karen E	Smith, Karen Melamed
Smith, Kate	Smith, Katherine	Smith, Kathleen	Smith, Kathryn	Smith, Katrina	Smith, Keelan
Smith, Kellie	Smith, Kenneth	Smith, Kenneth	Smith, Kent	Smith, Kevin	Smith, Kevin
Smith, Kim	Smith, Larry	Smith, Laura	Smith, Lawrence	Smith, Lea	Smith, Leslye
Smith, Lib	Smith, Linda	Smith, Linda	Smith, Linda	Smith, Linda	Smith, Linda And Jackson
Smith, Lisa	Smith, Lloyd	Smith, Lori	Smith, Lucia	Smith, Lynn	Smith, M
Smith, Marjorie	Smith, Mark	Smith, Martin	Smith, Mary	Smith, Mary Ann	Smith, Mclean
Smith, Md, Dr Mk	Smith, Melody	Smith, Michael	Smith, Michael	Smith, Michael	Smith, Michael
Smith, Mike	Smith, Nancy	Smith, Nancy	Smith, Natalie	Smith, Nicholas	Smith, Nicole
Smith, Nicole	Smith, Patricia	Smith, Patricia	Smith, Paul	Smith, Peter	Smith, Peter
Smith, Priscilla	Smith, Raymond	Smith, Raymond	Smith, Reggie	Smith, Rita	Smith, Robert
Smith, Robyn	Smith, Ron	Smith, Ronald	Smith, Ronald	Smith, Rosemary	Smith, Sally
Smith, Samuel	Smith, Sandra	Smith, Sandy	Smith, Sarah	Smith, Sarah	Smith, Sheila
Smith, Sherri	Smith, Shirley	Smith, Shirley	Smith, Sian	Smith, Stephanie Lynn	Smith, Suellen
Smith, Susan	Smith, Susan	Smith, Susan	Smith, Susan L	Smith, Suzanne	Smith, Taylor
Smith, Terrence	Smith, Thomas	Smith, Thomas	Smith, Tom	Smith, Tracey	Smith, Tracy
Smith, V	Smith, Vicki	Smith, Walter	Smith, Walton	Smith, Wayne	Smith, William
Smith/hill, Lynn/ed	Smithe, Jack	Smither, Jennifer	Smithhart Guyll, Lisa	Smiths, Greg	Smithwick, Eleanor
Smits, Josine	Smitts, John	Smoak, Copley	Smock, Amanda	Smoker, Art	Smola, B
Smorch, Tom	Smothers, Marian	Smrha, Beverly	Smudin, Carole	Smullen, Barbara	Smyth, Linda
Smyth, M	Smythe, Stewart	Snawadzki, Mark	Sneddon, Laura	Sneden, K	Snell, Karen
Snider, Jay	Snider, Nicole	Snider, Rhonda	Snider, Ronda	Sniezek, Kathy	Snitzer, Eileen
Snively, Margaret	Snooks, Laraine	Snope, David	Snope, Matthew	Snow, Brandon	Snow, Cason
Snow, Janet	Snow, Teri	Snow, Tower	Snowadzky, Barbara	Snowberger, Vince	Snyder, Andrea
Snyder, Ben	Snyder, Brad	Snyder, Branham	Snyder, Diane	Snyder, Donna	Snyder, Doug
Snyder, Douglas	Snyder, Eleanor	Snyder, Howard	Snyder, Jeannie	Snyder, Jennifer	Snyder, Joanne
Snyder, Karen	Snyder, Kathleen	Snyder, Lisa	Snyder, Lori	Snyder, Lynn	Snyder, Nancy
Snyder, Robert	Snyder, Ronaele	Snyder, Tiffany	Snyder, Tina	Snyder, Todd	Soares, David
Soares, Monique	Soba, Linda	Sobanski, Sandy	Sobek, Sandra	Sobel, Marilyn	Sobel, Patricia
Sober, Anton	Sobral, Bianca	Socarras, Jorge	Socarras, Marie	Sochacki, Marcia	Sockness, Jan
Socling, Den	Soden, Tom	Sodrel, John	Sodt, Peter	Soenksen, Mark	Sofio, David
Sohl, Erica	Sokoloff, Deborah	Sol, Carolyn	Solano, Carol	Solari, Jimmey	Solaris, Laila
Solberg, Nancy	Soldavini, Richard	Soler, Fernando	Solesby, Eli	Soletzky, Robin	Solick, Randa
Solin, Meredith	Solis, Daniel	Solis, Sergio	Solitro, Debra	Sollee, James	Solmos, Jon
Solomon Ii, Michael	Solomon, Beverly	Solomon, Edward	Solomon, Kelly	Solow, Jody	Solt, Peter
Soltis, Mary Ann	Solyom, Szilvia	Somaiya, Shruti	Someck, Eli	Somers, Jonathan	Somers, Stephanie
Somerville, Robin	Somme, Stig	Sommerfeld, Barb	Sommerfeld, Beth	Sonde, Susan	Sondermann, Mary
Sonin, John S.	Sonne, Frances	Sonnenberg, Ron	Sonnenblick, Rachel	Sonnenschein, Lotte	Sonoda, Charlotte
Sonoda, Kent	Sontag, Anthony	Sontag, Susan	Soo Hoo, Ian	Soo, Mara	Soodak, Devorah
Sopczak, Tami	Soper, Carol	Soper, Christopher	Soper, Rachel	Soper-o'rourke, Anna-marie	Sopjes, Barbaara
Soprano, AL	Sorce, Kathleen	Soren, Joanna	Sorensen, Elaine	Sorensen, Lenore	Sorensen, Pamela
Sorensen, Susan	Soresi, Francis	Sorg, Susan	Soria, Peter	Soroos, Carol	Sorozan, Maria
Sorrell, Mary Evelynn	Sorrells, James	Sorsdahl, Shawn	Sosa, Elizabeth	Sosa, Libby	Soteropoulos, Patricia
Soth, Robert	Sothern, Robert	Soto, B.	Soto, Chris	Soto, David	Soto, Doreen
Soto, Robert	Soto, Yanira	Sotomayor, Nora	Soto-vigil, Che	Sottile, Lisa	Souchock, Scott
Soucy, Pat	Souder, Ruth Kay	Soule, Marjorie	Soulias, Audra	Soulier, Ruth	Souphab, Milee
Sousa, Glenn	Sousa, Richard	Soussou, Helen	South Brevard, Humane Society	South, Betty	Southard, Mary

Southwick, Alan	Southworth, Daniel	Souto, Isabel	Souza, Mike	Souza, Paul	Sovereign, Jack
Sovran, Vivian	Sow, Ahmadou	Sowle, Ohmar	Space, Susan	Spacek, Pamela	Spaeth, Elisabeth
Spaeth, Thea	Spahn, Debbie	Spahr, Todd	Spain, Janet	Spake, Ann	Spake, Deanna
Spako, Brian	Spalding, Anne	Spalt, Amanda	Spangler, Dena	Spann, Bridget	Spann, Cody
Spann, Martha	Spano, Michele	Spanogle, Vicki	Spanski, Linda	Spar, Jon	Spare, Rosemarie
Sparks, Carole	Sparks, Diane	Sparks, Kirk	Sparks, Mary L.	Spataro, Jewell	Spatzrabinowitz, Elaine
Spaulding, D	Spaulding, Shelly	Spaulding, Stephen	Spayd, Regina	Speakman, David	Spear, Carla
Spear, David	Spear, Wanita Terry	Spears, Carrol	Spears, Harvey	Spears, Sandy	Specht, Liz
Speciale, Samuel	Spector, Cheryl	Speece, Tim	Speed, Andrea	Speer, Rich	Speicher, Sandra
Speidel, Kurt	Speights, Jaclyn	Speirs, Timothy	Spelbring, Sally	Spellman, Arianna	Spellman, Sue
Spence, Kathryn	Spence, Kathy	Spence, Kimberly	Spence, Liter	Spence-evans, Janet	Spencer, Amy
Spencer, Donald	Spencer, Ellen	Spencer, Gayle	Spencer, James	Spencer, Janice	Spencer, Jeffrey
Spencer, Jeremy	Spencer, Karen	Spencer, Kate	Spencer, Kathleen	Spencer, Kimberly	Spencer, Maria
Spencer, Martha	Spencer, Sandra	Spencer, Steph	Spencer, Susan	Spencer, Tabitha	Spencer-cobb, Susan
Sperber, Julie	Sperling, Mary Ellen	Spero, Thomas	Sperry, Carol	Sperry, Linda	Spetsieris, Jerry
Spicer, Jeanine	Spicer, Sara	Spicer, Vivi	Spiegel, Hazel S.	Spiegel, Ross	Spiegelberg, Barbara
Spiegelman, Joel	Spier, Deborah	Spierings, Muriel	Spiezio, Joseph	Spike, Marie Estelle	Spiker, Carol
Spiker, Jennifer	Spilman, Dan	Spilsbury, Delaine	Spinks, Joyce	Spinks, Mary	Spinney, Jane
Spirakis Dziurka, Jennifer	Spiro, Janet	Spittel, Richard	Spitz, Danielle	Spitz, Dawn	Spitz, Jon
Spivey, Julia	Splan, Mary	Spock, AL	Spoerl, Tod Alan	Spofford, Andrew	Spoke, Julia
Sponseller, Dan	Spoon, Cynthia	Spotts, Earle	Spotts, Richard	Spradley, Karen	Spradlin, Michael
Sprafka, Carol	Sprager, L.	Spragett, Eric & Cedra	Spragg, Alma	Sprague Kolb, Rebekkah	Spratt, David
Sprehn, Jessica	Spring, Karola	Springen, Betty	Springer, Haskell	Springer, John	Springer, Judith
Springer, Sherry	Sprissler, Jaimy	Sproless, Suzanne	Spross, Suzanne	Sprouse, Margaret	Sprouse, Melissa
Spry, Tom	Spude, Amy	Spurlin, Timothy	Spurling, Kendra	Spurling, Leslie	Spurling, Sherry
Spurlock, Katie	Spyker, David Jay	Spyker-duncan, Kasi	Spyridakis, Kathrina	Squeglia, Anita	Squire, Christopher
Squire, Julie	Squires, Chris	Squires, Emma	Squires, Joan	Squres, Fred	Sr, John
Srark, Janice	Sreenivasan, Samhitha	Srnoguy, Lilyana	Sstiener, Joseph	St Angelo, R	St Cyr, Iaina
St Germaine, Gerald	St John, Richard	St Louis, Paul	St. Clair, Betty	St. George, William	St. John, Bridget
St. John, Chris	St. John, Elizabeth	St. John, Linda	St. Peter, Sara	St. Pierre, Marjorie	St.pierre, Angelique
Staab, Alfred	Stabile, Michael	Stabinski, Lea	Stacey, Brenda	Stachnik, Holly	Stacholy, Gloria
Stack, Andrew	Stack, Jim	Stackman, Marshall	Stacks, Lani	Stadler, Debra	Staff, George
Stafford, Dawn	Stafford, Georgia	Stafford, M. A.	Stafford, Richard	Stafford, Robert	Stage, Lavonne
Stagis, Mike	Stagnitta, Gayle	Stagno, Domenic	Stahel, M. Elizabeth	Stahl, Gary	Stahl, Michele
Stakun, June	Staley, Lisa	Staley, Sheri	Stalker, Joanna	Stallman, Richard	Stallone, Craig
Stalnaker, Jaime	Stalnaker, Ward	Stalsworth, Wayne	Stalsy, Amanda	Stalter, Marlene	Stambaugh, Luke
Stambaugh, Mark	Stambaugh, Vonnie	Stamm, Gail	Stamm, Glenn	Stamm, James	Stamm, Nancy
Stamm, Patricia	Stammers, Jonathan	Stamos, Antonios	Stamos, James	Stamp, Barbara	Stampfer, Martha
Stamps, Jennifer	Stanback, Fred	Stanberry, Beth	Stander, Thomas	Standish, Bob	Standridge, Gregg
Stanfield Jr., Wayne	Stanfield, Maggie	Stanfield, Wayne	Stanford, James	Stanford, Suzanne	Stanger, Andrew
Stangle, Jeanne	Stanislowsky, Mary Ann	Staniszewski, John	Stanke, Sharon	Stankiewicz, Peter	Stankye, Karen
Stanley, Brian	Stanley, Cara	Stanley, Doris	Stanley, Laurel	Stanley, Lolette	Stanley, M
Stanley, Mary	Stanley, Richard	Stanley, Terri	Stannard, Barbara	Stanojevic, Erica	Stansberry, Sally
Stansbery, Karen	Stansbury, Angelica	Stansbury, Jeffrey	Stansfield, Jack	Stant, Kate	Stanton, Barbara
Stanton, Barbara	Stanton, Carol	Stanton, Hannah	Stanton, Leigh	Stanton, Lonnie	Stanton, Neil
Stanton, Staci	Stanton, Sylvia	Stanzani, Tiziana	Stapelman, Neil	Stapler, Carl	Staples, Dan
Staples, Eric	Staples, Karen	Staples, Laura	Stapleton, Larry	Star, Morning	Star, Star
Starchylde, Khier	Stargrove, Mitchell	Stark, Joseph	Stark, Sandra	Stark, Shelley	Stark, Sherron
Starke, Dave	Starkovich, Rachael	Starks, Hilary	Starlin, Clay	Starnes, Capri	Starnes, Margaret
Starr, Edward	Starr, Leslie	Starr, Sheldon	Starr, Yumiko	Starrett, Nancy	Starseed, Lozz
Startk, Alexis	States, Marcia	Stats, Laura	Staub, Glenn	Stauber, Steve	Staudacher, Dan
Staudt, Deb	Stauffeneker, Emily	Stauffer, Ellen	Stauffer, Georgia	Stauffer, Janet	Stauffer, Marcia
Staugas, Janice	Stauner, Norman	Staunton, John	Stava, Michelle	Stavis, Alex	Stawasz, Chris
Stawinoga, Greg	Stayte, Sara	Stead, Patricia	Steadmon, Jason	Stearley, Pamela	Stearns, Joan

Stearns, Robert	Stearns, Wat	Stebbings, Barrie	Steber, Maureen	Stechi, Lyn	Steck, Sara
Stedman, Deborah	Stedman, Matt	Stedman, Tanya	Steedman, Tim	Steele, Cheryle	Steele, Cindy
Steele, David	Steele, Eric	Steele, Heather	Steele, Heather	Steele, Judy	Steele, Karen
Steele, Leslie	Steele, Lisa	Steele, Louis	Steele, Richard	Steele, Richard	Steele, Steven
Steen, JO	Steen, Simon	Steenhoven, Jon	Steensma, Monica And Hugo	Steere, M	Steese, Laurie
Steevens, Charles	Steeves, Robin	Stefacek, Laura	Stefano, Courtney	Stefano, Courtney	Stefano, Ivan
Stefano, Lori	Steffens, Beverly	Stegall, Robin	Steger, Linda	Steger, Ruth	Stegmeierp, Apostle Paul
Stehle, Alice	Steidl, Uli	Steier, Philip	Steigauf, Brady	Steiger, Bonnie	Steiger, Lisa
Steil, Ashleigh	Steil, Sara	Steil, Valerie	Stein, Alan	Stein, Diana	Stein, Diane
Stein, E	Stein, Ewa	Stein, Herbert	Stein, Howard	Stein, Ken	Stein, Laurel
Stein, Marc	Stein, Michael	Stein, Rochelle	Stein, Ronald	Stein, Tim	Steinauer, Kay
Steinbach, Jonathan	Steinberg, Gail	Steinberg, Jane	Steinberg, Robert	Steinbrecher, Kathy	Steiner, A.L.
Steiner, Kay	Steiner, Steffi	Steinfeld, John	Steinfeld, Michael	Steinhart, Carol	Steininger, Lorenz
Steininger, Robert	Steinmetz, Lee Ann	Steisel, Jane	Steitz, Diane	Steitz, Mimi	Stellato, Vickie
Stelz, Sandi	Stelzer, Paula	Stelzer, Samantha	Stenberg, Bill And Fran	Stenflo, Jahnavi	Stengl, Bruce
Stennes- rogness, Suzanne	Stenzel, Gary	Stepan, Wm. & Judith	Stepanova, Jekaterina	Stepanski, Doris	Stepanski, Dusty
Stephan, Roberta	Stephen, Ariana	Stephens, Brenda	Stephens, Catherine	Stephens, Chandra	Stephens, Frederic
Stephens, Jessica	Stephens, Jon	Stephens, Judith	Stephens, Kat	Stephens, Katherine	Stephens, Linn
Stephens, Ruth	Stephens, Tom	Stephens, William	Stephensbowen, Delena	Stephenson, Ellen	Stephenson, Jennie
Stephenson, Susan	Stepnicka, Sara	Sterling, Kaylah	Stermer Sr, David L	Stern, Carole	Stern, Dr. Myron
Stern, Joe	Stern, Marilyn	Stern, Richard	Stern, Shelley	Stern, William	Sternberg, David
Sternberg, Laura	Sterner, Daniel	Sterner, Jim	Stetler, David	Stettner, Arianthe	Steuck, Greg
Steuer, S	Steve Jr., Charles	Steven, Carmon	Stevens Ii, A.	Stevens, Andrea	Stevens, Anne
Stevens, Anthony	Stevens, Cristiane	Stevens, Dan	Stevens, Dennis	Stevens, Diana	Stevens, Gary
Stevens, Grant	Stevens, Jane	Stevens, Linda	Stevens, Lynn	Stevens, M	Stevens, Martha
Stevens, Patricia	Stevens, Paula	Stevens, Sheila	Stevens, Summer	Stevens, Susan	Stevens, Suzanne
Stevens, Trish	Stevens, Wanda	Stevens, Wendy	Stevenson, Barbara	Stevenson, Cynthia	Stevenson, Eric
Stevenson, Janie	Stevenson, Joey	Stevenson, Mary	Stevenson, Nancy	Stevenson, Noreen	Stevenson, Richard
Stevenson, Sandra	Stevenson, Sebastian	Stevensonking, Annie	Stevesand, Patricia	Steward, Jack	Stewart, Adam
Stewart, Andrea	Stewart, Anika	Stewart, Ayoola	Stewart, Betty	Stewart, Bob	Stewart, Brenda
Stewart, Christina	Stewart, Don B	Stewart, Donna	Stewart, Elva	Stewart, George	Stewart, Jacqueline
Stewart, Jan K	Stewart, Jason	Stewart, Jennifer	Stewart, Kara	Stewart, Katherine	Stewart, Laura
Stewart, Leslye	Stewart, Lucretia	Stewart, Margaret	Stewart, Mary	Stewart, Michael	Stewart, Pamela
Stewart, Sarah B	Stewart, Sharron	Stewart, Tammy	Stewart, Terri	Stewart, William	Stewmon, Lori
Steyh, John M.	Sticha, Pat	Stickney, John	Stickney, Karen	Stickney, Michelle	Stiefel, Catherine
Stiene-martin, Anne	Stierlen, Lorelei	Stiff, Eric	Stigger, Treva	Stiler, Jay	Stiles, Kathleen
Stiles, Sheri	Stiley, Sean And Amber	Still, Christopher	Stillman, Cindy	Stillman, Don	Stillwell, Jerri Ann
Stilwell, Kathleen	Stimac, Vickie	Stime, Denise	Stimpson, Lisa	Stimson, Karen	Stineman, Larry
Stinson, Leah	Stinson, Loree	Stipetic, Nia	Stirton, Gaylen	Stiteler, Ellin	Stites, Larry & Phyllis
Stith, Shirley	Stlouis, Marsha	Stoak, Debbie	Stock, Jane	Stock, Linda	Stock, Sandra
Stockdale, Candice	Stockland, David	Stockman, Pamela	Stocks, Christell	Stoddard, David	Stoerrle, Sean
Stofan, Sandra	Stoferle, Vanessa	Stoffer, M Jane	Stofft Katos, Janet	Stogel, Cathy	Stokely, Linda
Stokem, Kenneth	Stoker, Stephen	Stokes, Bettina	Stokes, Jeri	Stokes, Mary	Stolarz, Eileen
Stolfi, Jackie	Stolfus, Mary	Stoll, Judith	Stoll, Maria	Stoller, Ben	Stolove, Herb
Stoltenberg, Elizabeth	Stoltenberg, John And Martha	Stolz, Richard	Stomper, Connie	Stonberg, Richard	Stone Unger, Cynthia
Stone, Darby	Stone, Donna	Stone, Edie	Stone, James	Stone, James	Stone, Jessica
Stone, John	Stone, Karen	Stone, Kim	Stone, Lisa	Stone, Lou	Stone, Mary
Stone, Pamela	Stone, Peter	Stone, Rosalinda	Stone, Sheila	Stone, Shoshanah	Stone, Stephanie
Stone, Theodore	Stoneback, Sharon	Stonebraker, Marilyn	Stoneburner, Barbara	Stoneburner, Susan	Stonecipher, Donna
Stonehawk, Mika	Stoney, Michelle	Stoody, Carol	Stookey, Jeff	Stoops, Ward And Anne	Stopfel, Virginia
Stopka, Wade	Stopke, Doug	Stopyra, Melanie	Stordahl, Eric	Storer, Ruth	Storer, Tim

Storey, Sr., Don	Stork, Maryann	Storm, Laurie	Storthz, Carol	Storwick, Sandra	Stotenburg, Sandara
Stotts, Bruce	Stoudt, Michele	Stoudt, Sandra	Stout, Adriana	Stout, Cheryl	Stout, Joyce
Stout, Mitchell	Stout, Nicolle	Stout, Randal	Stout, Robert	Stoutamyer, Carla	Stoutmoose, Lisa
Stover, Dwight	Stowe, Mary	Stowell, Jaime	Stowell, Jocelyn	Stoye, Guy	Straatman, Berrie
Strader, Dow	Strader, Helen	Strailey, Faith	Strailey, Piers	Strain, Darren	Straley, PE
Strand, Danita	Strand, Mary	Strang, Elspeth	Stranske, Marilyn	Strassell, Mary	Strasser, David
Strasser, E. George	Strasser, Joy	Strate, Kris	Stratford, S. J.	Stratman, Margaret	Stratton, Anthony
Straub, Mary Jo	Straube, Sara	Straubinger, Annette	Strauss, Alan	Strauss, Erin	Strauss, Jennifer
Strauss, Nancy	Strauss, Randy	Strauss, Richard	Straw, Rebecca	Straw, Roger	Strawn, Calypso
Strawn, Mike	Strayer, Karen	Strayer, Karen	Streble, Valerie	Streck, Brittany	Streck, Diane
Strecker, Lynda	Streed, Stephen	Street, Rhett	Streett, Eric	Strelke, Robert	Strempkedurgin, Ryan
Streng, Denise	Streng, Randolph	Stretch, Everett	Strickland, Janet	Strickland, Matthew	Strickland, Susan
Strickland, Tracy	Stricklin, Annie	Strimbu, M J	Stringer, Kari	Stringfellow, Scot	Strobel-mclean, Joan
Stroble, Patricia	Stroble, Sharon	Stroede, Ake	Strohm, Barbara	Strom, Adam	Strom, Carmi
Stroman, Grace	Strombeck, Joyce	Stromberg, Debi	Stromeyer, Alex	Strom-martin, Caitlin	Stromquist, Mary
Strong, Ann	Strong, Grace	Strong, Laura	Strong, Lynn	Strother, Martha	Stroube, Alba
Stroup, Marylyn	Stroupe, Frank	Stroupe, Kerri	Strouse, Glen	Strout, Rebecca	Strubbe, Laurie
Struble, Dan	Struebing, Wesley	Strugatz, Fred	Struss, Francine	Strutz, Jessica	Stryker, K.
Stuart, Adam	Stuart, Annie	Stuart, Melissa	Stuart, Michael	Stuart, Michael	Stuart-jennings, Erin
Stubblefield, William	Stubbs, Jeremy	Stubbs, Marvelyn	Stubbs, Stephanie	Stubs, Peggy	Stuckert, Cindy
Stuckmeyer, Robert	Studt, Patrick	Studulski, Donna	Stuebben, Angela	Stuebing, Edward	Stueckemann, Marjorie And David
Stuemke, Roberta	Stueven, Kevin	Stuhlmacher, James	Stulb, Jeanne	Stump, Shelley	Stumpf, Becca
Sturbaum, Susan	Sturdy, Linda	Sturge, Greg	Sturgeon, Susan	Sturges, Dale	Sturgill, Eileen
Sturgill, Jeffery	Sturino, Angelo	Sturm, Anne	Sturm, Lance	Sturm, Melanie	Stusser, Suzanne
Stute, Elke Elisabeth	Stutheit, Don	Stuverude, Neil	Stvilla, Caroline	Styc, Kathleen	Styers, Steve
Styga, John	Styris, David	Su, Eihway	Su, Shelley	Suarez, Olga	Suarez, Rene
Subach, Daniel	Subjenski, Marion	Sucato, Dorothy	Suchenicz, Carolyn	Sudano, Alice	Sueoka, Laura
Suffin, Dan	Suffriti, S	Sugg, Kathryn	Suggs, Barbara	Suhr, Elva	Suhr, Fred
Suit, Karen	Sujecki, Joy	Sukmawati, Neiva	Sul, Joseph	Sulak, Adrianne	Sulak, Courtney
Sulkoske, Joanne	Sullenger, Sadie	Sulley, Paul	Sullivan, Ann	Sullivan, Ashley	Sullivan, B
Sullivan, Barb	Sullivan, Barbara & John	Sullivan, Brendan	Sullivan, C.	Sullivan, Catherine	Sullivan, Catherine
Sullivan, Deborah	Sullivan, Diane	Sullivan, E. M.	Sullivan, Eric	Sullivan, Fran	Sullivan, Gayle
Sullivan, Gretchen	Sullivan, Jana	Sullivan, Jim	Sullivan, Joan Paul & PJ	Sullivan, Judith	Sullivan, Karen
Sullivan, Kristin	Sullivan, Linda	Sullivan, Linda	Sullivan, Linda	Sullivan, Margaret	Sullivan, Mary
Sullivan, Md, Robert	Sullivan, Michelle	Sullivan, Sandra	Sullivan, Sharon	Sullivan, Stephanie	Sullivan, Susan
Sullivan, Susan A	Sullivan, Tad	Sullivan, Theresa	Sullivan, Thomas	Sullivan, Z	Sully, Nicholas
Sult, Mariyana	Sumarlidason, Arlene	Sumida, Kaytee	Summer, Sharon	Summergrad, Florence	Summers, Amanda
Summers, Angela	Summers, Bonnie	Summers, Brad	Summers, Carolyn	Summers, Jan	Summers, Jessica
Summers, Joanne	Summers, Ken	Summers, Laura	Summers, Susan	Sumner, Jeanette	Sumner, Jeanne
Sumner, Rhonda	Sumpter, Cortney	Sun Flower, Natalie	Sunamoto, Nancy	Sundarajan, Aditi	Sundberg, Rebecca
Sunderman, Shaddrick	Sundin, Joyce	Sundqvist, Pirjo	Sundstrom, Karl	Sunfire, Michael	Sunlake, Tom
Sunshine, Carl	Suozzo, Charles	Suplicio, Ricardo	Sur, Penny	Sur, Sija	Surdyk, Thomas
Surgeary, Margaret	Suriner, Noreen	Surovchak, Paul	Surrence, Katya	Surya, Henry	Suter, Alice
Suter, Lindsay	Sutherland, Elizabeth	Sutherland, Hugh	Sutherland, John	Sutherland, Ross	Sutherland, Sonja
Sutherland, Vickie	Sutliff, Leslie	Sutliff, Willis	Sutton, Constance	Sutton, Geoff	Sutton, Matthew
Sutton, Mike	Sutton, Susan	Sutton, Teresa	Svalya, Karen	Svare, Marlys	Svatek, Carol
Svendsen, Kathy	Svensson, Audrey	Sverdlove, Ronald	Svidler, Mariano	Svoboda, Gordon	Swackhamer, Phyllis
Swafford, Noelle	Swain, Lashaun	Swallow, Pamela	Swan, Alice	Swan, Debral	Swank, Carrie
Swank, Jackie D B	Swann, Kelsey	Swann, Therese	Swansbro, Guy	Swanson, Cynthia	Swanson, Haley
Swanson, J	Swanson, Linda	Swanson, Lorraine	Swanson, Mark	Swanson, Michael	Swanson, Nancy
Swanson, Rob	Swanson, William	Swarbrick, John	Swartout, Terri	Swartz, Kathleen	Swartz, Terrah
Swartzel, Paul	Swartzentruber, Melvin	Sweazea, Alan	Swedberg, Gregory W.	Sweeney, Barry	Sweeney, Catherine
Sweeney, Christy	Sweeney, David	Sweeney, ED	Sweeney, Wesa	Sweeny, Art	Sweet, Barbara

Sweet, Cordia	Sweet, Jessica	Sweet, Justin	Sweet, Sarah	Sweetland, Daisy	Sweetland, Jennifer
Sweetling, William	Sweeton, Margaret	Sweetrocket, Riva	Sweetwater, Danda	Swem Iii, Earl Gregg	Swem, Helen
Swensen, Mara	Swenson, Erik	Swenson, Jean	Swenson, Kyle	Swensonzakula, Kimberly	Swers, Arthur
Swick, Chelsea	Swiemer, Ruth	Swiencicki, John	Swierczek, Luke	Swierszcz, Bernard	Swift, Rob
Swift, Rose-marie	Swift, Shannon	Swift, Sharon	Swigart, Anne	Swihart, Dave	Swimley, Thomas
Swindell, Elak	Swineford, Rhonda	Swink, Josh	Swinney, William	Swirczynski, Sophie	Switalski, Diane
Swoffer, Thomas	Swolinski, Susan	Swopes, Eileen	Swoveland, Maury	Swyden, Barbara	Syben, Gregor
Sydow, Larry	Syed, Ali	Syed, Ali	Syed, Mushtaq	Syen, Helen	Syevick, Sue
Sykes, Wally	Sylvester, Daniel	Sylvester, Karen	Sylvester, Sandra	Symanski, Sally	Symonds, Russell
Syndennis, Brendon	Sytzko, Victor	Syverson, Steve	Szabados, Michelle	Szabo, Andy	Szabo, Camilla
Szabo, Liz	Szabo, Mark	Szal, Mark	Szarek, Phyllis	Szczech, Justyna	Sziklas, Peggy
Szkutnik, Barbara	Szot, Patricia	Szruba, Leonora	Szulc-flissi, Susan	Szumlas, Nick	Szurley, Linda
Szych, Henry	Szymanowski, Paul	Szymcxak, Nancy	Szymczak, Kari	Szymczak, Rafal	T., J.
Tabachnik, Shelley	Tabat, Gregory	Tabb, Amy	Taber, Susan	Tabin, Jean	Taborda, Dr. Freddie
Tack, Martha	Tackett, Dennis	Tackett, Troy	Taddeo, Nicole	Taerbaum, Jody	Taft, Kathleen
Tagawa, Ann	Tagliente, David	Taishoff, Lewis	Tait, Benjamin	Tait, Jhenet	Tait, Shirley
Tajdari, Amy	Takagi, Chris	Takagi, Richard	Takaro, Mark	Takatsch, Julie	Takush, Kathie
Talamini, Jane	Talbert, Chris	Talbert, Ronald	Talbot, Cynthia	Talbot, DI	Talbot, James
Tallant, Deenie	Tallchief Mele, Lucia	Talleagle, David	Talley, Brenda	Talllyn, Peggy	Tallmadge, Dara
Tam, Grace	Tam, William	Tamanaha, Jon	Tamargo, Jorge J	Tami - Worley, Teresa	Tamori, Carolee
Tan, Kristen	Tan, Shirlee	Tanaka, Masayuki	Tande, Joseph	Tandetnik, Igor	Tandy, Mills
Tang, Edward	Tangi, Anna	Tangney, James	Tanimura, Pam	Tanin, Tom	Tank, Austin
Tannenbaum, Nathan	Tannenbaum, Nicola	Tanner, Donna	Tanner, Ellen	Tanner, Gail	Tanner, Jeff
Tanner, Robert	Tanny, Marsha	Tanoury, Mary	Tanyag, Dominique	Tapanova, Ioulia	Tapia, Barbara
Tapia, Nicole	Tapia, R	Tapper, Judith	Tapper, Shannon	Taque, Heather	Tarach, Ronald
Tarallo, Mary	Tarango, Mary	Tarasik, Diane	Tarbi, Nora	Tardif, Mark	Tardiff, Sandra
Tarighi, Ardeshir	Tarin, Teresa	Tarkowski, Brenda	Taroli, Garry	Tarpley, Matthew	Tarpley, Polly
Tart, Lisa	Tartaglia, Christian A.	Tartaglia, Dorothy	Tartaglia, Lauren	Tarver, Glenn	Tarverdians, Andre
Tasayco, Maria Luisa	Tasset, Niurys	Tassinai, Thomas	Tate, Sharon	Tatreau, Jamie	Tatsui-d'arcy, Susan
Tattersall, Ann	Tatum, Jody	Taub, Randy	Tauber, Sharon	Tauber, Sherry	Taunt, Tammy
Taupo, Grace	Tauzin, Norman	Tavaglione, Michael	Tavares, Brooke	Tay, Scarlet	Taylor Iii, James
Taylor, Adrien	Taylor, Audrey	Taylor, Beverly	Taylor, Bill	Taylor, Bronwen	Taylor, Carol
Taylor, Carol	Taylor, Dawn	Taylor, Donald	Taylor, Donna	Taylor, Dr. F	Taylor, ED
Taylor, Edward	Taylor, G	Taylor, Gene	Taylor, Jackie	Taylor, Jean	Taylor, Jennifer
Taylor, Jessica	Taylor, Joan Leslie	Taylor, Joanna	Taylor, John H.	Taylor, Kaye	Taylor, Kelly
Taylor, Kemberle	Taylor, Ken	Taylor, Kim	Taylor, Kimberly	Taylor, Laura	Taylor, Leah
Taylor, Lila	Taylor, Linda	Taylor, Lynn	Taylor, Melvin	Taylor, Nancy	Taylor, Nicole
Taylor, Pat	Taylor, Paul	Taylor, Ronda	Taylor, Scott	Taylor, Shannon	Taylor, Sherry
Taylor, Stefan	Taylor, Susan	Taylor, Susan	Taylor, Tanya	Taylor, Valerie	Taylor, Vicki
Taylorashbaugh, Brandon	Taylor-schaus, Kelly	Te Velde, John	Teach, Jean	Teaford, Ben	Teague, Lori
Teague, Michael	Tecchie, Erika	Tedone, Diane	Tedrick, Daniel	Teed, Cornelia	Teed, Halcyon
Teel, S.	Teel, Travis	Teepen, Paul	Teeters, Rebecca	Teevan, John	Tefertiller, Staci
Teffeteller, Tony	Tegstad, Peter	Teich, Saramae	Teitler, Joan	Tejeda, Carlos	Tejeda, Katira
Telfair Ii, Ph.d., Ray C.	Telleen, Melany	Tellep, Tracy	Telles, Lupe	Telomen, Lisa	Temelini, Audrey
Temme, Olive	Tempelman, Steven	Tempesta, Christi	Temple, Adam	Temple, Debra	Temple, Edward
Temple, Michele	Temple, R	Temple, Terris	Templeton, Kent	Templeton, Sara	Temps, Harriet
Temsamani, Barbara	Ten Pas, Jacob	Tenaglia, Brien	Tenaglia, Carol	Tendler, Marlene R.	Tenenbaum, Debbie
Tenenbaum, Jane	Tenerelli, Brenda	Teneyuque, Tanya	Tennant, Allie	Tenney, Joanne	Tenney, Mike
Tennies, Dorothy	Ter, Dex	Terbrock, Elizabeth	Tercero, Angelica	Terchek, Mart	Teresi, Fran
Termini, Susan	Terrazas, Ana Luisa	Terrell, Charlee	Terrell, Cindy	Terrill, Lynn	Terry, April
Terry, Fran	Terry, Glendora	Terry, Kevin	Terry, Laurie	Terry, Myra	Terry, Robin
Tesch, Rebecca	Tesche, Nicole	Tessari, Diane	Tesser, Daniel	Tetarenko, Pamela	Tetenbaum, Lawrence
Tether, Nancy	Tetoni, Charles	Tetro, Kathleen	Teunissen, Christina	Teuscher, Alfred	Tevelow, Carla
Tezla, Michael	Thacker, Frank	Thacker, Marie	Thackrey, Gale	Thakis, Phyllis	Thaler, Gary
Thanhauser, April	Tharp, Brett	Tharp, Clint	Tharp, Eleanor	Tharp, Julie	Tharp, Reynold
Thatcher, Jim	Thatcher, Tobey	Thayer, Dan	Thayer, John R	Thayer, Leda	Thayer, Margaret

Thayer, Mostyn	The, Barbara	Thebeau, Rayneen	Theis, Diane	Theis, T	Thelen, Deborah
Themm, Caroline	Theobald, John	Theobald, Kathryn	Theobald, Tanya	Theoharis, Nancy	Theriot, Colleen
Thevenot, Trisha	Thibault, Andre	Thibault, Virginia M.	Thibodeau, Dave	Thibodeaux, Vanessa	Thiebaut, Dana
Thiefels, Jane	Thiel, Mary	Thiel, Mary	Thiel, Paul	Thies, Karen	Thies, Rocky
Thiessen, Sidney	Thing, Susan	Thixton, Saundra	Thoburn, Robert	Tholin, Barbara	Tholl, Jonathan
Tholl, Patricia	Thollaug, Julia	Thomann Tewarson, Heidi	Thomas, Abigail	Thomas, Amelia	Thomas, Ancy
Thomas, Bob	Thomas, C	Thomas, Chris	Thomas, Clara	Thomas, Dayna	Thomas, Debbie
Thomas, Denise	Thomas, Dottie	Thomas, Dr. Susan	Thomas, Eleanor	Thomas, Elissa	Thomas, Eva
Thomas, Gail	Thomas, Gayle	Thomas, Gregory	Thomas, Hannah	Thomas, Jacqueline	Thomas, James
Thomas, James	Thomas, Jamie	Thomas, Jason	Thomas, Jeffrey	Thomas, Jennifer	Thomas, Jim
Thomas, Joan	Thomas, Joanie	Thomas, John	Thomas, Justin	Thomas, Kat	Thomas, Kathleen
Thomas, Kimberly	Thomas, Kristin	Thomas, Matt	Thomas, Michael	Thomas, Patricia	Thomas, Patricia
Thomas, Paul	Thomas, Rachel	Thomas, Randy	Thomas, Robert	Thomas, Rochelle	Thomas, Sally
Thomas, Scott	Thomas, Sijo	Thomas, Stephen	Thomas, Susan	Thomas, T	Thomas, Teresa
Thomas, Tim	Thomas, Todd	Thomas, Tom	Thomas, Toni	Thomas, Trevor	Thomas, Valerie
Thomas, William	Thomasbaxter, Gayle	Thomasbrown, Pauline	Thomasdale, Sandra	Thomason, Christopher	Thomason, Laura
Thomasson, Robert	Thomasson, Tabitha	Thomborson, Barbara	Thometz, David	Thomlinson, Gisela	Thompson, AJ
Thompson, Angela	Thompson, Anne	Thompson, Carlyon	Thompson, Carrie	Thompson, Cat	Thompson, Dana
Thompson, Daniel	Thompson, Deb	Thompson, Don	Thompson, Don	Thompson, Dorothy	Thompson, Edquna
Thompson, Eileen	Thompson, Gary	Thompson, Gay	Thompson, Geoffrey And Paula	Thompson, Gerald	Thompson, Ivan
Thompson, Janice	Thompson, Janis	Thompson, Jeff	Thompson, Jennie	Thompson, Jennifer	Thompson, Julie
Thompson, Keith	Thompson, Ken	Thompson, Kris	Thompson, Lorraine	Thompson, Lynn	Thompson, Marshall
Thompson, Matthew	Thompson, Michael	Thompson, Michelle	Thompson, Nancy	Thompson, Nancy	Thompson, Natalie
Thompson, Pamela	Thompson, Pat	Thompson, Patricia	Thompson, Roberta	Thompson, Ronald	Thompson, Rose
Thompson, Sally	Thompson, Steve	Thompson, T J	Thompson, Thomas	Thompson, Thomas	Thompson, Tracy
Thompson, Tricia	Thompson, William	Thompsontucker, Alysa	Thoms, Larry	Thomson, Christina	Thomson, Curtis
Thomson, Jeanne	Thomson, Joy	Thomson, Judy	Thomson, Maria	Thomson, Valerie	Thonet, Kathi
Thorbjornsen, Brian	Thoresen, Simon	Thoreson, Lisa	Thorin, Lisa	Thorley, Douglas	Thornburg, Merrie
Thorne, Eugene	Thornley, Melissa	Thornsbury, Jean	Thornton, Deborah	Thornton, J. Fred	Thornton, Leonard
Thorpe, Mary	Thorson, Denny	Thorson, Thomas	Thorsson, Leanne	Thorstensen, Christine	Thorvaldson, Jennifer
Thorward, Minda	Thrailkill, James	Thrall, Melanie	Thrash, Maggie	Threet, Melinda	Thryft, Ann
Thu, Eric	Thummel, Hans	Thunell, Ashley	Thurairatnam, Susan	Thurber, Doris	Thurmond, Roberta
Thurn, Clement	Thurston, Barbara	Thyberg, Marya Lucca	Tibbets, Linda	Tibbetts, Jean	Tiberi, Steven
Ticali, Dawn	Tice, James	Tice, Susan	Tichman, Nadya	Ticknor, Matilda	Tidwell, James
Tierce, Kyle	Tierney, Anne	Tierney, Cornelia	Tierney, Edward	Tierney, Leslie	Tieso, Jovita
Tift, Linda	Tigerlily, Eliot	Tilden, Charley	Tilden, Rebecca	Tildes, Katherine	Tildsl, Laura S
Tilley, Brandon	Tilley, Justine	Tilley, Rose	Tillman, Barbara	Tillman, Grace	Tillman, Henry
Tillotson, James	Tilton, Melody	Tilwalli, Dhruva	Timken, Jane	Timlin, Teresa	Timmerman, Judith
Timmins, M	Timmis, Laura	Timms, Garry	Timoya, Akiba	Timpe, Eugene	Tindall, Travis
Tindall, Vicky	Tindol, Lolly	Tine, Tina	Tinelli, Gina	Tineo, Vivian	Tinker, Cathy
Tinsley, Brenna	Tinsley, Gail	Tioran, Joanne	Tippens, Rebecca	Tippens, Sonette	Tippett-smith, Sandy
Tippin-moody, Mary	Tipple, Michael	Tirado, Christina	Tirisacco, Frank	Tirone, Deb	Tirrell, Chris
Tischler, Bruce	Tisdale, David	Tisdell, Jennifer	Tiseo, Troya	Tisher, Ruth	Tissavary, John
Tissier, Raymond	Tittle, James & Yvonne	Tizard, Thomas	Tlustos, Margaret	Toadvine, Ted	Tobey, Libby
Tobias, Justin	Tobiasson, Cyril	Tobin, Maryann	Tobin, Ralph	Tobin, Sue	Tobolski, Kelly
Tocci, Carmine	Tocher, Beatrice	Toczylowski, Jessica	Todd, Craig	Todd, David	Todd, George
Todd, Janis	Todd, Kalita	Todd, Lori	Todd, Martha	Todd, Nic	Todd, Richard
Todd, Susan	Todd, Susan N	Todd, Zachary	Todia, Gena	Todnem, David	Todor, Jeffrey
Toedtlasseigne, Heather	Tokareff, Ray	Tokarski, Elaine	Tokarskyunda, Louise	Tokarz, Joan	Toland, Madeleine
Tolbert, Berlinda	Toledo, Alex	Toliver, Tricia	Toller, April	Tolley, Mark	Tolley, Patricia
Tolman, Kathleen	Tolpin, Mark	Tomajko, Debra	Tomasello, Dana	Tomasik, Amanda	Tomazic, Mike

Tomczyk, James And Joan	Tomczyszyn, Michael	Tomeo, Janet	Tometrini, Phil	Tomlin, Greg	Tomlinson, Andrew
Tomlinson, Linda	Tomlinson, Rebecca	Tomme, Laurie	Tompkins, Patricia	Tompt, Tim	Tomsky, Andy
Tonegawa, Kathy	Toner, Patricia	Tong, Kevin	Tonkin, Gary	Tonnemacher, Georgina	Tonnes, William
Toohey, Daniel	Toole, Kristen	Toppen, MJ	Topping, N	Torain, Andreia	Torbert, Stephanie
Torgerson, Eric	Torget, Marie	Torkzadeh, Rita	Tornabene, Michele	Tornicelli, Susan	Torok, Carole
Torok, Joan	Torosdag, Iwona	Torre, Monica	Torrence, Lisa	Torres, Jose	Torres, Lorraine
Torres, Marianella	Torres, Philip	Torres, Rodrigo	Torres, Susan	Torres-ortiz, Ramon	Torretta, Ron
Tortorella, Richard	Tory, Rachel	Tosco, Yadira	Toth, A	Toth, Mary Beth	Toth, Tracey
Totman, Alex	Touchstone, Lana	Tourville, Jon	Tousey-pfarrer, Sean	Toussaint, Akena	Toussaint, Beth
Tova, Susan	Tovar, John	Toven, Wayne	Tovey, Tamara	Towbin, Martin	Towers, Dan
Towers, Gloria	Towey, Charlotte	Towle, Dawn	Town, Carolyn	Towner, Erline	Townill, Linda
Townsend, Cherie	Townsend, Diana	Townsend, Heather	Townsend, Katherine	Townsend, Patricia	Townsend, Peter
Townsend, Sarah	Townsend, Tita	Townsend, Trisha	Townsley, Mavis	Townsley, Paula	Towry, Paula
Towsen, Nat	Toy, Zena	Toyohara, Karen	Tozer, Linda	Tozzi, Suellen	Tracey, Helen
Tracy, Anne	Tracy, Nancy	Tracy, Ray	Tradii, Mary	Traina, Jimmy	Trainer, Anne
Tramel, Sophie	Tran, Dat	Tran, Helen	Tran, Lawrence	Tran, Mary	Tran, Sheila
Traniello, Francine	Trantules, Susan	Tranzillo, J	Trapani, J	Trattner, Dana	Traube, Patty
Traugott, Marilyn	Traum, Norman	Trauth, Beti	Traver, Willoe	Travers, Melissa	Travis, Dianne
Travis, Edwin	Travis, Judi	Travis, Priscilla	Travis, Terence	Travis, Teri	Travis, Terry
Traweek, Jim	Traxel, Walter	Traxler, Matthew	Traywick, Mary	Treadway, Roy	Treat, Lynne
Trebing, James	Trecartin, Judi	Trecartin, Larry	Tredici, Anthony	Tredinnick, Catherine	Treece, Michael
Trees, Mary	Trees, Scott	Treffinger, Cheri	Treffinger, Katherine	Tregidgo, Richard	Treiber, Terry
Treichler, Elizabeth	Trejo, Catherine	Treleven, Natalie	Tremper, Alexandra	Trenchard, Thomas	Trengove, Thomas
Trent, Sharon	Trentlyon, Betty	Treon, Martin	Trepanier, Helen	Treppeda, Cassandra	Trescone, Thomas
Trethaway, Dale	Tretter, Tara	Trettner, Janet	Treuil, Marilyn	Treumann, Brittny	Trever, James
Trevillian, Linda	Trevino, Lucy	Trevithick, Deborah	Trewartha, Cynthia	Trewin, Kat	Treworgy, Bonnie
Treworgy, Mary Alice	Trexler, Alice	Triana, Antonio	Trick, Cathy	Trickey, Eileen	Triggs, Lori
Trimm, James	Trimm, Jeremy	Trinkaus, Emily	Tripp, Do, Phd, Kim	Tripp, Tom	Tripp, William
Trippet, Will	Tripp-schaefer, Sky	Trischka, Aurora Dale	Trochanowski, Bonnie	Troeger, Joelle	Troiber, Mike
Troland, Mary	Trombly, Merrilyn	Tronolone, Tracey	Tropiano, Emilie	Trosky, Donald	Trosper, Georgia
Trotsky, Matthew	Trott, Susan	Trotter, S.	Troutman, Bruce	Troutman, Phil	Troutman, Victor
Troutt, Mary	Trover, Larry	Trowbridge, Andrew	Trowbridge, E H	Troyano, Paul	Trubov, Nickolas
Trudeau, Denise	Trudeau, Margaret	Trudeau, Tim	Trudell, Kathleen	TRUE, Adele	TRUE, Jim
TRUE, Mary	Truesdale, Krissy	Trufan, Hal	Trujillo, Carmen	Trujillo, Fred	Trujillo, Victoria
Truman, Mary	Truman, Melissa	Trumble, William	Trumbull, Barbara	Trumbull, Mark	Trumbull, Ramon
Truong, Thanh	Trussell, Carol	Trusty, Kristen	Trutter, AL	Trychta, Julianne	Tryggeseth, Jackie
Tryon, Laura	Tsang, Tony	Tsantilis, Senta	Tsao, Fritz	Tschida, Tony	Tseng, Laura
Tshibangu, Mandy	Tsika, Noah	Tsitsivas, Laurie	Tsujimoto, Kristine	Tsung, Dia	Tuazon, Josefina
Tublin, Dian	Tuch, Christopher	Tucholski, John	Tucker, Arlen	Tucker, Barbara	Tucker, Bill
Tucker, Brent	Tucker, Bruce	Tucker, Carol	Tucker, K.	Tucker, Karen	Tucker, Mariann
Tucker, Marlene	Tucker, Michael	Tucker, Michael	Tucker, Paula	Tucker, Roberta	Tucker, Roger
Tucker, Ruth	Tucker, Susan	Tuckett, Natasha	Tuckkness, John	Tuesday, Allie	Tugwell, Thomas
Tuke, Carla	Tuley, Midge	Tulik, Margaret	Tull, Jack	Tulli, Jackie	Tullis, Jan
Tulloch, Hilary	Tulys, Walter	Tuma, Mary	Tuman, Susan	Tumarkin, Laurel	Tuminski, Elizabeth
Tumpson, Daniel	Tumulty, Matt	Tunick, Erika	Tunno, Mark	Tuohey, John	Tuomey, Ann Ellen
Tupper, Thomas	Turbak, Andrea	Turbush, Heather	Turcich, Mary	Turcotte, Barbara	Turetsky, Samantha
Turicchi, Kelly	Turken, Donald	Turksel, Judy	Turman, Donna	Turnbull, Wendy	Turner, Barbara
Turner, Carol	Turner, Catherine	Turner, Channing	Turner, Cheryl	Turner, Daniel	Turner, David
Turner, Dawn	Turner, Doris	Turner, Douglass	Turner, Geo	Turner, Gina	Turner, Gregory
Turner, Jennifer	Turner, Kathleen	Turner, Kristi	Turner, Laura	Turner, Lloyd	Turner, Martha
Turner, Mike	Turner, Phyllis	Turner, Robert	Turner, Robin	Turner, Sherri	Turner, Susan
Turner, Tammi	Turner, William	Turney, John	Turnoy, David And Geri	Turnquist, Debra	Turon, Paulette
Turowski, Anamyn	Turpin, Jan	Turrentine, Rogers	Turton, Carol	Tweedale, Tony	Twillman, Richard
Twist, Shannon	Twitmyer, Jane	Twombly, Glen A	Tye, Claudia	Tylczak, Katherine Alice	Tyler, Jan

Tyler, Ph.d., Margaret G	Tyler, Sara	Tyler, Wesley	Tylo, Terri	Tynan, David	Tyndall, Carl
Tyndall, Janet	Tyndall, Lucy	Tyner, Paula	Tyner, Sue	Tyree, Louise	Tyriver, Marcia
Tyson, Stan	Tzazu, Hili	U, R	Uchmanowicz, Barbara	Ucko, Aaron	Udall, Nicholas
Udovch, Joseph	Uecker, Robert	Ueki, Marian	Uff, Robin	Uffer, Janet	Ugolotti, Annamaria
Ugulini, Nicole	Uhl, Eleanor And Alice	Uhl, Henny	Uhlir, Christina	Uhll, Linda	Uhte, Laverne
Ujcic, Albert	Ukockis, Ann	Ulasz, Jeanne	Ulibarri, David	Ullman, Sara	Ullmer, Beth
Ulman, Barbara	Ulman, Melodie	Ulmer, Richard	Uloth, D.jeffery	Ulrey, Larry	Ulrich, Eugene
Ulrich, Linda	Ultican, Lanna	Umbarger, James & Sue	Umnus, Jane	Underwood, Dennis	Underwood, Lena
Underwood, Stephen	Unfried, Amy	Unfried, Steve	Ungar, Elizabeth	Ungaro, Rocio	Unger Spiegelman, A. Robin
Unger, David	Unger, Diana	Unger, Janna	Unger, Jay	Unger, Lpcc, Pamela	Unger, Nathaniel
Unger, Roni	Unmack, Chanda	Unrau, Pam	Unruh, Alexa	Unruh, Jerry	Unseld, Monica
Untulis, Charles	Upchurch, Bailey	Updegraph, Charles	Uppgaard, Heidi	Uransky, Gayna	Urbach, Amen
Urban, Amy	Urban, Carol	Urban, Donna	Urban, Nancy	Uribe, Gladys	Uribe, Gloria
Urich, David	Uriella, London	Urkiel, Richard	Urquhart, Steven	Urso, Barbara J	Ushiba, Kathy
Usoff, Karen	Utermohle, Garry	Utigaard, Nina	Utt, Virginia	Utter, Carla	Utton, Beth
Utz, Holly	Utzman, Anna	Uxa, Nicholas	Uzmed, Arlene	V, Jenny	V., Linda
Vaca, Jenny	Vacca, Giancarlo	Vaccaro, Terry	Vacek, Doug	Vacek, Patrick	Vachon, Adelia
Vachula, William	Vaessen, Peter	Vaeth, Drew	Vahila, Michael	Vaid, Reena	Vail, William
Vaill, Gragg	Vaillancourt, Michele	Vainder, Susan	Valade, Jerry	Valadez, Patricia	Valadon, Christine
Valamanesh, Fereshteh	Valance, Liberty	Valbuena, Miguel	Valdez, Adela	Valdez, Amy	Valdez, Amy
Valdez, Leeann	Valdez, Patricia	Valdez/gamble, Alan/debra	Valdivia, Susan	Vale, Fay	Valencia, Suzanne
Valente, Donna	Valentine, Debbie	Valentine, Leslie	Valentine, Sarah	Valentini, Karen	Valentino, Christopher
Valenzuela, Carolina	Valero, Maudie	Valerugo, Katherine	Valianti, Deborah	Valiga, Susan	Valint, Carol
Valle, Lucy	Vallianos, Peter	Vallin, Angelica	Vallon, Amanda	Valone, Dorothy	Valum, Ben
Van Aken, Richard	Van Arsdale, Jay	Van Arsdale, Robert	Van Asten, Michelle	Van Bergen, Jo Ann	Van Brown, Juli
Van Burg, Chera	Van Buskirk, Serena	Van Camp, Barbara	Van Camp, Rachel	Van Cleave, Link	Van Cleve, Val
Van Dam, Devon	Van De, Tom	Van Dellen, Jeff	Van Den Bossche, Gerardine	Van Der Hout, Jackie	Van Der Mark, Shari
Van Der Walt, Maritha	Van Dorn, Carolyn	Van Dunk, Fay	Van Dyk, Margaret	Van Dyke, Nancey	Van Eck, Dona
Van Gage, Sheliey	Van Gerven, Claudia	Van Haaften, Jane	Van Helvoort, Heather	Van Herik, Judith	Van Hookkirschke, Tonyapatricia
Van Horn, John	Van Horn, Sandra	Van Huijkelom, Hans	Van Hulsteyn, Grace	Van Jaarsveld, Samuel	Van Kirk, Adam
Van Laningham, Ruth	Van Lear, Tom	Van Leunen, Alice	Van Lingen, Claude	Van Loo, Randy	Van Ness, Denali
Van Niekerk, Anny	Van Oers, Tricia	Van Pelt, Nicole	Van Pelt, Scott	Van Riper, Michael	Van Schaick, Kathleen
Van See Veken, Hannah	Van Sickle, Leigh	Van Son, Mary	Van Stedum, Bonnie	Van Sunder, Maria Isabel	Van Tassell, Robin
Van Twyver, Patricia	Van Velson, Nathan	Van Verre, JC	Van Voast, Jordan	Van Walsen, Barbara	Van West, Rein And Jan
Van Wijk, Melissa	Van Zandt, Carolyn	Van Zanen, Kathryn	Van Zant, S	Van Zee, Lee	Van Zile, Dorthy
Van, Maria	Van. Arsdale, Duncan	Vana, Cheryl	Vanabrahams, Ron	Vanacore, Eric	Vanantwerp, Mari
Vanbenschoten, Susan	Vance, Bonnie	Vance, Eric	Vance, Patricia	Vance, Samuel L.	Vandam, Charlotte
Vandegriff, Bobbie	Vandegrift, Christena	Vandegrift, Julia	Vandenberg, Allison	Vandenberg, Clarence	Vandenberg, James
Vandenburgh, Jeffrey	Vandenbush, Shannon	Vander Poel, James	Vandergriff, Cynthia	Vandergrift, Julie	Vanderhill, Margo
Vanderhoof, Chris	Vanderhoof, Donna	Vanderkamp, Robert	Vanderkay, Judith	Vanderven, Thea	Vanderweele, Alex
Vanderzee, Susan	Vanderzeeglidden, Kate	Vandever, M. Joyce	Vandever, Pastor Larry	Vandinter, Rachel	Vandiver, Dwayne
Vandiver, John	Vandivere, Stephen	Vandrovec, Bryan	Vandrovec, Cathy	Vandruff, Judith	Vandyke, Charlotte
Vanek, Ashley	Vanek, Robon	Vanellis Jr, John B	Vang, Christy	Vang, Jenepher	Vangarderen, Megan
Vangorder, Gail	Vanhorne, Kristin	Vanlandingham, Mike	Vanmeter, Susan	Vann, Nancy	Vann, Teri
Vannostrand, Montie	Vanpelt, S	Vans, Kim	Vanwinkle, Jean Marie	Vanzant, Michael	Varas, Carlos
Varcasia, Chris	Varcoe, Donna D	Varela, Angela	Varela, Patricia	Varese, Vivian	Varga, Anne
Varga, John	Vargas, Aymara	Vargas, Carlos	Vargas, Consuelo	Vargas, Maria	Vargas, Marian
Vargason, Tanya	Varjavand, Nahid	Varner-munt, Sheri	Varni, Matthew	Varnum, David	Vars, Peter

Vasiliki, Georgikopoulou	Vasquez De, Katty	Vasquez, Andrea	Vasquez, Hector	Vasquez, Julia	Vass, Daniel
Vassard, C.	Vassen, Bruce	Vassier, Jean	Vassil, Crystal	Vassiliou, Alexia	Vath, Deborah
Vatousiou, Mark	Vaudiau, Jeanne	Vaughan, Carolyn	Vaughan, David	Vaughan, Deborah	Vaughan, Lisa
Vaughan, Lisa	Vaughn, Debra	Vaughn, Jeffrey	Vaughn, Megan	Vaughn, Theresa	Vaughn-dotta, Randy
Vaughter, Ellie	Vaupel, Ilona	Vawter, Rose	Vayda, Pilar	Vayo, Scott	Vaz, Mary
Vazquez, America	Vazquez, Cristina	Vazquez, Marcelo	Vazquez, Victor	Vazzano, Susan	Veach, Deb
Vee, Ordell	Vee, Paul	Veek, Marie	Veek, Reuben	Veelenturf, Callie	Veenstra, David
Veiby, Gail	Veillette, Elizabeth	Veits, Peter	Vela, Amanda	Vela, Danielle	Velarde, Mario
Velasco, Ana Maria	Velazquez, Migdalia	Vele, Brigid	Velez, Carolyn	Velez, Damian	Velez, Dawn
Velez, Erin Alden	Velez, Francisco J.	Velez, Kassandra	Velez, Sue	Velez, Theresa	Vella, Milo
Veloce, June	Veloo, Uma	Velvick, Joan	Vena, Skip	Venable, Brian	Vendel, Joseph
Venegas, Andres	Veneklasen, Julie	Veneziale, Deborah	Vengco, Aletha Ocean-forest And Ron	Venneman, Joetta	Vennett, Sean
Venos, Mary Helen	Vent, Mahina	Venter, Susan	Ventura, Augusto	Venturelli, Ava	Vera, Gabriel
Veraghen, Catherine	Veraldi, Anne	Verbiar, Beth	Verde, Kimberly	Verdelottijackson, Sharon	Verduyn, Sebastian
Vergara, Don	Vergin, Ute	Vergon, Pamela	Verhagen, Marc	Verhagen, Marianne	Verkamp, Doris
Verkerke, Inge	Vermeer, Shellie	Vermeulen, Martha	Vermillion, John	Verna, Diane	Vernon, Margaret
Vernon, Russell	Vernon-jones, Amy	Veronelli, Robert	Verrell, Paul	Verrill, Evelyn	Verschoor, Steven
Vertrees, Ann	Vertrees, Susan	Verwiel, Maureen	Verzola, Alessandro	Verzosa, Paul	Vescio, Pat
Vesey, Robin	Vesper, Paul	Vesque, Gunda	Vessell, Ramona	Vessicchio, Anthony P.	Vessicchio, Susan P.
Vest, Martha	Vestal, Leroy	Vetek, Suzanne	Vetter, Adrian	Vetter, Steve	Veyhl, Stanley
Vezendan, Bridget	Vezian, Marc	Via, Beth	Via, E. Jane	Viacrucis, John	Viadero, Emily
Viala, Veronique	Viator, Homer	Vice, Sharrel	Vicente, Sabrina	Vichiola, Christopher	Vick, Jennifer
Vickers, Jill	Vickers, Margaret	Vickers, Ruth	Victor, Jacqueline	Victoria, Celeste	Vidal, Francine
Vidaure, Georgia	Videen, Pam	Vidrine, Stephani	Viergutz, Julie	Viers, Patty	Vieth, Angela
Vieth, Richard	Vieth, Ronja	Vigen, Aana	Vigh, Joanie	Vigil, Matthew	Vigil, Trisha
Vigliotti, Bob	Vigna, Lauren	Vigneaud, Joy	Vignere, Joel	Viktorchik, Sheila	Vilas, Michel
Vilbrandt, Jody	Vilches, Paul	Vilimek, Linda	Viljoen, Christina	Villamizar, Herman	Villani, Nikolaos
Villano, Stephen	Villanova, Carolyn	Villanyi, Sara	Villar, Michelle	Villarreal, Noe	Villarroel, Erick
Villasenor, Stephanie	Villaume, Mary	Villavicencio, Dennis	Villegas, Noemi	Villeneuve, Michele	Villet, Barbara
Villi, Margaret	Villodas, Abigail	Vinagre, Shayne	Vince, James	Vincent, Amy	Vincent, Georgia
Vincent, J.C.	Vincent, Karen	Vincent, Kitty	Vincent, Louis	Vincent, Peter	Vincent, Renee
Vincent, Yadira	Vincent-cowan, Paula	Vincett, Tom	Vinecourt, Jean Marie	Vineski, Patricia	Vinett, William
Viney, James	Vinograd, Arlene	Vinokur, Jason	Violante, Michael	Viozzi, Anthony	Virgilio, Karen
Virgona, Terry	Virtanen, Kimmo	Visceglia, Constance	Viscount, Catherine	Viscuso, Michelle	Visger, Michael
Vishny, Dan	Vislisel, Mishelle	Vita, Deborah	Vitagliano, Cynthia	Vitale, Barbara	Vitale, Elizabeth
Vitale, Lisa	Vitela, Shirley	Viteri, Paola	Vitko, Cynthia	Vitola, Debra	Vittorini, Theresa
Vivencio, Janet	Vlach, Jeff	Vlasopolos, Anca	Vleugels, Dennis	Vliet, Brandon	Vo, Katherine
Voelker, Thomas	Voeltner, Carole	Vogel, JW	Vogel, Keith	Vogel, Marion	Vogel, Mary
Vogel, Nathan	Vogel, Steven	Vogel, Wolfhard	Vogler, Robin	Vogt, Chrysanne	Vogt, Elizabeth
Vohwinkle, William	Voice, Doris	Voigtschild, Susan	Voinotbaron, Margretta	Voisard, Sheryl	Voitko, Jon
Vojtisek, John	Voland, V	Voldal, Erik	Volgamore, Katrina	Volinsky, Freddy	Volk, Susan
Vollmer, Howard	Vollmer, James	Volmer, Alex	Volpatti, Dan	Volpe, Joseph	Voltz, Noreen
Von Abele, Melitta	Von Borstel, Bruce	Von Briesen, Rachel	Von Der Gathen, Martha	Von Foerster, Eric	Von Himmel, Anita
Von Hoffmann, Ronald	Von Huben, William	Von Moritz, Ramona	Von Pichl, Mercedes	Von Pierce, Jo	Von Roedern, Sue
Von Sponeck, Nelda	Von Tilinglewin, Maria	Von Tish, Lisa	Von Voigtlander, Philip	Von Zangenberg, William	Vonbenken, Barbara
Vonn, S.	Vonreubendale, Kathryn	Vonthronsohnhaus, Christine	Vonwettberg, Eric	Voorhees, Dolores	Voorhees, Virginia
Voorhies, Eric	Vopicka, Ellen	Vora, Ruchir	Vore, Susan	Vorhies, Paul	Vornbrock, Betty
Vorse, Stephanie	Vos, Walter	Voss, Stephanie	Vossoughi, Siamak	Voth Iii, Theodore	Voth Jr, Ted
Vought, Kimberley	Vouroscallahan, Pamela	Voves, Deborah	Voyles, Joyce	Voyles, Tamara	Vrancart, Charlotte
Vroom, Patricia	Vu, Tung	Vuillemot, William	Vuong, Amy	Vutukuri, Siva	Vuyas, Victor
Vyatchanin, Arkady	Vyatchanin, Evgenia	W, A	W, B	W, Dan	W, Dennis

W, J	W, Jand	W, Rosemary	W, Savannah	W., Anne	Waak, Brian
Wachholz, Jan	Wachob, Carrie	Wachs, Karen	Wachtel, Fern	Wachter, Marc	Wachtler Ciccia, Durrell
Wack, Julie	Wacker, Heidi	Wada, Wesley	Waddell, Kendra	Wade, Cory	Wade, Dan
Wade, Ellen	Wade, Frances	Wade, Julia	Wade, Julie	Wade, Pat	Wadford, Sonny
Wadkins, Sharon	Wadleigh, Michael	Wadsworth, Andrew	Wadsworth, Ralph & Molly	Wagenhauser, James	Wagenknecht, John
Wager, Linda	Wager, Ray	Waggle, Terry	Wagner, Ashley	Wagner, Carl	Wagner, Chris
Wagner, Christa	Wagner, D	Wagner, Donna J.	Wagner, Eleanor	Wagner, Herman	Wagner, Jonathan
Wagner, Laurel	Wagner, Robin	Wagner, Ryan	Wagner, Sally	Wagner, Sandra	Wagner, Stephanie
Wagner, Vickie	Wagnermcpherson, Caryn	Wagnon, Mana-jean	Wahl, Susan	Wahl, Thomas	Wahlberg, Sheila
Wahlers, Judy	Wahlstrom, Alexandra	Wahr, Bernhard	Wahrman, Mathew	Waidelich, Jalquin	Wailes, Becky
Waine, Linda	Waine, Rita	Wainwright, Donna	Wainwright, Natalie	Waiolena, Pamela	Wait, Cheryl
Waite, Marj	Waitz, Ronald	Wakefield, Christi	Wakefield, John	Wakeland, Jennifer	Wakely, Sam
Wakeman, Mary	Waksman, Barbara	Wakula, Wendy	Walach, Gabriela	Walby, Jackie	Walch, Birgit
Walcott, Donna	Wald, Aloysius	Wald, Amy	Walden, J	Walden, Mark	Walden, Tammarra
Waldenforrest, Karyn	Waldman, Annamay	Waldman, D. P.	Waldo, Richard	Waldoch, Mark	Waldrip, Steven
Waldron, Jennifer	Waldron, Linda	Waldron, Ralph	Waldschmidt, Susan	Waldspurger, Theresa	Wale, David
Wales, Tim	Waleski, Melanie	Walk, Simone	Walker Iii, Robert S	Walker, -	Walker, Andrea
Walker, Brad	Walker, Brian	Walker, Carol	Walker, Carol	Walker, Carolyn	Walker, Catherine
Walker, Cindy	Walker, David	Walker, Deirdre	Walker, Dorothy	Walker, Fern	Walker, George
Walker, Gloria	Walker, Heather	Walker, Heather	Walker, Janet	Walker, Jason	Walker, Jennifer
Walker, Jessica	Walker, Joan	Walker, John	Walker, John	Walker, Judith	Walker, Kathleen
Walker, Kimberly	Walker, Latonya	Walker, Lawrence	Walker, Leigh	Walker, Lynn	Walker, Lynn
Walker, Margaret	Walker, Maria	Walker, Mary Pat	Walker, Micheal	Walker, R.	Walker, Sandra
Walker, Sean	Walker, Sharlene	Walker, Stephanie	Walker, Sue	Walker, Sylvester	Walker, Tara
Walker, Todd	Walker, William	Walkiw, Irene	Walkowski, Mark	Wall, Alan	Wall, Beverly
Wall, Courtney	Wall, Deborah	Wall, Kathy	Wall, Nancy	Wall, SJ	Wall, Teresa
Wall, Thomas	Walla, C	Wallace, Ann	Wallace, Brenda	Wallace, Caroline	Wallace, Charles
Wallace, David	Wallace, Donald	Wallace, Faye	Wallace, James	Wallace, John	Wallace, Kerri
Wallace, Megan	Wallace, Nadine	Wallace, Stephen	Wallace, Thea	Wallace, Tina	Wallach, Lorna
Walleman, Mark	Wallen, Gregory	Waller, Ben	Waller, Don	Waller, Emory	Waller, Jeree
Waller, Kyle	Waller, Rhoda	Waller, Robert	Walling, Dr. Bob	Wallis, G	Wallman, Curtis
Wallof, Hunter	Walls, Dan	Walls, Fred	Walls, Janet E	Walls, Mary	Walls, Trina
Wallston, Kenneth	Walraven, Caitlin	Walsh, Allison	Walsh, David	Walsh, Deborah	Walsh, Denise
Walsh, Denyse	Walsh, Ellen	Walsh, Frances	Walsh, Gregory	Walsh, Jacqueline	Walsh, Julianne
Walsh, K	Walsh, Kelly	Walsh, Kevin	Walsh, Lina	Walsh, Linda	Walsh, Marce
Walsh, Margaret	Walsh, Margaret	Walsh, Miranda	Walsh, Nancy	Walsh, Patricia	Walsh, Stephen
Walsh, Susan	Waltasti, Marilyn A.	Walter, Alexandra	Walter, Beverly	Walter, Janet-jo	Walter, Kenneth
Walters Ph.d., Robyn	Walters, Ben	Walters, Bianca	Walters, Carol	Walters, Ernie	Walters, James
Walters, Jennifer	Walters, Karla	Walters, Kenny	Walters, Linda	Walters, Sandi	Walters, Sandra
Walters, Steve	Waltershausen, Margaret	Walther, Karlee	Waltman, Karen	Waltman, Martha	Waltner, Susan
Walton, Dorothy	Walton, James	Walton, James	Walton, Janet	Walton, John	Walton, Marcia
Walton, Mark	Walton, Tarla	Walturz, Crissi	Walz, Tyler	Wambach, Gerald	Wanak, Angela
Wandel, Todd	Wands, Judith	Wanenmacher, Erika	Wang, Li-hsia	Wang, Rueenfang	Wang, Teresa
Wann, Trish	Wanzer, Paula	Warburton, Elizabeth	Ward Bissell, R.	Ward Saltini, Susanna	Ward, Amy
Ward, Annette	Ward, Aurelie	Ward, Barbara	Ward, Barbara	Ward, Betty	Ward, Catherine
Ward, Constance A	Ward, David	Ward, David J.	Ward, Diane	Ward, Dona	Ward, Donna
Ward, Garland	Ward, Gretchen	Ward, Ii, Harold	Ward, James	Ward, Janet	Ward, Jen
Ward, Joanna	Ward, Jude	Ward, Kathleen	Ward, Kathy	Ward, Ken	Ward, L. Maeve
Ward, Lyn	Ward, Marvin J.	Ward, Ms. Stacey A	Ward, Nancy	Ward, Ralph	Ward, Richard
Ward, Robert	Ward, S.	Ward, Sherree	Ward, Terrence	Ward, Wayne	Ward, Whitney
Wardell, Kate	Wardell, Tom	Warden, Kayla	Wardlaw, Jessica	Wardle, Christopher	Ware, Christopher
Ware, Clifton	Ware, Tom	Warford, Nena	Wargo, Cindy	Wargo, Geoffrey J.	Wargo, Marilyn
Warhol, Rob	Warne, Kathy	Warneke, L. F. & Carole	Warner, Carolyn	Warner, Chezna	Warner, Elizabeth
Warner, Joe	Warner, Jonathan	Warner, Lindy	Warner, Nadine	Warner, Susie	Warner, Zoe

Warnerhuggins, Vicki	Warnock, Craig	Warren Pope, C.	Warren, Barbara	Warren, Brian	Warren, Carol
Warren, Deborah	Warren, Jan	Warren, Karen	Warren, Kay	Warren, Megan	Warren, Richard
Warren, Stephen	Warren, Tom	Warrenbrand, Sofie	Warrick, Julie	Warrilow, Joanne	Warshauer, David
Warshawski, Sharon	Wartinbee, Craig	Wasgatt, Ann	Wash, Peter	Washburn, Ryan	Washil, Mike
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Wasko, Christine	Wasko, Kathleen	Wasko, Larry	Wasmer, Natalya	Wassell, Rebecca	Wasser, Ellie
Wasser, Nancy	Wasserman, Andrea	Wasserman, David	Wasserman, Herbert	Wasserman, Linda	Wasserman, Virginia
Wasson, Lawrence	Waste, Kathleen	Wasung, Michalina	Watanabe, Kimiyo	Watanabe, Marjorie	Watanabe, T.
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Waters, Diana	Waters, Les	Waters, Melissa	Waters, Nan	Waters, Odin	Waterworth, Pamela
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Watkins, Jeanne	Watkins, Jim	Watkins, Kathryn	Watkins, Kevin	Watkins, Marilyn	Watkins, Robert
Watkins, Ronnie	Watkins, Stefanie	Watkins, Susan	Watkins, Traci	Watkinson, Tomeka	Watola, Danuta
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Watson, Brad	Watson, Brady	Watson, Bryan	Watson, Claire	Watson, Crystal	Watson, Donna
Watson, Elizabeth	Watson, Frances	Watson, Harold	Watson, Kathleen	Watson, Kelly	Watson, Kevin
Watson, Lisa	Watson, Lois	Watson, Michael	Watson, Nancy	Watson, Pamela	Watson, Paulina
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Wattenbarger, Don	Watters, Cheryl	Watters, Whitney	Watts, Martin	Watts, Rachel	Waugh, Saundra
Waverllly, Betty	Wawrytko, Sandra	Way, Elizabeth	Waygren, ED	Wayland, Barbara	Wayland, Sean
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Weaver, Heather	Weaver, James	Weaver, Judy	Weaver, Kathleen	Weaver, Krista	Weaver, Michael
Weaver, Michael	Weaver, Pamela	Weaver, Pat	Weaver, Robert	Weaver, Robert	Weaver, Sandra
Weaver, Tammy	Weaver, William	Webb Muhar, Jana Lynne	Webb, Cindy	Webb, Esther	Webb, Harold
Webb, Holly	Webb, James	Webb, Jo Ann	Webb, Joan	Webb, Joann	Webb, Kristin
Webb, Lauren	Webb, Lewis	Webb, Maureen	Webb, Michael	Webb, Michael	Webb, Sharon
Webber, Allison	Webber, Gary	Webber, Nancy	Webber, Warren	Weber M.d., Brenda	Weber, Bonnie
Weber, Dorothy	Weber, Glen	Weber, Loretta	Weber, Lori	Weber, Marc	Weber, Nicole
Weber, Priscilla	Weber, Rose	Weber, Zorina	Webster, Bernadette	Webster, Cassandra	Webster, Ellen
Webster, Jamie	Webster, Mary Anne	Webster, Rosemary	Wechselblatt, Marylin	Wechsler, Edward	Wecker, Judith
Wecker, Stanley	Wecker, Tamara	Weddle, Rick	Wedell, Mark	Wedgeworth, Jeanette	Weeber, Mary
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Wegener, Bruce	Wegweiser, Arthur	Wehberg, Shelley	Wehner, Michaela	Wehr, Laura	Wehrle, Douglas
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Weil, Janet	Weil, Susanne	Weilage, Nan	Weiland, Janice	Weimer, Marcia	Weimer, Margaret
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Weinstein, Sonjia	Weinstock, David Arthur	Weinstock, Stuart	Weinzveg, Barry	Weir, David	Weir, Louise
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Weisend, Jeff	Weisenfeld, Harvey	Weishahn, Carolyn	Weisman, Eleanor	Weisman, Lammy	Weismantle, Donna
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Wells, Rachel	Wells, Robert	Wells, Sharon	Wells, Stefan	Wellsted, Bob	Welsh, Caitlin

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West, Diane	West, Elizabeth	West, Eric	West, Gary	West, Graden	West, Janice
West, Jeffrey	West, Jennifer	West, Lynda	West, Marla	West, Mary	West, Mary
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White, Chris	White, Denis	White, Denise	White, Edwina	White, Elizabeth	White, Eric
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White, Robbie	White, Robert	White, Ruth	White, Scott	White, Seema	White, Shelly
White, Stephan	White, Trina	White, Virginia	White, William P.	White, Yana	White, Yvonne
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Whitley, Shonna	Whitlock, Brenda	Whitlock, Gina	Whitlock, Graeme	Whitlow, Brigitte	Whitlow, Dessa
Whitman, Adam	Whitman, Dianne	Whitman, Fanny	Whitman, Fran	Whitman, Rick	Whitmire, Donna
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Whitten, Darice	Whitten, Richard	Whittier, James L.	Whittinghill, Susie	Whittle, Liberty	Whittler, Cynthia
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Wieland, Charles	Wieland, Leslie	Wieland, Martin	Wienbrock, Lorraine	Wiener, Linda	Wiener, Wendy
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Wiest, JO	Wiest, William	Wieting, A	Wigard, Jay	Wiggers, Stewart	Wiggin, Deborah
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Wilder, Florence	Wilder, George	Wilder, Sandy	Wildermann, Carl	Wildes, Diane	Wildman, Teena
Wile, Debra	Wilen, David	Wiles Iii, John	Wiley, David	Wiley, Frank	Wiley, Gerri
Wiley, Jennifer	Wiley, Joseph	Wiley, Kimberly	Wiley, Milissa	Wiley, Tracey	Wilfing, Janice
Wilger, Micah	Wilhelm, Lisa	Wilhelm, Regina	Wilk, Tara	Wilke, Carolyn	Wilke, Mike
Wilke, Stephen	Wilkerson, Brian	Wilkerson, Ryan	Wilkes, Dave	Wilkes, Donna	Wilkes, Elizabeth
Wilkin, Sue	Wilkins, Brandi	Wilkins, Jaci	Wilkins, Pat	Wilkins, Rebecca	Wilkins, Richard
Wilkinson, Arthur	Wilkinson, Brad	Wilkinson, Harold	Wilkinson, Lynn	Wilkinson, Maryann	Wilkinson, Quinta
Wilkinson, Rachel	Wilkinson, Sandra	Wilkinson, Wayne	Wilks, Andrew	Will, Leona	Willallen, Mary
Willard, Ann	Willecke, Dounia	Willems, Kriss	Willet, Zoe	Willets, Laurie	Willey Halpin, Wanda
Willhoft, Kerry	Willhour, James	Williams Arnp, Jana	Williams Schilling, Joy	Williams, AD	Williams, Adam
Williams, Alek	Williams, Andrea	Williams, Angie	Williams, Ariana	Williams, Brandon	Williams, Brent
Williams, Brigida	Williams, Carla	Williams, Carol	Williams, Caroline	Williams, Carrie	Williams, Catherine
Williams, Chelsi	Williams, Cheryl	Williams, Christine	Williams, Christine	Williams, Christopher	Williams, Connie
Williams, Daemon	Williams, Dana	Williams, Daniel	Williams, Dasean	Williams, Deborah	Williams, Deborah
Williams, Deborah	Williams, Diane	Williams, Dolph	Williams, Donald	Williams, Donna	Williams, Donna
Williams, Ebony	Williams, Edie	Williams, George V.	Williams, Glenn	Williams, Glenn	Williams, Hannah
Williams, Heather	Williams, James	Williams, Jeaneane	Williams, Jeanette	Williams, Jesse	Williams, Jim And Alison
Williams, John	Williams, John	Williams, Josie	Williams, Judith	Williams, Karen	Williams, Kathleen
Williams, Kathleen	Williams, Kathleen	Williams, Kathleen	Williams, Lee	Williams, Lena	Williams, Leslie
Williams, Linda	Williams, Linda	Williams, Linda	Williams, Linda	Williams, Linda	Williams, Linda
Williams, Lori	Williams, Lory	Williams, Maggie	Williams, Mara	Williams, Marcia	Williams, Margery
Williams, Margot	Williams, Mary	Williams, Melissa	Williams, Michael	Williams, Mike	Williams, Monica
Williams, Myron	Williams, Naython	Williams, Nicholas	Williams, Norma	Williams, Norman	Williams, Olivia
Williams, Olivia	Williams, Pamela	Williams, Pat	Williams, Patricia H	Williams, Patricia M.	Williams, Patty
Williams, Paul	Williams, Paul	Williams, Rich	Williams, Ron	Williams, Roosevelt	Williams, S. E.
Williams, Sabine	Williams, Sandra	Williams, Sarah	Williams, Scott	Williams, Shannon	Williams, Taffy
Williams, Todd	Williams, Torry	Williams, Vicki	Williams, Wendy	Williamson, Barbara	Williamson, Beth
Williamson, Bruce	Williamson, Chris	Williamson, Debbie	Williamson, Debbie	Williamson, Deborah	Williamson, Gay
Williamson, Jacqueline	Williamson, Jim	Williamson, Marlo	Williamson, Martha	Williamson, Michelle	Williamson, Natalie
Williamson, Sherri	Williamson, Suzanne	Williamssammond, Sarah	Williard, Linda	Willing, Maura	Willing, Richard
Willinger, Carol	Willingham Demircan, Tracy	Willis, Donatella L	Willis, Edward	Willis, Karen	Willis, Luke
Willis, Matt	Willis, Megan	Willis, Nancy	Willis, Peggy	Willis, William	Willitts, Terrence
Willix, Carmen	Willner, Daniel	Willner, Dina	Willner, Jon	Wills, Annemarie	Wills, Jack
Wills, Kyle	Wills, Susan	Wills, Tiffany	Willson, Helene	Willson, Jon Michael	Wilm, ML
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Wilson, Arlene	Wilson, Bill	Wilson, Carole	Wilson, Christina	Wilson, Christopher	Wilson, Constance
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Wilson, Don	Wilson, Holly	Wilson, Jacob	Wilson, James & Shirley	Wilson, Jane	Wilson, Jerry
Wilson, Joan	Wilson, John	Wilson, Judith	Wilson, Karen	Wilson, Kathryn	Wilson, Kristi
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Wilson, Matthew	Wilson, Mitch	Wilson, Molly	Wilson, Peter	Wilson, Richard	Wilson, Rick
Wilson, Robert	Wilson, Robin	Wilson, Rose Marie	Wilson, Sara	Wilson, Sarah	Wilson, Shelby
Wilson, Sue	Wilson, Susan	Wilson, Terri	Wilson, Thomas	Wilson, Tim	Wilson, Tim
Wilson, Todd	Wilson, Tonia	Wilson, Wendy	Wilton, Liz	Wilts, Sara	Wiltsie, Don
Wimberly, Blaine	Winbigler, Houston	Wince, Elizabeth	Winchester, Kyndle	Wind, Rosalie	Windberg, Thomas
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Winsberg, Julie	Winship, Ann	Winslow, Lee	Winslow, Tyler	Winstanley, Jess	Winstead, Annie
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Winterkorn, Matt	Winters, Jo Ellen	Winters, Joanne	Winters, Lisa	Winters, William	Wintersberger, Sanford
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Wise, Carol	Wise, Charles	Wise, David	Wise, David	Wise, Marai	Wise, Margaret
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Witte, Mark	Wittenbrader, Jill	Wittern, Dennis	Witting, Peter	Wittlinger, Jennifer	Wittmann, Stella
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Wolf, Donald	Wolf, Grant	Wolf, James	Wolf, Janette	Wolf, Jivan	Wolf, Joe
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Wolff, Ari	Wolff, Barbara	Wolff, Kathy	Wolfgang, Mara	Wolfgang, Sandra	Wolf-lyerla, Maryann
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Wood, Ernest	Wood, Hannah	Wood, Joanne	Wood, Joyce	Wood, Judy	Wood, Julie
Wood, Karen	Wood, Kathy	Wood, Katie	Wood, Margaret	Wood, Martha	Wood, Richard
Wood, Rick	Wood, Roberta Godin	Wood, Rose	Wood, Ruby	Wood, Shelva	Wood, Sherard
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Yee, Anthony	Yee, Dennis	Yee, Lorraine	Yee, Theresa	Yefsky, Sonja	Yeh, John
Yellin, Shane	Yellis, Stefanie	Yen, Jeannette	Yenney, Judith	Yennior, Todd	Yeomans, Kathy
Yepes, Oscar	Yerardi, Marie	Yerden, Carol	Yerena Jr, Julian	Yetter, Barbara	Yeung, Alexander
Yi, Teresa	Yilmaz, Heather	Yll, Judy	Yocum, Amie	Yohalem, Louise	Yokubison, Ron
Yonker, Ashley	Yonnetti, Eben	Yoonas, Asma	Yopp, Mary	Yore, Sharron	Yorgason, Laurence
York, Red Lion	Yoshinaga, Hiromi	Yoskowitz, Ken	Yoss, Jessica	Yost, Viviana	You, Sam
Young, Alaska	Young, Amanda	Young, Anne	Young, Annette	Young, Carl	Young, Carolyn
Young, Carvonda	Young, Cathy	Young, Cheryl	Young, David	Young, Debra	Young, Diane
Young, Doug	Young, Dr Lih	Young, Fran	Young, Gail Eva	Young, Gordon	Young, Howard
Young, Ivy	Young, Jean	Young, Jean	Young, Jennifer	Young, Joel	Young, John
Young, John	Young, John	Young, Jonathan	Young, Kathleen	Young, Kathy	Young, Katie
Young, Kevin	Young, Mary	Young, Mary	Young, Miranda Allison	Young, Nancy	Young, Nancy
Young, Phil	Young, Philip	Young, Rae	Young, Roberta	Young, Ron	Young, Sandra
Young, Shelley	Young, Stan	Youngblood, Linda	Youngclaus, Elisabeth	Youngling, Jeannette	Youngs, Alex
Yount, Lyn	Yount, Nancy	Yow, Linda	Yrastorza, Teresa	Yribar, Rita	Yttri, Russell
Yudkovsky, Natalya	Yuen, Andrew	Yuen, Stephen	Yuen, Timothy	Yuen, Yip	Yukl, Trudy
Yun, Allen	Yunker, Mary	Yurchuck, Ruth	Yurman, Richard	Z, A	Z, Alexis
Z, Eleslie	Zaar, Caryl	Zaber, Pamela	Zaborowski, Natalie	Zaccagnino, David	Zacharis, Alison
Zachlod, Michelle	Zachman, Omega	Zachowstover, Amanda	Zack, Marilyn	Zack, Mary	Zackrone, Alex
Zadmehran, Srira	Zafren, Ken	Zagoren, Beth	Zahler, Mary Lynne	Zahller, Guy	Zahos, Jonathan
Zahra, Raymond	Zahrt, David	Zaitlin, J.A.	Zajac, Andrea	Zakar, Barry	Zakosek, Tim
Zaldivar, Marjel	Zaller, Robert	Zalon, Susan	Zaltana, Flavia	Zaman, Samia	Zaman-zade, Rena
Zambon, Paolo	Zamboni, Jean	Zambout, Ashley	Zamora, Elvia	Zamora, Margie	Zamorski, Cindy
Zampese, Eleanor	Zamudio, A.	Zan, Paula	Zander, E Anna	Zanders, Marya	Zandonella, Liza
Zanettin, Regina	Zanetto, Jana	Zangara, Amanda	Zani, Joseph	Zanney, Shawna	Zanoni, Jan
Zapf, Roberta	Zaplatynski, Miecia	Zappa, Stephanie	Zarafshon, Andijan	Zaricor, Dorien	Zarkhosh, Helia
Zarnoch, Walter	Zarr, Debra	Zasadnyj, Walter	Zastrow/hendrickson, Lila/dave	Zatlukal, James	Zavala, Kathy
Zavarella, Rosalie	Zavattero, Cameron	Zaveduk, Victor	Zavilowicz, Alexandra	Zawadski, Rosemary	Zawadzki, Teddie
Zawaski, Joan	Zayac, Sharon	Zazula, Christina	Zbikowski, Angela	Zboya, Patrice	Zebker, David
Zebrowskibird, Marty	Zecchini, Veronica	Zechmeister, Gisela	Zecker, Donna	Zee, Vici	Zeeberg, Lucas
Zeh, Janet	Zelasko, Sandra	Zeledon, Homara	Zelenak, Gail	Zelinski, Dawn	Zeljo, Ali
Zellak, Lisa	Zeller, Evelyn	Zeller, Michael	Zeller, Rudy	Zeller, Winnie	Zellmer, Kevin
Zellner, Angie	Zellner, Scott	Zelt, Barbara	Zeman, John	Zendel, Sherry	Zenker, Paul
Zenner, Alan	Zentall, Sydney	Zentura, A.	Zepeda, Justin	Zepeda, Robin	Zeps, Dace
Zerbib, Sylvia	Zerger, Connie	Zerio, Erin	Zerr, Laura	Zetley, Herb	Zettel, Stephen
Zetting, Judith	Zevin, Dora	Zgoda, Julian	Ziama, Kristin	Zibordi, Barbara	Zide, A
Ziebarth, Lloyd	Ziegler, Cynthia	Ziegler, Dawn	Ziegler, Jacqueline	Ziegler, Robert	Ziegner, Diane
Zielinski, Betsy	Zielinski, Mary Ann	Zielinski, Rita	Ziemba, Jacqueline	Ziemba, Jason	Ziemnik, Christine

Ziems, Stacy	Ziencina, Terra	Zierikzee, R.	Ziesmer, Rosi	Zilbergeld, Leah	Zill, Kristina
Zima, Antonia	Zimmer, Sharyn	Zimmerhenning, Kaitlyn	Zimmerman, Jane	Zimmerman, Lauren	Zimmerman, Leda
Zimmerman, Linda	Zimmerman, Linda	Zimmerman, Pam	Zimmerman, Phyllis	Zimmerman, Randolph	Zimmerman, Robert
Zimmerman, Sephanie	Zimmerman, Taylor	Zimmermann, Adele	Zimmermann, ED	Zimmermann, Richard	Zimmermann, Susan
Zingher, Judith	Zink, Lydia	Zinn, Andrea	Zinn, Janice	Zinn, Robert	Zion, Alicia
Zipay, Joanne	Zirasri, Ran	Zitis, Charlotte	Zito, Marianne	Zlatin, Marina	Zlotek, Paul
Zmek, Jonathan	Zmitrovis, Lois	Znidar, Erin	Zoahhenderson, Richard	Zobel, Conrad	Zodhiates, Mary
Zody, Alicia	Zoeter, Mark	Zofkie, Marcia	Zoha Hawk, Carol	Zolandz, Mark	Zollars, Teresa
Zollinger, Hanna	Zondorgh, Honz	Zonenberg, Edward	Zook, Dr. Donna	Zornesky, Jerome	Zoro, Piero
Zosel, Federico	Zoupas, Robbin	Zrobek, Ann	Zsoldos, Donna	Zubalik, Susan	Zuber, Margaret
Zubko, James	Zucchino, Nancy	Zucker, Eva	Zucker, Jessica	Zucker, Marguery	Zuckerberg, Ronnie
Zuckerman, Arlene	Zuckerman, Barry	Zuckerman, Carol	Zuckerman, Michael	Zuckerman, Sandra	Zufelt, Danielle
Zukas, Wendy	Zukoski, Katie	Zulch, Ramona	Zuluaga, Nicole	Zumalt, David	Zumpe, Doris
Zumpf, Kristen	Zurakov, Michael	Zwepink Polstin, Rebecca	Zwirtz, Debbie	Zyla, Alison	Zylius, Patricia

FL7 Earth Ministry

Comment FL7-1

November 18, 2015

Westway and Imperium Terminal Services Expansion Project EISs

c/o ICF International

710 Second Street, Suite 550

Seattle, WA 98104

Dear Washington Department of Ecology and City of Hoquiam:

Religious leaders and people from faith communities throughout the Northwest are opposed to oil-by-rail projects and fossil fuel terminals that are built on unstable land in populated areas. The consequences of derailments and accidents can never be mitigated, and even the regular running of these 3 heavy, dirty oil trains is bad for Washington. Traffic delays, oil spills, air pollution, and leaks are part of doing business for oil trains and tanks. The Westway and Imperium oil terminal proposals are not good stewardship of our communities, land, water, and climate. We know we can do better.

The recent crude oil train derailments and oil spills across North America underscore the high level of danger that oil treansport brings to Northwest communities and waterways. These accidents impact people's lives, homes, schools, jobs, and drinking water, as seen with the deaths of 47 people in the tragic Lac-Mégantic, Quebed accident. Trains delivering oil to the Westway and Imperium proposed terminals would cross all of Washington State. Our communities – from Spokane to the Columbia Gorge, from Centralia to Hoquiam – cannot afford an oil spill or explosion.

The findings in the DEISs for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and the environmental damage would be significant.

There is simply too much risk and too little reward for these proposals: Grays Harbor communities would take on the risk and oil companies would reap the profits, while becoming a throughway for oil.

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Response to FL7-1

Refer to the Master Response for Purpose and Focus of the EIS.

Table 7-11. Unique Comments Associated with Earth Ministry Form Letter

Commenter Name	Comment
Allan, Inez	Please work to save the only Earth we have. Stop pollution.
Response: Comment acknowledged.	
Anderson, Glen	I'm a 67-year-old Christian who firmly believes that WE MUST BE GOOD STEWARDS of the beautiful world God created. Greed and contempt for God's creation have created the climate crisis. Environments and people are already suffering, and climate science proves that more destruction and suffering are already baked into our atmosphere for further suffering. IN THE NAME OF GOD, STOP THE ABUSE! STOP further extraction and burning of coal and oil. RAPIDLY TRANSITION to renewable energy. RAPIDLY CONVERT to a different kind of economy -- one that will be truly sustainable. EACH PERSON IS RESPONSIBLE FOR WHAT WE DO -- AND FOR WHAT WE FAIL TO DO!
Response: Comment acknowledged.	
Ayala, Marlene	We are stewards of the earth which includes all living species, the land and water and air. Anything we do to harm these gifts is a crime against divinity. The constant pollution of the earth is a horrific evil. We can do things better and we should.
Response: Comment acknowledged.	
Bader-Nesse, Marilyn	We must protect all humans and wildlife species. For too long the oil companies wait for something to happen then put bandages on the problem. The expectation that the tax payer will eventually pay for the mess-one way or the other. The trains carry more than on type of product; there have been well over 10 different placards on trains with different chemical numbers on them. These are the trains that run through towns and along our water ways. This should be no question as to what we need to do.
Response: Comment acknowledged.	
Baker-Smith, Gerrit and Elizabeth	The earth is the Lord's.....for our stewardship, not our exploitation. We have alternatives to fossil fuels.....it's beyond time to focus on and invest in them!
Response: Comment acknowledged.	
Banks, Julie	As a person of faith, I truly believe that humans are an integral part of creation endowed with the capacity to act responsibly. Responsible stewardship is critical not only for our own ongoing well-being as a species, but for all of life. When we behave recklessly, with motives that are short-sighted and driven only by greed, all of life pays the ultimate price. Acting in faith requires us to balance the needs of life today and in the future against those of immediate profit. There can be no other justification before our Creator!
Response: Comment acknowledged.	
Barr, Nancy	We are required to be stewards of the Earth and that includes protecting habitat and wildlife.

Commenter Name	Comment
Response: Comment acknowledged.	
Bassett, Beverly	It is immoral to allow the destruction of our waters, lands and air through the inevitable degradation that crude oil transport, oil terminals and sea-going barges will surely bring to the lands that will stop supporting our lives and the lives of our children. IMMORAL.
Response: Comment acknowledged.	
Belshaw, Mary	As a citizen of the world I know that when oil is taken from the earth and moved by any means and then burned, there are no boundaries from the repercussions of accidents. Accidents are waiting to happen, no matter how many precautions are taken. We are all at risk from taking the oil from the earth, moving it, and burning the fuel. People, animals on land and sea, all of nature is at risk. PLEASE STOP THIS INSANITY!
Response: Comment acknowledged.	
Bergholz, Jean	I have seen what coal dust does to cities and plants etc, it kills just like it does to people that inhale it. It gets in their lungs and eventually takes their life like it did for my father-in-law at the age of 32, leaving a family of 6 behind. Why do they not have to be responsible for their accidents, why do they cities and the people have to clean up after them. Shell Oil was responsible for their clean up why not them, they rake in billions of dollars and pay nothing but want everything. After they build they will leave their mess to destroy plantation around them as well as the fishing industry. They came in and destroyed our wetlands before they had the permits, why should we believe what they say now and do behind our backs.
Response: Comment acknowledged.	
Betz-Zall, Jonathan	The unfairness of oil company profits at the community's cost violates our testimonies on simplicity, peace, equality and especially integrity.
Response: Comment acknowledged.	
Black, Rachael	God made us Stewards of His Creation.
Response: Comment acknowledged.	
Blakemoe, Rosemary	We must protect and preserve this beautiful earth we have been entrusted with, and to save it for future generations.
Response: Comment acknowledged.	
Bosh, Joni	We are called to be stewards, not destroyers, of creation. What drives these projects is money, not care for the welfare of others.
Response: Comment acknowledged.	
Botch, Margaret	As a person of faith and a Catholic I want to implement the principles in Laudato Si (On Care for Our Common Home), the recent encyclical of Pope Francis.
Response: Comment acknowledged.	
Bougher, Thomas	We have been blessed with a habitat friendly to human life. In view of our history, it is not difficult to accept the concept of evil, as well as the undoubted presence of a power in the universe greater than ourselves. Our ability to reason, and choose our own destiny is unique, and should not be squandered. It makes perfect sense for us to be responsible stewards of that which we have been given.
Response: Comment acknowledged.	
Bowman, Elsa	I feel the biblical responsibility we are share to be good stewards of the Garden our Creator has so generously given us. This means to keep it as clean and close to its natural form as possible.
Response: Comment acknowledged.	
Boyden, April	I long to walk with all my brothers and sisters in peace and count the earth among my family.
Response: Comment acknowledged.	
Brevig, Lynn	We have polluted Mother Earth far too long as a human species. Tomorrow may be too late for any reversal of the damage we have done and continue to do. We want no part of further damage to the environment. Any possible threat to clean air, water and land is an assault on all species of the planet.

Commenter Name	Comment
	We are all sick at heart if we have any awareness at all of the preciousness of protecting all of the eco-system. Some of us are awake and aware and have spent our lifetimes working toward a cleaner and more caring approach to using this God-given environment. Tomorrow is too late for awareness!
Response: Comment acknowledged.	
Brown, Rev. Mary Karen	Grays Harbor communities would take on all the risks, which could not be mitigated, of a possible oil spoil. I would prefer leaving fossil fuels in the ground, as much as possible, while having our nation emphasize, instead, an immediate commitment to developing renewable energies, much the same as the nation undertook a commitment to developing an atomic bomb in WWII. However, this would be a much more positive national commitment, which would benefit the entire world, and would be a good example for other nations. Such a commitment would also create many jobs inside our country.
Response: Comment acknowledged.	
Cacciari, Ann	No dirty , non-sustainable fuel sources should be continuously sought after and developed---especially near major bodies of water and tsunami prone areas. It is a disaster waiting to happen!!! I am 100% against any such project.
Response: Comment acknowledged.	
Campbell, Connie	It seems to me that from the beginning of time on earth God told us we are to be stewards of the earth. I view getting involved and expressing opinions about events that impact the environment in a negative way is one way I can be a steward of the earth.
Response: Comment acknowledged.	
Carr, Mary	To take care of the earth and its people is what is called for in the Gospels.
Response: Comment acknowledged.	
Cochrane, Julia	I believe I the interdependent web of life. I know that when you damage one part. The damage spreads and will eventually damage us and all living things. Please stop.
Response: Comment acknowledged.	
Colangelo, Annapoorne	I care because my faith tells me that there is no difference in all that exists and we are to care for all, no matter what it is.
Response: Comment acknowledged.	
Corbett, Todd	We are all stewards of the earth. When this gift we call Earth, our home, is being desecrated and without concern for anything except profit, this is a cause for action. We need to act to save our home. This is so obvious if we don't have dollar signs in our eyes.
Response: Comment acknowledged.	
Cornwell, Rev. Marilyn	Continued and increased oil transport is a danger to our communities and our waterways. Contributing to desecration of our planet through further fossil fuel transport and export is a sin against God, our fellow human beings and fellow creatures.
Response: Comment acknowledged.	
Corum, Edythe	I believe God intended us to be stewards of his creation, not abusers.
Response: Comment acknowledged.	
Covert-Bowlds, Chris	We are called to be responsible stewards of the Earth. This proposal is not responsible. It is too risky.
Response: Comment acknowledged.	
Cruz, Deborah J.	Besides the above reasons, there is also the fact that the Quinault and other Native communities throughout the NW are opposed to these kinds of projects as they will have devastating impacts on sacred lands and waters and on their treaty rights. These take precedence over projects that have extremely detrimental impacts to the NW coastal environment and which will only benefit a handful of corporate types over the long run. There's too much at risk. Let's focus our time, energy and resources on projects and energy sources that won't wreak havoc on our land, air, water and Native neighbors' rights and sacred spaces (which should be our sacred spaces, too). No mitigation. No new terminals or expansion projects on existing terminals.

Commenter Name	Comment
Response: Comment acknowledged.	
Cummings, Judy	Please curtail shipping oil through this area by rail and allowing for a fossil fuel terminal at Gray's Harbor proposed by Westway and Imperium A single major oil spill could devastate the county's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters. There needs to be a far more detailed analysis of costs, evacuation plans, insurance coverage, fisheries impacts, and losses to shorebird habitat and tourism potential in the event of an accidents. We do not want to lose this area which is rich in natural resources and wildlife. It could turn out to be another BP or Exxon Valdez - both of which are unacceptable. Additionally, you are stepping on the rights or the tribal people in this area and the rich culture and vibrant economy that this area represents to them.
Response: Comment acknowledged.	
Dahlstrom, Lola Elizabeth	We must be good stewards of our land and water because our faith teaches us to care for all of creation. This beautiful tidal inlet is very fragile and still shows the scars of man's past abuse of its waterway. The first peoples cared for the environment and respected all life forms with a sustainable use of resources. The water, land and all creatures do not belong to industry to trash or to an individual or an entity for their personal gain. They belong to all generations and must be preserved. Pope Francis has called for peoples of all faiths to stop our abuse of the land and water and blames our consumerist society for allowing us to ruin our world. Please do not allow this project to put in jeopardy our state's progressive environmental focus moving toward cleaner water. Oil transport and storage is dirty business, even if there were no further risk of spills. Why should we take any risk of putting oil near the life source for so many ecosystems?
Response: Comment acknowledged.	
Daletski, Anne	There are many reasons for me to care about these projects. These are a few of them: We must not disregard the Quinault Nation's treaty rights. We must not ignore ongoing threat of oil spills in our waterways. It is time to use alternative fuel. We must not tolerate traffic tie-ups blocking emergency response vehicles. We must not incur huge financial costs because business always seems to have Insufficient insurance to cover costs of an accident. We must not allow the dangers of storing crude oil in a tsunami zone. We must not cause expense to local businesses. We must not encourage loss of pristine habitat for shorebirds and other creatures. We must not risk of oil train derailments and explosions. We must not impact communities along the entire rail line. Faith tells us that we are called to be good stewards of our communities, our land and our water. There is a value to life and the earth that has nothing to do with money. Do your part to save the earth before it is too late.
Response: Comment acknowledged.	
Davies, Valerie	We must do a better job of protecting our environment. It is simply the moral thing to do - for now and for our children, grandchildren and all future generations. How can we let greed trump our concern for the future?
Response: Comment acknowledged.	
DeGooyer, Elise	As a lifelong Washington resident, I care about the people and natural areas of our state. The people, birds, and waterways of Grays Harbor deserve better. As a lifelong catholic, I know we are called to protect our environment and the common good.
Response: Comment acknowledged.	
Douglas, Virginia	I was in the Grays Harbor area in September. My tourist dollars for next year may be at stake here. Let's commit to keeping our country beautiful and healthy.
Response: Comment acknowledged.	
Durnan, J. Richard	The place is here, the time is now to begin cleaning up our planet!
Response: Comment acknowledged.	

Commenter Name	Comment
Elkins, Anne	I believe that it is our duty to take care of this beautiful home we have been given. We are obligated to preserve it for future generations. Selfish greed must not be allowed to destroy our home.
Response: Comment acknowledged.	
Ellis, Liz	Life and the quality of life must come before profit. CO2 levels are on an exponential rise and climate change is putting added stress on plants, animals, and humans already compromised by toxins in our food, water, and air. Our generation must stand for ending the dependence on oil and other fossil fuels for the sake of all people and as stewards of this miraculous planet.
Response: Comment acknowledged.	
Ervin, Keith	I am concerned about the physical safety of those who live along the rail lines and in the terminal areas, and about the impacts of potential oil spills on an environmentally sensitive coastal area. But above all, these projects should be rejected because they would lead to acceleration burning of fossil fuels at a time when it is imperative that the release of greenhouse gases be slashed in order to avoid catastrophic, global climate change.
Response: Refer to Draft EIS Section 4.7, *Impacts on Resources,* for descriptions of potential impacts that could result from the proposed action.	
Farness, Janet	The time is now to say yes to the future and no to the past. To take on the role as steward of God's creation, not dismantler of it.
Response: Comment acknowledged.	
Felnagle, Debby Mumm	Please recognize that we will all be affected by the tragedy of an accident that can come from the transporting of oil and our continued use of fossil fuels. Even though an event might not take place directly in my back yard, the ripple effect of a mishap can be felt across the miles. I urge you to take the consequences of a possible mishap seriously and be conservative and cautious in allowing oil transport. Let's keep it in the ground!
Response: Comment acknowledged.	
Fine, Kelly	I want all our children to inherit the lush world that we were born into.
Response: Comment acknowledged.	
Follett, Thelma	All of the people of the planet (including the greedy global energy and arms manufacturing corporatocray) MUST begin to be responsible for the climate and for the day to day personal safety of every individual on the planet. We especially must be mindful of the day to day safety of the children and of their future on this sacred earth. What do we want to leave for them and for their children when we are gone. Practice reverence for life, it is the most worthwhile thing you can do while you sojourn here.
Response: Comment acknowledged.	
Ford III, Robert	If you are a person of faith you recognize God as wanting his followers to protect the earth and ALL it's inhabitants. HIS guidance would not condone what is so blithely proposed by the Railroad and Oil and financial forces. HE would want us to do what is RIGHT!!!
Response: Comment acknowledged.	
George, Judith	We are all called to care for the earth, our common home. This includes the environment, land, air, water, wildlife, human life. Our care for one another and for future generations beg that rail transportation of oil be restricted, then discontinued.
Response: Comment acknowledged.	
Goethe, Teresa	The proposed oil holding facilities would compromise safety for the people of Grays Harbor as well as the maritime environment which is home to many fish, birds and shoreline animals. Please look closely at the findings of the DEIS and reject the oil shipping terminals.
Response: Comment acknowledged.	
Goodwin, Amanda	My attention has been drawn to environmental preservation with increasing intensity over the past twenty-five years. This attention has been shaping my actions, my choices, my words, my prayers. My heart and purpose have been coming more and more in line and in solidarity with indigenous peoples all over the world and especially with those who shaped and continue to shape this region. It is important to me that my city, my county, my state and my country keep their promises and

Commenter Name	Comment
	treaties to the indigenous peoples because these promises are made in my name and in the name of all of us in the community. I stand by these promises. I uphold them. I see clearly the danger of the oil trains, the recklessness of continuing them when they should have been discontinued after the first accident. I want our community to decisively put an end to oil trains. After the fires of this last summer in Washington state that affected us all from loss of life to loss of property to loss of health through poor air quality, we all need to make choices that will increase the resistance to fires in our forests and decrease the actions that put the forest at risk of fire. I cite fire only as one example, but I am thinking also of the salmon, the delicate marine ecosystem of the Puget Sound, the waterways of the Northwest that must be protected from pollution. An oil spill in any of our waterways must not happen. Oil trains in the Pacific Northwest must be halted entirely, and we start by not creating more terminals. There must be no validation; we must decisively halt this transport of oil by rail through our region. Through our firmness and resolution to stop what we do not want, alternative paths to what we do want will open to us. As a person of faith, I have faith that nature is God's creation, and that as Human Beings we are its caretakers.
Response: Comment acknowledged.	
Gribble, Judy	It is a sacred trust to accept the obligation to care for our Earth. If we don't we consider this the 6th extinction ... The only one created by humans.
Response: Comment acknowledged.	
Guss, Elizabeth	We are called on to care for the earth, to exercise prudence in how we use the earth's goods, and to ensure that the planet is healthy and productive for future generations. Both our excessive dependence on fossil fuels and the great distances to transport them are inconsistent with 21st century best practices to care for the earth, show prudence, and ensure a healthy future. PLEASE represent the millions of people who care more for earth and people than for profits.
Response: Comment acknowledged.	
Hammes, Janet	We need to protect our natural environment. Once damaged it can never be restored to what existed originally.
Response: Comment acknowledged.	
Heuer, Genevieve	It's right for our children!
Response: Comment acknowledged.	
Hickman, Kelly	Pope Francis' encyclical, Laudato Si', calls all of us, and particularly us Catholics, to defend the Thin Green Line - a movement built on people power that is preventing dirty and dangerous fossil fuels from being exported through our region. The proposed oil holding facilities in Grays Harbor County will increase the risk of spills, accidents, and pollution; and there is no way to mitigate significant environmental damage to tribal resources and local communities. We can do better, both for the Grays Harbor region and for all impacted neighborhoods along the rail lines.
Response: Comment acknowledged.	
Hines, Linda	We are to be stewards of this beautiful earth God created--not destroyers.
Response: Comment acknowledged.	
Hodgin, Richard	Choose life so that you and your children will live.
Response: Comment acknowledged.	
Holcomb, Peter	A treaty is the supreme law of the land according to Art VI if the constitution, and any risk of a spill is a violation of the Point Elliot Treaty. It is also a crime against future generations who will be diminished or destroyed by the combustion of fossil fuels. Keep it in the ground.
Response: Comment acknowledged.	
Holm, Patricia	As Pope Francis is saying, We are facing the biggest threat to civilization ever and we must act quickly to save our environment for the children. Stopping the oil train shipments of oil is important to solving the crisis. It doesn't matter where on the globe the oil is burned, it will affect us all and is.

Commenter Name	Comment
	Also, a spill of this oil is not possible to clean up...just a small portion is, and all the traffic obstructions we do not need. Our State has little to gain from allowing these terminals and oil traffic and so much to lose for so many citizens and businesses.
Response: Comment acknowledged.	
Hopps, Don	As Catholic Christian, I believe Pope Francis has clearly stated the principles upon which a Christian of conscience should embrace the natural environment and then applied strongly to the particular issues raised by the proposed projects. My experience in working in this state on environmental and justice issues has, on a practical level, confirmed the wisdom of this religious perspective. Not only has this experience demonstrated the value of protecting our fragile environment, it has also taught me that the promise of economic benefit from these projects never materializes for the local communities that come to depend on them. They are at best pipe dreams and, all too often, deliberate misrepresentations meant to ensnare the unwary.
Response: Comment acknowledged.	
Horman, Nancy	Exporting oil to other countries will still add to the global air and continue to make the air we breathe hazardous for our children and future generations. It will also continue to add to climate change and further disasters.
Response: Comment acknowledged.	
Jack, Margaret	We are stewards of the earth and have a responsibility to sustain life and not take it.
Response: Comment acknowledged.	
Jancoski, Loretta	We humans are intelligent, conscious beings, making us special and responsible for making decisions that ensure the health and well being of ourselves and the land, water, and air that sustains us. As both history and science have shown, allowing more fossil fuel entities on our Washington shores is irresponsible and dangerous, putting our present lives and our future at risk. We cannot in good conscience do this. As one who understands that we humans are co-creators with God in determining the future of our planet, it is clear that we cannot allow any action that would harm our planet's ability to support healthy life for all earth's inhabitants. Oil shipping terminals are too potentially dangerous for us to allow. As human persons we are gifted by our creator with intelligence and imagination. As intelligent beings we have begun to learn what makes life on Earth livable and sustainable. Having that knowledge places on us the responsibility to make decisions that will ensure healthy life for all Earth's inhabitants. As persons gifted with imagination, we can find ways to stop actions like the projects planned for Grays Harbor and at the same time find new and better ways for creating jobs and supporting healthy communities. We know that our future is in jeopardy and we have the imaginative ability to figure out how to avoid the disastrous effects of actions we take now. The Grays Harbor projects are an affront to our intelligence and imagination. Please abandon them.
Response: Comment acknowledged.	
Johnson, Betsy	My thoughts to industry: As we learn more about our galaxy, we marvel at the realization that we may inhabit the only planet which has the delicate balance of circumstances necessary to support life in all of its wondrous forms. Think about it. Do you really want to be in the business of knowingly putting life at risk? Is that what your want your life to be about? We know that humans can exist quite well without the types of extravagances that harm our ecosystems. Our American Indian and Alaska Native kin have proven this for thousands of years. "Providing jobs," and "Providing services," in economically depressed communities are thinly-veiled excuses for pushing forth the profit-making agenda in places where people feel desperate. The profits will not even stay within those communities. We also know that carbon fuel sources will largely be phased out in the years to come, and that the rush is on to make money from those sources while it is still possible. Each of you, consider instead choosing a legacy of renewal. NO! to fossil fuel rail projects. NO! to fossil fuel terminals in Grays Harbor.
Response: Comment acknowledged.	
Johnston, Lloyd	I believe that we should be good stewards of God's creation. That stewardship includes preserving the beauty and purity of our natural world. It also includes preserving the lives and habitats of God's

Commenter Name	Comment
	creatures. Allowing the transportation of more crude oil to the coast of Washington state just increases the opportunity for spills large and small that all spoil the land and water that they fall on and degrade the habitat of both animals and people (all God's creatures). Washington state is a showcase of God's finest creations. The coastal shoreline is a beautiful home to creatures and plants that will not survive a fossil fuel spill. Why would we Washingtonians support an activity (oil transport) that can destroy centuries of beauty to support short-term profits for a small number of people?
Response: Comment acknowledged.	
Johnston, Robert	Oil companies have proved through their actions and their history that there will be oil spills wherever they carry out their operations. Monitoring and assessment of the impacts of these spills has been incomplete and often deceptive. Marine environments especially are vulnerable to lasting and even irreversible damage. The introduction of, among other toxic substances, polycyclic aromatic hydrocarbons (PAHs) into the water and the sediments where marine organisms dwell can cause long-term impacts at all trophic levels up to and including salmon, birds, orcas, and other large marine species. Those organisms that do not metabolize PAHs, may bioaccumulate and concentrate them and pass them along to predator species. Organisms that do metabolize PAHs, a group that includes larger marine species, suffer the negative effects of the by products of that metabolism, including cancers and infertility. The Washington coast in general, and Gray's Harbor specifically, can ill afford more petroleum contamination.
Response: See Response to FL1-1. Also refer to the Master Response for Mitigation Framework.	
Karlson, Fred	We are to take care of our environment, not continue to pollute it or to endanger the wildlife found therein. There are new technologies, especially solar, that are very price competitive and renewable and far less polluting.
Response: Comment acknowledged.	
Keefe, George	The health of the most vulnerable people in our community is imperiled.
Response: Comment acknowledged.	
Kenyon, Sharon	My faith adds to my feeling very responsible for caring for the health of our planet and it's people. Oil and gas pollute our air, land, and water. The added dangers of an oil spill on the Columbia are frightening. At this time of trying to lower our CO2 and methane levels, we do not need to be producing additional oil.
Response: Comment acknowledged.	
Knudson, Dorothy	This is the only earth we have and we're supposed to be responsible stewards.
Response: Comment acknowledged.	
Lakey, Julia	Human activity is harming our planet. I want to honor Creation and participate in its renewal.
Response: Comment acknowledged.	
Lapic, Greg	I believe that the dangers to the immediate environment through which the oil is being transported and then further to the global environment when it is burned do not justify the approval of the permits. Thank you.
Response: Comment acknowledged.	
Lapic, Margaret	It is of global significance that we reduce our reliance on fossil fuels. We have a moral obligation to speak up when people's lives and livelihoods and homes are increasingly threatened.
Response: Comment acknowledged.	
Larco, Dorothy	In the first place we shouldn't be exporting oil at all. I think everyone knows that most of the world's oil has to stay in the ground. We should not produce more than what we need for ourselves. And as for shipping it through the beautiful Northwest: it's dangerous to all the communities it passes by and through--not to mention going against Native Americans' treaty rights. The risk of spills, derailments, explosions, storing oil in an area subject to tsunamis...please don't do this to us!
Response: Comment acknowledged.	
LeBlanc, Judy	As a person of faith, moving ahead with this project, in light of the information regarding the degradation of the environment, the safety hazards and threat to human health and life is immoral

Commenter Name	Comment
	and an abdication of our duty as stewards of the earth. Please consider seriously all the questions and concerns that have been raised regarding this project with this in mind.
Response: Comment acknowledged.	
Lemaire, Pauline	We are truly blessed to be part of God's creation. We need to care for creation and we especially have responsibility for care of the earth. We need to move away from fossil fuel to renewable energy in order to save our planet and the people living on it. We do not want more oil being pumped out of the earth and especially not want it being transported across our lands. The dangers of spills and lives lost in accidents is Great! We do not want this in any land much less our own. Please care for creation and all of us living in it.
Response: Comment acknowledged.	
Low, Sammy	Do we honor or do we disregard the Quinault Nation's treaty rights? Do we treasure or do we risk the loss of pristine habitat for shorebirds and water creatures? What would your Jesus do?
Response: Comment acknowledged.	
Lundahl, Dorothy	My faith tells me to take care of the whole creation! Air, water, creatures, the coming generations. Meaning stop the dirty oil transporting which has many places where spills are able to happen. All the cleaner energy sources are being used and they should be increased as fast as possible. This dirtiest oil should be not be allowed!
Response: Comment acknowledged.	
Mackey, Sally	Oil and oil transportation contribute to global warming, a moral issue. Climate change must be reversed before it is too late for all living things.
Response: Comment acknowledged.	
Mackey-O'Brien, Melinda	We have to be in the forefront of Creation care - this community, this state. There is too much risk to the health, well-being, survival of all living creatures, ecosystems to allow any oil holding facilities in Grays Harbor County. We know this, we know better. We can do better. Please don't allow this.
Response: Comment acknowledged.	
MacLeod, Dianna	There is no separation between ourselves and the air, land, and waters of our home. To pollute one is to pollute the other. The death and degradation caused by fossil fuels can no longer be tolerated by people of faith; this is a moral as well as economic choice.
Response: Comment acknowledged.	
Maddox, Michael	Please declare where Washington State stands on our state's and our country's energy future. Please disapprove the proposals for more oil-holding facilities on our coast and for more oil-transport trains transiting our land. Instead, make a statement that Washington State is redirecting its money, time, talent, and creativity towards creating a new future that's powered by renewable energy rather than propagating an old-energy technology that's now known to be a major cause of global warming. The facts are in: fossil fuels are a major cause (along with deforestation) of the global warming that's causing more severe storms, acidifying the oceans, creating drought conditions, causing the extinction of many species, and that will cause the migration of millions of people as ocean levels rise. As stated in the November issue of National Geographic: "Since 1992, when the world's nations agreed at Rio de Janeiro to avoid dangerous anthropogenic interference with the climate system, . . . we've added almost as much carbon to the atmosphere as we did in the previous century. Last year and the past decade were the warmest since temperature records began" (Cool It: The Climate Issue, National Geographic, November 2015, p. 14). Fossil-fuel-produced CO2 levels in the atmosphere are rising, and they will affect our future, but even more so, they will affect our children's future. We know the causes and we know the effects. To build more oil-holding facilities on the shores of Washington State, and to increase the numbers of trains transporting oil across our state at a time when we should be phasing out fossil fuels sends an in-your-face statement that we don't care about the facts, we don't care about our children's future, we don't care about the people living in areas affected by drought or by those living in areas affected by ocean-level rise, and that we don't care about the people affected by increased severity of storms.
Response: Comment acknowledged.	

Commenter Name	Comment
Maris, Celeste	I cannot believe that the Bowerman Basin and Grays Harbor area would be considered as a site to ship or process oil. The effects of a spill would be catastrophic--to the environment, including us humans. It is a noble concern to increase jobs in the Grays Harbor area, but only IF those jobs aren't putting the environment at risk. Use your talents and time to create CLEAN jobs that won't endanger the area. Leave the oil and coal in the ground.
Response: Comment acknowledged.	
Mark, Jonathan	We do not need oil as much as we need our land and water clean.
Response: Comment acknowledged.	
Martin, Hannah	My faith asks that we care for and protect all of creation, including the poor. I know that it would have the greatest harm to the poorest and most vulnerable of the community and environment were anything to happen. This project would be for enhancing the lives of the wealthy while diminishing the quality of life for the local ecosystem and its human and animal inhabitants.
Response: Comment acknowledged.	
McKenna, Candace	For the sake of the future of our children and their children, we should be working to protect the earth by reducing consumption of fossil fuels not taking steps to increase consumption.
Response: Comment acknowledged.	
McKenna, Lauren	My faith propels me to take a stand against environmental injustice. But this is not about God-made-the-earth-so-we-should-care-for-the-earth stuff. While that is true and is what I believe, I also believe that this is about caring for the communities that would be most directly impacted by a spill or explosion, and for future generations. It is easy for big oil to look at the big picture about how do we transport crude oil. I get it. I get it because care and concern for the environment and people are NOT their priority. The community of Hoquim, of which I have many friends, deserves the full extent of this environmental impact report to be known. The risk of losing money because a project is blocked is NOT the same as the risk of permanent environmental damage.
Response: Comment acknowledged.	
Milliren, Patricia	Even if there were ways to mitigate, I would be against oil shipments across our state. Our way of life and our economy need to move to alternative sources of energy and we should NOT be encouraging other nations to use oil either. Who benefits from such ill-conceived projects? Certainly not the locals who are in danger of spills and explosions. Certainly not the fish and wildlife who are in daily jeopardy for their lives. Not the waters and air that must take in all the pollution associated with such projects. IT IS SIMPLY NOT ACCEPTABLE TO CONTINUE ENDANGERING OUR CREATOR'S EARTH AND ALL LIFE ON IT FOR PROFIT FOR A FEW. The Washington coast --and all the inland areas that would carry the train tracks--and all the people along the way, tribes and more recent residents--are far more precious than any money to be made by the oil companies.
Response: Comment acknowledged.	
Moore, Julia	I support the protection of Grays Harbor's environment and people by rejection of the proposal to build new oil terminals. I urge you to invest in safer, greener, renewable energy alternatives and make all efforts to end dependency on fossil fuel energy sources. I also urge you to honor the treaty rights of the indigenous peoples of the Grays Harbor area that protect their land use and fishing rights against pollution and total destruction by this proposed terminal.
Response: Comment acknowledged.	
O'Brien, Tim	Please don't allow these oil holding facilities
Response: Comment acknowledged.	
Parsley, Adina	We have been given an exquisitely beautiful and interconnected creation. And we now know that we need to leave fossil fuels in the ground if we are to not destroy this creation for future generations. How can this project even be considered once the DEIS has revealed its cost? Think of the children and grandchildren who are dependent upon us to make the right decision and then make the right decision. Deny these facilities and be stewards of the earth, not destroyers.
Response: Comment acknowledged.	
Pascual, Cielito	Earth is our only home. Keep our planet and all life sustainable. Share and save the world.
Response: Comment acknowledged.	

Commenter Name	Comment
Patton, Marcia	Concern about breaking Treaty rights and concern about loss of habitat for shore birds and all the reasons stated above. Protect our shores and give the rights to our Native brothers and sisters!
Response: Refer to Draft EIS Section 3.12, *Tribal Resources,* and Section 4.7, *Impacts on Resources,* for descriptions of potential impacts that could result from the proposed action.	
Patton, Rev. Kathleen	I believe our state should be investing and supporting renewable energy projects instead of creating capacity for further carbon pollution. A few short term jobs can never offset the destruction of ocean acidification, sea level rise, depletion of our snow pack, increased wild fires and drought caused by climate change. The department of ecology is our only protection from these enormous health hazards that disproportionately harm the poor. We look to you for leadership.
Response: Comment acknowledged.	
Purdy, Liz	I care as a person of faith because it's clear that all the systems on our earth are intrinsically linked with complexities we will never fully understand as humans. You simply cannot mitigate for certain scenarios. Technology cannot save us. If you alter one piece of the system, it impacts other parts of the system unknowingly. We cannot allow oil holding facilities in Grays Harbor County.
Response: Comment acknowledged.	
Renner, Sister Jeri	The danger of crude oil transport spills does not support our obligation to preserve the earth. Air Pollution, accidents, harmful impact on our resources and environmental damage, are just a few of the reasons why I oppose shipping oil by rail.
Response: Comment acknowledged.	
Rickman, Katie	It is against my moral values to support infrastructure that furthers climate change. The Pacific Northwest should be a leader in clean energy instead of fossil fuels. Stop all new fossil fuel plans!
Response: Comment acknowledged.	
Ridgeway, Deb	God created the world and tasked us with caring for this beautiful creation. As the earth is what sustains life in all its forms, we must consider and treat the earth as our own body...we must wake up to the interconnection we all have and love the earth, our wonderful creatures, our neighbors near and far and ourselves. When we disrespect the earth, we disrespect all gifts that God has provided and we destroy a part of all of us.
Response: Comment acknowledged.	
Rimer, William	One oil spill will destroy Grays Harbor.I am against oil terminals in Hoquiam.These proposed oil terminals are not safe.These oil terminals will leak.These oil terminals will hurt our Grays Harbor.I have owned a home near here for 32 years.I fish.I have many tribal friends who fish.We all need the fish and clams to live.One oil spill and we will go hungry in the winter.
Response: Comment acknowledged.	
Ruha, Catherine	I care because I am aware of the abundance of gifts that I am given by the Earth. I am aware of how much I take as a human from the Earth. I am grateful for these gifts and want to protect the water that we drink and the air that we breath from the poisons that are generated in the oil and coal business.
Response: Comment acknowledged.	
Russell, Rev. Dr. Richard	I care, as a person of faith, because the earth, and all its inhabitants, is precious and needs to be protected.
Response: Comment acknowledged.	
Rutherford, Francie	We simply can not take a chance of an oil spill, either because of a train derailment or because of transporting oil by tanker. Please say no to the plan. We must wean ourselves from fossil fuels.
Response: Comment acknowledged.	
Schaeffer, Kathy	I am opposed to oil terminals in grays Harbor because it will negatively impact the Quinault Nation's treaty rights. There will be an ongoing threat of oil spills in our waterways. Traffic tie-ups will block emergency response vehicles and access to businesses, creating financial loss and leading to business closures. There is sufficient insurance to cover costs of an accident. We cannot pretend to ignore the danger of storing crude oil in a tsunami zone.

Commenter Name	Comment
	I care about the loss of pristine habitat for shorebirds and other creatures, and the grave losses to tourism and the fishing industry which would occur if and accident happens in the stormy narrow straits of Grays Harbor. Like most of the citizens of the towns bordering the rail lines I live within the explosion range zone and will be constantly reminded when I am home and as a I commute on the roads bordering the rail lines of the potential for oil train derailments and explosions. The Impact of pollution from the trains and the terminal vented tanks will be felt by communities along the entire rail line, effecting our quality of life and health.
Response: Refer to Draft EIS Section 3.12, *Tribal Resources,* and Section 4.7, *Impacts on Resources,* for descriptions of potential impacts that could result from the proposed action. Refer to the Master Response for Seismic Risk and Design Requirements. See Response to FL1-1.	
Scheer, David	Planet Earth, the environment, and all life on Planet Earth was created by God. Planet Earth is mankind's home. We must protect and take care of it. At one point in our existence, the use of coal, oil, and other fossil fuels was necessary for our energy. They no longer are. Plus, transporting it around the country on trains is unsafe and dangerous. Spills and great damage have already occurred in many places, wrecking the waters and environment. We must END this foolishness, done all for the sake of money, money, money. Those still in the coal, oil, and other fossil fuels businesses should get out of them, make the switch, and put their monies in solar, wind, hydro, geothermal, and all the other 'safe', alternative energy sources mankind's developed, which are the INEVITABLE future anyway!! Fossil fuels belong to the dinosaur age and should stay in the ground. Anyone with a brain can foresee this. So I am AGAINST the oil-by-rail and fossil fuel terminals being attempted at Gray's Harbor, Wa---or anywhere else, for that matter---for the above reasons and because I don't want to risk harming the environment---my home---that God created for me to live on.
Response: Comment acknowledged.	
Schroff, Mary	We need to protect our environment. Too much irreversible damage can be done by one accident. There are spills and train wrecks that have already occurred in other places. This type of accident or worse would cause even greater damage to this area and the areas that oil would be transported through. I believe that we are expected to care for God's creation. Let us not harm this coastal area.
Response: Comment acknowledged.	
Schultz, Margaret	Creation is God's first revelation to man. To willfully destroy it is a sacrilege. To destroy it is to destroy mankind. It is the greatest security threat to the world.
Response: Comment acknowledged.	
Scollon, Suzanne	Pope Francis said that a crime against the Earth is a crime against humanity. In this case, it is a crime against the Quinault nation as well as the whole planet.
Response: Comment acknowledged.	
Shearer, Ruth	There are over a dozen good reasons not to build oil terminals on Grays Harbor, but I'm especially concerned with the great increase of oil trains on our railroads interfering with the shipment of crops from Eastern Washington to their markets overseas. It is far more important to send food where it is needed than to send a dirty, outdated fuel that will increase their air pollution which is already bad. Washington state's economy is very dependent on agriculture, while it will gain very little from oil trains transiting our state.
Response: Comment acknowledged.	
Sherman-Peterson, Deejah	My faith teaches respect for the interdependent web of all existence of which we are a part. We must be moving away from the use of fossil fuels, not digging them up and burning them here and abroad. We can create more jobs by promoting conservation and clean energy while simultaneously protecting life on our beautiful planet.One of the principles of the Unitarian Universalist faith is respect for the interdependent web of all existence of which we are a part. I believe that we humans are not above all other life on Earth but, because we have such power to affect the lives of other beings, we also have the responsibility to act in their best interests. The consequence of so acting will also benefit us.
Response: Comment acknowledged.	
Sherman-Peterson, Ron	As a person of faith, I believe that the earth in all its beauty and bounty was given to our care for all present and future generations both of ourselves and of all other creatures. We need to observe the

Commenter Name	Comment
	precautionary principle and not risk damaging the water, air, and soil on which all life depends. The push for exporting fossil fuels is motivated purely by greed for profit for a few and will not benefit nature, living beings, marginalized peoples, or the common good of civil society at all levels.
Response: Comment acknowledged.	
Silvers, Maria	Yes, I am a person of faith, faith in God and faith in human ability to both use the resources given us AND care for all of creation in the way those resources are used. Extracting, refining, transporting and burning fossil fuels puts too much of creation at risk. The decision before the Washington Department of Ecology and the City of Hoquiam requires them to determine the level of risk they are willing to accept. I respectfully submit that this is an opportunity for them to act on behalf of all of creation, regardless of proximity to the train lines and terminals, and state that the risks involved are unacceptable, for all of us!
Response: Comment acknowledged.	
Smith, Mary Ellen	My faith calls me to be a steward of the beautiful earth that we call home. This means to me that we are morally and ethically bound to care for the land, the air, and the water and to do this we must not approve projects like this that run such high risk for degradation of those resources.
Response: Comment acknowledged.	
Snell, Ronald	Not only do I believe as a Christian that we are called to care for God's creation but for our neighbor. I do not want to put any of my fellow Washington citizens who live along the impacted rail lines nor near the proposed terminals at risk of harm from explosions and additional pollution.It is my understanding that the WA Department of Fish and Wildlife has noted that Greys Harbors is particularly sensitive to the adverse effects of oil spills. Such a spill would devastate marine resources on which many local jobs depend. The risk on an accident is much too great. As a person of faith, I believe we need to use the resources that God has given us responsibility. We should not place a sustainable fishing industry at risk for the sake of a few oil industry jobs that will not last.
Response: Comment acknowledged.	
Spatz, Gerald	As a person of faith, I believe we are called to protect our earth by limiting our use of fossil fuels. The poorest people are the most heavily effected by climate change, as Pope Francis points out.
Response: Comment acknowledged.	
Sperline, George	Accidents will happen. It is not "if" but "when".
Response: Comment acknowledged.	
Stixrud, Janice	I feel called to speak for and help take care of the natural resources we have remaining.
Response: Comment acknowledged.	
Sullivan, Sarah	The draft EIA is intended the alert all parties about the potential environmental affects, and if they are disastrous then the project is supposed to be halted not allowed to move forward. Otherwise, what would be the point of the EIA. Please respect the findings and hopefully, we can a more robust dialogue for future economic initiatives.
Response: Comment acknowledged.	
Sword, Carol	It is wrong to violate the Quinault peoples' treaty rights and foolish to think there are no consequences for acting greedy and selfish.
Response: Comment acknowledged.	
Taninecz, April	We need to live and develop our futures with respect for the natural world and systems that sustain us. This includes our children and young people, who are becoming disillusioned and apathetic in the face of short-sighted corporate policies that destroy long term health and wealth of our natural world. Sustainable living is an ethical and spiritual responsibility.
Response: Comment acknowledged.	
Taverne, Anne	I am opposed to extraction and transportation of dirty and potentially forms of fossil fuel. Please act to protect the environment and our population from unnecessary forms of fossil fuel extraction.
Response: Comment acknowledged.	
Van Daalen, Christ	Just say no. Climate Change is the moral equivalent of WWII - we shouldn't have to wait till the Oil Train bomb gets dropped in another one of our communities to take the high ground and put all our

Commenter Name	Comment
	nation's resources behind trying to stop it; instead of feeding the fire and endangering innocent lives in the process.
Response: Comment acknowledged.	
Wake, Debra	As a person of faith with Chippewa Indian heritage, I stand against irresponsible stewardship of the environment. This project has the potential to cause harm to people and the environment with the transport and storage of carcinogenic and pollutant oil on land that is tsunami zoned. Does it make good sense to put storage tanks in an area that would adversely effect tribal lands, fishing and aquatic animals? Not to mention the beauty that so many visitors and vacationers come to visit!I don't believe it does. This is an opportunity to do right by the earth's environment that we've all been tasked to protect. As a people we have made enough poor decisions for which we have and continue to pay a very high price. When we have a chance to foresee a mistake in progress we need to be responsible citizens and speak up.Please, please don't subject Grays Harbor to this negative environmental hazard.
Response: Comment acknowledged.	
Waldorf, Elizabeth	We have an obligation to care for our home. Most adult nesting birds remove fecal pellets from their young from the nest. Similarly, we must work to maintain a clean environment to promote the diversity of life that thrives on Earth. That diversity confers stability. As greenhouse gases accumulate they will destroy the conditions required for many life forms. It's critical that we keep our home clean, free of pollution and healthy.
Response: Comment acknowledged.	
Ward, Troy Faith	The beauty and oneness of creation is a nutrient our souls cannot do without.
Response: Comment acknowledged.	
White, Carolyn	I care because God created all things--this world and beyond and gave us (humans) a responsibility to care. Mining the earth and transporting this resource will contribute so much carbon that the world as we know it will be unspeakably changed forever.
Response: Comment acknowledged.	
Wichar, Den Mark	Earth belongs to all of us, & yet to none of us.
Response: Comment acknowledged.	
Wiederhold, Joe	Take care of mother earth. There is no planet "B"!
Response: Comment acknowledged.	
Wilson, Barbara	All life is sacred.
Response: Comment acknowledged.	
Wilson, Bea	As a person of faith and recipient of the bountiful gifts bestowed upon us by our Creator, I have the individual responsibility to be a steward to preserve, conserve, re-cycle, and restore our natural resources that we have dominion over. Our natural resources are life-sustaining...ALL LIFE for ALL GENERATIONS.
Response: Comment acknowledged.	
Wright, Janet and Richard	Please protect the people of Gray's Harbor and Washington state from the risks of oil train.
Response: Comment acknowledged.	
Zimmerle, Jessica	As a young woman of faith I am highly concerned by unwise investments in fossil fuel. Not only does this go against my moral values by endangering communities all along the rail lines; it is also an economically irresponsible allocation of limited resources in infrastructure that will be soon obsolete. It is not good stewardship to leave a mess behind for future generations to clean up. The DEIS shows that the risks of this project cannot be mitigated; that is unconscionable. Please deny these permits. Consider an alternative for economic stimulus in the Grays Harbor Community that is a long-term solution, such as exporting clean WA grown products.

Commenter Name	Comment
Response: Comment acknowledged.	

Table 7-12. Names Associated with Earth Ministry Form Letter

Allan, Inez	Allen, Katy	Allen, Teresa	Anderson, Glen	Armstrong, Jude	Ayala, Marlene
Bader-Nesse, Marilyn	Baker-Smith, Gerrit and Elizabeth	Banks, Julie	Barr, Nancy	Bassett, Beverly	Belshaw, Mary
Bergholz, Jean	Betz-Zall, Jonathan	Black, Rachael	Blakemoe, Rosemary	Blakney, Richard & Elizabeth	Bosh, Joni
Botch, Margaret C	Bougher, Thomas	Bowman, Elsa	Boyden, April	Bozied, Shary	Brevig, Lynn
Brown, Rev. Mary Karen	Cacciari, Ann	Campbell, Connie	Carcelli, Dennie	Carr, Mary M	Cochrane, Julia
Colangelo, Annapoorne	Colson, Lynn	Corbett, Todd	Cornwell, The Rev. Marilyn M	Corum, Edythe	Covert-Bowlds, Chris
Cruz, Deborah J.	Cummings, Judy	Dahlstrom, Lola Elizabeth	Dale, Garry	Daletski, Anne	Davies, Valerie
Davis, Joan	DeGooyer, Elise	DeLorenzo, Anthony	DiGiacomo, Ron	Douglas, Virginia	Durnan, J. Richard
Eckels, Alison	Edwards, M.D., David L.	Elkins, Anne	Ellingham, Nancy	Ertelt, Jonathan	Ervin, Keith
Farness, Janet	Fine, Kelly	Follett, Thelma	Ford, Robert M.	Fournier, Dean	Fox, Larry L
George, Judith	Glidden, Hal	Goethe, Teresa	Goodwin, Amanda	Grant, Liz Ellis & Brenda	Gray, Alice D.
Gribble, Judy	Guss, Elizabeth	Hallman, Holly	Hammes, Janet	Hartmann, Lorraine	Healey, Alicia
Heuer, Genevieve	Hickman, Kelly	Hines, Linda	Hodgin, Richard	Holcomb, Peter	Holman, Cherie
Holmn, Patricia A.	Hopps, Don	Horman, Nancy	Hudon, SP, Charlene	Jack, Margaret K.	Jancoski, Ph.D., Loretta
Johnson, Betsy	Johnson, Lorraine D	Johnson, Lorraine D.	Johnston, Lloyd	Johnston, Robert	Karlson, Fred
Kauffman, Thelma and Bob	Keefe, George	Kenyon, Sharon	Knudson, Dorothy	Krislock, Evita	Kuciej, Walter
Lagerloef, Marcia	Lakey, Julia	Lambert, John	Lapic, Greg	Lapic, Margaret	Larco, Dorothy
LeBlanc, Judy	Lemaire, Pauline	Lenczyk, Susan	Lince, Mike	Little, James W.	Loerch, Ronna
Low, Sammy	Lundahl, Dorothy	Mackey, Sally	Mackey-O'Brien, Melinda	MacLeod, Dianna	Maddox, Michael
Maris, Celeste	Mark, Jonathan	Marti, Thomas J.	Martin, Hannah	McGann, Mary	McGarry, Christine
McKenna, Candace	McKenna, Lauren	Milliren, Patricia A.	Moore, Julia	Mumm Felnagle, Debby	Murray, Catherine
O'Brien, Tim	Oulman, Lynne	Palumbo, Julieann	Parsley, Adina	Pascual, Cielito	Patton, Marcia J
Patton, The Rev. Kathleen	Petterson, Carl	Purcell, Jennifer	Purdy, Liz	Renner, Sister Jeri	Rickman, Katie
Ridgeway, Deb	Ried, Barbara	Rimer, William	Robson, Sandy	Ruha, Catherine	Russell, Rev. Dr. Richard J.
Rutherford, Francie	Schaeffer, Kathy	Scheer, D.C., David M.	Schroff, Mary	Schultz, Margaret	Schumacher, Sandra
Scollon, Suzanne	Shearer, Ruth W.	Sheridan, Bonnie	Sherman-Peterson, Deejah	Sherman-Peterson, Ron	Shilling, Bruce
Shoemake, Gayla	Silvers, Maria	Smith, Mary Ellen	Snell, Ronald	Soeldner, Walther	Spatz, Gerald
Spencer, The Rev. Jeffrey	Sperline, George	Stephens, Jeffrey, R	Stixrud, Janice	Sullivan, Sarah	Swartz, Chrissy
Sword, Carol	Taninecz, April	Taverne, Anne F	van Daalen, Chris	Wake, Debra	Waldorf, Elizabeth
Ward, Troy Faith	White, Carolyn	Wichar, Den Mark	Wiederhold, Joe	Williams, Bertram D.	Willimason, Barbara
Wilson, Barbara	Wilson, Bea	Wright, Janet and Richard	Zimmerle, Jessica		

FL8 Unnamed

Comment FL8-1

Washington Department of Ecology

City of Hoquiam

RE: Westway and Imperium Terminal Services Expansion Projects EISs

Dear Washington Department of Ecology and City of Hoquiam

The findings in the DEISs for Westway and imperium oil terminal proposals in Grays Harbor show that the risks of oil spills cannot be fully mitigated and the environmental damage to marine habitat and wildlife could be significant. Similar findings exist for waterway contamination, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings.

Due to these numerous and enormous risks, I ask that you reject the Westway and Imperium oil terminal proposals.

Grays Harbor is a site of hemispheric importance to birds. Surrounded by six important Bird Areas, Grays Harbor is host to hundreds of thousands of resident and migrating birds that rely on this Pacific Coast estuary. Several species protected under the Endangered Species Act are likely to be harmed by these projects, including the Marbled Murrelet, Snowy Plover, and Streaked Horned Lark.

Recent research by the Washington Department of Fish and Wildlife shows that the Pacific population of the Red Knot uses the North Bay of Grays Harbor almost exclusively as its one refueling site during its long spring migration from Mexico to breeding grounds in Alaska and beyond. One oil spill could have devastating effects on this species' survival. Furthermore, the cumulative release of toxic chemicals and oil leaks is known to have negative effects on endangered salmon and other small fish upon which birds rely.

There are better ways to meet our energy needs. Washington state should continue to lead the nation on safe, renewable clean energy solutions and say no to more oil and coal. Building more infrastructure for yesterday's energy would be moving in the wrong direction.

I support the protection of Grays Harbor, its marine life, and its people, and urge you to reject the proposed Westway and Imperium oil terminals.

Sincerely,

Response to FL8-1

Refer to the Master Response for Purpose and Focus of the EIS for information about the purpose of the EIS.

Chapter 3, *Affected Environment, Impacts, and Mitigation*, addresses potential impacts from construction and routine operation of the proposed action. Increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) and potential consequences (e.g., release of crude oil) are addressed in Chapter 4, *Environmental Health and Safety*. Final EIS Section 4.7, *Impacts on Resources*, clarifies that while impacts would depend on the circumstances of the incident, the resources described in Chapter 3 could be affected. Final EIS Section 3.5, *Animals,* and Appendix F, *Special-Status Species*, have been revised to include birds of conservation concern that could occur in the study area.

Draft EIS Chapter 4 presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies

additional mitigation measures in Sections 4.4.3, 4.5.3, and 4.6.3 that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident at the terminal, along the PS&P rail line, or in Grays Harbor, respectively. Draft EIS Chapter 6, *Cumulative Impacts*, presents the analysis of risk of oil spills, fires, and explosions under cumulative conditions. As noted, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7*, Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion, including impacts on natural, cultural, and tribal resources, including sensitive animal species.

Table 7-13. Names Associated with Unnamed Form letter

Armstrong, KC	Bagley, Marjorie	Barnard, Lucille T.	Barrett, Katherine	Beardsley, Stephen	Bronsdon, Melinda
Buchanan, Lillian	Chiang, Sophie	Dufford, Dawn	Hubly, Nancy	Illegible	Illegible
Jennings, Hugh A. & Beverly B.	Kacoroski, Joy	Kacoroski, Natasha	Kacoroski, Sawako	Karcoroski, Chris	Kearsy, James P
Kelly, Sheryl	Kendall, Kimberly	Kulkarni, Amit	Lie, Margaret R	McGreedler, Jan	Minnich, Elizabeth
Nelson, Phyllis	Ozatay, Elva	Ozatay, Sakip	Patton, Jean	Relsenbichler, Reg	Russell, Lisa
Russell, Seichi	Shepler, Richard	Sown, Maureen	Syroul, Phyllis	Thompson, Linda S.	Waters, Leslie
Weisel, Nancy A.	Westerlund, Karen	Wherritt, Bart W			

FL9 Environment Washington

Comment FL9-1

Regina McCarthy

Administrator of the EPA

Dear Washington Department of Ecology and City of Hoquiam:

The findings in the DEISs for Westway and imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and the environmental damage could be significant. There is simply too much risk and too little reward from these proposals: Grays Harbor communities would take on the risk and oil companies would reap the profits, while Grays Harbor would become a throughway for oil going elsewhere.

Much of what makes Grays Harbor special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters.

The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line from Aberdeen to Chehalis and all the way to the source of the oil in North Dakota and beyond.

There are better way to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming. Building more, big infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor. Washington state should continue to

lead on safe, renewable clean energy solutions and say no to more oil and coal. I urge you to do everything in your power to stop these dirty and dangerous projects.

I will also be copying Governor Inslee as this pertains to the future of Washington State.

I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.

Sincerely,

Response to FL9-1

Refer to the Master Response for Purpose and Focus of the EIS.

Table 7-14. Names Associated with Environment Washington Form Letter

Bates, TaraLynn	DeClements, MS. Mari	Horman, MS. Nancy	Horman, MS. Nancy
Robitelle, MS. Diane	Segerhammer, MR. Jacob	Tethys, Ms Yara	Vinson, MR. Greg

FL10 ForestEthics

Comment FL10-1

Please, Westway and Imperium crude oil-by-rail terminal EISs

Washington Department of Ecology and City of Hoquiam,

Dear Washington Department of Ecology and City of Hoquiam:

The findings in the DEISs for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated.

There is simply too much risk and too little reward for these proposals. Grays Harbor communities would take on the risk and oil companies would reap the profits.

There are better ways to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming. Building more, big infrastructure for yesterday's energy is the wrong path and a big economic gamble for Grays Harbor.

I will also be copying Govenor Inslee as this pertains to the future of Washington State.

I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.

Sincerely,

Response to FL10-1

Refer to the Master Response for Purpose and Focus of the EIS.

Table 7-15. Unique Comments Associated with ForestEthics Form Letter

Commenter Name	Comment
Avery, G.P.	Please add my name to the list of those who oppose this egregious action that jeopardizes wildlife for the sake of a small benefit to very few people.
Response: Comment acknowledged.	
Ellison, Kay	Looking at oil spills around the world, in Alaska's waters and the Gulf Coast in particular, have shown that the effects of oil spills last a very long time and affect all species. Also, trains have been derailing all over the country. I work one mile from a rail line, and often shop at a Farmer's Market a quarter mile from a rail line. This does not make people in our city feel safe! I am curious why Canada wants to ship its oil through the United States instead of through its own land? Sure, there are mountains there, but there are mountains here, too. Perhaps they don't want the danger to their own land.
Response: Comment acknowledged.	
Gopinathan, Narayan	This terminal must be considered in the context of global warming, which threatens all of our common future. If this terminal is rejected, then that means that more fossil fuels can remain in the ground, where they cannot do any damage. If this terminal is built, then more carbon will be pumped into the atmosphere, acidifying our oceans and increasing the threat of climate catastrophe.
Response: Refer to Draft EIS Section 6.5.1, *Air,* for a description of potential cumulative impacts that could result from the proposed action.	
Gudmundson, Lori	Please help our state stay safe and get in step with what is best for our citizens and the world. If you read "This Changes Everything," by Naomi Klein, there is a wealth of research showing how important it is to keep oil in the ground.
Response: Comment acknowledged.	
Kelley, Dorinda	Don't ruin your state and mine in the process. Please stop this madness.
Response: Comment acknowledged.	
Lyman, Michael	NO DIRTY OIL IN OUR WATERS!
Response: Comment acknowledged.	
Mahaffey, Michael	Think about the people you represent and vote from your heart not from your pocket.
Response: Comment acknowledged.	
McConnell, Kelly	I am a lifelong resident of the Pacific Northwest, I own property in the Salish Sea. This is the region that the oil companies are attempting to sacrifice next in their insatiable quest for more profit. Therefore, it is quite clearly NOT worth the risk to OUR environment. Grays Harbor communities would take on the risk and oil companies would reap the profits, as usual.
Response: Comment acknowledged.	
Mosby, Dan	I am a summer resident in Anacortes where I spend significant time sailing in the Puget Sound. I am opposed to the development of Hoquiam as an oil port because of the threat it would pose to the special marine environment there but moreso because of the threat all expanded oil developments pose to the global environment through climate change. In Anacortes, we are proud of the work we have done with Ecology to reclaim our coastlines from the degradation of past industrial development. We share the water of the North Sound with increasing numbers of oil tankers. One oil spill in our harbor would completely negate the progress won through years of work and millions of public dollars. The risk in Hoquiam would be double because of the accompanying threat from oil train accidents. As a person who is on the water every year it is possible to observe firsthand the local effects of climate change. Warming waters have contributed to the dieoff of sea stars and other inter tidal life. This past summer's drought brought the Skagit down so low that a proportion of the salmon did not enter the river. Major oil developments lead to more carbon in the atmosphere which leads to more devastating environmental effects we can observe locally and around the world.
Response: Comment acknowledged.	

Commenter Name	Comment
MoscaClark, Vivianne	We all ready know how drilling oil in the sea's works. The gulf comes to mind as well as the exxon spill up in Alaska. Then there is all the exploding trains. How much more has to be destroyed before you all stop this. All the destruction was for making money. The cost is to high. Stop the fools.
Response: Comment acknowledged.	
Stracchino, Keith	I live in the Spokane urban conurbation, travel in the North/South axis in this area is heavily impacted by railroad traffic, extremely long, slow moving trains are a persistent cause of traffic stoppage for quite long periods of time. Like many local residents, I find myself having to find ways to avoid the multiple road/rail level crossings if my journey is time dependent. The alternative routes available are few and far between and involve substantial travel time and distance increases.This problem impacts the transit times of local emergency response vehicles. If the oil industry is permitted to make major increases in these delays as a consequence of their desire to export oil from our west coast we could find North/South oriented traffic brought to a near standstill, this is unacceptable. Due to the extensive network of railroad lines embedded within the city, the consequences of a major derailment and subsequent fire and explosion are highly like to kill or main a large number of people and do major damage to hospitals, medical centers, businesses and homes located adjacent to the railroad corridors.
Response: Comment acknowledged.	
Townsend, Darlene	NO OIL Terminals!!
Response: Comment acknowledged.	

Table 7-16. Listed Names Associated with ForestEthics form letter.

a., nando	alexandra, kathryn	Alletsgruber, Julia	Anderson, Arlene	Anthony, Hal	Armstrong, Jude
Asmus, Sigrid	Aylward, John	Bailey, Ruby	Bancroft, Lois	Bechtholt, Susan	Bessler, Mike
Beverly, J	Birdsell, Dale	Blumenthal, Robert	Brooks, Betty	Brown, Robert	Buckmaster, Matt
Buehler, Lisa	Burr, Eric	Campbell, Linda	Caron, Catherine	Carpenter, Tasha	Causemann, Manuela
Chapman, Max	Christian, Steve	Coon, Edwin & Betty	Copeland, Jeanette	courter, matt	CRAWFORD, ALICE A.
Crowley, Marty	danler, ronaye	Darling, Anita	Davidson, B	Davis, Virginia	Deason, Bartley
DeVito, Susan J.	Dimock, Donald	dix, teresa	Dowson, Eleanor	Drake, Barb	Duggan, Jack
Dyche, Danny	Edain, Marianne	Escobar, Claudia	Fahrenwald, Gill	Fenton, Beverley	Fields, Mary
Fischlin, Segue	Fletcher, Rebecca	foster, lorraine	Gale, Maradel	Gilmore, Thomas	Glidden, Hal
Goldberg, Laura	Grace, Lise	Graham, Charlie	Graham, Linda	Grajczyk, Joyce	Gray, Don
Green, Judith	Grelie, Jimmy	Groot, Emi	Grunbaum, Arthur	Gudmundson, Lori	H., Janet
Halloran, Michael	Hays, Helen	Herndon, Sandra L.	Hit, Roelie	Houghton, Jocelyne	Hughes, Laurel
israel, mirim	Jahn, Catherine	Jenkins, Jacqueline	Joos, sandra	Kallenbach, Cheryl	karlson, fred
kelley, dorinda	kreiner, dennis	LaVerne, David	Lawlor, Bonnie	LeBaron, pat	Leibik, Patricia
Leibik, Susan	Lengel, Elizabeth	Leseney, Estelle	Leslie, Rosemary	Lew, Karen L.	Little, Brona
Lo, rudy	Long, Herb	Lowell, Catherine	Lybæk, Siri	Lyman, Michael	Mackey, Sally
Mahaffey, Michael	Marshall, Dolly	martin, melodiee	Maruki-Fox, Setsuko	Massey, Linda	Maughan, Karen
McCarthy, Carolyn	McClure, Leslie	McConnell, Kelly	McCuen, Gary	McGee, Doug	McGillicuddy, Carole
McGillivary, M	McIntosh, Michael	McKee, Dave	McKeever, Tim	McKenzie, Dan	McMahon, Nancy and James
montford, jennie	Munn, Gary	O'Haire, Hugh	Pantier, Gina	Parris, Michelle	Parry, Rochelle
Pendergast, Betsy	Pepi, Lauri	Perry, Glenn	Peterson, Annie	Pietrowski-Ciullo, Evelyn	Playfair, Beverley
potts, paul	Radcliffe, Steve	Ramel, Alex	Rechetnick, James	Retzer, Susanne	Rietz, Marguerite
robbesom, gea	Roberts, Harriet Edith	Rolston, Stephen Craig	Rothenberg, Florie	Salcedo, Corinne	Sand, Christine
Schneider, Dan	Shanow, Charlotte	Shelby, BC	Simmler, Todd	Smith Shauna	Smith, Ellie
Staton, Janiece	Stonecipher, Rob	Stonier, Polly	Sundberg, Rebecca	Tangney, John	ten Broeke, Trisha

Thom, Michael	Thompson, steve	Trescone, Thomas	Turnoy, David and Geri	Twain, J. Gregory	Walker, David
Walker, Joan	Watts, Elizabeth	Wechsler, Susan	Weed, Ardeth L.	weir, margaret	Whitworth, Amy
Widmer, Jeff	Winterlik, Tina	Young, William	Zamaria, Susan	Zimmerman, Lloyd	

FL11 Friends of the Earth

Comment FL11-1

Washington Department of Ecology

WA

The findings in the DEISs for Westway and imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and the environmental damage could be significant.

There is simply too much risk and too little reward from these proposals: Grays Harbor communities would take on the risk and oil companies would reap the profits, while Grays Harbor would become a throughway for oil going elsewhere.

Much of what makes Grays Harbor special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters.

The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risks,and traffic delays oil trains would bring to communities along the rail line from Aberdeen to Chehalis and all the way to the source of the oil in North Dakota and beyond.

There are better way to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming. Building more, big infrastructure for yesterday's energy is the wrong path and a big economic gamble for Grays Harbor.

I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.

Sincerely,

Response to FL11-1

Refer to the Master Response for Purpose and Focus of the EIS.

Table 7-17. Unique Comments Associated with Friends of the Earth Form Letter

Commenter Name	Comment
Ackerman, Frank	Don't Poison Grays Harbor.
Response: Comment acknowledged.	
Adams, Grace	We can't afford to give up any more of capacity of environment to clean up our greenhouse emissions or any more of our petroleum reserves. We need to electrify transportation and save petroleum for lubricants and feedstock for petrochemicals. Sincerely,
Response: Comment acknowledged.	

Commenter Name	Comment
Amatucci, Vinny	We don't need ANOTHER major spill that will damage the environment! It's time to abandon this idea and work on SAFE, ALTERNATIVE fuel sources!
Response: Comment acknowledged.	
Anderson, Glen	STOP LETTING GIANT OIL COMPANIES DESTROY WASHINGTON'S ENVIRONMENT AND THE WORLD'S CLIMATE!!!!!!!!!!!!!!!
Response: Comment acknowledged.	
Andrew, Deborah	Conservation must be our first response. Application of the Precautionary Principle, the Principle of Do No Harm, and asking, "Is this truly sustainable?" must guide our thinking and evaluation of any proposed solution. We cannot continue the apply the endless growth model. Building more, big infrastructure for yesterday's energy is the wrong path. We have a responsibility to care for Grays Harbor and its people just as we would wish our homes, our communities to be cared for.
Response: Comment acknowledged.	
Angus, Billy	Big Oil has no place anywhere on this Earth!!
Response: Comment acknowledged.	
Asmus, Sigrid	I am writing to you from the Blast Zone, half a block away from BNSF's main line running north out of Seattle, to ask that you give special consideration to the full reach of the area in Washington State that would be affected by any approval of the Westway and Imperium oil terminals now being propose for the Hoquiam area. We are already experiencing the noise and vibration of 10 to 12 oil trains per day. Any proposal to increase oil-by-rail to Hoquiam could only worsen the situation here, in addition to making the provision of anything approaching adequate public safety responses in hundreds of towns across the state impossible. These fossil fuel corporations are counting on taking all the profits, and dumping all the health and safety protection costs of their proposed operation on the Grays Harbor area -- for the long term, and with immense risks to the Columbia and our fragile marine environment too. Only one major railbed failure, spill, or explosion would cause almost irreparable damage. Thank you for considering my comments.
Response: Comment acknowledged.	
Asmus, Sigrid	Gray's Harbor simply does not have access to the needed personnel, equipment, and funding resources to deal with the potential damages caused by a project of this magnitude. These proposals demand far too much risk and offer far too little reward to the city. By design, the setup of this project would put Grays Harbor communities fully at risk, while oil and rail companies would take essentially all the profits -- as Grays Harbor itself would become nothing more than a toxic throughway for oil going elsewhere. Moreover, many Grays Harbor communities have schools, health facilities, police, and emergency facilities right along the rail lines, so that school children would be subject to toxic emissions daily, and a single serious accident could cause immense harm both to Grays Harbor and the very agencies needed in case of an emergency. As someone now living in BNSF's Blast Zone just north of downtown Seattle, I know what it is to live with a potential accident half a bloc away, and fully support protection of Grays Harbor and its people from the Westway and Imperium projects. Thank you for considering my comments.
Response: Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.	
Atwood-Adams, Tanya	I grew up in the puget Sound area and though I now live in NY, smile every time I reflect on its beauty and how much I miss it. Please stand up to big oil and preserve the natural beauty of this region for prosperity.
Response: Comment acknowledged.	
Avett, John	Oil is not a good companion for anything healthy.
Response: Comment acknowledged.	
B, Alana	Solar Roadways are the way of the future. http://www.solarroadways.com/intro.shtml KEEP ALL FOSSIL FUEL IN THE GROUND!
Response: Comment acknowledged.	
Bach, George	How many times do we have to go thru this charade? Stop it once and for all time thanks
Response: Comment acknowledged.	
Barnes, Linda Sue	This is senseless in an area that is free from the damage of the petroleum industry.

Commenter Name	Comment
Response: Comment acknowledged.	
Barry, Jim and Mary Jane	FUrther, we should be moving toward oil independence and renewable energy sources to create jobs in the US and not temporary pipeline jobs.
Response: Comment acknowledged.	
Bartlett, Elizabeth	Oil companies by their nature are concerned only with short-term profit. Governments need to work for their citizens and for the future.
Response: Comment acknowledged.	
Barton, Sabreen	Why are you bothering with ancient technologies? Why not invest in renewable ones instead and set the standards for the rest of the country. Why live in the past when you could be part of a great future!
Response: Comment acknowledged.	
Bartosz, Jane	We all know the risks to our beautiful shorelines and hundreds of organisms, not to mention people's livelihoods, when oil is near.
Response: Comment acknowledged.	
Bau, Roger	Your children today and your grandchildren will have to deal with the climate changes associated with these two proposals.
Response: Comment acknowledged.	
Becker, Rick	Cool the planet. I'm sure they don't want it any more than I'd want an oil terminal in my back yard.
Response: Comment acknowledged.	
Bell, Ruby	The influence of greed is not the way to protect this earth and all of humanity.
Response: Comment acknowledged.	
Belloli, Joyce	Say NO to corporate profits and YES to the planet!
Response: Comment acknowledged.	
Bennett, John	The claimed employment opportunities can be provided through more environmentalfriendly commercial ventures.
Response: Comment acknowledged.	
Berg, Rachel	Save the water and the Earth--stop oil from ruining everything.
Response: Comment acknowledged.	
Bernard, Paulette	Wake up before you ruin this area. Greed won't fix the damage.
Response: Comment acknowledged.	
Bethel, Diana	It's time to recognize that safe oil transport by rail is a deceptive myth.
Response: Comment acknowledged.	
Binder, D.	Here in Maine we have already taken the initiative to prevent oil interests to transport their products into our state...for all the reasons listed below:
Response: Comment acknowledged.	
Blackburn, Daniel	Your concern for the physical environment is important, but it must grow. It must become the most important thing, not something that is simply present or taken for granted or considered as an afterthought. It is the most important thing. Wisdom from the Greater Community - Volume II Marshall Vian Summers
Response: Comment acknowledged.	
Blain, Susan	Don't take a huge step backward, when we need to move forward with safe green energy now.
Response: Comment acknowledged.	
Blalock, Marilyn	Hey you all, haven't you heard of this new up and coming thing? It's called renewable energy and it comes from the Sun. Go figure. If you have an energy spill using solar power, you just call it a sunny day.
Response: Comment acknowledged.	

Commenter Name	Comment
Blomquist, Karen	Curtail Big Oil Industry's destruction!
Response: Comment acknowledged.	
Boatman, Rebecca	THINK OF OUR CHILDREN AND NOT JUST THE PROFITS OF TODAY. WE WANT TO PROTECT OUR WORLD FOR THEM.
Response: Comment acknowledged.	
Bonkoski, Jane	Consider the words--Decency and Compassion to help preserve these magnificent areas for the animals who consider this place as their home. Imagine if a superior being decided that your home didn't matter. I believe you would want some one to help you--just my opinion. Please do the right thing now. Thank you.
Response: Comment acknowledged.	
Bosch, MD, Milton	As a trained organic chemist, I'd be concerned about expanding oil terminals in the Pacific Northwest. As a physician, I'd be concerned about the health effects of oil spills on people and wildlife. Since I'm both of these things, I especially deplore the plans to ruin the Emerald Jewel of our Nation: to expand oil terminals and oil traffic on land and by sea, putting at risk the most beautiful, life-laden part of our country. We can learn to live without petroleum...but we cannot live with poisoned land and waters from the inevitable oil spills that come with that activity. It's guaranteed that spills will occur: just as it's guaranteed that a certain percentage of Ebola patients will die.
Response: Comment acknowledged.	
Bowen, Beverly	It's time you stop destroying the planet for the love of money. LET US HAVE THE ALTERNATIVE ENERGY THAT HAS BEEN AVAILABLE FOR SOOOO LONG.
Response: Comment acknowledged.	
Boynton, Elizabeth	Please protect our communities from fossil fuels so that future generations can also enjoy the beauty we now enjoy.
Response: Comment acknowledged.	
Bradford, Jennifer	We need to stop sacrificing our environment for the almighty dollar.
Response: Comment acknowledged.	
Brandt, Michael	No more oil in Grays Harbor. Take a stand against pollution and dirty energy and for clean energy.
Response: Comment acknowledged.	
Briere, James	Do you work for the Koch Brothers or The American People? Well !!!
Response: Comment acknowledged.	
Bright, Mary	Protecting a preserving the environment is very important to me.
Response: Comment acknowledged.	
Brophy, Michele	Enough is Enough.
Response: Comment acknowledged.	
Brown, Barbara	The earth is fast approaching a tipping point from the devastation wrought by man's activities over only a few centuries! Please put a stop to further damage to the north west and ensure that local people are not disadvantaged now and into the future by the influence of powerful and rich companies who do not have to account for their behaviours.
Response: Comment acknowledged.	
Brown, Bonnie Jean	We lived in Grays Harbor for eight years and deeply l o v e d it and it's communities, lands, and spectacular wildlife. Please PROTECT IT!!!! You have our sincerest THANKS!
Response: Comment acknowledged.	
Brown, Dick	"Light tomorrow with today!" ---Elizabeth Barrett Browning
Response: Comment acknowledged.	

Commenter Name	Comment
Brown, Ian	The great thing about renewable is that, once it is installed, there is no need to use fuel for its transport.
Response: Comment acknowledged.	
Burns, Kathryn	That is what we all need to be doing: moving toward clean, renewable energy sources instead of ones that pollute and will eventually run out.
Response: Comment acknowledged.	
Buttles, Kathryn	Stop the total disregard for our planet and the climate change oil and gas have put upon us. I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals NOW - not after oil spills. Thank you for reading this, but more importantly, for acting upon it.
Response: Comment acknowledged.	
Butts, Franklyn	if you cannot see your way to reject this please make sure that it is very costly for them and that the money is in reserve to clean up the mess when they decide to just quit and walk away.
Response: Comment acknowledged.	
Carmean, Ingrid	I plan to move back to Washington state in a year. I am moving there because of the cleaner and greener environment. Please keep it that way and reject these proposed terminals.
Response: Comment acknowledged.	
Caro, John	I plan to move to Grays Harbor in my retirement someday There is no "Risk Management" in the findings in the DEISs for Westway and Imperium oil terminal proposals. Please don't let this happen.
Response: Comment acknowledged.	
Carrington, Denise	Please do not allow investment in the polluting past at the very point in time when even the oil companies recognise that oil use must go down. (see the BP chief economist speech this week). Allowing this terminal will create a major stranded asset, as it is not needed and will not be used to any great extent.
Response: Comment acknowledged.	
Carroll, Linda	As a native of Washington State who values its environment, I am concerned
Response: Comment acknowledged.	
Carroll, Dr. Linda	As a native of Washington who lives in Louisiana where the Deep Water Horizon gusher occurred and who will soon be returning home, I am very aware and concerned
Response: Comment acknowledged.	
Casey, Cynthia	Living in the Northeast corridor, I'm well aware of the horrors of rail accidents. Several people have died in the past few years as trains have derailed, hit cars, etc. These accidents are unfortunate and probably preventable. Similar accidents with trains that transport crude would have additional damaging consequences. Why not learn from our mistakes on the east coast? Others' mistakes elsewhere?
Response: Comment acknowledged.	
Castilleja, Rebecca	We cannot allow the health and safety and quality of life of our communities to be put at risk by dirty 19th century fossil fuel projects which only will benefit a few for the short term and be to the long term detriment of the communities affected.
Response: Comment acknowledged.	
Cheng, Anne	Please prevent any environmental damages and reject the proposed Westway and Imperium oil terminals!
Response: Comment acknowledged.	
Chludzinski, Rose	Humans have destroyed too much habitat & wildlife this destruction and untimely deaths of our wildlife is unacceptable and must stop.
Response: Comment acknowledged.	
Christ, Starte	You waste all kinds of time trying to DEFEAT GOD. It simply CANNOT BE DONE. And all the while you keep yourself little. Wise up my light skin brothers. The little game that never was is finally over. Time to join the Great Crusade toward peace and happiness or STAY MISERABLE for 1000s more years.

Commenter Name	Comment
Response: Comment acknowledged.	
Christiano, Jennifer	You may find it strange that a resident of Idaho would write to you about oil terminals in your city, but I am concerned about the interconnectedness of the Northwest biomes.
Response: Comment acknowledged.	
Cicchi, Carla	No oil train transports anywhere in this world. It has proven to be too dangerous whether transported by train, ship, planes, etc., all are unsafe ways to transport oil. We have clean energies available and should use those and not oil or gas.
Response: Comment acknowledged.	
Clark, Barbara	WE MUST ALL WORK TOWARDS ACCELERATING THIS BEHAVIOR IF WE EXPECT TO LEAVE A WORLD FOR OUR CHILDREN WHERE THEY CAN FIND CLEAN AIR, CLEAN WATER AND ADEQUATE FOOD!
Response: Comment acknowledged.	
Coe, Skye	YOU ARE IN A POSITION TO USE YOUR ELECTED RESPONSIBILITY AND GOD GIVEN RIGHTS TO END THE POTENTIAL FOR DAMAGE TO OUR BEAUTIFUL ENVIRONMENT. HAVING LIVED ON THE PACIFIC NORTHWEST COAST I AM INTIMATELY AWARE OF HOW ANY DAMAGE WILL IMPACT THE LIVES OF FISHERMEN AND THEIR FAMILIES AS WELL AS ALL WHO LIVE THERE INTO THE FUTURE INFINITUM. PLEASE USE THAT RESPONSIBILITY WISELY AND CHOOSE THE HIGHER MORAL ROAD AS OPPOSED TO THE SHORTER TERM CHASE FOR THE BUCK!
Response: Comment acknowledged.	
Combes, Joan	We have alreqdy seen spills that have killed thousands of animal and bird lives. Nothing ever changes - no effective procedures exist that can prevent this loss.Increased tanker traffic is also increasingly killing our largest mammals, the whales, the noise of their engines and sonar confusing their own mechanisms. It must cease until alternatives are implemented.
Response: Comment acknowledged.	
Cook, Susan	I lived in this area in WA state for 20 years. It is earthquake prone and flood prone. It certainly is not an appropriate place for an oil terminal.
Response: Refer to the Master Responses for Seismic Risk and Design Requirements and Earthquake Probabilities.	
Cothern, Kristin	The academic honor society of Engineers,Tau Beta Pi, recently published a highly detailed article questioning whether the safety petroleum pipelines is a "pipe dream". This article points out that at the same time oil companies are proposing new pipelines that TRIPLE the current amounts, they are also using safety statistics designed to understate the risk of safety failures. In the past we were told we needed to sacrifice on human safety and environmental health for the sake of national energy security. This (debatable) societal benefit has been abandoned because now the oil companies are excited that they could triple production using new extreme and expensive extraction methods (tar sands, fracking). By externalizing massive risks to human health and the environment irreparably caused by these methods, they stand to reap profits, not from securing our energy needs but by selling oil to other countries. The infrastructure to export oil is the floodgate that would allow oil extraction to move to massive growth in extreme oil methods The TPB article detailed how material from these extreme methods is more dangerous to transport than previous oil and gas material. Already an unacceptable safety risks to communities, the infrastructure for the rail and pipelines is also the key floodgate holding back the power of oil companies over our government. With this infrastructure in place, there will be massive pressure to allow US oil exports despite growing risk and pollution from extreme oil extraction methods.
Response: Comment acknowledged.	
Cotton, Christine	It's time our country....and the whole world, start producing energy in more clean ways and stop digging up and destroying our planet.
Response: Comment acknowledged.	
Courtsal, Lyle	PS ALL FACILITIES SHOULD BE BUILT TO WITHSTAND A 9 ON THE RICHTER!!
Response: Comment acknowledged.	
Critser, Jackie	As a constituent that is proud to live in the clean, green Northwest, I am deeply concerned that Gray's Harbor is considering allowing oil by rail to transport through your community and to the Harbor. The NW is one of the top fishing areas in the world and anywhere oil and water come into

Commenter Name	Comment
	proximity, there's an extremely high risk of the toxic compromise of the waterway. Whatever spills, explosions, leaks, air, water, or soil pollution or health problems that come as a result of the oil being transported through the Gray's Harbor area becomes the same kind of troubles endured by other areas where these accidents have occurred and they have occurred all over the country with troubling frequency. This usually means that there is an immediate and urgent response by the community, some adjunct help is supplied, and some cleanup is done, but that the community still bears the brunt of the initial response and then has to go to court to see if their damages can be covered. In other words, the community will be paying for much of the cost of an accident financially and physically. Even after five years, there is substantial recovery to be done in the Gulf of Mexico and there are still die-offs in key species, tar balls washing up on shore, and oil coating stratagem in the bottom of the bay. The spill is not cleaned, it is relocated. In Alaska, where the Exxon spill washed ashore, there are still genetic abnormalities in some of the affected areas.Then there remains the issue of climate change, which the processing of tar sands, far more toxic and volatile, than regular crude oil will worsen. So essentially, you would be selling out the Bay for oil that would neither benefit Americans, nor the world climate.
Response: Comment acknowledged.	
Cross, Mary	Why in the world would we - here in the great State of Washington - want to risk our beautiful, relatively clean environment so that Big Oil can process and sell oil overseas? And for what? We take all the risk for very few jobs - and that risk may well be catastrophic! Let's face it, building more, big infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor.
Response: Comment acknowledged.	
Dahl, Stephen	Oil moves the world backwards. Burning it puts our children's dreams of a good life, and the words of the Declaration of Independence ensuring them life, liberty, and the pursuit of happiness, up in smoke. It makes ashes of the Constitution, the general welfare, and the blessings of liberty to our posterity. What we need is a liberation from the tyranny of oil and the fools who own it and our political process. The only way any energy excepting wind, water, and solar moves us forward, is over the climate cliff. That is what fossil fuels do to Creation, or millions of years of evolution, or both; they destroy. I lived in beautiful Washington State for twelve years. Here are the words of the Friends of the Earth:
Response: Comment acknowledged.	
Dahlgren, PhD, Shelley D.	The fossil fuel era is coming to an end. Let's not build up substantial infrastructure at a time like this. SDD
Response: Comment acknowledged.	
Daversa, Frank	Reject them because it is the right thing to do.
Response: Comment acknowledged.	
Davis, Sherry	I support protection of Grays Harbor and its people.
Response: Comment acknowledged.	
DeMarco, Jeni	NO MORE EXPANSION OF FOSSIL FUEL INFRASTRUCTURE - KEEP IT IN THE GROUND!
Response: Comment acknowledged.	
D, H	Haven't oil compnies poisoned too much of our land ,air and water already?? enough is enough KEEP OIL OUT of OUR forests PERMANENTLY.
Response: Comment acknowledged.	
Ditore, Steve	Let's just begin by stating that I DON'T WANT TO HEAR A BUNCH OF CRAP about how "trade is so desperately vital to this area" and BLAH BLAH. There are issues MORE VALUABLE than money, particularly when most of the money involved goes into so few pockets, but the damages are paid for by the rest of us.
Response: Comment acknowledged.	
D, Jamie	Personal Message: I fully agree with the points below describing the dangers of oil trains and facilities, and request you protect the region by disallowing proposed oil terminals. Thank you.
Response: Comment acknowledged.	

Commenter Name	Comment
Donaldson, Jamie K	I lived in Canada when the disastrous oil train derailment happened with the high loss of lives and damage to property. We were all shocked that something like this could happen. Now back home in Washington State, I wish to express my extreme concern that a similar scenario will play out here.
Response: Comment acknowledged.	
Donier, Jeremiah	Crude oil terminal is Grays Harbor is a BAD idea! If just one spill happens we'll need to rename the area Black Harbor. As a Washington State Native, I support protection of Grays Harbor and its people
Response: Comment acknowledged.	
Douglas, Jayne	Washington Department of Ecology WA POISON!
Response: Comment acknowledged.	
Douglass, Andronetta	POISON!
Response: Comment acknowledged.	
Druffel, Pauline	I'm aware of these impacts as they affect Grays Harbor communities, but also as they affect all of us who live near the train tracks carrying the oil to Grays Harbor. I can see the trains as they go across a high bridge leaving Spokane going west. I live in the impact zone if a train would derail on that bridge or either side of it. A train did, in fact, derail crossing that bridge in the 1990's and a rail car fell onto the freeway just below the bridge. I'm also aware that many more people in Spokane are in the impact zone. Two major hospitals serving not just Spokane, but the whole Inland Empire are in that zone, as is a large public high school which has over 2,000 students. There is no way to mitigate the damage caused by such a derailment and subsequent explosion. As we have seen in past experiences of these oil train explosions, the cities affected didn't/couldn't have adequate resources to contain these fires. Even though we are now more aware of the possibilities of such accidents, the resulting fires are too overwhelming for our fire departments
Response: Refer to the Master Response for Emergency Response and Planning Gaps.	
Duncan, Barbara	Before the petitioners' comments, here are my own: I live in Alberta. We rely on oil revenue. We should diversify. I hate the tar sands. Please discourage further tar sands development by protecting your own ecosystem!
Response: Comment acknowledged.	
Dwinell, Danny	Ignore the findings and stuff your bank account. Your kids and grandkids will love more toxins in their food, water, and air. Toxic mutant humans is a better life for all; better to rule in a Toxic Hell than to serve and thrive on a peaceful healthy Eden/Earth.
Response: Comment acknowledged.	
E, B	Can you spell G R E E D you toothless psuedo ecologists?
Response: Comment acknowledged.	
Edgar, David	The expansion of fossil fule infrastructure only builds a bleak future for all of us. Abandon furthur development of the systems for a fossil fule supported future in favor of new capital investments for sustainable energy implimentation.
Response: Comment acknowledged.	
Edwards, Daniel	This seems like bad timing to be talking about making more dirtier oil available when it isn't needed. I want the oil and coal use to slow way down. To bring this product to the Pacific Northwest is just crazy.
Response: Comment acknowledged.	
Ehrhardt, Carole	It is time, actually past time, to stop the pollution caused by the transport of BIG OIL. Oil spills happen too often and we can use renewable fuels and leave this oil in the ground.
Response: Comment acknowledged.	
Eldridge, Sara	Protect Grays Harbor and its people. Reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Ellis, J A	Skip the oil; use alternative, renewable energy instead. Spare the fragile environment of Grays Harbor. Ultimately, it's a much better plan economically, too.

Commenter Name	Comment
Response: Comment acknowledged.	
Ellison, Mike	As a Washington citizen and environmental scientist my judgement is that there is simply too much risk and too little reward from these proposals
Response: Comment acknowledged.	
Etter, Eleanor	There's just not a good enough reason to take the risks associated with the Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Fairless, Caroline	Grays Harbor??? Never
Response: Comment acknowledged.	
Fichter, Sarah	I'm writing to you as someone who is concerned about our continued reliance on fossil fuels, and about the costs the extraction and transport of these materials, which only worsen our dangerous climate situation, are imposing on the people and lands of this nation.
Response: Comment acknowledged.	
Fiegel, Deborah	Listen to the Pope, protect our environment. Do the right thing, please!!!!
Response: Comment acknowledged.	
Filipelli, PhD, Deborah	The following represents my position in strong opposition to the proposed Westway and Imperium oil terminals at Grays Harbor.
Response: Comment acknowledged.	
Finnie, Chris	I have lots of friends who live in the Puget Sound area. I've thought about moving there myself. So I've visited a lot. I met some sisters from Vancouver, BC when we were all visiting Hawaii. They told me there's a similar proposal for their area and the locals are up in arms for the same reasons. They've already seen the damage done to First Nations areas by extremely toxic tar sands extraction and transport. In the U.S., we've already seen the exploding trains filled with highly flammable Bakken crude. I spent Monday on a tour of the Monterey Bay National Marine Sanctuary. It's just amazing. I've lived in Oregon and loved the coast there too. I know what an incredible resource the West Coast of the U.S. is. So, like the folks in Vancouver, we don't want these terminals anywhere near our coastal waters. And certainly not in the stunning and wildlife-rich Puget Sound. Too many people depend on these fisheries, including local native tribes--whole way of life has already been threatened way too much.
Response: Comment acknowledged.	
Fisher, Helen M	We have the technology to recycle plastic and styrofoam back into oil...why aren't we doing that instead of destroying our environment? Is Big Oil that insane?
Response: Comment acknowledged.	
Forte, Sylvia	Must we spoil all of nature?
Response: Comment acknowledged.	
Foster, Beverly	DO NOT allow this to happen. We have destroyed so much of the earth in a very short time. Time is way past to put an end to these dangerous and UNNECESSARY practices.
Response: Comment acknowledged.	
Frazin, Richard	Please protect the environment from oil spills and other hazards!
Response: Comment acknowledged.	
Freeman, Dan	Why in the world should The People be expected to accept this idea of "beating a dead horse" and then be expected to pony up for tax subsidies to support said "dead horse" and when the horse makes a mess be expected to pay for the clean up ALSO? I can't be the only one that thinks this is idiotic.
Response: Comment acknowledged.	
Freeman, Richard	AS WITH THE PROPOSED TESORO FACILITY ON THE COLUMBIA RIVER, both of these projects will likely bring more devastation to our water and air.
Response: Comment acknowledged.	

Commenter Name	Comment
Fry, Edward	Without the environment, without life, our human created economy cannot exist! Life and it's vast diversity are a far greater priority to our species survival then human economics, GREED and convenience! It is long past time to protect life's diversity - which allows for human existence - at all cost. I would hope for you to become the solution, not the problem! Start thinking of the long term survival of life on this incredible creation.
Response: Comment acknowledged.	
Funes, Gabriel	My only personal comment is that it would be much more cost-effective to invest in renewable energies than to deal with the costs of the environmental and economic devastation from the environmental disaster(s) that WILL (statistically) come from expanding the oil industry this way. Does nobody take into account the oil industry's track record??? Anyway, thank you for your time, here is the automated petition letter:
Response: Comment acknowledged.	
Gehlert, Edgar	This fossil fuel must remain in the ground a EARTH is at the tipping point of aborting huamns and species in huge numbers.
Response: Comment acknowledged.	
Geiger, Marcia	Stop, before you kill the Earth.
Response: Comment acknowledged.	
Genevy, Julia	We all want to be healthy. For that reason, we want to breathe clean air, to see beautiful flowers and greenery. We turn to nature for this, just as a sunflower turns to the sun. We must recognize that any action negating this inclination is a terrible mistake. No one is denying that science has improved our lives. But we need to match the progress of science with progress in our commitment to preserve and protect our environment. Less than 20 years ago, an astounding 1 billion monarchs migrated to Mexico for the winter. Last year, a mere fraction of that -- just 33.5 million -- made the journey. Today have less than 1/10th the number of elephants that we had in the world only 100 years ago. We need a balance. Life is a chain. All things are related. When any link is disturbed, the other links will be affected. We should think of the environment as our mother -- Mother Soil, Mother Sea, Mother Earth. There is no crime worse than harming one's mother. Our planet can be renewed or ravaged. Now is the time to awaken and take action. Everyone is needed. The prophesied changes are going to happen, but our attitude and actions determine how harsh or mild they are. We need to act, to make changes, and to elect people to represent us who understand and who will take political action to respect the Earth. By the same token, one who loves nature can cherish other human beings, value peace and possess a richness of character unfettered by selfish calculations of personal gain and loss. A Kenyan saying goes that we should treat the Earth well; it is not a gift from our parents but a loan from our children. ANIMALS AND ENVIRONMENT HAVE NO DEFENSE AGAINST HUMANS? WILL IMPOSED UPON THEM. We abuse land because we regard it as a commodity belonging to us. When we see land as a community to which we belong, we may begin to use it with love and respect. Aldo Leopold
Response: Comment acknowledged.	
Grabenhofer, Frances	Climate change threatens the world yet inexplicably most governmental bureaucracies continue to act as if they are in denial.
Response: Comment acknowledged.	
Graffagnino, Mary Ann and Frank	PLEASE TAKE THE RIGHT, FAIR, JUST, HUMANE AND HEALTHY ACTION AND PROTECT GRAYS HARBOR.
Response: Comment acknowledged.	
Granlund, Scott	I am absolutely against this terminal. It would bring nothing but harm to Grays Harbor. The following statements speak well for my position on this matter.
Response: Comment acknowledged.	
Gregory, Dwight	I, my 2 siblings and 8 cousins are the third generation born and raised in Olympia, WA, so I have a special desire in keeping the NW, (God's Country) pristine for our children and grandchildren. As a child, my family spent many vacations along the coast up and down from Hoquiam and Aberdeen. I vividly remember the pulp mill smells that greeted us upon our arrival and would hate to arrive in

Commenter Name	Comment
	the future to the view and pollution generated by the proposed terminals. Please seriously consider the long term environmental impacts locally and regionally and reject the proposed terminals.
Response: Comment acknowledged.	
Gremban, Ronald	At a time when climate change is an existential threat to our whole civilization, we need to move aggressively toward non-fossil fuels, not expand oil infrastructure!
Response: Comment acknowledged.	
Grunbaum, Arthur	The risks cannot be mitigated and the permits must be denied.
Response: Comment acknowledged.	
Guevara, Pedro Anillo	Protect our Sacred Mother Earth above all else! That means NO to fossil fuels/ big oil/corporate amerika!!!!!!!!!!!!!!!!!!!!!!!!
Response: Comment acknowledged.	
Haener, Barbara	Good planets and unspoiled natural beauty are hard to find. The oil terminal plan risks too much so is a really bad idea for the people who live at Gray's Harbor, the wildlife there, and the environment.
Response: Comment acknowledged.	
Hall, Jerilyn and David	Please have a conscience--Protect our environment.
Response: Comment acknowledged.	
Hand, Thomas	I no longer own or operate a motor vehicle. I walk or use public transportation exclusively. I am already standing up to Big Oil. What will you do?
Response: Comment acknowledged.	
Hanna-Myrick, Chuck	I AN DIVESTING MYSELF OF OIL AND COAL STOCKS. I HAVE PUT PHOTOVOLTAIC PANELS ON OUR HOUSE, AND DRIVE AN ALL ELECTRIC (SOLAR POWERED) LEAF.
Response: Comment acknowledged.	
Hanson, Arthur	We MUST keep climate-changing fossil fuels in the ground!
Response: Comment acknowledged.	
Hanson, Craig	was, but I was here before the oil trains started. I live between two major rail corridors that are now both hauling hundred car unit trains of crude oil. Some are in the older style unprotected tank cars. I am a railfan, so I do not dislike trains. I realize they are a very important part of our way of life, and our economy. I even have stock in the railroads. I don't however agree with our increased use of fossil fuels, and worst of all, the shipping of it out of our country, when we are buying it from foreign countries. That makes zero sense to me.
Response: Comment acknowledged.	
Hanson, Natalie	We MUST keep climate-changing fossil fuels in the ground!
Response: Comment acknowledged.	
Hartman, Peri	In the long run, tourism and sustainable industries will bring far more revenue to the Gray's Harbor area. Right now, it is imperative that you do everything possible to prevent build-out of new oil shipping facilities. Short term greed is a cost none of us can afford.
Response: Comment acknowledged.	
Harvey, Juley	Oil is soooo over.
Response: Comment acknowledged.	
Harvey, Stephanie	We own a home in Aberdeen & have done so for 13 years. We would NOT have bought here if these oil terminals were already in place- the stench, the environmental disaster waiting to happen, the filth in the atmosphere around them until then.....We realize that jobs are needed in this area, but not THESE kinds. Thankfully, carbon-based fuels like oil are becoming obsolete, for various reasons, but humans are loathe to change especially if it inconveniences them. Don't help prolong the agony of this dying energy source, though we know their suppliers & allies are very powerful & will stop at virtually nothing to keep themselves going even at the cost of the human race's health & future.
Response: Comment acknowledged.	

Commenter Name	Comment
Hassa, Linda	This project must be stopped. Thank you.
Response: Comment acknowledged.	
Hayes, Tom	There are alternatives
Response: Comment acknowledged.	
Heavern, Gordon	Is finding a less disturb-able area to build the port an option?
Response: Comment acknowledged.	
Heffron, Joshua	I'm Against the Oil Terminals!!!! No More Destruction!!!! Stop All The Corporate Greed!!!! Save the Planet Save the People and the Wildlife!!!!!!!! Enough isEnough!!!!!!!!!!!!!!
Response: Comment acknowledged.	
Hegedus, Barbara	IS THERE ANY SPACE ON EARTH WHERE WE CAN FIND PEACE AND FREEDOM FROM OIL FILTH AND DISRUPTION???
Response: Comment acknowledged.	
Heisler, Robert	We are tired of sustaining the ongoing destruction of our planet for the further profit of already obscenely rich and powerful mega-corps.
Response: Comment acknowledged.	
Helmon, Mary Fay	This should not be a rubber stamp. It must be thoroughly researched regarding environmental impact and effect on the residents of the communities, not only at the terminal, but along the way there.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Hermanns, David	And finally, when Big Oil was demanding the right to "frack" anywhere and everywhere the rationale was to secure America's energy independence. How does exporting oil and natural gas further that goal?
Response: Comment acknowledged.	
Hills, Jo	Think forward Comment acknowledged.not backwards. We need to invest in alternative clean energy, not oil. Focus on the future.
Response: Comment acknowledged.	
Hickley, Frances	We spend vacation dollars every summer visiting Washington state's coast. A friend owns a boat and the guys have an annual reunion/retreat and I have a close friend near Portland. So, we frequent the Washington coast. The clear waters and beautiful coast are always a treat, but they would not be with oil spills (even little drips that cause that nasty rainbow sheen) and industrial oil shipping and equipment. It reminds me of the oil spill earlier this year in Santa Barbara, CA. That was caused by a landlocked oil pipe! The pipe rusted and the oil flowed into a storm drain, and into the ocean. Transporting oil is risky and full of opportunity for accidents, that come at a huge cost.
Response: Comment acknowledged.	
Hirth, Carol	No more oil spills! They are dirty, dangerous and destructive.
Response: Comment acknowledged.	
Hites-Clabaugh, Lucinda	Solar and wind energy DO work!
Response: Comment acknowledged.	
Hodie, Jake	Global warming is real. And so we must do something NOW to help protect the Earth. We must be proactive as too much time has already passed and the threat is growing by the day. The animal kingdom is already suffering and what hurts them will also hurt us. The animal kingdom is a fragile thing, and we cannot and must not let global warming do any more damage to them. Our air is already suffering. The environment is already suffering. The waters are already suffering. Haven't we suffered enough?! CLEAN energy is the cure!!!!
Response: Comment acknowledged.	
Holder, Lehman	The beautiful and environmentally-conscious Pacific Northwest should never be a dumping ground for fossil fuels -- explosive and flammable Bakken crude oil and dirty coal.

Commenter Name	Comment
Response: Comment acknowledged.	
Holloway, Sandy	We are going Green and that's a fact. Reject these outdated notions of energy. W only have ONE planet and everyone must be on board to save it!!
Response: Comment acknowledged.	
Horowitz, Laura	There is no way to drill without significant risk.
Response: Comment acknowledged.	
Hugdahl, Shirley	this is a dying project on a dying planet. lets prolong our existence as long as we are able
Response: Comment acknowledged.	
Huggins, William L.	I write to you as someone deeply concerned about what the oil and gas industry is doing to our planet.
Response: Comment acknowledged.	
Hunkin, Therese	RE: UNACCEPTABLE RISKS FOR THE PACIFIC NORTHWEST
Response: Comment acknowledged.	
Hyer II, Robert	These are the last convulsions of a fossil fuel industry which just murdered more than one million Iraqis to steal their oil and call the dead children the terrorists. I am a real print journalist and Vietnam War veteran. Only Americans can bomb defenseless children for tax free corporate war profits and stealing oil and call the dead "Sand Negroes" the terrorists. Like all absence of American reasoning, the USA armed Saddam to murder Iranians from 81 to 88 by President Reagan but Americans are the dumbest people alive and most spiritually bankrupt, indeed, carpetbagging oil thieves who create a delusional facade to justify their mutated sense of normalcy, an absolute psychological mush. The American Petroleum Institute has been chemically bombing defenseless Iraqis for 12 years and it's soooo evil moronic Americans aren't allowed to see it, no moving pictures. When we do something good we get to fetch moving pictures of it. Have you seen one Iraqi Oil Rig? No, we're deranged. Stop this industry from gutting Earth like the skeletal remnants of a Thanksgiving turkey. I can tell you one thing Bubba Billy Bob Big Buck; you will get exactly what you have coming to you. Embrace it.
Response: Comment acknowledged.	
Hylan, Marcia	This is not the future we want!
Response: Comment acknowledged.	
Jacob, Mel	Rather than supporting the oil industry, you should focus on renewable energy energy facilities. Stop further destruction of our habitat.
Response: Comment acknowledged.	
Janzen, Gayle	Please don't allow the dirty energy industry to turn WA state into the largest dirty energy export hub in the country. There are way too many risks involved with more oil trains going through our neighborhoods as they congest traffic and possibly explode. Alternative energy is the future whether the oil and coal industries want to admit it or not. We value our clean air and water here in our beautiful state so the thought of it being turned into nothing more than a superhighway for the highly flammable Bakken and tar sands is really scary. And to make matters worse, exporting more and more oil to China will only exacerbate global warming. And having these terminals so close to our coastline will only increase the likelihood of oil spills in our fragile waters inhabited by our endangered orcas and salmon. Do you really want to risk pushing them even closer to extinction?? Why on earth would you even consider allowing these terminals to be built when the ONLY ones benefiting from them are the oil companies. Please, for the residents in WA state and the entire planet, do the right thing and reject these terminals.
Response: Comment acknowledged.	
Jeffries, T	The risks involved with transporting crude petroleum are too great, especially when the primary beneficiary would be Big Oil and no one or nothing else.
Response: Comment acknowledged.	

Commenter Name	Comment
Jenkins, Daniel	please, do not degrade our environment any more for the sake of profit. Transition to renewables now!!
Response: Comment acknowledged.	
Johnson, Colleen	There is no way an accident won't happen because of the increasing frequency of these trains. The railroad personnel aren't equipped or adequately trained for disaster. Please, let's just not do this. Let's move on from this for the sake of everyone. Thanks.
Response: Refer to the Master Response for Emergency Response and Planning Gaps Evaluation.	
Johnson, Ellen	These planned proposals are just TOO risky, and I don't believe that we should take such chances with our Earth. It's too precious.
Response: Comment acknowledged.	
Johnson, Kristy	I live near train tracks. They are dangerous ones. It takes 45 min to go just a few miles because they are had a toxic spill once before. It is not okay to with me that any of this is happening. I am also very familiar with Hoquiam. It used to be beautiful there. I would like to think it will stay that way.
Response: Comment acknowledged.	
Johnson, Sampson	Did you hear the popes so each and how it coexides with the bill of rights and also the constitution?
Response: Comment acknowledged.	
Jones, Jeffrey	The alarmingly awful safety record of oil trains means an explosive oil train derailment is a question of when, not if. Reject the proposed Westway and Imperium oil terminals. It's a no-brainer. Think about it.
Response: Comment acknowledged.	
Jones, Joan	Besides the fact that our country should be devoting everything we have in alternative energy and saving our planet from further damage as oil spills would cause, wherever they happen, there are many reasons to completely stop any further plans for a Westway and Imperium oil terminal.
Response: Comment acknowledged.	
Joy, Amber	We need to invest heavily and immediately in clean energy research and sources. Quit wasting time and energy on building more infrastructure for toxic energy.
Response: Comment acknowledged.	
Joy, Gilligan	Please discourage investing in oil and encourage investing in renewable energy sources.
Response: Comment acknowledged.	
Kamalie, Jason	THE CESSATION OF THE PROCUREMENT AND USE OF ALL DIRTY ENERGIES AND FOSSIL FUELS IS LONG OVERDUE, AS IS THE TRANSITION TO GREEN, CLEAN, RENEWABLE, SUSTAINABLE, ENERGY SOURCES, TECHNOLOGIES, AND DEVICES.
Response: Comment acknowledged.	
Kastel, Diane M.	Oil companies are trying to expand their Northwest operations, putting our communities in danger. The risks are huge: from explosions to oil spills, carbon pollution to climate disruption.
Response: Comment acknowledged.	
Katz, Barry	All this just so these oil giants can enlarge their profits. Havn't they done enough damage to public and environmental health?
Response: Comment acknowledged.	
Kauffman, LL	This area is far too important to risk oli terminals! Please slam the door hard on this awful proposal.
Response: Comment acknowledged.	
Keils, Mary	I realize that money talks, but the terminal companies report that 45 permanent jobs would be created at the proposed Imperium and Westway terminals, with 103 estimated jobs in rail and marine operations. Really doesn't sound all that impressive given the RISKS (namely another major oil spill or a train accident--which would be when not if) outlined in the DEISs. Have people forgotten the barge accident off Grays Harbor that was just in time for Christmas 1988? And make no mistake it would be citizens taking on those risks. No amount of company money would be able to make up for an accident that would devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters. We're talking about continuing to

Commenter Name	Comment
	jeopardize our tomorrows by using yesterday's energy models when we could choose to create lots of jobs to meet our energy needs. And if not now, when? When do we act on what we know to be true? The sad truth is we are gambling with companies who only want short-term profits. I realize that saying no to the fossil fuel industry isn't easy, by any means. But I'm praying that more and more communities will do just that so we can avoid becoming fossils a lot sooner. In support of the protection of Grays Harbor and its people, I urge you to make a long-term decision to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Keleti, Dr. Steven	We need to be encouraging the building of renewable energy infrastructure, and discouraging the building of nonrenewable energy infrastructure.
Response: Comment acknowledged.	
Kesich, John	We need to transition to clean, sustainable energy not continue our dependence on dirty, atiquated fossil fuels.
Response: Comment acknowledged.	
Khan, Yumkhaibam Burhanuddin	As I am a student of ecology and environmental science, I love the natural environment.
Response: Comment acknowledged.	
Klassen, David	Every report I read describing conditions in the Arctic makes it clear that our climate situation is dire. Instead of exporting and burning fossil fuels, we must stop using them immediately. The Arctic Methane Emergency Group (see their website at AMEG.ME) has calculated that as much as 1 to 10 trillion tons of methane currently sequestered on the Arctic sea bed will enter our atmosphere now that the ice cap has melted, possibly within 10 years. When this happens, the human race, and all oxygen breathing species, will go extinct. Please do not approve of building facilities that exacerbate this problem.
Response: Comment acknowledged.	
Klein, James	This remains a vexing problem primarily due to industry's ability to curry favor with elected officials. The corrupting influence of money in our political system is undermining our democratic traditions and discouraging Americans from voting and/or running for office. This ominous development may well end our experiment in representative democracy unless we alter this decades-long trend. For the sake of the republic, we must amend the US Constitution to state that corporations are not people (and do not have constitutional rights) and money is not speech (and thus can be regulated by state and/or federal campaign finance laws). Short of accomplishing this, no other reform of significance will be achieved. The moneyed interests will turn any reform to their benefit, often at the expense of the nation as a whole.
Response: Comment acknowledged.	
Knutsen, Capt. Leif	PERSONAL NOTE: It does not take a climate scientist or even a particularly bright bulb on the street to see that Capitalism, unrestrained by the requirements of Planetary life support systems, is guaranteed mutually assured destruction. When dollars are sacrosanct to Planetary life support systems, what other outcome can be expected? Socially enabled capitalism is clearly a failed paradigm. Help end tax funded pollution of the commons for starters. Our tax dollars are funding a Planetary ecocide future for the children of ALL species. War becomes perpetual when used as a rationale for peace, Norman Solomon. Peace becomes perpetual when used as a rationale for survival. Yours truly. Captain Leif Knutsen, ret.
Response: Comment acknowledged.	
Konter, Laura	It is almost 2016 and you're still advocating fossil fuels for automobiles, heating, etc. This concept is antiquated and devastating to our planet! Instead, put the oil mongers on notice!
Response: Comment acknowledged.	
La Barre, Joanne	Why are companies allowed to profit from ruining our environment? It appears the local population is not as important as the money which is made. Alternatives are available and much better for people and our environment.
Response: Comment acknowledged.	

Commenter Name	Comment
Laughlin, Trella	Don't we learn anything? OIL BURNS !
Response: Comment acknowledged.	
Lea, Nigel	We cannot afford any more BP style oil disasters or exploding oil trains, as happened in Quebec Canada.
Response: Comment acknowledged.	
Leben, Molly	I have visited your state several times, not only to embark from the Port of Seattle but also visit friends there. It is a beautiful place that cries out for protection of its environment.
Response: Comment acknowledged.	
Lee, Camryn	This is the time to reduce our impacts on climate change, it is NOT the time to increase impacts. This is INSANE, we do not want this in Oregon. Protect our precious natural heritage and stop destroying the only planet we have. Washington is beautiful, why let it be used and abused for financial gain. It is time to conserve nad protect, not exploit and abuse.
Response: Comment acknowledged.	
Lenk, Vivienne	On my first visit to Olympic State Park and other areas that share part of Washington's coastline, I thought there couldn't be a more beautiful, mysterious and wonderful place to be. It did not disappoint on the second visit and it is what urges me to comment today.
Response: Comment acknowledged.	
Lenzen, Patricia A	This project will bring pollution and I call it "dirty" money. Why? Because there will be degradation of the local environment and further on along the transpor route. THINK CLEAN ENERGY, PLEASE
Response: Comment acknowledged.	
Leon, Mary A	The time for fossil fuels should be coming to an end and the support of renewable energy (solar and wind) will be our future.
Response: Comment acknowledged.	
Levin, Matt	Let's face the truth: oil is outdated, in terms of cost per production, and danger to the world's enviornment--both natural and political.
Response: Comment acknowledged.	
Lewis, Jeanne	It really is a no-brainer if you value our environment. Do the right thing for the State of Washington and our country.
Response: Comment acknowledged.	
Lewis, Joyce	I waas born in Aberdeen & grew up in Grays Harbor. It has been a depressed area for many years & I know you will hear...jobs, jobs, jobs. But the jobs may be cleanup. Please do not let this happen!
Response: Comment acknowledged.	
Litt, Michael	And it is urgent that we transition away from fossil fuels as quickly as possible to avoid catastrophic global warming. already, we are seeing the effects of greenhouse gas pollution in creating more frequent and more intense conflagrations in our forests as well as drastically decreasing the mountain snowpack on which our agriculture and fisheries depend.
Response: Comment acknowledged.	
Lockwood, Hedvig	We, the people, don't want any oil terminals in Grays Harbor.
Response: Comment acknowledged.	
Losnegard, Kim	This is a really stupid idea! Our proximity to the rivers & the ocean that support a fragile eco-system and a severely decimated fishery due to encroachments of civilization means we must be vigilant with our remaining natural resources and halt an industry with a poor track record of protecting the environment.
Response: Comment acknowledged.	
Lovejoy, June	RENEWABLE, ENVIRONMENTALLY SAFE SOURCES OF ENERGY ARE OUR FUTURE AND WHAT'S BEST FOR OUR PLANET. OIL AND GAS MOVE US BACKWARD.
Response: Comment acknowledged.	

Commenter Name	Comment
Lundholm, Mark	Eventhough I live in Illinois I am a lover of Washington State and its beautiful environment. I would hate to see this despoiled by the fossil fuel industry.
Response: Comment acknowledged.	
Mackey, Melvin	The risks are huge: from explosions to oil spills, carbon pollution to climate disruption. Just say NO!
Response: Comment acknowledged.	
Maddigan, A	GOD IS Watching... Us ALL.
Response: Comment acknowledged.	
Magee, Roger	We must refocus on our future. Renewable energy is the future our children and their children will rely upon. Making fossil fuels more easily available does not enrich the future. I have built a super-insulated home with local materials and with solar energy produce more electricity than I use. I am a teacher of 34 years who has used my retirement funds to make the future better for my students. Please reject the urge to make money and pollution that will leave our children poorer and less healthy.
Response: Comment acknowledged.	
Magnifico, Alecia	I am deeply concerned about a new oil terminal in the Pacific Northwest. We have already seen major problems stemming from oil drilling and subsequent spills in several areas of the United States -- problems that have taken years to ameliorate. As such, I cannot support the Westway and Imperium proposals. If a spill were to occur, the damage to the environment (both wild and peopled) could be significant. Moreover, the price of oil is down while projects with renewables are on the rise. Is it worth it to risk so much land and so many people's livelihoods? I think no.
Response: Comment acknowledged.	
Maloney, Charlotte	I have visited the site of the Exxon Valdez spill and found that, despite publicity to the contrary, thick crude remains just under the surface of the sand or pebbles on shores. We need the opposite of this proposal- less dependence upon fossil fuels.
Response: Comment acknowledged.	
Martin, Kathleen	It's time to put the welfare of this planet before dollars. There is NO new planet when this one is hurt so bad it can't be fixed. It's time for humans to do what is RIGHT.
Response: Comment acknowledged.	
Martin, Richard	Enough already, of the Big Oil agenda in my country!
Response: Comment acknowledged.	
Massa, Alison	I was one of the writers of the Ecological Characterization of the Pacific Northwest Coastal Region, a massive undertaking of the US Fish and Wildlife Service in 1979. I know very well how valuable and how vulnerable the Gray's Harbor area is. The social, economic and environmental value of the ecological quality and services of the region were regarded as highly important to the nation nearly 40 years ago. I am sure that value has only increased and needs to respected and protected.
Response: Comment acknowledged.	
McIntosh, Virginia	Oil Companies are in a rush to remove as much oil from the earth when the US demand is the lowest it has been in a long time. Really they want to make as much money as they can, especially before more sustainable methods of energizing our country take off and compete with them. Don't give up safety, liveable streets, clean air and water to put more profits in their pockets.
Response: Comment acknowledged.	
McKee, Sarah	There they go again. These terminals are a terrible idea.
Response: Comment acknowledged.	
McVicker, Micah	We need to move away from fossil fuels as soon as possible.
Response: Comment acknowledged.	
Medley, Elizabeth	As frequent visitors to the Olympic National Park, my family is aware of the specialness of the coastal communities in the Grays Harbor area.
Response: Comment acknowledged.	
Mershon, Don	DON'T ALLOW/HELP BIG OIL DESTROY OUR NATURAL ENVIRONMENT!

Commenter Name	Comment
Response: Comment acknowledged.	
Micklin, Philip	I was born and grew up in Western Washington and fondly remember visits to the ocean and Grays Harbor. Please protect this natural treasure.
Response: Comment acknowledged.	
Miller, Howard	We MUST stop destroying our only home, earth, with these terrible fossil fuel projects !!! STOP this awful project !!! Protect our home, don't ruin it !!!
Response: Comment acknowledged.	
Miller, Julie A	I sincerely hope that each of you will think of the long term future of our state, our nation, and the only planet our children and grandchildren have to live on when making your decision about whether to turn Washington State and Gray's Harbor into a sluice for the dirtiest, most primitive fuels still being used. Think of how you will feel, if you vote to further this scheme, when rail cars filled with Bakken crude oil leave the tracks and set off a deadly wild fire in Eastern Washington; or even explode in a town, killing innocent people in their beds, as has happened in Canada.There are lots of people who can argue the economic arguments for and against this idea. I'm just asking you to do the right thing: please put conventional thinking and the voices of oil company lawyers and PR people on mute for a moment, and ask, in your own heart whether it is a practical and sensible idea to allow rail lines dragging cars full of flammable and explosive fossil fuels across our unspoiled state, so they can be pumped on to boats, and dispatched to be burned in many places that lack even basic environmental protection. There are better way to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet its energy needs and respond to global warming. Why should we undo the good done by those decisions by building more big infrastructure for yesterday?s energy in Grays Harbor, risking our local and global quality of life, for a few hundred jobs and tax revenue? Thank you so much for considering my thoughts on this matter of life and death for our children, and grandchildren. Please vote to protect Grays Harbor and its people by rejecting the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Minerovic, Constance	Do not succumb to the false promises of Big Oil!
Response: Comment acknowledged.	
Molho, Arthur	TO SAVE OUR PLANET, WE MUST FIRST KEEP THIS TERRIBLY DANGEROUS AND POLLUTING JUNK OIL IN THE GROUND!!
Response: Comment acknowledged.	
Monjaras, Victor	It will be wrong to distrub the environment with this project.
Response: Comment acknowledged.	
Moran, JJ	Washington would suffer from both water and land disasters that will surely come given the dismal safety record of the industry. I have family in Washington, I and my sons and their friends have visited numerous times. Please protect this asset. This project is totally going the wrong direction. Please reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Morgan, Joanna	RESULTS OF THE OIL INDUSTRY: DROUGHTS & FLOODS EXTREMELY HIGH TEMPERATURES REDUCED RESOURCES FOR DRINKING WATER. WARMING SEAS & WATER POLLUTION RESULTING IN MARINE ANIMALS DYING OFF AFFECTING FOOD SOURCES AND JOBS NEED I GO ON? THE OIL COMPANIES BOTTOM LINE IS PROFIT. OURS SHOULD BE SURVIVAL OF OUR FAMILIES, THEIR CHILDREN AND THE PLANET. MONEY CAN NOT BUY OUR SURVIVAL. INCREASED OIL PRODUCTION AND USE GUARANTEES DEATH AND DESTRUCTION OF OUR BASIC NEEDS. TODAY'S PROFITS FOR THE OIL INDUSTRY IS NOT WORTH THE DESTRUCTION OF OUR BASIC NEEDS. DON'T ALLOW YOURSELVES TO BE BOUGHT OFF.
Response: Comment acknowledged.	
Morgan, Nancy	As a 40-year resident of the Northwest, I am especially concerned with these proposals. However, it is not simply as a Puget Sound person that I write - it is also that I follow economic news and forecasts, as well as environmental issues, and it is NOT in the best interests of the American people from either of those vantage points.

Commenter Name	Comment
Response: Comment acknowledged.	
Morris, Steven	Did we NOT learn anything from the Valdez disaster and the continuing aftermath?
Response: Comment acknowledged.	
Moss, Diane	It is absurd and a highly dangerous objective to transport these volatile oils through the Grays Harbor area--what earthly reason is there to put the human population and the flora and fauna at such high risk? One spill and the life in the Harbor will be destroyed. Why don't you try finding an alternative to activities that can only end disastrously with irreparable harm to the environment and all of the life that thrives within it.
Response: Comment acknowledged.	
Mundy, Jaye Anna	By saying no to oil you are saying yes, the earth and the people of the earth are important.
Response: Comment acknowledged.	
Myer, Tim	The desperation of the oil companies to get the few remaining dregs of junk oil - regardless of the damage to the planet, land, animals, humans and air- must not be allowed to run ruthlessly over the Northwest. These companies have proven they CANNOT prevent oil spills, and pollution, and fight to avoid any level of clean-up. An oil clean-up still leaves the land and water heavily damaged for decades.....
Response: Comment acknowledged.	
Nagy, Karen	The risk is too great. We should not be expanding the transportation of oil but putting our efforts into safe, renewable energy sources. All it takes is one spill...
Response: Comment acknowledged.	
Naiman, Shoshanah	Accidents always happen when humans are involved in any way.
Response: Comment acknowledged.	
Naples, Jean Marie	Due to the significant public health and environmental risks associated with an oil-by-rail terminal in Grays Harbor, I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Neal, Robert	Stop this impending catastrophe that will result from these corporate Monsters whose greed has no conscience. Set an example by doing the right thing which is taking a stand to keep fossil fuels where they belong --- in the Ground!
Response: Comment acknowledged.	
Neall III, George M.	I am a retired mining engineer (P.E.,; B.S.; M.S.). I have traveled through or worked in every state in our country. Mines and energy production are critical to our economy, however, they must be conducted in an environmentally responsible manner that balances all of the risks against all of the benefits. Clean-up and remediation costs should be deposited in advance, rather than being paid after-the-fact by taxpayers. Sadly, this has seldom, if ever, been done. We need to stop destructive practices such as hydraulic fracturing (aka "fracking"), megamines and their waste disposal areas and transition to renewable energy sources.
Response: Comment acknowledged.	
Nelson, Brian	There are two fundamental problems with any oil terminal on the Washington coast. First, it moves us toward using more fossil fuel, not less, and speeds global climate change. And second, the risk of transporting dangerous petroleum through our communities and environment.
Response: Comment acknowledged.	
Nelson, Shirley	It is time to change from such destruction in communities.
Response: Comment acknowledged.	
Nichols, John	To protect the environment, you need to reject the Westway and Imperium oil terminal proposals.
Response: Comment acknowledged.	
Norr, Carolyn	I am worried about what projects like this mean for my 2 young kids. Please have courage to protect their future!

Commenter Name	Comment
Response: Comment acknowledged.	
O'Donald, Julie	STOP THIS PROPOSAL. WE HAVE FAR TOO MUCH TO LOSE. WE ARE A FAMILY OF FOUR WA RESIDENTS LIVING IN BRIER, WA. WE LOVE THE BEAUTY AND WILDLIFE WE'RE FORTUNATE TO HAVE CLOSE BY. PLEASE DON'T PUT THIS AT RISK!
Response: Comment acknowledged.	
Olson, Diane	"Exploitation of our communities by big oil has got to stop. Do those communities wish the frail terminal? Do their wishes play any part in the proposed oil terminals? I would guess not. they must not be built."
Response: Comment acknowledged.	
Padier, James	Dear petty criminals and destroyers of love and life: Consider this expansion merely a hastening of your own destruction. You and your complacent foolish ways will be the end of your entire society. Intentionally poisoning, not only your own contributors, but the very fabric of the natural world that allows you to have all of your made up nonsense such as societies. You intentionally destroy what provides you life, you poison, murder, and deceive those who pay your salary. You intentionally perpetrate a toxic monopoly to make more valueless pieces of paper that humans made up that carry no value. You are worse than sub human, you are ingrate monsters and fools. Reptiles who hate humans and want to destroy their world. There is no sense of humanity left in you pathetic criminals. The U.S. is the worst place in all of every existence, dimension, alternate reality and is ever worse than Bizzaro world of Superman fame, and they ate rocks as food! It is the worlds bain, the terror of all of life and it is because of braindead conceited old criminal scum such as yourselves. F you and F the U.S., it doesn't deserve to exist.
Response: Comment acknowledged.	
Palla, Paul	THE SCIENCE IS CLEAR ACROSS THE BOARD. ALL FOSSIL FUEL EXTRACTION, TRANSPORTATION AND USE MUST BE STOPPED ASAP. FOSSIL FUELS = DEATH!
Response: Comment acknowledged.	
Parsons, Pamela	Oil companies do not deserve to be rewarded with more opportunities to pollute. The industry does not operate responsibly.
Response: Comment acknowledged.	
Pedersen, Sven	Regardless of the harmful effects, it's currently illegal to export oil and people are hard at work to insure that it stays that way.
Response: Comment acknowledged.	
Penn, K	Before you tell me about all the jobs that this oil terminal will bring--the inevitable spills will destroy many more jobs when it ruins the fishing industry and coastal tourism. Be forward thinking, people! Do not let the greedy oil barons loot our beautiful Washington natural resources and leave us with the destroyed hull.
Response: Comment acknowledged.	
Petersen, Garrine	STOP ENDANGERING OUR LIVES WITH THE TRANSPORT OF THESE OILS.
Response: Comment acknowledged.	
Phillips, Thomas	In addition, the economics of these proposals are anything but sound. Between low prices, continual protests and reduced global demand, these projects are losers.
Response: Comment acknowledged.	
Pickell, Bobbie	My greatest wish is that my grandchildren's grandchildren, and yours, willl get to see God's wonderful earth as God intended it ot be seen. A further hope is that they can do this without the use of a gas mask.
Response: Comment acknowledged.	
Pikus, Barbara	Turning the Northwest into the Oil and Gas pipeline to Overseas markets is a hideous and odious plan. Boosting Oil and Gas Industry profits while risking everything in our Northwest environment, turning our rivers and coastlines into industrial zones, exposing countless small towns, cities, farm land, rivers, marine ecology, PEOPLE, to oil spills, train explosions, oil tanker traffic, air pollution, noise, etc, etc. for what purpose? To cause more Tar Sands extraction? To have an outlet for the

Commenter Name	Comment
	explosive Bakken oil, to move the FRACKED gas which has already destroyed ground water and is causing premature births in women living near the wells? And, then there is the EARTHQUAKE probability we are all hearing about. This plan is insane, insane, insane!
Response: Comment acknowledged.	
Platt, Sylvia	THIS WILL NOT BE A CURE FOR THE ECONOMIC ISSUES OF THE WEST END!!! IT'S THE WRONG THING TO DO AND YOU KNOW IT.
Response: Comment acknowledged.	
Poe, Ben	DONT BE A CONDUIT OF GLOBAL DESTRUCTION!
Response: Comment acknowledged.	
Poopypants, Professor	Could we please put a stop to all this seemingly endless instances of total cock suckery? What the fuck is it gonna take for dimwitted pobuckers such ass yourselves to take the light bulb out of your butt socket and put it in your mouth?
Response: Comment acknowledged.	
Powell, Tracy W	I also urge you to deny any similar projects in our state: Skagit, Whatcom, and Clark Counties need protection too.
Response: Comment acknowledged.	
Power, LaVerne	Our dependency on oil is DECREASING! Let's encourage that and realize that we don't need to keep despoiling our lovely state. No more oil expansion wanted or needed! Washington state should continue its record of encouraging alternative energy usage!
Response: Comment acknowledged.	
Pratt, Ted	support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals and just hope that I don't pour some fast drying concrete on the railroad tracks.
Response: Comment acknowledged.	
Price, Homer Edward	The fact that the oil will be exported is proof that it is not needed in this country. So we will take all the risks to provide oil to other countries, who will in turn burn it and add the the carbon dioxide that is causing global warming, drought, wildfires, rising sea levels, and storms in this country.
Response: Comment acknowledged.	
Price, Steve	America needs a plentiful supply of oil and gas. In spite of what the environmentalist wackos think, it will be many decades before so-called 'green' energy sources are plentiful enough to replace oil & gas. It will be even longer before they become economically viable. I urge you to ignore the wackos! Support the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Ramsey, Dale	Is this good governance? NO!
Response: Comment acknowledged.	
Raphael, H. David	We must demand that the volatile tar sands oil be processed to make it less toxic before it moves from its origin. This toxic waste must not be allowed to reach our beach's, rivers and air. We all know that burning fossil fuels is not needed to produce our energy needs it is just Profit over People and the Earth.
Response: Comment acknowledged.	
Ratliff, Joe	As a retired federal scientist and environmental specialist, I am very concerned about proposed projects involving the transportation of dangerous fossil fuels.
Response: Comment acknowledged.	
Reilly, Mary	I am beginning to think our governing faction in America have lost all concept of protecting our peoples health and land Almost everyday there is something new that is being made public about how our country is being allowed to be taken over by big Corporations for profit.
Response: Comment acknowledged.	
Revord, Michael	Time to let Big Gas and Oil know they can no longer dictate what happens in this country.

Commenter Name	Comment
Response: Comment acknowledged.	
Reynolds, Erika	Stop or I will provide evidence that you support solar and ethanol.... :O)
Response: Comment acknowledged.	
Ricci, Peggy	These oil companies are going to ruin all of our waterways and they are also doing a good job on ruining the earth they go over as nothing will grow on an oil spill.Think if they continue what this planet will be like!!!!
Response: Comment acknowledged.	
Richards, Emma	I really think you should reject the proposed Westway and Imperium oil terminals. It's just not worth the risk of an oil spill. Thank you.
Response: Comment acknowledged.	
Rivers, Susan	Expanding the access and availability of fossils fuels isn't in the best interest of our nation or the world. Short term gains will only yield long-term losses.
Response: Comment acknowledged.	
Roberson, Gracie	Please make your investments in clean, renewable energies rather than dirty, depleted fossil fuel energies.
Response: Comment acknowledged.	
Robert, Brett	We need to stop destroying our environment in the utilization of fossil fuels now! We need to be moving towards renewable fuels sooner than later anyway. Building these terminals will cause a lot of destruction in an already compromised environment. We would be crazy to exacerbate the issue any further for a fuel source that will run out sooner than most people would believe.
Response: Comment acknowledged.	
Robins, William	Courting disaster
Response: Comment acknowledged.	
Robinson, D	NO TRAINS OF MASS DESTRUCTION SHOULD BE ALLOWED IN OR NEAR OUR HOMES AND COMMUNITIES, PERIOD!
Response: Comment acknowledged.	
Rojeski, Mary	WOULD YOU WANT YOUR FAMILY NEAR THIS???
Response: Comment acknowledged.	
Rosenkoetter, Jerry	It is dangerous and unwise to think about exporting oil. Where are all the promises of energy independence.
Response: Comment acknowledged.	
Saied, Tammy	Please make Good, Logical Decisions that make the Right Impact on our Future!
Response: Comment acknowledged.	
Saint-Marie, Mary	A new paradigm is upon us all and it is arriving fast! It is fossil fuel-free. This proposed project is like keeping a dinosaur alive. The money from the people needs to be divested from tis type of project and be reinvested in the new and renewable clean energies. There is no stopping the direction of New Energies. Please be the leadership that moves us all, globally, in that direction. Please be the leadership that cares for the earth and for the purity of the soil, water, air. Please be the leadership that knows what to do. Purity or Pollution. Please be that leadership now. Now is the Time.
Response: Comment acknowledged.	
Savchenko, Aleksandr	Being seriously concerned about possible environmental impact of Westway and Imperium terminals, but not familiar with the details of the issue, I am forwarding you the message composed by the Friends of the Earth. Please, consider their comments very thoroughly and make the right decision.
Response: Comment acknowledged.	
Savlove, John	I live in the Northeast, however, my sister lives in West Seattle, and I am familiar with that part of the coast clear up to Denali. Moreover, the research I've done for years has been at variance with the business-asusual approach the oil industry takes - even after years of evidence confirming the aforesaid research. My research doesn't just include the poisonous byproducts of once mighty

Commenter Name	Comment
	energy infrastructures now decadent. It also integrates energy, emotional growth, and a revisionist sense of a holistic economy into the picture. Facts are facts. "Climate change" is as much cosmic as it is human industrial, but that doesn't change the fact that we need safer energy delivery systems. Industry needs to listen to the Pope (now in accordance with Native American ideas), not sentimentally, but to then apply sounder ideas to sounder strategies. A single major oil spill could devastate the area?s maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters. It's not a risk worth taking when there are whole new venues to explore instead. On all levels - applied science, technology, emotional, long-term, economic, and health. My best to all parties involved with these complex issues. Your expertise is very much appreciated.
Response: Comment acknowledged.	
Scarpinatto, Thomas	Oil companies have not demonstrated sufficient ability in remediation of tar sands spills.
Response: Comment acknowledged.	
Schmerling, Mark	Please, do NOT let our energy policy, or the Earth's energy policy, be dictated by barbaric individuals (corporate CEOs), who would leave a mess for their own children and grandchildren. Do you think they really care about the rest of is?
Response: Comment acknowledged.	
Scholl, Jackson	As a US citizen with family in western Washington State, I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Schultz, Lesley	It could even be permanent and not able to be cleaned up, ever.
Response: Comment acknowledged.	
Schumacher, John	As a 5th generation resident of Grays Harbor, I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Sellers, James	There is only reason to do this and that is to make someone RICHER. Stop this
Response: Comment acknowledged.	
Shelley, Kent	In these days of serious climate change danger we need to seriously change our ways regarding fossil fuels; to continue to use them at the expense of our own living environment is CLEARLY FOLLY.
Response: Comment acknowledged.	
Shue, James	The findings in the DEISs for Westway and Imperium oil terminal proposals show that the risks of oil spills are an acceptable risk. Accidents can be mitigated and the environmental damage could be resolved. There is some risk associated with the project and the reward from these proposals presents significant opportunities for Grays Harbor communities. Much of what makes Grays Harbor special would have little risk. The safety record of oil trains has improved with the new cars and communities along the rail line from Aberdeen to Chehalis should have safety plans in place to handle any event. Building more, big infrastructure for oil is the best path to meet today?s energy needs and a big economic boost for Grays Harbor. I feel confident about the protection of Grays Harbor and its people and urge you to accept and support the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Sickle, Krae Van	PLEASE SHUT DOWN THE IDEA OF TRANSPORTING OIL OUT OF WASHINGTON
Response: Comment acknowledged.	
Sides, Lee	Much of what makes Grays Harbor special would be put at risk. A single major oil spill could devastate the area?s maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters as we saw in the Gulf!
Response: Comment acknowledged.	
Simon, Jill	TOO RISKY! -from explosions to oil spills, carbon pollution to climate disruption...
Response: Comment acknowledged.	

Commenter Name	Comment
Simone, Dorothea	As a Registered Nurse who understands the dangers to our heart and lungs this transport brings, I want you to find Clean Energy solutions instead. The spills are a real danger. Has the Red Cross or any group been on alert here? How will the earthquakes effect these dangerous trains?
Response: Comment acknowledged.	
Sims, Layne	Drastic improvement of safety measures are needed before this proposal can go forward. Too many accidents have occurred without major, if any, consequence. While I do support President Obama's "all-of-the-above" strategy, which would include shipment of oil-by-rail, I support protection of Grays Harbor and its people. So, I urge you to reject the proposed Westway and Imperium oil terminals until proper safety measures have been updated and implemented.
Response: Comment acknowledged.	
Slattery, Marie	We need to find a better way to live.
Response: Comment acknowledged.	
Smarr, Janet	We should be turning ourselves and world away from carbon fuels, not encouraging their production and export. We need to stop making the public bear the costs for risky and dangerous private profits. I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals. Thank you for your attention and concern.
Response: Comment acknowledged.	
Smedberg, Virginia	Please reject the proposed Westway and Imperium oil terminals in Grays Harbor. We humans have already damaged too much of this lifeboat Earth in our greedy use of this NON-renewable resource (which we are stealing from our future generations who might need the few applications for which petroleum is the ONLY option). Using oil and its derivatives for energy fuel is like burning $1000 bills! And we have not found a way to extract it without major damage to this Earth.
Response: Comment acknowledged.	
Smith, Courtenay	Your job is to protect our state from stupid and dangerous activities such as this. All the job promises in the world do not excuse the rape of our environment to enrich the few.
Response: Comment acknowledged.	
Smith, Drew	We should just leave it all in the ground!
Response: Comment acknowledged.	
Smith, Glenn	We should heed the Pope's message and the myriad scientists that have made clear the need to eliminate continued dependence on fossil fuels. In that vein, new endeavors to extract fossil fuels should be abandoned, not faciliated.
Response: Comment acknowledged.	
Soares, James	GIVEN THE NUMBER AND FREQUENCY OF BOTH MASSIVE SPILLS AND MASSIVE EXPLOSIONS OF RAIL CARS MOVING THIS PRODUCT OVER JUST THE LAST TWO YEARS, THE IDEA OF EVEN CONSIDERING TO ALLOW TRANSPORT OF THOSE PRODUCTS NEXT TO PUGET SOUND AND IT'S FEEDING RIVERS IS FRIGHTENINGLY ABSURD; ONE ACCIDENT, AND OUR STATES LARGEST RESOURCE IS DESTROYED.
Response: Comment acknowledged.	
Sokol, Sigmund	The EPA and FERC should know ALL the facts pertaining to the whole Big Oil business in America. Apparently the EPA and FERC do not know ALL the facts, or they are being paid off to NOT know ALL the facts about Big Oil business. FERC must stop any and all delivery proposals such as the Cove Point Gas Export facility in Maryland and the Westway and Imperium oil terminals in Grays Harbor, WA., Why? The first problem is the high chance of a ship oil tanker either having a spilling accident at sea or running aground and spilling its oil due to the very rough nature of the northwest pacific waters.The second problem (and possibly the worst) is the fact that such oil terminal depots are always built ON THE CHEAP, and therefore are not built to withstand the effects of a large natural disaster such a tsunami, an earthquake, or a volcano. In the past few years we have been experiencing more than the usual amount of earthquakes, tsunamis, and volcanoes around the 'Pacific Rim of Fire'; and there seems to be no let up to these geological upheavals. Geologists are predicting that the Pacific west coast is now OVERDUE for the 'Big One', which would include populated areas such as Seattle, WA and Vancouver, BC and right on down to San Diego, CA. When (not if) a large geological disaster does happen affecting the Pacific west coast, the devastation on

Commenter Name	Comment
	the affected human and animal population and the ecosystem will be dangerously much greater than any normal prediction. Shell?s GREED for oil is like someone playing roulette with the forces of nature. And now ?shell oil? is determined to make sure their GREED is satisfied no matter how disastrous the consequences to the ecosystem, to human and animal life, and to OUR planet in general. When will the GREED stop?
Response: Refer to the Master Response for Earthquake Probabilities.	
Solis, Sergio Andres	The only ones truly benefiting from Big Oil are the few, greedy, rich. It is about time that we stand up to them - firmly! Furthermore, all the verses in the Holy Bible are against richness. Stand up for all the verses in the Holy Bible, the Word of God. God bless!
Response: Comment acknowledged.	
Spaulding, Stephen	When will our society take to heart what we already know is the truth: We must move away from fossil fuels NOW?
Response: Comment acknowledged.	
Spurling, Leslie	As a former resident of the greater Grays Harbor area, I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Stalnaker, Ward	Why destroy God's world for technology that will soon be medieval history?
Response: Comment acknowledged.	
Stanely, Cathea	Please do the right thing and reject this very dangerous idea . Thanks for saying no to big oil and don't think the people don't realize it's about the money and the power oil companies have.
Response: Comment acknowledged.	
Star, Star	stop slaughtering humans and the planet to enrich the super rich death-for-profit corpocracy!!!
Response: Comment acknowledged.	
Steen, Pam	The best solution is to terminate this plan and spend all monies on alternative fuels.
Response: Comment acknowledged.	
Stevens, Carolyn	Immediately: -- Make a public commitment to employ safer ways of shipment. -- Make a public commitment to redirect your focus to exploiting clean energy sources such as solar, wind, and minimum-impact water power. Commit to publishing monthly progress reports of how you are meeting your commitment.
Response: Comment acknowledged.	
Stone, Chris	It is obvious to all who do not have a direct financial interest in drilling for and producing more oil, that WE DON'T NEED TO CONTINUE TO DESTROY THE EARTH AND ALL ITS INHABITANTS TO PRODUCE A DAMAGING 20TH C PRODUCE, WHEN SOLAR, WIND AND WATER ARE READILY AVAILABLE.....
Response: Comment acknowledged.	
Sutriasa, Shakti	Allowing crude oil to be exported from Washington is a huge mistake. Not only are there massive potential environmental challenges, but it will do little to support the economy or people of Washington. My family recently bought home on the Puget Sound. This area needs to be mindfully overseen as it is one of Washington's most valued treasures.
Response: Comment acknowledged.	
Swanke, Schurkey	DO NOT ALLOW OIL EXPORTS.
Response: Comment acknowledged.	
Swanson, D	Big oil already receives billions of dollars in subsodies while making record incomes. Enough is enough!
Response: Comment acknowledged.	
Tabakin, Bonita	Friends and energy Batons, we don't even need oils, natural gas, not wind mills that annihilate birds' migrations. All we need is solar and the newest form of energy that when released into the air cleans our total environment: think even coral reefs. Don't know why no one has contacted me. Not the

Commenter Name	Comment
	Pope, not the Clintons , Not the Trumps. Not the energy emissions summit. What despair I feel can not be told in words.
Response: Comment acknowledged.	
Tanowitz, Wendy	Need I mention the disastrous impacts on our climate of the mining, transportation and burning of this fossil fuel? The Pacific Ocean has warmed to a dangerous level and Washington State is experiencing the worst drought in recorded history. The drought is so severe that a fire has been burning in the Queets rain forest since mid-May. ? When fire can eat a rainforest in a relatively cool climate, you know the Earth is beginning to burn. Washington's rivers and streams are now at record lows, fish are dying, and farmers and communities are facing water shortages. Officials call its scope and impact unprecedented in the modern history of Washington.
Response: Comment acknowledged.	
Tansill, Roy	Who benefits from this proposed train terminal? Obviously the fossil fuel folks receive the lion's share with the railroads grabbing a huge windfall as well but what do we get out of this? We get more pollution from new fracking and drilling, we get an unacceptable increase in the probability of carnage from oil train disasters, we see more and more money flowing into the fossil fuel coffers from which we receive near zero tax revenue- in short we get nothing good. We also encourage the fossil fuel folks to continue to rape our planet.
Response: Comment acknowledged.	
Tatom, Jeff	Washington and the Northwest don't want to become the Northeast! We have no interest in destroying the environment for short term gain of big corporations and the 1%! We don't want the spills and the exploding trains! Further, until US oil imports are zero, there is no need to be exporting any oil!
Response: Comment acknowledged.	
Thomas, Reynold	Greed should not trump environmental protection. Stop the madness now!
Response: Comment acknowledged.	
Thomas, Pat	Please protect our land, air and water and the people who live, work and love this land.
Response: Comment acknowledged.	
Tivol, David	Like many Californians, I may want to move to a nicer state some day - please don't Californicate the state of Washington!
Response: Comment acknowledged.	
Trask, David	THE TIME TO GET TO THE FUTURE IS NOW, AND IT CAN NOT BE ACCOMPLISHED WITH DIRTY CLIMATE RUINING AND ECOSYSTEM DEVATATING OIL.
Response: Comment acknowledged.	
Traweek, Jim	Fossil fuels are being replaced by more earthfriendly technologies. We all know how expensive and difficult remediation is. Taking the long view, we would be leaving a very problematic future for our loved ones to deal with, if the terminal building goes forward.
Response: Comment acknowledged.	
Tugwell, Kathleen	Big Oil is relentless, always seeking a way in or around obstacles put up by local, state, or federal governments. Please do not let their arguments and spurious justifications lead you to approve construction of oil terminals in Gray's Harbor. Use your power to stand tall for the environment and the people of Gray's Harbor.
Response: Comment acknowledged.	
Tupper, Allison	Transporting fossil fuels is as damaging to the environment as extracting and burning them. don't do it! Leave fossil fuels in the ground.
Response: Comment acknowledged.	
Tyrie, Elaine	I lived in Grays Harbor County for a number of years. The beauty and resources of the harbor area, the culture of fishing, the value of tribal lands and culture are too crucial to let crude oil transport and terminal be allowed.
Response: Comment acknowledged.	

Commenter Name	Comment
Urton, S	With all our know how and knowledge, we should be able to come up with better and safer ways to provide our energy needs. These companies mentioned above should look at the future and invest in non-polluting and environmentally sound methods of energy production, rather than continuing to their expand their energy products in order to cash in before other safer energy producing companies take over. By their processes they are endangering our environment and that of the people who live near these terminals.
Response: Comment acknowledged.	
Van Brocklin, Matthew	Our communities will suffer, not for the greater good of our nation, but for the profit margins of a very few. Those few, I might add, will live elsewhere and will not feel the affects of an accident or spill. The risks and costs to communities and the environment far out way the positive impact of these projects, at least for the majority of Americans.
Response: Comment acknowledged.	
Vavrek, Jean	Please put the community and environment of Grays Harbor above the profits of Big Oil.
Response: Comment acknowledged.	
Victor, Jacqueline	Do the right thing. Oil is passe, quit suppressing zero point energy technologies immediately. Thank-you
Response: Comment acknowledged.	
Volz, Candace	Have you seen recent photos of Prudhoe Bay? Instead of one of the world's largest tundras, it's now an industrial wasteland. And there's still oil being pumped, so the cleanup that should be taking place is very much the responsibility of the drilling companies. But no clean-up is happening. There are still "wild" animals at Prudhoe Bay- but now they eat out of dumpsters. Do you want Grays Harbor to look like Prudhoe Bay in 25 years? Because that's your reality if you let this terminal happen.
Response: Comment acknowledged.	
Walkins, Jami	Get smart and kick big oil out and find innovative ways to supply energy
Response: Comment acknowledged.	
Warner, Carole	Though I didn't compose the letter below this first paragraph, I have read it and am sending it to you because it's well written and says what I want to say to you! Please respect the environmental impact findings that clearly indicate this terminal is an environmental hazard that doesn't pass muster and must not be allowed to be built.
Response: Comment acknowledged.	
Watters, Diane	Please! It is utterly ridiculous to be doing anything...anything at all - that promotes or supports the burning/use of fossil fuels in the world today, given what we now know about the environmental destruction created. STOP IT!!
Response: Comment acknowledged.	
Weaver, Andrew	Your actions of today shall be judged by those of tomorrow....
Response: Comment acknowledged.	
Webster, Marybeth	By taking this one small but significant step, you are saving the planet for my newborn great grand daughter to enjoy.
Response: Comment acknowledged.	
Weg, Bill Vom	I HAVE WORKED IN THE OIL INDUSTRY AND I KNOW THAT THE STANDARDS CAN BE MADE STRONGER FOR THE COMMON GOOD. WE NEED TO LEVEL THE PLAYING FIELD FOR ALL DRILLING COMPANIES WITH BEST PRACTICES STANDARDS AND ALL OF US PAY THE PRICE FOR HIGHER STANDARDS TO PROTECT OUR ENVIRONMENT AND OUR HEALTH. EVEN WITH HIGHER STANDARDS WE CAN HAVE EVEN LOWER ENERGY PRICES THAN WHAT WE HAVE NOW AND THE OIL COMPANIES WILL NOT BE FORCED OUT OF BUSINESS. THE POWERS THAT BE OWNERS OF THE MEANS OF PRODUCTION WORLDWIDE DO NOT UNDERSTAND THAT POLLUTION OF THE ENVIRONMENT IS NOT GOOD AND THAT THEY SHOULD SHARE IN THE CHANGES IN MANUFACTURING AND THE COST OF REMEDIATION OF THE POLLUTION THAT IS IN OUR ENVIRONMENT NOW. THE POWERS THAT BE FOUGHT THE SUPER FUND AND ACTUALLY EVERY TIME POSSIBLE CONTINUE TO GET DISPENSATIONS FOR CONTINUED POLLUTION. (LOOK AT

Commenter Name	Comment
	CHINA?S EXPERIENCE WITH ENVIRONMENTAL POLLUTION RIGHT NOW. THE POWERS THAT BE HELPED SELL THAT IDEA. NOW THE CHINESE PEOPLE ARE FORCED TO CHANGE. WWW.ONE6YEARTERMLIMITS.ORG
Response: Comment acknowledged.	
White, Faith	LET COMMON SENSE NOT BIG OIL GREED BE OUR GUIDE~
Response: Comment acknowledged.	
White, Jean	We have seen the problems that the transporting of oil fosters.
Response: Comment acknowledged.	
Wilber, Heather	We need to DECREASE our dependence on Big Oil and INCREASE our use of Cleaner, Alternative energy sources like Solar and wind!
Response: Comment acknowledged.	
Wilder, Dwain	Every week passes with some story indicating that we, as a global society and as an American society, are divesting from fossil fuel. It makes no sense to wreck our grandchildren's inheritance for a few more years of oil and gas.
Response: Comment acknowledged.	
Willet, Zoe	Plus it is way overdue to stop impacting negatively on the First Nations' populations.
Response: Comment acknowedged.	
Willard, Dennis	Renewables are how we should deal with the energy crisis. It was a fact thirty years ago that peak oil was on the horizon and this crisis was inevitable. We did nothing then and if the oil tycoons have their way we will continue with no action. Great legacy America!
Response: Comment acknowledged.	
Wodynski, Barbara	I live in Cheney, Washington, and the rail line on which oil trains travel is parallel to our main street, only about fifty yards away. An oil train disaster occurring in Cheney could literally destroy our town.
Response: Refer to Draft EIS Section 4.5, *Environmental Health Risks—Rail Transport*, for a description of potential risks that could result from the proposed action	
Woodruff, LK	The people get all of the intrusion and risk, the environment sustains serious, lasting damage - and the RRs & oil companies reap all of the profits. What's wrong with this picture???
Response: Comment acknowledged.	
Works, George	The nation and the world do not need more oil terminals. The world is awash in excess oil, and nearly all countries are pledging to reduce their use of fossil fuels.
Response: Comment acknowledged.	
Wright, Armin	What Grays Harbor, The state of Washington, and the people of the earth desperately need now is IMMEDIATE inhibition of fossil fuel marketing and burning. The state should be promoting development and expansion of renewable energies as a strong priority and should NOT exploit expansion of fossil fuel markets for their short-term economic benefits.
Response: Comment acknowledged.	
Wynn, Sheila	Grays Harbor for many of us is the gateway to the coast and to the beauty of the Pacific Ocean, oil terminals would ruin that and jeapordize our already imperalled sealife This is not what is best for Washington or it's communities.
Response: Comment acknowledged.	
Young, John	Here where my wife and I live, the south most tip of Texas (think South Padre Island), three LNG export operations targeting our local Port of Brownsville. Make sure the Grays Harbor folks don't get "railroaded" the way these companies and their backers are trying to railroad us.There was a FERC "Public" scoping meeting on the three 08-11-2015 in which the 3 companies were allowed to set up exhibits and talk up anyone showing up to make a comment. No public or panel discussion or Q&As or exhibits.We just discovered that a condensate processing, storage, export operation is breaking ground at our Port. Was there any public notification inviting public comments. We're still trying to find out.What was the permitting process? We're still trying to find out. If our oil embargo is overturned, then for sure we'll get oil exporting at our port as well.All this stuff is getting "railroaded" in over local objections. What if we're not comfortable with what's allowed under this

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	or that permit requirement, requirements that have been watered down and crippled by industry lobbying and legal action (our state, Texas, weighing in on their side)? For example, the EPA has just lowered the ceiling for ground level ozone levels from 75 parts per billion (ppb) down to 70 ppb even though Eastern Europe sets the limit at 60 ppb and a number of medical groups told the EPA that a 60 ppb maximum is required to protect our health, our children's health, the health of our communities (the American Academy of Pediatrics, American College of Preventative Medicine, American Heart Association, American Lung Association, American Medical Association, American Public Health Association, American Thoracic Society, Asthma and Allergy Foundation of America, Children's Environmental Health Network, National Association of County and City Health Officials, National Association for Medical Direction of Respiratory Care, Health Care Without Harm, and Trust for America?s Health).The LNG companies have gotten endorsements from a number of community groups. But a number of other groups, especially from communities closest to the Port, are trying to shut the door on these companies: The Laguna Madre, Port Isabel, and South Padre Island city councils have voted against LNG!The Laguna Madre Water District, Port Isabel Economic Development Corporation, the RGV Hispanic Chamber of Commerce, the Long Island Village Board of Directors (next door to Port Isabel), Sea Turtle Inc, the Lower Laguna Madre Foundation, the Surfrider Foundation (South Texas Chapter), the LRGV local and Lone Star state chaperts of the Sierra Club, and saveRGVfromLNG, have also declared their opposition to LNG.Texas Parks & Wildlife and Defenders of Wildlife have expressed great concern. The Port Isabel School Board rejected Annova LNG's tax break request; the Cameron County Commissioners' Court tabled Annova LNG's request for a tax break pending an examination of the proposed deal by an independent financial expert; and the South Padre Island Businesses Owners Association voted against giving Texas LNG the Letter of Support Texas had requested.Why? They don't trust that the LNG companies are being fully honest about their operations.They're legitimately concerned about the endangerment of their people from floating LNG vapor clouds plus the workability and costs of emergency evacuations and damage control; increased storm surge damage due to the deepening of the channel to the Port to accommodate the larger LNG vessels; the expense to Port Isabel of regularly dredging the channel to the Port; the endangerment of their shrimping industry due to increased large ship traffic and the threats to the mangrove wetlands; the loss of beach and ecotourism; the increased rates of asthma, coronary obstructive pulmonary disease (COPD) and other long term, serious medical conditions associated with such industrial operations; and damage to the largest wetland restoration project in North America. For starters.They earnestly assure us LNG exports are unquestionably good, all good, for our local pocketbooks. Even when confronted with the fact that clearly PRO natural gas groups such as America?s Energy Advantage (www.americasenergyadvantage.org), the American Public Gas Association (www.apga.org), and the Industrial Energy Consumers of America (www.ieca-us.com) tell us LNG exports will be bad for US jobs, bad for the US economy, and will increase our average monthly electric bills (which will probably be reflected as well in increased costs for our monthly purchases of good and services including groceries).Even now, the railroad companies are trying to delay safety measures that would at least lower the risks of oil rail transport to the folks and communities at risk of exploding rail cars.Time and again, our health and safety are compromised, year after year, generation after generation, in favor of business interests that, in the case of oil and gas, have pushed us past the point that we can avoid cataclysmic climate change driven by their interests and actions. The climate catastrophes are already happening around us, around the world. All we can do now is to try to limit the damage, devise and implement workarounds as best we can, learn to expect less from life, get use to more illness, calamity, and death in our neighborhoods and around the world.If you have the power to lower the crossing bar against oil-by-rail terminals, do so. What any of us does at this point may not matter that much any more, but it’s still important for each of us to do the right thing any chance we get. Thank you
Response: Comment acknowledged.	
Zerbey, Suzanne	As a former resident of the FABULOUS Puget Sound, I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.
Response: Comment acknowledged.	
Zuckerman, Naomi	Since all life is connected, disasters that occur there will effect us all, just as climate change is doing. Please do not commit this crime against humanity.
Response: Comment acknowledged.	

Table 7-18. Names Associated with Friends of the Earth Form Letter

-, -	_, Tacitus	`kali?, Dita	a, a	A, Brittany	A, Kim
a., g	A., Maggie	A., Matthew	Aanestad, Emil	Aanestad, Emil	Aaron, Kris
Abass, Liela	Abatuno, Martha	Abaunza, George	Abbatt, Chloe	ABBONDANTE, JIM	Abbott III, Basil Norris
Abbott, Emily	Abbott, G D	Abbott, John	Abbott, Laura Rose	Abbott, Marina	Abbott, Rich
Abby, Kathy	Abdelhadi, Jenna	Abdullah, Hasana	Abdul-Mu'min, Hadiyah	Abel, Diane	Abel, Donald
Abele, Charles	Abele, Melitta von	Abercrombie, Mr. Jonathan	Abernathy, Cindy	Abery, Chris	Abraham, Mindy
Abrahamson, Shawn	Abrams, Sally	Abrams, Steve	Abrams, Susan	Abrioux, Marie-Laure	Absten RN, Maureen A
Acda, Joyce	Acebo, Ryan	Acee, Noreen	Acee, Noreen	aceto, robert	Acevedo, Elizabeth
Achter, James	Ackerman, Frank	Ackerman, M.D., John	Ackley, Pamela	ACLUPEN, JOY	Acopine, Nancy
acord, Bill	Acosta, Alberto	Acosta, Oralia	Acosta, Richard and Jane	Acton, Lynn	Acuff, Jotham
Adamkovich, Rosemary	Adamo, Harriet	Adamo, Louis	Adamov, Gabriela	Adams, A	Adams, Brynn
Adams, Chardae	adams, charlotte	Adams, Ekaterina	Adams, Grace	Adams, Joyce	Adams, Joyce
Adams, kaatje	Adams, Lauren	Adams, Lynn	Adams, M	Adams, Marci	Adams, Margaret
Adams, Maryanne	Adams, Moses	Adams, Pam	Adams, Paula	Adams, Robert	Adams, Ron
Adams, Victoria	Adamson, Deb	Adamson, Jacqueline	Adan, Elizabeth	Addington, Paul	Addis, Linda
Ade, Hillary	Adebanjo, Doris	Adelman, Martin	Adelman, Zena	Adelson, Julie	Adena, Sharon
Adkin, Maureen	Adkins, Dennis	Adler, Dana	Adler, Steve	Adoue, Miss Novella	Adrian, Judith
Adrian, Stephanie	Adrian, Stephanie	Aelstyn, Edward van	Aere, Honora-Bright	Afanasiev, Victor	Affolter, Angie
Aflatooni, Mark	agard, lisa	Aggers, Kathleen	Agigian, Amy	Agonito, Joseph	Agoston, Linda
Agozzino, Maria Teresa	Agranoff, Ann	Agrista, Rosemary	Aguilar, Javier	Aguilar, Uriel	Aguilar, Victor
Aguiluz, Ricardo	Aguirre, Guillermina	Aherne, Deborah	Ahlberg, Ken	Ahlers, Deborah	Ahlstrand, Heidi
Ahrens, Gerry	Ahrens, Jane	Aicher, Mr. Jed	Aiken, Taylor	Aikin, Dawn	Ailill, Dane
Ainsley, Brian	Aiona, Liane	Aisling, Raven	Ajemian, Peter	Ajgaonkar, Shamili	Akeia, Randa
Akers, Kari	Akom, ms Denise	Aksman, Cyrene	Aksman, Cyrene	Alagammai, Andrea	Alan, Marin
Alaniva, Lori	Alaris, Angel	Albanese, Dana	Albanese, Dawn	Albar, Mike	Alberts, Allison
Albertsen, Jennifer	Albrecht, Don	Albrecht, Kathryn	Albrecht, Mr. Lonnie	Albrecht, Volker	Albright, Evan
Albuquerque, Amanda	Alcantara, Anita	Alcorn, Kay	Alden, Cynthia	Alden, Lucas	Alden, Rory
Alderete, Katherine	Alderman, Mick	Alderson, Cara	Aldous, Gail	Aldred, Rich	Aldrich, Jim
Aldrich, Jim	Aldrich, John	Aldridge, Jack	Aleff, Peter	Aleff, Peter	Aleksandr
Alexander, Amy	Alexander, Andrea	Alexander, Ben C.	Alexander, J	Alexander, Mark	Alexander, Mark
Alexander, Mary	Alexander, Ms. Jenifer	Alexander, Nikki	Alexander, Paul	Alexander, Rhetta	Alexander, Wanda
Alexandrino, Maria	Alfaro, Elaine	Alfonso, Nadine	Alford, Alice	Alhadeff, Jere	Alicea, Luz
Alippe, Lorraine	Alison, Cheryl	Al-Khateeb, Caressa	Allan, Jessica	Allara, David	allarde, lisa
Allaway, Robin	Allbee, Greg	Allee, Pennelloppe	Allely, Warren	Allemann, Kevin	Allemann, Kevin
Allemann, Kevin	Allen, Aaron	Allen, Anthony	Allen, Bruce	Allen, Dakota	Allen, David
Allen, David	Allen, Donna	Allen, Geoffrey	Allen, James	Allen, Jo	Allen, John
Allen, Judy	Allen, Kambra	Allen, Karin	Allen, Linda	Allen, Mary	Allen, Mr. Dennis Wayne
Allen, Ms Michaell	Allen, Neale	Allen, Pamela	Allen, Rev. Lowell	Allen, Richard	Allen, So
Allen, Steve	Allen, Susan	Allen, Thomas	Allen, Tim	Allende, Lois	Alley, Julie
Allington, David	Allison, Brittany	Allison, Connie	Allison, Kelly	Allison, Stuart	Allison, Valerie
Allman, Lecia	Allman, Lecia	Allmark, Liz	allmendinger, belle	Allocca, Michaelangelo	Allsup, Romalda
Allum, Neville	Allyn, Jim	Alma, Shawn	Alman, David	Almeida, Jorge	Almgren, Per
Almomani, Rawan	Almskaar, S. P.	Alpers, Nancy	Alston, Patricia	Altair, Octaevius	Altar, Jane
Altman, Barbara	Altman, Jane	Altman, Peter	Altum, Angelika	alvarado, jose	Alvarado, Rossana L

Alvarez, Ana	Alvarez, Christina	Alvarez, David Acebo	Alvarez, Rene	Alvarez, Sarah	Alvarez, Shirley
Alvarez, Veronica	Alves, Cesar	Alvey, Dr. Richard and Mrs. Donna	Alvino, T	Alward, Phillip	Amalfitano, Gloriamarie
Aman, Mark	Amann, Skylaar	Amari, Miriam	Amatucci, Vinny	Ambos, Marilyn	Ambrowiak, Rose
Ambuske, Denise	Ameen, Arshad	Amend, Andrea	Amendt, Rod	Ames, David	Ames, Sandra
Ameur, Hanafi	Amier, Nilofar	Aminu, Bello	Amiras, Angelique	Amour, Greg	Ampeliotis, Ruth
Ana, Bianca Sta	Anastos, Sheri	Andarmani, Kristine	Anderholm, Mr. Jon	anders, mary	Andersen, Dean
Andersen, Eric	Andersen, Evette	Andersen, Kirsten	Anderson, Aaron	Anderson, Aaron	Anderson, Amy
Anderson, Arlene	Anderson, Barry	Anderson, Betty	Anderson, Billie	Anderson, Carl	Anderson, Carol
Anderson, Carole	Anderson, Cathy	Anderson, Cheryl	Anderson, Cheryl	Anderson, Christine	Anderson, Christine
Anderson, Crystal	Anderson, Dave	Anderson, Donna	Anderson, Doug	anderson, edna	Anderson, Erik
Anderson, Frank B.	Anderson, Gillian	Anderson, Glen	Anderson, Helen	Anderson, Isobel	Anderson, James
anderson, janie	Anderson, Jennifer	Anderson, Jessica	anderson, jk	Anderson, Jo Ann	Anderson, Jordan
Anderson, Joy	Anderson, Julie	Anderson, Karen	Anderson, Karen	Anderson, Karen	Anderson, Karen
Anderson, Kate	Anderson, Kristina	anderson, lori	Anderson, Lynn	Anderson, Margaret	Anderson, Margaret
Anderson, Marilyn	Anderson, Matthew	Anderson, Megan	Anderson, Meredith	Anderson, Michelle	Anderson, Mr. Dan
Anderson, Mrs. Dorothy	Anderson, Nancy	Anderson, Nancy L.	Anderson, Palmer	Anderson, Rhonda	Anderson, Robert
Anderson, Roger	Anderson, Sandy	Anderson, Sharil	Anderson, Shirley	Anderson, Stephen	Anderson, Timothy
Anderson, Warren	Anderson, William	Anderson`, Brad	Anderton, Phillip	Andeway, Kathy	Andon, Joan
Andre, Javier	Andreas, Egli Veronika und	Andress, Donald	Andretta, Jeaneen	Andrew, Deborah	Andrews, Andrew
Andrews, Carolyn	Andrews, Damien	Andrews, Denis	Andrews, Lee	Andrews, Marcia	Andrews, PhD, Dr. Katherine
Andring, Pat	Androlia, Kim	Andros, Charles Frederic	Andrus, James	Andrychowski, Steven	Andujar, Julio
Anduskey, Susan	Ange, Robert	Angel, Amber	Angeles, Christine	Angelino, Paul	angell, j
Angelli, Terry	angelo, marjorie	Angelosanto, Joan	Angelus, Austin	Angleberger, Joyce	Angotti, Kathleen
Angulo, Jairo J	Angus, Billy	Ankelman, Michael	Anker, Elizabeth	Anker, Robert	Ankerson, Jan
Ankli, Gene	Ann, Tina	Annderson, Jefree	Annecone, Lisa	Ansara, Mark	Ansell, Martin
Ansley, Sierra	Ansley, Sierra	Antalek, Elizabeth	Anthony, Alexandra	Anthony, Hal	Anthony, Jocelyn G.. T.
Anthony, Judy	Anthony, Kristin	Anthony, Linea	Antonecchia, Nancy	Antoniades, Ellen	Antonoplos, Barbara
Antunes, José Morais	Apfel, Sarah	Apodaca, Holli	Appel, Debbie	Appeltofft, Jazmine	Applebaum, Doris
Applebaum, Robert	applegate, william	Appleton, Joseph	Aprile, Kathy	Apsit, Victoria	Araiza, Adalberto
Aram, Ms. Susaan	Arana, Josefa	Aranda, Laura	Araujo, Isabel	Arauza, Phillip	Arbuckle, Kimberly
Arce, Jose	Arcery, Vincent	Archambault, Caitlin	Archibald, Kathy	Archuleta, Rhonda	Arconati, Lois
Arden, Kathy	Ardoin, Karen	Arellano, Andrew	Arentoft, Michael	Argento, Michael	Arguello, Ms. Tanya
Ariani, Kade	Arlen, Barbara	Armantrout, Margie	Armbrust, Sally	Armelin, Dale	Armenta, Amira
Armenta, Suzette	Armistead, Melinda	Armitage, Chris	Armm, Barbarosa	Armour, Kelly	Armstrong, Adaria
Armstrong, Chris	Armstrong, Dan	Armstrong, David	Armstrong, David	Armstrong, Dessi	Armstrong, Jesse
Armstrong, Johnny	Armstrong, Kelley	Armstrong, Leslie	Armstrong, Marcellus	Armstrong, Mary Jane	Armstrong, pat
Armstrong, Patricia	Armstrong, Patricia	Armstrong, Patricia	Armstrong, William	Armstrong, William	Arnejo, Joshua
Arney, Becky	Arnold, Ben	Arnold, Carlos	Arnold, Charles L	Arnold, Edward	Arnold, Joan
Arnold, Ms. Cynthia M	Arnone, K.	Arnone, Lisa	Arntson, David	Arntz, Diana	Aron, Evelyn
Aronoff, Nina	Aronow, Myra	Aronson, Reevyn	Aronson, Sylvia	arora, sarika	Arosemena, Barbara
Arquilla, Vance	Arrendondo, Erica	Arreola, Marla	Arrindell, Richard	Arrivee, David	Arrowood, Madeline
Arroyo, Eric J.	Arroyos, Glory	Arslan, Alp	Artemis, Jane	Arter, Sue	Arthur, Cheryl
Arthur, Mike	Arthur, Richard	Arvidson, Robert	Ary, David	Asada, Akira	Asaye, Kassahun
Asbury, Margaret	Asch, Peter Adler	Aschenbrenner, Alexis	Aschenbrenner, Stanley	Ascott, Madeleine	Ash, Joy

Ash, Michelle	Ash, Sidney	Ashcraft, James	Asher, Louis	Ashkenase, Roberta	Ashley, Claudette
Ashley, Eric	Ashley, John	Ashley, Marilyn	Ashmore, Kate	Ashton, Mrs. Elyse	Ashworth, William
Asker, Michelle	Askerova, Lana	Askins, Susanna	Asling, Michelle	Asteinza, Maria	Ater, Daniel
Athanasiou, Yiannis	Athans, Richard	Athavale, Anjali	Atkin, Ann	Atkins, Deborah	Atkins, Ed
Atkins, Sandra	Atkins, Stephen	Atkinson, Barbara	Atkinson, Catherine	Atkinson, Chuck	Atkinson, Ellen
Atkinson, Ellen	Atkinson, Heather	Atkinson, Melissa	Atlas, John	Atman, Brie	Atterberry, Matthew
Atwater, Tim	Atwell, J.	Atwood, Bob	Atwood, Nicolej	Atwood-Adams, Tanya	Aubuchon, Diana
Audette, Jarryd	Auer, Charles	Auer, Charles	Auer, Patricia	Auerbach, Cassandra`	Auerbach, Delayne
Auge, Nathan	Auger, Sylvie	Aughey, Arlene	Aul, Greta	Aulde, Susan	Aultman, Reynolds
Aumer, Aj	Aungst, Judith	Aurian-Blajeni, Dan	Austen, Eileen	Austin, Barbara	Austin, Christine
Austin, Lyle	Austin, Madeleine	Austin, Samuel	Autry, Anne	Avedisian, Sandra	Avellino, Frank
Averitt, Karen	AVERY, NOEL	Avett, John	Avila, Dayana	Aviles, Sijisfredo	Avocet, Lani
Awasthi, Jordan	Axelrod, Russell	Axelsen, Martin	Axten, Gary	Ayala, Peter	Aydelott, Mr. Steve
Ayer, Jude	Aylward, David	Ayotte, C	Ayoub, Marina	Ayyar, Adarsh	Aziz, Iza
Aziz, Mark	Azpurua, Angelica	Azzarello, Joe	B, Alana	B, Alison	B, B
B, Betty Surprenant	B, Charline	b, dennis	b, j	B, Julia	B, Kate
B, Kay	B, L	B, Lauren	B, Maggie	B, Mike	B, N
B, Paula	B, Phil	B, Regina	B, S	b, s	B, S
B, Sayles	B., Aimee	B., Reba	B., Sharon	Babcock, Linda	Baber, Jana
Babiak, Ms. Katherine M	Babrick, Carla	Babst, Ms. Christina	Babula, Mr. Richard	Baca, Raquel	Baccarat, Tanya
Bacci, Teresa	Bach, Julie	Bach, Ronald	Bachman, Barbara	Bachman, Fritz	Bachman, James
Bachman, James	Bachner, JoAnn K	Bachner, Suzanne	Backman, Barbara	Backman, Lara	Backus, Lee
Baclija, Martin	Bacon, Carol	Baddeley, Andrea	Badella, Gloria	Badenoch, Scott	Bader, Jessica
Bader, Judith	Bader, Larry	Bader, William	Baechler, Miss Neah	Baer, Howard	Baethge, Sarah
Baez, Ivelisse	Baffa, Valerie	Bagaratee, Yuds	Baggs, Bo	Baglini, Sidne	Bagwell, Amy
Bahn, Mr. Ted	Bahr, Dennis	Bahr, William	Bahris, Angie	Bahrt, Eric Bahrt	Bahuman, Sarah
Bahus-Meyer, Mary	Baier, Bryan	Baierschmitt, Anne	Bailey, Arthur	Bailey, Chuck	Bailey, Daniel
Bailey, Diane	Bailey, Elaine	Bailey, Helen	Bailey, Janice	Bailey, Jessica	Bailey, Kathleen
Bailey, Lee	Bailey, Marcia	Bailey, Sharon S	Bailey, Shayna	Baillio, Chris	Bailly, Barbara
Bails, Jean	Baily, Lynn	Bain, Frederika	Bainbridge, Claudia	Bains, Mr. Jeffrey	Bair, Stephanie
Baird, Lawrence	Baird, Marissa	Baird, Steven	Bajaj, Florence	Bajda, Celia	Bajwa, Ravinder
Baker, Alison	Baker, Arlene	Baker, Charlie	Baker, Dee	Baker, Devin	Baker, Diana
Baker, Jeanne	Baker, Joel	Baker, Kathie	Baker, Kelsey	Baker, Mark	Baker, Mary
Baker, Mary Sue	Baker, Megan	Baker, Michael	Baker, Mikal	Baker, Patricia	Baker, Paul
Baker, R.	Baker, Sara W.	Baker, Sharon	Baker, Stacia	Baker, Tina	Baker-Arrowsmith, Megan
baker-lee, Ms. marie	Baker-Smith, Gerritt and Elizabeth	Baker-Stapleton, Jean	Bakker, Clara	Bakko, Theresa	Bakow, Janice
Bakr, Rania	Baksyte, Laura	Bala, Sheree	Balaam, Deirdre	Balaban, Susan	Balan, David
Balaska, Konstantina	Balcon, Cecilia Dal	Baldassarre, Laura	Baldassarre, Laura	Balder, James	Baldi, Melanie
Baldo, Nathaniel	Baldridge, James	Baldwin, Chris	Baldwin, Chris	Baldwin, Lauren	Baldwin, Leland
Baldwin, Tanya	Bales, Amber	Baley, Patricia	Balfour, Linda	Balfour, Michele	Balgaard, Diana
Balice, Guy	Balik, Susan	Balint, Kathy	Balk, Garrick	Balkin, L.r.	Ball, David
Ball, Eli	Ball, Evelyn	Ball, Kiki	Ball, Kiki	Ball, Kimerlea	Ball, Lianne
Ball, Terry	Ballan, Timothy	Ballance, Pamela	Ballard, Christine	Ballard, Cliff	Ballard, John
Ballenger, Barbara	Ballentine, Wanda S	Ballew, Catherine	Ballew, LouAnn	ballou, ali	Ballou, J
Balombin, Clare	Baltin, Brian	Baltz, Barbara	Bamburg, Paula	Bamburg, Paula	Bamburg, Paula
Bamford, Robert	Banach, Mr. John	Banerjee, Pranab	Baney, Marge	Banfield, Don	Bangham, Jerry
Banghart, Robert	bank, helene	Banks, Janice	Banks, Krista	Banks, Maureen	Banks, Michael
Banks, Ms Hannah	Bannerman, Betsy	Bannister, Richard	Bannon, Kevin	Banyai, Deborah	Bao, James

Baouche, Karen	BaRa, Asa Javier	Barack, Max	Baraini, Olimpia	Baran, Cecily	Baranowsky, Robert
Baratta, Jennifer	Barbe, Steve	Barber, Frances	Barber, jim	Barber, jim	Barber, Nick
Barberic, Nevena	Barbezat, Mary	BARBIER, Chloe	Barbour, Brenda	Barboza, Candace	Barcelo, Martin
Barcott, Nick	Bardes, Nancy	Barge, Helen	Bargen, Walter	Barger, Elizabeth	Barger, John
Barile, Kathryn	Barker, Bartholomew	Barker, Carolyn	Barker, Charles	Barker, Cina	Barker, Claire
Barker, Howard	Barker, Jean	Barker, Jennifer	Barker, Ms. Anne	Barker, Reginald	Barker, Taylor
Barker, Yvonne	Barkow, Susan	Barksdale, Joshua	Barlow, Scott	Barmore, Matthew	Barnard, Sylvia
Barnes, Alec	Barnes, Beth	Barnes, Brooks	Barnes, Christy	Barnes, Elizabeth	Barnes, Hyatt
Barnes, Linda Sue	Barnes, Michael	Barnes, Noel	Barnes, Patricia	Barnes, Sharon	Barnett, Claire
Barnett, Elizabeth B.	barnett, renee	Barney, Diana	Barney-Campbell, Noenoe	Barnhart, Katherine	Barns, Suzanne
Barnwell, Robert	Barocca, Barbara	Baron, Dave	barone, Steve	Barr, Brian	Barradas, Carlos
Barradas, Carlos	Barranco, María del Pilar	Barreca, Joseph	Barreto, Stanley	Barrett, Cathy	Barrett, Charles
Barrett, Donald	Barrett, Fiona	Barrett, Hannah	Barrett, Keiko	Barrett, Lisa	Barrett, Martha
Barrett, Sarah	Barrett, Susan	Barringer, Thomas	Barrington, Tim	Barrio, Maria Sagrario	Barrios, Bradley
Barrison, Steve	Barron, Mikail	Barron, Tiobe	Barrow, Mary G	Barrowman, Penny	Barrows, Patrick
barrs, alicia	Barry, Dwight	Barry, Ingrid	Barry, jim & Mary Jane	Barry, jim & Mary Jane	Barry, Lynda
Barry, Marilyn	Barry, Raymond	Barshow, Dick	Barson, Kalanit	Bartels, John R.	Bartels, Joyce
Barth, Joline	Barthel, John	Barthelow, Marilyn	Bartholomew, Carolyn	Bartle, Karen	Bartleman, Mark
Bartlett, Brandon	Bartlett, Deborah	Bartlett, Elizabeth	Bartlett, Raymond	Bartlett, Raymond	Bartlett, Steven
Barton, Durk	Barton, Sabreena	Barton, Susie	Barton, Wendy	Bartos, Janet	Bartos, Scott
Bartosz, Jane	Bartz, Roxanne	Baruch, Duncan	Barve, Purnima	Bashir, Qazi	basil, joyce
Basile, Catherine	Basile, Diane	Basileo, Michael	Basiliere, Eric	Basker, Robert	Baskett, Suzanne
Basman, Melis	Basnar, Lee	Bass, Betsy	Bass, Caren	Bass, Jenny	Bass, Sandy
Bass, Wanda	Bassett, Christine	Bassi, Claudia	Basso, Marjory	Bastian, Bob	Bastide, Philippe
Baston, Roger	Bastron, Becca	Basye, Mae Mae	Batarseh, Lillian	Bateman, Abby	Bateman, Guy
Bates, Abigail	Bates, Abigail	Battaglia, Anna	Battaglia, Rosemary	Battaglio, Patty	Battaly, Gertrude
Battat, Ovid	Batten, Jacqueline	Batten, Jacqueline	Batterink, Lydwien	Battersby, Caroline	Battis, Stephen
Battle, Dorothy	Battley, Tacey	Battye, Pat	Bau, Roger	Baucco, Matthew	Bauer, Cynthia
Bauer, Dr. Ernst	Bauer, Heather	Bauer, Jon	Bauer, Lani	Bauer, Melissa	Bauer, Mr. Gary
Bauer, Robert	Bauer, Ruth	Bauer, Thomas	Baugh, Rebecca	Baughman, Jo Ann	Baughns, Peggy
Baum, Miriam	Baum, Rhona	Baum, Veronica	Baumann, Deborah	Baumgartner, Judy	Baumgartner, Will
baumstark, tom	Baur-Guth, Regine	Bautista, Mary	Bautista, Melvin	Bautista, Melvin	Baver, Beverly
bavers, michael	Baxter, Jo	Baxter, Lou	baxter, tim	Bayait, Robert	Bayer, Alicia
Bayer, John	Bayer, Ted	Baylor, Brad	Bayona, Antonio	bays, r	Bazinet, Mr. Jon
Bazos, Barbie	Be, Marian	Beach, Mr. Paul	beach, p	Beam, Robert	Beamer, John
bean, edie	Bean, Heidi	Bean, Krisallen	Bear, Nicole	Beard, Valerie	Beardshear, Donald
Beardsley, William	Beasley, Chris	Beathard, Erin	Beatini, Tom	Beattie, Evan	Beattie, Jane
Beatty, Diane	Beauchamp, Alice	Beauchamp, Beryl	Beauchamp, Catherine	Beauchemin, Sharon	Beaudin, Ellen
Beaufeaux, Kathe	Beauford, Sally	Beaulieu, Nancy	Beaulieu, Nancy	Beaulieu, Renee	Beaulieu, Richard
Beaumont, William	Beaver, Betty	Beavers, John A	Beavers, Nancy	Bechko, Corinna	Bechmann, Elisabeth
Bechtel, William	Beck, Dana L	Beck, Ea	Beck, Eric	Beck, Patrice	Becke, George
Becker, Carol	Becker, Christine	Becker, Elaine	Becker, Jaime	Becker, Martin	Becker, Rick
Becker, Shannon	Beckerman, Gary	Beckham, Brice	Beckham, Marie Beckham	beckham, matt	Beckman, Mary
Beckmann, Annie	Beckrich, Judith	Becroft, Priscilla	Becsky, Catherine	Bedding, Gerhard	Beddoe, Martha
Bedendo, Emanuela	Bedford, Marion	Beebee, Kara	Beer, Julie	Beerggren, Richard	Beerk, Fred
Beers, Jodi	Begalke, Donald	Begalske, Leigh	Behar, Victoria	Behl, Dan	Behl, Heike
Behl-Whiting, Kathy	Behnke, Jennifer	Behr, Alec	Behrens, Barbara	Behrens, Carla	Behringer, Evan
Beigel, Lynda	Bein, Ann	Bein, Jeanie	Bein, Keith	Beitzel, Margaret	Beitzel, Margaret

Bejgrowicz, Thomas	Bekker, Bruce	Belair, Rejane	belcastro, frank	Beletsky, Aggie	Belknap, Robert
Bell, Amy	Bell, Bryan	Bell, Chris	Bell, Darryl	Bell, Elizabeth	Bell, Frances
Bell, John	Bell, John	Bell, Lesli	Bell, Mr. T	Bell, Pat	Bell, Ruby
Bell, Ruby	Bell, Shandra	Bell, Teresa	Bell, Tom	Bellacosa, Angela	Belland, Jessamine
Bellano, Jennifer	Bellem, Sarah	Beller, Peri	Bello, D	Belloli, Joyce	Bellville, Bonny
Belmont, Peter	BELTER, JERRY	Beltram, Al	Bembenek, Daniel	Bemis, Carolyn	Benane, Barbara
Benardo, Sally	Benavides, Eddie	Benavides, P.	Benbow, Sangeeta	Benchimol, Eric	Beneath, David
benedek, melinda	Benedict, Marc	Beneduce, Roberta	Benefiel, Don	Benes, Marcia	Bengel, James
Benham, MS, Elyce M.	Bening, Allison	Benjamin, Corey	Benjamin, Elaine	Bennatti, Carolyn	Benne, Liz
Bennett, BL	Bennett, Brad	Bennett, Bryan	Bennett, Cheryll	Bennett, Cynthia	Bennett, Ed
Bennett, John	Bennett, Marcia	Bennett, Mark	Bennett, Maurice	Bennett, Michael V L	Bennett, Paula
Bennett, Raechel	Bennett, Thomas	Bennett, Virginia	Bennett, Walker	Benning, Rex	Bennington, Shiki
Benoit, Madalyn	Benschoter, John	Benson, Barbara	Benson, Donnie	Benson, Douglas	Benson, Julie
Benson, Sydney	Bentivegna, Peter	Bentivoglio, Chris	Bentley, Kathleen	Bentley, Pauline	Benton, Pamela
Benton, Susan	Bentz, Eva	Benveniste, Heide	Berchert, James	Berdahl, John	Berezansky, Nick
berg, heather	Berg, Keith	Berg, Rachel	Berger, Alex	Berger, Dan	Berger, Elmer
Berger, Joan	Berger, Karen	Berger, Keith	Berger, Richard	Bergeron, B	Bergeron, KELLY
Bergeron, Lisa	Bergesen, Carol	Bergey, Nancy	Bergh, Patricia	Berghammer, Annette	Berglund, John
Berglund, Spencer	Bergquist, Jim	Bergren, Stephen	Bergsma, Audrey	Bergsma, Debi	Bergstrom, Bo
Bergstrom, Brenda	Berkeley, Pauline	Berkemeijer, Belinda	Berkheimer, Mrs. Nicole	Berkovich, Eugene	Berkowitz, Carol
Berlad, Tina	Berle, Neville	Berlin, Maja	Berliner, Ms. Diane	Berling, Marilyn	Berman, Christy
Berman, Donna	berman, libby esther	Berman, Mrs. Juliann	Berman, Steve	BERMEA, STEPHANIE	Bermingham, Dorman
Bernaert, Ruthie	Bernard, Janice	Bernard, Paulette	Bernardina, Ilona Della	bernasconi, antonella	Bernat, Ric
Bernet, Maurita	Bernier, Elizabeth	Bernstein, Dr Jerry and Siri	Bernstein, Laura	Bernstein, Laura	Berntsson, Susanne
Berry, David	Berry, Donald	Berry, Donald	Berry, Elizabeth	Berry, Jane	Berry, Kyra
Berry, Vic	Bersani, Vanessa	Berson, Harriet	Berta, Susan	Bertaina, John	Bertels, Stephanie
Berti, Ron	Bertin, Hector	Bertinuson, Cathy	Berton, Alexa	Bertram, Travis	Berwaldt, Michael
Berzel, Janice	Besancon, Maureen	Bescher, Jill	Bescript, Ms. Linda	Best, Douglas	Best, Herman
Best, Herman	Best, Herman	Best, Jan	Best, Lourdes	Best, Vicki	Bester, Lionel
Bethel, Diana	Bettencourt, J C	Betterton, Elaine and David	Betti, Mark	Betts, Justin	Betz, Linda
Beuscher, Will	Beuscher, Will	Beutel, Teresa	Beveren, Chantal	Beverly, Aaron	Beverly, J
Beverly, Robert	Beverly, Susan	Bevington, Adrienne	Beyrer, Laurel	Bezjak, Barbara	Bezuidenhout, Francois
Bhakti, Sara	Bhatt, Rajat	Bhatt, Rajat	Bianchi, Don	Bianchi, Vicki	Biang, Carole
Bible, Lee	Bickers, Mr. Kevin	Bickers, Mr. Kevin	Bicking, Ann	bickley, suzanne	Bicoy, Candice
Bidne, Gayle	Bidwell, Troy	Bie, Audun	Biederman, Sue	Biehl, Robert	Biel, Timothy
Bieniek, Sandra	Bierbaum, Rebecca	Bierlein, Marcie	Bierling, Leo	Biery, Boni	Bifulco, Kimberly
Bigelow, Andrew	Biggane, Michele	Bigler, Kathy	biler, c	Bill, Alma	Billeaud, Theresa
Billington, Marion	Billmeier, Jr., MD, Gerard J.	Bills, Allison	Bilodeau, Bill	bilski, Dave	Bilsky, Cathy
Bilwin, Gina	Bin, Gomi	Binder, D.	Binder, Mr. Gene	Bingham, Charles	Binz, Ella
biondi, s	Birch, Joan	Bircher, K Kay	Bird, Jan	Bird, Oscar	bird, Sophie Galleymore
Bird, Zoe	Birdwell, Jerry	Birkam, George	Birkeland, Celeste	Birkenes, Sondra	Birkett, Courtney
Birkholz, Linda	Birnbaum, Jacqueline	Bisbee, Melia	Biscardi, Maureen	Biscardi, Nancy	Bishop, Janice
Bishop, Joel	Bishop, Miss Cori	Bishop, Mr. Scott	Bishop, Vivie	Bisker, Edward	Biskey, Kathy
Bisschop, Peter	Bissell, Mary	Bissell, Miss Mary	Bissell, Rosalind	Bixby, Sandee	Bjork, Arthur
Bjork, Cary	Bjork, Nils	Bjork, Nils	bjork, vince	Bjork-James, Sophie	Bjorngaard, Ericka
Black, Arlene	Black, Diane	Black, Karina	Black, Mary Ann	Black, Monica	Black, Ms. Nancy

Black, Nancy	Black, Perry	Black, Perry	Black, Robert	Blackburn, Dariel	Blackburn, Diane
Blackburn, Lee	Blackburn, Paul	Blackburn, Sandra	Blackfeather, Talullah	Blackman, Jay	Blackmore, Ellen
Blackstone, Linore	Blackwell, Bruce	Blackwell-Marchant, Pat	BlackWolf, Steve	Blackwood, Barbara	Blain, Mr. Richard
Blain, Susan	Blair, Dave	Blair, Judith	Blair, Stephen	Blake, Mr. Al	Blake, Nancy Jane
Blake, Richard	Blakely, Linda	Blakeman, Van	Blaker, Shawna	Blakey, Dan	Blakley, Margaret
Blakney, Richard and Elizabeth	Blalock, Marilyn	Blanchard, Ann	Blanchfield, Tom	Blanco, Daniel	Bland, Michael
Bland, Mr James	blandford, mark	Blank, Gail	Blanton, Cricket	Blanton, Patrick	Blasco, Natalie
Blatchford, Amanda	Blatman, Resa	Blatt, Gail	Blau, Louis	Bleckinger, Mr. Dana	Blesoff, Marc
Blevins, Terri	Bliden, Michael	Bliss, Elaine	Bliss, Nancy	Blissett, Lesley	Blitz, Danny
Blitz, Ruth	Bloam, Nicole	Block, Gary	Block, Julie	Block-Brown, Robert	Blodgett, Jennie
Blodgett, Linda	Bloedow, MaryAnn	Blomquist, Karen	Blond, Olivia	Blonsky, Audrey	Bloodworth, Stacy
Bloom, Kathy	Bloom, Steve	Bloomfield, Elisabeth	bloomfield, jeff	Bloomquist, Timothy	Blosser, Frederick
Bloyd, Tara	Blubaugh, Susan	Blue, L	Bluhm, Kathy	Bluhm, Michael	Blumberg, Zack
Blume, Louise Rose	blumenthal, christa	Blumenthal, Mr. Robert	Blumenthal, PhD, Fred A.	Blydenburgh, Meghan	Blythe, Joanne
Boatman, Larry	Boatman, Rebecca	Bobek, Gabriel	Bobroff, Alex A.	Bocchicchio, John	Bochenek, James
Bockino, Alida	Bodegraven, Mark Jolly-Van	Bodin, Anne	Boeckermann, Jesse	Boeckx, Ashley	Boehm, Anita
Boehm, Chelsee	Boehm, David	Boehm, Denny	Boelsma, Barbara	Bogacki, Paul & Jackie	Bogart, Leslie
Boggs, George	Boggs, Nancy	Bogin, Ronald	Bogios, Constantine	Bogolub, Mr. Larry	Bogs, Cynthia
Bogue, Nancy	Boguske, Matthew	Bohac, Stephen	Bohan, Bridget	Bohin, Holly	Bohler, Mrs. Judith A
Bohlin, Jeremy	Bohlman, R. Christopher	Bohn, Ms. Diana	Bohn, Patrick	Boice, Ruth	Boisgard, Isabelle
Boland, Dolores	Boland, Ruth	Bold, Arne	Bolden, Robert	Boldrini, Byron	Bolen, DK
Bolen, William J	Boles, Elaine	Boles, Judith	Boletchek, Stephen	bolin, clarence bolin	Bolker, Thomas
Boll, Charlotte	Bollard, Timothy	Bollea, Marcia	Bolles, Matthew	Bolocan, David	Bolton, Christopher
Bolton, Linda	Bolton, Sabrina	Bomar, Stephanie	Bombay, Jennifer	Bompensa, Suzanne	Bomze, Bracha Nechama
bon, Maria	Bonanni, Loveley	Bonc, Julie	Bonczak, Gary	Bond, Kent	Bond, Kent
Bond, Kent	Bond, Mike	Bondi, Rebecca	Bondoc, Michael	Bonetti, Mrs. Donna	Bonfield, Barbara
Bonifaci, Bruce	Bonilla-Jones, Carmen Elisa	Bonini, Andrea	Bonk, Denise	Bonk, Ms. Marliese	Bonkoski, Jane
Bonner, Tracey	Bonnet, Debbie	Bonnet, Fred	Bonney, David	Bonney, Dr. Patty	Bonnici, Corinne
Bonvouloir, Ms. A	Booher, Barbara	Booher, David	Booher, David	Bookheimer, Donna	Bookland, Bill
Bookless, Vicki	Bookwalter, Sally	Boone, Amanda	Boone, Rita	Boortz, Brian	booth, jacalyn
Booth, Nancy	Bor, Robb	Boraby, Mr. Ali	Borawick, Ma	Borba, Katheen	Borbo, Gilmer
Borbon, Marta	Borchers, Margie	Bordallo, Eugene	Bordelon, Pat	Bordelon, Tika	Borgerson, John
Borgquist, Ronald B.	Borin, Victoria	Borjesson, Karin	Borman, Windy	Bornholtz, Gavin	Boroshok, Ruth
Borowy, Maureen	Borrege, Sharon	Borri, Patricia	Borske, Cindy	Borst, Tom	Bortfeld, Derek
Bortoletto, Federico	Bos, Katherine	Bosch, Maria	Bosch, MD, Milton	Bosold, Patrick	Boss, Gianluca
Bosserman, Anne	Bossert, Elizabeth	Bossert, J Michael	Bossert, Kristen	Bostic, Marty	Bostock, Ms. Vic
Bostyan, Ashley	Both, Bill	Botic, Marjana	Bott, Kevin	Botterill, Leanne	Bottesch, Ms. Marla
Botticelli, Carole	Bottleman, Leonard	Bottleman, Leonard	Bottom, Julia	Botwinick, Joan	Bouchard, Andrea
BOUCHER, ERIC	Boucher, Jean	Boucher, Tasha	Boucherat, Marie pierre	Boudreau, David	Boudreaux, Adam
Boudriot, Simone	Bough, Richard	Boughton, Taiisa	Boukouzis, Dee	Boult, Niel	Boum, Robert
Boumechal, Amina	Bounds, Andrea	Bourassa, Veronica	Bourlotos, George	Bourret, Dennis	Boury, Andrea
Boutros, Audrey	Bouvia, James	Bouyea, Lauren	Bova, John W.	Bovee, Michael	Boven, Marlene

Bovenkerk, Janet	Bowen, Beverly	Bowen, Richard	Bower, Jerry	Bowerman, Catherine	Bowers, David
Bowers, Seneca	Bowley, Kat	Bowman, C. A.	Bowman, Candy	Bowman, Charles	Bowman, Charles
Bowman, Julie	Bowman, Mary	Bowman, Rebecca	Bowron, Alice Winfree	Bowser, Lamont	Bowstead, John
Bowyer, Sallye Steiner	Box, Ken	Box, Steve	Boyce, Janice	Boyce, LeRoy	Boyce, Nancy
Boyce, Pj	Boyce, Richard	Boyd, Carolynn	Boyd, Ed	boyd, ernest	boyd, ernest
Boyd, Karen	Boyden, Patricia	Boyer, David	Boyer, Paula	Boyer, Tod	Boyers, Gary
Boyle, Dan	Boyle, Jane	Boyle, Roxanne	Boyle, Ryan	Boyles, Steven	Boylston, Sandra
Boyne, Jonathan	Boynton, Elizabeth	Boynton, Elizabeth	Bozarth, Clare	Bozdere, Levent	Bozowski, chris
Brace, Stephen	Brachel, Tiana	Brachman, Phyllis	Bracken, Denis	Bracken, Rhonda	Bradford, Andrew
Bradford, Jennifer	Bradford, Leslie	Bradford, Leslie	Bradley, Anne	Bradley, Kathy	Bradley, Margaret
Bradley, Rhonda	Bradley, Steve	Bradly, Edward	Bradshaw, Barbara	Bradshaw, Beverly	Bradshaw, Elizabeth
Bradstreet, Carol	Brady, Margaret	Braglia, Morena	Brainerd, Tim	Braio, F.	Braithwaite, Melanie
Braithwaite, Ruth	Braman, Gary	Bramen, Elaine	Bramlage, Laurie	Bramlett, Larry	Branch, Keri
Brand, Dennis	Brand, Jackson	Brande, Kaili	Brandes, Mr. Richard	Brandler, Barbara	Brando, Marge
Brandon, Sara	Brandt, Marie	Brandt, Mogens	Brandt, Patti	Brandt, Vera	Braney, Mary Louise
Brannigan, Kelly	Branscombe, Dwight	Brant, Daniel	Brant, Karen	Braoudakis, Spyros	Brashear, Logan
Brassard, Deborah	Brassel, S	Braswell, Ann	Brath, Helmut	Bratton, Katherine	Brauer, Sister Joan
Brault, Micheline	Braun, Joan	Braunstein, Kate	Braunstein, Kenneth	Braunwart, Tod	Braut, Heather
Bravo, Karen	Brawner, Debbie	Bray, Angie	Bray, Ed	Bray, Linda	Brazeau, Theodore
Brazil, Diane	Brazy, Deena	Breakstone, Kay	Breakwell, Amy	Brechin, Vernon	Breda, Bo
Brede, Margaret	Breed, David	Breed, David	Breeden, Robert	Breese, Cheryl	Bregger, Joan
Breglia, Erin	Breiby, John	Breitenbach, Mary Louise M.	Bremer, John	Bremmer, Cheli	Bremner, Debbie
Bremner, Steve	Brems, Richard A	Breneman, Dr Michael	Brennan, Brigadier General Rev.John P	Brennan, Matthew	Brennan, Peter
Brenneman, Don	Brenneman, Mary Beth	Brenner, Claire	Brenner, Jared	Brenner, Lise	Brent, Martin
Brentlinger, Kathleen	Brenza, Dr. Tina	Bresciani, Marchelo	Breslau, Esther	Breslau, Esther	Bretherton, Gareth
brewer, ginger	brewer, ginger	Brewer, John	Breza, Mr. Steve	Breza, Virginia	Bricic, Jasmina
brickner, marvn	Bridegroom, Phil	Bridenstine, Linda	Bridgeland, Rhea	Bridges, Denim	Bridges, Linda
Bridges, Nikki	Bridgett, Nicholas	Briere, James	Brigandi, Joseph	Briggs, Edythe	Briggs, Julia
Briggs, Keri	Briggs, Tj	Brigham, Rick	Bright, Arthur	Bright, Fionna	Bright, Lori
Bright, Mary	Brillet, Matthieu	Brimer, Ingrid	Brincka, Frank A.	Brinda, Valery	Brinker, Erica
Brinkley, John	Brinklow, Tina	Brinkmann, Patricia	BRINSON, KENNETH	Briones, Patricia	Brisbin, MaryEllen
Brisco, Alice	Bristol, Joan	Bristow, Mary	Britt, Santi	Brittain, Donald	Britton, Marilyn
Britton-Mehlisch, Scott	Broad, Julia	Brochhagen, Ann	Brocious, Pam	Brock, Caryn	Brocklebank, Sue
Brocklin, Matthew Van	Brockman, Hiloah	Brockman, Sarah	Brockway, Barbara	Brodell, R.	Broderick, Michael
Brodigan, Patrick	Brodnax, David Brodnax	Broecker, Burkhard	Broer-LeRoux, David	Brokaw, Dennis	broll, carol
brombach, beth	Brommel, Alan	Brondino, Michael	Brook, Susan	Brooker, Gary	Brooker, Mark
Brookes, Paula	Brookins, Lura	Brookman, P	Brooks, Barbara	Brooks, Carol	Brooks, Dorothy Lynn
Brooks, Elizabeth	Brooks, Kendra	Brooks, Kyle	Brooks, Paul	Brooks, Susan	Brooks-Fetty, Cynthia
Broome, Claire	brophy, michele	Brophy, Tracy	Broski, Jay	Bross, CT	Brothers, Brian
Brotman, Charles	BROU, Rachelle	Broughton, Marilyn	Brouillette-Jobe, Sandra	Broviak, Remijio	Brow, Judith
Brown, Alan	Brown, Anna Marie	Brown, Barbara	Brown, Brandye	Brown, Caroline	Brown, Cecilia
Brown, Cheryl	brown, Christopher	Brown, Craig	Brown, Craig E	Brown, D	Brown, Damon
BROWN, DANIEL	Brown, Denise	Brown, Dick	Brown, Doug	Brown, Doug	Brown, Duncan
Brown, Edward	Brown, Gillian	Brown, Greg	Brown, Ian	Brown, Jeff	Brown, John
Brown, Julia	Brown, Katherine	Brown, Kathleen	Brown, Larry	Brown, Leo	Brown, leslie Danielle
Brown, Linda	Brown, Lisa	Brown, Melissa	Brown, Michael	Brown, Mike	Brown, Patricia
Brown, R	Brown, Rebecca	Brown, Rebecca	Brown, Robert	Brown, Robert	Brown, Robert M.
Brown, Roderick	Brown, Seth	Brown, Susan	Brown, Thomas	Brown, Tiffany	Brown, Tina

Brown, Traci	Brown, Vera	Brown, Vicki	Brown, William	Brown, Zack	Browne, David
Browne, Dennis	Browne, Kelsi	Brownell, Deirdre	Brownfield, Harry and Jill	Browning, Cassandra	Browning, John
Brownlee, Cathy	Brown-Ridley, Deborah	Brownton, Glenn	Broz, Janice	Brubaker, Sandy	Bruce, Christine
Bruce, Edie	Bruce, Linda	Bruce, Neville	Bruck, Timothy	Bruers, Stijn	Brumann, Joseph
Brumfield, Cort	Brumleve, Mr. Charles	Brumley, Ginni	Brummer, Veronica	Brummett, William	Brummette, Carrie
Brumwell, Keith	Brunelle, Paul	Brunger, Marilyn	Bruni, Janice	Brunje, Christopher	Brunner, Phil
Bruno, Joanne	Bruns, Carol	Bruns, Emlyn	Brunstrom, Keith	Brusen, John	Brushaber, Marcie
Brustman, Thomas	Bruton, Babette	Bryan, Bruce	Bryan, Candy	Bryan, David	Bryan, Mr. Jamie
Bryan, Pat	Bryant, Alexandra	Bryant, Anita	Bryant, Barbara	Bryant, Ben	Bryant, Cade
Bryant, Elizabeth	Bryant, Pam	Bryant, Virginia	Brydon, James	Brydon, Neil	Bryer, Gladys
Bryson, Kathleen	Bryson, Sarie	Brzezinski, Matt	bubenick, jack	Bucenieks, Petra	Buch, Charles
Buchan, Martha	Buchan, Martha	buchanan, betty	Buchanan, Bonnie	Buchanan, Carlin	Buchanan, Cheryl
Buchanan, Regina	buchanan, wendy	Bucher, Anne Marie Marie	Buchsbaum, Judy	Buck, Megan	Buckhout, Mike
Buckingham, Meg	Buckler, Deborah	Buckley, Chris	Buckley, Ms. Maura	buckley, nan	Buckley-Smith, Katherine
Buckman, Trent	Buckmaster, Malu	Buckmaster, Matthew	Buckner, Rachel	Buczyna, Linda	Buda, Sarah
BUDD, GEORGE	Budde, Sharon	Budinick, Lue Ellen	budoff, roslynn	budzinski, stephen	Buechel, Fazilee
Buechle, Alex	Buehler, Mrs. Lisa	bueno, christina	Buensuceso, Antonio	Buerger, Michelle	Buergermeister, Sabine
Bugbee, Michael	Buhowsky, Joe	Bui, Khoi	Bull, Cynthia	Bullard, David	Bullard, LF
Bulling, Larry	Bullock, Samia	Buluku, Fred	Bumgarner, James	Bumgarner, Judy	Bumpas, Linda
Bumpas, Linda	Bunch, Eugene	Bunderla, James	Bungarz, Kathleen	Bunge, Denise	Bunyard, Trish
Buoncora, Yvonne	Buoncristiani, Dianne M	Burak, Pauline	Burch, Jason	Burch, Karen	Burch, MaryAnn
Burch, Robert	Burchard, Ch	Burda, Heather Hamilton	Burdette, Susan W.	Burdick, Amanda	Buresh, Stephanie
Burford, Clayton	Burg, Matthew	Burgart, We	Burge, James	Burger, Bitsa	Burger, Melissa
Burger, Scott	Burgess, Barbara	Burgess, Ian	Burgess, LaShawn	Burgess, Melinda	Burgess, Wendy
Burghart, Barbara	Burgin, Holly	Burgoon, Larry	Burgos, Pablo	Burk, Robert	Burke, Bill
Burke, Bonnie Margay	Burke, Ed	Burke, Gene	Burke, Jack	Burke, Judith	Burke, Kathleen
Burke, Ken	Burke, Linda	Burke, Lyn	Burke, Mr. Paul	Burke, Patricia	Burke, Rod
Burke, Rod	Burke, Russell	Burkes, Sheyril	Burkes, Yael	Burket, Susan	Burkett, Paule
Burkey, Bruce	Burkhart, Don	Burks, Jamie	Burks, Jess	Burlage, Richard	Burlew, Jessica
Burnash, George	Burnett, Alexandra	Burnett, Billy	burnett, d	Burnham, Bob e	Burnham, Daniel
Burns, Bruce	Burns, Charles Joseph	Burns, Charlie	Burns, Gail	Burns, Ian	Burns, John
Burns, Karolyn	Burns, Kathryn	Burns, Laurel	Burns, Lyn	Burns, Sean	Burns, Stephen A
burnup, debbie	Burr, Deborah	Burr, Douglas	Burr, Jennifer	Burridge, John	Burris, Judy
Burrows, Ariana	Burrows, Ben	Burson, Ms. Grace	Burson, Sandra	Burt, John	Burt, Judith
Burt, Kirsten	Burt, Linda	Burt, Susan	Burt, Susan	Burtis, Susanne	Burton, David
Burton, Jane	Burton, Mr. Vic	Burton, Pat	Busby, Michael	Bush, Don and Leslie	Bush, Rachel
Bush, Veronica	Bush, William	Bushaw, Mike	Bushey, Brian	Bushnell, Cynthia	Bushroe, Richard
Bushur, Mary	Bushway, Cindy	Buslot, Chantal	Busterna, Rosemary	Bustos, Ray	Butenschoen, Van
Butkiewicz, Mike	Butler (geologist), Dr. William	Butler, Amber	Butler, Amber	Butler, David	Butler, David AND Carol
Butler, Donald Lee	Butler, Dottie	Butler, Edward	Butler, Francis	Butler, Gilbert	Butler, Helen
Butler, Jane	Butler, Kathleen	Butler, Kim G	Butler, Matthew	Butler, Michael	Butler, Sam
Buttaccio, Paul	Butterfield, Doris	Buttles, Kathryn	Butts, Franklyn	Butts, Scott	Buxbaum, Doris
BVD, J	Byars, Joanne	Byerley, Jay	byers, sharon	Byland, John	bynum, leanne
Bynum, Vicki	Byrd, Craig	Byrd, Darlene	Byrd, James	Byrd, Joan	Byrne, Nick
Bywaters, Lynn	c, a	C, Carolyn	C, Cathy	C, Debby	C, Elaine
C, Elena	C, Janet	C, Jim	C, Joe	C, Joe	c, k
C, Max	C, Michael	c, rich	C, Sylvie	C, W	C., Laurie

C., Lynne	C., Michel	Caan, Julie	Caballero, Nicolas	Cabe, John	Cacciotti, Tasha
Cachola, Ben	Cade, Tina	Cadwallader, Roger	Cady, Deborah	Cady, Ellen	Caetano, Mike
cafarelli, cenie	Caffery, Susan	Caffrey, Cathleen	Cahill, Greg	Cahill, Janel	Cahill, Karen
Cahill, Lea	Cail, Bonnie	Caillouette, Brook	Cain, Joseph	Caine, Deidra	Caine, Liz
Cairns, Rachel	caissie, angie	Calabrese, Tasmara	Calabro, Amber	Calabro, Edward	Calambro, Leslie
Calame, Jane	Calamia, Cathy	Calderon, Edye	Caldwell, David	Caldwell, Dotty	Caldwell, Edwina
Caldwell, Jennifer	Caldwell, Joel	Caldwell, Kaci	Caldwell, Ms. Alecto	Caldwell, Robert	Caldwell, Susan
Caldwell, Tiffany	Calender, Steven	Calhoun, Mr. Charles	Cali, Judy	Cali, Ms. Lee M	Caliendo, Rosalie
Callahan, Amalie	Callahan, Ms. Sharon	Callahan, Sharon	Callan, Michael	Callanan, Vivian	Callaway, Michael
Calleja, Marta	Calleja, Marta	Callentine, Joetta	Calloway, Brenda	calvert, chris	Calvert, Chris
Calvillo, Max	Calvinperez, Martha	Camden, Cherie'	Cameron, Aurora	Cameron, Cami	Cameron, Catherine
Cameron, Don	Cameron, Gloria	Cameron, Jean	Cameron, Mr. Paul	Camero-Sulak, Adrianne	Camp, Michael
Campanini, Susan	Campbell, Albert	Campbell, Allan	Campbell, Art	Campbell, Barbara	Campbell, Jacqueline
Campbell, Judy	Campbell, Kathleen	CAMPBELL, MARYANNE	Campbell, Mr. Blair	Campbell, Nancy	Campbell, Rosie
Campbell, Steve	Campbell, Susan	Campbell, Terry	Campbell, Theresa M>.	Campion, Mary Ellen	Campisi, Erick
Canada II, Riley	Canaday, Mara	Canales, Cecilia	Candela, Jackie	Candela, Macyle	Candelaria, Gene
Candio, Ruth	candlin, celia	Canham, Stephen	Cann, Cj	Canning, Ernest	Canning, Rick
Canning, Thomas	Cannizzaro, C.L.	Cannon, Dale	Cannon, Dr. Maxine	Cannon, Steve	Cannon, Thomas
Cannon, William	cano, artha	Cano, Elizabeth	Cano, Paula	Canosa, Mariateresa	Canright, Rebecca
Cant, John	Cantalupo, Olivia	Cantey, James	Cantin, Nathalie	Canton, Rafael	Cantori, Juha
Cantrell, Derinda	Cantu, Eva	Cantu, Roel	Canyonrivers, Pamela	Capasso, Bill	Capdepont, Maria
Cape, Lawrence	Caplan, Jay	Caplin, Marilyn	Capotorto, Mrs. Jeanette	Capparrille, Norma	Capponi, Argia
Cappuccio, Sharon	Capshaw, Anita	capshaw, teri	capurro, lyn	Caputo, Renee	Caputo, Sara
Capwell, Deborah	caqmpbell, john	Caraballo, Patricia	Caracci, Gina	Caramico, Jason	Caraoue, Nicole
Carbia, Vanessa	Carbine, Beth	Carbone, Chris	Cardell, Steve	Carden, Ben	Cardinal, Ms. Enid
Cardinal, Richard	Cardona, Rodolfo	Cardone, Mrs. Bethany	Cardoso, Pablo	Cardoso, Patricia	Carducci, Giulia
Cardwell, Stephen	Carella, Len	Carella, Len	Carey, Kathy	Carey, Madalynn	Carey, Patricia
Carey, Susan	Carey, Tehan	Cargman, Jered	cargulia, guy	Carl, Nancy L	Carl, Renee
Carli, Alice	Carlin, Marianne	Carlin, Star	Carlisle, Ann	Carlon, Michael	Carlson, Carol
Carlson, Cliff	Carlson, Dorothy	Carlson, Joan	Carlson, Karen	Carlson, Ron	Carlson, Vanessa
Carlson, W H	Carmean, Ingrid	Carmichael, Erin	carmichael, john	Carmichael, Lynne	Carnahan, Florence
Carnahan, Glenn	Carnevale, Robert	Carney, Cheryl	Carney, KC	Carney, Michael	Caro, Joan
Carodiskey-Wiebe, Jenna	Carolan, Daniel	Caron, Charles	carozza, joseph	Carpenter, Anpeo	Carpenter, Dale
Carpenter, Dan	Carpenter, John	Carpenter, John	Carpenter, John	Carpenter, Kathryn	Carpenter, Marshall
CARPENTER, MICHAEL	CARPENTER, MICHAEL	Carpenter, Nate	Carpenter, Patrick	Carpenter, Robert	Carpenter, Steven
Carpenter, Tasha	Carr, Beth	Carr, Caryl	Carr, Chris	Carr, D	Carr, Karen
Carr, M.D., Dr. Donna	Carr, Michelle	Carr, Peter	Carr, Richard	Carr, Sandra	Carr, Walt
Carr, Wayne	Carrabba, Cheryl	Carrell, Nadia	Carrick, Thomas	Carrigan, Milton	Carringer, Nancy
Carrington, Denise	Carrington, Martha	Carritte, David	Carroll, Bill	Carroll, Cassie	Carroll, Cassie
Carroll, Dr. Linda	Carroll, Elizabeth	Carroll, Jan	Carroll, John	Carroll, Kevin	Carroll, Laura
Carroll, Linda	Carroll, Nathan	Carroll, Niall	Carroll, Patricia	Carroll, Rebecca	Carroll, Sara
carroll, steve	Carroll-Gavula, John	Carroux, Charles	Carse, A. Mervyn & Marilyn L	Carsey, Susan	Carson, Howard
Carson, Robert	Carswell, Donna	Carter, Candiss	Carter, Dr. Catherine Ph.D	Carter, Ginger	Carter, Jeremy
Carter, Judy	Carter, Kimm	Carter, Marcia	Carter, Ms. Natalie A.	Carter, Pamela	Carter, Ruth
Carter, Ryan	Carter, Sandy	Carter, Veronica	Carter, W.R.	Carter, Walter	Cartwright, Gail
Caruso, Rosemary	Caruso, Stephen and Connie	Caruso, Thomas	carvajal, mauricio	Casale, Andrea	Casamento, Leslie
Casanueva, Carolina	Casares, Cayla	Cascio, Gregory	Case, Austin	Casey, Cristina	Casey, Cynthia

Casey, Kirk	Casey, Nancy	casler, michael	Caso, Mark	Casper, Chris	Casper, John C
Casserly, John	Cassidy, Joy	Cassidy, Laurie	Cassidy, Leslie A	Cassidy, Mr. T	Cassim, Naseem
Cassinelli, Pete	Casstevens, Rebecca	Castaline, Ms. Myrna	Castaneda, Olga	Castano, Maria D.	Castelli-Hill, Susan
Castellini, Andrew	Casten, Liane	Castilleja, Rebecca	Castillo, Anthony	Castle, Allison	Castle, Allison
Castle, Bobbie	Castle, William	Castonguay, Dany	Castriota, Yvonne	Castro, Carlos	Castro, Carlos
Castro, Grey	Castruita, Larry	Caswell, Gail	Cate, Deborah	Cate, Tom	Cathala, Lorraine
Cathcart, Melissa	Catlin, Linda	Catt, Shannon	Cattell, Mrs. June	Caudill, Larry T	Caudill, Lindsey
Caudill, Ron	Caughman, Erin	Causey-Jeffery, Tracy	Cauton, Trevecca	Cavaliero, Robert	Cavallaro, Lenny
Cavanaugh, Elaine	Cavanaugh, Kathryn	Cavanaugh, Tim	Cavell, Melissa	Cavey, Michele	Cavoto, Frank
Cawthra, William	Caya, Jamie	Cease, Jane	Ceaser, Rosemarie	Cecchi, Zephyr	Cecere, Jerry
cecil, jan	Cedeno, Maria	Cederholm, Mark	Cefola, Elaine	Cejas, Tara	Celeste, Robert
Cellini, Dorothy	Cellmer, Alexander	Cellucci, Mary	Celt, Artemis	centineo, christine	Cerier, Leslie
Cermak, Sheryl	Cernak, Mary Ann	cerny, sue	Cerrone, Jane	Cervene, Amy	Cervenka, Kevin
Cervera, Isabel	Cervi, Richard	Cesar, Carlos Eduardo Sikorski Cerqueir	Cespedes, Ms. Melinda	Cessna, Stephen	cevasco, Mr. john
Chacko, Roy	Chaffin, Catherine	Chaffins, Sheila	Chaiken, Deborah	Chalakode, Aditya K	Chalfin, D.
Chalifour, Helena	Chalker, Mikki	Chalker, Mikki	Challenger, Nanette	Challinor, Glyn	Chaloupka, Amy
Chambadal, Philippe	Chamberlain, Adrienne	Chamberlain, Christelle	Chamberlain, Kim	Chamberlain, Royal	Chamberlin, Linda
Chambers, Becky	Chambers, Leland	Chambers, M	Chambers, Megan	Chambers, Pat	Chambliss, Shaula
Champion, S	Chan, B.	Chan, Sampson	Chan, Shurli	Chance, Betty	Chance, Katherine
Chance, Sherry	Chandl, Shirley	Chandler, Krystle	Chandler-Stahl, Christie	Chandley, Joan	Chanen, Philip
Chang, Deborah	Chang, Gabriel	Chang, Mrs. Patricia	Chang, Rebecca	Chang, Sharon	Chao, Agnes
Chao, Agnes	Chao, Agnes	Chapellier, Nancy	Chapin, Anne	Chapin, Heather	Chaplain, Hilary
Chapman, Alexander	chapman, clifford	Chapman, Hellene	Chapman, Jeff	Chapman, Sam	Chapman, Zoe
Chapman, Zoe	Chappelle, Noryne	Chapple, Evelyn	Charbonneau, Aimee	charbonneau, john	Chard, Sue
Charkowski, Ed	Charland, Robert	Charlebois, Stacie	Charles, Cassia	Charles, Samantha	Charlestein, Bruce
Charlier, Thomas	Charlton, Nancy	Charlton, Terry	Charlton, Terry	Charlwood, Peysha	Charman, Patsy
Charnas, Kevin	Charrier, JL	Charrier, Philippe	Charron, Anik	Chartier, Allen & Nancy	chase, clint
Chase, Debra	Chase, Elliot	Chase, Gladys	Chase, Janet	Chase, Joy Rosenberry	Chase, Laura
chase, michael	Chase, Sandy	Chase-Rockwell, Sandra	Chastain, Amy	Chasteen, Robert	Chatelain, Abigail
Chatham, Mary	Chaus, June	Chauvet, Hannah	Chavez, Barbara	Chavez, Brenna	Chavez, Dan
cheatham, william	Cheek, Deborah	Cheeks, Dwayne	Cheevers, Kathleen	Chelland, Ron	chellton, anna
Chemai, Beverly	chen, catherine	Chen, Tim	Chenaille, Kathy	Cheney, Paul	Cheng, Anne
Cheng, Chiu	Chenicek, Barbara	chenoweth, jamaica	Chenoweth, Joanne	Chenoweth, Mark	Cherdon, H
Chernetz, Kyle	Chernova, Eugene	Cherry, J. Howard	Cherry, Sandra	Chesrow, George	Chesterton, R
Chew, Caitlin	Chey, Sam	Cheyne, Tracy	Chia, Gina	Chieffe, Mary	Chilcoat, Rose
Childers, Jennifer	Childers, Randy	Childs, Henry	Childs, Peter	Chill, Deborah Lee	Chille, Annette
Chille, Annette	Chille, Annette	Chilton, Cindy	Chin, Janice	Chin, Jean	Ching, Pat
Chinisci, Michelle	Chinitz, Joan and Joel	Chin-Mancini, Karen	Chin-Onn, Kenneth	Chisari, Andrea	Chischilly, Jane
Chisholm, Holly	Chism, Gail	Chiu, Mr. Kevin	Chludzinski, Rose	Cho, T	Chockla, Bill
CHOI, ILENE	Choi, Kay	Choi, Mark	Cholak, EL	Chopra, Neetu	Chorvat, George
Chou, P	Chowdhry, Carol	Choy, Mel Cup	Christ, Starte	Christensen, Danielle	Christensen, James
Christensen, K.	Christensen, Twila	Christenson, Ms. Amy	Christian, Karen	Christian, Steve	Christian, Steve
Christiano, Jennifer	Christianson, Alan	Christianson, Mary Anne	Christie, Marie-Jeanne	Christine, Joel	Christini, Tony
Christini, Tony	Christlieb, Kenneth W	Christman, Gilbert	Christmas, Katharine	Christoffersen, Morten	christopher, sandra

Christwitz, Barbara	Chromey, Tina	Chryst, Joan	Chu, Jonathan	Chuka, Paula	Chum, Cristina
Chun, Grace	Church, Melanie	Churchill, RBrian	Churella, Susan	Chyburayev, Sergey	Ciaccio, Brandon
Ciatti, Roxanne	Cibery, John	Cicchi, Carla	Cierech, Thomas	Ciesielski, J.b.	Cifelli, Laura
Ciliberti, Molly	Cilley, Rachel	Cinquigranno, Harold	Ciolli, Diana	Cionco, Eleanor	cipolla, patricia
Cippel, Maureen	CirilloMarcus, Jeannr	Cirulnick, Paul	Cissell, Jerry	Ciucu, Cristina	Civgin, Sarah
Ckark, Portia	claire, h	Clanon, Jeff	Clapp, Shelly	Clapper, David	Clarida, Fran
Clark Jr, James A	Clark, Alexander	Clark, Amanda	Clark, Anne	Clark, Barbara	Clark, Betty
Clark, Carole	Clark, Chris	CLARK, DIANE J.	Clark, Donna	Clark, J	Clark, J
Clark, JackJack	Clark, James	Clark, Joe	Clark, Joyce	Clark, Julie	Clark, Karen
Clark, Lewis	Clark, Marilyn	Clark, Meg	Clark, Mr. Donald	Clark, Mr. Morgan	Clark, Mrs. Diane
Clark, Nancy	Clark, P	Clark, PJ	Clark, Rebecca	Clark, Robert	Clark, Stephanie
Clark, Stephanie	Clark, Stephanie	Clark, Sueanne	Clark, Susan	Clark, Susan Leilani	Clark, Theresa
Clark, Todd	clark, valerie	Clark, Warren	Clarke, Darrell	Clarke, James	Clarke, Len
Clarke, Michael and Jeanine	Clarke, Olga	Clarke, William	Clarkl, Dr.Milton	Clarkl, Dr.Milton	Clark-McKitrick, Blythe
Clark-Murphy, Roxane	Clasemann, Joel	Clatworthy, Thomas	Claunch-Meyers, Jennifer	Claus, Ms. Carol	clausen, nina
clausen, nina	Claussen, Janice	Clavarino, Michael	clawson, jay	Clay, Gretchen	Clay, Yolanda
Claypool, Sharon	Clayton, Ronald	Claytor, Patricia	Cleary, Colleen	Cleary, Deanna	Cleaveland, Malcolm
Cleef, Ms. Marjorie Van	Cleek, James	Clegg, Toby	Clemens, Beatrice	Clement, Gail	Clement, James
Clements, Jeannie	Clemons, Lisa	Clerke, Greg	Cleva, Elise	Clewett, Barbara	Clifford, Ms. Ruth
Clifford, Rory	Clifton, Catherine	Clifton, Joy	Cline, Rev. L.	Cline, William	Clinton, R
Clinton, R	Clinton, Richard	Clisson, Marjorie	Clodi, Roseann	Clontz, Jack	Cloonan, John
Close, Billie	Close-Battoe, Marilyn	Cloud, Whitney	Clough, Lany	Clough, Richard	Clover, Cecile
Clower, Rhonda D	clukey, charlene	Clunas, Michael	Clutter, Kevin	Clymer, Lois	Coahran, Scott
Coakley, John Paul	Coats, Ann	Coats, Gary	cobb, robert	Cobb, Sandra	Cobb, Willa
Cobbum, Garry	Cochran, Jill	Cochran, Michael	Cochrane, Wayne	Coco, Joe	Codding, Don
Coderoni, Shane	Codes, Samantha	CODISPOTI, FRANK	Cody, Dannys	Cody, William	Coe, Daniel
Coe, Skye	Coe, Thomas	Coelho, Craig	Coen, Gary	Coffee, Thomas	Coffey, Richard
Coffey, Rotraud	Coffey, Rotraud	Coffin, Doug	Coffin, Doug	Coffin, Kimberly	Coffman, Jeremy
Coffman, Kathleen	Coffman, Lisa	Coggins, Susan	COHEN MD, ROBERT M	Cohen MD, Sue	Cohen, Ann
Cohen, Benita	Cohen, Eleanor D	Cohen, Holly	Cohen, Isabel	Cohen, Jake	Cohen, Judy
cohen, marilyn	Cohen, Marilyn	Cohen, Marion	Cohen, Ms. Theresa	Cohen, Paula	Cohen, Rachel
Cohen, Rajal	Cohen, Sharon	Cohen, Wendi	Cohen-Sieg, Miya	Cohler, Ellen	Cohn, Barbara
Cohn, Barbara	Coiro, Christina	Colafranceschi, Tina	Colando, Joseph	Colando, Joseph	Colby, Faulder
Colby, Hillary	Colden, Bradley	Coldwell, Sherilyn	Cole, Ardith	Cole, Bruce	Cole, Carol A.
Cole, Carole Ann	Cole, Joan	Cole, Kathleen	Cole, Kent	Cole, Linc	Cole, Maureen
Cole, Michelle	Cole, Mr. Cal	Cole, Penelope	Cole, Sandra	Cole, Susan	Colee, Andy
Coleman, Barbara	Coleman, Ellis	Coleman, Henry	Coleman, Jeffrey	Coleman, Jim	Coleman, Seaghan
Coleman, Sophia	Coles, Christopher	Coles, Dean	Colichia, Davette	Colinsworth, Jeff	Colletto, Andrew
Collier, Caitlin	Collier, Cary	Collier, Rosalind	Colligan, Carol	Collin, Michel	Collins Jr, Dr. Paul
Collins, 3rd, Charles	Collins, Amanda	Collins, Audrey	Collins, Carol	Collins, Dave	Collins, Elsie
collins, gerry	Collins, Greg	Collins, Jane	Collins, Jeffrey	Collins, Joseph	Collins, Kathy
Collins, Kirsten	Collins, Kristy	Collins, Laura	collins, lu	Collins, Lyle	Collins, Mallory
Collins, Peggy S.	Collins, Shirley	Collins, Teresa	Collinson, Katherine	Collmer, Sarah	Collord, Pamela
Collver, Sharon	Collyer, Rachael	Colombo, Kathleen	Colon, Victor	Colony, Professor	Colpas, Marcie
Colquitt, Millie	Colston, Laura	Colton, Cammy	Colton, Joe	Colton, Sara	Colton, Sara
Colucci, mrs Sue	Colvin, Felicia	Colvin, Rev	Colwill, Kathleen	Comay, Josh	Combes, Joan
Combs, Betty	Combs, Leslie	Comella, John	Comer, Charles	Comerford, Jane Ann	Comerford, Tom

Comfort, Lisa	Compangone, Ariane	Comune, Mike	Conant, Deb	Conant, Rhyda	Conard, Linc
Conatser, Mike	Conaway, Carol	Conaway, Carson C.	Conelley, B.	Cones, Sandy	Congdon, Michael
Conger, Barbara D.	Conger, Rex	Conkey, Jason	Conklin, Crystal	Conklin, Lindsay	Conklin, LuMarion
Conkrite, Karina	Conlan, Elizabeth	Conlan, Mike	Conley, Chris	Conn, Sharon	Connell, Brendan
Connelly, Daniel	Connelly, Patricia	Connet, Carole	Connick, Cherie	Connolly, Anna	Connolly, Charles
Connolly, J.Patricia	Connolly, Jackie	Connolly, James	Connolly, Steven	Connor, Arthur	Connor, David
connors, peggy	Conoscenti, Paula	Conrad, Carole	Conrad, John	Conrad, Kathryn	Conrad, Len
Conrad, Lori	Conrad, Marc	Conroy, Beverly	Conroy, Jim	Conroy, Peggy	Conrriquez, Esther
Constantino, James	Conti, Anthony	Conti, Joanne	Conti, John	Conti, John	Contreras, Cristian
Contreras, John	Contreras, Juan	Contreras, William	Converse, Barbara	Converse, E. Blaine	Conway, Clayton
Conway, William	Conwell, Lynne	Conyers, Laurinda	Cook, Carol	Cook, Charlotte	Cook, Charlotte
Cook, Debra	cook, e	Cook, Hilary	Cook, Robert	Cook, Susan	Cooke, Bradley
Cooke, Douglas	Cooke, Ki	Cooksey, Gaia	Cooksey, Keith	Cooley, Adam	Cooley, David
Cooley, Florence	Cooley, Ms. Marian	Cooney, Anne	Cooney, Sher	Cooper, Alvin	Cooper, Edith
Cooper, Ken	Cooper, Lenora	Cooper, Margo	Cooper, Richard	Cooper, Ruth	Cooper, Sandra
Cooper, Sandra	Cooper, Sylvia	Cooper, Sylvia	cooper, trina	Coots, Jim	Cope, Peggy
Cope, Sandra	Cope, Thomas	Cope, William	Copelan, Pamela	Copeland, Jeanette	Copeland, Julia
Copeland, Sue	Copenhaver, Patricia	Coppage, Judith	Coppock, Phil	Coppock-Bunce, Alex	Coppotelli, Heide Catherina
Copps, Carlann	Corbett, Patty	Corbin, Sean	Corbitt, Jeannie	Corby, Kathleen	Cordeiro, Brock
Cordon, Pamela	Cordova, Berenice	corey, bonnie	Corey, Sheffield	Coria, Ana	Corkey, Peter
Corlett, Philip	Corley, Bert	Cormons, Grace	Cornelia, Jared	Cornelius, Margaret	Cornell, Debbie
Cornell, Denice	Cornell, Joanne	Cornelsen, Christy	Cornely, John	Cornish, Heather	Cornish, John
Cornish, Megan	Cornish, Pamela	Cornwell, Ed	Cornwell, Susan	Corona, Mrs. Marianne	Corr, F
Corradini, Pamela	Corrigan, James	Corrigan, Sean	Corser, Christina	Corson, Madeleine	Cort, John
Cortes, Elvira	Cortez, Arizona	Cortez, Linda	Corwin, Cecil	Corzo, Cara	Corzo, Cara
Corzo, Hector	Cosentino, Debra	Cosgrove, Pamela	Cossutta, Renee	Costa, Joan	Costa, Lynn
Costa, Maxine	Costa, Stephanie	Costello, Suzy	Costello, Timothy	Costello-Kruzich, Liz	Costion, Steve
costley, dee	Cote, Diane	Cote, Don	Cote, Katherine	Côté, Sylvain-Paul	Cote, Tabitha
Cothern, Kristin	Cottle, Jenny	Cotto, Luis A. Merced	Cotton, Christine	Cottrell, Larsen	Cottrell, Lauren
Cottrell, R	Cottrill, Scott	Cotts RN BSN, Ms. Virginia	Cotz, elina	Couch, Deloma	Couch, Georgia
Couch, Miss Sandra	Couden, Sara	Couis, Dimitra	Coulehan, Jack	Coulon, Sandrine	Council, Ms. Nina
Counihan, Mary	Counterman, Jesse	Courtaway, Robbi	Courter, Linda	Courtney, Courtney	Courtney, Donald
Courtright, Mrs. Nancy	Courtright, Mrs. Nancy	Courtright, Sally	Courtsal, Lyle	Cousino, Joyce	Cousins, Stirling
Covell, Sandi	Covello, Ms. Suzanne	Cover, Greg	Covey, Alan	Covington, Diana	Covington, Gaya
Cowan, Diana	Cowan, Jan	Cowen, Dave	Cowen, Karen	Cowger, Charles	Cowger, Ms. Nancy L L
Cowin, Caryn	Cowles, Nicholas	Cowles, Nicholas	Cowles, Traver	Cowling, Katie	Cox, Chris
Cox, CW	Cox, Kathleen	Cox, Kim	Cox, Louis	Cox, Michael	Cox, Mrs. Vita
Cox, Ron	Cox, Susan	Cox, Thomas	Coyle, Andrew	Coyle, John	Coyne, Margaret
Coyote, Jade	Cozad, Bren	Cozad, Leslie	Cozart, Erin	Cozza, Laurrie	Cozzarelli, Laura
Cozzi, Steven	CPA, Linda Redding	Crabb, Thereasa	Crabtree, Larry	craciun, george	Craddock, Anne
Crady, Gail	Craig, Elizabeth	Craig, Ella	Craig, Heidi	Craig, Laura	Craig, Melissa
Craig, Sallyanne	Craig, Vernon	Crain, Jovon	Crain, Wanda	Cramer, Linda	cramer, marta
Cramer, Pamela	Cramer, Zachary	Crandall, AnaLisa	Crane, Donna	Crane, Kimberly	Crane, Marcella
Crane, Matthew	Crane, Susan	Cranker, Joy	Cranmer, Julia	Crannell, Raymond	Crapuche, Geraldine
Craun, Laura	Craven, Cheryl	Craven, Ron	Craven, Ron	Crawford, Daniel	Crawford, Glenn
Crawford, James	Crawford, Jason	Crawford, Kellie	Crawford, Randy	Crawford, Tracy	Crawshaw, Steve

Craychee, Patricia	crayne, candy	Creditor, Michael-Leonard	Creech, Jeff	Creech, Lynda	Creel, Randy and Susan
Creighton, Andrew	Creighton, Mr. Mark	Creighton, Sheilagh	Cremer, Matthew	Cremin, Gayla	Crick, Jane
Crider, Nancy	Crimmins, Margaret	Crimmins, Nancy	Crinnian, Donna	Cripps, Mr. Phillip	Criscuola, Patricia
Critser, Jackie	Critser, Jackie	Crittendon, Barbara	Crittendon, Barbara	Croan, Stacy	Croasdale, Kathlene
Crockett, Bridgette	Crockett, Scott	Croes, Maria	Croft, Keith	Crofut, Anni	Crommett, Jennifer
Cromwick, William	Cronas, Peter	Crone, Bob	Crone, Em	Cronin, Brian	Cronin, Donald
Cronin, Gary	Cronin, Nora	Crook, Dustin	Crook, Paula	Cropper, Alisha	Crosby, Debbie
Crosetto, Aaron	Cross, Ms. Heather	Cross, Nancy	Cross, Russ	Cross, Skip	Cross, Victoria
Croteau, Diane	Crotwell, Kathleen	Crouch, David	Crouse, Christopher	Crouse, Gray	Crouter, Norman
Crowden, James	Crowder, Rebecca	Crowe, Sheila	Crowell, George	Crowell, John	Crowley, Kate
Crowley, Marty	Crowley, Michael	Crowley, Susan	Crown, Deborah	Crownover, Terry	Crowther, Matthew
Croxton, Jesse	Crozier, John	Crozier, Mary	Cruder, Robert	Crum, Jennifer	Crumble, Leuise
Crumpacker, Barb	Crutchfield, Gemma	Cruz, Lynne	Cruz, Marian	Cruz, Rui	Cruz, William
Crystal, Lakota	Crystal, Lakota	Csenge, Debra	Ct, J	Cuadra, Jennifer	Cuadrado, Lola
Cuddington, Michael	Cueto, Connie	Cueto, Maria	Cuff, Janet	Cuff, Mr. Kermit	Culbert, Laurette
Culhane, Lesley Pamela	Cullen, David	Cullen, Mark	Cullen, Sarah	Culley, Emmett	Culp, Wendy
Culver, Bruce	Cumings, Dawn	CUMMINGS, BRIAN	Cummings, James	Cummings, Laura	Cummins, Peter
Cune, Mrs. Bonnie Mc	Cunha, Carlos	Cunha, Taryn	Cunningham, Alan	Cunningham, Jan	Cunningham, Jennifer
Cunningham, Jill	Cunningham, Joy	Cunningham, Linda Kay	Cunningham, Lorna	Cunningham, Marsha	Cunningham, Mary Jean
Cunningham, Ms. Debra	Cunningham, Storm	Cunningham, Wendy	Cupito, Caia	Cupp, Daniel	Cupp, Ellen
Cureton, Robert	Curl, Tim	Curley, June	Curlis, Mike	Curow, Jerry	Curp, Richard
Curran, Barbette	Curran, Barry	Curry, Mr. Timothy	Curry, Tierra	Curtin, John	Curtin, Kevin
Curtin, Linda	Curtis, Anne	Curtis, Cathy	Curtis, Colleen	Curtis, Connie	Curtis, Linda
Curtis, Walter	Curtler III, Hugh	Cushing, Patsy	Cutler, Annalisa	Cutler, Barry	Cutler, Keith
Cutright, Sara	Cutschall, Acadia	Cutshaw, Christian	Cutting-Brady, Joanna	Cutts, Bruce	cutts, matt
Cu-Unjieng, Andrew	Cwang, Ron	Cwang, Ron	Cybulski, Stephanie	Cybulski, Stephanie	Cynowa, Laura
Cypher, Steven	Czajkowski, C F	Czarnecki, Wendy	Czerniak, Jim	Czykieta, Zygmunt	D, A
D, A	D, A	D, Andie	D, April	D, Claire	D, E
d, h	D, Jamie	D, Laura	D, Liz	D, M	D, Mason
D, N	d, s	D, William	D., Wendy	da Silva, Stephanie	da Silva, Thiago
Daane, Donna	Dace, Letitia	d'Addio, Michael	Dadgari, Joseph	dadvand, javad	Dafesh, Kevin
Daggett, Susan	Dagon, Russell	D'aguiar, Stacy	Dahl, Stephen	Dahl, Thomas	Dahlen, Beverly
Dahlgren, Deborah	Dahlgren, PhD, Mr. Shelley D.	Dahlmann, Nick J.	Dahlquist, Abby	Dahlstrom, D	Dahmer, Karen
Daigneaux, Sandra	Dail, Simone	Dailey, Joe	Dailey, Susan	Daily, G Allen	Dains, Olivia
Dakouzlian, Marge	Dálaigh, Rónán Ó	Dalcais, Sandy	Dale, Barbara and Jim	Dalecky, Gary	Dale-LeWinter, Marcia
D'Alessandro, Keith	DAlessio, Ms. Traci	Daley, Bridget	Daley, Darren	Daley, Michael	Daley, Mick
Dalinowski, M Kimberly	Dalition, Mitch	Dallin, Eric	Dallis, Dimitris	Dallmayr, Dominique	Dallwitz, Ann
Dalo, Bern	Dalton, Jann	Dalton, John	Dalton, Lee	Dalton, Mary Ann	Dalton, Stephanie
Daly, Gail	Daly, Imelda	Daly, John	DALY, LINDA	Daly, Nancy	Daly, Nancy
Daly, Nancy	Dalzell, Amy	Dalzell, Gerald	DAmario, Ronnie	D'Amato, Paul	D'ambrosia, Dominic
d'amour, roland	Dan, Rev.	Dan, Rev.	Dana, Krista	Danaher, Rafael	Danby, Diane
Dancingwolf, Karlene	Dane, William	Danhauer, Mary	Daniel, Al	Daniel, Jonathan	Daniel, Kian
Daniele, Reni	Daniell, Lawrence	Daniell, Lawrence	Danielle, Sevrette	Daniels, Bobbie	Daniels, Brad

Daniels, David	Daniels, Elizabeth	Daniels, Elliot	Daniels, Joan	Daniels, Mel	Daniels, Mr. Michael
Daniels, Patricia	Daniel-Seabolt, Darla	Daniels-Lee, David	Danielson, Ms. Amy	Dann, Janet	Danne, Chris
Dannert, Frank	D'Annunzio, Patrick	Dante, Colette	D'Antonio, Joanne	Daraio, Joseph	Darby, Catie
Darby, Richard	Darby, Richard	Darcy, Kevin	Dardar, Mazie	Darga, Kellyann	Daria, Lynette
Darling, Carrie	Darling, Michael James	Darr, Ms. Allie	Darr-Hall, Jamie	Darst, Caroline	Darweesh, Suzanne
Das, Ms. Anita	Das, N	dashe, julia	Daskal, Sharon	Dassing, Dwayne	Dastur, Burjor
Dato, Gail	Daub, Mary	Dauel, Peter	Daugherty, Amy	Daugherty, Charlie	Dauginas, Kelly
Daurte, Leo	DAvanzo, Alan	daveiga, michael	Davenport, Donna	Davenport, Paul	Daversa, Frank
Davey, Cinthia	Davey, Marilyn	Davey, Thomas	Daviau, Kathie	David, Betty	David, Bruce
David, Craig	David, Terri	Davidse, Karen	Davidson, Ann	Davidson, Barbara	Davidson, Maggie
Davidson, Mrs. Pamela	Davidson, Nicholas	davidson, robert	Davidson, Steve	Davidson, Steve	Davie, Mr. Michael C
Davies Jr, Boyd A	Davies, A.l.	Davies, Charlene	Davies, Donna	Davies, Dorothy	Davies, Janet
Davies, Jill	Davies, John	Davies, Mr. Steven	Davies, Rachel	Davies, Sha	Davies, Valerie
Davies,, Jr. Dr. Thomas M.	Davila, Matthew	Davis, Angela	Davis, Brad	Davis, Carla H	Davis, Carol
Davis, Chris	Davis, Chrysantha	Davis, Dan	Davis, Dart	Davis, Deanna	Davis, Donna
Davis, Donna	Davis, Donna	Davis, Elaine	Davis, Felton	Davis, George	Davis, George
Davis, Ginger Alexakis	Davis, Heather	Davis, J	Davis, Jacob	Davis, Jean	Davis, Jim
Davis, John	Davis, Judith A	Davis, Karmin	Davis, Kat	Davis, Kyle	Davis, Liz
Davis, Michelle	Davis, Mr. Randall	Davis, Nina	davis, patricia	Davis, Rick	Davis, Ronald
Davis, Ryan	Davis, Sharon	Davis, Shellee	Davis, Sherry	Davis, Shonna	Davis, Tamekka
Davis, Timothy	Davis, Tod	Davison, William	Davison, Wilma	Dawley, Thomas	Dawson, Barbara
Dawson, James	Dawson, Julie	Dawson, Leilani	Dawson, Ms. Eileen	Day, David	Day, Edward
Day, Emi	Day, Emily	Dazzi, Andrea	De Angelis, Christine	de Arteaga, Jose	de Boer, Pernille
de Boer, Pernille	De Castro, German	De Cecco, Jorge	De Cecco, Jose	De Clark, Bonnie	De Glas, Frances
De Goff M.D., William and Family	De Goff, Robert and family	De Goff, Victoria and family	De Gregorio, Lino	de Groot, Jannemieke	de Groot, Jannemieke
De Jasu, Ms. Barry	De Jong, Joan	De Jong, Suzan	De Krem, Kristien	de la Cruz, Claudia	De La Cruz, Enrique
de la Cueva, Horacio	De la Garza, Laura	De La Rosa, Ken	de la Rosa, Marco	de Lange, Mike	De Mirjian, Carolyn
De Mirjian, Carolyn	De Mott, Jean	De Nicola, Franco	de Picciotto, Leonie	De Silva, Johnny	De Simone, Terry
De Vries, Duane	de Vries, John	de Waal, John	de Wit, monie	de Zúñiga, Gonzalo	Deacy, Bob
Deadman, Florence	Deagon, Ann	Deal, J.Dana	Deamer, John	Dean, D3lta	Dean, Linda
Dean, Nancy H.	Dean, Spencer	DeAngelis, Michael	DeAngelo, Vic	Dearborn, Carol	Deardorff, Alyssa
Deardorff, Duane	Deardorff, Glen	Dearing, Deb	Dearing, kristy	Dearmont, Marjorie	Dearnaley, Carol-Ann
Deason, Bartley	Debasitis, Brian	DeBeer, C	DeBoer, Elisa	DeBonis, JeriLynn	DeBreto, Gina
Debrunner, Peter	Debusschere, Sandra	Decargouet, Yves	DeCaria, Tina	Decater, Gloria	DeChiazza, Vicki
DeChiazza, Vicki	DeChiazza, Vicki	DeCiccio, Robyn	Deck, Mr. Robert T.	Decker, Dody	Deckert, Daniel
Deckert, Manfred	DeCroes, M	dedashti, sheedy	Deed, Kenneth	Deegan, Caroline	Deel, Ester
Deems, Robert Mercer	Deen, Daysha	Deen, Kara	Deep, James	Deer, Kathy	Deerhake, Patsy
Deering, Edward	Deering, Mr. Scott Dale	Deerlyjohnson, Suzanne	Deery, Theresa H	DeFino, Mary Lou	DeFoggi, Virginia
DeFreitas, Susan	deGero, Beverly	Degner, James	DeGooyer, Stacey	Degraw, Catherine	Degrigoli, Vito
DeGroot, Daniel	Dehmer, Pam	Dehmer, Shirley	Dehn, Dennis	DeJarlais, Nancy	DeJesus, Jeanette
DeJong, Sjoerd	Dekker, Friend	Del Prato, Pierre	Del Tufo, Catherine	Del Valle, Javier	Del vecchio, Nate
Delacruz, Patricia	DeLaForce, Kamaria	DeLaGarza, Blanca	DeLamater, Adair	Delaney, Janet	Delaney, Linda
Delaney, Mrs. Clairone C	Delaney, Richard	Delaney, Teresa	Delattre, Angelique	Delavan, Allison	Delgado, Barbara
Delgado, John	Delibos, John	deLima, Carol	Delker, Jennifer	Deller, Tim	Delmar, Roger

Delmestri, Barbara	Delprete, Joan	DelSavio, Gail	deltognoarmanasco, John	DeLuca, Patricia	Delvalle, Lance
DeMaddalena, Deborah	Demar, Rachael	DeMarco, Frankie	DeMarco, Jeni	DeMarco, Joseph	DeMars, Lee
DeMars, Lee	DeMasi, Greg	Dember, Ira	Demers, David	Demeter, Barbara	Demetreon, Alice
Demetriou, Tony	DeMeyer, Daniel	Demian, .	Dempsey, Sheila	DeNard, David	Dengis, Janice
Denham, Jessica	Denis, Laurie	DeNise, Max	Denneen, Bill	Denney, Joel	Dennis, MarianKitty
Dennison, Brett	Denniston, Ethan	Denny, Bruce	Densmore, Paul	Dente, Ann	Denton, Jeff
Denton, Michael	Denton, Walter	Dentz, Rebecca	DeNunzio, Bruce & Maureen	Deo, Mel	Deora, Karen
DePalma, Vera	Depaul, Monica	Depew, Robert	Depinto, Frank	deptula, john	DePue, David
Deputy, Glyn	der Mast, Lauren van	der Meer, Carla van	Derasary, Lara	Derks, Laura	Derks, Laura
Derleth, Penny	Deroche Jr., Russel	DeRooy, Constance	Derout, Stephan	d'Errico, Hannah	derson, Valda A
DeSanctis, Joseph	DeSantis, Amy	DeSantis, Richard	DeSarbe, Michael Lauren	DeSecki, Nancy	DeSerio, Michaelangelo
Deshotels, James	Desjarlais, Catherine	Desjarlais, Catherine	Desjarlais, Catherine	DesLauriers, Denise M	Desler, Elizabeth
Desmarais, Dennis	DesMarais, Michael	Desmond, Laird	DeSomber, Bev	DeSomber, Bev	Desonia, Warren
Dessoy, Francine	DeStefano, Paul	DeStefano, Robert	Detaranto, Joe	Detato, Susan	Detrick, Mrs. Mary
Deubel, Paula Marie	Deutsch, Steven	Devaney, Robin	Deveraux, Marc	Deveson, Frank	Devilliers, Maxime
Devine, Chris	Devine, Cindy	DeVine, Joanne	Devine, Neal	devinney, claudia	devinney, claudia
Devlin, Clotilda G.	Devlin, Clotilda G.	Devlin, Felicity	Devlin, Neil	Devlin, Summer	DeVoney, Bev
Devoss, Carol	deVROEDT, CARY	Dewald, Pacia	Dewar, Patricia	Dewberry, Anne	Dewhurst, Myra
DeWitt, Elizabeth	DeYoung, John	Deysher, Anne	Dezotelle, Linda	Di Cunto, Flora	Di Frega, Maria Pia Scotto
DiAgosta, Judy	Diamond, CarolFriend	Diamond, Meredith	Diamond, Michael	Diamond, Mitchell	Diana, Debra
Diaz, Herman	Diaz, J	Diaz, jose	Diaz, Julie	Diaz, Michael R.	Diaz, Mr. Jim
Diaz, Patience	Diaz, Tony	Dibelka, George	DiBenedetto, Richard	DiCarlo, Leigh Ann	Dicey, Kim
DiChiara, Dr. Tim	Dick, Marion	Dick, Nicole	Dickerson, Susan	Dickey, Helen	Dickey, Laura
Dickinson, Nancy	Dickinson, Norman	Dickinson, Robert	Dickinson, Robert	Dickinson, Vicki	Dickinson-Adams, Emily
Dickson, Dawn	Dickson, Kerry	Dickstein, Stephen	Dicoste, Patricia	DiCristina, Rafael	DiCristina, Rafael
DiCristina, Rafael	DiCristina, Rafael	DiCristina, Rafael	DiCristina, Rafael	Dicus, Laura	DiDonato, Toni
Diederichs, Barbara	Diedrich, Martin	Diehl, Daniel	Diehl, William	Diemand, Grace	Diener, B. Thomas Thomas
Diephouse, Roberta	Dierig, John	Dierks, Beth	Dierks, Dick	Dieter, Jean	Dieterich-Hughes, Sandra
Dietrich, Robert	Dietterich, Lee	Dietz, Kerry	DiFalco, Louis	DiGennaro, Jo-Tina	Diggs, Kevin
DiGiovanni Jr., Robert B.	Dikhanov, T	DiLabio, Gena	DiLeo, Carmine	Dillard, Gavin	Dillenburger, Werner
Dilley, Eric	Dilley, Mark	Dilley, Richard	Dillon, Sheila	Dilworth, Alexandra	DiMarco, Corrine
DiMaria, Mark	DiMartino, Penelope	DiMatteo, Mr. Richard	Dimech, Patty	Dimitriadis, Margaret	Dimitrov, Carol
Dimmitt, Rafe	Dimock, Donald E	Dindia, Karen	dingman, amy	Dingman, J.A.	Dinhofer, Jacalyn
Dinnen, Sherry	Dinoto, Cj	Dinucci, Pam	Dioletis, Cleo	Dion, Eve	Dionysus, Lucius
DiPaola, Marisa	DiPasquale, Peter	Dipboye, Carolyn	Dipinto, K	Director, Z.Vijay	Direnzo, Michele
DiSalvatore, Felicia	Disdier, Ricki	Dishman, Mr. Patricia	DiSimone, Christine	Distad, Leslie	DiStefano, Robert
DiTizio, Vincent	ditlow, f	Ditore, Steve	Ditterick, David & Leneda	Divens, Alicia	Divine, Christine
Divine, Patrick	Divoff, Suznane	Dixon, Angie	Dixon, Diane	Dixon, Jim	Dixon, Joanne
Dixon, Penny	Dixon-Harvey, Pamella	Dixon-Harvey, Pamella	Dixon-Harvey, Pamella	Dixson, Cynthia	Djakovic, Aleksandar
Dlugonski, Melba	Dlugopolsky, Pete	Do, Long	Do, Long	Do, Long	Doades, Kristy
Dobbs, Marion	Dobbs, Michael	Dobronyi, Kathy	Dobronyi, Kathy	Dobronyi, Roger	Dobryn, Ms. Renata
Dobski, Deborah	Doby, Albert	Dockendorff, Merle	Dockter, Richard	Dodd, Belinda	Dodge, Alex
Dodson, Carol	Dodson, David	Dodson, Linda	Dodson, Melissa	Doede, Robert	Doering, David

Doerr, Helena	Doherty, Anthony	Doherty, Lorraine	Doherty, Mike	Dolan, Lee	Dolivo, Anne
Doll, Steve	Dolloff, Michael	Dom, Ralph	Domb, Doreen	Dombrowski, Michael	Domenico, Jim
Domin, Ronald	Domingue, Christine	Dominguez, Cecilia	Dominguez, Laura	Dominguez, Rodrigo	domon, Jerry
Donabed, Sargon	Donahue, Kerry	Donahue, Sandra	Donais, Mike	Donald, John	Donaldson, Jamie K
Donaldson, Kathryn	Donas, Elena	Donath, Gail	Donch, Mary	Dondero, Marge	Doney, Sandra
Donez, Jayme	Donian, Mitchell	Donier, Jeremiah	Donley, Alison	Donnay, Marguerite	Donnell, Bruce
Donnelly, Debbie	Donnelly, Stephen	D'Onofrio, Sue	Donoso, Steve	Donovan, Deanna	Donovan, Diana
Donovan, Mr. Stephan	Donovan, Peg	Doolen, Tina	Dooley, Philip	Doorish, Dr. John F	Doran, Terry
Dorchin, Susan	Dorer, Jeff	Dorey, April	Dorfman, Mary Virginia	Dorman, Shelbe	Dörmann, Julian
Dornan, M C	Dornfeld, Robert	Dorr, Kelly	Dorrance, Sarah	Dorsett, Felicity	Dorsey, Thomas
Dortch, Alan	Dorwin, Sarah	Dosaj, Soraya	Dotson, Mike	Doty, Carol	Doty, David
Doty, Thea	Doucet, Barbara	Dougherty, Burnett	Dougherty, Janet	Douglas, Carolyn	Douglas, Dianne
Douglas, Jayne	Douglas, Tammy	Douglas, Virginia	Douglass, Andronetta	Doukas, Gayle	Doulatshahi, Paulette
Douse, Bob	Doussal, Elodie	Doverspike, Shana	Dow, Dylan	Dow, Jane	Dowden, Ralph
Dowdle, Daniel	Dowling, Christopher	Dowling, Gary	Dowling, Glenna	Dowling, Holly	Dowling, Jay
Downey, Janelle	Downie, Peter	Downing, David	Downs, Tanya	Downs, William	Dows, Wena
Dowson, Eleanor	Doyle, A E	Doyle, Patricia	Dozier, Jacqueline	Dragomir, Elena	Drahan, Casimir
Drahos, Ronald	Drake, barb	Drake, Carol	Drake, Darlene	Drake, Mercy	Drake, Priscilla
Drake, Tracy	Drakes, Sean	Draper, Janet	Draper, Marc	Draughon, Connie	Dravis, Mia
Draznin, Neal	Dreger, Fred	Dreier, Tamara	Drever, Kevin	Drew, Rameshwar	Drew, Tommy
Drey, Robert	Dreyer, Sharyn	Driessen, Lynn	Drinis, Sophia	Driscoll, Breana	Driscoll, Christie
Driskill, Anna	Dristiliaris, Arthur	Driver, Susan	Drobeck, Susan	Drop, Robert	Droppers, Joanne
Drought, Caroline	Druffel, Pauline	Druke, Carmen	Drula, Bogdan	Drumm, Philip	Drummond, Anna
Drumright, Chris	Druzianich, Dru	Drwinga, Helen L.	du Rivage, Robert	du Ross, Jean	Du Soleil, Isabelle
Du Toit, Denys	Duane, Mary	Dube, Alexandra	Dube, Gary	Dubé, Pascale	Dubetz, Ms. Paulette
Dubiel, Daniel	Dubois, Annette	DuBois, Courtney	DuBois, Jeannette	Dubord, Corinne	dubow, reed
Duc, Jeannette Le	DuCharme, Elena	Ducharme, Tim	Duchon, Laura	Duchyns, Tara	Duckworth, Nadine
Duckworth, Susie	Dudek, Maxwell	Dudkowski, Jan	Dudley, Roslyn	Dudley, Sam	Duellman, James
Duerr, J	Duerr, Sue	Dufau, Pat	Dufel, Laura	Duffield, Charlotte	Duffy, Connor
Duffy, Kara	Duffy, Richard	Dufour, Richard	Dugan, Jim	Dugan, Meg	Dugaw, Anne
Duggan, Betty_Ann	Duggan, Eric	Duggan, Sandra	Duke, Lynda	Dukes, Raymond	Dulas, Scott
Duleba, NatalieNatalie	Dumas, Marc	Dumke, Sandy	Dumsha, Jenna	Dunavan, Nancy	Dunbar, Andrew
Dunbar, Laura	Dunbar, Miriam	Duncan, Barbara	Duncan, Denise	Duncan, Diana	Duncan, Gregory
Duncan, Kasi Spyker	Duncan, Ms. Barbara	Duncan, Sylvia	Dunch, Victoria	Dunford, Heather	Dungan, Steven
Dunham, Jack	Dunham, Moneca	Dunham, Susan	Dunkak, Dave	Dunlap, Elizabeth	Dunlap, Louise
Dunleavy, Mary	Dunn, Ann Marie	Dunn, Brian	Dunn, Charles and June	Dunn, Cynthia	Dunn, David M.
Dunn, Diane	Dunn, John	Dunn, Linda	Dunn, Michelle	Dunn, Richard	Dunn, Stuart
Dunn, Susan	Dunn, Timothy	Dunn, Trisha	dunphy, lisa	Dunsmore, Stuart	Duong, Kevin
Duong, Nic	Dupont, Christine	Duppstadt, Eileen	Dupree, Sarah	Duran, Janet P	Durand, Hélène
Durando, Mary	Durbin, Matthew	Durbin, Steve	Durfee, Donna	Durham, D.	Durham, Margaret
Durkin, Samuel	Durrum, Kathy	Durst, Thomas	Durward, RoseMarie	Duster, George	Dutcher, Sandra
Dutot, Jackie	Dutra, Ron	Dutson, Doug	Duval, Damon	Duvall, Jade	Duvall, Miller
Dwelle, Lorraine	Dwillis, Alan	Dwinell, Danny	Dworaczyk, Brett	Dwyer, Ml	Dwyer, Virginia
Dyck, J.Isabelle	Dycus, Ruby	Dycus, Terry	Dye, Dean	Dye, Doug	Dye, Ed
Dyer, Bonney	Dyer, Jym	Dyer, Paul	Dyer, Sara	Dyke, Andree	Dykhuis, Roger
Dym, Harvey	Dymesich, John	Dysart, Tonya	Dyson-Cobb, Margaret	Dzubak, Cheryl	Dzubak, Cheryl
e, b	e, b	e, b	e, b	e, b	e, b
e, b	e, b	e, b	e, b	E, Elizabeth	E, Esteban
E, Kirsten	E, S	E, Sherry	e, t	E., Stephanie	Eads, Mike
Eagan, Ann	Eakin, Maureen	Earhart, Anne	Earhart, John	Earl, Dao	Earl, Margaret

Earl, Roxanne	Earley, Alexandria	Earley, Eleanor	Earnshaw, Shinann	Earp, Teresa	Easley, Judah Joy
East, Arlene	East, Kathy	East, Lawrence	Easter, Alison	Easterling, Anne	Easterling, Kermit
Eastwood, Helene	Eaton, Betsy	Eaton, James	Eaton, Kathleen	Eaton, Keith	Eaves, Kelly
Ebel, Walter	Eben, Taylor	Eber, Franziska	eberle, mel	Echegaray, Laura	Echelle, Sandi
Eckberg, Brenda	Eckert, Stephanie	Eckler, John	Eckler, John	Eckler, John	Eckles, Sabrina
Ecklund, John	Ecklund, Susan	Edchelmeyer, Frank	Eddy, John	Eddy, Roger	Edell, Elaine
Edelman, Eric	Edelson, Rachel	Eden, Jonathan R.	Edens, Teresa	Eder, Caolan	Edes, Joseph
Edgar, David	Edgerton, Leslie	Edgerton, Muriel	Eding, Megan	Edinger, Iris	Edmison, Sean
Edmonds, Matthew	Edmonds, Teresa	Edmondson, Anna	Edmondson, Nancy	Edmondson, Rick	Edmonston, Pandora
Edmunds, Sarah	Edson, Patricia	Edwards, Anne	Edwards, Aryia	Edwards, Daniel	Edwards, Elizabeth Carol
Edwards, Eric	Edwards, Harry	Edwards, Harry	Edwards, Jacqueline	Edwards, Jane	edwards, joe
Edwards, Julie	Edwards, Kathleen	Edwards, Lesley	Edwards, Mary	Edwards, Monique	Edwards, Peggy
Eells, Margaret	Efimova, Valeriya	Efraimson, Catherine	Efron, Deborah	Egerton, Beate	Egger, Wolfgang M.
eggers, k.	Eggerth, Rick	Eggleston, Chris	Eggleston, David	Ehmke, Darrell	Ehrhardt, Carole
Ehrhardt, Erin	Eibel, Samara	Eicher, Ms. Amber	Eichleay, Robin	Eide, Mary	Eiesland, Nora
Eigenbauer, Mr. Robert	Eiland, Fred	Eiland, Fred	Eisee, Noam	Eisen, Ph.D., Dr. Harvey	Eisenberg, Mr. Alan
Eisenberg, Mr. Paul	Eisenman, Jim	Eisman, Gregg	Eisner, Sara	Eitner, Alice	Ekin, Muammer
Eklund, Glenn	Eklund, Laura	Eklund, Steve	Elan, Gypsy	El-Bayoumi, Amr	Elder, Dave
Elder, Fonda	Elder, Robert	Eldon, Susan	Eldred, Stephen	Eldred, Stephen	Eldred, Stephen
Eldridge, Jax'n	Eldridge, Sara	Elewski, Chester	Elia, Rob	Elias, Gabriela	Elias, James
Elias, Lindsay	Eliason, Polly	Elijah, Janna	Elkin, Casey	Elkington, Harriet	Elkins, Elizabeth
Elkins, Michael	Ellenberger, Charles	Ellenberger, Mr. David	Elliott, Judith	Elliott, Judith	Elliott, Patti
Elliott, R Bruce	Elliott, Russell	Elliott, Shannon	Ellis, C.K.	Ellis, Catherine	Ellis, David
Ellis, J A	Ellis, Jack K.	Ellis, Joyce	Ellis, K	ellis, mary	Ellis, Meridith
Ellis, R.	Ellis, Sheila	Ellis, Sheridan	Ellis, Steven	Ellis, Susan	Ellis, Susan
Ellison, Mike	Ellmers, Christopher	Elmer, Judith	Elmore, Ronald	Elms, Elfie	Elosua, R
Elsenhans, Linda	Elston, Marsha	Ely, Jo Ann	Emberton, Hilary	Embrey, Glenn	Emerick, Craig
Emerick, Dennis	Emerick, Rgoer	Emerson, Anne	Emerson, C	Emerson, Jan	Emerson, Sylvia
Emery, Anita	Emery, Richard	Emery, Susan	Emmer, Matthew	Emmons, Brian	Emmons, Jamie
Emrys, Sarah	Encarnação, Lina	endicott, tina	Endres, Christina	Endrom, S	Eneman, anne
Eng, Ed	Engdahl, Anna	Engel, Carolyn	Engel, Linda	Engel, S	ENGELBRECHT, Barbara
Engelbrecht, Lindi	Engelhardt, Klaus	Engelking, Jim	Engelman, Beth	Engels, Angelika	England, Peggy
England, Roland	Engle, I.	Engle, Ian	Engler, Pam	Engler, Raya.	Englerth, Charlene
English, Ann	Englund, Rob	Enkiri, Nancy	Enlow, Cynthia	Enlow, Ivy	Ennis, Martha
Ennis, Suzanne	Enochs, Frankie	Enos, Robin A	Enright, Elizabeth	Ensign, Dianne	Enslow, Nicole
Ensor, Sandra	Epple, Melissa	Eppler, Ann	Epstein, Ellen	Epstein, Judith	Epstein, Kelly
Erceg, George	Erdeljac, Joseph	Erdmann, Donette	Erdreich, David	Erhard, Catherine	Erickson, Bob
Erickson, Carl	Erickson, Carol	Erickson, Leanne	Erickson, Patrick	Erickson, Victoria	Ericsson, Dorothea
Erikson, Anne	Erikson, George	Erkkila, Catherine Boland	Erlendsson, Lori	Erlich, Barbara	Ernst, Cathie
Ernster, Craig	Errea, Mack	eRSEK, Bryan	Erts, Nancy	Erwin, Christina	Erwin, Diane
Erwin, Jeffrey	Erwin, Mrs. Phyllis	Erwin, Tom	Escajeda, Dr. Mark	esch, dean	eschen, john
Esden-Tempski, Danika	Eskilsson, Eva	Espeland, Shirley	Esperas, Randall	Espersen, Brooke	Espino, Linda
Espinoza, Bernadette	espinoza, debra	Espinoza, Jalysa	Espinoza, Yaraly	Esposito, Steven	Esquivel, Cecil
Essenmacher, Barbara	Esslinger, Angela	Esslinger, Paul	Essmann, Jayne	Estacion, Carlene	Estel, Karen
Estrada, Suehan	Etchison, Craig	Etheridge, Donna	Ethridge, Diane	Etter, Eleanor	Etter, Valerie
Eubank, Angie	Eubank, Foster	Eudy, Elaine	Euler, Mark	Eunson, Jean	Eurich, Quinn
Eury, Laurel	Eusey, Paul	Euvremer, Teryl	Evand, H	Evand, H	Evans, Bronwen

Evans, Bronwen	Evans, Bronwen	Evans, Chad	Evans, Chris	Evans, Dawn	Evans, Ellen
Evans, Evelyn	Evans, Helen	Evans, Jeffrey and Susan	Evans, Karen	Evans, Lee	Evans, Marie
Evans, Ms Keisha	Evans, Noah	Evans, Susan	evans, susan	Eve, Guy	Eve, Guy
Evelyn, Elizabeth	Evens, Jean I	Evenson, Marilyn	Eventoff, Franklin	Everett, Greg	Everett, John
Everett, Karla	Everett, Todd	Everette, Walker	Everling, Nicole	Everly, Patricia	Eversoll, Anne
Everton, Keith	Evett, Elisa	Evinger, Linda	Evison, Helen	Evon, Debra	Evon, Lani
Ewald, Susan	Ewer, Judith	Ewert, Kai	Ewing, Ann	Ewing, Jana	Ewing, Renee
Ewing, Suzanne	Eyer, Cecilia	Eyler, Kristy	Ezerman, Elizabeth	f, kellie	f, p
F., Amy	f., andrea	F., J.	F., T.	F., T.	Faberová, Tamara
Fabian, Dan	Fackler, Bradley	Factor, Greta	Fahlstrom, Jeanne	Fahmy, Natalie	Faiella, Nicholas
Fain, Glenn	Fair, Jeanine	Fair, Linda	Fair, Mila	Fair, Patricia	Fairbanks, Jeff
Fairbrother, Patricia	Fairless, Caroline	Fairless, Judy	Fairley, Peter	Fairweather, Mr. Douglas	Fairweather, Mr. Douglas
Fait, Martha	Faith-Smith, Rev. Bonnie J.	Falabella, Lauri	Falcon, Ruth Neuwald	Falcone, Janet	Falkenstein, Joan
Fallaw, Jenna	Fallender, Desborah	Fallon, Jean	Fallon, Patricia	Falsetta, Jennifer	Falsetta, Jennifer
Falter, Ben	Falvey, Tom	Falzone, Dominick	Family, Richard Sherman and	family, The U.	family, The U.
family, The U.	Fannin, Jo Anne	Fante, Linda	Farabaugh, Clare	Farago, Katherine	Faraldo, Adriana
Farenkopf, Nathan	Farha, John	Farha, Nancy	Farhoud, Aisha	Faria, Dorothy	Faria, Matilda
Farina, Mrs. carol	Farina, Robert	Farkas, Sandra	Farkash, Ms. Stephanie	Farley, Arnold	Farley, Chanda
Farlow, Ms. J.i.	Farmer, Mr. Stephen	Farneth, Sara	Farrahi, Shireen	Farrar, Susan	Farrell, Adam
Farrell, Bob	Farrell, Francis	Farrell, Jim	Farrell, Wendy	Farren, Donald	Farreny, Ashley
Farringer, Cynthia	Farris, Jean	Farro, Susan	Farver, Mike	Farwell, Geralyn	Fary, Jim
Fasano, Jeff	Fascina, Nicola	Fass, Arline	Fast, Phyllis	Fast, Wendy	Fast, William
Fast, William	Fastuca, Meagan	Faucher, Dan	Fauconnier, Jean-François	Faulkner, Stewart	Faust, Jeanne
Fawley, Alan	Fay, Paulette	Faye, Jenica	Fea, Viochita	Fea, Viochita	Fea, Viochita
Fedele, Douglas	Federman, Steven	Fedor, Colleen	Fedorow, Steve	Fee, Dennis	Fee, Jack
Fehr, Richard	Feild, Ryan	Feimster, Gary	Feingold, Alan	Feirtag, Donna	Feissel, Sharon
Felber, Laurel	Felber, Michael	Felber, Steven	Feldman, Jeremy	Feldman, Joanne	Feldman, Mr. Mark
Feldman, Tracy	Feldmann, Heike	Feldman-Saylor, Nancy	Feletar, Linda	Feletar, Linda	Fellenz, Jan
Fellows, Hope	Felmet, Michael	Felske, Linda	Feltham, Bette	Felver, Ms. Rachel	Fendall, Ramsey
Fender, Flo	Fenenbock, Lauren	Fenick, Amanda	Fenster, Laura	Fenster, Steven	Feokhari, Anton
Feokhari, Anton	Feran, Michael	ferber, vann	Ferdowsian, Fred	Ferger, David	Fergeson, Cheryl
Fergot, Michael J	Ferguson, Alan	Ferguson, Brian	Ferguson, Charlene	Ferguson, David	ferguson, gary
Ferguson, J	Ferguson, Janice	Ferguson, Meghan	Ferguson, Mike	Ferguson, Raymond	Ferguson, Seth
Ferguson, Voncile	Ferguson, Yolanda	Ferland, Linda	Ferman, Pam	Fernald, Kirk	Fernald, M
Fernandes, Lucy	Fernandes, Perolina	Fernandez, Carol	Fernandez, Mary	Fernandez, Mary Jo	Fernandez, Sabrina
Fernandez, Valeria	Ferrabee, Brian	Ferrandino, Linda	Ferrans, Jonathan	Ferranti, Alexia	Ferraro, Michael
Ferraro, Ms. Mary	Ferre, Sylvia RodrÃ•guez	Ferreira, Liliana	Ferrell, William	Ferrigno, Mary	Ferrito, Thomas
Ferro, Federico	Fertig, Asano	Fertig, Carol	Fesler, Andy	Fetters, John	Fetzek, Eve
Feuille, Leslie	Feuling, Mary	Feurring, Joyce	Fexis, Deborah	Feyk, Craig	Fiaschi, Michelle
Fichter, Jim	Fichter, Sarah	Fichter, Thomas M	Fichter, Thomas M	Fiecke, Tyler	Fiedler, David
Fiedler, Ed	Fiedor, Jillian	Fiegel, Deborah	Field, Brian	Field, David	Field, Liz
Field, Tanya	Fielden, Dr. Jessica	Fielder, Aixa	Fielder, Linda	Fields, Barbara	Fierle, Mimi
Fife, Liz	Figueroa, Daphne	Figueroa, Maria	Filatov, Sergey	Filauri, Joyce	Filho, Ismar Pereira
Filip, Thomas	Filip, Thomas	Fillmore, Jamie	Fillmore, Nancy	Finch, Glenn	Finch, Taylor
Fine, Cindy	Finger, Mary Ann	Fingerhut, B.	Fink, James	Fink, Mr. Brian	Finkel, Allyson
Finley, Aliza S	Finley, Andrea	Finley, Jeanne	Finley, Joel	Finman, Sigmund	Finnie, Chris

Finocchiaro, John	Fiorillo, Rosemarie	Fiorini, Dianna	Fiorino, Robert	Firebaugh, Bunny	Firely, Monica
Firestone, Douglas	Firman, Douglas	Fischer, Cheryl	Fischer, Gloria	Fischer, Louis	Fischer, Michael
Fischer, Ms. Elaine	Fischer, Rosanne	Fischlowitz, Sue	Fischoff, Robert	Fiscus, Ann	Fish, Charles
Fishbein, Alice	Fishburn, Charles	Fisher, Amanda	Fisher, Andrew	Fisher, David	Fisher, Don
Fisher, Elizabeth	Fisher, Geoffrey	Fisher, Helen M.	Fisher, Jack	Fisher, John	Fisher, Kim
Fisher, Laughton	Fisher, Laughton	Fisher, Mr. Gerald	Fisher, Myrna	Fisher, Nathan	Fisher, Penelope
Fisher, Sandi	Fisher, Susan	Fishgold, James	Fishman, Ted	Fishman, Ted	Fishman, Ted
Fishman, Temma	Fisk, Todd	Fisk, William	Fissinger, Ms. Kaye	Fister, Lee	Fitch, Kaitlin
Fite, Austin	Fite, Gregory	fithian, joel	Fitting, Elizabeth	Fittipaldi, Silvio	Fitzgerald, Barb
Fitzgerald, Elizabeth	Fitzgerald, Kathleen	Fitzgerald, Kathleen	Fitzgerald, MD, Shari	Fitzgerald, Michelle	Fitzgerald, Mr. Stan
FitzGerald, Rita-Ann	FitzGerald, Rita-Ann	Fitzpatrick, Louis And Patricia	Fitzsimmons, Jane	Fjälltoft, Michelle	Flachier, Roberto
Fladager, Susan	Fladger, Robert	Flaherty, Judith	Flaherty, Kathy	Flanagan, Lynn	Flanagan, Marianne
Flanagan, Tamara	Flanagan-Allein, Richard-Susan	Flanders, Lenore	Flann, Sj	Flanz, Anne	Flashman, Irwin
Flater, John	Fleetwood, Patricia	Fleischer, Timothy	Fleming, Jim	Fleming, John AND Jean	Fleming, Laura
Fleming, Laurie	Fleming, Melissa	Fleming, Tami	Fleming, William	Flennery, Katherine	Fletcher, Barbara
Fletcher, Karen	Fletcher, Pam	Fletcher, Russell	Fletter, Stephanie	Fleury, Anthony	Flick, Betsy
Flieder, Dee	Floersch, Pat	Flora, David	florack, john	Florenzen, Cynthia	Flores, amy
Flores, Amy	Flores, Jessica	Flores, Regina	Flores, Regina	Florin, Krista	Florken, Georger
Flowers, Michelle	Floyd, Linda	Floyd, Teresa	Fluck, Mike	Flum, sarah	Flury, Lois
Flynn, Kimberly	Flynn, Patrick	flynt, robert	Fobes, Deborah	Fodge, Kathy	Foerster, Sigrid
Fogarty, Emily	Fogel, Ms. Mindy	fokstuen, terje	Folden, Marilyn	Foldoe, Marnee	Foldvik, Dianne
Foley, Mary	Foley, Steve	foley, susan	Folk, Bethany	Folkertsma, Casey	Follett, Rob
Follingstad, Marianne	Fong, Mrs. Susan	Fonk, Daniel	Fonken, Miryam	Fontaine, Anna Louise	Fontenot, Daniel
Fontenot, MaryJo	Fontes, Carolyn	Foote, Judith	Foran, Jane	Forbes, J. Dana	Forbes, Jayne
Forbes, John	Forbes, Laurie	Forbes, Wiilliam	forcade, michael	Forcellini, Paola	Ford, Amber
Ford, Austin	Ford, L	Ford, Lauren	Ford, Leeann	Ford, Mark	Ford, Matthew
Ford, Matthew	Ford, Michelle	Ford, Sarah Valerio	Ford, Steve	Ford, Susan	Ford, Tiffany
Fore, Judy	Foreman, Mike	Foreman, Richard	Foreman, Scott	Forest, Agatha	Forester, Teri
Forin, Alexandra	Forman, Cathie	Forman, Deborah	forman, fay	forman, janet	Forman, Marian
Fornara, Pietro	Fornari, Arthur	Fornataro, Maria	Forney, Kathy	Forrest, Gail	Forrest, Kim
Forrest, Larry	Forrest, Mariah	Forrester, Lesley	Forschler, Frederick H.	Forster, Denise	Forster, Jess
Forsythe, Alexander	Forsythe, Linda	Forte, Sylvia	Fortier, Craig	Forwand, Arlene	Foschi, Patricia
Foskett, Mrs. MaryAnna	Foss, George	Foss, Jessine	Foster, Alan	Foster, Arthur	Foster, Beverly
Foster, Dawn	foster, jason	foster, ken	Foster, Lucinda	Foster, Lucinda	Foster, Mark
Foster, Merle	foster, Ms. lorraine	Foster, Pat	Foster, Rick	Foster, Sarah	Foti, Bernadette
Fougere, Paula	Fountain, Lupe	Fountain, Nicole	Fournier, Eric	Fournier, Jordan	Fouts, Shannon
Fowler, Barbara	Fowler, John	Fowler, Kerry	Fowler, Liz	Fowler, Londa	Fowler, Luci
Fowler, Mary	Fowler, Nika	Fox, Andrew	Fox, Bayard	Fox, Carol	Fox, Cinnamon
Fox, Ellen	Fox, Lynda	Fox, Martin	Fox, Norma	Fox, Raymond	Fox, Stephanie C.
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Fragulia, Jason	Frahm, Janene	Fraidstern, Janet	Fraker, Laurie	Fraley, Sarah	Franca, Kaylan
France, Tom	Francis, Tony	Franck, Matthew	Franco, Diana	Francois, Marilyn	Frandson, Karla
Frank, Billie	Frank, Margo	Frank, Mateja	Frank, Robert	Frank, Sally	Frank, Sharon
Frank, Tena	Frank, Tom	Franke, Autumn	Frankel, JJ	Frankel, Leroy	Franken, Richard
Franklin, Courtney	Franklin, S.P.	Franklin, Selena	Franks, Larry	Frantz, Claudia	Frantz, Glenn
Frantzen, Jens	Franz, Mary	Franz, Sandra	Franz, Sonja	Franzen, John	Franzese, Jill
Fraser, Mark	Fraser, Suzy	Fravel, Mary	Fraytet, Jules	Frazee, Carolyn	Frazee, Marcia

Frazer, James R.	Frazier, Michael	Frazier, Ms. Shelley	Frazin, Richard	Frechette, Allen	Freda, Gretchen
Frederick, Mrs. Patricia	Frederiksen, Chris	Fredricks, Lance	Fredrickson, Howard	Freedman, Matt	Freeland, Dr. Russell
Freels, Jeff	Freeman, Anna	Freeman, Clare S	Freeman, Cosette	Freeman, Cosette	Freeman, Cynthia
Freeman, Dan	Freeman, Doug	Freeman, Dr Rebekka	Freeman, Edward	Freeman, Forster W.	Freeman, Glenn
Freeman, J	Freeman, Joseph	Freeman, Kyri	Freeman, Mr. Gregory	Freeman, Richard	Freeman, Toni
Freer-Parsons, Christiane	Freese, Judith	Freewoman, Faith	Freeze, John	Frega, Doreen	Freid, David
Freiday, Tim	Freiermuth, v	Freiheit, Debbie	Freiman, Steven	Freitag, L.	French, Larry
French, Lisa	French, Nathanial	Frenzel, Reinhard	Freson, Mr. Neil F	Freud, Olive	Freund, Monica
Frey, Andrew	Frey, Brenda	Frey, Delphinia	Frey, Joan	Frey, John	Frey, Kathy
Frey, Kimberly	Frey, Nate	Frey, Patricia	Frey, Sarah	Frias, Nanette	Frick, Aaron
Frick, Dean	Fricker, Donald	FRIDAY, JEAN	Fridey, William	Fried, Joy	Friedman, Carolyn
Friedman, Leonard	Friedman, Linda	Friedman, Shani	Friedman, Sheila	Friedman, Terry	Friedman, Vakila T.
Friedrich, Christian	Friedrich, Lawrence	Friehauf, Mike	Frieman, David	Friend, David	Friend, Deborah
Friend, Judith	Friend, Peter	fries, jeb	Friesenhengst, Richard	Friestad, John	Frighetti, Paula
Frigo, Rick	Friis, Rolf	Friske, Miranda	Fritsch, Christina	Fritsch, Robert	Fritz, John
FRITZ, RON	Fritzler, Jake	Fritz-Smead, Kent	Fritz-Smead, Kent	Frixione, Holly	Frock, Timothy
Froehlich, Angie	Froehlich, Nicolette	Froehlich, Noelle	Froehlich, Noelle	Froemsdorf, Leah	Fromer, Arlene
Fromm, Lenny	Fronske, Dave	Frost, Dr. Thomas	Frost, Jaimie	Frost, Jenifer	Frost, Jenifer
Frost, Mary	Frost, Michael	Frugé, Doug	Fruth, Susan	Fry, Barbara	Fry, David
Fry, Edward	Fry, Eric	Frye, Bobbi	Frye, Donna	Frye, Douglas	Frye, Jay
Frye, Jayne	Fuchs, Lenny	fuchs, ronald	Fuchs, Ryan	Fuentes, Carmencita	Fuentes, Ivan
Fuentes, Ruver	Fuentes, Stephenie	Fuessel, Chere	Fugate, Mrs. Peggy	Fugina, Vincent	Fuglsang, Oscar
Fugman, Jr., Elmer A.	Fuher, Suzanne	Fuica, Isabel M.	Fujii, Grant	Fujinami, Masako	Fujioka, Julia
Fujita, Sandra	Fukuda-Schmid, Kristina	Fuller, Aaron	Fuller, Deborah	Fuller, Julia	Fuller, Mark
Fuller, Marsha	Fuller, Matt	Fuller, Michael	Fuller, Tony	Fullman, Ed	Fulton, Russ
Funes, Gabriel	Fung, Alyse	Fuqua, Kate	Fuqua, William Dubby	Furgerson, Dana	Furlan, Sophia
Furman, Casey	Furness, Kathleen	Furnish, Shearle	Furno, Sarah	Fursich, Rob	Furutate, Midori
Futrell, Ms. Sherrill	Fysz, Joseph	G, Anne	G, Anne	G, Cris	G, F
g, g	G, G	G, Joe	G, Kelly	G, Mr. David	G, Teresa
G, Tim	G., J.	G., Lorraine	G., Suzy	G., Thom	Gaarlandt, Jonathan
Gabriel, Candace	Gabriel, Carolyn	Gabriel, Misty	Gabrielle, Maria	Gacs, Tibor	Gad, Toby
Gaddy, Cameron	Gaddy, Cameron	Gadouas, T.	gaebe, gail	Gaetano, Nick	Gaetano, Tegan
Gaff, Mal	Gaffney, Robin	Gage, Kyle	Gage, Susan	Gagnon, Brian	Gagnon, Connie
Gagnon, Kathleen	Gagnon, Nicholas	Gagomiros, Mr. Keith	Gahan, Mr. Jerry	Gaignard, Jean	Gaissert, Steve
Gaither, Tanzella	Gajewski, Mary	Galasso, Joanne	Galbreath, Philip	Galdeano, Lorena	Galdo, Querido
Gale, Joan	Gale, Ms. Cheryl	Galitsis, John	Gallagher, Jim	Gallagher, Mike	Gallagher, Norm
Gallagher, Norm	Gallagher, Tom	Gallanosa, Kristin	Gallardo, Terraesa	Gallart, Francine	Gallatin, Andrew
Gallaway, Ann	Gallegos, Mark	galles, c	Gallo, Mrs. Patricia	Galloway, Christopher	Galpert, Larry
Galst, Ms. Liz	Galterio, Judith	Galushko, Sergey	Galvin, Michael	Galvin, Thesesa	Gamache, Robert
Gamber, Karen	Gambino, Thomas	Gamble, Albert	Gamble, Albert	gamble, fairlee	Gamblin, Steve
Gamer, Gerald	Gammon, Robert	Gamsby, Laura	Ganassi, Jill	Gandolfo, Deborah	Gandulla, Julie
Gang, Glenn	Gangasarran, Asha	ganMoryn, Croitiene	Gann, Valeska	Gannaway, Gloria	Gansel, Mariah
GANTNER, PAUL	Gantos, Angela	Gantt, Larry	Garber, Carol	Garbrick, Kathe	Garbutt, Toby
Garcia, Anthony	Garcia, Armando A.	Garcia, Craig	Garcia, Daniel	Garcia, Evette	Garcia, Joanna
Garcia, Jorge	Garcia, Jose	Garcia, Josh	garcia, manny	Garcia, Mr. Jeffery	Garcia, Oscar Grande
Garcia, Ph.D.-ABD, Ben F.	Garcia, Rosa	Garcia, Rosa	Garcia, Sandra	Garcia, Susan	Garcia, Susan

Garcia, Theckla	Garcia, Trey	Garcia-Romeu, Albert	Gardener, Sarah	Gardner, Adriane	Gardner, Annah
gardner, elizabeth	Gardner, Howard	Gardner, Kirk	Gardner, Ms. A.	Gardner, Sandy	Gardner, Sheryl
Gardner, Tina	Garenne, Jf	Garescher, Marie	Garfield, Dave	Garfield, Linda	Garfield, Sally
Garfield, Sally	Garibaldi, Elizabeth	Garin, Yves	Garitty, Michael	Garland, Gil	Garlit, Mr. Donald
Garman, Ian	Garnant, Mr. Gregory	Garner, Mr. & Mrs. John	Garner, Peter	Garnish, Frank	Garofalo, Gabriella
Garofalo, Stephanie	Garoutte, Debra	Garr, Phyllis	Garr, Phyllis	Garratt, Liz	Garrett, Randy
Garrett, Sarah	Garrett, Steve	Garrison, Alisa	Garrison, Angelia	Garrison, Claire Ryle	Garrison, Jacob
Garrison, Michael	Garrison, Ron	Garrity, Coleen	Garron, Steven	Garron, Steven	Garrratt, Zaneta
Garside, James	Gartin, Mrs. Courtney	gartner, david	Garvey, Lydia	Garvey, M.	Garvey, M.
Garza, Linda	Garza, Patrick	Garzon, Debbbe	gaskell, rosemary	Gaskins, Melissa	Gasner, Helene
Gasperoni, John	Gass, Kat	Gatenby, Anthony	Gates, Christopher	Gates, Connie	Gates, John
Gates, Robert	Gatfield, Cliffy	Gatlin, Gerri	Gattis, Judy	Gaudenti, Nicole	Gaudette, Lynn
Gaudette, Lynn	Gaudin, Gerard F.	Gaudio, Valerie	Gauntt, Tom	Gavin, C	Gavrin, Ginnie
Gawronski, Don	Gawryszewski, Nancy	Gawthrop, Janet	Gay, Ms. Carol	Gaya, Alexander	Gayken, Aaron
Gayler, Anne	gaylo, tom	Geary, Kate	Gebauer, David	Gebczyk, Diana	Gebhart, Tom
Gedlinske, Lauren	Gee, Lisa	Geear, Jim and Susan	Gegauff, Anthony	Gegg, Leslie	gehlert, edgar
Gehm, Priya	Gehres, Jr., Edward	Gehrs, Mindy	Geiger, Fred	Geiger, Marcia	Geiger, Melinda
Geiger, Richard	Geiser, Becky	Geisert, Diane	Gekas, Lee Ann	Gekko, Sharon	Gelber, Marjorie
Gelder, Donna	Gelfand, Carol	Gellar, Michael	Geller, Peter	Gellert, Sally J.	Gellert, Susan
Gellman, Erin	Gelman, Barb	Gelsman, Caroline	Gem, Alice	Gem, Martin	Genaze, Matthew
Gencz, Fely	Gendron, Bob	Gendvil, Derek	Genevich, Genny	Genevy, Julia	Gengo, Lisa
Genin, Merideth	Genn, Oliver	Genn, Oliver	Genoa, Brian	gensley, robert	Gentes, Amy
Gentes, Mija	Gentile, Andrew	Gentile, Roberta	Gentry, H Clarke	Gentry, Mark	George, Coleen
George, Kelly	George, Laurence	George, Linette	George, Mariada	George, Mark	George, Misha
George, Mr. Clyde	Gerain, Doni	Gerard, Bryan	Gerbitz, Mr. Gordon	Gerbolini, Alfonso	Gerdeman, Diane
Gerdes-McClain, William	Gergat, Jim	Gerhard, Dan	Gerhart, Geoff	Gerhart, Sandra	German, Bonnie
German, Dianne	Germanotta, Betsy	Germer, Libby	Gerndt, Robert	Gerosa, Robert	Gerrard, Ron
Gerry, Randi	Gerstmeyer, Virginia	Gerton, Shannon	Gertz, Michael	Gervais-Lynch, Meghann	Gervase, Lucille
Gessert, Ms. Kate	Geta, James	Gettig, Dawn	Gettins, Raymond	Geyer, Lisa	Gezelman, Barbara
Ghenoiu, Paul	Ghougasian, Susan	Giaccardo, Gina	Giamanco, Janet	Giampaoli, Janice	Gianantoni, Maryann
Giannelli, Michael	Giannuzzi, Michael	Gibb, Ken	Gibb, Robert	Gibbons, Jenn	Gibbons, Lourdes
Gibbs, Jeanne	Gibbs, John	Gibson, Cheryl	Gibson, Dr. James William	Gibson, Jeanne	Gibson, John
Gibson, Margaret	Gibson, Mary	Gibson, Miles	Gibson, Mrs. Jody	Gibson, Nathan	Gibson, Raymond
Gibson, Sara	Gibson, Susan	Gibson, Susan	Giddens, Teresa	Gieber, Donna Mulvey	Gielas, Frank
Giere, Linda	Gierlachowski, Alexandra	giese, john	Giesen, Gregory	Giese-Zimmer, Astrid	Giesy, Daniel
Giesy, Theo	Giffen, Phoenix	Giffin, Peter	Gifford, Robert	Gifford, Teresa	Gil, Savannah
Gilarowski, Elizabeth	Gilbert, Bill	Gilbert, Camille	GILBERT, JANE	Gilbert, Kamilah	Gilbert, Stephen
gilbert, valerie	Gilchrist, Amber	Gilchrist, Antoinette	Gilchrist, Tiamoyo	Gildehaus, Marie	Giles, James
Giles, Karen	Gilges, Robert D.	Gilgun, Mr. Michael	Giliberti, Frank	Gilkyson, Tony	Gill, Engraciagill
Gill, LFJ	Gill, Meagan E	Gill, Sharon	Gillam, Todd	Gilleland, Rachel	Gillespie, Rhiannon
gillette, kenneth	Gilley, Jane	Gilligan, Ainslie	Gilligan, Ainslie	Gillilan, Jennifer	Gilliland, Ron
Gilling, Lisa	Gillis, Greg	Gilmore, David	Gilmore, Mike	Gilmore, Sally	Gilmore, Susanna
Gilpatrick, David	Gilsing, Jean	Gimenez, Lance	Gimenez, Miguel	Gimmy, Marg	Gindt, Jennifer
Gingras, Brian	Gingras, Teresa	Ginn, Deb	Ginsberg, Gordon	Gintzler, Janice	Gioia, Linda
Gioielli, Lawrence	Gipson, Janice	Girard, Stephen	Girodes, Elizabeth	Girou, James	Girshick, Lori
Gisi, Mikel	Gissing, Margaret	Gitschier, Jennifer	gittlen, william	Giugni, Christine	Giustino, Margarita

Givens, Roger	Giwaydin, Jloura	Giza, Don	Gize, John	Gize, John	Glackin, Joseph
Gladish, Christine	Gladstone, Dave	Gladstone, David	Glaeske, Lynne	Glanz, Zach	Glarborg, Estelle
Glass, Deanna	Glass, Deanna	Glass, Don	GLATSTEIN, ELI	Glatz, Rick	Glau, Carol
Glazar, MaryAnne	Gleason, Debra	Gleaves, Donna	Gleeson, Roberta	Glenn, Cinda	Glenn, Martha
Glesne, Lynn	GLick, E	Glick, Rachel	Glidden, Hal	Glidden, Helen	Glidden, Janet
Gliem, Deke	Glier, Ingeborg	Glisson, Candie	Gliva, Mr. Stephen	Glod, Vicky	Gloor, Dr. Prisca
Glover, Janet	Glover, Kathleen	Glover, Kristina	Glover, Laura	Gluckman, Geoff	Glyde, Jacqui
Gobel, Stephen	Gobely, Michelle	Gocinski, Michael	Gockel, E.	Godard, Justin	Godek, Esther
Godfrey, Ayesha	Godin, Arthur	Godinez, Richard	Godoy, Susan	Godwin, Debra	Goeken, Murlin
Goerss, Regina	Goetinck, Jean	Goetschius, Lascinda	Goetz, Kate	Goetz, Paulette	Goff, Frances
Goff, Karyn	Goff, Sheldon	Goff, Thomas	Goff, Thomas	Goga, Alan	Gogel, Germaine
Gohata, Yas	Golata, Grace	Gold, Bary	Gold, Carol	Gold, Jeff	Gold, Leslie
Gold, Michael	Gold, Michael	Gold, Richard	Goldberg, Laura	Goldberg, Marian	Goldberg, Rich
Golden, Gene	Golden, Tanner	Goldflies, Barrett	Goldin, Jesse	Goldin, Martha	Goldman, Alvin
Goldman, Andrew	Goldman, Dr. Ron	Goldman, Linda	Goldman, Lisa	Goldman, Melanie B	Goldman, Paula
Goldman, Sam	Goldman, William	Goldman-Macdonald, Jane/Rob	Goldsmith, Phil	Goldsmith, Robinn	Goldstein, David
Goldstein, Susan	Golembeski, Edmund	Golembiewski, Mark	golio, gary	Goll, David	Golonka, HM, Maryann
Golub, Anne	Golub, Shirley	Gomes, Del	Gomes, Gabriel	Gomes, Gustavo	Gomes, Jeffrey
Gomes, Joseph	Gomes, K	Gomes, Lowell	Gomes, Stephen	Gomez, Evelyn	Gomez, Evelyn
Gomez, Jorge I.	Gondell, Ms. Robert	Gonta, Marianne	Gonyea, Gerald	Gonzales, Alfonso	Gonzales, April
Gonzales, Daniel	GONZALES, GAETANE	Gonzalez, Arlene	Gonzalez, Dan	Gonzalez, Gus	gonzalez, KRISTIN
Gonzalez, Maria	Gonzalez, Michael	Gonzalez, Patricia	Gonzalez, Patricia	Gonzalez, Victor M	Gonzalez, Violet
Gonzalez-Green, Vanessa	Good, Carolyn	Good, Patrick	Good, Ronda	Goodare, Malcolm	Goode, Imogen
Goode, Joanne	Goode, Sharon	Goode, Veronica	Goodell, Dwane	Gooden, Derry	Goodhart, James
Goodin, Dale	Gooding, Luna	Goodlander, LIsa Hanes	Goodman, Ann	Goodman, Arifa	Goodman, Jackie
Goodman, Janice	Goodman, Richard	Goodman, Samantha	Goodman, Timothy	Goodnight, Donna	Goodrich, Cathy
Goodrich, Cathy	Goodrich, D'Arcy	Goodrich, Debra	goodspeed, helen	Goodstone, Sandra	goodwin, gary
Goodwin, James	Goodwin, Michael	Goodwin, Nancy	Goodwin, Nancy	Goodwyn, Kahlil	goossens, clara
Gopinathan, Narayan	Goppert, Donald	Gorbaty, Susan	gordon, a	Gordon, Amanda	Gordon, David
Gordon, Delia	Gordon, Dianne	Gordon, Jacqueline	Gordon, Lauretta	Gordon, Leigh	Gordon, Marcia
Gordon, Morgan	Gordon, Ms. Alexandra	Gordon, Ms. Elissa	Gordon, Rick	Gordon, Rick	Gordon, Suzanne
Gorecki, Carol	Gorina, Maya	Gorn, Scott	Gorr, Michael	Gorrez, Theresa	Gorris, Maiara Carolina Telles
Gort, Susan	Gosine, Sandeep	Gossett, Claudine	Gosztonyi, Kevin J.	Gotfrid, Robin	Gotkowska, Ela
Gottfried, Susan	Gottschalk, Eileen	Gough, Jyrica	Gould, Catherine	Gould, Ed	Gould, Jacqueline
Gould, Ken	Gould, Kim	Gould, Raleigh	Gould, Stefanie	Gould, Steve	Gourville, Tracy
Gove, Dianne	Govreau, Kathy	Gower, Nicholas	Gowern, William	Goyette, Roland	Graas, Alex
Grabenhofer, Mrs. Frances	Grabowski, Kathy	Grabowski, Patti	Grabowski, Sister Rose	Grace, Bill	Grace, Donna
Graff, Stephen	Graff, Wanda	Graffagnino, Mary Ann and Frank	Grage, James	Graham, Amanda	Graham, Connie
Graham, Elizabeth	Graham, John	Graham, Karyn	Graham, Kathleen	Graham, Russell	Graham, Scott
Grainger, Elizabeth	Graminski, DM	Grammatico, Angela	Granat, Gary	Granberg, Ronald	Grandstaff, Lisa
Granger, Carrie	Granlund, Scott	Grant, Aileen	Grant, Alexander	Grant, Carol	Grant, David
Grant, Kathy	Grant, Lynn	Grant, Ms. Susan	Grant, Nancy	Grant, Rebecca	Grant, Virginia
Grassman, Mark	Grasso, Anthony	Grattan, Angela	Graubner, Gabriel	Graul, Kara	Gravance, Rochelle
Graveline, Linda	Graver, Chuck	Graves, Denis	Graves, Kathryn	Gravina, Erin	Gray, Audra
Gray, Charles	Gray, Clifton	Gray, Connie	Gray, Dianne	Gray, Elisabeth	Gray, Gail
Gray, Lewis	Gray, Matthew	Gray, Ms. Debra	Gray, Thomas	Graziano, Alexandra	Greavu, Moise

Grecco, Eowyn	Grecco, Eowyn	Grech, Miss Rhyan	Greco, Rose	Green, Arden	Green, Dorie
Green, Douglas	Green, Ed	Green, Ellie	Green, James	Green, Jamie	Green, Jeane
Green, Jesse	Green, Jim	Green, Joan	Green, Joyce	Green, Kristin	Green, L.
Green, Louella	Green, Mary	Green, Maynard	Green, Ms. Alice	Green, Pamela	Green, Patty
Green, Rax	Green, Rhonda	Green, Robin	Green, Virginia	Greenberg, Carol	Greenberg, Jean
Greenberg, Leonard	Greenberg, Mr. Stephen	Greenberg, Paul	Greenblatt, Harmon	Greenblatt, Rebecca	greenburg, stuart
Greene, Evan	Greene, Kathleen	Greene, Kelly	Greene, Scott	Greene, Solo	Greene, Susan
Greene, Terri	Greene, Vaughan	Greene, Veronica	Greenfield, James	Greenhill, Barry	Greenidge, Jennifer
Greening, Jennifer	GREENLEE, ART	Greenlee, Frances	Greenlee, Graham	Greenstein, Barry	Greenstein, Becca
Greenwald, Ken	Greenwood, David	greenwood, jean	Greenwood, Judy	Greer, Carol	Greer, Helen
Greer, John	Greetan, Josh	Greger, Sabine	Gregersen, David	Gregg, Brandon	Gregg, Georgan
GREGO, BEN	GREGO, BEN	Gregorian, Arthur	Gregory MD, Michael	Gregory, Chilton	Gregory, Dwight
Gregory, Mr. Probyn	Gregory, Nancy	Gregory, Paul	Gregory, Phyllis	Gregory, Ramsey	Gregory, Renee
Gregory, Tina	Gregory, Zulma	Greider, Peter	Greiner, Gerard	Greiner, Tony	Greinke, Pamylle
Greiss, Ms. Patricia	Gremban, Ronald	Gremminger, Elaine	Grenfell, Patricia	Grenu, Marie	Grenz, Kelsey
Gres, Wright	Gresham, Anthony	Grewal, Alex	Grey, Sylvan	grguric, jackie	Gribble, C.
Grice, Mr. Gary	Gries, Elaine	Griesen, John	Griesmeyer, Mike	Griesmeyer, Mike	Griffin, AK
Griffin, Dawn	Griffin, Denise	Griffin, Erica	Griffin, Fredric	Griffin, Georgia	Griffin, Ghia
Griffin, Glenn and Sandra	Griffin, H Ellis	Griffin, Jr., Leland	Griffin, Midge	Griffin, Pam	Griffin, Robert
Griffin, Vivian	Griffin, Vivian	Griffith, John	Griffith, Lin	Griffiths, Devin	Griffiths, Hilary
Grigoriou, Vasileios	Grigoriu, Mihai	Grigsby, Lani	Grimley, Chris	Grimm, Erica	Grimm, Peter
Grimwood, Jaime	Grin, Maria	Grinblat, Rebecca	Grinthal, Mr. Scott	Grisez, Bernard J	Grist, Linda
Griswold, Dean	Gritzka, Tom	Grix, Gisele	Grobe, Ila	Grobman, Bruce	Groeger, Tim
Groenewald, Alfred	Groh, Paul	Groh, Rand	Gronemeyer, Kim	Groner, Matt	Grose, Harriet
Groshong, Victoria	Grosjean, John	Gross, Alan	Gross, Chris	Gross, Chrissanth	Gross, Eric
Gross, Kurt	Gross, Marilyn`	Grossberg, Dan	Grossenbacher, John	grossi, nancy	Grossman, D
Grossman, Kathleen	Grossman, Laura	Grossman, Mark	Grossman, Richard	Grossman, Stacy	Grote, Harald
Grote, Sikt	Groten, Margery	Groundwater, Neil	Grovenstein, Elizabeth	Grover, Justin	Grover, Timothy
Groves, Belle	Grubb, Ms. Karen Y.	Grubb, Ruth	Grubb, Sundriya	Grubbs, Chelsea	Gruber, Kathy
Gruen, Constance	Grunbaum, Arthur	Grundy, Marty	Grunert, Brice	Grunwell, David	Grutman, Jon
Gruver, Chere	Guardado, Rochelle	Guardiola, Federico	Guarino, Dolores	guarnieri, Tony & Cindy	guarnieri, Tony & Cindy
guarnieri, Tony & Cindy	guarnieri, Tony & Cindy	guarnieri, Tony & Cindy	Guay, Ralph	Gubbels, Mark	Gubelman, Erin
Gudelanis, Mr. John	Gudiño, Pamela	Guenther, Mark	Guenther, Pat	Guernsey, Monika	Guerra, Rocio
Guerra, Tj	Guest, Rick	Guevara, Alicia	Guevara, Pedro Anillo	Guffin, Bascom	Guh, H.
Guido, Susan	Guier, Richard	Guiffrida, Pag	Guigot, Jean-Claude	Guild, Susan	Guillory, Cheryl
guimaraes, tor	Gulas, Joseph	Gulbranson, Suzanne Shourds	Gulla, Ronald	Gulledge, Nadia	Gullett, Rachel
Gulley, Jane	Gullick, Larry	Gullotta, Tana	Guma, Karen	Gump, Thomas	Gumz, Cody
Gundersen, Bruce	Gunderson, Cathy	Gundling, Cyril	Gunnarson, Martha	Gunson, Ina	Gunter, Karlene
Gunter, Malcolm	gunther, ken	Gunther, Mr. Peter	Gunther, Susan	Gupta, Deepika	Gurdin, J. Barry
Gustafsen, April	Gustafson, Charles	Gustafson, Marcy	Gustafson, Mr. Duane	Gustafson, Owen	Gustin, Amy
Gustin, Judy	Gutelius, Phyllis	Guthrie, Barrett	Guthrie, Doris	Guthrie, Elizabeth	Guthrie, John
Guthrie, Rand	Guthrie, William	gutierrez, jose	Gutierrez, Maria	Gutierrez, Mary	Gutierrez, Maximillian F. O.
Gutierrez, Melissa	Gutmann, Todd	Guttenberg, Marata	Guy, Tim	Guyard, Christine	Guyton, Cleavert
Guzmán, Genevieve	Guzman, Joseph	Gwynn, Maureen	Gyncild, Brie	Gyving, Jeff	H, Barbara

H, Lisa	H, Lisa	H, Nami	H, Will	H., Ms. C.	Ha, Katherine
Ha, Kyung-guk	Haag, Karin	haag, nancy	Haas, Robbert	Haas, Susan	Haavik, Kristof
Haavind, Robert	Habel, Laurie	Habersang, Rolf	Habrecht, Joanne	Hack, Paola	Hack, Todd
Hackett, Sandy	Hackner, Paul	Hackney, Stephen	Had, Marianne	Hadcroft, Mr. James K	Hade, Ms. Michaeline
Hadenfeldt, Dennis	Hadid, Tom	Hadley, Audrey	Hadley, Shela	haegele, william	Haemig, Lynda
Haemmerle, Joseph	Haener, Barbara	Haff, Susan	Hafner, Amanda	Hagberg, Anne	HAGELE, BOB
hagen, john	Hagen, Pamela	Hager, Mr. Jon	hagerman, deborah	Hagerman, Timothy	Hagerty, Ms. Mc
Hagewood, Steve	Haggard, Alan	Haggard, Nancy	Haggblad, Rosemary	Haggin, Lindell	Haglund, Judith
Hagopian, Pat	Hague, Stephen	Hahn, Tom	Hahus, Donna	Haigh, Susan	Haigh, Susan
Haik, Peter	Hailey, Lynn	Haim, Carla	Haimel, Katharina	Haine, Rob	Haines, Kathleen
Haines, Shauna	Haj, Karey	Hakam, Alaeddin	Hakim, Shady	Hakim, Sy	Halak, Michael
Halbert, Ellen Carol	Halbritter, Christopher	Halderman, Pat	Haldy, James	Hale, Elizabeth	Haley, A
Haley, Jim	Haley, Mary	Haley, Patty	Haley, Stacia	Haley, Twalla	Halfen, DeWayne
Hall, Dennis	Hall, Dinorah	Hall, Emily	Hall, Jan	Hall, Javene	Hall, Jean
Hall, Jennifer	Hall, Jewel	Hall, Keith	Hall, Margie	Hall, Mary Ellen	Hall, Michael
Hall, Michael	Hall, Michelle Lee	Hall, Mrs. Janice	Hall, Mrs. Janice	Hall, Nancy	Hall, Nathan
Hall, Noah	Hall, S	Hall, Stuart	Hall, Tom	Hall, Vicki	Hallbauer, Cornelia
Hall-Bodie, Adrienne	Haller, Maryann Yocum	Hallermann, Anja	Hallett, Bruce	Hallett, Matt	Halley, Jack
Halliday, Hugh	Hallman, Hollie	Hallman, Wendy	Hallmark, Kathy	Hallonquist, Robyn	Halloran, John
Halloran, Mary	Halloran, Michael	Halloran, Susan	Hallow, Leah	Halperen, Jonathan	Halpern, Lisa
Halpern, Mr. Stephen	Halpin, Gene	Halpin, Sandra	Halpin, Wanda Willey	Halsey, Mr. Chad	Halter, Pat
Haltom, D	Hamad, Hamed	Hamann, Karl	Hamel, Henry	Hamer, Collin	Hamer, Suzanne
Hamerlind, Barbara	Hamilton, Colleen	Hamilton, Cynthia	Hamilton, Darlene	Hamilton, Frederick	Hamilton, Janette
Hamilton, Joseph	Hamilton, Mr. Marvin	Hamilton, Pamela	Hamilton, Victoria	Hamlett, Mary	Hamlin, Steve
Hamm, Bill	Hammack, Sylvia	Hamman, Victoria	Hammel, Kirby	Hammer, F	Hammer, Melina
Hammond, Earlene	Hammond, Garret	hammond, kara	Hammond, Mr. Thomas P	Hammond, Ysa	Hampel, Julie
Hamper, Margaret	Hampton, Stanley	Han, Mr. Richard	Hanas, George	Hanas, George	Hance, Judith
Hancock, David	Hancock, Heath	Hancock, Peter	Hancy, April	Hand, David	Hand, Thomas
Hand, Victoria	Handeland, Ryan	Handford, Janet	Handsaker, Heidi	Haney, Jennifer	Haney, Steve
Haney, Steve	hanger, james d	Hanifan, Anastasia	Hanikka, Esa	Hanin, James	Hanke, Jack
Hankey, Mary	Hanks, Ed	Hanks-Hicks, Cheryl	Hanlon, Christine	Hanlon, Connor	Hanlon, Eileen
Hanlon, Steve	Hanmer, Melissa	Hanna, Harvey	hanna, jeannette	Hannah, Kay	Hannah, Raven
Hanna-Myrick, Mr Chuck	Hannigan, Bob	Hannon, Larry	Hannon, Loretta	Hanrahan, Debby and John	Hans, Jule
Hanse, Constantina	Hansell, Connor	Hansell, Judith	Hansen, Amber	Hansen, Connie	Hansen, Jacob
Hansen, James	Hansen, James	Hansen, Joan	Hansen, Joan	Hansen, Katherine	Hansen, Kristy
Hansen, Miranda Lee	Hansen, Morgaen	hansen, paula	Hansen, Rev. JUdith	Hansen, Robin	Hansen, Sara
Hansen, Steve	Hansen, Wendy	Hanson, Craig	Hanson, Dr. James	Hanson, Edward	Hanson, Irwin
Hanson, Kathy	Hanson, Mr. Art	Hanson, Mrs. Natalie	Hanson, Pam	Hanson, Sally	Hanson, Sally
Hanson, Sam	Hanson, Samara	Hanus, Jeffry	Happel, Charles	Harbert, Tanya	Harbin, Spencer
Harbottle, Matthew	Harbutt, Ms. Alberta	Harde, Rucha	Hardee, David	Harden, Christina	Harden, Dr. Ronald
Hardiman, G	Hardin, Karen	harding, janilyn	Harding, L	Harding, Paul	Harding, Stephen
Harding, Stephen	Hardy, Carolyn	Haren, Frank	Harger, Glenn	Hargosh, Andrew	Hargraves, Mark
Hargrove, Barbara Arko	Hargrove, Gary	Harlan, Melissa	Harling, Nathan	Harlow, Nancy	Harlow, Ryan
Harmon, Joan	Harmon, Rick	Harmon, Ruth	Harms, Kathy	Harnedy, Kacy	Harner, Ray
Haroutian, Peter	Harp, John	Harpe, Barbara	Harper, Alan	Harper, Charesa	Harper, Gretchen

Harper, Ingrid	Harper, Randy	Harper, Rebecca	Harper, Wende	Harper-Odom, Regina	HARPSTER, JASON
Harralson, David	Harrell, Bryan	Harrell, Linda	Harrell, Roger H. H	Harrer, Roger	Harrigan, Thomas
Harrington, Brad	Harrington, Nathan	Harrington, Patrick	Harrington, Rita	Harrington, Robert	Harrington-Tozzi, Alta
Harris, Brenda	Harris, Carolyn	Harris, Dick	Harris, Donna	Harris, Glenn	Harris, Glenna
Harris, Guy	Harris, Hudson	Harris, James	Harris, Jenna	Harris, Jennifer	Harris, Kate
Harris, Kymberlee	Harris, Laurel	Harris, Mark	Harris, Ms. Sharon	Harris, Rick	Harris, Ron
Harris, Steven	Harris, Susan	Harris, Suzanne	Harris, Tim	harris, tom	Harris, Willa Bing
Harrison, Annie	Harrison, Christopher	Harrison, Don	Harrison, Ellen	Harrison, Glenda	Harrison, Harry
Harrison, Helene	Harrison, Jeane	Harrison, Kenneth	Harrison, Randy	Harrison, Sally	Harrison, Shana
Harrison-Kahn, Toni	Harry, Elizabeth	Hart, Barbara	Hart, Carole	Hart, Carole	Hart, Colin
Hart, Jessica	Hart, Kathy	Hart, Kelly	Hart, Linda	Hart, Rebecca	Hart, Rick
Hart, Roxana	Hartenstine, Mr. Dennis	Hartford, Susan	Hartinger, Mathias	Hartje, Jean	Hartman, Brian
Hartman, Christine	Hartman, George	Hartman, Jason	Hartman, Jill	Hartman, Laura	hartman, Ms. nancy
Hartman, Nancy	Hartsorne, Annette	Hartung, Bridgette	Hartung, James	HARTWIG, BERNARD	Hartwig, Gaye
Harty, Florence	Harty, Florence	Hartzog, Amy	Harvey, Anne	Harvey, Bruce	hArvey, Christine
Harvey, Don	Harvey, Jef	Harvey, Jo	Harvey, Ms. Juley	Harvey, Nan	Harvey, Stephanie
Harvey, Tami	Harvey, Yvonne	Harvey-Shea, Frankie	harville, av	Hasan, Leena	Hasbach, Corinna
Haseleu, Judith	Hashem, Diane	Hashemi-Briskin, Jordan	HASHMI, margaret	Haskell, Warren	Haskett, Nancy
Haskin, Roberta	Haskins, Eric	Haskins, Lucy	Haslag, Robert	Haslam, Felix	Hassa, Mrs. Linda
Hasselbrink, Robert	Hastey, M	Hastings, Melissa	Hatch, Asuncion	Hatch, Paul	Hatcher, Cindy
Hatcher, James	Hatcher, James	Hatcher, Jim	Hatfield, Amy	Hatfield, Carol	Hatfield, Gene
Hathaway, Julia	Hathorn, Sam	Hatsis, Elaina	Hatten, Rick	Hattendorf, Ethan	Hatton, Kathleen
Hauber, Barclay	Hauch, John W	Hauck, Barbara	Hauck, Dennis	Hauck, Molly	Hauer, Martha
Hauer, Nancy	Hauge, Erik	Hauge, Jennifer	Haugen, Iver	Haugen, Iver	Haugen, Lance
Haugen, Mr. Bob	Haun, Pamela	Haupt, Carolyn	Hausemer, Pier	Hauser, Barb	hausman, benson
Havan, Ms. Artineh	Havanec, Shaun	Haven, Gary	Havener, Paul	Haverfield, Heather	Haverfield, Tiffany
Haverkamp, Kathy	Haverlock, Robert	Haviland, Ann	Havlik, Hugh	Hawblitzel, Patricia	Hawes, Beth
Hawes, Frank	Hawes, Steven	Hawkes, Glenn	Hawkesford, Sonnya	Hawkins, Denise	Hawkins, Don
Hawkins, Lauren	Hawkins, Richard	Hawkins, Richard	Hawkins, Thomas	Hawksworth, Melanie	Hawley, Crystal
Hawley, Paul	Hawley, Paul	Hawley, Richard	Haworth, Patricia	Hawthorn, Margaret	Hawthorn, Pat
Hayashi, A. T.	Haycock, Robert	Hayden, Joe	Hayden, Tiffany	Hayenga, Mr. Jon	Hayes, Girard
Hayes, Jennifer	Hayes, Leslie	Hayes, Maureen	Hayes, Morgan J	Hayes, Tom	Hayford, Carol
Haynes, Barry	Haynes, Bryan	Haynes, Janice	Hays, J.	Hays, James	Hays, P.
Hayward, Clare	Hazelwood, Mary	Hazen, Alona	hazin, imran	Hazzard, Dylon	Hdz, Marlen
Head, Carla	Head, Kris	Head, Kris	Head, Mr. Jim	Headley, Linda	Heagy, Lorraine
Heald, Mr. Mark	Heald, Mr. Mark	Heald, Mr. Mark	Healey, Shannon	Heaney, Anne	Heard, Tyler
Hearn, Dona	Hearn, Jeffrey	Hearnley, Jonathan	Hearthstone, Bonnie	Heath, Edele	Heath, Ms. Linda A.
Heath, Ruth	Heath, Suzanne	Heath, Valerie	Heathfield, MaryAnn	Heaton, Sam	Heaton, William
Heavenrich, Mr. Willis	Heavern, Gordon	Heaviland, Joy	Hebert, Joan	Heckathorn, Malia	Hector MD, Bruce
Hector, Alan	Hedal, Melissa	Hedger, Lloyd	Hedges, David	Hedio, Linda	Hedrick, Erick
Hedt, Michael	Heeg, Lisa	heermans, james	Heersma-Covert, Ms. Gini	Heersma-Covert, Ms. Gini	Heff, Reed
Heffron, Joshua	Hefner, Myra	Hefner, Myra	Hegarty, Barbara	Hegedus, Barbara	Heide, Andra
Heidger, Thomas	Heilemann, Dave	Heilman, Joan	Heimbaugh, Brook	Hein, Inez	Heinemann, Karen
Heininger, Joseph	Heino, Tom	Heinrich, Hans-Peter	Heinrichsdorff, Mr. Ava	Heintz, Penny	Heisler, Mike
Heisler, robert	Heisler, Susan	Heitz, Sharon	Helaudais, Brianne	Held, Johanna	Helfrecht, Susanne
Helinski, Marlene	Helleberg, Kenneth	Hellem, Andra	Hellen, Mary	Heller, Beth	Heller, Elizabeth

Heller, Janet	heller, jesse	Heller, Nan	Hellerman, Arlene	Helm, John	Helm, Robert
helmberger, pat	Helmen, Hank	Helmon, Mary Fay	Heloskie, Paul	Helsing, Jennifer	Helson, Robert
Helton, Mary	Helvie, Robert	Hembury, Phil	Hemingway, Carol	Hemm, James	Hemmer, John
Hemmingsen, Jim	Hempel, Candy	Hemzacek, Elizabeth	Hendel, Dale	Henderson, Carla	Henderson, David
Henderson, Lela	Henderson, Maria	Henderson, Mrs. Candee	Henderson, Nancy	Henderson, Ted	Hendler, Carol
Hendler, Carol	Hendlish, Sarah	Hendricks, Diane	Hendrickson, Alexis	Hendrickson, Nancy	Hendrickson, Ruth
Hendzel, Charles	Hengda, Dina	Hengesbaugh, Matt	Henion, Todd	Henkin, Alice	Henneman, Chip
Hennes, Jennifer	Hennessey, Chris	Henning, Brian	Henning, David	Henning, N	Henninger, Francis
Henninger, Maryann	Henrich, Dr. Alexander	Henriksen, James	Henriques, Claudio	Henry, Amy	Henry, anne
Henry, Devin	Henry, Harold	Henry, Janan	Henry, Jeff	Henry, Jeff	Hens, Charles
Hens, Wilma	Henschen, Shirley	Henshaw, Mr. Mel	Hensley, Andrew	Henson, Joey	Henson, Ms. Lana
Hepburn, Robert	Hepburn, Robert	Hepler, Margaret	Hepler, Margaret	Hepler, Myrtle	Hepler, Stuart
Hepner, Brent	Hepner, Jean	Hepner, Jean	Hepworth, Brian	Heratsch, Volkmar	Herberg, John
Herbert, Beverly	Herbert, Charles	Herbst, Tori	hercher, denise	Herfurt, Claudia	Herger, Loretta
Hergesheimer, Dorlan	Herko, Michael	Herman, Bill	Herman, Johm	Hermanns, Mr. David	Hermann-Wu, Kate
Hermes, William	Hermon, Bruce	Hermosillo, Domingo	Hernandez, Aquileo	Hernandez, Celina	Hernandez, Charles
Hernandez, James	Hernandez, Jose	Hernandez, Maria Celia	Hernandez, Maria Elena	Hernandez, Mr. Ricardo	Hernández, Raúl
Hernandez, Reynaldo	Hernandez, Steven	Herndobler, Beth	Herndon, Laura	Heron, Carrie	Heron, Joan
Herren, Doug	Herrera, Daniel	Herrera, Laura	Herrera, Ramiro	Herrick, Glenn A.	Herring, Michael Ann
Herring, Patti	Herrmann, Dorene	Herron, John	Herron-Huff, Leslie	Hersh, Paul	Herten, Margaret
Hertz, L	Hertz, Larry	Hertzberg, Kathe	Hertzog, Gary	Hervey, Jeanne	Herz,, Ph.D., Dr. Michael, J., J
Herzer, Susan	Herzog, Chantal	Heselmeyer, Rebecca	Hess, Hurd	Hess, Jeff	Hess, Matthew
Hess, Mr. John	Hess, Paul	Hess, Phyllis	Hess, William	Hessell, Bill	Hesselmann, Patrick
Hesser, Yola	Hesson, Mrs. Avril	Hestnes, Elizabeth	Hetelle, Jon	Hetlage, John	Hetze, Ken
Heuett, Athena	Heuman, Mr. Christopher	Heupel, George	Heupel, George	Hevener, Jeanne	Heverly, Craig
Hewes, William	Hewett, Heather	Hewitt, Anne-Marie	Hewitt, Carol	HEY, LISA	Heyden, Michelle
Heymann, Gary	Heymans, Mariana	Heyn, Joyce	Heywod, Anne	Heywood, Harriet	Heywood, Harriet
Heywood, Harriet	Heywood, Susan	Hiatt, Shannah	Hibshman, Mr. Steven R.	Hice, Avery	Hickey, E
Hickey, Ms. P	Hickey, Rebecca	Hickman, Autumn	Hickman, Mark	Hickner, Bernie	Hicks, Connie
Hicks, Connie	Hicks, Jerry	Hicks, Lacey	HIcks, Maureen	Hieb, Laurel	Hieber, Richard
Hieronymus, Lisa	Higgins, Andrea	Higgins, Bruce	Higgins, Chelsea	Higgins, Daniel	Higgins, James
Higgins, Martha	Higgins, Mary	Higgins, Susi	Higgs, Barbara	Higgs, Ocrun	Hightower, Michael
Hilbert, Darlene	Hildebrand, Charmaine	Hildebrand, James	Hildebrand, John	Hildebrandt, Kate	Hildebrandt, Linda
Hildebrandt, Todd	Hileman, Jacki	Hill, Alexander	Hill, Barbara	Hill, Carol	Hill, Char
Hill, Cheri	Hill, David	hill, don	Hill, Dona	Hill, Gary	Hill, Ginger
Hill, Jenny	Hill, Jerry	Hill, John	Hill, Lynn	Hill, Michael	Hill, Pam
Hill, Robert	Hill, Sheri	Hill, Tim	Hill, Tina	Hillard, Dale	Hillen, Melissa
Hiller, Brigitte	Hillerstrom, Sandra	Hillier, Trisha	Hillman, Elizabeth	Hills, Jo	Hills, Rev. Gordon
Hills, Rev. Gordon	Hills, Sally	Hiltner, Carol	Hilton, Charles	Hilyer, Samantha	Hinckley, Arline
Hinckley, Charlene	Hinckley, Mrs. Frances	Hind, Mr. David	Hindley, Dan	Hindley, Judy	Hinds, Minori
Hinds, Minori	Hindson, Terry	Hines, Dolores	Hines, Dolores	Hines, Lanier	hines, norman
Hink, Lani	Hink, Lani	Hink, Lani	Hinkle, Phil	Hinkson, William Harold II	Hinman, Mark
Hinnrichs-Dahms, Holly	Hinojosa, Bridget	Hinshaw, Tammera	Hinton, Karla	Hinton, Matthew	Hipp, James
Hirsch, Deborah	Hirsch, Harriet Jean	Hirsch, Matthew	Hirsch, Robin	Hirschi, Jill	Hirsh, Sally
Hirsig, Carolyn	Hirt, Deb	Hirth, Carol	Hissam, Timothy	Hitchcock, Brian	Hites-Clabaugh, Lucinda

Hively, Deborah	Hix, Hildegard	Hixson, Taylot	Hladky, Mrs. Christa	hlat, Mr. mike	hlat, Mr. mike
Hnath, Daniel	Hnatowich, Donald	Ho, Ted	Hoaglin, Dianne	Hoaglund, Maria	Hoar, Martha F.
Hobbensiefken, Diane	Hobbs, Carol	Hobbs, Jana	Hobbs, Leonard	Hobbs, Robert	hobson, kelvin
Hoch, Lisa	Hochberg, Mrs. Adrienne	Hochheiser, Dr. Harry	Hockney, Natasha	Hodes, Mr. Harold T.	Hodges, Andrea
Hodges, Jamie	Hodges, Suzanne	Hodgin, Terry	Hodgin, Terry	Hodgins, Jean	Hodgkins, Yvonne
Hodgkiss, Nicolene	HODIE, JAKE	Hodovan, Francine	Hodson, Manda	Hoefler, Janine	Hoegler, Jean
Hoehn, Albert and Betty	Hoehne, Angela	HOEKSEMA, BRUCE	Hoelke, Steve	Hoenig, Irwin	Hoerlein, Sara
Hoerner, Dennis	Hoernig, Lauren	Hoess, Joseph	Hof, Steph	Hoff, Marilyn	Hoff, Marsha
Hoffenberg, Ann	Hoffer-Steiman, Bonnie	Hoffman, Andrew	Hoffman, Dr. Steven	HOFFMAN, JANICE	Hoffman, Marianne
Hoffman, Nancy	Hoffman, Norman	Hoffman, Sue	Hoffman, Ted	Hoffman, Wendy	Hoffmann, Deborah
Hoffmann, Heidi	Hofheins, Paul	Hogan, Blithe	Hogan, Cary	Hogan, Eugene	Hogan, John
Hogan, Karen Y	Hogan, Linda	hogan, rachael	Hogan, Randolph	Hogan, Randolph	Hohenshelt, Ms. Felicity
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Holden, Douglas	Holden, Eileen	Holden, Suzanne	Holder, Chris	Holder, Deb	Holder, Lehman
Holder, Sarah	Holdread, Joyce E.	Holdren, JoAnn	Hole, Jennifer	Holford, Sharon	Hollahan, James
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Hollington, Jason W	Hollinrake, Mark	Hollins, Janet	Hollis, Jacqueline	Hollis, Kilah	Hollon, Leanna
Holloway, Jim	Holloway, Pamela	Holloway, Pat	Holloway, Sandy	Hollyfield, Ms. Ann	Holm, Sam
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Holmes, Lorna	Holmes, Reva	Holmes, Robert	Holmes, Tom	Holsnijders, Luuk	Holstein, Suzy Clarkson
Holt, A	Holt, Alan	Holt, Catharine	Holt, Randi	Holt, Raymond	Holt, Sian
Holtz, Eric	Holtzclaw, Dr. John	Holtzman, Dorothy	Holtzman, Lawrence	Holtzmuller, Sandra	Holzman, Mrs. Wendy
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Hooper, John	Hooper, Margaret	Hoover, Michael	Hoover-Dempsey, Kathy	Hope, David	Hope, Holly
Hope, Phillip	Hope, Sue	Hopkins, Charley	Hopkins, John	Hopkins, Lisa	Hopkins, Mr. Jeff
Hopkins, Tom	Hopkins, Tom	Hoppe, Brian	Hoppenbrouwers, Elke	Hopper, Sarah	Hoppmann, Sandra
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Horowitz, Laura	Horowitz, Ms. Tina	Horsley, Paul	horst, oren	Horstmann, Justin	Horta, Joseph
Horton, Jeffrey	Horton, Keith	Horton, Larry horton	Horton, Michael	Horvat, Sabolch	Horwitz, Eric
Hosek, Ruth	Hoskin, Cornelia	HOSKING, DAN	Hosmann, Vaughn	Hosp, William	Hossli, Jerome
Hostetler, Barbara	Hostetler, Jerry	Hostetter, Alethia	Hotchkiss, Karen	Houdashelt, Mark	Hough, Barbara
Hough, Laura	Hougham, Tom	Houghtaling, Leonard	Houghton, Abigail	Houghton, Randall	Hougland, Kenneth
Houlton, Simon	Houppert, Levi	Houpt, Renee	House, Martin	House, Michael	House, Nevin
House, Tom	Houseman, David	Houser, Brian	Houser, Ruth	Houseworth, Bradley	Houston, Jynx
Houston, Meghan	Houten, Ms. Corinne Van	Hovekamp, Larry	Hoven, Debra	Hovey, Roseanne	Howard, Andrea
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Howard, Frances	Howard, Gloria J	Howard, Jeanne	Howard, Jessica	Howard, Karen	Howard, Kristen
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Howard, Sully	Howard-Comber, Katharine	Howd, Jen	howe, duane	Howe, Elaine	Howe, George
Howell, Darliene	Howell, Lisa	Howerton, Neal	Howes, Abigail	Howlett, Ariel	Hoyle, Cherie
Hoyle, Judy	Hric, John	Hristova, Plama	Hromada, Barbara	Hromoko, Mishel	Hsia, Yujen

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Hubert, Ron	Huckins, Harald	Hudak, Sharon	Huddleston, Mark	Huddleston, Molly	Huddy, Paul
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Hudson, Kay	Hudson, Michelle	Hudson, Robin	Huebner, David	Huelsberg, Carole	Huenefeld, Mary-Alyce
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Hughes, Chris	Hughes, Daniel	Hughes, Deb	Hughes, Elaine	Hughes, James	Hughes, Jan
Hughes, Kevin	Hughes, Laurel	Hughes, Lisa	Hughes, Mr. Joe	hughes, Ms. liz	Hughes, Sharlee
Hughes, Tennielle	hughes, vicki	Hughto, Karen	Huguley, Bill	Huibregtse, Ms. Anne	Hull, Carrol
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Humphrey, Jim	Humphrey, Linda	Humphrey, Seth	Humphreys, Marla	Humphries, Angela	Humphries, John
Humphries, Sandra	Hun, Charles	Hunkin, Therese	hunkler, lisa	Hunnicut, Jordan	Hunnicutt, Frank
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Hunt, Obie	Hunter, Barbara	Hunter, Chris	Hunter, Don	Hunter, Eileen	Hunter, Jacki
Hunter, Jim	hunter, john	Hunter, Karen	Hunter, Nan	Hunter, Suzanne	Hunthausen, Edna
Huntley, Kathryn	Huntoon, Kristin	Huntoon, Kristin	Huntsinger, Fred	Huq, Rehana	Hurd, John
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Husk, Laurel	Huskins, Shirley	Huskisson, Irene	Hussenbux, Marian	Hustava, Theodore	Hustedde, Gail
Huston, Josh	Hutcherson, Kim	Hutchin, Kristine	Hutchings, Lee	Hutchings, William	Hutchins IV, Donald E.
Hutchins, Colleen	Hutchins, Joe	Hutchins, K	Hutchins, Katherine	Hutchins, Tiffany	Hutchinson, Bryce
hutchison, jj	Huth, Graciela	Hutt, Evelyn	Hutter, Danielle	Huttner, Elodie	Hutton, Carol
Hutton, Joan	Hutton, Joann	Hutton, Thomas	Huxley, Frederica	Huynh, Cali	Hvolbeck, Judy
Hvoslef, Erik	Hyatt, Stuart	Hyche, Kenneth	Hydar, John	Hyde, Mr David	Hyett, Catherine
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Incze, Leisha	Ingel, Tuule	Ingham, Anitra	Ingham, Lula Kay (Katie)	Ingle, Evan	Ingram, Carole
Ingram, Sj	inlender, rosina	Inman, Joan	Innis, Jennifer	Insley, Rev. Connie	Iocco, Anne
Ionescu, Valentin	Iosif, Katherine	Iovino, Teresa	Iqbal, Mary	Irish, Debora	Irish, Patty
Irvin, Yvonne	Irving, Mark	Irwin, Benjamin	Irwin, Kelly	Isaacs, Mark	Isbell, Eugenia
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Italiano, Corinne	Itkin, Howard	Itule, Norma	Ivers, Mary	Iverson, Dehra	Iverson, Florence
Iverson, Gregory	Iverson, Steve	Ives, Ron	Ives, Wendy	Ivey, Cheryl	Ivey, Marjorie
Ivzhich, Vladimir	Izzo, Martha	J, Danielle	Jablonka, Thomas	Jache, Elizabeth	Jachimiak, James
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Jackson, J.f.	Jackson, Jenice	Jackson, Judy	Jackson, Ken	Jackson, Ms. Dorothy	Jackson, Neil
Jackson, Phillip	Jackson, Rena	Jacob, April	Jacob, Linda	Jacob, Mel	Jacob, Su
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Jacobs, Vincent	Jacobson, Addie	Jacobson, Don	Jacobson, Patricia	Jacoby, Jacqueline	Jacoby, Thomas
Jaeger, Dannielle	Jaeger, Inga	Jaehnig, Walter	Jaerling, Petra	Jager, Marthea	Jagiello, Carol
Jago, Donna	Jahnel, Nancy	Jain, Shilpa	Jain, Shreshtha	Jaipaul, Inderjit	Jairazbhoy, Nish

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Jamar, Isalien	James, C	James, Chris	James, Dennis	James, Lorren	James, Michael
James, Simon	James-Deramo, Michael	Jamieson, Ellen	Jamison, M.	Jamison, Vanessa	Jammal, Anthony
Jamtaas, Philip	Janecke, Kevin	Janetzko, Robert	Janjic, Marija	Jannicelli, Barbara	Jansen-Alblas, Ineke
Janssen, Dale	janty, eric	Janusko, Robert and Donna	Janzen, Ms. Gayle	Jarboe, JoLynn	Jaremko, Jennifer
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Jarvis, Paul	Jarvis, S.	Jarvis-Lefebvre, Barbara	Jasaitis, Anthony	Jaske, Cindy	jaskowiak, william
Jasper, Alan	jastromb, virginia	Jastromb, William	Jaszczerski, Carla	Jatinen, Jane	Jaunakais, Maria
Jay, Clifford	jay, shara	Jaye, Karen	Jayne, Catherine	Jayne, Peggy	Jean, Marilyn
jefferson, nyla	Jeffery, Katheryn	Jeffrey, James	jeffrey, monroe edwin	Jeffries, Mr. T	Jehn, Robert
Jellison, Morgan	jena, alice	Jeneski, Joanne	Jenkins, Charles	Jenkins, Daniel	Jenkins, Derrick
jenkins, donna	Jenkins, Jake	Jenkins, Janet	Jenkins, Jeffrey	Jenkins, Mark	Jenkins, Robin
Jenkins, Shelton	Jenkins, Stacey	Jenne, Karen	Jennejahn, Jennifer	Jenner, Mr. Douglas R R	Jennings, Denise
Jennings, Emma	Jennings, Linda	Jennings, Scott	Jennings, Travis	Jensen, Cornelia	Jensen, Donna
Jensen, Gayle	Jensen, Judy	Jensen, Karen	Jensen, Mary	Jensen, Rebecca	Jensen, Richard
Jeppson, Deborah	Jerome, Anna	Jersett, Melissa	Jessa, Sapna	Jessen, Ellen	jessler, darynne
jessler, darynne	Jessup, Darren	Jessup, Ms. Nicole	Jessup, P	Jeter, Randal	Jett, Alexandra
Jett, Sue	Jettmar, Karen	Jetty, Charles	Jevric, Virginia	Jewell, Leigh	Jewell, Sheena
jewkes, rosemary	Jezorek, Heather	Jighira, Liliana	Jimenez, Nathan	Jimenez, Salvador Gomez	Jinn, Nicole
Jinn, Nicole	jinxhydeman, jinx	Jirik, Paulissa	Joannou Jr, Benjamin	Joaquin, Claire	Jobe, Cindie
Jobling, Catherine	Joe, Lawrence	Joel, Gregory	Jogerst, Joachim Rochus	Johanson, Erica	John, Anne-Katrin
John, Matthew	Johns, Bob	Johns, Kim	Johns, Lorraine	Johnsen, Harold	Johnsen, Harold
Johnsen, Jenet	Johnsen, Teresa	Johnson, Adam	Johnson, Alvin	Johnson, Anne	Johnson, Ashlee
Johnson, B	Johnson, Barry	Johnson, Ben	Johnson, Billy	Johnson, Brett	Johnson, Bruce
Johnson, Bruce	Johnson, Candace	Johnson, Carol	Johnson, Cecilia	Johnson, Cher	Johnson, Cheri
Johnson, Cindy	Johnson, Clay	Johnson, Cliff	Johnson, Colleen	Johnson, DaviD	Johnson, David
Johnson, Dean	Johnson, DeDe	Johnson, Dorothy-Anne	Johnson, Dwight	Johnson, Edwin	Johnson, Ellen
Johnson, Elsa	Johnson, Emily	Johnson, Erik	Johnson, Esther	Johnson, Heidi	Johnson, Jacob
Johnson, James D	Johnson, Jeanne	Johnson, John	Johnson, Katharine B.	Johnson, Katherine	Johnson, Keith
Johnson, Kenneth W	Johnson, Kent	Johnson, Kristin	Johnson, Kristin	Johnson, Kristy	Johnson, Lainey
Johnson, Lars	Johnson, Leigh	Johnson, Leon	Johnson, Linda	Johnson, Linda	Johnson, Logan
Johnson, Louise	Johnson, Lynne	Johnson, Marva Ann	Johnson, MaryAnn	Johnson, Matt	Johnson, Mike
Johnson, Mr. Chad	JOHNSON, Natalie	Johnson, Nicole	Johnson, Pat	Johnson, Patrice	Johnson, Paula
Johnson, Perry	Johnson, Philip T	Johnson, R Roy	Johnson, Randy	Johnson, Rheta	Johnson, Rhonda
Johnson, Richard	Johnson, Richard	Johnson, Robert	Johnson, Robert	Johnson, Samantha-Rose	Johnson, Sheilla
Johnson, Shelley	Johnson, Shirley	Johnson, Sonja	Johnson, Steve	Johnson, Terrance	Johnson, Terry
Johnson, Terry	Johnson, Tim	Johnson, Yvonne	Johnston, James	Johnston, Lloyd	Johnston, Michael A.
Johnston, Stephen	Johnston, Steve	JOHNSTONE-MOSHER, ZSA	Jolicoeur, Alaine	Jolley, Julie	Jolliff, Joyce
Jolly, Brad	Joly, Frederique	Jonas, Otmar	Jones III, William	Jones, Allison	Jones, Andrea
Jones, Angela	Jones, Avianna	Jones, Catherine	Jones, Claude	Jones, Clayton	Jones, Devon
Jones, Dorothy	Jones, Dr, Virginia	Jones, Dr, Virginia	Jones, Dylan	Jones, Gary	Jones, Gene
Jones, Helen	Jones, Janie	Jones, Jay	Jones, Jeffrey	Jones, Jeffrey	Jones, Jenny
jones, joan	Jones, John	Jones, Joycetta	Jones, Karen	Jones, Kevin	Jones, Leslie
Jones, Libby	Jones, Linnis	Jones, Mark	Jones, Mitzi	Jones, Patricia	Jones, Robert
Jones, Robert	Jones, Robert	Jones, Roslyn	Jones, Sandra L.	Jones, Troy	Jones, V and B
Jones, Valerie	Jones, Zack	jongsma, kathy	Jonu, Al	Joos, Sandra	Jordan, Dr. James
Jordan, James	Jordan, Lee	Jordan, Michael	Jordan, Mrs. Lois	Jordan, Nancy	Jordan, Nancy
jorgensen, alena	Jorgensen, Wendy	Jorgenson, Lisa	Jory, Susan	Joscelyn, Shelly	Joseph, Ann
Joseph, Anthony	Joseph, Cathleen	Joseph, Erasmo	Josephs, Andrew	Josephs, Emmy	josephs, lawrence
Josephs, Robert	Joslin, Karen	Joubert, Francis and Mary	Journet, Mr. Alan	Jovanovic, Mira	Joy, Amber
Joy, Gilligan	Joy, Graham	Joy, Mark	Joyner, Joe	Juba, Anne	Juch, Holly
Judson, Arnold	Judy, Angela	Juhl, Brandon	Juhl, Esther	Juhre, Sue	Julakanti, Shanthan
Julian, Mary Ellen	Julien, James	Julison, Tim	Jump, Robert	June, Doris S.	Junod, Nora

Juran, Bonnie	Juras, Randy	Jurczewski, Carol	Jurczyk, David	Jurs, Laurie	Jursa, Rob
Justice, Jolayne	Justin, Randi	Justus-Rusconi, Valerie	Juvet, Elizabeth	k, Brit	k, c
K, Ed	K, Jo	k, marcy	k, rosemarie	K, Taryn	K., Susan
Kabba, Haja	Kachook, Olga	Kadane, Edward	Kaenzig, Herbert	Kaenzig, Herbert	Kafka, Mo
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Kahigian, Peter	Kahigian, Peter	Kahn, Brigitta	Kain, Jennifer	Kaine, Betty	Kaiser, Maxine
Kaiser, Robert	Kalamarz, Mary Ann	Kaleel, Joseph	Kalenich-Pace, Arleen	Kalinowski, Mary	Kalinowski, Michael
Kalinski, Ray	Kalish, Lois	Kallay, Joan	Kallechey, David	Kallenbach, Cheryl	Kallgren, Tiffany
Kalousi, Maria	Kamalie, Jason	Kamarainen, Sharon	Kamen, Gary	Kammann, Sandra	Kamrath, Henry
Kanavy, Patricia	Kandinsky, Mischa	Kane, Catherine	Kane, janelle	Kane, John L.	Kane, Mike
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kaplan, adam	Kaplan, Dennis	kaplan, gabriela	Kaplan, Joan	Kaplan, Muriel	Kaplan, Paulette
Kaplar, Mary	Kappel, Catherine	Kappus, Mike	Karagedik, Sevda	Karan, Elizabeth	Karan, Ken
Karbhari, Corinne	Karel, Laura J	Karenovics, Gottfried	Karges, Steve	Karimova, Regina	karkruff, lee
Karl, Alex	Karlin, Christopher	Karlson, David	karlson, fred	Karlsson, Edward	Karnes, Sarah
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kaufman, laura	Kaufman, Ronald	Kaufmann, Karen	kaur, chenie	Kaushik, Nagender	Kavanagh, Amanda
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Kavanaugh, Lisa	Kavanaugh, Michael	Kavanaugh, Michael	Kavar, Mojca	Kaveler, Phil	Kavulakian, Tomas
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kayle, jennifer	Kaylor, Jody	Kayne, Abraham	Kazak, Ilene	Kazantzi, Lily	Kazmierczak, Stephen
Kean, Diane	Kean, Nancy	Keane, Diana	Kearney, Christopher	Kearney, Joyce	Kearney, Linda
Kearns, Meredith	Kearns, Patric	Keating, Tim	Keaton, Patricia	Keck, Vickie	Keckler, Jeanne
Kedderis, Pamela	Keefe, Chris	Keefe, John M	Keefe, Martha	Keefer, Neal	Keefer, Richard
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Keils, Mary	Keim, Gary	Keim, Steve	Keir, Claire	Keir, Gary	keisch, kelley
keisch, kelley	Keiser, John	Keiser, Mr. John	Keiser, Patrick	Keiser, Peter J.	Keisner, Cheri
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Kelech, Susan	Keleti, Dr. Steven	Keller, Carol	Keller, Daniel	Keller, Dennis	Keller, Gerald
Keller, Robert	Keller, Robert	Keller, Sue	Keller, Trent	Kellerman, Elaine	Kellermann, Thomasin
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Kelley, Mary	Kelley, Michele	Kelley, Patsy	Kellman, Cindy	Kelly, Ann	kelly, bev
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Kempf, Victoria	Kemple, Jason	Kendall, Donna	Kendall, Gregory	Kendall, Patricia	Kendon, Heather
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Kennedy, Eileen	Kennedy, Eileen	Kennedy, Mark	Kennedy, Megan	Kennedy, Mike	Kennedy, Miriam
Kennedy, Sarah	Kennedy, Tom	Kennedy, William	Kennet, Bob	Kenney, Patricia	Kenney, Sherri
Kennison, Barbara	Kenny, Michael	Kensinger, Kim	Kent, Barbara	Kent, David	Kent, Diane

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Kindblad, Lisa	Kindlmann, Marcia	King, Amie	King, Barbara	King, Cathy	King, Christen
King, Dwayne	King, Fawn	King, Gabrielle	King, George	King, Hardin	King, Jean
King, Justine	King, K	King, Karen	King, Kate	king, kathleen	King, Kelly
King, Kevin	king, kj	King, Margaret B	King, Marguerite	King, Mark	King, Marsha
King, Mary	King, Robert	King, Ryan	King, Shelley	King, Stephen	King, Tammy
King, Tim	Kingsley, Christopher	Kingsley, Katie	Kingston, Andrea	Kingston, Bill	Kinnaird, Douglas
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Lyle, K	Lyle, K	Lyles, Tommye	Lyman, Richard	Lyman, Teresa	Lynch, Charles
Lynch, Chris	Lynch, Gail	Lynch, Jaremy	Lynch, John	Lynch, John	Lynch, Lynda

Lynch, Michael	Lynch, Theresa	Lynley, Lauren	Lynn, Bethany	Lynn, Dawn	Lynn, Mrs. Sandy
Lynn, Ms. Sandra	Lynn, Sheelagh	Lynn, Stuart	Lynott-Carroll, Lisa	Lynxwiler, Mike	Lyon, Angela Treat
Lyon, Anne	Lyon, Billie	Lyon, Ms. Kelly	Lyon, Nancy	Lyon, R. Terry	Lyon, Sally
Lyon, Shawn	Lyons, Jeremy	Lyons, Joseph	Lyons, Laura	Lyons, Robert	Lytle, Denise
Lytle, Gail	M, Ann	M, Bob	M, Cayla	m, Eileen	m, kay
M, M	M, Megan	M, Mike	M, Phil	M, Rachelle	M, Robin
M, Sam	M, Shawn	M, Stephanie	M., Amy	M., Danny	M., Evie
M., Henry	M., K.	M., Ms. Suzanne	Maani, Michelle	Maarouf, Simone	Mabie, Jared
Mabry, Toni	Mac Reamoinn, Laoise	MacAlpine, Gordon	MacArthur, Alison	MacArthur, Laurie	Macartney, Bill
Macaulay, Janice	MacAvery, Tristan	Maccarone, Greg	MacComb, Alan	Macdonald, Bc	MacDonald, Beth
Macdonald, Jane	Macdonald, John	Macdonald, Kevin	MacDonald, M. Segura	MacDonald, Nilah M.	Macdonald, Pam
MacDougall, Scott	Mace, Charles	mace, pat	MacFadyen, John	Macfarland, J	MacGillivray, Nancy
MacGregor, Susan	MacGuire, Michael	Machen, Peter	Machuca, Nicholas	Macias, Martha	MacInnes, Brenda
Mack, Alan	Mack, Jean	Mack, Kim	Mack, Shelley	Mackay, Camille	Mackay, Daniel
MacKay, Leslie	Macke, Barbara	MacKelvie, Elizabeth	MacKenzie, Laurie	Mackenzie, Michelle	Mackey, Angie
Mackey, Melvin	Mackie, Craig	Mackie, Jack	mackin, linda	MacKinnon, Ann	MacKinnon, Bonnie Lynn
Mackler, Donald	Mackura, Patricia	Maclean, Rebecca	Maclean, Rebecca	Maclean, Rebecca	MacLeman, Linda
MacLennan, Lynn	Macleod, Katherine	MacLeod, Ms. Dianna	Macleod, Pascale	MacNeil, d'Anne	MacNeil, Elizabeth
Macool, Jim	MacPhail, Kristyn	MacRae, Diann	MacRae, Ellen	MacRae, Family	MacRaith, Bonnie
MacWaters, Laura	MacWilliams, Jan	Macy, Michelle K	Madden, Damian	Madden, Fred	Maddigan, A
Maddigan, B	Maddock, Marcia	Maddox, Kim	Maddox, Kim	Maddux, Carolyn	Maddux, Daniel
Madeco-Smith, Mary	Madeleine, Lenore	Madigan, Jill	Madigan, Joseph	Madigan, Mary	Madill, Griffin
Madison, Gail	Madrone, Ms. Calli	Madsen, Lisa	Madzik, Paul	Magaña, Zoraida	Magarity, Barbara
Magee, Em	Magee, John	Magee, Roger	Magee, William	Magers, Eric	Magers, Eric
Magers, Eric	Magers, Eric	Magers, Eric	Magers, Eric	Magers, Eric	Magers, Eric
Magers, Eric	Magers, Eric	Magers, Eric	Magers, Eric	maggard, lish	Maggied, Mr. Michael
Maggs, Susie Hannam	Magid, Monte	Maginniss, Thomas	Maglione, Jude	Magnee, Lauren	Magner, Loretta
Magner, Millie	Magnifico, Alecia	Magrath, Pat	Magraw, Dean	Mahaux, Sylviane	Maher, Linda
Maher, Tim	Mahler, Dorina	Mahoney, Ann	Mahoney, David	Mahoney, Gerald	Mahoney, John
Mahoney, Mary	Mahony, Debra	Mahony, Kathleen	Mahowald, Mary	Mai, Catherine	Maida, Christopher
Maier, Greg	Maier, Joann	Maier, Korin	Maier, Marie	Maier, Marie	Mainelli, Margaret
Mainz, Aaron	Maisky, Lily	Maizel, Yefim	Maizel, Yefim	Majercsik, Valerie	Majerowicz, Eugene
majersky, matt	Majors, Kat	Maker, Dr. Janet	Maki, Linda	Maki, Robert	Malabrigo, Victoria
Malcolm, Karen Kravcov	Maldonado, Jackie	Malecki, Jessie	Maletsky, Susan	Maliagros, Margie	Malick, Justin
Malin, Catherine	Malina, Matt	Malkis, Allan	mallach, lawrence	Mallatt, Paul	Mallett, Barbara
Mallory, Charlotte	Mallory, Charlotte	Mallory, Jesse	Mallory, Nancy	Malmberg, Johan	Malmquist, Virginia
Malnati, Peggy	Maloan, Liz	Malone, Carolyn	Malone, Chris	Malone, Marsha	Malone, Stacey
Maloney, Charlotte	Maloney, Matthew	Malotte, Mary Parker	malsheimer, fran	Maltz, Brenda	Malvone, Janet
malyon, hilary	Mamoyac, Joy	Manalang, Irene	Manaster, Pat	Mancini, Jennifer	Mancini, Melissa
Mancuso, Erica	Mandalia, Dharmesh	Mandell, Mr. Peter	Manderscheid, B.	Mandler, James	Mangels, Ms Melanie
Mango, Jack	Mangus, Tracey	Manina, R	Maniscalco, Michele	Mankad, Anuj	Manley, Paula
Mann, Edith	Mann, Fred	Mann, Fred	Mann, Lisa	Mann, Michelle	Mann, Ms. Louise
Mann, Robert	Mann, Sandra	Manne, Noah	Mannering, Natalie	Manning, Allison	Manning, J
Manning, Russ	Mannino, Angela	Mannion, Debbie	Mannise, Lourdes	Manookian, Judith	Manser, Rhonda
Manser, William	Mansfield, Claudia	Mansfield, Mark	Mansfield, Richard	Manske, Amber	Mansker, Elanos
Manson, Deborah	Mantoiu, Manuela	Manuel-miller, Mary	Manupella, Mary	Manzini, Dulce	Maples, Cheryl
Mapps, Cathy	Mapus, Erika	Mara, Leo	Marak, Valerie	Marano, Ms. Gina	Marantz, Mady

Maras, Matt	Marasco, Summer	marcasciano, cat	Marceau, Benoit	Marchand, Babs	Marchese, Ms Marion
Marchetti, Donna	Marchetti, Donna	marciano, Dorothy	Marcille, Christopher	Marcoe, Barbara	Marcus, Chris A.
Marcus, Leonard	Marcus, Mel	Marczak, Holly	Marczyk, Cathy	Marella, Francis	Margason, carol
Margerum, John	Margolis, Laurence	Margulies, Lee	Margulis, Michael	Mariani, Louis	Marienau, Suzanne
Maries, Adrian	Marincovich, Nicolas	Marino, Amy	Marish, Elka	Maristo, Leena	Mark, Susan
Markel, Stephen	Markgraf, Steven	Markham, John	Markillie, Paul	Markley, Cynthia	Markley, Marilyn
Markley, Shannon	Markovich, Jodee	Markowe, Tina	Markowitz, John	Marks, Elise	Marks, Gail
Marks, Jeremy Nathan	Marks, Kelly	Markwich, Mindy	Marmor, Loretta	Marner, Eugene	Marone, Sally
Maros, Andras	Marr, Anna	Marr, Doug	Marr, Michael	marr, sandra	Marriner, Sue
Marrington, Lindy	Marroquin, Toni	Marrs, Leona	Marrs, Marie	Marrs, Randy	Marsala, Joe
Marschall, Sally	Marsden, Jim	Marsh, Claire	Marsh, Gene	Marsh, Marion	Marsh, Ms. Sherry J
Marshall, Carol	Marshall, Caroline	Marshall, John	marshall, john	marshall, john	Marshall, Liz
Marshall, Nancy	Marshall, Raymond	Marshall, Rebecca	Marshall, Richard	Marshall, Rowena	Marshall, Taylor
Marshall, Toni	Marshland, Susanna	Marszalek, Theodore	Martarelli, Daniele	Martel, Elizabeth	Martell, Anderon
Martellaro, Karen	Martello, Len	Martens, Bill	Martens, Linda	Marthaller, Joyce	Martin, A
Martin, Arnold	Martin, Barbara	Martin, Ben	Martin, Ben	Martin, Candice	Martin, Carson
Martin, Celia	Martin, Chloe	Martin, Chris	Martin, Craig	Martin, David	Martin, Deborah
Martin, Edwin	Martin, Frances	Martin, Gerry	Martin, Jeanne C	Martin, Jeff	Martin, John
Martin, John	Martin, Judith	Martin, Julie	Martin, Kai	Martin, Kathleen	Martin, Kathryn
Martin, Larry	Martin, Mary	Martin, Melissa	Martin, Michael	Martin, Michael	Martin, Mrs. Mary
Martin, Ms. Scott & Patti	Martin, Nancy	Martin, Omar	Martin, Pamela	Martin, Patti	Martin, Paul
Martin, Paul	Martin, Paul	Martin, Richard	Martin, Sheila	Martin, Stephen	Martin, Vicki
Martin,, Ph.D., Dr. David, L., L.	Martindale, Pamela	Martineau, Alice Anne	Martinez, Claudia	Martinez, Claudia	Martinez, Jackie
Martinez, John	Martinez, Justin	Martinez, LeRoy	Martinez, Marta	Martinez, Pete	Martinez, Sidney
Martini, Michael	Martinko, Kelly	Martino, Irmgard	Martinsen, Brian	Martinson, Julianne	Martinson, Linda
Martire, R	Marts, Pepper	Martz, Tim	Maruschak, Walt	Marvin, Cindy	Marvin, Ian
Marwood, Frank	Marx, Thomas	Marzani, Daniel	Masani-Manuel, Nzingha	Masar, Jacki	Masco, Jeffrey
Masdon, Benny	Maseda-Gille, Sheila	Maseduca, Heidi	Masheder, Ms. JIva	Masheder, Ms. JIva	Maslana, Daniel
Mason, Chase	Mason, David	Mason, Dawn	Mason, Elliot C	Mason, Lorraine	Mason, Marcie
Mason, Margaret	Mason, Mary M.	Mason, Maryann	Mason, Mrs. Marilyn	Mason, Terri	Mason, Troy
Masoncup, Ande	Mason-Sherwood, Teddy	Masotti, Katherine	Massa, Alison	massa, joseph	Massar, Marc
Massaro, John	Massaro, Sherry	Massengill, Phil	MASSETTI, J.	massey, carolyn	Massey, Eileen
Massey, Linda	Masson, Anne	Mast, Jim	masters, clayton	Masters, Gerald	masters, kanta
Masters, Linda	Masters, Mary	Mastrodemos, Nikos	Mastrodemos, Nikos	Mastrototaro, Domenico	Masuda, Carol
Masuda, Carol	Matagi, Linda	Mateas, Lisa	Mateo, Beatriz	Matern, Lauren	Matero, E Suzan
Mather, E	Mather, Gaia	Mather-Lees, Stephen	Mathers, Daniel	Mathes, Barb	Mathes, Barb
Matheson, Hedda	Matheson, Sandra	mathew, victoria	Mathews, Adam	Mathews, Bob	Mathews, Holger
Mathews, Mrs. Mary	Mathewson, Beth	Mathison, Marcia	Matlack, Lou	Matlin, Ms. Thelma	Matos, Bayrex
Matriscino, Patrick	Matson, Cheryl	Matson, Melanie	Matsui, Vicky	Matsuzaki, Bob	Mattan, Steve
Mattei, Eric	Mattell, M	Matthews, Clyde-Linda	Matthews, Dave	Matthews, Larissa	Matthews, Nancy
Matthias, Jonelle	Matthies, Andrea	Mattin, Gary	Mattingly, Gloria	Mattingly, Ms. Michele	Mattingly, Ms. Michele
Mattocks, Kurt	Mattson, Virginia	Maturen, Virginia	Matwichuk, Gail	matz, pat	Mauney, Ken
Maupin, Dr. Edward	Maupin, Jane	Maurer, Denise	Maurer, J	Maurer, J	Maurer, Laurel
Mauri, Sarah	Maurice, Ken	Maurin, Dr. Margaret S.	Mavrovitis, Leo	Mawhorter, Jerry	Max, Judith
Maxa, Karen	maxfield, casee	Maxfield, Randy	Maxfield, Tania	Maxim, Borka	Maxim, Borka
Maxim, Borka	Maxwell, Roger	Maxwell, Van	May, Annie	May, Dave	May, David

May, Dorian	May, Gerald	May, Geraldine	May, Hildy	May, Joseph	May, Joseph
May, Karen	May, Katherine	may, m	May, Melissa	Maya, Ms	Maya, Tabitha
Maybo, Michael	Maybo, Michael	Maybury, Andy	Mayeda, Lynn	Mayer, D.	Mayer, David
Mayer, Karen	Mayer, Karen	Mayers, Bill	Mayers, Marilyn Mayers	Mayes, Peter	Mayhew, Dana
Mayhew, dorothy	Maynard, Robert	Mayne, Don	Mayor, Jennifer	Mayr, Belkiss	Mays, Teresa
Mayville, LaDene	Maywald, Persephone	Mazhnyy, Mark	Mazias, Melissa	Mazuji, Nasrin	Mazulewicz, Jake
Mazur, Marilyn	Mazuzan, Marilyn	Mazzocco, Kevin	Mbayo, Edna	Mc Connell, B.Ed., M.Ed., P.P.C. Rod E.	Mc Dermott, Robert
Mcaliley, Caroline	McAlister, Kevin W.	McAllister, Alan	McAllister, Pamela	McAllister, Robert W	McAlonan, Jane
McAnanama, Joseph	McANULTY, David	McArdle, Penny	McArdle, Struan	McAskill, Sophia	McAvery, Maryjon
McAvoy, Anne	McBrayer, Michele	McBride, Anne	McBRIDE, Casey	McBride, D.	McBride, Jane
McBride, Mary	McBride, Mary	McBride, Robert	McBride, Tina	McCabe, Carol	McCain, Patricia
McCall, Maurya	McCall, Ray	McCalley, Toni	Mccallum, Ross	McCanlies, Katherine	McCart, Dale
McCarthy, Bryan	McCarthy, Casey	McCarthy, Debbie	McCarthy, Deborah	McCarthy, Linda	McCarthy, Linda
McCarthy, Linda	McCarthy, Louise	McCarthy, Mary	Mccarthy, Mickey	McCarthy, Paul	McCarthy, Sean
McCarthy, Susan	McCartin, Laurie	McCartin, Mr. Michael	McCarty, Valerie	McCaughey, Linda	McCaul, Conor
McCauley, Gregg	McCauley, Maureen	McChesney, Evelyn	McChrystal, Karen	McClain, Molly	McClasky, Stephen
McCleary, Dr. Harriet	McCleary, Tiffany	McClelland, Scott	McClintock, Gloria	McClintock, Ms. B.a.	McCloskey, James
McCloud, Kalyn	McCluckie, Ryan	McClung, Leon	McClure, Andrea	McClure, Andrew	McCluskey, Ian
McColl, Margaret	McColley, Cheryl	McCollim, Jeff	McCollum, Kristi	McColman, Lisa	McComb, Sandy
McCombs, Jeffrey	McCombs, Mr. Richard H	McCombs, Robert	McConkey, James	McConkey, Kimberly	McConnell, Charles
McConnell, Ellen	McCormack, Elizabeth	McCormick, Alexandra	McCormick, Kate	mccormick, margo	McCormmach, Lesley M
McCorry, Eileen	McCown, Norma	McCoy, Amy	McCoy, Cherie	McCoy, Kim	McCoy, Louise
McCoy, Mr. Howard	McCoy, Virginia	McCracken, Tobin	McCradic, Anthony	McCradic, Anthony	McCrary-Holland, Montez
McCready, JaNahne	Mccready, Tami	McCreary, Jan	McCredie, Gail	McCrone, Eric	McCrytal, John
McCuen, Gary	McCuen, Gary	McCulloch, Arch	McCulloh, Michael	McCullough, Justin	McCullough, Maureen
McCullough, Mr. William E	McCumby, Charles	McCumby, Charles	McCurdy, T	McCutchen, Leighton	McCutcheon, Meghan
McDade, Shereen	Mcdaniel, Kevin	McDermit, Evan	McDermott, Denise	McDermott, Ms. Marianne	McDill, George
McDonagh, Janet	McDonald, Charles	McDonald, Colleen	McDonald, Colleen	McDonald, Emily	McDonald, Holly
McDonald, Joe	McDonald, John	McDonald, John	McDonald, Jr., Stanley	McDonald, Judy	McDonald, Kim
McDonald, Leslie	McDonald, Mary	McDonald, Mary	McDonald, Mary Ann	Mcdonald, Morgan	mcdonald, pamela
McDonald, Stuart	McDonald, Thomas	McDonald, Zach	McDonough, Shelley	McDonough, Shelley	McDougal, Austin
McDougall, Cassandra	Mcdow, Derek	mcdowell, keith	McEahern, Wendy	McElhiney, Becky	McElveen, William
McEntire, Modell	McEuen, Paul & Nancy	McEvoy, Aileen	McEwan, Virginia	mcfadden, william	Mcfalls, Sharon
McFarland, Mary Ann	McFarland, Randy	McFatridge, Richard	McFletcher, Liselle	McGahan, Kathy	McGarry, A.
mcgarry, carl	McGarry, Charles	Mcgarvie-Munn, Iain	McGaughey, Mary	McGavin, Linda	McGeary, Mary
McGee, C	McGee, Deric	McGee, JamesEric	McGee, Lynn	McGeehan, Carol	McGill, Ann C.
McGill, Ann C.	McGill, Ron	Mcgillivary, M	McGilvray, Barbara	McGlaughlin, Paige	McGlinch, Suzan
McGlynn, Edward	McGoldrick, William	McGough, Alice	McGovern, Laura	McGowan, Richard E	McGrath, Anne
Mcgrath, Barbara	McGrath, Joan	McGrath, Mark	mcgrath, maurice	Mcgrath, Michael	McGratty, Chris
McGregor, Donald	McGregor, Donald	Mcguane, Gale	McGuigan, Carolyn T.	McGuinn, Deborah	McGuire, Ellie
McGuire, Emily	McGuire, James	McGuire, Jason	McGuire, Jessica	McGuire, Maggie	McGuire, Mary
McHugh, Karen	McHugh, Robert	McIndoo, Hilary	McInerney, Anton	McIntire, Gordon	McIntosh, JoAnn

McIntosh, Virginia	McIntyre, Lynn	McIntyre, Mark	McIntyre, Robert	McJunkin, Diane	mckaig, alice
McKamey, Eugene	McKay, Barbara	McKean, Amelia	McKee, Lary	Mckee, Mckenna	McKee, Ms. Kaitlyn
McKee, Richard	McKee, Richard	McKee, Sarah	McKeeman, Jana	McKeen, Cynthia	McKeever, Tim
mckeiver, Mrs. willia	McKelvey, Gerald	McKelvey, James	McKendall, Sr., Steven K.	McKendry, Amy	McKenna, Alexis
McKenna, James	McKenna, Kendra	McKenna, Loree	Mckenna, Michael	McKenney, Michelle	McKenney, Todd
Mckenzie, April	McKenzie, Constance	McKenzie, Dan	Mckenzie, Mary	McKeon, John	McKeon, Mary
McKernan, Charlotte	Mckiernan, Elaine	McKillip, Linda	McKim, Jan	Mckinley, Sandra	McKinney, Andromeda
McKinney, Cheryl	McKinney, Danielle	McKinney, Judy	McKinney, Kathryn	McKinney, Maria	McKinney, Mary
McKinnie, Robert	Mckinstry, Alvin	McKitrick, Mary	McKittrick, Katherine	McKnight, Elizabeth	McKown, Tanya
McKye, Christina	McLain, Lesli	McLain, Stefany	McLane, Kathleen	McLaren, Nadia	McLauchlin, Julie
McLaughlin, Gary	McLaughlin, Kathleen	McLaughlin, Lea	McLaughlin, Margaret	McLaughlin, Nelda	McLaughlin, Timothy
Mclaughlin, William	mclellan, gina	Mclellan, Judith	McLeod, Arlee	McLeod, Carmen	McLeod, Daniel
McLeod, Michael	McLeod, Phoebe	McLeod, Steven	McMahon, Annie	McMahon, Betsy	McMahon, Carol
McMahon, Carol	McMahon, Julia	McManus, Anne	McManus, Jill	McMaster, Amy	Mcmenamin, Rosalie
McMilin, Edward	McMillan, Randolph	McMillion, Kim	McMULLEN, Colleen	McMullen, Evelyn	McMullen, Mr. Daniel
McMurry, Nan	McNall, Shirley	McNallen, Marianne	McNamara, Anita	McNamara, Janine	McNamee, S
McNaughton, Lesley	McNeely, Paul	McNeil, Kerry	McNeil, Marcia	McNeil, Marianne and Tim	McNeill, Douglas
McNeill, Norma	Mcnicol, Karen	McNitt, Doris	McNulty, Martha	McPherson, Andrew	McPherson, Charles
McPherson, Kay	McPherson, Susan	McQuilken, Sean	McQuitty, Amy	McQuown, Roger	McRae, Nancy
McRae, William	McShane, Larry	McShane, Mari	mcsweeney, doug	McTaggart, Patricia J.	McTague, Melissa
McVarish, Linda	McVey, Emilie	McVicker, Micah	McWhinney, Mark	McWhorter, Karen	McWilliams, Mr. Jon
Meachum, Marcy	Mead, Caroline	Mead, Sam	Meade, David	Meade, William	Meadows, Debbie
Meakin, Joanna	Meakin, Joanna	Meanley, Meg	Means, Lynda	Meares, Jennifer	Meares, Shawn
Medanic, Kathy Holland	Medbery, Nate	Medford, David	Mediano, Manor	Medina, Kathleen	Medina, Maureen
Medina, Ventura	Medley, Elizabeth	Medley, Rebecca	Medow, Jill	Medrano, Stephanie	Mee, Jim
Meegan, Brian	Meehan, Dan	Meehan, Mr. James	Meehan, Mr. James	Meehan, Pat	Meehan, Pat
Meehling, Susan	Meeker, Cheryl d	Meeks, Mary Lou	Meeuwsen, Andrea	Meffert, Hilde	Mefford, Bradley
Mefford-Hemauer, Apryl	Mehan, Nancy	Mehl, Hollis	Mehl, Hollis	Mehle, Anthony	Mehler, Maureen
Mehoudar, Helen	Mehrotra, Siddharth	Meier, Elsbeth	Meier, Gail	Meier, Tim	Meike, Gerald
Meincke, Arthur	Meisel, Myron	Meisner, Gary	Meissner, Steven	Meister, Russell	Mejia, Marianna
Melanson, Donna	Meldrum, James	melfe, Mr. dan	Melincoff, Michael	Melinz, Cheryl	Melis, Luc
Mell, Ms. Lisa	Mellica, Jason	Mello, Harry	Mello, Shannon	Mello, Sharlamay	Melm, Gerald
Melo, Elizabeth	Melody, Sybil	Melrood, Amanda	Melton, Alyssa	Melton, Conrad	Melton, Jacquelyn
Melton, Ms. Kathryn	Melton, Rita	meltzer, gwenn	Meltzer, Rachel	Melville, Colin	Melvin, Joseph
Memmo, Gaia	Menard, Jana	Menard, Ms. Rose Marie	Menasco, Jr., Lawrence	Mendelsohn, Alex	Mendes, Aimee
mendes, desiree	Mendes, Gerald	Mendez, Javier	Mendez, Molly	Mendez, Sasha	Mendez, Virginia
Mendieta, Vince	Mendieta, Vince	Mendousa, Anthony	Mendoza, Laura	Mendoza, Richard	Menemdez, Crystal
Menendez, M	Menezes, Daniela	Menne, Suzanne	Mennel-Bell, Mari	Mennig, Theresa	Menotti, Robyn
Menza, Alexander	Merchant, Mike	Mercier, Lyssa	Meredith, Lauren	Mericle-gray, Elissa	Merino, Aimee
Merino, Margaret	Meriwether, Melissa	Merle, Lynn	Merlino, Lawrence	Merljak, Ms. Julija	Merljak, Ms. Julija
Merrick, Neil	Merrifield, John	Merrill, David	Merrill, Dick	Merrill, Mason	Merryman, Arlene
Mershon, Don	mertens, greta	mertz, philip	Mesalles, Maria	Messatzzia, Linda	Messer, Janice

Messerschmitt, Susan	Messina, Carol	Messina, Jennifer	Messino, Janice	Mester, Mary	Metal, Ed D.
Metas, Nicole	Metcalf, Alison	Metcalf, Kevin	Metcalf, Mary	Metcalfe, Jane	Methvin, Barbara
Metnetsky, Linda	Metoyer, Marie Metoyer	Metoyer, Marie Metoyer	METSINGER, PAT	Metsopulos, George	Metters, Robert
Mettie, Bonna	Mettie, Bonna	Metz, Whitney	Metzger, Carol	Metzker, Nate	Metzler, JoAnne
Metzloff, Paul	Meuer, Rita	Meyer, Abigail	Meyer, Alexandra	Meyer, Anne	Meyer, Caitlin
Meyer, Carol	Meyer, Christina	Meyer, Christo	Meyer, Colonel	Meyer, Dianne	Meyer, Eric
Meyer, Gail	Meyer, Ian	Meyer, Ian	Meyer, Melanie	Meyer, Paulette	Meyer, Renee
Meyer, Tanya	Meyerhof, Greta	Meyerpeter, Kurt	Meyers, Bruce	Meyers, Donna L.	Meyers, Gary
Meyers, Sarah	Mican, Frances	Mican, Frances	Micciulla, Adriana	Michael, Brandon	Michael, Melinda
Michaelis, Karen	Michaels, D	Michaels, L	Michaels, Ms. Brenda	Michaels, Peter	Michaelson, Kathy
Michaelson, Lynn	Michalska, Gerri	Michaud, Dan	Michelle, Martine	Michelson, Carol	Micich, Louis
Micklin, Philip	Middleton, Pat	Middour, Jeff	Midgett, Jennifer	Midtbo, Barbara A	Midyette, Shirley
Miele, Danielle	Mientus, Marian Liza	Mier, Chris	Mier, Pedro	Mierow, Luanne	Miess, Art
Mieszala, Ronald	Migdal, Marcia	Migliaccio, Carol	Miglino, William	Mijares Jr, Alfonso	Mikach, Justin
Mikach, Justin	Mikkelsaar, Tiia	Mikkelson, Gregory	Mikos, Dorothy	miksys, matt	Mikus, Dr T
Mikuska, Helen	Milbourne, Gregory	Milbourne, Gregory	Miles, James	Miles, Jenna	Miles, Mark
Miles, Mitchell	Miles, Sara	Milewski, Nancy	Milholland, Mrs. Mary Cross & Mr. Dwight	Millar, Maria	Millar, Mr. Riff
Millard, Madyson	Miller Jr, Michael	Miller Jr, Stanley J.	Miller, Abby	Miller, Andy	Miller, Angela
Miller, Anne Ryan	Miller, Ariel	Miller, Barbara	Miller, Bobbi	Miller, Bonnie	Miller, Caroline
Miller, Cathy	Miller, Chris	Miller, Connie	Miller, Curtis	Miller, Deann	Miller, Deborah
Miller, Diane	Miller, Dianne	Miller, Eileen	Miller, Eleanor	Miller, Ellen	Miller, Eric
Miller, Frank	Miller, Harriet	Miller, Harry	Miller, Heather	Miller, Howard	Miller, Jaclyn
MILLER, JAMES	Miller, Jared	Miller, Jared	miller, jerome	Miller, Jerry	Miller, Jill
Miller, Joan	Miller, Joan	Miller, Joan	Miller, Jon	Miller, Joseph	Miller, Joshua
Miller, Julie A	Miller, Karen	Miller, Kathy	Miller, Keith	Miller, Kenneth	Miller, Kerby
Miller, Kristine	Miller, Lawence	Miller, Louise	Miller, Marcia	Miller, Maria	Miller, Maria
Miller, Mary	Miller, Mary	Miller, Melanie	Miller, Michael	Miller, Michael	Miller, Ms. Dorothy
Miller, Ms. Genevieve	Miller, Pamela	Miller, Pamela	Miller, Patti	Miller, Rachel	Miller, Ralph
Miller, Rhonda	Miller, Robert	Miller, Robert	Miller, Robert	Miller, Rochelle	Miller, Ruth
Miller, Sam	Miller, Sandra	Miller, Sharon	Miller, Sheila	miller, shirley	MILLER, STEVEN
Miller, Tim	Miller, Timothy	Miller, Todd	miller, tom	Miller, Travis	Miller, Victoria
Miller, Zackery	Miller-Kostove, Cynthia	Millett, D	Millick, Monte	Milliken, Elizabeth	Millimet, Lisa
Millonig, Ann	Millonig, Ann	Mills, Damon	Mills, k	Mills, Michael	Milner, Linda
Milonas, Nikolaos	Milonas, Nikolaos	Milton, Jack	Milton, John M	Minasian, Donald	Mindar, Richard
Minden, Shelley	Minerovic, Constance	Minert, Carolyn	Minesota, Liza	Minic, Marija	Minich, Christopher S.
minish, jennifer	Mink, Daniel	Minnick, Robert	Minter, Earl	Minter, Earl	Miotke, Victoria
Miracle, Rhonda	Miragliotta, Tony	Mischenko, Stephen	Misdom, Emily	Misek, Jolie	Misicka, Ed
Mislove, Caroline	Missimer Jr., Robert D.	Missimer, Marilyn	Misura, Lori	Misurelli, Jude	Mitchell III, F. Marion
Mitchell, Anne-Marie	Mitchell, Bonnie	Mitchell, Dawn	Mitchell, Dorothy	Mitchell, Dr. Brian	Mitchell, Jan
Mitchell, Jessica	Mitchell, John	Mitchell, Julia	Mitchell, Julia	Mitchell, Michael	Mitchell, Natalie
Mitchell, Pamela	Mitchell, Richard	Mitchell, Susan	Mitchell, William	mitchell, yolanda	Mitra, Mousumi
Mittelstaedt, Thomas	mittig, william	Mittin, Breena	Mittman, Asa	Mitu, Camelia	Miville, Sharon
Mizzi, Mary	Mlekarov, Noemia	Moan, Terry	Mobilio, Dawn	Mock, Carol	Mock, Neal
Mockus, Deimile	Modarelli, David	Moderhack, Ellen	Moebus, Patricia	Moedritzer, Mike	Moeller, Mary Joyce
Moeller, Meagen	Moenk, Jeanne	Moffatt, Aaron	Moffet, Barbara	Moga, M	Mohanty, lopamudra
Mohr, Geoffrey	Mohr, Jack	Mohrmann, Ann	Moir, Dollie	moir, madelaine	Moissant, Helen
Mojica, Diane	Molder, Michael	Molen, Mark	Molendijk-Schipper, Lenie	Molho, Arthur	Molina, Norma
molinero, cynthia	Moll, Dawn Marie	Mollen, Shawn	Moller, Richard	Molling, Corrine	Mollo, Mary

Molloy, Mark	molsen, elizabeth	Molter, Rose	Moluf, Jeff	Molyneaux, Kathie	Momsen, Bea
Monaghan, Dina	Monahan, Claudia	Monarch, Mariposa	Monarch, Richard	Mondello, Joseph	Mondragon, Michelle
Mone, Carolyn	Monegan, Theodora	Monette, Rachel Colon	Monie, Peter	Monie, Sherry	Monitto, Nicholas
Monjaras, Victor	Monks-Plackett, Alison	monnier, bruce	Monro, Alex	Monroe, Christy	Monroe, Donna
Monroe, James R	Monroe, Lynn	Monroe, Michael	Monroe, Patrick	Monroe, William	Monsalve, Irma
Monsen, Wayne	Monson, Carol	Monson, Todd	Montague, Patricia	Montaine, Marietta L.	Montalto, Victoria
Montalvo, Erik	Montalvo, Erik	Montano, Brandi	Montapert, Mr. Anthony	Montapert, Mr. Anthony	Montejo, Barbara
Montenegro, Edgar	Montes, Mike	Montgomery, Nancy	Montgomery, Robert	Montoro, Ernest	Moody, Debra
Moody, Jay	Moody, Peggy	Moody, Siobhn	Moody, Yvonne	Mooers, Mel	moon, bill
Moon, Mary	Moon, Rick	Moon, Stuart	Moon, Stuart	Mooney, Sean	Moorcones, Mary T
Moore, Caroline	Moore, David	Moore, David	Moore, Jacob	Moore, Janet	Moore, Joel
Moore, Kaylee	Moore, Kaylee	Moore, Lorraine	MOORE, LOUISE	Moore, Lydia	Moore, M
Moore, Malc	Moore, Michelle	Moore, Mr. Hugh	Moore, Mrs Jeannine	Moore, Rebecca	Moore, Robert
Moore, Robert	Moore, Sandra	Moore, Sarah	Moore, Sheila	Moore, Sherrie	Moore, Timothy
Moore, Toni	Moore, Veronica	Moore, Virgil	Moorehead, Melanie	Moorhead, Richard	Moorman, Linda
Mooshie, Marilyn	Mora, Lauren	Mora, Rey	Morais Jr, Philip	Moraiti, Vicky	Morales, Gabriel
Moran, J J	Moran, James	Moran, Jenn	Moran, Judy	Moran, Liana	Moran, Patricia
Moran, Robert	Morarre, Pam	Moraski, Kathy	Morby, V	Morby, V	Moreau, Lisa
Morehouse, Ralph	Moreira, J.	Moreira, Regina	Moreira, Rui	Moreland, Eric	Morell, Mary
Morellino, Michael	Moreno, Christine	Moreno, Sarah	Morero, Linda	Morey, Margaret	Morford, Richard
Morgan, Alexa	Morgan, Alexa	Morgan, Brenda	Morgan, Carol	Morgan, Claudia	Morgan, Courtney
Morgan, Cynthia	Morgan, Dan	Morgan, Dawn	Morgan, Elizabeth	Morgan, Geovaunie	Morgan, Jeannie
Morgan, Joan	Morgan, Joanna	Morgan, Joshua	Morgan, Lea	Morgan, Lilian Alecia	Morgan, Linda
Morgan, Melissa	Morgan, Myra	Morgan, Myra	Morgan, Nancy	Morgan, Nancy	Morgan, Rebecca
Morgan, Steven	Morgan-Hickey, Diana	Morgen, Henry	Morgenthaler, E	Morgenthaler, Jeffery	Morice, Lisa
Morin, Danielle	Morin, Kellie	Morita, Erin	Morley, Julaine	Morley, Robert	Morner, Gabriel
Morningstar, Samuel	moroff, madeline	Morpaw, Jesse	Morra, Frank	Morran, Jack	Morris, Catherine
Morris, David	Morris, Douglas	Morris, Edward	Morris, Eleanor	Morris, Ella	Morris, Florence
Morris, Gregory	Morris, Judee	Morris, Kevin	Morris, Leslie	Morris, Lucinda	Morris, Robert
Morris, Sharon	Morris, Sheila	Morris, Staci	Morris, Stephen	Morris, Steven	Morris, Susan
Morris, Vonya	Morrison, Barb	Morrison, Christina	Morrison, Donald	Morrison, Lynn	Morrison, N
Morrison, Sam	Morrison, Tonya	Morrison, Wesley	Morrone, Marina	Morrow, Randy	Morrow, William
Morse, Audra	Morse, Elizabeth	Morse, Robert	Morse, Thomas	Morski, Jennifer	Mortimer, Claire
Mortimer, Karl	Mortimer, Wayne	Morton, Alan	Morton, Amanda	Morton, Juliane	Morton, Karlene
Morton, Larry	Morton, Michele	Mory, Stephanie	Mosca-Clark, Vivianne	Moscarelli, Anna	Moschopoulos, Charity
Moscove, Jenine	Moseley, Kathy	Moser, Debra	Moser, Lynn	Moser, Paul	Moses, George
Mosgofian, Seth	Mosher, Judy	Mosher, Kathryn	Mosher, Melissa	Moshier, Lynn	Mosley, Cameron
Mosley, Patrick	moss, constance	Moss, John	Moss, Kathleen	Moss, Ms. Diane	Moss, Roy
Mothley, Drucilla	Mott, Kim	Mott, Macey	Motter, Marcina	Mottl, Michael	Motzer, Robin
Mouldin, Kaye	Moulthrop, Maria	Moulton, Rachel	Moulton, Thomas	Mound, Suzy	moungovan, mimi
Mount, Debby	Mounts, Suzy	Mourant, Wanda	Mousis, John	Moutray, Martha	Mouzourakis, Katherine
Movassagh, Mr. Kerry	Movsesyan, Greg	Moyer, Ellen	Moyer, Marcy	Moyer, Sandra	Moyer, Sandra
Moyer, Sandra	Moyer, Sandra	Moyer, Sandra	Moyer, Sandra	Moynihan, Ruth B	MRKVICKA, EDWARD G.
Mrkvicka, Edward G.	Muchhala, Kunal	Muckelberg, Anna	Mudd, Stephen	Mudrey, Susan	Mueller, Amy
Mueller, Cheryl	Mueller, Marilyn	Mueller, Paul Maiden	Mueser, Karen	Muetz, Percy	Mugglestone, Ms. Lindsay
Mugridge, Nancy	Muhs, Rocio	Muir, Dorothy	Muise, Charles	mujica, bernardo alayza	Mula, Joe

Mulcahy, Thomas	Mulcare, Mr James	Mulder, James	Mulder, Joni	Mulholland, Sarah	Mulholland, Sarah
Mull, Frederica	Mullane, Danny	Mullane, Marilyn	Mullane, Sharon	Mullen, Maryanne	Mullen, Rachel
Mullen, Timothy	Mullens, Kenneth	Muller, David	Muller, Katherine	Muller, MaryAnne	Muller, Susan
Mulligan, Cheryl	Mulligan, Robin	Mullin, Jon	Mulliner, Magnus	Mullins, James	Mullis, Lauren
Mullis, Rita	Mulroy, Shelia	Mulvey, Greg	Mummery, Alexandra	Munar, Dwayne	Munch, Brianna
Munch, M	Muncie, Bethany	Munda, Theodore	Munday, Mary Mark	Mundie, Doreen	Mundinger, Doris
Mundt, Clarence	Mundth, David	Mundy, Jaye Anna	Munger, Anthony	Munger, Ms. Doris	Munguia, Franklin
Munitz, Anne	Munoz, Cheryl	Munoz, Julie	Muñoz, Laura	Munoz, Melissa	Munro, Gordon
Munroe, M	Munson, Amanda	Munster, John	Munster, John	Munter, John	Munves, Sol
Murano, Patricia	Muratore, Joseph	Murchison, Mary	Murdoch, Sarah	Murdock, Katherine	Murdock, Lauren
Murphy, Alice	Murphy, Cassie A.	Murphy, Charlotte	Murphy, Cynthia	Murphy, Janelle	Murphy, Joe
Murphy, Joy	Murphy, Judy	Murphy, Karen	Murphy, Marcheta	Murphy, Michael	Murphy, Michelle
Murphy, Paul	Murphy, Raymond	Murphy, Tim	Murray, Barbara	Murray, Ben	Murray, Brian
Murray, Eileen	Murray, Ian	Murray, Mark	Murray, Ms. Theresa	Murray, Ozell	Murray, Shirley
Murtagh, Joan	Musgrove, Jeanne	Musialowski, Monique	Musick, Doug	Musser IV, William M.	Muszynski, Gloria
Mutchler, Mike	Myer, Tim	Myers, Blayney	Myers, Carol Lee	Myers, Christina	Myers, Dean
Myers, Derald	Myers, DJ	Myers, Herb	Myers, Jessica	Myers, Linda	Myers, Pat
Myers, Sonya	Myers-Taylor, Aviva	N, David	N, J v d	N, J v d	N, Kris
N, N	N, N	N., D.	Naar, Ann	Nabavighadi, Mahmoud	Nabney, Kate
Nacey, Tom	Nachazel, Jane	Nachmias, Dr. Vivianne	Nadboy, Walter	Nadel, Barbara S.	NADEL, ROBIN
Nadle, Jon	Nadler, Adam	Nadreau, Gerald	Nadreau, Patricia	Naeder, Arick W.	Nafziger, Marjorie
Nagao, Christina	Nagata, Adair	Nagel, Clinton	Nagel, Dennis	Nagel, L.	Nagel, Olivia
Nagy, Barbara	Nagy, Joanne	Nahill, Brad	Naidich, Sandra	Naiman, Karen	Naiman, Shoshanah
Nair, P K Gopinathan	Naismith, Laura	Naji, Eric	Najia, Rose	Nakadegawa, Judy	Nakamura, Lisa
Nakayama, Garry	Nakonecznyj, Dave	Nakonieczny, Tomasz	Namasondhi, Ashley	Nance, Nancy	Nance, Peggy
Nangle, Mary	Nap, Ms. Ann	Napier, Sabrina	Naples, Jean Marie	Napoli, Veronica	Nappèe, Matthieu
Nardell, Jason	Nardella, Nancy	Nardi, Lisa	Narizny, Susan	Naroditsky, Marcia Narod	Naser, Paul
Nash, Charles	NASH, HEYWARD	NASH, HEYWARD	NASH, HEYWARD	NASH, HEYWARD	Nash, Mr. Jonathan
Nash, Patricia	Nash, Sarah	Nason, Kirk	Nason, Stephan	Nassetta, Denise	Natale, Adriana
Natalini, Sarah	Natarajan, Pradeep	Natawa, Sybil	nathanson, barbara	Naugler, Deborah	Naujalis, Paula
Naval, Lauree	navarrete, paloma	Navarro, Claudia	Navarro, Eleanor	Navarro, George	Navarro, Roxanne
Navez, Ren	Navin, D.Lee	Navran, William	Navratil, Nicole	Naylor, Adrienne	Naylor, Mr. Paul
Nazario, Alexis	Neal, Judith	Neal, Mr Warwick	Neal, Robert	Neall III, George M.	Neat, Jenny
Neath, Jeanne	Nebe, Diane	Nechifor, Talida	Neckebroeck, Anne-Marie	Nedeau, E. James	Needham, Meredith
Needham, Meredith	Neel, Anne	Neff, Elizabeth	Negri, Angela	Nehring, Jeff	neidzwiecki, linda
Neihart, Janet	Neil, Robert	Neil, Sara Morrison	Neil, Wm.	Neill, Carol	Neill, Cassandra
Neilly, Jack	neiman, e	Neiman, Ofer	Nelle, Nora	Nelms, Zachary	Nelson, Beatrice
Nelson, Brad	Nelson, Brian	Nelson, Cecelia	Nelson, Chris	Nelson, David	Nelson, Dr. Diane
Nelson, Franklin	Nelson, John	Nelson, Judy	Nelson, L	Nelson, Lynn	Nelson, Moira
Nelson, Mr. Thomas	Nelson, Ms. Nanci	Nelson, Paul	Nelson, Richard	Nelson, Shirley	Nelson, Shirley
Nelson, Virginia	Nelson, Wendy	Nelson, Wendy	Nelson, William	Nemack, Anne	Nemeth, Cipra
Neogy, Ms. Sunetra	Nepomnyashchy, Victor	Neral, David	Nereson, David	Nerin, Bill	Nerin, Bill
Nery, Luana	Nesbitt, Dale	Nesbitt, Eileen	Nespoli, Edmund	ness, chris	Ness, Sonia
Nesslinger, Johnny	Neste, George	Nett, Laurel	Nettesheim, Catherine	Netti, Steve	Nettleton, John
Neu, Gary	Neuber, Christa	Neuendorf, Mary	Neuhauser, Robert	Neuhoefer, Otmar	Neumann, Angelika
Neumann, Mary	Neumann, Nancy	Neumark, June	Neuschel, Peter	Neuzil, Bob	Nevans, Ann

NEVIN, DAVID	Nevins, Cindy	Nevins, Richard	New, Bonnie	Newberg, Karen	Newberg, Mr. Stephen and Robin W
Newberry, Carla	Newbold, Gene	Newbry, Dakota	Newcomb, Rachael	Newcomer, Priscilla	Newell, Derrek
Newell, Ms. Brooke	Newfield, Dale	Newgent, Susan	Newick, Cyndee	Newill, Dr. Carol	Newkirk, Linda
Newlin, John	Newlin, Sue and Paul	Newman, Anita	Newman, B.	Newman, Connie	Newman, Eric
Newman, Hilary	Newman, Jacqueline	Newman, Kathy	Newman, Laura	Newman, Mr. Harry	Newman, Roberta E.
Newman, Samuel	Newman, Sarah	Newman, Zachary	Newmark, Robert	Newport, Michael	Newton, Anna
Newton, David	Newton, George	Newton, Tiffany	Nez, David	Nezin, Stuart	Ng, Linda
Ngom, Kamau	Nguyen, Binh	Nguyen, Bush	Nguyen, Cynthia	Nguyen, Nancy	NiÃ±o, Gustavo Adolfo Avellaneda
Nial, Christopher	Niatum, Duane	Niccolson, Candace	Nicholas, Anthea	Nicholas, Neil	Nichols, Barb
Nichols, Billy	Nichols, Carmen	Nichols, Cheryl	Nichols, Donald	Nichols, J	Nichols, John
Nichols, Paige	Nichols, Paul	Nichols, Robert	Nichols, Sandi	Nichols, Stephen	nicholson, eric
Nicholson, Mike	Nicholson, Sara	Nickum, Susan	Niclas, Joshua	Nicodemus, Sharon	Nicolai, Nicola
nicolas, barbara	Nicoletti, Vincent	Nicoli, Alberto	Niedworok, Claudio	Niedzielski, Robert	Niehaus, Marcus
Nielsen, Antonella	Nielsen, David	Nielsen, Gregory	Nielsen, Paul Lawrence	Nielsen, Rose M Gonzales	Nielsen, Sally Anne
Nielsen, Sally Anne	Nielsen, Steven	Nielsen-Mackley, Lena	Nielson, Greg	Nielson, Linda	Nielson, Mark
nieman, Kimberly	Niemiec, Richard	Nieminen, Janne	Nienaber, Rachel	Niermann, Michaela	Nies, Randy
Niesen, Andreas	Niessen, Peter	Niestedt, Rolf	Nieves, Leslie	Nieves, Nell	Nigrath, Nigeala
Nihipali, Michele	Niketopoulos, Rachel	Nikkel, John	Nikolova, Jivka	Nillissen, Sherry	Nilsen, K.
Nilsson, Derinda	Niski, Joseph	Nisley, Zella	Nisperos, Stacy	Nitz, Larry	Nitz, Ms. Jennifer
Niwa, Rosemarie	Nizam, Rafa	Noble, Aaron	Noble, Arthur	Noble, J	Noble, Ruth
Noble, Thomas	Nobles, Kelly	Nochur, Adi	Noe, Phillip	Noel, Darrell	Noel, Philip
Noetic, Nicola	Noga, Carolyn	nolan, cyndi	Nolan, Dan	Nolan, Dennis	Nolan, Katherine
Nolan, Kathy	Nolan, M	Nolan, Patti	Nolan, Stephen	Nolan, William	Noland, Robin
Nolden, Denise	Noll, Marguerite	Noloboff, Nancy	Nolta, Louise	Nolter, Robert	Noonan, Greg
Noonen, Janet	Norby, Allan	Norby, Janet	Norcross, Debbie	Nordeman, Valerie	Norden, Russell
Nordhof, Pamela	Nordin, Lillian	Nordmann, Robert	Nordstrom, Brian	Norkun, David	Norman, Camille
Norman, Larry	NORMAN, MERLE	Normandin, Anne	Norr, Carolyn	Norris, Jessica	North, Connie
North, Janette	North, Maureen	Northcraft, Laura	Northrup, Betty	Norton, Eva	Norton, Heather
Norton, John F	Norton, Megan	Norwood, Zack	Nos, Ruben Soriano	Nosbaum, Jeff	Nossal, Matt
Notaro, Ralph	Novack, Aaron	Novak, J	Novak, Kay	Novak, Mr. Dan	Novak, Trina
Novelo, Cristina	Novick, Christine	Novotny, Mark	Nowack, James	Nowak, Bill	Nowak, Diane
Nowak, Joseph	Nowak, Joseph	Nowak, Joseph and Trudy	Nowicki, Maria	Nowicki, Maria	Nowicki, Maria
Noyes, Margaret	Noyes, Michael	Nozawa, Lyle	Nuara, Michael	Nuccio, Edwina	Nuccio, Sue
Nuesch, Raymond	Nuesch, Raymond	Nugent, Angelika	Nugent, Carol	Nugent, Edward	Nugent, Kathryn
Nührich, Paulo	Nührich, Paulo	Nührich, Paulo	Nührich, Paulo	Nührich, Paulo	Nullman, Mark
Nulty Jr, Tom	nunez, amado	nunez, amado	nunez, feliz	nunez, feliz	Nunez, Leonardo
Nunez, Rudy	Nunoo, DeRoy	Nurse, Heidi	Nusbaum, William	Nussel, Arthur	Nussel, Arthur
Nussel, Arthur	Nutter, Mary	Nwman, J L	Nylen, Eric	Nypaver, Mike	Nystrom, Amy
Nystrom, Roger	Nystrom, Warren	O, A	O, D	O, Nancy	O., Jesse
oakden, Hilary	Oaklander, Christine I.	Oaks, Barry	Oaks, Michael	Obeid, Robert	Ober, Dennis
Oberst, Della	Oberti, August	Obolsky, Lenny	Oboruemuh, Abraham	Oboruemuh, Abraham	O'Boyle, Eileen
Obrien, Carol	OBrien, Chris	O'Brien, Dennis	O'Brien, Floyd	Obrien, Gina	OBrien, Kathy
OBrien, Kelly	O'Brien, Matthew	O'Brien, William	O'Callaghan, Judith	Ocasio, Margaret	ocean, chris
Och, Evelyn	Ochoa, Elizabeth	Ocon, Jill	O'Connell, Kathleen	O'connell, Thomas	O'Conner, Crista
OConnor, M	O'Connor, Margaret	O'Connor, Robert	OConnor, Shari	Oda, Mr. John	Odair, Renee
ODear, Elizabeth	Odell, Rollin	O'Donald, Julie	odonnell, anthony	O'Donnell, Deanne	O'Donnell, Richard
O'Dowd, John	O'Driscoll, Dagmar	O'Driscoll, Kari	Oerke Jr, Carl	Oettinger, Andrea	Ogden, Dereka

Ogden, Geoffrey	Ogella, Edith	Ogilvie, Dave	Ognjanovic, Michelle	Ognjanovic, Michelle	O'Grady, Darlene
O'Grady, David	Ogren, Linda	Ogren, Lorrie	O'Hagan, Gweny	O'Hagan, Nancy	O'Haire, Hugh
ohara, gail	O'Hara, Peter	O'Hara, William	O'HARE, WILLIAM	O'Hearn, Kathleen	Ohland, Andreas
ohlenforf, carol	Ohren, Daniel	O'Keefe, Catherine	O'Kelly, Tracey	Olander, Dr. Alan	Olander, Shirley
O'Laughlin, Kay	Olavarria, Victor	Oldaugh, Dennis	Olden, Karen	Oldfield, Jane	Oldham, Kathleen
Oldham, Kevin	Oldman, Margaret	Oleynikov, Karina	Oliva, Lucile	Oliveira, Daniela	Oliver, Betty
Oliver, Bruce	Oliver, frances	Oliver, June	Oliver, Russel	Olivett, Jean	Olivier, Larry
Olk, LaMar	Olmeda, Jay	Olmsted, Thomas	Olney, Dawn	Olsen, Dennis	Olsen, Donna
Olsen, Jacqueline	Olsen, James	Olsen, Seth	Olsen, Spencer	Olsen, Tess	Olson, Beth
Olson, David	Olson, Diane	Olson, Geri	Olson, Jeffery	Olson, Judith	Olson, Liana
Olson, Marilyn	Olson, Mary	Olson, R. Julie	Olson, Renie	Olson, Shannon	Olson, Victoria
Olveda, Marlene	Omar, Rosli	O'Meara, Colleen & Joe	Onaclea, Susan	Ondyak, Elizabeth	O'Neal, Maureen
Oneill, Den	O'Neill, Ryan	Oneill, Tim	Onel, Clara	Onofrietti, Philip	Onysko, James
Oolie, Darlene	OP, Gloria Korhonen	Opalka, Sherry	Opaskar, Patricia	Oppenhuizen, Kathy	Oppfelt, Tina
Oqvist, Linda	Oravec, Randy	Ordin, Laurie	Ordonez, Richard	Ordons, Barbara	Ordway, John
O'Reilly, Jason	O'Reilly, Patricia	Oresky, Alan	Orionis, Leo	Orleans, Sam	Orlich, Mary Anne
Orlowski, Stan	Orman, Mitchell	Ormiston, Firmilian	Orndorff, Monica	Ornee, Mary	ORNELAS, RAOUL
Orner, Karen	Orona, Angel	Orona, Erica	O'Rourke, Elene	O'Rourke, Rory	Orozco, Angela
Orr, Judith	Orr, Linda	Orr, M. Lou	Orr, Michael	Orr, Noel	Orrange, Mary K
Orta, Gregory	Ortega, Franco	Ortega, Victor	Ortiz, Frank	Ortiz, Henry	Ortiz, Robert
Osada, Barbara	Osada, Susan	Osborn, Mr. Peter	osborne, amanda	Osborne, Chris	Osborne, Dr. Patrick
Osborne, Dr. Patrick	Osborne, Elizabeth	Osborne, FriendMaura E	Osborne, Heather	Osborne, Michelle	Osborne, Stacey
Osburn, Linda	Oser, Ms. Wendy	O'Shea, Andrea	O'Shea, Dennis	Oshea, Jan	Osowski, Maryjo
Osowski, Maryjo	OSteen, Karen	Oster, Bruce	Ostheimer, Karissa	Ostler, Adam	Ostlie, Susan
Ostoich, Ms. Julie	Ostrander, Bob	Ostrander, Jr., William P.	Ostrow, Hillary	O'Sullivan, Brett	o'sullivan, john
O'Sullivan, Katherine	Oswald, Jackie	Oswald, Sarah	Osyczka, Jory	Othmer, Julia	OTR, Kae Blecha,
Ott, Timothy	Ottele, Travis	Otti, K	Otto, Len	Otto, Lori	Oudeans, Sierra
Ouedec, Christophe	Ouellette, Tracy	Oulman, Lynne	Ousley, Carrie	Out, Sheila	Outten, Eric
Overton, Mr. Steve	Overton, Sean	Owen, Bernadine	Owen, Matthew	Owen, Shawn	Owen, Sophie
Owens, Jane	owens, kerry	Owens, S	Owens, Sheila	Owens, Theresa	Owens, Tyler
Owens, Vikki	Oxyer, Jim	Ozer, Karen	Ozer, Richard	ozeran, h	Ozeroff, Elaina
Ozga, Scott	Ozias, Julie	p, Alan	P, Andy	p, k	P, N
P, P	P, Paula	P, Roger	P, Sofia	P., Octavia	pa, jo
Pabarcius, Michelle	Pable, Martin	Pabst, Virginia	Pace, Ray	Pace, Scott	PACE, USAF Retired, Wm. ERROL
Pacey, Ann	Pachter, Linda	Pacifico, Eva	Packard, Dee	Packard, William	Packer, Patti
Packman, Zola	Padborg, Knud	Paddock, Nancy	Paden, Laura	Padgett, Forrest	Padier, James
Padilla, Kimberly	Padilla, Melania	Padilla, Sergio	Paetsch, Chandra	Page, Andrea Musick	Page, Cindy
Page, Lyn Z	Page, Michele	Page, Nicholas	Page, Peggy	Pagel, Andrew	paglia, Mr. Victor
Pagotto, Paolo	Pahlisch, Jonna	Paidas, Alice	Paige MSG USA Ret Ronald	Paige, Gina	Paige, Melissa
Paine, Paula	Pais, Paula	Pais, S	Pais, S	Paiva, Daniel	Paiva, Dorothea
Paix, Andii	Palacios, Amy	Palacky, Tami	Palazzini, Louis	Palecek, Bridget	paleias, linda
Palen, Norma	Palestina, Briana	Paley, Tom	Palla, Paul	Pallanes, Beatriz	Pallares, A.
Pallis, Rand	Palm, Linda	Palm, Lowell	Palmas, Michelle	Palmedo, Sage	Palmer, Annie
Palmer, Catherine	Palmer, Coburn	Palmer, Damian	palmer, gayle	Palmer, Heidi	Palmer, Helen
Palmer, Jennifer	Palmer, Kevin	Palmer, Maria	Palmer, Mary Caroline	Palmer, Mary Jane	Palmer, Matthew
Palmer, Pip	Palmer, R. Brent	Palmer, Ralph	Palmgren, Charlie	Palmquist, Wendy	Paluch, Peter
Pamenter, Jane	Pan, Pinkyjain	Panagiotopoulou, Katerina	Panfilio, Carol	Paniagua, Rosiris	Panila, Chris
Panko, John	Pannaman, Stanley	Pannell, Bonnie	Panny, Christopher	Pantale, JoAnne	Pantel, Jesus
Panter, Rich	Pantier, Gina	Pantoja, Maritza	Panunzio, Thom	Panunzio, Thom	Panunzio, Thom
Panunzio, Thom	Panunzio, Thom	Panus, Elizabeth	Paola, Betty	Paolini, Barbara	papandrea, Mr. john

Papanikolaou, Liliana	Pape, David	Pappano, Allie	Pappano, Rachael	Pappas, Carole	Pappas, Glen
Pappas, Kristina	Pappas, Robin	Pappert, Linda	Parada, Brenda	Paradis, Kate	Paraskevopoulos, Yannis
Pardi, Marco	parekh, jai	Parent, Melissa	Parente, Vania	Paris, James	Parisi, Nancy
Parisi, Nancy	Pariza, Janet	Park, Brendan	Park, Gregory	Park, Hyesun	Park, Laura
Park, Lila	Parker, C	Parker, C	Parker, Christina	Parker, Cynthia	Parker, Dixie
Parker, Doug and Jan	Parker, Elaine	Parker, Erika	Parker, Frank	Parker, Ginny	Parker, Graeme
Parker, James	Parker, Joan	Parker, Karen	Parker, Keith	Parker, Krista	Parker, Ky
Parker, Ky	Parker, Leon	Parker, Lori Renn	Parker, Michael	Parker, Ms. Deborah	Parker, Penny
Parker, Robert	Parker, William L.	Parkhurst, Liz	Parkin, Pat	Parkinen, Mitch	Parkinson, William
Parks, Jim	Parks, Warren	Parlette, Karen	Parlevliet, Leotien	Parmeter, Kyrsten	Parr, Mark
Parr, Sarah	parr, stacy	Parr, William	Parra, Alice	Parra, Dolores	Parra, Hector
PARRETT, Mr. DAVID	Parris, Nancy	Parrish, Caryl	Parrish, Eugenie	Parrish, Joan	Parrish, L.
Parrish, Scott	Parry, David	Parsley, Mary	Parsley, Max	Parsons, Larry	Parsons, Pamela
Parsons, R	Parsons, Rob	Parsons, Ron	Partin, Michael A. and Ruth A.	Partin, Nancy	Parton, Lila M.
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Pasqua, John	Pasqual, Elisabet Vaquer	Passty, Dr. Jeanette	Pastorino, Gino	Pastula, Adam	Patapis, Isidor
Patch, Rashid	Patel, Jason	Patel, Racash	Patel, Sagar	Patel, Sarosh	Pateman, Lynne
Paterson, Jenny	Patey, Gretchen	Patounas, Ann	Patrascoiu, Miss Adnana Mihaela	Patrick, Dwyne	Patten, Leslie
Patten, Robin	Patterson, Frank	Patterson, Julie	Patterson, Miles	Patterson, Pat	Patterson, Skye
Patteson, Patricia	Pattison, Mary	Patton, Audrey	Patton, Deborah	PATTON, LISA	Patton, Trina
Patty, shannon	Patyk, Stacy	Paul, David	Paul, K L	Paul, Logan	Paul, Revel
Paul, Virginia	Paullin, Mark	Paulson, Elizabeth	Paulson, Mervin	Paulson, Robert	Paustian, Astrid
Pauwels, Anita	Pauwels, P	Pavcovich, Michelle	Pavletic, Terry	Pavlovic, Marko	Pavon, Sergio
Pawloski, Robert	Paxton, G.	Payne, Grace	Payne, Rex	Payne, Rick	Payne, Rick
Payne, S. Janet	Payne, William	Peabody, Melissa	Peake, Gerald	Peakes, Julianne	Peale, Mike
Pearce Sr, John B	Pearce, Margaret	pearcy, carol	Peardon, Drew	Pearlman, Brenda	Pearsall, Judith
Pearson, Alisa	Pearson, C	Pearson, John S	Pearson, Lynn	Pearson, Rae	Pearson, Roy
pearson, Tia	Pearthree, Pippa	Pease, Julie	Peatman, Matt	Pech, Jim	Peck, Elizabeth
Peck, Pamela	Pedersen, Annette	Pedersen, Ashley	Pedersen, Sven	Pederson, John	Pedini, Michael
Pedrotti, Theresa	Peeler, Carlos	Peirce, Mr. Susan	Peirce, Mr. Susan	Peischl, Janice	Peixoto, Maria Lucia
Pekisheva, Luba	Pelausa, Enrico	Pelczynska, Barbara	Pelfini, Allison	Pelham, Greg	Pell, William
Pelleg, Dr. Josh	pelt, Scott Van	Pelton, Drew	Peltzer, Alan	Pemberton, Amy	Pena, Y.
Penchoen, Greg	Pender, Jacqueline	Pendrous, Stella	Penfield, Jameliah	Penhart, Maree	peniche, lori
Penick, Carolyn	Penn, K	Penn, Kathy	Penneau, Julie	Penner, Richard	Pennington, Michael
Penniston, Gregory	Penrod, Celia	Penrose, Christine	Pepitone, Miss Michelle	Peppard, John	Perales, Teresa Masia
Peralta, Joan	Peraza, Jessica	Percival, Lisa	Percy, Amanda	Perdios, Dan	Perea, Barbara
Pereyra, Carolyn	Perez, Carina	Perez, Charles	Perez, Jennifer	Perez, Margarita	Perez, Marie
Perez, Susan	Perez-Watkins, Monica	Periard, Tamy Godin	Peric, Ivana	Perigo, Jamie	Perilli, Richard A
Perilstein, Cindy	Perinchief, Jana	Perini, Louise	Perkins, Ana	perkins, e	Perkins, Madeline
Perkins, Marie T.	Perkins, Mike	Perkins, Mike	Perkins, Nicholas	Perkins, Sandra	Perkins, Sandra
Perla, Angeline	Perlaki, Jen	Perling, Richard	perlman, Paula	Perras, Kriss	Perrault, T.S.
Perrecone, Jody	Perren, William	Perrier, Gwyneth	Perron, P.	Perry, Bruce	Perry, Daniel
Perry, Doreen	Perry, Ellis	Perry, Jodie	Perry, Joy	Perry, Karen	PERRY, KIM
Perry, Robert	Perry, Robin	Perry, Sarah	Perry, Sue	Perry, Theresa	Perryman, Toddy
Persico, Yuka	persky, Mr. jerry	Persky, William	Person, Jackie Edgar	Person, Martha	Persons, Kate
Perstein, Angela	Pesko, Patricia	peter, dean	Peter, Joan	Peter, Judith	Petereit, Tina
Petermann, Janet	Peters, Cory	Peters, Jr., Mr. H.k.	Peters, Matt	Peters, Sarah	Peters, Thom

Peters-Eckel, Carolyn	Petersen, Alice	Petersen, Dorothy	Petersen, Elsa	PETERSEN, GARRINE	Petersen, M.D., Dr. Robert
Petersman, Mary Jo	Peterson, Barbara	Peterson, Calvert	Peterson, Connie	Peterson, Dale	Peterson, David
Peterson, Dorothy	Peterson, Eugene	Peterson, Jan	Peterson, John	Peterson, Karen	Peterson, Ken
Peterson, Kim	Peterson, Kimberly	Peterson, Kyle	Peterson, L.	Peterson, Mary	Peterson, Maureen
Peterson, Mrs. Linda	Peterson, Patricia	Peterson, Peter	Peterson, Richard	Peterson, Samantha	Peterson, Sandra
Peterson, Terry	Peterson, Theresa	Peterson, Tracey	Peterson, Tyson	Peterson, William	Petit, Laëtitia
Petkewec, Megan	Petkiewicz, Jim	Petkiewicz, Margaret T.M.	Petkovic, Eleonora	Petkovic, Michael	Petlock, Kyle
Petrak, Thanice	Petrakis, George	Petranto, Nancy	Petricek, John	Petrich, Mary Ellen	Petrie, Karen
Petrie, Lisa	Petrie, Shari	Petro, Pat	Petroni, John	Petronio, Tony	Petruccelli, Paul
Petry, Gabor	Petrzilka, Jan	Pettey, Corinne	Pettit, Kimberly	Petty, Dawn	Petty, Linda
Petzko, Barbara	Petzold, Ruth	Pfand, Horst	Pfeifer, Mr. Ivan	Pfeiffer, Matt	Pfeninger, Brianna
Pfersich, John	Pfleger, Lawrence	Pfleging, Daniel	Pflug, Carl	Pfluger, Lois	Ph.D., Deborah Filipelli,
Ph.D., Gunilla Karlsson,	Ph.D., Richard Thomas,	Ph.D., Robert Stach,	Pham, John	PhD, JD, James Riddle,	Phelan, Laura
Phelps, Kris	Phelps, Sally Ann	Phelps, William	Philip, Lianna	Philips, Nancy	Phillips, Andrea
Phillips, Anne	Phillips, Charles	Phillips, Christopher	Phillips, Christopher	phillips, ellen	Phillips, Heather
Phillips, Jan	Phillips, Jim	Phillips, Joseph	Phillips, Julian	Phillips, Linda	Phillips, Marilyn
Phillips, Mr. George	Phillips, Mr. Glenn	Phillips, Paul & Cynthia	Phillips, Perry	Phillips, Regina	Phillips, Robyn
Phillips, Steven	Phillips, Suzanne	phillips, thomas	Phillips, Traci	philpin, s	Phipps, Catherine
PHIPPS, MARIA	Piacentini, Lauren	Piasecka, Ewa	Piazza, Randall	Picard, June	Picardy, Katie
Piccagli, Kathie	Piccagli, Kathie	picciani, laureen	Picerno, Steven	Picher, H G	Pick, Thomas
Pickell, Bobbie	Pickens, Mike	Picker, Seth	Pickett, David	Pickett-Harner, Molly	Picone, Richard
Picton, Rebecca	Piech, James	Piechutzki, Laura	Piecora, Lisa	Pierce, Allison	Pierce, Deborah
Pierce, Ginger	Pierce, K	Pierce, Lynn	Pierce, Tanya	Pierce, Wayne	Pierini, Katherine
Pierpont, Michael	Pierson, Carolyn Clark	Pierson, Marilyn	Pierson, Neilia	Pierson, Robert	Pierson, Stewart
Pierucki, Jenny	Pieters, Tom	Pietka, Antoinette	Pietka, Antoinette	Pietrowski-Ciullo, Evelyn	Pietrzak, Darlene
Pike, Evette	Pike, Harold	Piker, Tanya	Pikus, Barbara	pilgram, maryanne	Pillow, Jami
pilon, m	Pilz, Joan	Pimentel, Llewellyn	Pincetich, Christopher	Pincince, John	Pine, Joslyn
Pine, Rosel	Pine, Steve	Pineda, Annalee	Pinezich, John	Pingel, Alva	Pinkerton, Anne
Pinkham, Bill	Pinkham, Bill	Pinkham, Michael	Pinneau, Janet	Pinneo, Dorothy	Pinque, Meryl
Pinsof, Robin	Pinto, Juliann	Pinto, Juliann	Pinto, Juliann	Pinto, Suzanne	Pinzon, Javier
Piotter, John	Pipella, Jeanine	Piper, Janna	Piper, Pierre	Pipkin, Mary	Pipp, Daniel
Pippen, Patti	Pippin-Emanuel, Patricia	Pirazzi, Tina	Pirkkanen, Perry	Pirson, Barbara	Pirtle, Woody
Pisano, Lina	Pistolesi, Linda	Pistorius, Shelley	Pitman, Tom	Pitman, Tom	Pitman, Tom
Pittman, Jawara	Pittman, Jennifer	Pittman-Shaw, Jaynell	Pitts, Katie	Pitts, Marian	Plaister, Deane
Plambeck, Judy	Plancich, Richard	Planes, Gene	Platt, Heather	Platt, Robert	Platt, Sylvia
Platzner, Rebecca	Plewa, Coreen	Plewinski, Sister Veronice	Pliner, Elliot	Plisko, Vladimir	Plisko, Vladimir
plocher, tara	Ploeger, E.m	Ploger, James	Ploscaru, Marina	Plourde, Ann	Plourde, R
Plubell, Susan	Plubell, Susan	Plumb, Michele	Plummer, Pam	Plunkett, Jennifer	Plunkett, Robert
Pober, Mr. Michal	Pochat, Louisette	Poche, Brieaux	Podell, Daniel	Podewell, Roger	Podgorski, Joel
Podo, Vincenza	Poe, Ben	Poe, Tom	Poehler, Gaius	Poehlman, Linda	Pogel, G
Poindexter, Kristin	Poinelli, Carolyn	Point, Ms. Peggy La	Polacek, John	Polens, Jared	Polesky, Ms. Alice
Policky, Cathy	Polis, Rose	Polito, Donnalynn	Polito, Gene	Politzer, Andrew	Polk, Nora
Pollak, Jeannie	Pollard, Heidi	Pollei, Lisa	Polley, JoAnn	Pollina, Ron	Pollina, Ron
Pollock, Thomas G	Poloski, Nicole	Polya, Lance	Pomeroy, Gilbert	POmeroy, Mr. Jim	Pomeroy, Susan
Poncia, Beverly	Ponder, Fred	Poobus, Mr. Allan	Poock, Patty	Pool, Trish	Poole, Andrea
Poole, Diane	Poole, Dorothy	Pooler, Carole	Poolos, Hazel	Poon, Leslie	Poopypants, Professor
Poore, John	Pope, C. Warren	Pope, D.B.	Pope, Donna	Pope, Glenn	Pope, Jolene

Pope, Michael	Pope, Robert	Popiel, Katie	popoff, dave	Poppler, Marilinn	Porcello, James
Porcher, Janeene	Porisch, Ruth	Porosoff, Lauren	porras, marco	Porrello, C	Port, M
Porter, Barbara	Porter, Barbara	Porter, Dr. Duncan	Porter, Erica	Porter, Janeen	Porter, Joel
Porter, Laura	Porter, Mark	Porter, MD, Jon	Porter, Nm	Porter, Pamela	Porter, Pamela
Porter, Sheryl	Porter, Susan	Porter-Steele, Nancy	Portney, Thomas	Posch, Robert	poscharscky, debra
Poschl, Korbinian	Posey, Donald	Poss, John	Poss, Roy	Postgate, George	Postma, Wendi
Poston, David	Postupalsky, Sergej	Potocnik, David	Potter, Aimee	Potter, Kate	Potter, Syd
Potts, Janet	Potts, Ruth	Poulos, Michael	Poulos, Peter	Poulsen, Barbara	Poulsen, Jennifer
Poulson, Terry	Poupko, Victoria	Pouttu, Deanna	Powell, Barb	Powell, Christine	Powell, Colleen
Powell, Colleen	Powell, Cornelia	Powell, Dale	Powell, Joyce	Powell, Kathleen	Powell, Lance
Powell, Michael	Powell, Ronald	Powell, Sara	Powell, Thomas	Powell, Tracy W	Powell, William
Power, LaVerne	power, philip	Powers, Anna	Powers, Barbara	Powers, Bryce	Powers, Buford
Powers, James	powers, lem	Powers, N.	Powers, Sheila	Powis, Michael	Powley, Carol
Powter, Dorothy	Poyant, Andrew	Poyezdala, Todd	Pozywio, Walter	Prael, Felix	prakash, karan
Praprotnik, John	Prata, Carol	Prather, Kay	Prather, Sabine	Prats, Alejandro	Prats, Megan
Pratt, Ted	Pratt, Yvonne	Prebeg, Joe	Prefontaine, Eileen	Preiss, Jack	Prellwitz, Carl
Prellwitz, John	Prescott, John	Presley, Steven	Presser, Diana	Presser, Diana	Presser, Diana
Presser, Diana	Presser, Diana	Presson, Andrea	Prestage, Susan	Preston, Kevin	Preston, Lynne
Prestridge, Laura	Pretet, Denise	price, allen	Price, Boris	Price, Dale	Price, Homer Edward
Price, Karla	Price, Kelsey	Price, Lily	Price, Mary	Price, Mary	Price, Ms. Lauren
Price, Natalie	Price, Ron	Price, Steve	Price, Zandra	Prichard, Rosemary	Prieur, Janet
Prieur, Janet	Primrose, John	Prince, Michael	Prince, Steven J.	Pringle, Bruce	Pringle, Catherine
Prior, Gary	Prior, Mark	Priskich, Ms. Fiona	Pritchad, William	Pritchard, Alvera	Pritchard, Mary
Pritchard, Patricia	Pritchard, Stephen	Pritchett, M.	Pritchett, William	Privette, Ralph	Probert, Lesley
Prochowski, Richard	Proctor, LaVina	Proietti, Carol	Prokop, Louise	Proper, Kenneth	Prosperie, Johnnie
Prostko, Linda D	Protano, Marco	Proto, Mike	Provost, Clifford	Prow, Mr. Steven	Prowell, Sarah
Pruitt, Geoffrey	Prum, Joan	Prum, Katherine	Pruss, Eric	Prussing, Elliot	Prussman, Donna
Pruzek, Kirsten	Prybe, Conrad	Prychodko, Nicholas	Pryde, Sharon	Pryputniewicz, Steve	Puaoi, Richard
Publi, Jean	Puca, Robert	pucci, josh	Puentes, Felena	Puerta, Jeanne	Puett, Barbara
Puett, David	Puetz, Mr. Daniel	Puffenberger, Mary	Pulsinelli, Michael	pulver, red	Pulver, Sally
Punneo, Sheryll	Puranen, Mikiala	Purbrick-Illek, Sally	Purcell, Jennifer	Purcell, Jennifer	Purcell, Karen
Purdy, Gwen	Puri, Seema	Purpuri, Philip	Purucker, Susanna	Putnam, Alethea	Putnam, Carol
Putnam, Cheryl	Putnam, Trista	Putrelo, Michael	Putrich, Steve	Pyles, Mr. Shane	Pyles, Mr. Shane
pyott, joanne	Pysher, Paul	pyun, lydia	Qhygoem, Z	Quach, Namphuong	Quaglia, Viviane
Quail, Karen	Quaintance, Charles	Quaintance, Joel	Qualls, Holly	Quarles, Neil	Quarrick, Robert
Quartin, Tamara	Quate, Amy	Quayquechuck, CB	Queen, Susan	Quezada, George	Quick, Holly
Quick, Justin	Quigg, Catherine	Quijano, Nikkelley	Quillen, York	Quimby, Patricia	Quinet, Linda
Quink-Lavallee, Sandra	Quink-Lavallee, Sandra	Quink-Lavallee, Sandra	Quinn, D.Michael	Quinn, David	Quinn, Erin
Quinn, John	Quinn, Joseph	Quinn, Marcy	Quinn, Tom	Quinn, Tracey	Quinones, Susan
Quintanilla, Luis	Quirk Jr, Martin J	Quirk Jr, Martin J	Quirk, Mr. Joseph	Quistorff, Monique	Quon, Marjorie
Qureshi, Abrar	R, A.	R, Anne	r, c	R, Dina	R, Jane
R, Jenn	R, K	R, Matt	R, Melanie	R, Peter	R, syl
R, Tom	R., Andrew	R., Nickole	R., S.	Ra, Mohammed	Raab, Ken
Raab, Leila	Raab, Leila	Rabaut, Charles	Rabon, Angela	Raby, Ms. Joyce 0	Raccio, Karen
Racine, Robert	Racker Jr, Brent	Rackowski, Patricia	Radbill, Colleen	Radcliff, Carolin	Radcliffe, Steve
Radek, Kent	Radford, Lemoine	Radicchi, Nilo	Radinovsky, Kathryn	Radka, Theresa	Radke, Ms. Irene
Radko, Ms. Danuta	Radosti, Susan	Radwany, Julia	Rae, Bevelry	Rae, Erika	Rae, Maya
Raedig, C.	Rafferty, Janet	Rafoth, Richard	Raftery, Rita	Ragan, Kathleen	Raganato, Alessandro
Raganato, Alessandro	Ragland, Joan	Rago, Marie	Rahbari, Carol	Raible, Annette	Raikes, Antonia
Railey, Bob	Rain, Saphira	Raines, Robert	Rainey, Carol	Rainville, Brianna	Raith, Frank

Raitt, Jacob R.	Rajagopalan, Raman	Rajan, Sara	Raleigh, Darren	Raleigh, Elizabeth	Ralls, Granny
Ralls, Wilma E	Ralph, Karin	Ralston, Aron	Ralston, Jane	Ralston, Jason	Ralston, Jeannette
Ralston, Joseph	Ramaci, Lisa	Ramaker, Julianne	Ramamurthy, Susan	Rambeau, Merrilee	Ramer, Kelly G.
Ramero, Lorenzo	Ramirez, Barbara	Ramirez, Carmen	Ramirez, Emmanuel	Ramirez, Javier	Ramirez, Jessica
Ramirez, Judith	Ramirez, Silvia	Ramon, Mrs. Laura	Ramos, Joann	Ramos, Miguel	Ramos, Paul
Rampi, Philip	Ramsey, Adam	Ramsey, Elizabeth	Ramsey, Ryan	Ramstrom, Eric G.	Ramus, Robert
Rand, Mary	Rand, Sherry	Randall, David	Randall, Dorene	Randall, Kay	Randell, Monica
Randle, John	Randleman, Craig	Raney, Jonathan	Rangel, Giovana	Ranii, MK	Rankin, Diana
Rankin, Jim	Ranshaw, Russell	Ranta, John	Ranvig, Eric	Rao, Harish	Rao, Kanchana
Rapalyea, Rev. Angela	Rape, Glenn	Raphael, H David	Raphael, Magi	Rapoport, Irwin	Rapoport, Remedios
Rapp, David	Rappaport, Alexandra	Rash, Susanne	Rasich, Sandy	Raskie, Sara	Rasmussen, Brandi
Rasmussen, Doris	rasmussen, margaret	Rasmusson, Jonathan	Ratcliff, Charline	Ratcliff, Philip	Ratcliffe, Thomas
Rathbone, Marjorie	Rathwell, C	Ratliff, Joe	Ratner, Ronald	Rattner, Ron	Raubenolt, Betty
Raughley, Brad	Rauworth, Steve	Raven, Kerrye	Raven, Suellen	Ravenstein, Kate	Raver, Kaitlin
Ravishankar, mekala	Rawa, Megan	Rawdin, Morris, Revelyn & Patrick	Rawlins, Wes	Rawls, Davian	Rawson, George
Ray, G Douglas	Ray, Gigi	Ray, Michael	Rayburn, Tammie	Rayfield, Edy	Raymer, John
Raymond, Keoki	raymond, mary	Raymond, Sherrie	Raymond, Timothy	Razo, Joe	Rea, Linda
Read, Beverley	Read, Seth	Reade, Deborah	Reader, Charlene	Reader, Stephanie	Reading, Judy
Reading, Mrs. T	Ream, Cathy	Ream, Donna	Reams, Laine	Rearden, Chance	Reardon, Matthew
Reba, Lynne	Reback, Mr. Mark	Rebagliati, Jorge	Rebello, Stephen	Rebordão, Luisa	Rechsteiner, Mark
Rector, Marsha	Rector, Robert	Redding, Carolyn	Reddy, Paul	Redford, Ms. Rebecca	Reding, Andrew
Redish, Ms. Maryellen	Redman, K.	Redman, Steven	Redmond, Jeanette	Redwing, Liz	Reece, David
Reece, Ray	Reed, Cindy	Reed, Dirk	Reed, Dr. Mary	Reed, Dustina	Reed, Ehben
Reed, Grace	Reed, Ikeena	Reed, James	Reed, Jennifer	Reed, Jennifer	Reed, Liz
Reed, R	Reed, Rebecca	Reed, Roberta	Reed, Robin	Reed, Ron	Reed, Stephanie
Reed, Susan	Reeder, Terry	REEL, JOSEPH	Rees, L. P.	Reese, Pat	Reese, Sarah
Reese, Sherwood	Reeves, Ella	Reeves, Kenneth	Reeves, Lenore	Reeves, Shirley	Regalado, Mark
Regan, Barbara A.	Regan, Laura	Rego, James	Rego, Sonia	Regusis, Anthony J.	Rehberg, Bill
Rehkugler, Alta	Rehne, Veronica	Reichbach, Edward	Reichel, Tom	Reichert, Miss Robyn	Reichert, Susan
Reichow, Debbie	Reid, Jena	Reid, Jena	Reid, Jim	Reid, Karen	Reid, Nancy
Reid, Nina Black	Reif, Misti	Reiff, Marian	Reigelman, Jessica	Reilly, Mary	Reilly, Mr. Duncan
reimel, beth	Reimers, David	Reinfried, Kay	Reinhardt, Jason	Reinhart, Gabriele	Reinhart, Robin
Reinhold, Lee	Reinholdt, Sally	Reisner, Kait	Reiss, Pati	Reiter, Jane	Reiter, Margaret
Rejto, Agnes	Rejto, Agnes	Remick-Simkins, Stacey	Remund, Barbara	Remus, Fred	Renardson, Fay
Rendon, Edward	Renfro, Robert	Rennacker, Ann	Renner, Cate	Rennie, Colin	Rennie, Silvia
Rensch, Pam	Renshaw Jr, Bob	Renteria, Maria Aurora	Renton, Barbara	Reo, Alice	Reola, Matt
Repasky, John	Repp, Jan	Repp, Jan	Resh, Brian	RESIN, ROBIN	Reskusich, Helen
Resley, Terri	Resner, Sandra	Resnick, Jonathan	Resnick, Ms. Mariejanneke J.	Resseguie, William	Reum, Peter
Reuscher, F. Carlene	Reuter, Mark	Revell, Darren	Revesz, MR. & MRS. BRUCE	Revilla, Oscar	Revilla, Oscar
Revord, Michael	rex, jared	Rex, Joy	Rex, Teresa	Reyes, Jesse	Reyes, Kimberly
reynolds, al	Reynolds, Ann	Reynolds, Dr. Peter	Reynolds, Emily	Reynolds, Erika	Reynolds, Heather
Reynolds, Jessica	Reynolds, K	Reynolds, Katie	Reynolds, Lisa May	reynolds, lloyd	Reynolds, Miriah
Reynolds, Rik	Reynolds, Sandra	Rhoades, David	Rhoades, Joseph	Rhoads, Doyle	Rhoads-Lucero, Amanda
Rhodes, Beverly	Rhodes, III, Robert W.	Rhodes, Janet	Rhodes, Jay	rhule, cindi	Ribeiro, Catherine
Ribnick, Lawrence	Ricard, Alexandra	Ricardo, Julian	Ricci, Diana	Ricci, Diana	Ricci, Jean
Ricci, Mark	Ricci, Peggy	Ricciardi, Anthony	Rice, David	Rice, Jay	Rice, Karol
Rice, Loree M.	Rice, Michelle	Rice, Miriam	Rice, Mr. Chris	Rice, Nathan	Rice, Tamyra

RICE, WALTER	rice-coughlan, virginia	Richard, Isabelle	Richard, Nancy	Richards, Donna	Richards, Emma
Richards, Gwen	Richards, Jocelyn	Richards, Kathleen	Richards, Paul	Richards, Steve	Richardsion, Angie
Richardson, Aleda	Richardson, Annie	Richardson, Bradley	Richardson, Gail	Richardson, Judi	Richardson, Leslie
Richardson, Lynn	Richardson, Matt	Richardson, Michelle	Richardson, Patrick	Richardson, Ray	Richdale-Robb, June
Richey, Michael	Richey, Paul	Richey, Sarah	Richey, Sharon	Richmond, CHEY	Richmond, Lonna
Richmond, Mark	Richmond, Michael	Richmond, Mrs Kay	Richmond, Robert	Richtfort, Robert	Rickson, Daniel
Ridder, Lynette	Riddick, Sandra	Ridenour, Patty	Rideout, Karen	Ridgard, Robert	Ridge, Mary
Ridgeway, Bill	Ridgley, Ms. Patricia	Ridgway, Kathi	Ridley, Steve	Ridolfo, Angela	Ridpath, Carolyn
Riebel, Linda	Riebesehl, Jill	Rieger, Myra	RIEK, PAUL	Rieman, Lila	Ries, Paul
Rife, Leslie	Riff, Christopher	Riffle, Julie	Rifkin, Adam	Rigano, Kimberly	riger, mr richard
Rigles, Seth	Rigles, Thomas	Rigotti, Giuliano	Riis, Jean	Rikel, Maralyn	Riley, Callie
Riley, JoAnn	Riley, Laura	Riley, Melanie	Riley, Ms. Mary	Riley, Nancy	Riley, Peter
Riley, Rita	Rimbos, Mr. Peter G	Rinaldi, Margaret	Rincon, Anna	Rincon, Clara	Rincon, D.
Ring, Geraldine	Ring, Melanie	Ringgaard, Line	Ringler, Thomasin	Ringquist, Matt	Ringquist, Rodd
Rings, Sally	Rio, Michael	Riobó, Maria Iglesias	Riordan, Kathleen	Riordan, Michael	Rios, Natalie
Rios, Susan	Ripp, Russ	Ripper, Barbara	risa, m	Riseam, Clive	Rising, C
Rising, Jan	Rising, Janet	Rising, Melanie	Riskin, Ron	Risser, Mrs Susan & Mr. Peter	risso, susan
Ristig, Michael	Ritchey, Mary Lynn	Ritchie, David	Ritter, Alissa	Ritter, Andrew	Ritter, Lynn
Ritter, Stephen	Rivard, K	Rivas, Anne	Rivenburg, Janice	Rivera, Carlos	Rivera, Claudia
Rivera, Jose	Rivera, Mr. Sergio	Rivera, Robert	Rivera-Diaz, Javier	Rivero, Renata	Rivers, Miriam
Rivers, Susan	Rives-Denight, Susan G	Rivett, Janice	Rix, Jeff	Rizzi, Gaetano	Rizzo, Barbara
Rizzo, Colleen M.	Robbin, Ms. Barbara	Robbins, Allie	Robbins, Brooke Teal	Robbins, E	Robbins, Ellie
robbins, valerie	Roberge, Marie	Roberson, Gracie	Roberson, Marsha J Holbert	Roberson, William	Robert, Brett
Robert, Edgar	Robert, Mr. Claude	Roberto, Rob	Roberts, Amy	Roberts, Annika	Roberts, Brock
roberts, cynthia	Roberts, Daniel	Roberts, David	Roberts, F Gayle	Roberts, Gail	Roberts, Janet
Roberts, Jean	roberts, jeannie E	Roberts, Jeff	Roberts, Ken	roberts, les	Roberts, Linda
Roberts, Marietta	Roberts, Marietta	Roberts, Megan and Doug	Roberts, Melissa	Roberts, Michael and Amy	Roberts, Mr. James
Roberts, Sherri	Roberts, Virginia	Robertson, Brian	Robertson, Brian	Robertson, Don	Robertson, Erna
Robertson, John	Robertson, Katherine	Robertson, Mary	Robertson, Michael	Robertson, Michael	Robertson, Mr. Myles
Robertson, Mr. Myles	Robertson, Stephanie	Robey, Steve	Robichaud, Julie	Robillard, Keith	Robin, Etta
Robinett, Margaret Christine	Robins, Jennifer	Robins, Kristen	Robins, Mr. William	Robinson, Amy	Robinson, Ben
Robinson, Casaundra	Robinson, Dameta	Robinson, Darrell	Robinson, Dorene	Robinson, Eric	Robinson, Eric
Robinson, Irene	Robinson, James	Robinson, Janet	Robinson, Janet	Robinson, Joel	Robinson, Kathryn
Robinson, Kay	Robinson, Lee	robinson, marci	ROBINSON, Mr. D	Robinson, Mr. William	Robinson, Nancy
Robinson, Nicola	Robinson, Peggy	Robinson, Ron	Robinson, Terri	Robinson, Trevor	Robison, Fred
Robison, Sean	Robles, Art	Robson, Ella	Robson, Eric	Robustelli, Joseph	Rocci, Fel
Rocco, Priscilla	Rocha, Ana	Rocha, Candace	Rocha, Candace	rocha, elio	Roche, John
Roche, Peter	Rochester, Mark	rock, west	Rocklyn, Aaron	Rocks, Brent	Rockwell, Anne
Rockwell, Dana	Rockwell, Jeffra	Rod, Vreni	Rodar, Jodi	Rodda, Eleanor	Rode, Ed
Rodefeld, Sarah	Roderigues, Mr & Mrs Dennis	Rodgers, Jane	Rodgers, Melissa	rodgers, patrick	Rodman, Lucy
Rodman, Shirely	Rodney, Ray	Rodrigues, Andrea	Rodrigues, António	Rodrigues, Jessica	Rodriguez, Angela
Rodriguez, Anthony	Rodriguez, B.	Rodriguez, Catherine	Rodriguez, David	Rodriguez, J	Rodriguez, Jenyfer

Rodriguez, Juan	Rodriguez, LORI	Rodriguez, Renee	Rodriguez, Simon	Rodriguez, Troy	Roe, Linda & Family of 6 Votes
Roebuck, Lynn	Roedner, Lenora	Roegner, Debby	Roehling, Jeff	Roehrich, Mary	Roelof, Jay
Roelofs, Curt	Roeske, Peggy	Roessel, Nancy	Roessing, Valerie	Rogan, Mr. Robert	Rogan, Sue
Rogan, Sue	Rogan, Sue	Rogan, Sue	Roger, Laurent	Rogers Jr., Robert	Rogers, Andrew
Rogers, Ann	Rogers, Barb	Rogers, Dorieta	Rogers, Jessica	Rogers, Lee	Rogers, Lynnette
Rogers, Meryl	Rogers, Mr. Joe	Rogers, Pamela	Rogers, Ray	Rogers, Robert	Rogers, Stephanie
Rogers, Tina	Rogers-Levy, Janice	Rogerson, Vicki	Roggenbuck, Thor	Rohand, Tristan	Rohde, Christine
Rohdenburg, Robert	Rohlf, Gerard	Rohner, Robert	Rohrbaugh, Stacey	Rohrer, John	Rohrer, Pearl
Rohrer, Roseanne	rohrer, w jean	Rohrer, Zachary	Rojany, Lauren	Rojas, Irene	Rojas, Juan
ROJESKI, MARY	Roke, Pattie	Rokosch, Mr. James	Rol, Anna	Roland, Jelica	Roland, Karen
Roland, Karen	Rolbeck, Mike	Rolfes, Mr. Kevin	Roll, Gregory	Rolle, Tim	Rollins, Dale
Rollins, Nell	Rollo, Pat	Rolsky, Mr. Bob	Rolston, Pat	Roma, Mary	Roman, Arnold
Roman, Deborah	Romanet, Dorothy	Romberger, Cynthia	Rome, Christine	Romenski, Solissa	Romero, Juanita
Romo, Roberto	Romppanen, Christa	Ronco, Garry	Roney, John	Rooney, Diane	Rooney, John P.
Rooney-Katsma, Lynne	Roos, Sandy	Roose, Art	root, judith	Root, Ms. Charlene	Root, Sharon
Ropp, Michelle	Rosa, Alan	Rosa, Angelease	Rosa, Nancy	Rosane, Douglas	Rosane, Douglas
Rosas, Jorge	Rosasco, Gregory	Rose, Amanda	Rose, B.	Rose, Barbara	Rose, Bernard
Rose, C.A.	Rose, Deirdre	rose, elana katz	Rose, Emily	Rose, Krista	Rose, Lori
Rose, Mary	Rose, Ms. Kathryn	Rose, Pat	Rose, Randall	Rose, Shanna	Rose, Sheryl
Roseberry, Bill	Roseborough, Jo	Rose-Jones, Olga	Rosemeyer, Jere	Rosen, Barbara	Rosen, Eric
Rosen, Helene	rosen, Michael	Rosen, Mr. William	Rosen, Steven	Rosenbaum, Cathy	Rosenbaum, Harold
Rosenbaum, Janette	Rosenbaum, Ron	Rosenberg, Anita	Rosenberg, Emily	Rosenberg, Larry	rosenberg, Pauline
Rosenberger, Jeannette	Rosenblatt, Melvin & Martha	Rosenblatt, Ms. Enid	Rosenblum, Barri	Rosenblum, Stephen	Rosenfeld, Wendy
rosenfield, lynne	Rosenkoetter, Jerry	Rosenkotter, Barbara	Rosenkrantz, Stewart	Rosenkranz, Ginny	Rosenlund, Tracey
Rosenqvist, Kristin	Rosenstein, David	Rosenstein, Dr. Carolyn N	Rosenstock, Sean	Rosenthal, Mr. Bill	Rosenzweig, Barbara
Rosenzweig, Barbara	Rosett, Patricia	Rosetty-Wagner, Elizabeth	Rosewich, Annette	Rosier, Amy	Rosinski, Katrin
Rosman, Ronja	Rosmer, David	Rosner, Anthony	Ross, Ahnne	ross, alice	Ross, Ann Marie
Ross, Audrey	Ross, Hamilton	Ross, Jean	Ross, Lynda	Ross, Lynn	Ross, Maria
Ross, Ms. Lilli	Ross, Rich	Ross, Sara	Ross, Susan	Rosselli, John, Sr	Rosser, Andrea
Rosser, Ellen	Rosser, Sam	Rossetti, Mark	Rossi, Dorothy	Rossi, Keri	Rossi, Zack
Rossin, Linda	Rossman, Ann	Rotermund, Kristy	Roth, Arlene	Roth, Augustine	Roth, Cc
Roth, Ellen Freeman	Roth, Gaby	Roth, Jerome	Roth, Steve	Rothe, Sharon	Rothman, William
Rothner, Melissa	Rothschild, Ron	rothstein, gary	Rothstein, Richard	Rotondo, Mary Ann	Rottman, Adam
Rotz, Bonnie	Roundy, Alton	Rourke, Anne	Rourke, Marie	Rouse, Frank	Rouse, Gregory
Roush, Barbara	Routley, Tammy	Rouvier, Julia	Rouyer, Helene	Rove, Frances	Rovnyak, Brett
Rowan, Nancy	Rowe, D.	Rowe, Julie	Rowe, Susan	Rowell, Ann	Rowell, Edward
Rowland, Marian	rowland, patrick	Rowland, Sandra	Rowley, Christopher	Rowlison, Suellen	Roy, Adam
Roy, Hildy	Roy, Linnea	Roy, Randy	Royal, Tammy	Rozell, Lori	Rozner, Jay
Rozniecki, Craig	RS, Jill	R-Shaw, K.k.	Rubalcava, Angelic	rubenstein, howard	Rubeo, Paul
Ruberg, Lionel	Rubesch, Erick	Rubiano, Linda	Rubin, Barbara	Rubin, Bunny Rosenthal Rubin	Rubin, Don
Rubin, Edward	Rubin, Enid	Rubin, Jonathan	Rubin, Mira	Rubinger, Carol	Ruby, Constance
Ruby, Jacki Fox	Ruby, Mr. Kenneth	Ruch, David	Ruckdaeschel, Sandra	Rucker, Ralph	Ruckman, Heather
Rudberg, Liane	Rudin, Ruth	Rudkoski, Amy	Rudkoski, Amy	Rudman, Linda	Rudner, Patricia
Rudnicki, Miranda	Rudolf, Rubens	Rudolph, Bonnie	Rudolph, Joyce	Rudolph, Joyce	rudy, karen
Rue, Carol	Ruesink, Martha	Ruger, Connie	Ruggeri, Wendy	Ruggiero, Lenore	Ruggles, Patricia

Ruhl, John	Ruiz, Arnold	Ruiz, Danilo SANCHEZ	Ruiz, Marina	Ruiz, O.	Ruiz, Peggy
Ruiz, Peggy	Ruiz, Peggy	Ruiz, Romie	Ruland, Kate	Rull, Anna	Rummerfield, Mike
Rump, Susan	Rump, Susan	Rundstrom, Susan	Rungis, Sniedze	Runion, Keith	Runion, Paul
Runyan, Anita	Runyon, Kristine	Rusch, Brenda	Rusciolelli, Donna	Rushfeldt, Diana	Rushforth, Sam
Rushing, Melanie	Rushing, Melanie	Rushing, Melanie	Rushing, Melanie	Rusk, Bob	Russell, Angela
Russell, J L	Russell, Michael	Russell, Michael	Russell, Patrick	Russell, Patrick	Russell, Paul
Russell, Toni	Russelle, Carole	Russick, Sharon	Russo, Anne	Russo, Jay	Russo, John C.
Ruth, Paula	Rutherford, Bruce	Rutherford, Jim	Rutherford, Susan	Rutherford, Susan	Ruthroff, Katharine
Rutigliano, Janet	Rutledge, Margie	Rutski, Madelene	Ruud, Delana	Ruwe, Ben	Ruzicka, Barbara
Ryan, Beth	Ryan, Carolyn	Ryan, Holley	Ryan, Juanita	Ryan, Laurie	Ryan, Mary
Ryan, Nancy	Ryan, Patrice	Ryan, Patricia B.	Ryan, Simba	Ryan, Susan	Rybicki, John
Rycombel, T J	Ryder, James	Ryder, Sheridan	Ryder, Sheridan	Rygiel, Rose	Ryland, Gail
Ryle, Kevin	Rynaski, Helen	Ryrholm, Gunnar	ryser, kathryn	Ryter, Gisela	Ryter, Joanna
S, Adi	S, Anna	S, Barb	s, c	s, d	S, j
S, John	S, John	S, Kathy	S, L	S, Mark	S, Melissa
S, Nerija	S, Paul	S, Sandra	S, Sumera	S, Tom	S., A.
S., Bonnie	S., C.	S., Raphael	S., Ron	S., Yezbel	Saadati, Aleida
Saalwaechter, Susie	Saari, Jani	Saarinen, Tamara	Saavedra, Jessica	Sabatini, Frank	Sabatini, Kathy
Sabato, Jay	Sabbagh, Amira	Sabinson, Mara	Sable, Jeanne	Sacchetti, Dianne	sacco, donye
Sachs, Janet	Sachter, David	Sachter, Judy	Sackmann, Jody	Sada, Marie-Lane	Saddlemire, Bud
Sadiq, Tracey	Sadkovsky, Vera	Sadkowski, Jacek	Sadler, Ed	Sadozai, Lorann	Saecker, Rosalie
Safdie, Elliot	Safken, Melody	Saftner, Mr. Bernie	Sager, Marilyn	Sahig, Felix	Sahlem, Lynn
Saied, Tammy	Sailer, Kathleen	Sailors, Emma Lou	Sainsbury, Paul	Saintin, Pierre	Saint-Marie, Mary
Sairam, Om	Saito, Thomas	Sak, Henry	Sakaki, Terumi	Sakoda, Kent	Sakoda, Ms. Fumiko
sala, emanuela	Salamon, Mark	Salas, Jan	Salazar, Francisco J	Salazar, Xenia	SalemDrake, Debra
Salerno Sigman, Michelle	Salerno, Donna	Salerno, Mary	Salerno, Suzanne	Salgat, Michael	Salina, Clara
Saling, Tamara	Salinger, Robert	salmon, william	Salof, Tanya	Salone, Margo	Salopiata, Sophie-Madeleine
Salstrom, Mr. Fredric	Salt, Max	Salter, Lynn	Salter, Susan	Saltzman, Barry	Salvatierra, Nancy
Salveson, Catherine	Salvner, Amanda	Salzman, Virgil	Sam, Sarah	Sametz, Hillary	Samp, Cecelia
Sample, Stephen	Samples, Shirley	Samson, Elizabeth	Samspon, T.a.	Samuel, Sheryl	Samuel, William
Samuelson, Dusti	Samuelson, Georgeanne	Samuelson, Karen	San Filippo, Linda	San Marco, Lesley	Sanchez, Dorothy
Sanchez, Jose	Sanchez, Jose Luis	Sanchez, Mary	Sanchez, Mary	Sanchez, Monica	Sanchez, Paul
Sanchez, Sergio	Sanchez, Sergio	Sanchez, Sr., Daniel J.	SanClementi, Charles	Sandberg, Mary	Sanders, Brenda
Sanders, Chris	Sanders, Gary	Sanders, Glenn	Sanders, Janine	Sanders, Joan	Sanders, Mr. Thomas
Sandknop, Kathy	Sando, Scott	Sandok, Florence	Sandoval, Deborah	Sandoval, Dore	Sandow, Chris
Sandretto, Laurie	Sandritter, Ann	Sands, Becky	Sanford, Ms. Julie	Sannella, Dr. Frank W.	Sanozidis, Kostas
Sansone, MD, Dr. V. R.	Sansone, Rocco	Santamaria, Rita Caruso	santi, ron	Santiago, Wilfredo r.	Santini, Linda
Santmyer, Amanda	Santopietro, Michael	Santora, Mr. Marc	Santos, Eloy	Santos, Lara	santos, Peta Smit
Santos, R	Sappenfield, Ryan	Saran, Harvinderjit	Sarandis, Saralyn	Sarandrea, Gwen	Saravanja, Natasha
Sardina, Evelyn	Sardina, Evelyn	Sarelas, Valerie	Sargeant, Helen	Sargent, Robert	Sargis, Susan
Sarmiento, Jc	Sarna, Jan	Sarne, Sabrina	Sarradet, Sandra	Sarraille, Marijeanne	Sata, Linda
Satchell, John	Sather, Elizabeth	Satler, Robert	Sato, Barry	Sato, Midori	Sato, Nancy
Satriano, Joseph	Satterfield, Douglas	Sattler, Jerry	Saucier, Haley	Sauer, Gretchen	Sauer, Laraine
Sauerhoff, Mr. Robb	Saul, Robert	Saul, Suzanne	Saunders, Joshua	Saunders, Melissa	Saunders, Richard
Savage, Edward	SAVAGE, MEGAN	Savage, Ms. Patricia	Savard, Judy	Savett, Mr. Adam	Savino, Heather
Savoia, Jo-Ann	Savoie, Brietta	Savoie, Suzie	Sawahata, Lesa	Sawcer, Jane	Sawicke, Janis
sawicki, e	Sawlani, Aneesh	Sawyer, Donald	sax, pat	Saxe, Stephen	Saxon, Rachel
Saxon, Richard	Saxon-Brooks, Ms. Diana	Saxton, Jan	Say, Isbeth	Sayers, Mark	Sayers, Tiffany

Sayre, Debbie	Sayre, Johannes	Scadova, Elizabeth	Scaglia, Katia	Scala, Michael	Scalia, Tom
Scally, Jessie	scalzi, francis	scalzi, francis	Scanlon, Kelley	Scanlon, Matt	Scantlebury, Jane
Scanzillo, Frank	Scanzillo, Frank	Scarborough, Ann	Scarborough, Eva-Genevieve	Scarfone, Louise	Scarlata, Rachel
Scarpinatto, Thomas	Scavezze, Barb	Scelsi, C.	Scena, Marian	Schacht, Timothy	Schachterle, Russell
Schackmann, Lavonne	Schad, Simone	Schade, Corey	Schader, Kevin	Schadt, Valerie	Schaefer, Bill
Schaeffer, Kathy	Schaeffer, Laura	Schaeffer, Michael	schaem, suzanne	Schafer, Robert	Schafer, Steven
Schaffer, Ellen	Schaffer, Phillip	Schager, Jason	Schall, James	Schamel, Raymond	Scharaldi, Daniel
Scharf, Steven	Scharinger, Schani	Scharlin, Dan	Schatz, Vivian	Schatzel, Deborah	Schear, Roberta
Schebach, Julia	Schechter, Cynthia	Scheck, Stephen	schecter, edward	Scheele, Cynthia	Scheelen, Robert and Dolores
Scheer, August	Scheeren, Stephen	Scheib, Curtis	Scheiderer, Heather	Scheirman, John	Schelk, Sherri
Schell, Tara	Schellenger, Candice	Schelman, Jay	Schelstraete, Francoise	Schena, Susan	Schenck, John
Schenkelberg, Christine	Scherbak, Elizabeth	Scherer, David	Scherer, Garry	Scherf, Theresa	Schettino, Chris
Schettino, Roseanne	Scheuer, Francis	Scheuring, Susan	Schick, Laurie	Schickendantz, Eric	Schieferecke, Angela
Schierburg, Bridget	Schierman, Mollie	Schiff, D	Schiffman, Lauren	Schildcrout, Nicole	Schildwachter, Steve
Schile, Robert J	Schiller, Maria	Schilling, Krystal	Schillo, Roberta	Schimpff, Wayne	Schindele, Paulette
Schiratti, RSM, Claudette	Schlaffer, Runa	Schläpfer, Nina	Schlatter, Jeanne	Schlegel, Karen	Schlemel, Pierre
Schlereth, Tiffany	Schlesinger, Fern	Schlesinger, Sybil E	Schlesinger, William	Schlomberg, Kurt	Schloss, Morley
Schloss-Birkholz, Gisela	Schluchter, Theresa	Schmatjen, Sheryl	Schmeling, Sheila	Schmelzer, Eva	Schmerling, Mark
Schmid, Debra	Schmid, Jackie	Schmid-miller, Alice	Schmidt, David	Schmidt, Eugene	Schmidt, Jacqueline
Schmidt, James	Schmidt, Janet	Schmidt, Jennifer	Schmidt, Justin	Schmidt, Kris	Schmidt, Kristine
Schmidt, Laurie	Schmidt, Leon and Marlene	Schmidt, Liz	Schmidt, Michaela	Schmidt, P.Jacquelyn	Schmidt, Ramona
Schmidt, Sarah	Schmidt, Susan	Schmidt, Susan	Schmidt, Terri	Schmiedlin, Stephen	Schmitt, April
Schmitt, Dianne	Schmitt, Karl	Schmitt, Karon	Schmitt, Lana	Schmittauer, John	Schmitz, Christiane
Schmitz, Xavier	Schmonsees, William	Schnabel, Mr. Erik	Schnatz, Sabine	Schnebelen, Jeffrey	Schnee, Hope
Schnee, Jane	Schneid, Lucy	Schneider, Christian P.	Schneider, Dan	Schneider, George	Schneider, Ginny
Schneider, Mary	Schneider, Mr. Marge	Schneider, N.	Schneider-Serio, B.	Schneidler, Sue	Schneller, Mr. Paul
Schnibbe, Richard	Schoch, Leonard	Schock, Katherine	Schoell, Fred	Schoen, Catherine	Schoenberg, Marc
Schoenberger, Richard	Schoene, William	Schofield, David	Scholl, Barbara	Scholl, Chris	Scholl, Jackson
Scholz, Denise	Schondelmeyer, Sandra	Schondelmeyer, Sandra	Schondelmeyer, Sandra	Schonewolf, Jack	Schongut, Emanuel
Schooley, David	Schoolmeesters, Eddy	Schoonover, John	Schoonover, Katherine	Schoppert, Amy	Schoppert, Linda
Schorey, Carmen	Schott, Joe	Schott, Sandra	Schoultz, Lisa	Schpok, Irwin	Schrader, Dennis
Schram, Ted	Schramm, Michael	Schramm, Ms. Peggy	Schrantz, Meryl	Schrauger, stewart	Schreibe, Anne
Schreiber, Barbara	Schreiber, John	Schreier, Jill	Schrempf, Steve	Schroeder, Colin	Schroeder, David
Schroeder, Kathy	Schroeder, Mark	Schroeder, Mary	Schroeder, Michael	Schroeder, Rick	Schroeder, Steve
Schroeder, Val	Schroeter, Nancy	Schropp, JoAnn	Schrupp, Lynne	Schubert, Gerd	Schuchard, Susan
Schuchart, Lawrence	Schueth, Steve	Schuetz, Corey	Schuetz, Ralf	Schuetz, Ralf	Schulman, Jason
Schulman, Linda	Schult, Holly	Schulte, Carol	Schulte, Georgiann	Schultenover, Yvette	Schultz, Cindy
Schultz, David	Schultz, Judy	Schultz, Lesley	Schultz, Mrs. Mary	Schultz, Peter	Schultz, Sidney
Schultz, Ted	Schultze, Annette	Schulz, Alexandra	Schulz, Jeannine	Schulz, Lane	Schumacher, Amy
Schumacher, Brandy	Schumacher, John	Schumacher, John	Schumaker, Karl	Schuster, Mike	Schuster, William

Schutt, Carol	Schwabauer, Elisha	Schwartz, Alan	Schwartz, Brian	Schwartz, David	Schwartz, David
Schwartz, Donald	Schwartz, Douglas	Schwartz, Elizabeth	Schwartz, Gail	Schwartz, Gail	Schwartz, Karl S
Schwartz, Mr. Eric	Schwartz, Nancy	Schwartz, Phebe	Schwartz, Randy	Schwartz, Randy	Schwartz, Roberta
Schwartz, Ronlyn	Schwartz, Steve	schwartz, tom	Schwartz, Voula	Schwartzberg, Lora	Schwartzman, Mr. Henry
Schwarzenberg, Mrs. Faioa	Schwede, Bette Ann	Schwegler, Tom	Schweiger, Nan	Schweitzberger, Gale	Schweitzer, David
Schweitzer, Delyn	Schweitzer, Eric	Schweizer, Scott	Schwenk, Felicia	Schwimmer, Dena	Schwimmer, Valerie Stoll
Schwinn, Margie	Schwyhart, Philip	Scibetta, Kimberly	Scollon, Suzanne B	Score, Tara	Scott, Abby
Scott, Betty	Scott, Brian M.	Scott, Carole	Scott, Dorinda	Scott, Gina	Scott, James-Michael
Scott, Jan	Scott, Jennifer	Scott, Joanne	Scott, John	Scott, K	Scott, Kent
Scott, L:ois	Scott, Leslie	Scott, Lindsay	scott, Meghan Malone	Scott, Mr. Harlan	Scott, Nolen
Scott, Pamela	Scott, Peter	Scott, Rachel	Scott, Raeann	Scott, Robert	Scott, Robert &Waynette
Scott, Russell	Scott, Susan	Scott-Harris, Nicole	Scotto, Hazel	Scoville, James	Scoville, Ms. P`
Scoville, Ms. P`	Scowen, Pat	Scroggins, Gloria	Scropos, Kat	Scullard, M.E.	Scully, Rosemary
Scuteri-Moore, Frances	Sdrolias, Yanni	Seabrook, Sharon	Seader, Scot	Seales, Pauline	Seals, Donny
Seaman, Nicholas	Seamans, James	Seapy, Dr. Roger	Sear, Linda	Searle, Helen	Searle, Michael
Searle, Shakira	Sears, Linda	Sears, Mary	Sears, Tessa	Seastone, Star	Seaver, Karls
sebanc, susan	Sebastian-Lewis, Ms. Harley	Sebring, Glenn	Sebrosky, Amanda	Secor, Glenn	Seda, Rosa
Sedlak, Stephen	Sedon, Douglas	seeburger, john	Seegers, Fritz	Seegers, Jo	Seegott, Mary
Seeley, Mm	Seelman, Elizabeth	Seely, Oliver	Seely, Suzanne	Seewagen, Jim	Sef, Steven
Sefcik, Dianne	Sefer-Stefancic, Ljubica	Segal, Ellen	Segarra, Vincent	Segat, Shana	Seger, Betty
Seger, Kimberly	Segur, Felicia	Seibert, Carl	Seidel, May Ruth	Seidler, Kathleen	Seidler, Kathleen
Seiferling, Halena	Seigel, Neil	Seigerschmidt, Barbara	Seil, Fredrick	Sekuterski, Gabby	Selander, Mr. Spencer
SELBY, STEPHEN	Selch, Ruthie	Selden, Pat	Seles, Andrew	Selig, William	Sell, Christine
Sellars, Beth	Sellars, Dante	Sellers, Andrew	Sellers, James	Sellers, Jennifer	Sellers, Marcus
Sells, Greg	Seltzer, Cerisse	Seltzer, Kathleen	Seltzer, Mr. Rob	Selya, R	Seminara, Terence
Semper, Regina	Sendra, Joan	Senegal, Aaron	Sengheiser, James	Senn, Lynda	Sennhenn, Carl
Sennning, Judith	Sentenn, Lynn	Seratti, Rosanne	Sercombe, Sarah	Sergeant, Joe	Sergienko, Peter
Serina, Mary Ellen	Serio, Linda	Sermons, Chris	Serra, Roberto Abela	Serra, Stephen La	Serrao, Vicky
Serratore, Danielle	Servadio, Jane and Rino	Servais, James	Servizio, Paul	sessa, andy	Sessa, Christopher
sethee, jai	Setticase, Mary-Anne	Seus, Regina	Sevald, Diane	severe, carol	Severns, Dayle
Sevier, Crystal	Sévilla, Caroline	Sewald, Michelle	Sewart, Ian	Sewart, Ian	Sewell, Karen
Sewell, Nate	Sexauer, Susan	Sexton, Elizabeth	Sexton, Hailey	Seyfried, Mr. Mike Michael	Seymour, Christopher
Seymour, Nancy	Seymour, Stephanie	Sgreccia, Stefano	Sgrillo, Marguerite	Shaaban, Marian	Shabi, Kathleen
Shacter, Francine	Shaddock, Tiffany	Shafer, Beth	Shaffer, Beth	Shaffer, Nicole	Shaffer, Renay
Shaffer, Tomoko	Shaffner, Anne	Shah, Nip	Shaia, Gerald	Shaiman, Marsha	Shakal, Joe
Shalat, Harriet	Shalev, Nadav	Shaller, Virginia	Shaloum, Tami	Shambayati, Niloofar	Shamblin, Harriet
shames-rogan, julie	Shand, Bonnie	Shank, Ronald	Shankar, Harini	Shankel, Ms. Georgia	Shanker, Adrian
Shanker, Anita	Shanklin, Ann	shanks, bill	Shannon, Danielle	Shannon, Faith	Shannon, Naneen Mary
Shaouy, Pam	shapiro, ellene	Shapiro, Eve	Shapiro, Irving	Shapiro, Kathryn	Shapiro, Leo
Sharkey, Ellen	Sharlock, Leslie	Sharma, Akhil	Sharma, Mukund	Sharp, Donna	Sharp, Dwite
Sharp, Kathryn	Sharp, Shari	Sharpnacck, Sherry	Sharrar, Karen	sharrer, john	Sharton, Tamara
Shatsky, Alex	Shattes, Wayne	Shattuck, Laurie	Shatzkin, Deb	Shaub, Kimberly	Shaughnessy, Anna
Shaw, Donald	Shaw, Donna	Shaw, Ian	Shaw, Ingrid	Shaw, James	Shaw, Lucinda
Shaw, Robert O.	Shaw, Stuart R	Shaw, Susan	Shaw, Taylor	Shawhan, Jason	Shawver, James
Shea, James	SHEA, JILLIAN	Shea, Kathleen	Shea, Mary	Shea, Michael	Shea, Mitchell

Sheade, Bruce	Sheahan, Maureen	Sheahon, Colleen	Sheardy, Robert	Shearne, John	Sheehan, Jon
Sheehan, Martin	Sheehan, Rita	Sheehy, Steve	Sheen, Robert	sheeran, john	Sheets, Jeff
Sheets, Melvin	Sheets, Mr. Gabriel	Sheets, Pat	Sheets, Sarah	Sheffield, Michael	Shehan-Hussein, Elizabeth
Sheiker, Debbi	Shelby, BC	Shelby, Charles	Shelby, Sharon	Shelby, Vaughan	Sheldan, Vijay
sheldon, Paul	Shelley, Kent	Shelley, Rev. Ian	Shelman, Dave	Shelton, Dean	Shelton, Sarah
Shemberg, Bea	Shemet, Laverne & Paul	Shemo, Mary-Alice	Shenas, Glenna	Shenk, Anna	Shepard, Margaret
Shepard, Rebecca	Shepard, William	Shephard, Phil	Shepherd, James	Shepherd, Laura	Shepherd, Leona
Shepherd, Marilyn	Shepherdson, Marjorie	Shepperson, Gwendolyn	Sheran, Lester	Sheresh, Richard	Sherfey, Janet
Sheridan, Lenore	Sheridan, Ms. Leslie	Sheridan, Tom	Sheriff, Brynne	Sherman, Ann	Sherman, Beth
Sherman, Chris	Sherman, Deena	Sherman, Frank	Sherman, Joyce	Sherman, L	Sherman, Leslie
Sherman, Martin	Sherman, Mike and Kathy	Sherman, Mike and Kathy	Sherman, Mr. David	Sherman, Mrs. Ruth	Sherman, Nicholas
Sherman, Nicholas	Sherman, Tom D	Sherman, Tom D	Sherman, Trisha	Sherman-Jones, Cynthia	Sherrel, James
Sherson, David	Sherwin, Robin	Sherwood, Bob	Sherwood, Kate	Sherwood, L	Sherwood, Lorraine
Shewchuk, Cris	Shibicky, Monika	Shield, Margaret	Shields, Alice	Shields, Alice	Shields, Farrah
Shields, Jennifer	Shields, Maggie	Shields, Tawnya	Shields, William	Shiels, Theresa	Shih, Ya Hui
Shilling, Bruce	Shimasaki, E.	Shimshin, Yael	Shinaberger, Christian	Shipler, Craig	Shipp, Michele
Shipp, Susan	Shirah, Elizabeth	Shirakawa, Kozue	Shirey, Linda	Shirk, Leslie	Shisila, Kerrie
Shively, Daniel C	Shively, Ella	Shively, Judy	Shivley, Julie	Shivley, Karen	Shliselberg, Aviva
Shock, Emma	Shoemaker, Sandra	Shoenfeld, Sharon	Shoham, Mr. Amit	Shontz, P.	Shontz, P.
Shore, David	Shore, Patricia	Shore, S	Shores, Michael	Short, Marjorie	Short, William
Shortess, Michele	Shotwell, Andi	Shotz, Alyson	Shoulderblade, Ms. Magoo	Shoulders, Nikki	Shoun, Ellen
Shouse, A	Shouse, Susan	Shovein, Karen	Showalter, James	Showers, Darren	Showers, MerleMerle
Shrivastava, Chinmaya	Shrock, Dean	Shuben, Jeffrey	Shubitz, Matthew	Shue, James	Shugars, Lester
Shulman, Janet	Shulman, Mr. Joseph	Shulof, Vicki	Shultz, Jamie	Shumaker, Steven	Shuman, Carolyn
Shuman, Laurence	Shumay, Ms	Shushan, Cheryl	Shuster, Marguerite	Shute, Brian	Shute, Roland
Shyshka, Mary	Siano, Mr. Christiaan	Sibley, Charlotte	Sichterman, Joan	Sickles, David	Sickmeier, Lyndon
Sicocan, Shannon	Siddique, Omar	Siddiqui, Saad	Siders, Jo	Sides, Lee	Sidley, Nathan
Sidofsky, Carol	Siebert, Joleen	Sieck, Dean and Judith	Sieck, Joanne	Siefken, Josie	Siegal, Andrew
Siegel, Mr. Charles	Siegel, Richard	Siegel, Scott	Siegel, Sheila	Sieger, Kip	Siegfried, Diana
Siegner, Sandra	siegrist, toni	Sierra, Martina	Sievers, Kari	Sievers, Luanne	Siewert, Louise A.
Sigel, Denise	Sigler, Dean	Sikes, Cathy	Sikina, Heidi	Silberg, Aron	Silberman, Linda
Silburn, Daniel	Silcock, Jeffrey	Silcock, Jeffrey	Silence, Rebecca	Siler, Samantha	Silin, Jimmy
Silin, Jimmy	Sill-Holeman, Jeanette	Sills, Eric	Silva, Gail	Silva, Karen	Silva, Stephen
Silva, Welthy	Silvano, Liliana	Silver, Cassandra	silver, Mrs. margaret	Silver, Patricia	Silver, Sabrina
Silver, Victoria	Silver, Victoria	Silverman III, B.e.	Silverman, Laura	Silverstone, Joan	Silverwood, George
Silvestre, Beatrice	Silvey, Kevin	Sim, James	Simancek, Diane	simmond, bob	Simmonds, Beatrice
Simmonds, Beatrice	Simmons MD, Timothy	Simmons, Adrienne	Simmons, Anthony	Simmons, Delton	Simmons, Gena
Simmons, Jarrod	Simmons, Jock	Simmons, Steve	Simmons, Steve	Simms, Cynthia	Simms, Jr., Herman S.
Simon, Jill	Simon, Nancy	Simon, Philip	Simon, Shirley	Simonds, Barbara	Simonds, Linda
Simone, Beverly	Simone, Dorethea	Simone, Louise Pisano	Simonet, Haidie	Simonian, Raffe	Simonich, Claire
Simonsen, Judith	Simonson, Shawn	Simpao, Diane	Simpkin, David	Simpkins, William	Simpson, Brian
Simpson, Don	Simpson, Katie	Simpson, Kenneth	Simpson, Lin	Simpson, Maggi	Simpson, Malcolm G
Simpson, Meaghan	Simpson, Robert	Simpson, Thomas R	Sims, Layne	Sims, Margaret	sims, Mr. bruce
sims, Mr. bruce	Sims, William	Sinclair, Carol	Sinclair-Smith, Karen	Singer, Barbara	Singer, Charles
singer, dk	Singer, Garry	Singer, Greg	Singer, John	Singer, Joseph	Singer, Robin
Singer, Rose	Singh, Bhagat	Singh, Hardeep	Singleton, Sandra	Singsen, Judith	Singwi, Veena

Sini, Maurizio	Sinohui-Lara, Ashley	Sinor, Madeleine	Sipiora, Alexandra	Sipoccz, James	Sirlin, Morgan
Sirt, Joshua	Sisson, Ed	Sitkoski, Selena	Sitnick, Joan	Siva, Amara	Sivan, Vidya
Sivaramakrishnan, Arvind	Sivaramakrishnan, Arvind	Sively, Susan	Sivley, Steve	Sivulich, lenore	Sixtus, Michael
Sjostrom, Callie	Skappel, Robert	Skei, Ingrid	Skelly, Caz	Skelly, Lesley	Skelton, Mrs. Julie
Skibinski, Edward&Lynn	Skiendzielewski, DANIELLE	Skindziel, Dawn	Skinner, Brian	Skirbunt-Kozabo, William	Skirvin, Laurence
Skjerven, Colleen	Skolnick, Ms. Kate	Skonberg, Linda	Skotnes, Darren	Skrimstad, Kelly	Skuce, Carla
Skupien, Larry	Skwara, Alexandra	Skye, Kat	Skyrm, Carol	Slabe, Anamarija	Slack, Kelley
Slade, Colette	Slade, Tim	Slagle, Ms. Teri	Slanger, Nancy	Slanger, Rhoda	Slapke, Timur
Slater, Bruce	Slater, Bruce	Slater, Leslie	Slater, Nick	Slater, Stanley	Slater, Steven
Slater-Giglioli, Ms. Julie	Slattery, Marie	Slaughter, Bob	slauson, kevin	Slavens, Jeff	Slawinski, Katherine
Slawsby, Danielle	Slay, Stacie	Slifer, Cleo C	Slifer, Cleo C	Slifka, Matthew	Slining, Alice
Sliwka, Piotr	Sloan, Tom	Sloat, Dale	Sloat, Jan	Slock, Geri	Slocum, Jean
Slocum, Joel And Deborah	Slomer, Robert	Slosburg, Marsha	Slotnick, Lauryn	Small, Barbara	Small, Cynthia
Small, Mews	Small, Sally	Smalley, Beverly	Smaluk-Nix, Kathleen	Smarandoiu, Andrei	Smaron, Traé
Smarr, Janet	Smarr, Todd	Smead, Sharon	Smedberg, Virginia	Smellow, Dan	Smereck, Amy
Smiddy, Terra	Smiglicki, Steven	Smile, Serenity	Smiley, C. M.	Smiley, Matt	SmilingCoyote, Jean
Smisek, Betty	Smital, Peter	Smith and Hill, Lynn and Edward	Smith, Adrian	Smith, Alan	Smith, Allyson
Smith, Anna	Smith, Baker	Smith, Bernita B	Smith, Bill	Smith, Bruce	smith, bryce
Smith, Carl	Smith, Carolyn Price	Smith, Cecil	Smith, Charles	Smith, Chris	Smith, Courtenay
Smith, Daniel	Smith, Dave	Smith, David	Smith, David	Smith, Dea	Smith, Debra
Smith, Denise	Smith, Diane	Smith, Diane	Smith, Donald	Smith, Donna	Smith, Drew
Smith, Ellen	Smith, Evan	Smith, Frank	Smith, G	Smith, Glenn	Smith, Greg
Smith, Greg	Smith, Gregory	Smith, Indira	Smith, J	Smith, J.T.	Smith, Jaime
Smith, Janell	Smith, Janet	Smith, Jason	Smith, Jaszmene	Smith, Jennifer	Smith, Jerry
Smith, John	Smith, John	Smith, Juliet	Smith, June Burlingame	Smith, Kathleen	Smith, Kathryn
Smith, Kathryn	Smith, Keelan	Smith, Kellie	Smith, Kenna	Smith, Kevin	Smith, Kevin
Smith, Kevin	Smith, Kevin	Smith, Kevin	smith, kristi	Smith, Kristin	Smith, Larry
Smith, Laura	Smith, Lauren	Smith, Linda	Smith, Linda	Smith, Lisa	Smith, Lori
Smith, Louis	Smith, M	Smith, Mark	Smith, Mark	Smith, Mark S	Smith, Mary
Smith, Matthew	Smith, Melisande	Smith, Melody	Smith, Michael	Smith, Michael John	Smith, Mike
smith, mollie	Smith, Mr. Ronald	SMITH, Ms. DEBORAH	Smith, Ms. Edwina R.	Smith, Nancy	Smith, Nancy
Smith, Nicole	Smith, Pam	Smith, Patricia	Smith, Patrick	Smith, Patty	Smith, Pheobe
Smith, Phillip	Smith, Richelle	Smith, Rick	Smith, Robert	Smith, Ronald	Smith, Sara
Smith, Sara	Smith, Scott	Smith, Shirley	Smith, Sian	Smith, Stephanie	Smith, Stephen
Smith, Susan	Smith, Suzanne	Smith, Suzanne	Smith, Taylor	Smith, Tom	Smith, Tony
Smith, Trevor	Smith, Tyra	Smith, V	Smith, W.	Smith, Wesley	Smith, West
Smith, William	Smith-Debnam, Justin	Smith-Dike, Linda	Smithers, Margaret	Smithwick, Eleanor	Smoak, Copley
Smock, Amanda	Smoker, Art	Smudin, Carole	Smyth, Robert	Smythe, Stewart	Snavely, Kathie
Snee, Jim	Snell, Barbara	Snell, Karen	Snellstrom, Rex	Snider, Jay	Snitzer, Eileen
Snively, Mr. James	Snook, Marcia	Snook, Richard	Snow, Mary	Snowdon, Hilton	Snyder, Carol
Snyder, Dan	Snyder, Eleanor	Snyder, Irv	Snyder, John	Snyder, Lawrence	Snyder, Lynn
Snyder, Theodore C.	Snyder, Tiffany	snyder, valerie	Snyder, Wanda Webber	Snyder~Baldonado, Elizabeth	Soares, Faye
Soares, James	Soban, Alenka	Soban, Alenka	Soban, Alenka	Sobanski, Sandy	Sobe, Richard
Sobel, Marcia	Sobel, Marilyn	Sobota, Dr. Patrick	Sockwell, Liza	Soddano, Lara	Soddy, Diane
Sodfried, Bianca	Sodfried, Bianca	Sodrel, John	Soenksen, Mark	Soest, JoAnne	Soffler, Mrs. Judy W W
sogolow, katherine	Sogorka, Amber	Sohl, Erica	Sokol, Sigmund	Solberg, Nancy	Soldavini, Shirley
Solell, Julie	Soley, Angela	Soligo, Piero	Solis, Sergio Andres	Solisti, Kate	Solle, Laurence
Solomon II, M	Solomon, David	Solomon, Dorothy	Solomon, Francis	Solomon, Jodi	Solondz, Marc

Soltero, John	Somerset, Russell	Somlyo, Louise Lora	Sommer, Curt	Sommer, Hannelore	Somogyi, Cosme
Sondermann, Mary	Sondheim, Steven	Song, Rebecca Anshell	Songalia, Elizabeth	Songan, Ian	Sonnenblick, Rachel
Sonnenschein, Lotte	Sontag, Anthony	Sopher, Nancy	Sopoci, Ron	Sordill, Michael	Sorensen, Barbara
Sorensen, Doug	Sorensen, Matthew	Sorensen, Rolf	Sorensen, Rolf	Sorey, Robert	Soria, Peter
Sorlucco, Lucy	Soronen, William	Soroos, Dr. Carol S	Sorrell, Mary	Sorrells, James	Sorrentino, Alessandra
Sorum, Robert	Soteropoulos, Patricia	Soto, Edy G	Soto, GH	Soto, Karla	Soto, Robert
Sottile, Lisa	Soucek, P.P.	Souder, Ruth Kay	Soule, Craig	Soule, Victor	Soulias, Audra
souza, john	Souza, Mike	Sovey, Marjorie	Spada, Mr. Leonard	Spaeth, Jane	Spagna, Dr. George
Spahle, Matt	Spahr, Tami	Spaker, Jordan	Spalding, Anne	Spann, Martha	Spanski, Linda
Sparks, Bob	Sparks, Diane	Sparlin, Shauna	Spaulding, D.	Spaulding, Stephen	Spear, Faith
Spear, Jana	Spear, Jesse	Species, Scott	Speck, Misty	Speed, Andrea	SPEELMAN, ALAN
Speer, Cheryl	Speicher, Carol	Speidel, Barbara	Speidel, Kurt	speiser, bob	SPELBRING, SALLY
Spence, Dave	Spence, Fiona	Spence, Kathryn	Spence, Liter	Spencer, Allison	Spencer, Brent
Spencer, D R	Spencer, Deborah	Spencer, James	Spencer, Jeffrey	spencer, kathleen	Spencer, Martha
Spencer, Mrs. Gayle T	Spencer, Patricia	Spencer, Penny	Spencer, Rebekah	Spencer, Rita	Spencer, Tabitha
Spenger, Constance	Spengler, Susan	Spengler, Susan	speno, charlie	Speranza, Kathryn	Sperline, George
Spezakis, Marina	Spicer, Camilla	Spicer, Vivi	Spiegel, Kimberly	Spiegelman, Martha	Spiers, Barbara
Spiers, Barbara	Spillers, George	Spinach, Jennifer	Spinelli, Nancy	Spitz, Jon	Splan, Mary
Splitt, Sarah	Spoden, Lynn	Sponnoble, Susan	Spottswood, Dana	Spradlin, Karen	Spradlin, Michael
Sprague, Gayle	Sprague, Ryan	Spratley, Richard	Spring, Bruce	Springer, Carol	Springer, Cynthia
Springer, Dr. Haskell	Springer, John	Springer, Steven	Sproat, Jan Lee	Sprouse, D.V.M., Sharon	Sprow, Janice
Spurlin, Brenda	Spurlin, Timothy	Spurling, Dominique	Spurling, Leslie	Spurlock, Carola	Spurlock, Katie
Squire, Julie	sr, Dennis Barbato	Sr, Philip Kinneer	Sr, Richard Gardner	sr,, Thomas Flowers	Sridhar, K.
Srivatsa, Guha	Srnoguy, Lilyana	Sschwartzman, Liya	St. Clair, Amy	St. Clair, Delene	St. Germaine, Gerald
St. John, Barbara	St. Peter, Sara	St.Pierre, Angelique	Staab, Alfred	Stabinski, Lea	Stabinski, Lea
Stabler, Jessica	Stacey, Ric	Stachnik, Holly	Stacy, Madeline	Stacy, Phillip	Stadelman, John
Stadt, Doyle	Staff, George	Stagi, Kathy	Stahl, Aletha	Stahl, Hal	Staight, Christine
stales, stephen	Stallone, Craig	Stallone, John	Stalnaker, Sonja	Stalnaker, Ward	Stamets, Leigh
Stamm, Marvin	stamm, patricia	Stamos, James	stamp, Ms. barbara	Stamport, Sam	stamps, gail
Stamps, Jennifer	Stanback, Fred	Stanberry, Beth	Stancliffe, Elizabeth	Stancliffe, Julia	Standal, Gro
Standeford, Sandra	Stanek, Marsha	Stang, Petra	Stang, Petra	Stange, Elizabeth	Stanger, Andrew
Stankiewicz, Peter	Stanley, Cathea	Stanley, Curtis	Stanley, David W.	Stanley, Deborah	Stanley, Michael
Stanley, Robert	Stanley, Tamara	Stanojevic, Erica	Stansbury, Katherine Anne	Stansfield, Gerald	Stansfield, Jack
Stanton, Joan	Stanton, Leigh	Stanton, Vince	Stapelfeldt, Horst	Stapler, Carl	Stapleton, Billie
Stapp, Dale	Stapp, Dale	Star, Relf	Star, Star	Starble, Jennifer	Starbuck, Lucy
starin, carolina	Stark, Carolee	stark, jan	Stark, Lauren	Stark, Robert	Stark, Robert
Stark, Tom	Starkovich, Rachael	Starkweather, David	Starlin, Clay	Starling, Leonard	Starr, Jeffrey
Starr, Jennifer	Starr, Kellie	Starr, Susan	Stasyshyn, Graeme	Statland, Joyce	Staton, Janiece
Staub, Wendy	Staudt, Deb	Stauffeneker, Emily	Stauffer, Georgia	Staunton, John	Stavely, Jary
Stavis, Mr. Alex	Stavrides, Alex	Stavros, Susan	Stawinoga, Greg	Stead, Patricia	Steadmon, Jason
Stearley, Pamela	Stearns, Virginia	Stebbings, Gayle	Stebbins, Diana	Stebbins, Tracy	Steber, Maureen
Stebner, Sean	Steck, Burton	Stedman, Donald	Steele, Ann	Steele, Brad	Steele, DB
Steele, Marrion	Steele, Mary	Steely, William	Steen, Pam	Steenburg, Cindy	Steenburgh, Michael
Steenhoven, Jon	Steensma, Katherine	Steepy, Susan	Steessi, Wes	Stefacek, Laura	Stefancic, Stanley
Stefancich, Vicki	Stefanick, Peggy	Stefano, Ms. Courtney	Steger, Ruth	Stehle, Alice	Steijn, Alice
Steil, Ken	Steimer, Alex	Stein, alice	Stein, alice	Stein, alice	Stein, alice

Stein, Cindy	Stein, Diane	Stein, E	Stein, Ferrell	Stein, Irma	Stein, Laurel
Steinbach, Jonathan	Steinberg, Ruth	Steiner, A.l.	Steiner, Daniela	Steiner, Lora	Steiner, William
Steinfeld, John	Steinfeld, Michael	Steinhardt, Helene	Steininger, Bob	Steininger, Lorenz	steinke, don
steinke, don	steinke, don	Steinman, Scott	Steinmetz, Tom	Steinmuller, James	Steinmuller, James
Steitz, Mr. Jim	Stelboum, Judith	Stelcz, Laura	Stella, Michael	Stellato, Vickie	Stenberg, Bill and Fran
Stepanian, Jessie	Stephan, Dorothea	Stephan, Roberta	Stephan, Stephanie	Stephen, Ariana	Stephens, Kevin
Stephenson, Jennie	Stephon, Sandra	Sterman, Loren	Stern, Ellen	Stern, Karli	STERN, ROBERTA
Stern, Stephanie	Sternberg, Peter	Sterrett, Katy	Stertz, Angela	Stet, Mac	Stetler, David H.
Steussy, Cynthia L.	Steussy, Dennis	Stevens, Brad	Stevens, Carolyn J.	Stevens, Carolynne	Stevens, Christi
Stevens, Cris	Stevens, Dan	Stevens, David	Stevens, Dennis	Stevens, Earl	Stevens, Eugenia
Stevens, Gavi	Stevens, Mimi	Stevens, Mr. Anthony	Stevens, Ms. Trish	Stevens, Summer	Stevenson, Joey
Stevenson, Lisa	Stevenson, Martha	Stevenson, Mr. Douglas	Stevenson, Richard	Stevenson, Richard	Stevenson, Sebastian
Steward, Daniel	Stewart, Angela	Stewart, Betty	Stewart, Don B	Stewart, Donald	Stewart, James
Stewart, Jennifer	Stewart, Kara	Stewart, Laine	Stewart, Laura	Stewart, Lucretia	Stewart, Margie
Stewart, Nancy	Stewart, Olga	Stewart, Richard	stewart, tammy	Stewart, William	Stewmon, Lori
Stickney, Karen	Stidham, Charles	Stiehl, Joanna	Stiener, Joseph	Stiff, Chris	Stiles, Kathleen
Stillings, Ms. Deanna	Stillwaggon, Daniel	Stillwater, Bonnie	stillwell, gary	Stillwell, Marian	Stimpson, Lisa
Stimson, Karen	Stimson, Katrina	Stine, Janice	Stinnett, Mike	Stinson, Loree	Stinus, Sharon
Stirpe, D	Stoak, Debbie	Stockdill, Nelson	Stocker, Dr Michael	Stockton, Gigi	Stoddard, Donna
Stoddard, Isaac	Stoddard, Wade	Stodola, Beatrice	Stoeckel, Sue	Stoermer, Riley	Stofan, Sandra
Stoffel, Sandra	Stoffers, Joyce	stoike, richie	Stok, Sebastiaan	Stokem, Kenneth	Stokes, Lori
Stokes, M	Stolecki, Ralph	Stolfi, Jackie	Stone, chris	Stone, Dr. Peter	Stone, Hattie
Stone, Jeffrey	Stone, Jennifer	Stone, Kathryn	Stone, Mr. James	Stone, Sheila	Stone, Stephanie
Stonecipher, Rob	Stoneham, Walter	Stonehawk, Mika	Stoner, Dorothy	Stoner, Marc	Stonier, Polly
Stookey, Jeff	Stookey, Mary	Stopfer, Daniel	Stopka, Wade	Storer, Alison	Stork, Sharon
Storm, Laurie	Story, Tiffany	Stotelmeyer, Richard	Stotts, Bruce	Stoudt, Kenneth	Stoufer, Leanna
Stoufflet, Jean-Luc	Stoupis, Dimitri	Stout, Paul	Stout, Susan	Stover, Charry	Stover, Jon
Stover, W. Andrew	Straatman, Mr. Berrie	Strader, Ms. Rachel	Stradtman, George	Stram, Veda	Strasser, Joy
Strasser, Susan	Strate, Kris	Stratten, Ann	Stratten, Ann	Stratten, Ann	Stratton, Anthony
Stratton, Dorothy	Straub, Mary	Strauss, John	Strauss, Stephen	Strauss, Terry	Strausser, Lori
Straw, Matt	Strawn, Mike	Strayer, Leah	Streett, Eric	Streier, Randall	Strelke, Charleen
Strempke-Durgin, Ryan	Strickland, Mr Phil	Strickland, Mr Phil	Strickler, Mr. James	Stricklin, A.	Strik, Mr. Nicolaas
Strileckis, Ann Marie	Strimbu, M J	Strobel, Doug	Strodl, Nancy	Strohm, Shelley	Stroke, Marija
Strom, Kirsten	Strom, Stephanie	Stromberg, Karl	Stromgren, Jeff	Strong, James	Strong, Laura
Strong, Laura	Strothkamp, Kenneth	Stroud, Alice	Stroud, Sally	Stroud, Vanessa	Stroupe, Frank
Strubbe, Laurie	Strunk, Sandy	Struthers, Sue	Stuart, Annie	Stuart, Linda	Stuckey, Richard
Stuckey, Thomas	Stuckmeyer, Bob	Study, John	Studzinski, Bill	Stuehler, Helen	Stuhl, Emma
Stull, Julie	sturino, angelo	Sturtcman, Robb	Stutsman, David	Styc, Kathleen	Styga, Chris
Su, Gloria	su, h	Suarez, Mariu	Suarez, Melissa	Suarez, Moraima	Suarez, Rene
Such, Renee	Suchenicz, Carolyn	Suchy, D.	Suda, Maryska	Sudimack, Jennifer	Sudlow, Patrick
Suess, Jill	Sugai, Moto	Suidan, Aida	Sulaiman, Adewumi Isola	Sulliman, Elizabeth	Sullivan, Ann
Sullivan, Barbara	Sullivan, Diane	Sullivan, Dianne	Sullivan, Gail	Sullivan, Janet	Sullivan, Jerome
Sullivan, Joan Paul & Pj	Sullivan, John	Sullivan, Kate	Sullivan, Martha	Sullivan, Nancy	Sullivan, Sharon
Sullivan, Sharon	Sullivan, Steven	Sullivan, Tad	Sullivan, Teresa	Sullivan, Theresa	Sumida, Kathleen
Summer, Indigo	Summers, Amanda	Summers, Jan	summers, Janine	Summers, Robert	Summers, Robert
Sunada, Kristin	Sunara, Ana	Sundarajan, Aditu	Sunder, Manjari	Sundquist, Elizabeth	Sunfire, Michsel

Suozzo, Chris	Sur, Penny	Suranyi, Anna	Sure, Ned	Surton, Elizabeth	Sussman, Ilene
Sussmann, Margaret	Sutherland, Arthur	Sutherland, Hugh	Sutler, Christopher	Sutler, Steven	Sutriasa, Shakti
Sutton, Ellyn	Sutton, F	Sutton, F	Sutton, F	Sutton, Francine	Sutton, M. S.
Sutton, Marcia	Sutton, Matt	Sutton, Peter	Suttpm, Janet	Svehaug, Rolf	Svidler, Mariano
Svidrak, Maryana	Swaim, Lauren	Swain, Jacques	Swain, Miss Judith	Swain, Richard	Swanberg, Gabrielle
Swank, Carrie	Swanke, Schurkey	Swanson, D	Swanson, Deborah	Swanson, Doug	Swanson, Dru
Swanson, J	Swanson, Keith	Swanson, Michael	Swanson, Tara	Swanson, William	Swart, Stanley L.
Swart, Stanley L.	Swartz, Kathleen	Swartz, Steve	Swedlow, Barry	Sweeney, Donald	Sweeney, Mark
Sweeney, Therese	Sweeney, Wesa	Sweeny, Art	Sweeny, Peter B.	Sweeton, Margaret	Sweig, Patricia
Swenning, C	Swenor, Mark	Swenson, Jean	Swett, Robert	Swick, Chelsea	Swiencicki, John
Swierkosz, Mr. Joe	Swift, Darren	Swift, Robert	Swihart, Dave	Swilling, Mary	Swindell, Elak
Swink, Harrell Dean	Swinson, Kim	Swisher, Sandra	Switalski, Diane	Switzer, Richard	Switzer-Tatum, Paulette M.
Sydnor, Giles	Syen, Helen	sykes, freddie	szabo, istvan	Szabo, Mark	Szalewski, Circus
Szilagyi, David	Szumal, R.a.	Szumlas, Nick	Szymanski, Kathleen	Szymanski, Robert	Szymoniak, Linda
T, Julie	t, Mrs. Susan	T, Seth	T., C.	T., J.	T?ma, Richard
Tabakin, Bonita	Tabb, Amy	Tabellione, Cecelia	Tabolt, M. L.	Tabor, K	Tack, Martha
Tacker, Barbara	Tackett, Troy	Taddiken, Mary	Taff, Joyce	Tahmassbi, Fay	Tai, Helen
Taillade, Line	Taina, Hilkka-Maija	Tait, Ann	Tait, Barbara	Tait, Joseph	Takacs, Carla
Takatsch, Mrs. Julie	Takush, Kathie E	Talbert, Ronald	Talbot, Cat	Talbot, David	Talbot, James
Talbot, Karim	Talbot, Margaret	Talbot, Thomas	Talcott-Fuller, Julie	Talle, Tricia	Talley, Frosti
Talsky, Marvin	Tam, William	Tambellini, Mindi	Tamimi, Nawal	Tamulevich, Stan	Tan, Kristen
Tanaka, Elaine	Tanaka, Janice	Tanaka, Ko	Tandetnik, Igor	Tangney, James	Tanguma, Barbara Stanford
Taniwaki, Marge	Tankersley, Don	Tanler, Ben	Tanner, Bonnie	Tanner, Jeff	Tanner, Jennifer
Tanner, Karen	Tanner, Todd	Tanous, Felicity	Tanowitz, Wendy	Tansill, Mr. Roy	Tanzillo, Andrew
Tapiero, Abel	Taplin, Joan	Tapp, Yvette	Tapper, Shannon	Tarabocchia, April	Taratula, Alec
Tarbi, Ms. Nora a	Tarkhanov, Semen	Tarmann, Natascha	Tarnutzer, Elaine	Taroli, Garry	Tarpley, Matthew
Tarrant, Paul	Tartaglia, Maria	Tartaglia, Prof. Denise J.	Tarverdians, Andre	tashiro, terance	Taslit, Marc
Tassinari, Thomas	Tatom, Jeff	Tatro, Bradley	Tautaliana, M	Taveras, Jennifer	Tawney, Kathryn
Taylor, Alyna	Taylor, Amy	Taylor, B	Taylor, Brenda	Taylor, Cindy	Taylor, Daniel
Taylor, Debbie	Taylor, Deborah	taylor, donald	Taylor, Donald Doug	Taylor, Edward	Taylor, Gabby
Taylor, Greg	Taylor, Heidi	Taylor, Jennifer	Taylor, John	Taylor, John H.	Taylor, Joy
Taylor, Keith	Taylor, Keith	Taylor, Kelly	Taylor, L Cam	Taylor, Llew	Taylor, Lucy
Taylor, Lynn	Taylor, Melvin	Taylor, Nicole	taylor, r	Taylor, Richard	Taylor, Stefan
Taylor, Walter	Taylor, Wendy	Tays, Shawn	Taysom, Glen	Tazzia, Charles	Teaford, Ben
Teagardin, Sharon	Tealdo, Susie	Teamann, Bill	Tedesco-Kerrick, Terry Tedesco	Tee, Molly	Tee, Tevet
Teegardin, Susan	Teel, S.	Teeple, Kevin	Teevan, Mr. John	Teffeau, Lauren	Teffeteller, Tony
Tefft, Robert	Tegstam, Sara	Tehan, Patricia	Teich, James and Judy	Teich, James and Judy	Teich, James and Judy
Teich, James and Judy	Tejeda, Katira	Telfair II, Ph.D., Ray C.	Tell, Sheri	Telles, Doris	Tellez, Kimberlee
Tellez, Paola	Tembreull, Roger	Temnikova, Irina	Temnikova, Irina	Tempelman, Steven	Temple, Melissa
Temple, Ms. Michele	Templet, Mel	Templeton, Bonnie	Templeton, Sara	Tenaglia, Carol	Tenaille, Jean
Tenerelli, Brenda	Tenerowicz, Kristina	Teneycke, Lynne	Tennant, Linda	Teper, Shannon	Teplin, Lynne
Tepolt, Janet	Terenzio, Gudy	Tereschak, Cassandra	Tergesen, Ron	Terrell, Shanin	Terriault, Michelle
Terrill, Allen	Terrill, Lynn	Terrock, Jennifer	Terry, Lexi	Terry, Michael	Terry, Robin
Terry, Susan	Terveen, Ruben	Tescher, Patricia	Tesoro, Peter	Tessari, Diane	Tessman, Jacqueline
Tetenbaum, Lawrence	Tetenbaum, Lawrence	Tettemer, Royal	Teunissen, Christina	Teutsch, Sallie	Tevelow, Carla
Thaler, Gary	Thall, Jennifer	Thapa, Rajeev	Tharsing, Lynn	Thayer, Mostyn	Theis, William

Theisen, Mary	Theiss, Donald G.	Thelander, Donna	Themm, Caroline	Themm, Melinda	Theobald, John
Theobald, Kathryn	Thibaudeau, Mary	Thibodeau, Dave	Thibodeaux, Vanessa	Thiel, Mary	Thiele, Martin
Thielman, Patricia	Thieme, Bridgit	Thigpen, Alice	Thistle, Linnea	Thixton, Sauandra	Tholl, J. David
Tholl, Jonathan	Tholl, Patricia	Thollaug, Julai	Thoma, Debby	Thomas, Alan	Thomas, Alicia
Thomas, Andrew	Thomas, Barbara	Thomas, Bob	Thomas, Debbie	Thomas, Eleanor	Thomas, Eva
Thomas, Jean	Thomas, Jean	Thomas, Jeff	Thomas, Kathleen	Thomas, Ken	Thomas, Leonard
Thomas, Lisa	Thomas, Pat	Thomas, Pat	Thomas, Robert	Thomas, Saul	Thomas, Shad
Thomas, T	Thomas, Todd	Thomas, Trenna	Thomas, Trevor	Thomas-Brown, Pauline	Thomas-Dale, Sandra
thomasson, tabitha	Thomborson, Barbara	Thometz, David	Thompson, Amber	Thompson, Carol	Thompson, Carrie
Thompson, Chris	Thompson, Cyndi	Thompson, Don	Thompson, Eileen	Thompson, Gail	Thompson, James & April
Thompson, Janice	Thompson, Keith	Thompson, Laurie	Thompson, Lynn	Thompson, Malaika	Thompson, Margaret
Thompson, Matthew	thompson, Ms. susan C	Thompson, Robert	Thompson, Robert	Thompson, S	Thompson, Sally
Thompson, Sandra	thompson, shawn	Thompson, Steve	Thompson, T J	Thompson-Tucker, Alysa	Thomsen, Don
Thomson, Chris	Thomson, H	Thomson, Laurence	Thomson, Robert	Thomson, Wil	Thon, Neil
Thorbjornsen, Brian	thorn, debbie	Thornberry, Myron	Thornburg, Sara	Thornburn, Cathy	Thorne, Lisa
thorne, Ms Jan thorne	Thornell, Nigel	Thornsbury, Jean	Thornton, Deborah	Thornton, J. Fred	Thornton, J. Fred
Thornton, Linda	Thornton, Mary	Thornton, Patricia	Thornton, Ruth	Thornton, Shamus	Thorsson, Leanne
Throop, Sharon	Thrush, Daniel	Thryft, Ann	THU, Mr. ERIC	Thurairatnam, Mrs. Susan	Thureson, Anne
Thurman, Anna	Thurn, Clement	tibbets, linda	Tice, Janet	Tichman, Nadya	Tichy, Cara
Tichy, Robert	Ticknor, Matilda	Tico, Wendy	Tidwell, Ms. Amber	Tidwell, Ms. Marion	Tiefer, Hillary
Tierce, Kyle	Tierney, Robin	Tieso, Jovita	Tiessen, Diana	Tietjen, Jamie	Tilander, John
Tilborgh, Tony	Tilden, Donna	Tildes, Ms. Katherine	Tilds, Laura	Tillery, Bruce	Tilles, Leslie
Tilley, Angi	Tilley, Rose	Tillinghast, Audrey	Tillman, Heather	Tillman, Heather	Tillman, Henry
Tillman, P	Tillman, Princess	Timberlake, Ralph	Timlin, Teresa	timmerman, margaret	Timmons, Rod
Timnev, Candiann	Tindall, Travis	Tine', Tina	Tinker, Cathy	Tinsley, Brenna	Tippens, R
Tippens, R	Tirelli, Cristina	Tirone, Deb	Tischhauser, John	Tisdell, Jennifer	Tiseo, Troya
Tiship, Victor	Tissot, John	Titmuss, Abigail	Titone, Theresa	Tivol, David	Tizard, Thomas
Tlustos, Margaret	Tobatayeva, Aliya	Tobe, Jerry	Tobias, Alice	Tobias, Alice	Tobin, Leo
Tobin, Ralph	Tobing, Mika	Tobler, András	Todd, A.	Todd, Allen	Todd, Ann-Marie
Todd, Kalita	Todd, Michael	todd, nic	Todd, Zachary	Todnem, David	Todras, Ellen
Toelkes, Travis	Toister, Jan	Tokarczyk, Janine	Tokarczyk, John	Tokuda, Tlaloc	Tolar, Siobahn
Tolf, Francine	Tollefson/Conard, Margot	Tollner, Elise A	Tollner, Elise A	Tomajko, Debra	Tomalty, Dr Nansea
Tomaro, James	Tomaschik, Kathryn	Tomaselli, Paul	Tomasello, Pela	Tomazic, Michael	Tomczuk, Agnes
Tomczyszyn, Mr. Michael	Tome, Paula	Tomes, Hannah	Tomlin, Debbie	Tomlin, Greg	Tomlinson, Nancy
Tompetrini, Phil	tomsky, andy	Tonegawa, Kathy	TONET, Monique	Tong, Kevin	Tong, Kevin
Tong, Scott	Tonhazy, Frank	Tonnesen, Linda	Ton-Olshaskie, Thi	Tooke, James	Tooley, Ruth
Toop, Robert	Toor, Francine	toor, manmeet	Topazio, Alicia	Topp, Jamie	torboli, roberto
Torell, Erica	Torgesen, Lorraine	Torgeson, James A.	Torlone, Gary	Torma, Jane	Tormos, Winston
Tornabene, Michele	Tornatore, Marianne	Torok, Joan	Torres, Gamaliel	Torres, M Lorraine	Torretta, Ron
Torrey, Kristin	Torrice, joe	Torrisi, Jaimee	Torrisi, Sharon	Torsander, Camilla	Torti, Carla
Tosiello, Josephine and Frank	Toste, Jeff	Toth, Jennifer	Totillo, Jonathan	Totten, Harold	Tountas, Barbara
Tourneur, Jean-Charles	Tousana, Dennis	Toussaint, Christopher	Tovar, Marla	Tovar, Marla	towell, sarah

Towle, Denise	Towler, Isobel	Towner, Erline	Townill, Linda	Townsend, Dr. Darlene	Townsend, Sarah
Towry, Paula	Toy, Mary Ann	Toy, Zena	Tozzi, Lauren	Tozzi, Sharon	Traber, Lucy
Tracy, Crystal	Tracz, Kristin	Trafon, Heather	Trainer, Amy	Tramel, Sophie	Trampleasure, Calvin
Tran, Danielle	Tran, Danielle	Tran, Dat	Tran, Sheila	Tranel, Jeanne	Trask, David
Traub, Gerard	Traudt, Jeanette	Trauger, Adam	Traum, Norman	Traum, Sandra	Trauth, Beti
Trautmann, Eugene	Trautvetter, Myrna	Travaline, Patricia	Travers, David	Travis, Barb	Travis, Edwin
Travis, Terry	Traweek, Jim	Trawick, Elsie	Traxel, Walter	traxler, matt	Traynor, Mike
Treadway, Linda	Treadway, Ms. Carolyn	Treat, Lynne	Treffry, Nancy	Tregidgo, Richard	Trei, PK
Treichler, Glenn	Treleaven, Debi	Tremblay, Jake	Tremblay, Mike	Trembulak, James	Trembulak, James
Tremmel, Diane	Trenier, Bea	Trepal, Cathy	Treppeda, Cassandra	Trescone, Thomas	Treuil, Marilyn
Trevallee, Steven	Trevor, Carol	Triana, Antonio	triassi, susan	Tribble, Alleena	Trifu-New, Florina
Triggs, Lori	trimm, jeremy	Trimm, Katherine	Tringali, Al	Trinka, Charles	Trinkle, Heidi
Trione, David	Triplett, Bruce and Penny	Triplett, William	Tripp, Frederick	Trivedi, Pramod Kumar	Trivisonno, Susan
Troise, Ann	Troland, Mary	Troll, Laura	Tronco, Carl	Tropiano, Emilie	Trosper, Michelle
Trott, Nat	Trowbridge, Andrew	Trower, Steven	Trowsdale, Gavin	Troxell, Patricia	Troyanovich, Steve
Truax, Brian	Trudeau, Stephanie	trudell, kathleen	TRUE, Angela	Trufan, Hal	Trujillo, Severita
Trujillo, Stephanie	Trunk, Christine	Truppe, Eric	Trusky, Anna	Truyens, Ann	Tryggeseth, Ms Jackie L
Trykowski, Denay	Trykowski, Denay	Tsang, Tony	Tsantilis, Senta	Tseng, Laura	Tsh, Frank
Tsiominas, Jamie	Tsitsivas, Laurie	Tsomo, Karma Lekshe	Tuason, Henry	tuch, christopher	Tucker, Ann
Tucker, Brent	Tucker, K.	Tucker, Karen	Tucker, Larry	Tucker, Michele	Tucker, Mr. David
Tucker, Ms. Meredith C	Tucker, Nicoli	Tucker, Robert	Tucker, Valerie	Tudor, Geoffrey	Tudor, Ruth
Tudor, Ruth	Tudor, Ruth	Tuesday, Allie	Tuff, Paul	Tufnell, Alexandra	Tugadi, Denise
Tugwell, Ms. Kathleen	Tuke, Ms. Carla	Tullis, Ercil D	Tulman, Maria	Tulo, Mrs. Jennifer	Tulys, Walter
Tumarkin, Alexandra	Tupper, Thomas	Turanyi, John	Turbeville, Sara	Turetsky, Sami	Turgeon, Valerie
Turicchi, Kelly	Turk, Linda	Turmaine, Kathleen	Turner, Barbara	Turner, Bobbie	Turner, Brittany
Turner, Carolyn	Turner, Geo	Turner, Glenyth	Turner, Jamie	Turner, Jeanetta	Turner, Jennifer
Turner, Jo	Turner, Judith	Turner, Judy	Turner, Kathleen	Turner, Kevin	Turner, Margaret
Turner, Mary	Turner, Merrylees	turner, mike	Turner, Paul	Turner, Phyllis	Turner, Randall
turner, rose	turner, rose	Turner, Steve	Turner, Tammi	Turner, Wayne	Turnquist, Debra
Turrubiate, K	Tussing, Katharine	Tuteur, Mary	Tutihasi, R-Laurraine	TUTTEROW, RANDALL	Tutterrow, Victoria
Tuttle, Robert	Tvedt, David	Twaddell, Cheryl	Twombly, Glen A	Tyler, Wesley	Tylo, Terri
Tymkiw, Liz	Tyndall, Lucy	Tyree II, James	Tyrie, Elaine	Tyron, Erica	Tyrrell, Larry
tyson, heather	Tyson, Kathleen	Tyson, Keith	Tyszkiewicz, Beata	U, Christine	Udelson, D.
Udovich, Adam	Udvardi, Abram	Udvardi, Kirk	Udvardi, Leslie	Udvardi, Matthew	Udvardi, Samuel
Ugolik, Lori	Ujpetery, Sandra	Ulibarri, David	Ulring, Karen	Ulsberg, Asbjørn	Underdown, Eleanor
Underwood, Carol	Ungar, Ruth	Ungaro, Francine	Ungeheier, Betsy	Unger, Charles	Unger, Mr. Sam
Unger, Ron	Unger, Wanda	Unirer, Artur	Unirer, Artur	Unrau, Jo.	Unruh, Alexa
Uppena, JoAnn	Uppgaard, Heidi	Upshaw, Trycenia	Urban, Donna	Urban, Harold	Urbanovich, Mary
Urias, Victoria	Urich, David	Urla, Joseph	Urquhart, Steven	Urscheler, Patrizia	Urso, Massimiliano
Urton, S.	Usechak, Louise	Ushman, Lisa	Utt, Virginia	Utz, Holly	Utzman, A.
Uzych, Leo	V, K	V, L	V., Steve	V., V.	Vaara, Julia
Vaccaro, Lori	Vaccaro, Terry	Vacek, Radko	Vachon, Adelia And Phillip	Vachula, Elizabeth	Vadopalas, Erika
Vaessen, Peter	Vainio, Heidi	Vairo, Gina	Vajda, Debby	Vakili, Mehdie	Valade, Sara
Valaika, William C.	Valanki, Jussi	Valastro, Cecile	Valdez, Adela G	Valdez, Adela G	Valdez, Adela G
Valdez, amy	Valdez, Debra	valdez, ruth	valdez, ruth	Vale, Katherine	Valencia, Mary
Valencia, Rio	Valenta, Carol	Valente, Barbara	Valenti, Brian	Valentine, Jennifer	Valentine, Sarah
Valentini, Ms. Karen	Valero, Maudie	Valès, Audrey	Vallejo, Carol	Vallejos, James	Valys, Stephanie

Valzania, Elaina	Van Allen, Steve	Van Alyne, Emily	Van Arsdale, Duncan	Van Auken, Matthew	Van Bruggen, Alie
Van Camp, Barbara	van de Water, Cor	Van Deusen, Charles	van Druten, Gale	Van Dusen, Jan	Van Dyk, Margaret
Van Farowe, Vonda	Van Gerven, Claudia	Van Gundy, Lauren	Van Heugten, Marco	Van Horn, Donna	Van Horn, John
van lear, tom	Van Rooyen, Barbara	van Rosse, Sylva	van sant, sandy	van Sas, Sicco	Van Sickle, Krae
van Son, Mary	Van Stedum, Bonnie	van Tol, Gerard	van Tol, Maud	van Trotsenburg, Harry	Van Walsen, Barbara
VanAusdle, Terri	VanBerkom, Margie	Vance, Ms. Patricia	Vance, Samuel L.	Vance, Sarah-Jean	VandeGriff, Bobbie
VandeGrift, Julia	Vandenburgh, Rita	Vanderbosch, Maureen	VanderHeyden, Memoree	Vanderhill, Margo	Vandermeer, Denise
Vanderslice, Tiffany	Vanderslice, Tiffany	Vanderweele, Alex	VanDerzee, Susan	VanDerzee-Glidden, Kate	VanDeVeire, Carol
Vandiver, Diane	Vandrovec, Cathy	Vandyck, Tom	VanEnglehoven, Lois	VanEnkevort, Shari	VanEtten, Margot
Vaniman, Jill	Vann, Laurie	Vanne, Lynne	VanNoord, Lora	VanNostrand, Montie	VanOosting, Kathryn
Vanpelt, Sandy	vanWert, Jane	VanWinkle, Miss Jean Marie	VanZant, Michael	Varanitsa, Oleg	Varas, Carlos
Varellas, Dorothy	varga, carolina	Varga, Dolores	Varga, John	Vargas, Aymara	Vargas, Carlos
Vargas, Gabriela	Varjord, Stein	Varnon, Dee	Varnum, Jane	Vartenuk, Cynthia	vartoogian, linda
Varvel, Sandra	Vasil, Alyse	Vasilia, Geri	Vasily, Karen	Vasquez-Chong, Marco	Vassilakidis, Sophia
Vatousiou, Mark	Vaughan, Bob	Vaughan, Lisa	Vaughn, Amy	Vaughn, Christie	Vaught, Kevin
Vaughter, Ellie	Vaughters, Lucy	Vaupel, Ilona	Vavrek, Ayesha	Vavrek, Jean	vayu, satya
Vaz, Joe	Vazquez, Louis	Veach, Elizabeth	Veach, Elizabeth	Vearling, June	Vecchiotti, Dorothea
Veden, Leonard	Veenstra, David	Vega, Alejandra	Vega, Bonika	Vega, Nelly	Veino, Tara
Veitenheimer, Jennifer	Veium, Alicia	Velarde, Mario	Velasco, Gigi	Velasquez, Doreen	Velasquez, Frank
Velazquez, Shannon	Vele, Mick	Velez, Damian	Velez, Damian	Velez, Francisco J.	velez, marcos
Velky, Natalia	Vella, Kent	Vella, Mr. Joseph	Veloo, Uma	Veloo, Uma	Veltrop, Marilyn
Velvet, Lacey	Vembu, Tulsi	Venables, Lily	Venar, Jennifer	Venesky, Anna	Vennerholm, Susan
Venos, Mary Helen	Ventre, Bill	Venzke, S	Vera, Elisheba	VERA, ZAIRA	VERA, ZAIRA
Veragten, Anja	veraldi, Ms. anne	verboven, alex	Verbridge, Tara	Verde, Rachel	Verdecchia, Angela
Vergara, Don	Vergara, Karen	Vergidis, Dinos	VerKamp, Lizabeth	Verlinde, Nancy	Vermeulen, Ingrid
Vermeulen, Mr. Doug	Vermillion, John	Vernon, Margaret	Vernon-Jones, Amy	Veronda, Ronald	Verrill, Evelyn
Versenyi, Adam	verstichelen, veronique	Vervena, Lisa	Verzosa, Paul	Vescio, Pat	Vesey, Robin
Vesper, Barbara	Vessicchio, Anthony P.	Vessicchio, Susan P.	vestias, eusebio manuel vestias pecurto	vestias, eusebio manuel vestias pecurto	vestias, eusebio manuel vestias pecurto
Vetek, Suzanne	Vetrie, Julia	Vetter, Donna	Veyhl, Stanley	Vezian, Marc	Viacrucis, John
Vicento, Robert	Vichiola, Christopher	Vickerman, Linda	Vickers, Emily	Vickstrom, William	Victor, Ms Betty
Viergutz, Julie	Vieth, Janice	Vigen, Aana	Vignapiano, Gregory	Vij, Sarita	Vilches, Paul
Vilhena, Linda	Vilimek, Linda	Villa, Linda	Villaggio, Carol	Villanova, Carolyn	Villante, Cheryl A.
Villarreal, Ronald	Villella, John	Villwock, Gordon	Vilter, Lance	vince, james	Vincent, Laurel
Viner, David	Viney, James	Vining, Jennifer	Vinson, Marcia	Vinyeta, Kirsten	Violante, Michael
Virgilio, Karen	Virr, Laurie	Virtanen, Risto	Visioli, Lori	Vital, Sybille	Vitale, Elizabeth
Vitek, Kathryn	Vittles, Anne	Vivit, Mary	VL, Judie	Vlasiadis, Andreas	Voegele, Vera
Voelker, Betty	Voelker, Thomas	Vogel, Anita	Vogel, Hartmut	Vogel, Nathan	Vogelsong, Patrick
Vogt, Axel	Vogt, Chrysanne	Vohwinkle, William C.	voitzuk, pablo	Völk, Bernhard	Volk, Robert
Volk, Suzanne M.	Volkov, Kalila	Vollbrecht, Judith	Vollmer, Terry	Volpe, Beatrice	Volz, Candace
Vom Weg, Bill	von Borg, MSW, MPH, Annee	von Eiff, Ted	von Giebel, Robert G	Von Glan, Lucas	von Hoffmann, Mari
von Kampen, Michele	Von Raven, Billy	Von Tress, Kay	Von Weidlich, Allyce Dowling	Vonderschmidt, Don	VonNeeda, Patricia
Voorhees, Jan	Voorhies, Eric	Voorhies, William Voorhies	Vorachek, Mary	Vorstermans, Matthew	Voss, Cassandra

Voter, Citizen	Voth III, Mr. Theodore	Vought, Daniel	Vought, Jon	Voves, Deborah	Voyles, Tamara
Voytas, Paul	Vrabel, Karrie	Vrba, Tracy	Vrbanic, Adam	Vries, Dr. M.	Vukovich, Chelsea
Vulcano, Jaacqeu	Vyatchanin, Arkady	Vyatchanin, Evgenia	Vyhnal, Kristin	W, A	w, b
W, Byron	W, Dan	W, Jennifer	W, M	W, Mary	W, Mary
W, Mr. M	W, Rosemary	W, T	Wachs, Karaen	Wachtmeester, G.j.	Waddell, Kendra
Wade, Carl	Wade, Dan	Wade, Julia	Wade, Kimberly	Wadell, James	Wadsworth, John
Wagenheim, Mr. Allan	Wager, r	Waggener, Carol	Wagman, Barnet	Wagner, Adam	Wagner, Art
Wagner, Carol	Wagner, Gordon	Wagner, John	Wagner, Louis	Wagner, Mr. Jim and Virginia	Wagner, Ms. Elissa
Wagner, Pat	Wagner, Phil	Wagner, Rayleen	Wagner, Robin	Wagner, Sally	Wagner, Vickie
Wagner-McPherson, Caryn	Wagtmann, Maria Anne	Wahl, Tom	Wahrman, Mathew	Waite, Elizabeth	Waite, Janet
Wakerley, Norm	Waksler, Frances	Waksman, Barbara	Walberg, Jeriene	Wald, Aloysius	Walden, Jeff
Walden, Stephanie	Waldman, Annamay	Waldmann, Stephen	Waldo, Jody	Waldron, Denise	Waldron, Elizabeth
Waldron, Matthew	Wald-Tuttle, Anita	Walker, Andrew	Walker, Beth	Walker, Brad	Walker, Carol
Walker, Carol	Walker, Charlotte	Walker, David	Walker, Elena	Walker, Jason	Walker, Joan
Walker, Judy	Walker, Kimberly	Walker, Lawrence	Walker, Linda	Walker, Lindsey	Walker, Margaret
Walker, Mariaq	Walker, Marie	Walker, Mary	Walker, Russell	Walker, Sheryl	Walker, Tara
Walker, Terry	Walker, Thomas	Walkins, Jami	Wall, Jason	Wall, Joy	Wall, Kathy
Wall, Teresa	Wall, Thomas	Wallace, Bruce	Wallace, David	Wallace, Donald	Wallace, Lizabeth Murphy
Wallace, Robert	Wallace, Stephen	Wallace, Susan	Wallace-Nelson, Nancy	Wallaert, Karen	Waller, Max
Wallesz, Barbara	Walley, Janet	WALLOF, HUNTER	Walls, JoAnne	Walmsley, Catherine	Walp, Susan
Walrath, Isaac	Walseth, David	Walsh, Cheryl	Walsh, Deborah	walsh, deborah	Walsh, Dr. Steve
Walsh, Frances	Walsh, Maria	Walsh, Martin	Walsh, Pete	Walsh, Tom	Waltasti, Mrs. Marilyn
Walter, Gail	Walter, Ms. Kimberly	Walter, Vivian	Waltermire, Erik	Walters, Betty	Walters, Denise
Walters, Ernie	Walters, Jennifer	Walters, Kari	Walters, Robyn S	Walters, Ronald	Walther, Carolina
Waltman, Martha	Walton, Christine	Walton, Gail	Walton, John	Walton, Kathe	Walton, Marcia
Walton, Mrs. Stephanie	Walton, Mrs. Stephanie	Walton, Tarla	Waltuch, Debbie	Walz, Tyler	Wan, Sara
Wanak, Angela	Wanderman, Miriam	Wang, Flora	Wang, Li-hsia	Wang, Tracy	Waniski, Rachel
Wanner, L. Shepherd	Wanninger, Steve	Ward Jr., Tedd	Ward, Albert	Ward, David	Ward, Everett
Ward, James	ward, Jeffrey	Ward, Joanna	Ward, Joe	Ward, Ken	Ward, M
Ward, Martin	Ward, Martin	ward, pam	Ward, Peter	Ward, Sheila	Ward, Stacey A. A
Ward, Susan	WARD, TERRENCE J	Wardell, Kate	Warden, Kayla	Warden, Lew M.	Warden, Ms. Patricia
Wardlaw, Jessica	Ware, Christopher	Ware, Debra	Warhol, Tom	Warming, Patricia	Warner, Carole
Warner, Lauren	Warner, Ms. Chezna	Warren, Christine	Warren, Craig	Warren, Karen	Warren, L
Warren, Megan	Warren, Sean	Warren, Vic	Warrender, David	Warrick, Julie	Warrillow, Jennifer
Warrilow, Jo-Anne	Warriner, Ellizabeth (Betsy)	Warshawski, Sharon	Warwick, Frederick	Warwick, Graham	Warwick, Miriam
Wasala, Sherry	Wasfi, Ellen O	Wasgatt, Ann	Washburn, Morning	Washington, Kathy	Washington, Ms. Chris
Washington, Susan	Wasielewski, Alison	Wasner, Joanne	Wasser, Corinne	Wasser, Ellie	Wasser, Nancy
Wasserman, Joseph	watada, tracy	Watchempino, L.	Watene, Veronica	Waters, Alexander	Waters, Ms. Elaine
Waterson, Daniel	Waterworth, Mrs. P. D.	Watilo, Bobbie	Watkins, Jim	Watkins, Kevin	Watkins, Stefanie
Watson, Aleena	Watson, Angela	Watson, Benvineto	Watson, Bonnie	Watson, Brad	Watson, Colin
Watson, Debra L.	Watson, Dee	Watson, Donna	Watson, Harold	Watson, Jeffrey	Watson, John
Watson, Mrs. Carol Knight	Watson, Pamela	Watson, Patricia	Watson, Patrick	Watson, Suzanne	Watson, Virginia

Watt, Celeste	Watt, John	watters, cheryl	Watters, Diane	Watters, Whitney	Watts, Martin
Watts, Mrs. Susan	Watts, Rachel	Watwood, Alan	Waumsley, Samuel	Way, Annette	Way, Karen
Wayne, Randall	Wayne, Susan	WAYTE, MARILYN	Weage, Robin	Wear, James	Weate, John
Weatherly, Carrie	Weaver, Andrew	Weaver, Charlie	Weaver, Clare	Weaver, Clare	Weaver, Esther
Weaver, George	Weaver, Janice	Weaver, Judy	Weaver, Matthew A.	Weaver, Michael	Weaver, Michael
Weaver, Mrs. Kathleen	Webb, Alice	Webb, Charles	Webb, Eada	Webb, Joan	Webb, Kathleen
Webb, Michelle	Webb, Mr. Randall	Webb, Vince	Webber, Greg	Weber, Ellie	Weber, Ellie
weber, jan	Weber, L	Weber, Lilian	Weber, Mrs. Bonnie	Weber, Nicole	Weber, Ron
Weber, Terry	Webster, Marybeth	Webster, Robert	wechselblatt, marylin	Wechsler, Susan	Weckman, Shannon
Weddle, Stetson	Wedow, Nancy	Weedston, Lindsey	Weekes, Karin	Weekley, Sarah	Weeks, Carey
Weeks, Dixie	Weeks, Janice	Weeks, Linda	Wehr, Jordan	Weicher, Jeff	Weichmann, Eric
Weicker, Dorothy	Weiden, Laura	Weigand, Ron	Weil, Mr. Don	Weil, Nancy	Weil, Susanna
Weilage, Nan	Weiland, Janice	Weil-Martin, Carla	Weinberger, Deborah	Weiner, Hillary	Weiner, Linda
weiner, mary ellen	Weiner, Roberta	Weingart, Robert	Weinmann, Patricia	Weinstein, Mardy	Weinstock, Jason
Weinstock, Stuart	Weir, David	Weis, Joe	Weis, Marie	Weis, Michal	Weisend, Jeff
Weisman, Eleanor	WEISMAN, LAM	Weiss, Karen	Weiss, Laura	Weiss, Lizette	Weiss, Marjorie
Weiss, Ms. Arleen	Weiss, Norman	Weiss, Paul	weiss, stuart	Weissberg, Eric	Weisser, Mark
Weissglass, Roberta	Weissman, Paul	Weissmann, George	Weisz, Don	Weisz, Russell	Welch, Howard
Welch, James	Welch, Lee	welde, logan	Weldon, Richard	Weldon, Wendy	Weliky, Deirdre
Welker, James	Welkowitz, William	Wellehan, Jim	Weller, Michael	Wellin, Ruth	Wellington, Nic
Wellman, charles	Wells, Anne	Wells, Genevera	Wells, Holly	Wells, Jameson	Wells, Jeff
Wells, Joann	Wells, Lasha	Wells, Suzanne	Welsh, Caitlin	Welty, Fred	Welz, Frank
Wenberg, Larry	Wendel, Tom	Wender, Taran	Wendt, Marilyn	Wensing, Thomas	Wentland, Tyler
Wenzel, Joseph	Wenzel, Kristen	Wenzel, Scott	Wenzel, Tom	Wenzer, Ken	Wenzlaff, Carla
Werner, Elaine	Werner, Ingrid	Werner, Jennifer	Werner, Joan	Werner, Judith	Werry, Richard
Werstein, Paul	Wesche, Justin	Wesemann, Bill	Wesley, F. Robert	Wesley, Immaculate	Wesley, Sheryl
Wesling, Heather	Wess, Rlaf Arno	Wessman, Eric	West, Alan	West, Alan	West, Alice
West, Angela	West, Diane	West, Eric	West, Florence	West, Geoff	West, Jeffrey
West, Jennifer	West, John	west, Lisette	West, Meredith	West, Ms. Sara	West, Paul
West, Rusty	West, Sara	West, Sherri	Westad, Kim	West-Hooper, Gail	Westring, Mary
wettlaufer, paul	Wetzel, Glen	Weyand, Julie	Weyer, Diane	Weyhrich, Patty	Whalen, Patricia
Whalen, Patrick	Whall-Marlin, Denise	Wharton, Becky	Wharton, Jerry	Wharton, Leslie	Wheat, Maryjane
Wheaton, Joyce	Wheaton, Preston	Wheeland, Allen	Wheeler, Carla	Wheeler, Frank	Wheeler, Jennifer
Wheeler, Ken	Wheeler, Laura	Wheeler, Mary	Wheeler, Mike	Wheeler, Mr Bruce	Wheeler, S
Wherren, Daniel	Wheys, Tom	Whillock, Laurel	Whiltey, Jason	Whipple, Mr. Wyman	Whisenhunt, Rodney
Whitacre, Paul	Whitaker, Howard J	Whitaker, Ms. Shirley	Whitaker, William	White, Beulah	White, Bruce
wHITE, Bruce	White, Callie	White, Chenoa	White, Denise	White, E.	White, Edward A
White, Faith	White, Guy	White, Helen	White, James	White, Jean	White, John
White, Joseph	White, Jusef	White, Kim	White, Landra	White, Lois	White, Marilea
White, Mark	White, Mary	White, Michael	White, Mindi	White, Mr. Earl Ivan	White, Ms. Cay
White, Ms. Danielle	White, Nancy	White, Paul	White, Rachel	White, Rebecca	White, Sharlene
White, Susan	White, Terryl Cluney	White, William	White, William P.	Whitehouse, Jill	Whitehouse, Judy
Whitehurst, Carol	Whitehurst, Karma	Whitener-Smith, Hunter	Whitesell, Lane	Whiteside, Catherine	Whiteside, Jane
Whitfield, Poulette	Whitford, Ann	Whitham, DrMéd, DrMédVét, MPH, Raymond	Whiting, Nancy	Whitley, Linda	Whitley, Piers
Whitley, Shonna	Whitlock, Liam	Whitlow, Christine	Whitman, Adam	Whitman, Judy	Whitman, Rick
Whitmore, Daniel	Whitmore, Dorothy	Whitmore, Robert	Whitney, Desiree	Whitson, Helene	whittaker, cheryl

Whitten, Darice	whynott, gregory	Whysong, Kelly	Wickell, Allen	wickline, diane	wickwire, mary
Wider, Stephen	Wider, Stephen	Wiederhold, Joe	Wieland, Chuck	Wien, Alison	Wiener, Mary
Wienert, John	Wienk, Marilyn	Wiens, Nancy	Wier, Jody	Wiese, Steven	Wiesler, David
Wiesner, Amy	Wiesner, Dr. John	Wiesner, Joseph	Wiesner, Judith	Wiest, Jennifer	Wiest, Jo
Wigfield, Susan	Wiggin, Deborah	Wightman, Kelly	Wightman, Richard	Wijkhuizen, Jaline	wilber, heather
Wilbur, Liz	Wilbur, Lynn	Wilbur, Margaret	Wilcox, C.	Wilcox, C.	Wilcox, James
wilcox, sandra	Wilcox, Sheila	Wild, Donna	Wild, Michael	Wilde, Sean	Wildensee, Kristin
Wilder, Dwain	Wilder, Flo	Wilder, Laura	Wildman, Charlotte	Wiles, Kristin	Wiles, Linda
Wiley, Carol	Wiley, Carol	Wiley, David	Wiley, Jane	Wiley, Kimberly	Wiley, Ms. Ann
Wiley, Patricia	Wilhelm, George	wiliamson, scott	Wilk, Jonathan	Wilke, Gail	Wilke, Susan
Wilken, Jane	Wilkerson, Brian	Wilkerson, Ryan	Wilkie, Susan	Wilkins, Jaci	Wilkins, Rebecca
Wilkinson, Cliff	Wilkinson, Colleen	Wilkinson, Dorothy	Wilkinson, Harold	Wilkinson, L. L.	Wilkinson, Sam
Wilkinson-Bacchi, Susan	Wilks, Andrew	Will, Mary	Willard, Dennis	Willard, Ken	Willens, Sheila
Willet, Zoe	Willets, Laurie	Willett, Greg	Williams, Alek	Williams, Alice	Williams, Alice
Williams, Brandon	Williams, Carla	Williams, Carol	Williams, Caroline	Williams, Catherine	Williams, Christopher
Williams, Clarisa	Williams, Cynthia	Williams, Dan	williams, daniel	Williams, David	Williams, Dianne
Williams, Douglas	Williams, Felicia	williams, freddie	Williams, George	Williams, Helen	Williams, Helen Jo
Williams, Hilda	Williams, James	Williams, Jim and Alison	williams, john	Williams, Joselyn	Williams, Kenneth
Williams, Kyenne	Williams, Kyle	williams, lee	Williams, Lena	Williams, Margery	Williams, Marjorie
Williams, Mike	Williams, Mr. Jesse	Williams, Mr. Joseph and Diane	Williams, Mr. Stephen L.	Williams, Nalan	Williams, Patty
Williams, Penelope	Williams, Richard	Williams, Richard	Williams, Roger	Williams, Roger	Williams, Roosevelt
Williams, Roxanne	Williams, S. E.	Williams, Sabine	Williams, Sandra	Williams, Sara	Williams, Sunny
Williams, Victoria	Williams, Weldon	Williamson, Catherine	Williamson, JC	Williamson, Jim	Williamson, Joan
Williamson, Joan	WILLIAMSON, JUDITH	Williamson, Kathryn	Willis, Callie	Willis, Cheri	Willis, Friend
Willis, Joanne	Willis, Russell	Willis, William	Willitts, Terrence	Willner, Daniel	Willoughby, Ms. Emily
Willour, Ms. Judith	Willroth, Alana	Wilmes, Norm	Wilmot, Beth	Wilmoth, Charles	Wilmsen, Sherry
Wilsnack, Jonathan	Wilson, A	Wilson, Albert	Wilson, Amy	Wilson, Arthur	Wilson, Barbara
wilson, bea	Wilson, Brian	Wilson, Clave	Wilson, Dana	Wilson, Darryl	Wilson, Dave
Wilson, David	Wilson, David	Wilson, Dianne	Wilson, Donald	Wilson, Elaina	Wilson, Holly
Wilson, Hope	Wilson, Jane	Wilson, Jason	Wilson, Karen	Wilson, Katherine	Wilson, Keegan
Wilson, Kerri	Wilson, Lena	Wilson, Lois	Wilson, Marjorie	Wilson, Martha M.	Wilson, Mary
Wilson, Meghan	Wilson, Molly	Wilson, Nathan	Wilson, Patricia	Wilson, Pete	Wilson, Philip
Wilson, Phillip	wilson, richard	Wilson, Robert	Wilson, Sandra	Wilson, Sandra F	Wilson, Sharon
Wilson, Stephen	Wilson, Steve	Wilson, Tim	Wilson, Tina	Wilson, Tish	Wilson, W Kent
Wiltsie, Donald	Wimberly, H	Wimer, Mary Catherine	Wimmer, Benjamin	Wimpy, Shryl Kidd	Winant, Dorcey
Winchester, Stewart	Windberg, Ernest	Windeknecht, Patti	Winder, K. L.	Windrum, Ken	Windweh, Karola
wine, judith	wine, judith	Wines, Joshua	Winfrey, Bobbiejo	Wingenbach, Liana	Winger, Andy
Winget, Mike	winholtz, betty	Winkel, David	winkelmann, helen	Winkler, David	Winn, Debora
winnick, joie	Winnicki, Kristine	Winsberg, Julie	Winstanley, William	Winstead, Annie	Winstead, Cody
Winsten, Martha	Winter, Jolene	Winterer, Katrin	Winterling, Theresa	Winters, Drusilla	winters-brown, Emily
Wiora, Denise	Wire, M	Wirth, Mark	Wirth, Mr. Charles	Wirth, Mr. Charles	Wisch, Anita
Wisch, Anita	Wisdom, Kim	Wisdom, Lee	Wise, Charles	Wise, David	Wise, Eileen
Wise, Niki	Wiseley, John	Wishinski, Susan	Wissick, Eugene	Wissinger, Julie	Witham, Lily
Witham, Lisa	Withem, Barbara	Withers-Julian, Dixon	Withnall, Emily	Witkus, Karen	Witmer, Tiffany
Witt, Stephen	Wittenborn, Andrew & Kathleen	Wittern, Dennis	Wittmer, Jamie	Wittner, Judith	Wobus, Dr. Elizabeth
Wodynski, Barbara	Woelzl, Susan	Woerner, David	wohlberg, keith	Wohlford, James	Wohlsein, Harry
Woitkoski, Andrew	Wojciakowski, Chelsa	Wojno, Sharon	Wojtalik, Mr. Alan J	Wojtalik, Nikki	Wojtowicz, Rurh

Wolak, Abigaile	Wolf, A.	Wolf, Bob	Wolf, Christopher	Wolf, Crystal	Wolf, Darlene
Wolf, Deborah	Wolf, Elisabeth	Wolf, Greg	Wolf, Karen	wolf, Lois	Wolf, Mary
Wolf, Mary	Wolf, Ms. Pauline	Wolf, Ms. Pauline	Wolf, Ms. Rachel	Wolf, Nate	Wolf, Roger Crazy
Wolfe, Jay	Wolfe, Jon-Paul	Wolfe, Laura	Wolfe, Michael	Wolfe, Mrs. Mary R.	Wolfe, Ms. Kathleen
Wolfe, Robert	Wolfe, Stacey	Wolff, Allison	wolff, jay	Wolff, Pat	Wolfgang, Mara
Wolfskill, Dara	Wolfsohn, Edward	Wolfsohn, Edward	Wolfson, Adam	Wolinsky, Susan	Wolk, Sam
Woller, Dakotah	wolman, carol	Wolock, Rosemary	wolsak, lissa	Wolzen, Roxane	Womack, Jon
Wonder, Dorothy	Wong, Arthur	Wong, Debi	Wong, Manny	Wong, Sharon	Wontor, Debra
wood, amanda	Wood, Ann	wood, ann	Wood, Betsy	Wood, Christopher	Wood, Claudia
Wood, Cornett	Wood, Dale	Wood, David	Wood, Dianna	Wood, Don	Wood, Heidi
Wood, Homer	Wood, John and Polly	Wood, Joyce	Wood, Judy	wood, kate	Wood, Kathy
Wood, Lilia	Wood, Lorrie	Wood, Margaret	Wood, Margo	Wood, Marta	Wood, Mary
Wood, Mr. Gordon	Wood, Pam	Wood, Phillip	wood, rose	Wood, Shelva	Wood, Sue
Wood, Suzanne	Wood, Timothy	Wood, Timothy	WOODARD, Mr. BENNIE	Woodbury, Randall	Woodbury, Ross
Woodcock, Ruth	woodhull, J	Woodley, Wes	Woodruff, Carol	Woodruff, LK	Woodruff, Rose
Woods, Amanda	Woods, Cheri	Woods, Janus	woods, michael	Woods, Rev Rachelle	Woods, Robert
Woodward, Ellis	Woodward, Nancy	Woodward, William	Woody, Clay	Woodyard, Rosemary	Wooldridge, Suzanne
Woolford, Ronald	Woollcombe, Jessica	Woolsey, Carri	Wooten, Mara	Wootten, Ruth	Worcester, Alison
Worcester, Mr. Chris	Word, Vicki	Workman, Tom	Works, George	Wormser, Maisie	Wornum, Claudia
Worotikan, George	Worrell, M. S.	Worsham, Nancy	Wortel, Katy	Worth, Fred	Worth, G.
Worth, Shane	Worth, Wendy	Worthing, Allan	Worthington, James	Wostenberg, Darren	Wozniak, Ann Mulholland
wrage, william	Wraight, Sandy	Wreford, Julie	Wrigh, Georgina	Wright III, Trigg	Wright, Armin
Wright, Brian	Wright, Catherine	Wright, Chadwick	Wright, Don	Wright, Emma	Wright, Gail
Wright, Gary	Wright, Gary	Wright, Katherine	Wright, Katherine	Wright, Kathy	Wright, MD, Lara
Wright, Ms. Sydney	Wright, Norman	Wright, Samantha	Wright, Susan	Wrigley, Robert	Wrobel, Amy
Wu, Dennis	Wu, Louisa	Wuerslin, Theodore	Wuertz, Arnold & Irma	Wulfsohn, Aubrey	Wunder, Dale
Wunderlich, Eileen	Wunsch, Charlie	Wurst, Gloria	Wushensky, Sharon	Wyandt, Beth	Wyatt, Bridget
Wyatt, Cynthia	Wyeth, Judy	Wygant, Dan	Wykle, Gisela	Wyland, Deborah	Wyly, Barbara
Wyma, Luke	Wyman, Jean	Wymetal, Alexandra	Wynkoop, Lucy	Wynn, Sara	Wynn, Sheila
Wynne, Diane	Wynroth, Barbara	Wynroth, Barbara	Wyrick, Brenda	Wyse, Frank	Wyse, Margo
Wysocki, Mark	Wyss, Nicolas	xavier, marjorie	Xiberras, Miss Paula	Xo, Xo	Xo, Xo
Y., Nancy	Yabu, Carol	Yaffee, Steve	Yahm, Elinor	Yamase, Laura	Yanas, Diane
yancey, robert	Yang, Emily	Yang, Nick	Yang, Nick	Yannotti, JoAnn	Yans, Marie-Laurence
Yaremko, Zhahira	Yarger, Andrea	Yarger, Dana	Yarosevich, Joseph & Kathryn	YARTER, E C	Yarwood, Mary
Yashirin, Nick	Yaskell, Tina	Yatchak, Christopher	Yater, Jane	Yater, Joan	Yates, Alison
Yates, Cindy	Yates, Joan	Yates, Stephen	Yeager, Ayshe	Yeaman, Susan	Yee, Anthony
Yelland, Edith	Yelles, Ryan	Yellin, Shane	Yencich, Joseph A.	Yeoman, Leigh	Yeomans, Gregg
Yeomans, Helen	Yeomans, Ronald	Yépez, Wilma	Yerena Jr, Julian	Yerry, Susan	Yeung, Alexander
Yeung, Faith Meyer	Yewcic, Stephanie	Yeyna, Christopher	Yi, Teresa	Ylivainio, Joni	Yll, Judy
Yoder, Amanda	Yokoyama, Holly	Yontz, Kathleen	York, David	York, Joan	York, Lesley
York, Michele	Yost, Sally	Youd, Mark	Youd, Mark	Youd, Mark	Youd, Mark
Young, Bradley	Young, Carol	Young, Cheryl	Young, Christine	Young, Christine	YOUNG, DR. DELTON
Young, Frank	Young, Jeffery	Young, Joel	Young, John	Young, Katie	young, kyle
Young, Latika	Young, Leif	Young, Lowell	Young, Marie	Young, Merry	Young, Patricia
Young, Ria	Young, Richard	Young, Richard	Young, Ron	Young, Stan	Young, Taylor
Young, William	Youngberg, Natalie	Youngblood, Amal	Youngclaus, Elisabeth	Youngmeyer, Rebecca	Youngson, Patricia Kay

Yount, Lyn	Youritzin, Victor	Youtoodickillshootyourfaceoff, throwthebushcrimefamilyinjail	Yox, Mr. Lawrence	Yozwiak, Bernard	Yray, Quintin
Yudkovsky, Natalya	Yukl, Jennifer	Yukl, Trudy	Yule, Doug	Yun, Allen	Yungert, Barbara
Yunus, Robert	Yunusova, Gulnara	Yurchuck, Dr. Ruth	Yutsudo, Ay	Yuzawa, G	Z, Dylan
Z, Greg	Z, Veronica	Zabelin, Nina	Zaber, Kathy	Zaccagnino, David	Zacharie, Anne
Zacharie, Selwyn	Zachary, Ruth	Zachary, Thomas	Zackrone, Alex	Zadaca, Joy	Zadina, Ieva
Zagaris, Michael	Zahakos, Jim	Zahgkuni, Jennifer	Zahller, Mr. Guy	Zahnle, Kenneth	Zahos, Jonathan
Zainko, Sonia	Zajac, Andrea	Zajac, Anne	Zajec, Matea	Zakin, Laura	Zakin, Laura
Zaman-Zade, Rena	Zander, E Anna	Zander, Shannon	Zander, Suzette	zanoni, jan	Zappa, Edna
zappa, zoe	Zaricor, Dorien	Zarter, Ellen	Zastenik, Ralphjr	Zastresek, Jill	Zastrow, Sandra
Zatlin, Carole	Zattarin, Grazia	Zavez, Maryann	Zawadzki, C	Zawaski, Joan	Zazow, Jamie
Zdarsky, Barbara	Zdybel, Mario	Zech, Gisela	Zehm, Carmen	Zeibak, Jean	Zeidenberg, Naomi
Zeiser, Catherine	Zelaya, Kathy	ZELCER, BROOK	ZELCER, BROOK	Zelenak, Suzette	Zelinski, Dawn
Zeller, Michael	Zellmer, Cheryl	Zellner, Scott	Zelman, Steve	Zeman, John	Zembryki, Denise
Zenner, Alan	Zepic, Katharina	Zerbey, Suzanne	Zerzan, Paula	Zetler, Peggy	Zetley, Herb
Zettelmeyer, Sarah	Zettelmeyer, Sarah	Zhang, Jiazhu	Zhong, Carol	Zhou, Qiyuan	Ziama, Kristin
Ziarno, Raymond	Ziegler, Herbert C.	Ziegler, Jean	Ziegler, Robert	ziegler, russ	ziegler, russ
Zielinski, Sebastian	Ziesche, Mary	Ziesche, Mary	Zieser, Mary	Zillich, Ira	Zim, Larry
Zimbardi, Frank	Zimmer, Louise	Zimmer, Marilyn	Zimmer, Susan	Zimmerer, Diane	Zimmerli, Betsy
Zimmerman, Anne	Zimmerman, Jason	Zimmerman, John	Zimmerman, Patricia	Zimmerman, Paulette	Zimmerman, Susan
Zimmermann, Richard	Zimmermann, Susan	Zimpfer, Dean	Zindah, Salma	Zingg, Barbara	Zingher, Judith
Zink, Amy	Zink, Lydia	Zinkowski, Kirk	Zinn, Andrea	Zinn, Robert	Zinnecker, Debra
zINNES, HaRRIET	Zirasri, Ran	Zittrain, Mr. Jeff	Zoah-Henderson, Richard	zody, les	Zola, Doris
Zolandz, Mark	Zomer, Isabelle	Zondervan-Droz, Leslie	Zook, Douglas	zook, mary	Zook, Suzanne
Zotter, Ralph	Zovanyi, Louise	Zovich, Ynana	Zrobek, Ann	Zrust, John	zucker, marguery lee
Zuckerman, Arlene	Zuckerman, Naomi	Zuckero, Jason	Zuelow, Guenter	Zumalt, David	Zumpano, Vincenzo
Zupan, Bernadette	Zur, Jennifer	Zure, Lisa	Zure, Lisa	Zurek, Lance	Zurzolo, Arielle
Zvonik, Kaaren	Zwick, Larry	Zwicker, Marie Louise Morandi Long	Zwirtz, Debbie	Zyla, Alison	Zyla, Alison

FL12 FUSE

Comment FL12-1

The findings in the DEIS for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and the environmental damage.

Response to FL12-1

Comment acknowledged.

Table 7-19. Unique Comments Associated with FUSE Form Letter

Commenter Name	Comment
A., Nando	the ignorance of men is the enemy of mama natur why is it that the most educated people commit and allow the worst crimes against nature and humanity? men has turn earth into a painful place for all living beings...when you do wrong nothing goes unpunished Stop the war against the environment by men I blame you for being crue
Response: Comment acknowledged.	
Asmus, Sigrid	First, I am writing to you from the BNSF Blast Zone just north of downtown Seattle, where Big Oil interests plan on doubling the dozen or so trains that roll by a half-block from my house. This situation is unsafe, and it is unsustainable. Similarly, the findings in the DEISs for the Westway and Imperium oil terminal proposals
Response: Comment acknowledged.	
Bancroft, Lois	I'm just one person, retired on a fixed income. Shell Oil is not on a Fixed income. Their concern is money, not a spill, air pollution, investing in a clean energy source. 'm writing here because I don't want oil trains with their highly volatile fuel traveling through the Columbia River Gorge Scenic area. A Spill would spoil
Response: Comment incomplete.	
Becker, Barbara	What is lost is not easily gained back!
Response: Comment acknowledged.	
Briggs, Robert	When an airplane is found to have a flaw that threatens human life, the entire fleet of that kind of aircraft is grounded. Oil trains are unacceptably dangerous to be operating in our cities or on tracks adjacent to passenger trains. It is time to put a full halt on operation of these oil trains and permanently ban them from den
Response: Comment acknowledged.	
Burgon, Dirk	We do not need this dirty money. It's a new day and reality is that we have polluted and polluted and now live in a toxic world... The findings in the DEISs for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impac
Response: Comment acknowledged.	
Delmar, Roger R	Climate Change is real! Anything that can be done to keep more carbon in the ground is a move in the right direction. Preventing the expansion of moving oil by rail is one step in deterring more drilling for oil in lieu of environment friendly clean energy alternatives. Also, the findings in the DEISs for Westway and Imperium o
Response: Comment acknowledged.	
Durbin, Steve J	KEEP DIRTY, BIG OIL OUT OF OUR STATE...THEY ARE NOT WANTED HERE...STAY AWAY...!!!
Response: Comment acknowledged.	
Eggers, J.	No more oil trains!!! ABSOLUTELY NOT!!!! Those who do not respect our planet SHOULD NOT BE REWARDED! They should be PROSECUTED!!!! The findings in the DEISs for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful imp
Response: Comment incomplete.	
Erling, Bonnieclare	Leave carbon in the ground! There is too little reward from these proposals: Grays Harbor communities would take on the risk and oil c
Response: Comment acknowledged.	

Commenter Name	Comment
Franzmann, Paul	This is so wrong, start to finish.
Response: Comment acknowledged.	
Glover, Julia R.	WE DEFINITELY DON'T NEED oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings. I BEG YOU to reject the proposed Westway and Imperium oil terminals. A single major oil spill could devastate the area's marit
Response: Comment incomplete.	
Henry, Mayellen	These trains pose way too much risk to our people and our wonderful state. Just one accident could cause damage that could not be repaired. Trains do not tell us when or where they are going to derail and oil has no boundaries as to where it will decide endanger or contaminate.
Response: Comment acknowledged.	
Hill, John A	I've lived my whole life here in the Northwest and have a great and abiding love for the wonderful people and the environment here. We've seen time and again on television and in the print media the dangers posed by oil trains not only through the spectacular spills but also with the CO2 pollution that threatens our world's clima
Response: Comment acknowledged.	
Huskey, Robert C	Get ahead of the curve...new terminals for oil are behind the curve. There are much better, longer term ways to approach job creation...ways that don't contribute to destroying the ecosystem humanity depends on for its survival. I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and
Response: Comment acknowledged.	
Jacky, S J	As a citizen of Washington state, I want strong safeguards against oil spills and accidents to keep our communities healthy and safe. It's time to put people ahead of profits. Reject the fossil fuel economy. Support clean energy.
Response: Comment acknowledged.	
Janzen, Gayle	There are way too many problems that these terminals would cause to our environment and our health, such as spills, exploding trains, air pollution, noise, environmental degredation, the list goes on and on. It's really frustrating that the dirty energy industry is trying to turn the PNW into their export hub as they destroy our e
Response: Comment acknowledged.	
Klein, Chas H	What rail route does Shell propose to use to transport oil to Grays Harbor? Will they put the Columbia River corridor at risk and then come north on a section of rail that runs right down the center of I-5? Or will they use the northern tier rail and then come south jeopardizing populations in every community from Snohomish to Se
Response: Comment incomplete. Refer to Draft EIS Sections 3.15, *Rail Traffic,* and 5.1, *What is the extended study area for rail and vessel transport?* Descriptions of rail traffic in the study and extended study areas, respectively.	
Koszegvari, Kati	Stop the Oil Trains! Stop the Oil Trains! Stop the Oil Trains!!!!!!!!!! It is cheeper then later pay for legal costs, cure your sick children, and disappointing your Voters! You can help! That's where you are there! Stop the Oil Trains! There are better way to meet our energy needs. Washington State is rapidly movi
Response: Comment acknowledged.	
Kuciej, Walter A	I can force an oil spill that would devastate Grays Harbor National Wildlife Refuge, which is a necessary stopping point for shorebirds on their migration. As has been shown, oil spills will happen, wildlife will be killed, and there is no way of getting it all out of the water. There is no possible mitigation for a destroyed wet

Commenter Name	Comment
Response: See Response to FL1-1.	
MaCnab Dow, Jane	The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line from Aberdeen to Chehalis and all the way to the source of the oil in N
Response: Comment incomplete.	
Marvin, Bill	I can't believe you are seriously considering allowing new oil terminals in Grays Harbor.
Response: Comment acknowledged.	
McGarry, carl J	i fish the puget sound and do not trust oil companies with safety, they have already proven that they cannot be trusted.
Response: Comment acknowledged.	
Morse, Tyler J	The EverGREEN state needs green energy, not more oil trains!
Response: Comment acknowledged.	
Nappe, Judith G	To District 14 Washington State Legislators: The oil executives are not sane. They want more and more from oil. It is an obsession that is uncontrolled by these oil executives, and is similar to alcoholism. I hope beyond hope that someone can figure out how give these individuals relief and realization that oil is killing them
Response: Comment acknowledged.	
Norman, Seth	We've burned already. We're sucking coal dust. Railroad's history of spills is a flaming and toxic nightmare, including a spill of ethanol yesterday--wood grain alcohol that will kill countless of lifeforms downstream. The names of politicians who votes to inflict this on us will live in the records, there remind their childre
Response: Comment incomplete.	
Pierce, Priscilla	I know it is tempting to create jobs in Grays Harbor to help this disadvantaged community, but the jobs we create should be based on clean energy industry to create healthy vibrant communities, lives and jobs. We should not burden these struggling communities with the health risks and potential threat of fire from explosions due
Response: Comment incomplete.	
Sallee, Deborah	No More Oil Trains. This is not a reasonable solution for Grays Harbor or for Washington State. Instead, it is only a matter of time before the trains and the terminal give us a disaster. The findings in the DEISs for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train
Response: Comment acknowledged.	
Soares, James	PLEASE. BEFORE A DECISION IS MADE, SIT IN YOUR CAR AT A TRAIN CROSSING AS ONE OF THESE GOES BY, AND CONSIDER HOW SAFE YOU FEEL JUST IN THAT MOMENT. IT HAPPENS TO ME, 2-3 TIMES EACH MONTH - THE FUMES ARE VISABLE AND THICK - AND THE SCREACHING IS METAL-ON-METAL, A COMMON TECHNIQUE FOR MAKING SPARKS.
Response: Comment acknowledged.	
Staley, Sheri V	As a Washington State resident, I have always been proud that we seem to be smarter than the average American citizens. We have the ability to move beyond supporting the fossil fuel industry in any fashion. I love my state because of it's amazing beauty. Let's embrace it and move toward a cleaner tomorrow!
Response: Comment acknowledged.	
Steinberg, Nancy E	When will this craziness end?
Response: Comment acknowledged.	
stout, virginia F	Please STOP THE TRAINS. WE NEED TO PRESERVE OUR COUNTRY FOR THE SEVEN GENERATION OF ALL FAMILIES. we cannot afford to be short sighted.

Commenter Name	Comment
Response: Comment acknowledged.	
umphred, neal	JUST DO THE RIGHT GOSH DARN THING!
Response: Comment acknowledged.	
Wood, Sandy	We need to stop gambling with our lives and homes and futures: each oil train is a bomb train, and few of us are happy living with the odds!
Response: Comment acknowledged.	

Table 7-20. Names Associated with FUSE form letter.

a., nando	Abbott, G D D	Abullarade, Janne Y	Adams, Catherine	Agard, Lisa	Ahola, Nola Dianne
Ahonen, Patricia J	Akeia, Randa	Albinger, Kenneth L	Albrecht, Peter	Albright, Dan Harvell	Albright, Gary E
Alcorn, Christopher L	Alexander, J	Alexandra, Kathryn	Alkhalili, Darleen Shizuyo	Allen, Ed	Allen, Jim
allen, joan	Allen, Teresa Eileen	Allen, Tim N	Allyn, Jim Andrew	Almoslino, Laurie S.	Almskaar, S P P
Andersen, Barb	Anderson, William	Angel, Shanna	angell, j	Angell, Thomas W	Antonini, Antonella
Anvari, Nancy	Appis, Richard	Ard, Karen	Armond, Christine Armond	Arnold, Jim W	Arntson, David Christie
Arrington, Ardith A	Artz, Patricia A	Asmus, Sigrid	Aszman, Jan	Atmore, Wendy	Austerman, Darla
Austin, Gregory	Averett, Susan Gail	B, Shary K	Bachelder, Allen	Bachman, Bob	Backman, Lara
Bahl, Judith	Bahls, Peter F	baigas, raymond H	Bailey, Brenda S	Bailey, Stephen	Baine, Dave C
Baker, Norman Thomas	Baldwin, Page	Ballew, LouAnn	Baltin, Brian	Bancroft, Lois	Barber, Frances J
Barber, Kristin	Barcott, Nicholas	Barcott, Nick John	Barich, Cathy A	Barker, Andrew P	Barlow, Margery
Barrett, Rick B	Bartlett, Deborah	Bassett, Bev June	Bayer, John A	Beane Otis, Anne Elizabeth	Beaven, Jane
Beavin, Kathleen A	Bebbington, Philip J	Beck, Deborah	Beck, Marsha	Becker, Barbara	Becker, Robert C
Bellbrook, Dorje	Beltran, Elvia	Benedict Bain, Gail	Benedict, Marc	Bennett, Bryan Reese	Bennett, Ed
Bennington, Mary Lou	Benson, Brian	Benson, Vicky	Berolzheimer, Jean Carol	Besmer, Elaine	Biale, Cheryl A
Bichl, Frederick J	BILLARD Keller, Jennifer	Bird, Janet Marilyn	Bishop, Scott	Bjork, Vince	Blackwell, Lynn
Blaesing-Thompson, Shawn R	Blair, David	Blakney, Richard & Elizabeth	Blumenthal, Robert K	Bo, Maureen and Antonio S	Boehm-Brady, Leah
Boguske, Matthew	BOHART, SCOTT	Bonsteel, Charles Edward	Boone, Carolyn	Borso, Pam	Bosler, Kathryn E
Boss-Hall, Zenda E	Botch, Margaret	Boyce, Leroy C	braaten, chrystyne L	Brady, Patricia M	Brandt, Marianne
Brandt, Robert	Brant, Daniel	Braunwart, Tod	Brayshaw, Julia M	Brayton, Patricia	Bremer, John P
Bremner, Bryan	Bremner, Bryan A	Bressler, Celine Anais	Briggs, Geoff	Briggs, Julia Louise	Briggs, Robert
Brinkerhoff, Kenneth	bristow, Tim	Britell, Catherine W	Britton, Melissa	Brouillette-Jobe, Sandra	Brown, Doug G
Brown, Douglas	Brown, Robert M	Brunton, Beth	Brunton, James	Bryant, Anita	Buch, Anthony R
Buchanan, Carlin R	Burgon, Dirk	Burke, Jack	burrows, dara	Butler, ElsaMarie Marie	Butterfield, Lois M
buys, laura	Bye, Susan E	Byrd, Randi	Cahn, Andy B	Calhoun, Robin	Callahan, Timothy J
Cameron, Cami	Campbell, Mary S	campbell, terran H	Capobianco, Anthony	Capwell, Deborah	Card, Carolyn
Cardiff, Jeanine L	Carlson, Joel FREDERICK	Carmony, Paul J	Carone, Gary	Carroll-Crippen, Patricia	Carter, Janan
Carter, Nancy	Casseday, John	Cassinelli, Peter P	Castaneda-Barajas, Chris S	Castell, Linda J	Caster, Cynthia L
Catrambone Rosen, Maria	Caya, Jamie M	Chakraborty, Srijan	Chan, Guy	Chaney, David P	Chasse, Joe R
Chesnut, Joanna	Chester, Paula	Chismar, Nancy	Chiu, Kevin	Christante, Lexia	Citron, Noah B
Clancibell, Allison	Clark, J	Clay, Gretchen M	clayton, alec	Cochrane, Julia B	cohen, Fritzi
Colangelo, Annapoorne	Cole, Sandra L	Coleman, Claire	Coleman, Mary E	Collins, Karen	Collins, Lyle D. F
Collins, Wilfred	Collinson, Katherine Lee	Colson, Lynn	Conlan, Mike	Conn, Patrick	Conway, Clayton
Coontz, Sharron	Cooper fisher, karen	Cooper, Laurie L	Cooper, Trina Erica	Copps, M	Corbett, Todd

Cordero, Ann K	Corey, Linda	Corra, Shanta Clare	Cottrell, Kanit	Covington, Diana	Cox, Ian
Cox, Lanie	Cox, Thomas V	Crabe, Mary	Craighead, Thomas	CRANE, KIMBERLY	Crawford, Daniel
Cremer, Mike	Crerie, Richard G	Crombie, Carolyn G	Cruver, Edward	Cubbage, Nancy	Cunningham, David J
Curci, Marjorie Ann	Curry, Stephen L	Curtis, Colleen H	Curtis, Helen Candacea	Cutschall, Acadia	Dague, Michael P
Dahlgren, PhD, Mr. Shelley D	Dahlman, Diana Louise	Dale, Mark	Daloz Parks, Sharon	Damyanovich, Dan Lee	Daniels-Lee, David L
Darcy, Kevin James	Darden, Ruth E	Davidson, Donna G	Davidson, Heather	Davidson, Susan	Davis, Brad
davison, william	de Castro, Ines E	Deal, Brandie	DeClements, Mari	DeGeorge, Rebecca M	deLancey, Kris
Delmar, Roger R	Denovan, Rory	DePanfilis, Cecile	Derleth, Penny	Dickey, Kim A	Dickinson, Bob B
DiGiacomo, Maureen	Dilabio, G L	Dilley, Jean E	Dimmitt, Rafe	Dittmann, Reidar	Divin, Wesley M
Divis, Sharon	Dodson, Linda A	Doherty, Mike	Dolan, Chuck	Doman, Marie I	Domke, Del E
Donnes, Charlie & Carol Hardy	Dorfman, Ellen J	Dorsten, Mark	Douglass, Andronetta	Downing LeSourd, Michelle	Dowson, Eleanor A
Drake, Barb E	Duncan Boss, Laura	Duncan, Brian	durbin, steve J	Durnan, C & R	Durr, Rebecca A
Dwyer, Regina J	East, M Vicky	Eaton, Lorena M	Eddy, John T	Eddy, Mike	Edwards, David L. WILLIAM
Edwards, Karen K	Edwards, Robert	Edwards, Willie	Efron, Deborah Lee	eggers, j.	Ehlis Warneke, Thomas
Eklund, Glenn	eliason, sharon Yvonne	Elkins, Anne M	Ellenberger, Charles	Ellingham, Nancy E.	Elliott, Allen D
Ellis, Kathryn J	Ellman, Deborah A	Else, Carol L	Emerich, James G	Emerson, Richard H	Engele, Dale
Engh, Mary Jane	Engle, Ray	Engler, Pam Marie	Epstein, Ellen R	Erbs, Lori J	Erckmann, W James
erickson, lynda G	Erling, Bonnieclare	Eventoff, Franklin N	Fabano, Cecyl G	Fahrenwald, Gill	Farrell, Nancy L
Federighi, Jamie	Feletar, Linda Ann	Fenwick, Andrea Jules	Ferriel, Leslie A	ferrier, wendy	Ferse, Kurt Alan
Fetter, Sharon M	Feyk, Craig	FIFE, KEVIN	Filley, Margot L	Finley, Andrea Kase	Finley, Kathy
Fisher, Gloria J	Fleming, Ted	Fletcher, Carolyn E	Flores, L C	Flowers, Michelle	Follett, Thelma L
Fosburgh, Eric S	Foss, Steven M	Fowler, Ronald Vincent	Fox, Larry L	Fox, Raymond D	Franklin, Cynthia W
Franks, Larry	Franzmann, Paul	Freese, Anna	Freidberg, Colleen	French, James F	Friedman, Florence
Frogner, Christopher L	Frymire, Jack C	Fuller, Deena L	Fuller, George	G, G	G, K
Gabriel, Robert	Gallatin, Andrew	Gallery, Jillian	Galushko, Sergey	Gann, Heidi	Gannon, Elinor V
Garland, Barb	Garner, Charles R	Garrard, Thomas A	Garvey, Lydia	Gayfield, Caryn M	Gemmell, Doug Gene
Gerhard, Dan	Gersten, Robert	Gibson, Gary E	Giles, James	gillebo, wayne	Gillespie, Robert
Gilman, Christina L	Gilman, Daniel H	Ginsberg, David H	Ginsburg, Joe B	Girou, James A	Glasel, Bryan
Glaser, Nancy L	Glasgow, Dale	Glick, Gordon	Glidden, Hal R	Glidden, Helen M	Glover, R
Glover, John	Glover, Robert Kenny and M Julia	Goetzl, Tom	Goldberg, Laura	Golde, Marcy J	Goldschlag, Daya J
Gosney, Gail	Gottlieb, Olga S. S.	Gould-Donath, Reisa	Grace, Lise	Graham, Linda E	Graham, Sallie
Grajczyk, Joyce A	Gravette, Kristina	Gray, Alice D D	Greaves, Leeann	Green, Steve Lewis	Gregg, Carolyn K
Greinke, Pamylle	Grondin, Amanda J	Gross, Barbara	Gross, Vivian L	Gulick, Amy C	Guobis, Thomas J
Guy, Julianna R	Gwinn, Anita Jean	Gyncild, Brie	H, M	Hadley, Jane A	Haggin, Charles
Hait, Gordon	Haley, Stacia	Hall, Alex	Hall, Heather Marie	Hallman, Holly	Halpern, Lisa A
Hand, David F	Hanson, Donna M	Hanson, Natalie	hanson, steve	Harkins, Katharine	Harlan, Rick
Harvey, Jo	Haselby, Jessica	HASHMI, MARGARET	hathaway, pamela	Hatten, Rick G	Havens, lorena
Hawkins, David	Healy, Alan	Hedgepath, Janet L	Hedger, Lloyd M	Hedwig Backman, Karen	Heffler, Les
Heidorn, George E	Hein, Jill M	Henry, Mayellen	Herb, Aimee	Hethcote, Herbert W.	Heyneman, Amy Jo
Higgins, Andrea	Hill, John A	Hines, Nancy	Hipp, James R	Hirst, David R	Hittler, William E
Hladky, Rich L	Hlodnicki, Bruce	Hoffer, William J	Hoffman, James	hokonson, suzi	Holcomb, lorraine M
Holden, Suzanne	Holder, Mary Ruth	Holiwell, Chrystale Elaine	Holkup, Janice	Holme, Fran Regis	Holmes, Stephanie
Holtz, Eric G	Holtzman, Julie Ann	Holyk, Sherry Marguerite	Hood, Carolina Velasco	Hoover, Verrall	Horman, Nancy S
Horwitt, A	Horwitt, Ann	Hostetler, Diane	Houghtaling, Leonard	Howald, William N	Howard, Toni
Howe, Jared	Hubbard, Shaun	Hubenthal, Graham	Huelsberg, Carole L	Huey-Ray, Juan	Huff, TeriLee
hughes, jules	Hughes, Laurel	Hulbert, Susi J	Hulick, Stephen and Kathleen MARIE	Hurd, Julia	Huskey, Robert C
Hyldahl, Jausen Gerard	III, Alexander Porter	Iluna, Mana	Ilvonen, Tina L	Imani, Patricia	Inez Godbee, Allycia

Irving, Marscha M	Itano, Steve	Izeppi, T	Jackson, David Wayne	Jacky, S J	Jacobsen, michelle C
Jacobson, Lawrence M	Janzen, Gayle	Jarvis, J. R.	Jarvis, Karen	Jensen, Judy A	Jensen, Robert
Johantgen, Marie Anne	Johns, Bryan Joseph	Johnson, Angeline Elise	Johnson, B	Johnson, Christina M	Johnson, Colleen M
Johnson, Doris	Johnson, James	Johnson, LORRaine D. D	Johnson, Richard Blaine	Johnson, Rob G	Johnson, Susan
Johnston, Jill	Johnston, Lloyd A	Jokela, Mary S	Jones, Jeff J	Jones, Lee	Jones-Umberger, Stanley
Jordan, Dorothy A	Jordan, Jan	Jordan, Janet S	Jorgenson, George	Jump, Janice E E	Jurewicz, Tom C
k, Erik	Kane, Arlene	Kane, Saralee	Kangley, Blair V	Kannerstein, David	Kaplan, Eliot Joshua
Kaplan, Robert B. B	Karas, Lisa	Karll, Claudia Kelly	Karlson, Fred A	Karst, Betty	Karst, Elizabeth A.
Kaufman, Arthur	Kaylen, Sharon	Keating, Michelle	Keefe, Alicia Marie	Keefer, Kelly	Keegan, Cheryl L
Keeley, James Richard	Keeley, Pam	Kelley, Sheila	Kelly, JoAnne	Kelman, Barry I	Kemmerling, Jonelle
Kemp, Kindy	kenady, marianne	Kennedy, Alys	Kerlick, David	Kersten CHESTNEY, KAREN	Kessinger, Jerry W
Kessler, Gale	Ketter, David R	Key, Christopher	Kiesler, Sara	Kiesler, Sara BETH	Kildall, Ed.D., William
Kilgore, Susan	Kimball, Marsha R	Kimeldorf, Martin M	KINNEY, LOIS	Kirk, Kelly	Klein, Chas H
Klump, Ted R	Knecht, Patricia	Knopp, Jason	Knudson, Dorothy	Koelling, Keith	Kohl, Sybil J
Kolstad, Patricia	Koopman, William W	Korn, Meryle A A.	Korneliussen, Vivian E	Koszegvari, Kati	Kovacs-Szabao, Laurelee A
Koyama, Penny L	Kramer, Helen	kranz, steve G	Krieger, James W	Kromminga, Geri L	Krug, Janis
Krukar, Mark	Kruller, Susan	Kuciej, Walter A	Kuentzel, Peter	Kuhnhausen, Casey Karl	Kuntz, Mike S
KURTZ, AVIYAH	L, Anna	Lady, Sandra M	Laforge, Evonne	Lahans, Tai	Laird, Ned W
Lamar, Eileen E	Lambert, John S	Lamoure, Donald D	Landis, Marlene	Lanew, Maryann	Lange Barrett, Karen
langhans, judith S	Larkins-Strawn, Marianne	Larrick, Margaret Maggie E	Larson, Gary B	Lasuk, Tanya	Laursen, Richard M
Lauzon, Charlene Louise	LaVonne, Nadine	Lawlor, Bonnie	Lawrence, Christopher	Lawson, Gene H	Lawton, Larry F
Lazaroff, Ann	lazerwitz, jay	leavitt, jane	Lechner, Richard J	lee, constance	Lee, David
Lefevers, John	Lehman, Carol J	Lehmann, Heidi K	Lehner, Lora L	Leigh, Tara	Leitch, Jeff
Lengel, Elizabeth G	lenski, francis L	Levin, Thomasin	Levine, Adam E	Lewis, Mr Edward J James	Lewis, Vicki
Leyrer, Bill	Libbey, Thomas	Lileet-Foley, Rachel	Lindberg, Robert	Lindholdt, Paul J	Lindquist, Linda K K
Lindsey, JJ	Link, Rory W	Lipscomb, Ruth Ann	Little, Nancy	Littlefield, Jim	Livermore, Veronica Ann
Lockett, Jennifer K	Loerke, Alison	Loewen, K. A	Loftness, Kim	Lofton, Saab D	Logan, Corina
Lohavanichbutr, Kamol	Long, Jerrold D	Long, Sheila B	Longhom, Jill	Lonstad, Margaret M	Loomis, Gregry D
Lopez, Elizabeth	Loppnow, James R	Loucks, Cheryl	Loucks, Daniel Seth	love, kristin	Lovell, Rumeal
Low, Sammy J	Lowney, Knoll D	Lucas, Betty	Lucky, Lorie A	Luengo, Lisa	Lukich, Lyn
Luther, Sue B	Luu, Jayson H	Lyle, Janie	Lyle, Robert	Lyman, Michael	Lytle, Denise
Mabel, Joe L	MacDougall, Michael	Mach, Alex	Mackey, Melvin E	MacLeod, Sharon E	Macnab Dow, Jane
Madsen, Ellen D	Maggard, Claire J	Magliola, Lawrence	Mailman, Paul J	Malley, Kathleen J	Mallory, Jesse
Manns, Timothy R	Marceron, Dennis Matthew	Margolis, Elizabeth S	Mariano, Carol Anne	marino, nate	Markley, Shannon D
Marshall, Lloyd Gerald	Martin Krueger, Judy	Martin, Cassie	Martin, Gerry W	Martin, Melodie J	Martin, Wayne E
Martinez, Catherine	Marvin, Bill	Mason, Maryann Hackett	Massey, Linda A	Mast, Candace Elizabeth	Mathews, Brian G
Mathews, Holger Michael	Mathews, Lou E	Matsui, Vicky	Mayer, Corey Corey	Mayer, Melody J	McCandlish, Sheila Faith
Mccartan, Ellen	McCary, Kimberly A	McChesney, Evelyn	McChesney, Evelyn C	Mccleary, Donna Marie	McClintock, doug
McCluskey, Brian and Sue H	McCrary, Deirdre	McCutcheon, Meghan	McDade, Georgia S	McDaniel, Cheryl Jean	McDowell, Bonney
mcgarry, carl J	McGarry, M Adelicia	McGuffin, Beverly J	McGunagle, william	McKee, Steve	McKenney, Todd J
McKinley, Ellen B	McLeod, Daniel	McMahon, Martha	McMannis, Daniel John	McMurry, Nan	McNeely, Tom Robert
Meddaugh, Douglas M	Meekins, Jodi	Menz, David	Meredith, Barbara L	Metcalfe, Jane C	metzger, Mary
Meyer, Marlene Joy	Michael, Kristin	Michaels, Brenda Paulette	Michaels, Peter	Milke, Susan M	Millar, Riff

Miller, Grace Elizabeth	Miller, Jeanne A	Miller, Jerry	Miller, Sharon	Millican, Diane	Mills, Ed
Mills, Kenneth	Milstead, Jim	Mineard Sr, Montr	Mintz, Neil Aaron	Minzel, Shelley	Mitchell, Aaron
mitchell, darius M	Modian, Esta Lee	Monahan, Steven	Money, Edwin	Moon, Sue Allen	Morefield, Kathy
moretti, kay Ann	Morgan, Claudia Rita	Morgan, Tess L	Morris, Ted L	Morse, Tyler J	Moskowitz, Audrey
Moyle, Amanda Helene	Murayama, Joannie	Murphy, Ellen Ellen	Murrow, Gary	Murtfeldt, Linda E.	Murti, Gudrun
Myers, Blayney	Myers, Holly Marie	Myhre, Paul Jerome	Nagyfy, Desiree	Nappe, Judith G	Nattinger, Susan B
Neal, Randall	Neary, Sally Adair	Nehring, Paul	Neice, Karl R	Nelsen, Erik Noel	Nelson, Carol J.
Nelson, Elaine A	Nelson, Gwen	Nelson, katherine	Nelson, Ronald L	Neptune, Mary	Neubauer, John Arthur
Neumann, Lyla	Neuwald Falcon, Ruth	Newquist, Charles W	Nichols, Ronald	Nicolai, Jane G	Nigrath, Nigeala L
Nissen, Deborah Joyce	Norman, Seth	O., Jesse	Oaks, Michael	obenour, carol	Oberg, Marcia
Obert, Leonard D	Oborn, Roger D	Obrien, Bernadette K	O'Brien, Michael	Odell, Rollin	Oellien, Sandra
Ofteness, Tore	Ohannesian, David	Olcsvary, Michael L	Oliver, Joann	oliveri, Tom	Olsen, Earl
Olson, Jennifer B	Onufer, Mary	Orme, Kevin	Osborn, Marsha L	Oshikawa, Phyllis Helen	Osterman, Norm
Ostrander, Lucy M	Ostrom, Karl	Otto, Tyler Aaron	Oulman, Lynne C	Owen, Bobb	Ozmun, Karen Lee
Page, Peggy	Palamuso, Mike Justin	Palios, Philip	Palmer, Annie	Palmer, Libby	Palumbo, Julieann
Papadakis, Christy J	Parkinson, Andrew	Parkinson, Sarah M	parr, stacy	Parrish, Linda S	Parsley, Adina
Pasche-Lambert, Jean	Pascoe, Russ	Pasternack, Irene	Patrick, Marlene	Paul Brownlie, Rebecca	Pauley, Jean M
Pavlov, Rosemary	pearson, tia	Pendergast, Betsy A	Pennington, Sharyn T	Perez, George I	Perkins, Sherry L
Persky, William M	Peterson, Marcia	Phillips, Amy Dyanne	Phillips, Anne	Pickering, Karen	Pierce, Priscilla
Pinneo, Janet	Pistrang, Temma	Plitt, Kathryn B	Ploger, James D	Poirier, Jeanne M	Polley, Joann
popoff, dave	Posner, David B	Potter, Amanda	Potter, Syd Howard	Pottinger, Catherine	Powers, Lisa Lisa
Pratt, Adrienne	Pratt, Ted	Prehn, Peter	Prinz, Johni	Provost, Lin	Ptacek, Gail N
Puckett, Diane	Pyles, David Lee	Pyren, Ruth	Quintus, Paul L	Quistorff, Ned	R, L. F. & Carole
Rabenstein, Lynn	Radcliff, Eugene	Radford, Kathy	Radford, Lemoine	Ramberg, Tyler J	randolph, ned L
raney, dennis	Rants, Rozanne	Rasmussen, Nancy C	Rasmussen, Pat A	Rawsthorne, Grace	Raymond, Bob C
Read, Helen W.	Reading, Toniann	Redd, Ray	Redmond, Mark	Reed, Katherine	regan, nora L
Reich, Annie	Reichenbach, Randy	Reid, Elliot	Reid, Joseph E	reid, patricia A	Reidy, Tom
Reilly, Holly	Reilly, Linda	Reister, Kent S	Remmerde, Julie	Repp, Katherine	Resnick, Mark
Reynolds, Jeff	Reynolds, Michael	Rhoads, Mason	Rhodes, Lila	Rhyne, Jennifer	Rice, Damaris
Rice, Jack C	Ricevuto, Charles J	Richard, Louis	Richardson, Delaven	Richardson, Donald	Richardson, Jean P
Richman, Dor??	Richter, Karen	Riedel, SuSan	Riek, Bob J	Riffe, Sheila	Rimbos, Peter G
Ring, Susan	Rivers, Celeste	Roach, William Taulby	Roberts, Cal	Roberts, James C	Robertson Parker, Heather
Robertson, George	Robinette, Thomas	Robinson, D L	Robinson, Dorene	Robison, David	Robison, M Bruce
Rodarte, MaryKay	Rogers, Karen S	Rolsky, Bob M	Roscoe, Sandra	Rose, John & Cindy C	Rosenberry, Rick C
Rosenkotter, Barbara J	Rossen, Christine	Roth, Greg M	Rowe, Stephen	Roy, Janalee D	Rubenstein, Steven
Rudolph, Christine	Rumiantseva, Elena A	Russell, Catherine E	russell, sandra L	Russo, Jay	Saarinen, Tamara Ann
Sahm, Teri	Sallee, Deborah	Salter, Sarah	Salzano, Henry	Sanford, Robert Harold	Scaief, Margaret
Scauzillo, Suzzanne Margaret	Scavezze, Barb J	Schaeffer, Barry	Scherer, Taen	Schmeisser, Frank Edgar	Schmidt, Kevin E
Schnabel, Daniel E	Schneider, Dan L	Schnelle, Sharon A	Schroeder, Val	Schroeppel, Cyprienne F	schroff, mary j J
Schuchart, Lawrence	schultz, chuck	Schwab, Gary A	Schwab, Judith K	Schwartz, Ronlyn	Schwisow, Laurie J
Scott, Dave	Scott, Lily D	Scott, Mark R	Scribner, Denee S	Sebek, Mary L	Selander, Spencer
Selfridge, Daniel J	Senour, Dan A	Sercombe, Sarah	Shafransky, Paula B	Shaiman, Marsha	Shaughnessy, Diane
Shaw, Mike	Sheaffer, Chuck	Shearer, Cornelia	sheay, Warren R	Sheck, Sally	Shellenberger, Kent
Shelton, Charles	Sheridan, Thomas	Sherman, Mike L	Sherman, Shirley	Sherwin, John D	Sherwood, L.
Shipley, Sandy	Shomer, Forest	Shwed, Robert	Siegfried, Diana J	Silva, Will	Simpson, Joshua
Sisson, Kathleen A	Slagle, Kathryn	Sleight Brennan, Rory	Sloan, Hallie	Sloane, Sarah E	Small, Monte & Loris L
Smith, Angela M	Smith, Diane E	Smith, Jack	Smith, Jeffrey J	Smith, Michael	Smith, Sandra K
Snead, Bob	Sneiderwine, William J	Snider, Barbara I.	Snyder, Lise	Soares, James	Sodt, Peter C
sokolowski, karen H	Sol, Araya	Sonnichsen, Shirley	Sonntag, Diane J	Soprt, Charles	Sosnove, Nancy

Southwell, Nicole	Southwick, Christine L	Sovran, Vivian	Spalding, Cathy A	Sparks, Kathy R	Speed, Andrea
Spence, Michael D	Sprague, Jennifer A	Stahl, Mike	Staley, Sheri V	Stanchfield, Dennis	Stansfield, Jerry Thomas
Starkey-Anciaux, Terri	Stavis, Alex	Stay, Chris L	Steadman, Jane Garrett	Steege, Theodore J.	Steeley, Howard
Stefano, Lori	Steidl, Uli	Steinberg, Nancy E	Stephens, Mary	Stephens, Robert	Steppert, John A
Steussy, Dennis W	Stevens, Carol	Stevens, Summer	Stewart, Diana H	Stewart, Jan R	stiles, robert
Still, Amber Dawn	Stimatz, John Lee	Stingle, Karen	Stinnett, Kenneth Ray	Stoeckel, Suzanne	Stonington, David T
Stookey, Jeff	Storm, Derek W	stout, virginia F	Strauss, Jennifer	Stroh-Stern, Beth Elaine	Strom, Mary-Alice
Strong III, Sidney Joseph	Stuart Rettig, Jan	Stuart, B L	Stuhlreyer, Monica	Suckerman, Carol Ann	Sullivan, Diane
Sullivan, Jerome	Summer, Indigo	Summers, George	Surdi, Len A	Sutherlin, Paula	Sutliff, Mike
Swanberg Pegg, Helen L	Swanson, Michael	Swoffer, Thomas R	Syron, Kevin	Tabellione, Cecelia	Talbert, Paul B
Tamler, Carolyn	Tanner, Leah Rae	Tanquist, Roger B.	Tarico, David Timothy	Tate, Sharon	Taves, Peter A
Taylor, Polly Kay	Taylor, William C	Teach, Jean	Teays, Betsy	Teed, Cornelia B	Tegenfeldt, Ed and Margaret G
TEMPLE-Thurston, BARBARA A	Tethys, Yara	Thacher, Jenifer	Thirloway, Melissa	Thomas, Lisa Ann	Thomas, Robin C
Thomas, Timothy William	Thompson, Clay M	Thompson, Joe L	Thompson, John R	Thompson, Stephen	Thoms, Robert
Thomsen, Don	Thorburn Melton, Jacquelyn	thorne, jan	Thornsbury, Jean	Thureson, Anne M	Thurn, Susan
Tobias, Alice P	Tomazic, Mike A	Tooley, Ruth	Tountas, Barbara	Townsend West, Linda	Townsend, Darlene A
Tucker, Laura	Tufts, janet E	Turksel, Judy D	Ullman, Sara	Ulman, Barry	umphred, neal
Undeerwood, Dennis	unger, wanda Joy	Urias, Victoria	Uyeda, Roni	valencour, sandy	Valencour, Thomas
Van Eenwyk, Juliet	Van Johnson, Joel	Van Veen, Catherine M	Van Zant, Peter J	VanAusdle, Terri	Vidal, Levy-Armand
Vierthaler, Peter	Vintilla, Joanna	Vital, Sybille	Volkersz, Wynanda D	Von Sacher-Masoch, Michael	Vonasch, Sharon R
Vose, Virginia W	Votolato, Rocky	Wade, Bruce	Wagner, Gary	Wagner, Jena	Wall, Jaclyn
Walsh, Iris	Walter, Bernard	Walter, Jonathan	Walthew, Janet P.	Wang, Anne	ward, jennifer R
Ward, Lindsay	Ward, Matthew B	Warden, Patricia	Warfield, Virginia M.	Warner, Michael D	Watson, David G
Watson, Elizabeth M	Weaver, Julene	Weed, Ardeth L. L	Weedston, Lindsey	Weiler, Bill	Weinstein, Elyette M
Weinstock, Jason	Weir, Joyce A	Weisel, Jan C	Weiss, Paul	Weissman, Warren	Weizel, Patricia Ann
Wellman, John	Welty, Leslie	wendling, beverly	Wesley, Richard	West, Carrie	West, Janice E
Westra, Jennifer D	Westre, Willard N	Wheaton, Preston S	Wheeler, Douglas	Wheeler, Mason	White, Jeffrey
White, Laura E	White, Nancy P	Whiteaker, Louis	Whitehead, Mary	Whiteley, Judith A	Whittaker, Kara
Wickman, Jim A	Wiederhold, Joe N	Wiese, Deb	Wiley, Kimberly	Williams, Diane F	Williams, Don A.
Williams, Elizabeth M	Williams, Sherry A	Williams, Terrie	Williams, Tracy	Wilson, Doris (Jody)	Wilson, Joanne B
Wilson, Steve	Winebarger, Tina	Winkler, Daniel Nikolaus	Winnemuller, Lori L	Winstanley, William	Wislar Farneth, Sara
Wittman, Therese A	Wolfe, Kathleen	Wood, Barbara L L	Wood, Martinique	Wood, Monica	Wood, Sandy
Woodard, Merryl Lee	woods, michael	Workman, Pam	Wrangle, Cheryl	Wright, Bill A	Wright, Carolyne L.
Wusstig, Lourdes S	Wyckoff, Carol L	Y., Nancy	Yake, William E	Yallup, Marlene	Yaplee, Jeffry S
Yogev, Yonit Pam	Young, Robert	Young, Stephanie	Zahniser, Lee Drake	Zahrobsky, Suzanne	Zerr, Laura Susan

FL13 CBD

Comment FL13-1

City of Hoquiam, Washington

Washington Department of Ecology

Dear Hoquiam City Managers,

Dear Washington Department of Ecology,

I am writing to urge you to protect Grays Harbor and its people by rejecting the proposed Westway and Imperium oil terminals. The findings in the draft environmental impact statements show that the risks of oil spills, train accidents, increased traffic and vehicle delays, air pollution, noise, and harms to our wildlife, waters and people, including native tribes, cannot be fully mitigated and could result in significant environmental damage.

There's simply too much risk and too little reward from these proposals. The alarming safety record of oil trains also means that an explosive derailment is a question of when, not if. As you know in the past three years there have been 11 oil train accidents in North America, including the catastrophic derailment of an oil train in Quebec in 2013 that killed 47 people. Less dramatic, but equally concerning are the air pollution, spill risks and traffic delays oil trains would bring to communities along the rail line.

There are better ways to meet our energy needs. Washington is rapidly moving away from fossil fuels and toward clean, renewable sources. Building more big infrastructure to accommodate some of the most carbon-intensive fuels on the planet is going down the wrong path, and it's a huge economic gamble. Washington should continue to lead on safe, renewable clean energy solutions and say no to more oil and coal. I urge you to do everything in your power to stop these dirty and dangerous projects.

Sincerely,

Response to FL13-1

Refer to the Master Response for Purpose and Focus of the EIS.

Table 7-21. Unique Comments Associated with CBD Form Letter

Commenter Name	Comment
Baxter, Joan L.	Having spent time both as a student at U.of Washington and as an admiring visitor, I would deplore seeing the state take a chance on these terminals and the entire unfortunate project.
Response: Comment acknowledged.	
Bicknell, Mary	When we see what the tsunami did to Japan, we can only imagine what it would do to oil terminals on Grays Harbor. The Japanese thought they were prepared, but we are totally ignoring that there will be an earthquake and a tsunami. Now is the time to look for alternative energy sources, not after the oil has run out and beautiful state has been hopelessly contaminated. Please prevent this from happening.
Response: Refer to the Master Response for Tsunami Hazard Analysis.	
Blair, Dan and Janet	As residents of the Pacific Northwest, and frequent traveler to Washington's coast, To us, reading about all of the oil train accidents in the U.S. and Canada, this decision seems (with all due respect) like a "no-brainer." Thanks for giving our concerns your most serious and thoughtful consideration.
Response: Comment acknowledged.	
Brill, Lesley	DO NOT APPROVE THESE PROJECTS, PLEASE!
Response: Comment acknowledged.	
Bullard, Ross	I am a real person who votes. The oil companies have a proven record of lying and is an industry at the end of it's cycle, being replaced by more viable, clean forms of energy. KEEP MORE BIG OIL OUT OF THE PACIFIC NORTH WEST!!!!!!!
Response: Comment acknowledged.	
Catherine, John	WE MUST STOP DESTROYING THE ENVIRONMENT IN THE SERVICE OF MONEY!

Response: Comment acknowledged.	
Chiang, Laura	Also consider the effects of climate change on out of control fires, such as the ones Washington state faced this summer. Adding oil terminals and oil trains to the infrastructure only supports a path that will contribute to more global warming and more out of control fires in our future. Please consider clean methods of energy production instead of the Grays Harbor Terminal.
Response: Comment acknowledged.	
Cicchi, Carla	You know that transporting oil via railroad is a filthy and dangerous method and should never be done.
Response: Comment acknowledged.	
Combes, Steven	STOP THE GLUTTONY!!
Response: Comment acknowledged.	
Connor, Ann Marie	This makes the terminal project UNACCEPTABLE.
Response: Comment acknowledged.	
Coombs, Joyce	I lived in the beautiful Grays Harbor area for several years. Don't take the risk to your environment that building these terminals would bring!!
Response: Comment acknowledged.	
Coulson, Barbara	Why are the American people subjected to catastrophic accidents for the transnational companies whose only concern is their wealth? Don't people count for anything anymore?
Response: Comment acknowledged.	
Daversa, Frank	Do it because it is the right thing to do.
Response: Comment acknowledged.	
Dorn, Kathryn	Please do not put Washington residents and the world's future at mortal risk for two companies' short-term benefits.
Response: Comment acknowledged.	
Feldman, Mark	I am writing to STONGLY DEMAND THAT YOU PROTECT Grays Harbor and its people BY REJECTING THE PROPOSED Westway and Imperium OIL TERMINALS.
Response: Comment acknowledged.	
Ferner, John	As a retived environmental biologist and concerned citizen, I worked on similar issue through our field station on the Ohio River during my career at Thomas More College.
Response: Comment acknowledged.	
Fix, William	We do not want or need the nightmare of oil trains running through our lands or oil terminals on our coasts. This vast and dangerous infrastructure would not even serve Washingtonians -- the oil will be shipped overseas, where it will add to the ongoing disaster of climate change.
Response: Comment acknowledged.	
Floyd, Mary	THE OIL TRAINS ARE NOT ONLY DANGEROUS WITHOUT AN EARTHQUAKE THREAT, BUT WAIT UNTIL THE OVERDUE 9.0 EARTHQUAKE FROM THE MOVEMENT OF THE CASCADIA SUBDURAL PLATE STARTS THE BIGGEST TSUNAMI EVER! THERE WON'T EVEN BE HARBORS FOR THE OIL TO BE SHIPPED OUT OF. THERE WILL BE NO MORE COASTAL WASHINGTON! ALSO THINK OF WHAT WOULD HAPPEN IF ONE - JUST ONE, OF THE OIL TRAINS HAS A WRECK...NOT A PRETTY PICTURE!
Response: Refer to the Master Responses for Seismic Risk and Design Requirements, Tsunami Hazard Analysis, and Earthquake Probabilities.	
Frisella, Michele	WE LOVE VISITING THE GRAYS HARBOR AREA!
Response: Comment acknowledged.	
Gchesa, Elen	HISTORY WILL REMEMBER THOSE RESPONSIBLE! WHY in the world do humans continue to burn fossil fuels, KNOWING that is is leading to our OWN extinction! This is nothing short of complete and total INSANITY.
Response: Comment acknowledged.	
Ghidoni, Don	Just leave it in the ground!
Response: Comment acknowledged.	

Halligan, Michele	The children of the future will thank you.
Response: Comment acknowledged.	
Jackson, Anne	TAKE THIS VERY SERIOUSLY AND PROTECT THE NORTHWEST INSTEAD OF PUTTING IT IN MORE ENVIRONMENTAL DANGER THAN IT ALREADY IS :
Response: Comment acknowledged.	
Janzen, Gayle	The people of WA state are proud of our clean air and water and DO want it turned into the largest dirty energy export hub of the country. The last thing we need are more oil trains going through our neighborhoods carrying the extremely volatile and dirty Bakken crude and Tar Sands. We want to move forward to clean, affordable alternative energy not go backwards with evermore dirty oil. We do not want trains exploding close to our homes. We do not want ships carrying this toxic oil spilling in our fragile waters. All it would take would be one spill to destroy the marine animals who call the Salish Sea home, including the highly endangered orcas. How can you even think about greenlighting this project when it could wipe out an endangered species? Therefore,
Response: Refer to Draft EIS Section 3.5, *Animals,* for potential impacts on animals that could result from the proposed action. Section 4.7.1.3 *Animals* describes the potential impacts on animals as a result of an incident.	
Kelley, Dorinda	There is no safe way to get the crude to Grays Harbor. You would be putting your towns in jeopardy. Grays Harbor is a beautiful area so don't ruin the area.
Response: Comment acknowledged.	
Kindred, Rebecca	As a former and future (return in retirement) resident of the Pacific Northwest, I sincerely object to the probable disaster that will be waiting to happen if this proposal goes through.
Response: Comment acknowledged.	
Kirschbaum, Saran	"Those who have the privilege to know have the duty to act." Einstein
Response: Comment acknowledged.	
Klein, James	This remains a vexing problem primarily due to industry's ability to curry favor with elected officials. The corrupting influence of money in our political system is undermining our democratic traditions and discouraging Americans from voting and/or running for office. This ominous development may well end our experiment in representative democracy unless we alter this decades-long trend. For the sake of the republic, we must amend the US Constitution to state that corporations are not people (and do not have constitutional rights) and money is not speech (and thus can be regulated by state and/or federal campaign finance laws). Short of accomplishing this, no other reform of significance will be achieved. The moneyed interests will turn any reform to their benefit, often at the expense of the nation as a whole.
Response: Comment acknowledged.	
Korn, Meryle A.	The Pacific Northwest does not need to harbor "bomb trains," and the world's climate will be protected only by leaving fossil fuels in the ground!
Response: Comment acknowledged.	
Kramer-Dodd, Gay	As a native of Washington state (born in Aberdeen, raised in Tacoma) and now an Oregonian, I feel very protective of the state of my youth.
Response: Comment acknowledged.	
Leven, Marie	Our rails are in bad shape and do not need any oil trains on them! Leave the dirty oil in the ground!
Response: Comment acknowledged.	
Lockhart, Jack	Grays Harbor like my town of Everett have much better options for the future than these oil terminals with their trains feeding them that will have accidents inevitably, some of which could be devastating to our environment. One spill could take decades or longer to recover from. It isn't worth it.
Response:	
Maust, Jean	There is too much risk to our state's ecosystems and no long-term benefit to our economy. We need to shift toward sustainable energy sources - the sooner the better! Thanks for listening.
Response: Comment acknowledged.	
Mayer, Karen	These proposed terminals are typically designed to export oil, thereby using this nation to pollute here and elsewhere, while profiting at its great environmental expense.

Response: Comment acknowledged.	
Mayer, Karen	These proposed terminals are typically designed to export oil, thereby using this nation to pollute here and elsewhere, while profiting at its great environmental expense.
Response: Comment acknowledged.	
Mayer, Paul	DESTRUCTIVE AND DANGEROUS ENVIRONMENTAL HABITS OF THE 19TH AND 20TH CENTURIES DO NOT WORK IN THE 21ST CENTURY. WE ARE POISONING OURSELVES AND HURTING OURSELVES IN EVERY IMAGINABLE WAY.
Response: Comment acknowledged.	
McConnell, Kelly	This is my home, my land, MY ENVIRONMENT. STOP selling it off and selling US out to the greedy fucking rich.
Response: Comment acknowledged.	
McDonald, Mary Ann	This is unacceptable.
Response: Comment acknowledged.	
McLemore, Alan	The LAST think Mother Earth needs is more carbon thrown up into the atmosphere, and the LAST thing the country needs is more wanton destruction of her environmental heritage. Enough with the fossil foolishness already!
Response: Comment acknowledged.	
Menefee, Mendi	As a former resident of Washington state, I am highly invested in its well-being. I have seen terrible environmental mistakes being made (public lands being given away for clear-cut logging, etc.) and hope these proposed oil terminals won't become mistakes, too.
Response: Comment acknowledged.	
Miller, Deborah	There are better ways to meet our energy needs and create jobs.
Response: Comment acknowledged.	
Mosca-Clark, Vivianne	Please stop this foolishness. The oil trains are traveling bombs...even the reconstructed ones. Do not allow them to continue to transport oil in trains. How about not using oil any more. Just use renewable resources for energy.
Response: Comment acknowledged.	
Palla, Paul	THE SCIENCE IS CLEAR, AND OUR TIME IS UP! FOSSIL FUELS = DEATH!!
Response: Comment acknowledged.	
Parks, Ed	You play with fire, and you're going to get burned. You play with oil trains, and you're going to get a big spill. Think about it.
Response: Comment acknowledged.	
Pasqua, John	REJECT THE OIL TRAINS.
Response: Comment acknowledged.	
Schultz, Anneliese	I visit your beautiful state at least twice a year,
Response: Comment acknowledged.	
Schwarz, Kurt	I have visited Grays Harbor to view the wonderful shorebird spectacle it hosts. Do not destroy this valuable stop over habitat for shorebirds and other bird life.
Response: See Response to FL1-1.	
Seifert, Lisa	We love to go to the Pacific Northwest for vacation, to enjoy the pristine and beautiful wilderness, mountain to coast. Please don't let this be ruined for the future generations.
Response: Comment acknowledged.	
Strain, Judy	As a person who grew up in Washington, I care very much about the beauty of the state, and the health of the state. Please keep out the oil terminal. Thank you!
Response: Comment acknowledged.	
Szydlowski, Marilynn	This whole blanket of plans that are definitely not safe from environment disasters need to be abandoned!
Response: Comment acknowledged.	

Taylor, Kirk	This is a horrible idea, especially considering the apparent inevitability of spills that even the corporations admit to. We don't even make them clean up after themselves, And then give them TAX breaks to boot.
Response: Comment acknowledged.	
Tomlinson, Barbara	LEAVE ALL FOSSIL FUELS IN THE GROUND. 82% of Fossil Fuel Reserves must be LEFT IN THE GROUND - 82%! - if we are to avert Climate CATASTROPHE due to Global Warming. NO MORE drilling, coal mining, FRACKING, and transporting, leaking and spilling and exploding, and BURNING and spewing into the Atmosphere. NO MORE exploration for new sources! This should be Environmentalists' MANTRA: LEAVE FOSSIL FUELS IN THE GROUND. ========== Leave the OIL IN THE SOIL Leave the Coal in the Hole Leave the TAR SANDS IN THE LAND. Eliminate ALL use and extraction of Dirty Fossil Fuels for Energy, NOW! ASAP
Response: Comment acknowledged.	
Vogel, Steven	Just last week there were not one but two oil train derailments in opposite ends of the state of my birth and upbringing--Wisconsin. The one in western Wisconsin not only caught fire, but spilled thousands of gallons of crude oil directly into the Mississippi River. Please do not subject your beautiful corner of the USA to these environmental catastrophes!
Response: Refer to Draft EIS Sections 3.15, *Rail Traffic,* and 4.5, *Environmental Health Risks—Rail Transport,* for descriptions of potential impacts that could result from the proposed action.	
Watson, Donna	Recent train derailments in Wisconsin, including a spill into the Mississippi River, should well prove my point that danger to our country--both land and people--is great!
Response: Refer to Draft EIS Sections 3.15, *Rail Traffic,* and 4.5, *Environmental Health Risks—Rail Transport,* for descriptions of potential impacts that could result from the proposed action.	
Westbrook, Janet	You don't want these in your back yard!
Response: Comment acknowledged.	
Whitley, Mary	Although I live in Alabama, I am a native Oregonian and appreciate the beauty of the Pacific Northwest and the need to preserve coastal resources for not only the native population, but all Americans.
Response: Comment acknowledged.	
Wolf, Martin	Of course the ONLY reward from the proposed terminals would be extremely narrow private profit for big oil corporations and their CEOs.
Response: Comment acknowledged.	
Zerr, Laura	As a lifelong resident of the Pacific Northwest, I know the fragility of our region.
Response: Comment acknowledged.	

Table 7-22. Names Associated with CBD Form Letter

A, A	A, L	a, Mary	Abate, Andrew	Abbasparker, Ibn-Umar	Abbott, Bonnie
Abirached, Pam	Abrantes, Elizabeth	Abreu, Melissa	Absolonova, Karolina	Acebo, Ryan	Ackerman, Valerie
Acopine, Nancy	Acosta, Erika	Adachi, Margaret	Adams, Geoff	Adams, Kim	Adelson, Julie
Adrian, Stephanie	Agoitia Fonseca, Valeria	Ague, Kate	Aharonian, Natalie	Aiello, Claire	Akerley, Nancy
Alabiso, Marie	Alabiso, Marie	Albanese, Dawn	Albert, Anthony	Albert, Cheryl	alberts, allison
Alderton, Janet	Alessi, David	Alessi, David	Alexander, Cathy	Alexander, Charles	Alexander, Jenifer
Alford, Jeff	alibrandi, jill	allard, lisa	Allee, Pennelloppe	Allen, Cathy	Allgood, Jean
Allison, Jackie	Allison, Kelly	Allman, Jill	Allyn, Jim	ALMA, SHAWN	Almon, Debbie
Alvarez, Sarah	Amberger, Briana	Amdahl, ERV	An, Rose	Anacker, Celeste	Anderson, Amy
Anderson, Anthony	Anderson, Carol	Anderson, Dorothy	Anderson, Judith S	Anderson, Kristina	Anderson, Marketa
Andersson, Ben Oscar	Anderton, Phillip	Andon, Joan	Andrews, Becky	angell, j	angelo, marjorie
Angotti, Kathleen	Ann, Tina	Antone, Linda	Ãœveges, BÃ¡lint	Applebaum, Doris	Aram, Susaan
Aram, Susaan	arapoudis, sandra	Araujo, Isabel	Arbuckle, Nancy	Archibald, Nancy	Arcieri, Nicole
Arevalo, Clara	armens, karl	Armistead, Melinda	Armstrong, Johnny	Armstrong, P	Armstrong, Pamela
Arnoldsen, Barbara	Arnone, K.	Arnone, K.	Arrington, Karen	Arthur, Cheryl	Ashton, David

Askins, Susanna	asseff, sam	Asteinza, Maria	Atkinson, Ellen	Atkinson, Patricia	Atwell, J.
Auger, Sylvie	Austring, Dee	Autry, Anne	Avery, Rachel	Aydelott, Steve	Aylward, David
Ayyar, Adarsh	b, dennis	b, j	B, Jess	B, L	B, S
B., Sharon	BÃ©rard, HervÃ©	babb, kate	Babiak, Katherine	Babst, Christian	Bahris, Angie
Baier, Mary Ann	Baier, Mary Ann	Bailey, Melinda	Bailey, Norene	Bailie, Janae	Bainbridge, Kathryn
Bajwa, Ravinder	Bakane, Kathy	Bakane, Kathy	baker, byron	Baker, Emily	Baker, Norman
Baker, Tiffany	Baker-Smith, Gerritt and Elizabeth	balaska, konstantina	Baldassarre, Laura	Bancu, Mihail	Banks, Darlene
Baracca, Marco	Barberi?, Nevena	Barbezat, Mary	Barcelo, Martin	Barclay, Patricia	Barcott, Nick
barcus, ryan	Bard, Michael	Barger, John	Bari, Ina	Barmann, Matthew	Barnard, Sylvia
Barnes, Deborah	Barnes, Robyn	barnes, sophie	Barney-Campbell, Noenoe	Barondes, Lynda	Barondes, Lynda
Barr II, David	barr, cassie	Barr, Rachel	barrand, christina	Barrett, Lisa	Barrio, Maria Sagrario
Barron, Mikail	Barry, Roland	Barry, Steven	Bartoli, PhD, Renata	Bassett, Susan	Basye, Mae
Basye, Mae	Batchelor, Sue	Battaly, Gertrude	Battle, Dorothy	bauer, bruce	Bauer, Kelly
Bauer, Robin	Baum, Miriam	Bauman, Sarah	Baxter, Joan L.	baxter, susan	baysinger, mary
Beals, Alan	Beauchamp, Catherine	Beauchamp, Marian Beth	Bechmann, Elisabeth	Bechmann, Elisabeth	Beck, EA
Becker, janice	Becker, Kay	Beckord, Katharina	bedinger, gail	bedinger, gail	Begalske, Leigh
Behl-Whiting, Kathy	Beil, Dr. Charlie	Bein, Ann	Bein, KEith	Beja, Nuno	Bekkers, Anne
Belknap, Robert	Bell, Denise	belloso-curiel, jorge	Belt, Annie	Benes, Michelle	Benet, Mercedes
Bening, Allison	Benjamin, Christopher	Benjamin, Corey	Bennatti, Carolyn	Bennett, Ed	Bennett, LeeAnn
Bennett, Virginia	Bennett, Virginia	Bentley, Cynthia	Benton, Susan	Bentz, Eva	Berberi, Julie
Berg, Elaine	Berg, James	Berg, Laura	Bergemann, Melissa	Bergeron, Terry	Bergstrom, Bo
Berke, Allison	Berkemeijer, Belinda	Berkowitz, Henry	Berlin, Maja	Berliner, Diane	Berman, Mark
Bernardes, Daniela	Bernat, Susan	Berner, Julia	Bernhard, Lucienne	bernstein, lois	Berry, Linda
Berzel, Janice	Best, Victoria	Besteiro, Marisa	Betts, Linsey	Beverly, J	Bhakti, Sara
Biale, Cheryl	Bicknell, Mary	biggins, henry	Bigstyck, Tygarjas	Bills, Barbara	Bills, Barbara
biondo, peter	Bishop, Cori	Bishop, Melissa	Bishop, Nancy	Biss, Jeffery	Bixter, Pam
Blackburn, Beverly	Blackham, Uphoria	Blaesing, Shawn	Blain, Susan	Blair, Dan and Janet	Blake, Susan
Blakeman, Hannah	Blakley, Margaret	Blanchardsl, Robert	Blanchette, Jean	Blevins, Patricia	BLOCH, NINI
Block, Gary	Bloedow, MaryAnn	Blue, Cindy	Blum, Denny	Blumenthal, Robert	Boggs, Jerry
Bohannon, Sarah	Bohn, Nina	Boise, Gretchen	Bokhan, Yana	Bonatti, Karen	Bond, S
Bonetti, Donna	Bonilla-Jones, Carmen Elisa	Bonnheim, Joanna	Bonnheim, Joanna	Bonta, Marcia	Bonvouloir, A
Boone, Jim	BOOT, PATRICK	Booth, Richard	Borchers, Margie	Bordelon, Tika	Bores, Suzanne
BORGARO, Heather	Borgquist, Ronald B.	Borman, Heather	Bornholtz, Gavin	Bornstein, Brad	Borrett, Jill
Borske, Cindy	Boss, Dylan	Botticelli, Carole	Bouchard, Aaron	Bouchard, Aaron	Bourlotos, George
Bousquet, Bob	Bowland, Denise	Bowley, Kat	Bowling, Beth	Bowling, Keri	BOYD, JUDITH
Boyer, David	Boyne, Jonathan	bracciotti, federica	BRADBURY, david	Bradley, Kathy	Bradley, Stacey
Bradshaw, Lael	Brady, Ann K	braggiotti, laura	Brand, Dennis	Brandler, Barbara	Brandner, Julia
Brandon, Jennifer	Braoudakis, Spyros	Brashear, Laura	Bravo, Karen	Braxton, Angelika	Brayfield, David
BreÃ±a Valle, Emelia	Brechner, Jeri	Breen, Margo	Brehm, Lisa	Bremer, John	Brenner, Jared
Brenza, Tina	Bresson, Sheri	Brichoux, Karen	Bridges, Linda	Bridwell, Jack	Brill, Lesley
BRITTON, BARBARA	brock, jon	Brockman, Bette	Broda, Patricia	Bromley, Susan	Brookman, Gerald
Brooks, Ben	Brooks, Dianne	Brooks, Sandy	Brooks, TJ	Brown, A.J.	Brown, Deja
Brown, Donna	Brown, Duncan	Brown, Elaine	brown, leslie danielle	Brown, Nancy	Brown, Paul
Brown, R	Brown, Rebecca	Brown, Scott	Brown, Tracy	Browning, John	Brownlee, Cathy
Brozell, Chris	Bruce, Barbara	Brueder, Wendy	Brultz, David	Brummette, Carrie	Brunick, Cathy
Bruton, Babette	Buchanan, Carolyn	Buchanan, Heather	Buchner, Scott	Buchsbaum, Judy	Buck, Maxime
Buck, Sharon	buckley, nan	Buergermeister, Sabine	Buffie, Elise	Buhowsky, Joe	Bullard, Ross
Burch, Bev	Burch, MaryAnn	Burgen, Julia	Burghardt, Kim	Burgoon, Larry	Burgos, Pablo
Burke, Maureen	Burnett, Robert	Burns, Bruce	Burns, Charlie	Burpo, Leslie	Burr, Tracy
Burrell, Denese	Burson, Grace	Burson, Sandra	Burton, Vic	Bush, Julie	Bush, Veronica
Busse, Judith	Butler, Edward	Butler, Maggy	butler, sam	Butler, Tom	Byknish, Chris
Byrd, Darlene	Byrne, Nick	Byrnes, Amanda	C, Christopher	C, Joe	C, Sandra
C., Lynne	Caballero, Nicolas	Cabezud, Carlos	Cabral, Edgar	Cacioppo, Judy	Cacoullos, Nike

Calambro, Leslie	Caldie, Cathy	Caldwell, Scarlett	Califano, C	Calkin, Kelly	calvert, chris
Cameron, Greg	Campbell, Donna	Campbell, Jesse	Campbell, Susan	Canada II, Riley	Canarsky, Maurine
Cancell, June	Cannell, Patricia	Canright, Rebecca	Cantori, Juha	Canty, Susan	Caolo, Rosemary
Cappi, Silvia	Caputo, Renee	Car, Margareta	Carbary, Lawrence	Carbia, Vanessa	Card, Geraldine
Cardella, Richard	Cardella, Sylvia	Cardinal, Enid	Cardoso, Toby	Cardoso, Toby	cariglia, renee
Carlon, Chris	carlson, carol	Carlson, Judith	Carlson, Matthew	Carmean, Roxann	Caro, Maria Sol
Carosella, Christy	CARPENTER, MICHAEL	Carr, Barbara	Carr, Cassandra	carr, d	Carr, M.D., Donna
Carr, Mar	Carr, Rhonda	Carson, Karen	Carter, Rob	Carter, Sandy	Carter, Virginia
Carter-Lovejoy, Steven	Cartwright, Carl	Cartwright, Kathy	carvajal, mauricio	carvajal, mauricio	Casale, Veronica
Casey, Carol	Casner, George	Caspers-Curl, Karen	Cassens, Susie	Cassens, Susie	Cassens, Susie
Castanares, Jana	Castanares, Tina	Castro, Carlos	Castro, Carlos	Caswell, Gail	Catherine, John
Catlin, Linda	Cavallo, Janet	cecil, jan	Cepela, Fred	cevasco, john	Chadwell, Maribeth
Chalmers, Kirsty	Chambers, Patricia	Chambless, John N	Champion, Avery	chan, sonja	Chaney, Sarah
Chapman, Kevin	Charter, Pat	Chase, Felicia	chase, michael	chatel, nadine	chatelain, kory
Chatigny, Diane	Chavez, Phyllis	Chavis, Allison	Chen, Allan	Cheney, Sanderra M	Chervek, David
Chesrow, George	Chi, AniMae	Chi, AniMae	Chiang, Laura	Chiazzese, Louise	Chillcott, Thomas
Chiquoine, Selinda	Chirpin, Robert	Chisari, Andrea	Cho, Dean	Chouinard, Jocelyn	Christensen, Ann
Christenson, Amy	Christoff, Stephanie	Christoff, Stephanie	Chrupka, Jeremy	Chu, J	Chynoweth, Iris
Cicchi, Carla	Cimino, Maryrose	cipik, jana	Cippel, Maureen	Cisna, Todd	Ciszek, Charlotte
Clapper, David	Clark, Diane	Clark, Frances	Clark, Stephanie	Clark, Tina	Clark, Todd
clark, valerie	Clarke, Michael and Jeanine	Claus, Carol	clausen, karen	Clayman, Julie	Claypool, Margaret
Clayton, Michael	Clayton, Ronald	clemente, claudia	Cleveland, Jill	Clifford, Kate	clisson, marjorie
Cloud, Jarrett	Cloud, Michael	Clouser, Marcia & Robin	Clymer, Lois	Coakley, Michele	Coats, Marilyn
Cobb, Sandra	Cobut, BenoÃ®t	Cocker, Elizabeth	cocores, carmen	Cody, T. Stephen	Coe, Joyce
coen, dora	Cohen, Judy	Cohn, Nancy	Colafranceschi, Tina	Colebank, Darryl	Coleman, Brian and Brenda
Collecchia, Geri	Collins, Carol	collins, gerry	Collins, Greg	Collins, Teresa	Collins, Virginia
colony, pamela	Colson, Joanne	Colyer, Leslie	Combes, Steven	Commons, Judith	Comrack, Janine
Comstock, Jo Ann	Conklin, Crystal	conn, craig	Conner, Eileen	Connor, Ann Marie	Conrow, Bonnie
Conroy, Faith	Conway, James	COOK, CHARLOTTE	Cook, Cheryl	Cook, Craig	Cook, Orrin
Cook, Peter	Cooke, Douglas	Cooley, Marian	Coombs, Joyce	Coontz, Sharron	Cooper, Ruth
Cooper, Sylvia	Cooper, Sylvia	Corah, janet	Corbett, Tina	corley, bert	Cormier, Joanne
Cornelia, Jared	Cornelius, Don	Cornelius, Gillian	Cornez, Sandi	Corrigan, Sean	Corris, Joshua
Corwin, Cecil	cosci, lucia	Cosgrove, Donna	Costa, Sandra	Couch, Sandra	Coulson, Barbara
Countryman-Mills, Gayle	courtney, kyle	Covington, Laurel	Cowen, Karen	Cowin, Caryn	Cox, Veronica
Cozier, Mary	Cozzi, Steven	Cozzo, Sandra Viviana	Craig, Carol	Craig, Isobel	Craig, Mary
Cramer, Linda	Crandall, Analisa	Crandall, Lynn	Cranford, Connie	Cranmer, Julia	Cranmer, Pat
Cratty, Bruce	Creech, Jeff	Cresseveur, Jessica	Crider, Nancy	Cripps, Phillip	Crist, Kathy
Crist-Whitzel, Janet	Critz, Catherine	Crockett, Scott	Crockett, Shan	Cromwick, William	CROSLEY, MICHELE
Crouch, Jill	Crouser, Paul	Crouter, Norman	crow, michelle	crowe, clark	Crump, Ruth
Crupi, Kevin	Cruz, Marian	Csaszar, John	Csenge, Debra	Cudd, Karin	Cuevas, Tom
Cuff, Kermit	Cummins, Peter	Cunha, Carlos	Cunningham, Alan	Cunningham, Debra	CUNNINGHAM, IAN
Cunningham, Jennifer	Curia, Peter	Currie, Marianne	Curry, Stephen	Curtis, Marie	Cwang, Ron
Cyriac, Cigy	Czykieta, Zygmunt	D, A	D, William	Dace, Letitia	Dadpagouh, Eudora
Dahlgren, PhD, Mr.Shelley	dahlstrom, gina	Daidone, Angela	Dail, Simone	Daily, G Allen	dakouzlian, marge
Dale, Barbara and Jim	Daley, Suzann	dalli, wendy	Dallin, Eric	Dallis, Dimitris	Daly, Paul
Dane, William	Danehy, Cecile	Daniels-Dattilo, Stacey	Danko, Lori	Dansie, Karina	Dantuono, E.
Darby, GloriÃ	Darden, Ruth	dashe, julia	Davenport, Donna	Davenport, Lyndhanne	Daversa, Frank
Davidson, David	Davidson, Susan	Davies, Anne	Davis, Diane	Davis, Joan	Davis, Kalin
Davis, Liz	Davis, Todd	Dawson-Rhodes, Juanita	day, c	Day, Edward	Day, Kathy
De Bruyne, Julie	Dean, Eugene	DeBing, Therese	Decargouet, Yves	Dee, Diana	Deemer, Susan
Deems, Robert M.	DeFauw, Rachel	Defrin, Elin	Delaney, Janet	Delaney, Linda	Delattre, Angelique

Delgado, Barbara	DeLia, Dr. Tony	Dell, Dorothea	DellaLoggia, Denis	DelMonaco, Marisa	DeLoma, Elizabeth
DeLucia, Gennaro F.	DeLuke, Jan	DeLuna, Marie Claire	DeMark, Christi	Demos, Stephen	Denney, Sherrie
Denning, Asphodel	DENNISON, Donna	Denton, Michael	Derleth, Penny	DeRoy, Al	Dersch, Lou
DesMarais, Lauri	Desmond, Sheila	DeStefano, Robert	Devine, Lauren	DeVine, Mandy	Devito, Barbara Daiana
DeVries, Dolores	Dewees, Carol	DeWitt, Vernon	D'Gaia, Claire	Di Cunto, Flora	Diamond, Nichole
Diaz, Herman	Dibb-, Carl	Dick, Kathy	dicken, don	Dickinson-Adams, Emily	Dicus, Laura
DIEBOLT, Anne lise	Diehl, Wm James	Dillingham, Mark	Dillon, Shannon	Dillon, Sheila	Dillon, Sheila
Dishman, Patricia	dittmar, trudy	Dixon, Joyce	Dobbelaere, Ainga	Doherty, Jeanne	Dolan, Darry
dolittle, jo	Dollar, Ellen	Domanski, Karen	Domke, Ellen	Domulevicz, Glen	Donaldson, John R
donley, nathan	Donnelly, Lisa	D'Onofrio, Adam	Donovan, Patrick M.	Doochin, Dianne	Dorn, Kathryn
Dorn, Valerie	Dotson, Mike	Doty, Carol	Doucet, Lisha	Dougherty, Lyle	Douglas, Kenneth
Douglass, Lisa	Doulatshahi, Paulette	Dow, Ann	Dow, Roxane	Dowling, Christopher	Dowling, Christopher
Dowling, Holly	downey, deirdre	Downing, Roz	Doyle, Kathleen	Dragavon, Linda	Drees, Kevin
Drembus, Joel	Dremeaux, MYRA	Dreste, Arlene	Drew, Janet	Driskill, Anna	Driskill, Anna
Drucker, LM	Drumright, Chris	Dryden, William	Dubois, Gilles	DuBois, Sara	DuBois, Sara
Ducluzeau, Martine	Duffus, Kathleen	Dugmore, Wendy	Dulberg, Joan	Duleba, Natalie	Dunaway-Brown, Trudy
Duncan, Sue	Dunham, Jack	Dunham, Kathy	Dunlap, Dorothy	dunn, kristi	Dunn, Richard
Dunn, Timothy	dunphy, lisa	Duong, Nic	Duran, Janet	DURJAK, Katarina	Dusenberry, Russell
Dutra, Ron	Dutto, Marie	Dutton, John	Duvall, Amalie	Dyer, Jym	Dykema, Cornelius
Dymeck, Dennis	Dymeck, Terri	Dyson, Sarah	Dzija, Juliette	Dzolev, Gjorgji	eades, nick
Earle, Nancy	Earnest, Patty	Earnshaw, Shinann	eastes, mary	eastes, mary	Easton, Brian
Easton, Brian	Eaton, Alexandra	Eden, Jonathan	Eding, Megan	Edmonds, Teresa	EDMONDSON, JACQUELINE
Edson, Patricia	Edwards, Eric	Edwards-Thrasher, Ellen	EGGERT, FLORENCE	Ehrenhaft, Janice	Eielson, Olivia
Eisemann, Cathy	eisenstaedt, kevin	Eisner, sara	Elbirt, Diana	Eldredge, Mary	Elias, Johanna
Elizabeth, Mary	Elliott, Benton	Elliott, Jan	Elliott, Kathryn	ELLIOTT, RICHARD	Ellis, Norm
Ellison, Pat	Else, Carol	Elston, Marsha	Eltgroth, Nicholas	Emerson, C	Emrys, Merlin
Emshoff, Arthur	Enevoldsen, David	Engelman, Lavonne	Engle, I.	Ensign, Dianne	Erdmann, dONETTE
Erickson, Elaine	Erickson, Enid	Ernst, Jeannette	Eschbach, Susan	Esposito, Dan	Esser, Nicholas
Estacion, Carlene	Etherton, Stephanie	Eudy, Elaine	Eustis, Linda	Evans, A. S.	Evans, Bronwen
Evans, Chad	Eve, Tracy	evenson, marilyn	Everett, Nicole	Eversole, April	Evinczik, Eric
F, Jennifer	F., Rita	Fabiano, Donna	Facey, Laurel	Faich, Ron	Fairchild, Jennifer
Fairchild, Jennifer	Farnsworth, Stu	Farquhar, Jacqueline	Farrar, Stephanie	Farrar, Susan	Fecko, Albert
Federman, Steven	Feissel, John	Feldman, Mark	Feldmann, Heike	Fellows, Leslie	Fenster, Steven
Fenza, Karen	Feokhari, Anton	Feran, Michael	Ferner, John	Ferreira, Manuel	Ferri, Sandra
Feugier, Magali	Feuille, Leslie	Fexis, Deborah	Feyhl, Jo	Fiedler, Ed	Fiedor, Jillian
Fielden, Jessica	Fielder, Aixa	Fielder, Aixa	Filatov, Sergey	filippi, janet	Filley, Jasmine
Fillmore, Jamie	Fine, Cindy	Fingerhood, Phyllis	Finley, Patricia	Finn, Jim	Finnegan, Pamela
Fiore, Mark J.	fischer, claudia	Fischer, Dennis	Fischer, Patrick	fisher, amy	Fisher, Laurie
Fisher, Marcus	fisher, melanie	Fisk, Todd	Fissel, Peter	Fissinger, Kaye	Fistick, Stanley
Fite, Gregory	Fitze, Charles	Fitzgerald, Gerry	Fix, William	Fladger, Robert	flavie, barret
Flores, Anthony	Flores, Anthony	FLORES, GEORGE	FLOYD, MARY	floyd, teresa	foley, susan
Fonshill, Don	Foot, Jimmy & Susie	Forbes, John	Ford, J.C.	Ford, Joan	Ford, Robert
Foreman, James R.	forman, fay	forman, janet	Fornagiel, Valeri	Fornataro, Maria	Forschner, Jillian
Fortini, Jan	Foskett, MaryAnna	Foss, Maryann	Fost, Rebecca	fostel, karen	Foster, Beverly
foster, lorraine	Foster, Merle	foster, winnie	fountain, ashleigh	Fournier, Eric	Fournier, Michelle
Fox, Charles	Frances, Barbara	Frank, Robert	Frank, Sharon	franklin, john	Franklin, Rosemary
Franks, William	Fraser, Evelyn	Fray, Antje	Frazier, Maggie	Frazier, Martin	frazier, shelley
Freedland, Nancy	Freedman, Matt	Freehill, Maureen	freeman, myrna	Freeman-Steele, Marta Lynn	Freese, Carol
Frega, Doreen	French, James	French, Larry	Frey, Kimberly	Frey, Michael	Friis, Rolf
FRINDEL, Perrine	Frisella, Michele	Frost, Jenifer	Fuchs, Ryan	Fuente Gomez, Unai	Fuentes, Ivan
Fuhrman, Jed	Fujimaki, Dychi	Fukushima, Shinobu	Fulgham, Wolfie	Fulwiler, Fran	Fulwiler, Fran
Fulwiler, Fran	Fumarola, Aaron	fuqua, chad	Furness, Kathleen	Furniss, Karen	Fursich, Rob
g, g	g, k	G, Rachel	G., Lorraine	Gaarlandt, Jonathan	Gaff, Mal

Gaff, Mal	Gage, Kyle	Gage, Susan	Gaiser, JÃ¶rg	Gallagher, Kevin	Gallagher, Margaret
gallanosa, kristin	Gallart, Francine	Gallegos, Mark	Gallegos, Mark	galtier, ghislaine	Gambardella, Stella
gamble, fairlee	Gamble, Frederica	Gamboa, Brittany	Gandolfo, Deborah	Garber, Sandra	Garcin, Mary
Gardner, Susan	garetz, diane	Garlena, Sharon	Garman, Ian	Garrett, Thomas	Garvett, Esther
Gaston, Tina	Gatenby, Dr. Anthony	Gaudsmith, Henry	Gaya, Alexander	Gaybbit, Roselle	gchesa, elen
Genasci, Elaine	Genasci, Elaine	genaze, matthew	Gendvil, Derek	Genest, Carol	George, Laurence
George, Mark	German, Dianne	Gerondale, Brianna	Gessert, Kate	Geurkink, Sue	Ghidoni, Don
Gibson, Claudia	Gibson, Jody	Gibson, Mary Jane	Gibson, Raymond	Gilb, Amanda	Gilbert, Camille
Gildehaus, Marie	Giles, Sally	Gill, LFJ	Gill, Raymond	gillono, mark	Gingras, Brian
Giordano, Anthony	Gish, W.	Giuliani, Claudia M.	Glatter, Katherine	Glick, Art	glick, barbara
Glidden, Hal	Glinski, Richard	Gluckman, Geoff	GOBELY, MICHELLE	Goden, Gay	Godinez, Richard
Goeken, Murlin	Goertzen, Lynn	Goff, Frances	Golden, Jerry	Goldfarb, georgia	Goldman, Lisa
Goldman, Ron	Goldman-Hull, Sergi	goldsmith, charles	Goldsmith, Gail	Goldstein, Freya	Goldstein, Steve
Gomes, Gustavo	Gonsoulin, Vickie	Gonzalez, Rob	Gonzalez, William G	Goode, Beth	Goodreau, X-tine
Goodrich, Cathy	Goodrich, D'Arcy	Goodson, Ashley	Goodwin, Sheryl	Goossens, Clara Pichi	Goppert, Donald
Gordon, Marcia	Gordon, Marcia	Gordon, Suzanne	Gore, Robert	Gorges, Robin	Gorsetman, Mark
Gottlieb, Jonathan	Gould, Jacqueline	Gould, Kimmie	Gould-Martin, Katherine	Govito, Stacey	Govreau, Kathy
Goyette, Roland	Graanoogst, Audrey	Grabowski, Kathy	Grage, Leona	Gragel, Jim	Graham, Guy
Granath, Karl	Grant, Gordon	Grassia, F S	Graul, Kara	Graves, Caryn	Gravette, Kristina
Grawunder, Marc	Gray, Lisa	Grech, Rhyan	Green, Alex	Green, Alice	Green, Arden
Green, Carl	Green, Elaine	Green, June	Green, Rax	Greer, Jamie	greger, sabine
Gregord, Amy	Gregorian, Arthur	Greinke, Pamylle	Grier, Linda	Griffeth, Jackie	Griffin, Denise
Griffin, Denise	Griffin, Lisa	Griffith, Barbara	Grigsby, Heather	Grosh, William	Grosland Jones, Angie
Grossi, Joanne	Grossman, Bonnie	Grove, Debra	Gruman, Vicki	Grunblatt, Michael	Grushko, Olga
Gubernick, David	GUETH, Pierre and monique	Guevara, Alicia	Guggino, Monique	GUIMAS, Agnes	Gump, Thomas
Gunter, Karlene	Guntharp, Kelsey	Gurtner, Ellen	Gustafson, Owen	Gutierrez, Emmylou	Ha, Al
Haag, Karin	HaanpÃ¤Ã¤, Maria	haddad, reem	Hadden, Katherine	Haemmerle, Joseph	Haepers, Ben
Hafer, Sarah	HAGELE, BOB	Hagenbuch, Stephanie	Hager, Beverly	Hager, Jon	Hagerty, MC
Hagmeier, Clarence	Hahn, Todd	Haines, Shauna	Halfin, Clara	Hall, Carol A.	Hall, Heather
hall, phoebe	Hall, Ryan	hall, shelly	hall, silvia	hall, silvia	Hallett, Mark
HALLIGAN, Everett	Halligan, Marcia	Halligan, Michele	Halligan, Sue	Hallman, Hollie	Halloran, Neal
Hamann, Craig	Hambleton, Pamela	Hamboyan Harrison, Tatiana	Hamburg, Bob	Hamilton, Donna	Hamilton, Frederick
Hamilton, Heather	Hamilton, Sibby	Hammel, John	Han, Richard	Handsaker, Heidi	Hanes, Richard
Hanikka, Esa	Hannah, Mark	Hansen, Krista	Hansen, Molly	Hanson, Edward	Hanson, Sue
Harcksen, Kathleen	Hardiman, G	Hargraves, Mark	Harker, Jana	Harper, Randy	Harrell, S
Harrigan, Lynn	Harriman, Frances	harrington, sue	harrington, tyler	HARRIS JR, J. M.	Harris, Donna
Harris, Jamie	Harris, Jennifer	harris, tom	Harris, Wayne	Harrison, Jennifer	Harrison, Marty
Harrison, Norma J F	Harrison, Randy	Harrison, Scott	Hart, Kathy	hartl, harriet	hartleben, christian
Hartlieb, Matthew	Hartman, Jenifer	hartman, nancy	Harvey, Jef	Haskell, Michael	Hatfield, Carol
Hauge, Erik	Haugen, Bob	Haunhorst, Martin	hauswald, christina	Havan, Artineh	haverkamp, kathy
Havlik, Hugh	Hawkins, Patricia	Hayes, Jennfer	Hayhoe, Elizabeth	Haynes, Linda	Hays, Helen
Hayward, Meredith	Head, Kris	Headley, Linda	HEALEY, KATHRYN	Heath, Linda A.	Hebert, Joan
Hebert, Melissa	heffron, joshua	Hehn, Paulo	Heide, Andra	Heikkinen, Christopher	Hein, Kurt
Heisler, Darlene	Heist, Roberta	Held-Warmkessel, Jeanne	Hemenez, Jeffrey	Hemmingsen, Jim	Hempel, M
Hemzacek, Elizabeth	Henderson, Martin	Hendrickson, Alec	Hendrickson, Alec	Hengesbaugh, Matt	Henley, Charlene
Henley, Pamela	hennessey, john	Henrich, Dr. Alexander	Hensgen, Eric	Herger, Loretta	Hering, Janine
Herlinger, Nancy	Herman, Bill	Hermann, Birgit	Hernandez, Ricardo	Herndon, Laura	hess, evelyn
Hesselink, Joanne	Hey, Jane	Heydenreich, Robert	Hickman, Jennifer	Hieb, Laurel	Higgins, DH
Higgins, Susi	Higginson, Judy	Higson, Howard	Hilbert, Harrison	Hilbert, Harrison	Hildenbrand, Pamela
Hildreth, Stephanie	Hileman, Inez	Hill, Jennifer	Hill, Michael and Barbara	Hill, Sheri	Hillen, Melissa
Hills, Mary	Hinchman, Ray	hines, norman	Hink, Lani	Hinkelman, Carol	Hittel, Kenneth
hlat, mike	Hlodnicki, Bruce	Hobbs, Jana	Hobbs, Pat	hochendoner, bernard	Hodes, Harold T.

Hoekstra, Tim	Hofberg, Eva	Hoff, Beverly	Hoffmann, Ricky	Hofford, William	Hogan, Gretchen
holland, gabriele	Holland, Grace	hollinrake, mark	hollister, david	Hollon, H	holmberg, oscar
Holmes, Katherine	Holmes, Sara	Holoubek, mark	Holtzman, Dorothy	Holz, Dennis	Hood, Mary
Hoover, michael	hope, phillip	Horne, Shari	Horne, ValÃ©rie M.	Horner, Jerry	Horton, Chris
Horwitz, Martin	Horwood, Sue	Hougham, Tom	Houghton, Natalie	Houmes, Cleda	Houston, mandi
Hovermill, Earl	Howard, Erin	howard, karen	Howard, Kristen	Howard, Paul	howe, jeff
Howes, Wendy	Howlett, Julia	Hubbard, Linda	Hubbard, Ron L	Huber, Tara	Hubert, Ron
Huddleston, Molly	Huffman, Melodie	Huffsmith, Jennifer	Huggins, Heather	Huggins, Roxana	Hughes, Cheryl
Hughes, Kevin	Hughes, Kim	Hughes, Sarah	hughes, vicki	Hull, Cynthia	Hull, Gary
Hull, Juanita	Hull, Pieter	Hummel, Erica	Hundemer, Sarah	Hunt, David	Hunt, Lesley
Hunt, Pam	Hunt, Robert	Hunter, D.M.	Hunter, Joann	hurst, darcia	Hurt, Luc
Hurwitz, Jeffrey	husby, jason	Hutchings, Hazel	Hutchins, Katherine	Hutchins, Tiffany	Hutton, Thomas
hyatt, yvonne	Hyland, Lillian	Hynous, Dorothy	I, Madeline	Ice, Krysta	Ikeda, Ginger
ilaria, alunni	ILLG, Gordon	Ingalls, virginia	Ionina, Kate	Iosif, Katherine	Iovino, Teresa
Ireland, M.D., Karen	Ismail, Hildy	israel, miriam	j slobin, janet	Jackson, Anne	jackson, jenice
Jackson, Rena	Jackson, Sue	Jacob, April	Jacobs, Kathy	Jacobs, Renee	Jacobsen, Claire
Jamal, Kate	Jamison, Vanessa	Janczuk, Stan	Janty, Eric.	Janzen, Gayle	Jasiukiewicz, Anna
Jasper, Alan	Jean, Carole	Jehn, Robert	Jenkins, Albert	Jenkins, Linda	Jenkins, Lynn
Jensen, Catherine	Jensen, Dena	jensen, melanie	Jensen, Todd	jessler, darynne	Joannou Jr, Benjamin
Jobling, Catherine	Jocz, Ed	Johannsen, Mary	Johanson, Erica	John, Leland	Johns, Barbara
Johnsen, Joan	Johnsen, Kenneth	Johns-Goodman RN MSW, Sarah	Johnson, Andrew	Johnson, Carol	Johnson, Carol
Johnson, Catherine	Johnson, Chad	Johnson, Dwight	Johnson, Jennifer	Johnson, Karolina	Johnson, Lee
Johnson, Lorraine D.	Johnson, Matt	Johnson, Matt	Johnson, Nancy	Johnson, Tom	Johnson, Yvonne
Johnston, A	Jolly-Van Bodegraven, Mark	joly, frederique	Jones, Andrea	Jones, Clayton	Jones, Devon
Jones, Eric	Jones, Gene	Jones, Linda	Jones, Lynne	Jones, Rod and Terri	Jones, Sydney
Jordaan, Liza	jordan, corinne	Jordan, Dorothy	Jordan, Joseph	Jordan, Mark	Jorge, Roselyne
Jost, Ronald	Joy, Darrel	JOY, KRISTA	k, hitomi	K, Jo	Kahn, Rene
Kalinowski, Mary	Kalinski, Ray	Kalousi, Maria	Kammer, Karen	Kampa, Jan	Kane, Mike
Kane, Mike	Kaplan, Stephanie	Karas, David	Karbhari, Corinne	karns, rev scott	KASTEL, DIANE
Kastner, Margean Kastner	Katsarou, Litsa	Katterson, Melissa	Katz, Jerome	Kaufman, Michelle	Kaulbach, Katharine
Kautz, Katherine	Kawszan, Karen	Kaye-Carr, Josh	Kayyali, Bergith	Kazandjian, Helena	Kearns, Marj
kearns, patric	Keats, Robert	Keeling, Raymond	Keene, Margaret	Kegler, John	Kegler, Lori
Kegler, Susannah	Kegler, Tyler	Kegler-Williams, Isla	Keiser, Peter J.	keith, sharla	Keithler, Mary
Kellam, Marcia	KELLER, KATHLEEN	kelley, dorinda	Kelly, Colleen	kelly, Lynn	kelman, adrianna
Kemple, Jason	Kennedy, Sara	Kenny, Bonnie	kensinger, kim	Kent, V	Kerns, Loretta
Kerr, Jessie	Kerr, Peter	Kerridge, Kathy	kessler, brian	Kessler, Robert	kestell, kathy
Kester, Lenore	Keup, Astrid, Theo, Jonathan, Julius	keys, catherine	Keys, Elsie	khandekar, ketan	Kidd, Carlotta
Kiernan, Elizabeth	Kiesling, Jonathan	Kilcher, Andrea	Kilgore, Susan	Kindred, Rebecca	KIng, Barbara
King, Janis	King, Michael	King, Serina	King, Susan	Kinge, Heloisa	Kinsman, Judy
Kirby, Claire	Kirschbaum, Saran	Kirschling, Karen	Kirwan, Kevin	kite, richard	Klapsic, Maja
Klass, Naomi	Klausing, Michael	Kleen, Laurie	Klein, James	Klein, Lorraine	Klein, Marilyn
klerer, leona	Kliche, Diana	kljuce, maria	Klock, William	Klopp, Basey	Klosterman, Pete
Klug, Frank	Klugiewicz, Mark	Klusaritz, Thomas	Knapp, Virginia	Knight, E M	Knight, Mark
knodle, marjorie	Knopp, Kristeene	Knoppers, Sherry	Koch, Veronica R	Koechner, Donna	koeck, diana
Koehl, Lisa	koehler, carol	Koeninger, Laura	Kohl, Teresa	Kok, Richard	Kolbe, Carol
Kolomietz, Irina	Kondreck, Janine	koningsberger, erik	koo, rebecca	Kopshever, Jonathan	Koritz, Mark
koritz, Raleigh	Korn, Meryle A.	Kornbluh, Martin	Kornbluth, Georgia	Korner, Naomi	Koschinski, Sven
Kosec, Dawn	Kosowicz, Aleks	Kostina, Ekaterina	Kostis, Steven	Kostis, Steven	Kovich, Jenni
Kowalska, Marta	Kozinski, Susan	Krall, Michael	Kramer, Merrill	Kramer-Dodd, Gay	Kramer-Smith, Lara
Kranowski, Steven	Kraus, Marion	Kraus, Patricia	Krause, Doug	krause, fayette	Kraynak, Ed
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Kruschwitz, Vicki	kruse, marilyn	Kuehn, Nicole Jeniffer	Kuge, Donna	Kuhlman, Lewis	Kulp, Jeff
Kummer, Karen	Kurach, Sharon	Kurtz, Christy	Kurz, Don	Kuzma, Laura	kyes, karin
L, D	L, K	l, k	L, Paul	La Serra, Stephen	Laakaniemi, Karen

Labadie, Dante	Labey, Georgia	Lackey, Mercedes	Ladoue, Adeline	LaFlamme, Jeff	LaFontaine, Paul
LaGesse, Rebecca	Lahm, Brenda	Laieski, Caleb	Laiti, Jared	Lama, Stacey	LaMarre, Michael
lamb, brian	Lambeau, Catherine	Lambert, Kay	Lambert, Rick	Lambeth, Larry	Lamons, Kristina
Lamy, Chantal	Lamy, Chantal	lancman, deborah	Landi, Dennis	Lange, Marlena	langford, sharon
Langham, Loraine	lanning, alessa	Lanskey, Marcus	Lanzl, Catherine	laplante MD, sharron	LaPointe, Drena
Lapointe, Kenneth	LaPorte, Candace	LaPorte, MIke	Larger, Mandy	Larivey, Dan	Larkin, Samuel
Larsen, Karen	LaRue, Erik	Lascoue, Lillith	Lashbaugh, Benjamin	lasorsa, maria	Latta, George
Latta, Sharon	Lau, Barb	Lauritzen, Savannah	Lautner, Sharon	Lautner, Sharon	Lavender, Shell
Lavish, Jessica	Lavy, Fred	Lawler, Sandy	Lawnicki, Tim	Lawrence, Jim	Lawrence, Katherine
lawrence, sharon	Lawrence, Suzy	Lawrence, Vinnedge	layton, jean	layton, jean	Lazarus, Maya
Lazell, James	Le Beau, Josette	LeClair, Peg	lee, brenda	Lee, Christopher	Lee, Hyun
Lee, Richard	Leffler, Mark	Lehmann, Tanja	Leiva, Miranda	Lekkas PhD, Demetrios E.	Lemke, Linda
lenhart, Phoebe	Lenz, Andrew	Leon, Laura	LePain, Andrea	Lepore, Paula	Lerner, B.
Lerner, Michelle	LeRoy, David	lesmond, michelle	Leszczynski, M	LeValley, Lon	Leven, Marie
Levine, Sandy	Levinson, Elana	Lewis, Erma	Lewis, Erma	Lewis, Erma	Lewis, Jim
lewis, sharon	Lewis, Sherry	LIBERGE, MARCEL	Liebman, Caren	Liechtenstein, K. Emmeram	Liedike, Robert
Liggio, Eleanor	Lilith, Ms.	Lim, Olivia	Lima, Christopher	Lin, Ching-yi	Linarez, KJ
Lincoln, Deb	Lincoln, Deb	Lindberg, Ake	Lindberg, Scott	Linder, Patty	Lindgren, Jean
Lindsay, Johanna	Linehan, Victoria	Linhares, Claudia	Lininger, Steve	Linn, David	Lionetti, Marc
Lipinski, Anneliese	Liscomb, Robie	Little, Sharon	Livingston, Elaine	Ljusic, Dostana	Llinas, Stephanie
Lockett, Jennifer	Lockhart, Jack	Lockwood, Tracy	Loewer, Vera	Loftin, Nancy	Loftin, Nancy
logan, s	Lohr, Krista	Lombardi, Robert	Long, Debotah	Long, Laura	Longo, Stephanie
Longyear, Sharon	Loo, Chris	Loomis, Margaret	lopez, covi	Lopez, Iliana	Lopez, Jose
Lord, Christopher	Lorenz, Bettina	Lorig, Constance	Losonczi, agnes	Louchard, Lorrell	lough, janet
Love, Gloria	Lowe, Frank	Lowe, Kimberly	Lowe, Margot	Lowe, Paige	Lowell, Nancy
Lowell, Sally	Lowery, Candice	Lowery, Carl	Lowry, Kristen	Lowry, Lorraine	Lozoraitis, Susan
Lucas, Addie	Lumley, Harry	Lunde, Nils Anders	Lundeen, Bill	Lundquist, John	Lupori, Stacy
Luu, Jane	Luzier, Maresa	Lyda, Mary	Lynch, Cindy	Lynley, Lauren	Lynn, Pam
Lynton, Ronken	Lyons, Lorne	Lyons, Sarah	Lysne, Gerald	Maarouf, Simone	Macan, Catherine
MacConaugha-Snyder, Morgan	MacDonald, Ethel	mace, pat	Mack, Joanne	Mackiewicz, Frances	Mackinnon, Bonnie Lynn
MacLaren, Kathleen	MacLeod, Dianna	Macomber, Jessica	MacRaith, Bonnie	MacWaters, Laura	Macy, Michelle
madden, sue	MADOLE, GARY	Magliola, Lawrence	Magrath, Pat	mags, j	Mah, Albert
Mahony, Debra	Mair, Pat	Makarenko, Vladimir	Mallet, Hector	Malmid, Wendy	Malone, Annie
malone, evelyn	Maloney, Lisa	Mamut Sosa, Valentina	Manda, Mark	Mandell, Sheila	MANGIO, ROSANNE
Mangus, Tracey	Mann, Kaye	Mann-Hielscher, Galia	Mapes, Jenny & David	marcus, mel	Marienau, Suzanne
Markert, Lynn	Markham, Craig	Marousek, Beth	MARQUES, julie	Marr, Rhonda	Marrs, Cynthia
Marsala, Joe	Marshall, Raymond	Marshall, Stephen	Martens, Chrys	martens, linda	Martin, James
Martin, Julie	Martin, Nancy	MARTIN, Noelle	Martin, Richard	Martin, Rodney	Martin, Samuel
martinengo, silvia	Martinez, Angela	Martinez, Rafael	Martini, Denise	Martinotti, Silvia	masarati, piero
Mason, Barbara	Mason, Elliot	Massaro, Sherry	Masse, Kierstin	Massell, Bec	Masser, Joel
Massey, Linda	Masson, Jill	masters, susan	mastri, francis	Mastro, Cynthia	Mastrototaro, Domenico
Matasick, Marcy	Mathews, Holger	MATTHEWS, CLYDE-LINDA	matthews, sam	Mattingly, Georgia	Mattison, Priscilla
Mauk, Barbara	Maust, Jean	maxfield, casee	Maxwell, Catherine	May, Paul	Mayer, Karen
Mayer, Karen	Mayer, Paul	Mayo, Nan	Mayotte, Mark	Mays, Teresa	Mazzola, Lisa
McAlister, Kevin W.	McAskill, Sophia	McCall, Jan	mccall, tyler	McCarthy, Amy	McCarthy, Debbie
McCarthy, Paul	McCarty, Chris	Mccaughey, Linda	McCauley, Maureen	McClure, James	McClure, Kate
McCollim, Jeff	McConnell, Kelly	McCreary, Jan	McCrossin, Kristin	McCumber, Peter	McCurry, Sally
McDonal, Frances	McDonald, Mary Ann	McDonough, Janet	McDonough, Rebecca	McEachronTaylor, Linda	McFarland, Janette
McGeehan, Carol	McGough, Alice	McGovern, Julia	mcgrath, michael	McGregor, Hilary	McGuire, Ellie
MCHUGH, PATRICIA	McIntosh, Vibella	McIntosh, Vibella	McJunkin, Diane	McKee, Edythe	McKee, Lary
McKee, Richard	McKenna, Louise	McKenzie, Valerie	McKeon, Amy	McKeon, Julie	McKillip, Linda
McKim, Tina	McKinney, Kathryn	McLemore, Alan	McLuckie, Sandra	McMahan, Michael	McMULLEN, COLLEEN

McNaull, Sarah	McNeil, Kerry	McPherson, Kay	McWilliams, Cynthia	McWilliams, Erica	Mead, Margaret L
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Melton, Alyssa	Meltzer, Rachel	Menauge, Danielle	Mendelsohn, Cal	Mendes, Desiree	Mendes, Diana
Mendez, Virginia	Mendieta, Vince	Mendousa, Anthony	Menefee, Mendi	Mercurio, Arlene	Merljak, Julija
Meroni, Adele	Merrill, Dick	mesa, eulalia	mesa, eulalia	mestre vicedo, maria magdalena	metcalf, a
metcalf, a	Metz, B & J	Metzger, Carol	meuer, Rita	Michaels, Brenda	Michel, Joan
Mick, Rick	Mick, Rick	Middleton, Amber	mielke, jeanine	Mikalson, Amanda	miler, Catherine E
milford, joan	milford, joan	Milione, Regina	millay, mary ann	Miller, Carol	Miller, Catherine
Miller, Deborah	Miller, Debra	Miller, Dennis	Miller, Dennis	Miller, Dianne	Miller, Glenn
Miller, Jennifer	Miller, Joan	Miller, Ketty	Miller, Melanie	Miller, Rebecca	Miller, Robert
Miller, Ruth	Miller, Sheila	Miller, Susan	Millick, Monte	Mills, Lesia	Milnes, Matthew
Milonas, Nikolaos	Miner, Laurie	Mink, Daniel	Minkus, Carol	Misicka, Ed	Mitchell, Jan
Mitchell, Kristina	Mitchell, Lee	Mitchell, Robin	Mitose, Kazuko	Mitros, Gosia	mitteldorrf, harriet
mitteldorrf, harriet	Mitton, Darren	Mitu, Ioana	Mixter, Jean	mizak, cheryl	Mizell, Michael E.
Mock, Carol	Moderacki, Deidre	Mohning, Kathleen	Molloy, Mark	Molnar, Daniela	Monaghan, Dina
Mondazze, Gina	Monfette, Aggie	Monical, Janet	Monroe, James R	Montague, Susan	Montague-Judd, Danielle
Montalvo, Patricia	Montanari, Margherita	montapert, anthony	Monterisi, Mariangela	Montero, Deborah	Moody, Janis
Mooney, Linda	Moore, Alex	Moore, Barbara	Moore, Debra	Moore, Jeannine	Moore, Nancy
Moore, Pauline	moore, tony	Mora Black, Tayira	mora, sharon	Moraiti, Vicky	Moran, Judy
moreno, dolores	Morgan, Alecia	Morgan, Alexa Joy	Morgan, Edward	Morgan, Susan	Morgan-Hickey, Diana
morris, catherine	Morris, Kathleen	Morris, Megan	MORRIS, PEGGY ROSE	Morris, Sharon	Morrison, Donald
Morse, Sarah	Mosca-Clark, Vivianne	Moss, Paul	mothley, drucilla	Motteler, Catherine	Mouldin, Melissa
mouton, janice	Moynahan, Susan	MRKVICKA, EDWARD G.	MuÃ±oz, Laura	MuÃ±oz, Laura	MuÃ±oz, Laura
muccia, diane	Mueller, EK	Muetzel, Beth	Mugglestone, Lindsay	Mulcare, James	Mulder, Linda
Mullen, Charles	Mumaw, Clayton	Mumford, Heidi	Mundaca, Joseph	Mundaca, Joseph	Mundal, Sarah
munoz, giannelli	Munton, Chris	Murakami, Maki	Murdock, Lauren	Murningham, Patricia	Murphy, Andy
Murphy, Dacia	Murphy, Daniel	Murphy, Lucinda	Murphy, Michelle	Murray, Craig	Murray, Cristy
Musgrave, Drew	Musialowski, Monique	musso, annunziata	Myers, Carol	Myers, David Russell	Myers, Keli
Myers, Linda	Myers, Sonya	Myhre, Paul	NÃ¼hrich, Paulo	Nadreau, Patricia	Naegele, Alice
Naples, Jean	Naranjo, Arlene	Nardell, Jason	Narigon, Amelia	Narmour, Michelle	NASH, HEYWARD
NASH, HEYWARD	NASH, HEYWARD	NASH, HEYWARD	Nathan, Janice	Navran, William	Neckebroeck, Anne-Marie
NEFF, GRACE	Neihart, Janet	Neihart, Joanne	Neill, Shirley	Neimark, Debbie	Nelson, Brad
Nelson, Dorothyb	Nelson, Kathleen	Nelson, L	Nelson, Lynne	nemeth, garry	Neste, Lisa
Neste, Lisa	Nestor, Mike	Nettleton, John	Netzel, Forrest	Neuber, Christa	Newberry, Roxie
Newbry, Dakota	Newman, Connie A.	newmark, michelle	Nicholes, Heidie	Nichols, Jason	Nichols, Stephen
Nicol, Robin	Nicolai, Nicola	Nidess, M.D., Rael	Niedermayer, Pam	Nielsen, Antonella	Nieman, Kimberly
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nottingham, lois	NovÃ¡kovÃ¡, Kate?ina	Novack, Aaron	Novelo, Cristina	Novo, Emilia	nowak, joseph
Nowak, Joseph	Nuccio, Edwina	Nuccio, Edwina	Nuccio, Sue	Nuccio, Sue	Nuesch, Raymond
Nuesch, Raymond	Nunemaker, Connie	Nunez, Louisa	nylen, eric	o, k	Oaster, Jane
O'Brien, Floyd	OBrien, Kelly	OBrien, William	Och, Evelyn	O'Clair, Charles	oconnor, shari
Ocskai, Barbara	Odanaka, Jack	Oerke Jr, Carl	Oggiono, Nanette	Ohlin, Sanna	Okina, Kunihiko
Okulewicz, Kathy	Olch, Karen	Oldham, Kevin	Olenick, Roberta	OLIVER, BRUCE	Oliver, Jenny
oliveria, sheelagh	Olmez, Justine	Olmstead, Scott	Olsen, Corey E.	Olsen, Loretta	Olson, Jeffery
O'Neil, Nicole	Oppenheim, Benjamin	Oppenhuizen, Kathy	Orona, Angel	Orosz-Coghlan, Patricia	Orozco, Angela
Orshan, Carol	Osborn, Jerrold	Osborn, Julie	Osborne, Phil	Osborne, Stacey	Oshiro, Alex
Osland, Rhea	Ostrer, Allison	O'Sullivan, Katherine	O'Sullivan, Rita	Ouellette, Marcia	Ovalle, Rosendo
Overby, Gary	Overton, Steve	Owen-Evans, Michael	p, Janice	P. de Held, Diana	Pacheco, Ricardo
Packer, Patti	Padelford, Grace	Padilla, Melania	Pafumi, Catia	pagano, maria	Pagel, Andrew
Palacky, Tami	Palestina, Briana	Palla, Paul	Palladine, Michelle	Pallanes, Beatriz	Panko, John
Paoluzzi, Sara	papandrea, john	Pappano, Allie	Parcevaux, Christine	Pardi, Marco	PARKE, MELINDA
Parker, Caylee	Parker, January	Parks, Ed	Parlevliet, Leotien	Parrish, L.	Parsley, Adina
Parsons, Jeff	Parvela, Heidi	Pasichnyk, Richard	Pasqua, John	Pastula, Adam	patel, sarosh

Paterson, Chris	Patton, David and Therese	Payette, Sarah	Payne, Grace	Payne, Heather	Payne, Jennifer
pearce, chris	Peattie, Ava	Pech, Jim	Peck, Karin	Peddicord, Shelly	Pederson, Angela
Peltze, Alan	Penrod, Dolores	Penton, Toni	Peranio-Paz, Giana	Perego, Fabio	Perez, Aldora
Perez, Margaret	Perinchief, Jana	Perkins, Joel	Perkins, Penny	Perricelli, Claire	Perron, P.
Person, Wayne	Peskin, Laura J.	peter, judith	Petermann, Janet	Peters, Gene and Dori	Peters, RAY
Peters, Thom	Peterson, Barbara	Peterson, Davin	Peterson, Diane	Peterson, Kim	Peterson, L.
Peterson, Nicole	Peterson, Robin	Peterson, Susan	Petitt, Denis	Petrak, Thanice	Petro, Pat
Petrone, Cheryl	petrulias, linda	Petrus, Veronica	Petteway, Sue	Petty, Jessica	Petty, Robert
Peyser, Victoria	Peyser, Victoria	Pfeffer, Jo	Pfeifer, Nezka	Pfeiffer, Pat	Phelps, Leslie
phenix, lisa	Philleo, David	Phillips, Barbara	Phillips, Charles	Phillips, Jan	Phillips, Joe
Phillips, Joseph	Phillips, Kathie	Phillips, Regina	Phipps, Catherine	Pichel, Vanna	PIDGEON, SANDRA
Pieniazek, Annette	Pierce, Allison	Pierce, Elin	Pierce, Tanya	Pierson, Julie	Pierucki, Gatha
Pinkerton, Anne	Pinto, Juliann	Pirazzi, Tina	Pitman, Tom	Pittea, Chetna	Pittman, Jennifer
Pitts, Shannon	Plamondon, Andrea	Platizky, Franklin	Plishka, Debra	Ploger, Scott	Pochat, Louisette
Poche, Brieaux	podleski, jeremiah	Pollard, Bev	Polley, JoAnn	Polsky, Diana	Polycranos, Jordan
Pomeroy, Randolph	Ponchot, Susan	Poncia, Beverly	Pond, Christopher	Poole, Andrea	Pooler, Carole
Popodi, Ellen	Port, M	Portale, Lisa	Porter, Bernadette	porter, candace	Porter, Kathleen
Porter, Sheryl	Post, Lara	Post, Timothy	Potter, Doris	Potter, Doris	Potter-Smith, M
Poulsen, Barbara	Poulson, Judi	Powell, Elizabeth	Powell, George	Power, Christina	Power, Matthew
Powers, Eve	Powley, Carol	prentiss, alex	Preston, Lynne	Preuss, Ginnie	prevost, jennifer
Prexl, Esther	Price, Brenda	Price, Charlotte	Price, Mary	Price, Michele	Price, Michele
Priebe, Matthew	Priskich, Fiona	Probes, Lawrence	Proteau, Mary	Pruett, Oakey	Pryich, Ann
PSICHOGIOS, ATHANASIOS	Puc, Rob	Pulcini, Andrea	Punneo, Sheryll	Purbrick-Illek, Sally	Putnam, Alethea
putrich, steve	Puza, A	QUAGLIA, Viviane	Quarrick, Robert	Quigley, Louise	Quilenderino, Yvonne
quillin, michael	Quinn, Tom	Qurashi, Sheeza	Raabe, Karen	Rabinowitz, Rebecca	Radford, Lena
radko, danuta	Raftery, Rita	Raganato, Alessandro	Raible, Annette	Raich, Peter	Raichart, Doraine
Railey, Bob	rajan, sara	Ralph, Karin	Ralston, Aron	Ramaker, Julianne	Ramini, Deborah
Ramirez, Carmen	Ramirez, Jessica	Ramos, Joann	Ramos, Mary	Randolph, Anne	RAngel, Louise
Ranstrom, Patricia	Rapp, Lauren	Rappaport, Alexandra	Rappe, Leonard	Rasbury, Patricia	Rasbury, Patricia
rasmussen, margaret	Rastro, Anthony R.	Ratan, Meh	Rauch, Sequoia	Rausch, Mary	Rauworth, Steve
Raven, Jackie	Rawling, Doug	Raychaudhuri, Sumana	Rayhill, Ashley	Raymond, Amanda	Rea, Linda
Ream, Tarn	Reback, Mark	Redden, Denise	Redding CPA, Linda	Redman, Sandi	Reeder, James
REEL, JOSEPH	Reeves, Lenore	Reginato Jr, Louis	Rego, James	Rego, Sonia	Rehberger, Lena
Rehnke, Eric	Reichard, Tim	Reichert, Robyn	Reid, Jena	Reiher, Jean	Reinfried, Kay
Reinhart, Gabriele	Reinhart, Paul	Reinman, Fred M.	Reiser, Katharyn	Remahl, Ulf	Remesch, Thomas
Rennacker, Ann	Replogle, Frederick	Restelli, Simone	Retes, Fred	REVESZ, BRUCE	Revilla, Oscar
Reynolds, Brian	Reynolds, Dianne	Reynolds, Elizabeth	Reynolds, Jamie	Reynolds, Lisa-May	Rhodes, Janet
Rhum, Madeline	Riccs, Bonnie	Richard, Nadine	Richard, Nancy	Richardson, Joan	richardson, peggy
richardson, peggy	Richardson, Peter	Richman, Bruce	richmond, lonna	Richter, Mark	Riddle, Amy
Riddle, Carolyn	Ridgway, Kathi	Ridley, Donna	Ridolfo, Angela	riger, richard	Ringgaard, Line
Ringle, David	Rings, Sally	Rising, Melanie	Rivera, Emma	Rivera, Janice	Rivera, Janice
Rizzi, Gaetano	Robbins, Jack	Robege, Manon	Roberson, Tamela	Roberson, William	Robert, Claude
Roberto, Rob	Roberts, Laney	roberts, les	Roberts, Martyn	Robertson, Larry And Barbara	Robertson, S.
Robinson, Cathy	Robinson, Jacqueline	Robinson, Janet	Robleda, Rosa Maria	Rocca, Mary	Rocha, Candace
Rocha, Candy	Roche, John	roche, maureen	Roche, Sue	Rodack, Soretta	Rodriguez, M
rodriguez, manuel	ROEDER, MERI	Roeffen, Christine	Rogers, Karen	Rohloff, Rosalyn	Rokas, John
Rol, Anna	Rolfes, Kevin	Romberger, Cynthia	Romer, Elke	Romero Villanueva, Sonia	Romo, Donna
Rooney, Diane	Rosa-Re, Samantha	Rose, B.	Rose, Jay	Rose, Kathryn	Rose, Shanna
Rose, Sheryl	Rosemeyer, Jere	Rosen, Barbara	Rosenberg, Pauline	Rosenblum, Stephen	Rosenkotter, Barbara
Rosenthal, Douglas	ross, audrey	Ross, Pat	Ross, Robert	Rossin, Linda	Rossing Angeltveit, Andreas
Rotcher, Michael	Roth, Steve	Rothauser, S	Rothermel, Rose	Rouse, Rena	Rousseau, Karline
roussell, pam	Routh, Jeffrey	Row, Suzanne	Rubalcava, Angelic	Ruby, Kenneth	rudin, lee
Rueckert, Cornelia	Ruiz, Jackie	Rule, Juliann	Rulli, Nicholas	Ruopp, Kathy	Rupert, Greg

Rupp, Nancy	Rupprechter, Renate	Rush, Charlene	Russick, Sharon	rutenburg, irina	Ruthroff, Katharine
Ryan, Natalie	Rybka, C.T.	s, c	s, d	SÃ©villa, Caroline	sacco, donye
Saglietto, Eve	Saleh, Nour	Salerno, Mary	Salerno, Suzanne	salgado, natasha	salgado, natasha
Salvner, Amanda	Samp, Cecelia	Sanchez Franck, Angelita	Sandoval, Deborah	Sandretto, Laurie	Sandritter, Ann
Sanford, Tracy	Sanstrom, Alice	SANSTROM, VALLI	Santerre, Gay	Santerre, Gay	Santos, Eloy
Santos, Saskia	Santto, Aldana	Sarabia, Michael	Sasaoka, Julie	Sattur, Bethany	Sauerhoff, Robb
Saunders, Leigh	Saxon, Rachel	Sayers, Lois	sbonek, jeff	Scaglia, Katia	Scarlata, Rachel
Schaedig, Terry	schaefer, nathan	Schaefer, Sarah	Schaming, Carol	Schaut, Matthew	Schedler, Ginger
Scheiderer, Heather	Schenfisch, Janice	Schildwachter, Steve	Schlapfer, Edwin	Schlatter, Jeanne	Schleifer, Douglas
Schlemel, Pierre	Schlippert, Glenn	Schloessinger, Fred	Schloss, E.S.	Schlosser, Olivia	SCHMID, MARA
Schmid, Sarah	schmidt, diana	Schmidt, Justin	Schmiedlin, s	schmitz, carolyn	Schmitz, Christiane
Schneider, Edward	Schneider, Lucy	Schnip, Keith C.	Schoech, D	Schonewolf, Jack	Schott, Joe
Schrauger, stewart	Schreiber, Linette	Schreier, Bryna	Schuhrke, Nancy	Schultz, Anneliese	schultz, jennifer
Schultz, Michael	Schultz, William	Schumacher, Amy	Schwacke, Theresa	Schwartzman, Henry	Schwarz, Kurt
Schwarz, Marcia	Schwarz, Robin	Schwarz, Robin	Scognamiglio, Antonio	Scott, Jennifer	scott, laura
Scott, Marilyn	Scott, Wenona	SCOTTO DI FREGA, MARIA PIA	Scoville, P	Scribner, Denee	Scrima, Lawrence
Scriptunas, Judy	SEATHER, LINDA	SEBASTIAN, ROBERTA	Seely, Clover	Seewester, Frank	Sefiane, Claire
Seifert, Lisa	Sellers, Jennifer	Sellers, Margaret	Sellers, Robert Dale	Selph, Sarah	Seltzer, Devon
Selva, Stefania	Selva, Stefania	Sennello, Patrick	Senour, Jon	serban, afi	Sercombe, Sarah
Sewald, Michelle	Sexton, Elizabeth	Sfeir, Lisa	shabbott, mary	Shafer, Irina	Shaffer, Candice
Shaffer, Nicole	Shaia, Gerald	shalev, nadav	Shallman, Elsy	Shanker, Gopal	Shannahan, Richard
Shaouy, Pam	Sharak, Nancy	Shardo, Judith	Sharer-Price, Julie	Sharp, Donna	Shaub, Kimberly
Sheaffer, Chuck	Sheahon, Colleen	Shed, Francene	Shelton, Donna	shepard, rebecca	Shepherd, Marion
Sherman, David	Sherman, Kara	Shero, Dale	Sherrill, Robyn	Sherry, Lori	sherwood, america
Sherwood, Dan	Shiels, Theresa	Shifrin, Diane	Shike, Mina	Shimata, Kathy	Shimshin, Yael
Shippee, Robert	Shively, Judy	Shomer, Forest	Shores, Meredith	Short, John	Showers, Merle
Shulof, Vicki	Shuman, Tecari	Shuster, Mrguerite	Sichert, Verena	Sidbury, Mercy	Siddique, Omar
Siebe, Nikki	Sieck, Marilyn	Siegrist, Toni	Siler, Samantha	Silva, Hector	Silva, Welthy
silver, margaret	silver, ron	Silvey, Kathy	Simmons, Timothy	simone, denise	Simurro, C.
Sines, Charlotte	Sivro, Sarah	Skalland-Mills, Melinda	SKINDZIEL, DAWN	skinner, barbara	skirvin, laurence
Skolnick, Kate	Skopek, Judy	Slattery, Louise	slauson, kevin	Slemp, Peggy	Sloat, Dale
Sloat, Jan	Small, Cynthia	Smarr, Todd	Smile, Serenity	Smith, Anna	Smith, Bradley
Smith, Brittany	Smith, Brooker	Smith, Denise	Smith, Donna	Smith, Emily	Smith, Eric
Smith, Harold	Smith, Holly	Smith, J.T.	Smith, Janell	Smith, Janet	Smith, Jeannie
Smith, Jennifer	Smith, Judith	smith, kathy	Smith, Keelan	Smith, Lisa	Smith, Mallie
Smith, Ryan	Smith, S.	Smith, Tanner	smolen, michele	Smythe, Richard and Mary	Snell, Barbara
Snider, Jay	Snider, Ronda	Snyder, Lori	Snyder, Robert	Snyder, Tamatha	Snyder, Valerie
soares, maria	Sodfried, Bianca	Sola, Mikel	Solomon, Richard	Solyom, Szilvia	Somers, Jeff
Songan, Ian	Sonin, John S.	Sopher, Nancy	sophia, Tristan	Sorensen, Doug	Sorkin, Marshall
Sorrell, Grant	Soucie, Maija	Soule, Craig	Souza, Joan	Souza, Mike	Sovey, Marjorie
Spanski, Linda	Sparlin, Shauna	Spates, Georgeanne	Speed, Janice	Spence, Liter	Spencer, Deborah
Spencer, Susan	Spotts, Richard	Spragett, Eric & Cedra	Sprehn, Jessica	Springer, Sarah	Spurlock, Katie
Squire, Julie	Squires, Kathi	Stahl, Charlotte	Stan, Mihaela	Stanback, Fred	Stang, Petra
Stange, Elizabeth	Stansbury, Katherine Anne	Stansfield, Jack	Stanton, Joan	Stark, Chester	Starzman, Robin
Stauffer, Lynda	Stay, Chris	Steadmon, Jason	Stedman, Donald	Steele, Mary	Steele, Ph.D., William
Steenbergen, Jeff	Steil, Ashleigh	stein, claudia	Stein, Herbert	Stein, Renee	Stelma, Michol
Stelzer, Marsha	Stennes-Rogness, Suzanne	Stephens, Chandra	Stephenson, Jennie	Stern, Les	Stern, Richard
Stern-Eilers, Estelle	Steven, Kathleen	Stevens, Mary	Stevens, Wendy	Stevenson, Joey	Stewart, Betty
Stewart, Bob	Stewart, John	Stewart, Sarah B	Stieber, Frank	Stiles, Sheri	Stillwell, Lyda
Stocker, Ann	Stockton, Richard Lee	Stoeferle, Claudia	stokes, lynne	Stone, James	Stone, Lisa
Stonebraker, Brad	Stonecipher, Rob	Stonehawk, Mika	Stoner, Dorothy	storrs, andrea	Stoyas, Colleen
Strain, Judy	Stratton, Bill	Strong, Grace	Strothkamp, Kenneth	strouse, wp	Stuart, Michael

Stuart-Jennings, Erin	STUCKEY, MARCI	Stufflebeam, J	Stuhaan, Sandy	Stultz, Alan	suarez, melissa
Sullivan, Karen	Sullivan, Margaret	Summer, Indigo	Summer, Rebecca	Summers, Jess	Sunfire, Michael
surface, loretta	Sutherland, Shari	Sutton, G.	Svendsen, Kathy	Swaim, Lauren	Swanson, Charles
Swanson, J	Swanson, Robin Rae	Sweeney, Dennis	sweetling, william	Swenson-Zakula, Kimberly	Swers, Arthur
Swiatkowski, Ray	Swiger, Michael	Swineford, Rhonda	Swing, Carol	Swoveland, Maury	Syperda, Laura
Szablewski, Conrad	Szydlowski, Marilynn	Taggart, Carol	Taillade, Line	Taimi, Kathleen	Tait, Ann
Takaro, Mark	Takush, Kathie E	Talavdekar, Rutvij	Tamargo, Jorge J	Tango, Romeo	Tanoury, Mary
Taratula, Alec	Taroli, Garry	Tarpley, Matthew	Tate, Laurel E.	Tauson, Chris	Taylor, Barbara
Taylor, Colin	taylor, donald	Taylor, Elizabeth A.	Taylor, Joan	Taylor, Kim	Taylor, Kirk
Taylor, Ricky	Taylor, Sarah	Taylor, Stefan	Tedesco-Kerrick, Terry	Teevan, John	Temple, Michele
Teng, Deborah	Terrill, Lynn	Terry, Joanne	Terry, Michael	Thayer, Jeff	Theobald, George
Theobald, John	Thibodeau, John	Thieke, David	Thielen, Joanne	thigpen, alice	Thollaug, Julia
Thomas, Carolyn	Thomas, Debbie	Thomas, Joanie	Thompson, Bethany	Thompson, Carol	Thompson, Carrie
Thompson, Jennifer	Thompson, Keith	Thompson, Linda	Thompson, Natalie	Thompson, Thomas	Thompson, Todd
Thryft, Ann	Thurairatnam, Susan	Tice, Janet	Tice, Janet	Timmins, M	Tobias, Alice
Tobin, Dan	Toigo, Joe	Toledano-DeMars, Andrea	Tomalty, Dr Nansea	Tomaszewski, Melissa	Tomczak, Bartlomiej
Tomlinson, Barbara	toro, tom	Toth, Jennifer	Towner, Erline	Tran, Dat	Tran, Dat
Tran, Sheila	Traniello, Francine	Trapp, Gene R.	Trask, Abigail	Trauger, Adam	Traum, Norman
Travis, Terence	Trenchard, Thomas	Trevillian, Linda	Tribble, Peggy	Trice, Tina	Trickett, Barbara
Trojakova, Olga	Trudeau, Stephanie	Tryggeseth, Jackie	Tucker, Karen	Tull, Robert	turicchi, kelly
Turk, RN, Lawrence	Turner, Paul	Turner, Phyllis	Turrentine, Rogers	Twist, Shannon	Tyler, Jonathan Piers
U. family, The	Ucko, Aaron	uh, pepa	Unger, Pamela	uppgaard, heidi	Urbain, Mireille
Uribe, Gloria	Utzinger, Mia	Vacek, Doug	Vakili, Mehdie	Valencia, Suzanne	Valentine, Jennifer
Valentine, Karen	Valero, Maudie	Valerugo, Katherine	Vales, Audrey	Vallejo, Carol	Van Alyne, Emily
Van Bryce, Gabriole	Van den Meersschaut, Annie	Van Gilder, Lynn	van lear, tom	Van Leekwijck, Natalie	Van Mieghem, Eva
van Tol, Gerard	van Tol, Maud	van Tol, Maud	Vander Motte, Christiane	Vanlandingham, Mike	vantalon, serge
Varanitsa, Oleg	Varcoe, Donna D	Varcoe, Donna D	Vardan, Charlotte	Varga, John	Vargas, Marian
Vartabedian, Pia	Vaughan, Steven	Vaughn, Christie	Vaught, Kevin	Vaupel, Ilona	vayu, satya
Vecchiotti, Dorothea	Vega, Alejandra	Velarde, Mario	Velez, Sue	Veloo, Uma	Veloo, Uma
Veloo, Uma	Verbridge, Tara	Vermeulen, Martha	Verrill, Evelyn	Versenyi, Adam	Verzosa, Paul
Vesper, Paul	Vessicchio, Ssan P.	Vest, Martha	Vician, Doris	Victorioh, Ana	Vieira, Barbara
Vieira, Barbara	Vieira, Ed	Vieira, Ed	Viergutz, Julie	View, Kathleen	Villanova, Carolyn
Vinton, Janine	Vischulis, Jean	vitale, amelia	Vogel, Steven	Voland, V	Vollmar, Beth
Volz, Candace	von Abele, Melitta	Vorachek, Mary	Vyatchanin, Arkady	Vyhnal, Kristin	w, jand
W., M.	Waddington, Annette	WADE, FELICIA	Wade, Julia	Wadsworth, Andrew	Wagner, Carol C
Wagner, DJ	wagner, gary	Wagner, Scott	wahrman, mathew	Waleh, Hannah	Waleski, Mel
Walker, Brad	Walker, Charlotte	walker, david	Walker, Jason	Walker, Joan	Walker, Laura
Wallace, Robert	Wallach, Aleta	Wallach, Maya	Walls, Mary	walsh, ellen	Walsh, Jacqueline
Walsh, Jason	Waltasti, Marilyn	Walters, Donna	Walters, Ernie	Walters, Sandra	Wanamaker, Debra
ward, pam	Ward, Stacey A	Ward, Suzan	Wardlaw, Jessica	warfield, belinda	warfield, belinda
Warfle, Jamee	warner, mona	Warren, John Erkki	Warren, Kevin	Watchempino, L.	Waters, Anje'
waters, michael	Waterworth, Laura	Watkins, Kathryn	Watkins, Stefanie	Watson, Bonnie	Watson, Donna
Watson, Kathleen	Watson, Michael	Watson, Michael	watson, suzanne	Watters RPE,BCPP, Ann	watterson, nadine
Weatherly, Brooke	Weaver, Jenny	Webb, joan	Weber, Brenda	Weber, Lori	Wedow, Nancy
Weesner, Katherine	Wegener, Elfriede	Weiden, Cheryl	Weikel, Wendy	Weinberg, Larry	Weinberger, Deborah
Weinberger, Mark	weiner, mary ellen	Weingart, Robert	Weinstein, Casey	weiser, charlotte	Weisnicht, Michael
Weisser-Lee, Melinda	Weisz, Russell	Weldon, Wendy	Welland, P.	Wells, Christine	Wells, Lasha
Wells, R	Welsford, Susan	Welty, Fred	Wendel, Tom	Wenzel, Joseph	Wenzel, Tom
Werda, Spike	Wessels, Gertruida	Wessing, Diane	West, Alice	West, Kenneth	west, mr.g.
Westbrook, Janet	Westoby, Jacky	Wetteland, Signe	Weyand, Michael	Weyer, Diane	Wheatley, Allison
Wheeler, Maureen	Wheeler, Mike	Whisenand, Gretchen	Whitaker, Howard J	Whitaker, Inge	White, Beulah
White, Beulah	White, Charmaine	White, Jeffrey	White, Joseph	White, Lois	White, Nancy
White, Scott	whitehall, lee	Whiteside, Catherine	Whitfield, Jessica	Whitley MD, Mary	Whitlock, Gina

Wick, Carol	Wick, Kim	wickline, diane	Wiebenson, Sarah	Wiederhold, Joe	Wiener, Wendy
wiest, jo	WIKER, KEVIN	Wilburn, Pat	Wilke, Gail	Wilkerson, Jere	Will, Mary
Willet, Zoe	willett, kris	Williams, Jesse	Williams, Joseph and Diane	Williams, Rob	Williams, Rob
Williams, Sara	Williams, Terrie	williams, vicki	Williamson, Debbie	Wilsnack, Jonathan	Wilson, Debra
Wilson, Judith	Wilson, Robin	Wilson, Tracy	wilson, winn	wilton, liz	Wimberly, Chad
Windweh, Karola	Winfrey, Bobbiejo	Wing, Marjorie	winslow hanson, molly	Winter, Evi	Winter, Evi
Wisch, Anita	Wise, Steve	Witt, Kristen	Wittenbrader, Jason	Witzeman, Janet	Wojtkiewicz, Ewa
Wolcott, James L	Wold, Susan	Wolf, Martin	wolfe, jackie	Wolfe, Kathleen	Wolfe, Sarah
Wolfley, Debra	wolpe, corinne	Wontor, Debra	Wood, Barbara	Wood, Dian	Wood, Judy
Wood, Shelva	WOODS, BILLY	Woods, James	Woods, Rocquelle	Wool, Barb	Woolsey, David A.
Worley, David	Worth, Wendy	woudstra, gerrit	Wreford, Julie	Wright III, Trigg	Wright, Aura
Wright, Chadwick	Wright, Denise	Wright, Edmund	Wright, Katherine	Wright, Kathy	Wright, Madeline
Wright, Samantha	Wright, Sheila	Wright, Sheila	Wrightington, Nancy	Wullfsohn, Aubrey	Wunderlich, Eileen
Wunderlich, Eileen	Wushensky, Sharon	Wylie, Scott	Wyman, Jean	wyse, margo	Wyse, Sheila
xavier, marjorie	Y, Misa	yancey, robert	Yates, Joan	Yee, Dennis	Yee, Dennis
Yee, Dennis	Yellis, Stefanie	yenney, judy	Yeung, Alexander	york, lesley	Yost, Viviana
Young, Alan	Young, Darlene	Young, Rae	Young, Richard	Young, Richard	Z, Leah
Zachos Ligocki, Tatiana	Zagorski, Daria	Zainko, Sonia	Zalenski, Lisa	Zaltana, Flavia	Zaman-Zade, Rena
Zamudio, A.	Zavattero, Cameron	Zawaski, Joan	Zellmer, Kevin	zelmanovich, silvana	Zerr, Laura
Zielinska, Sylwia	Ziemann, Ilse	Zizza, Daniel	Zomer, Isabelle	Zoro, Piero	Zucker, Eva
Zucker, Marguery Lee	Zuefeldt, Mark	Zukoski, Katie	Zwar, Kurt		

FL14 ICL

Comment FL14-1

Natalie Chavez

Idaho Conservation League

Dear DOE and Hoquiam City Officials,

Please deny permits for the Westway and Imperium Terminal proposals. I am concerned for the safety of my community and for the health of our waterways if these oil terminal proposals go forward.

In North Idaho, trains that carry crude oil to Washington put our waterways at risk. The rail line runs alongside the Kootenai River, crosses Lake Pend Oreille and the Rathdrum Prairie Aquifer, a sole-source aquifer that provides drinking water for more than 500,000 people.

The trains run by schools and through downtown Bonners Ferry, Sandpoint and Rathdrum, Idaho, putting hundreds of people at risk on a daily basis.

Our communities don't have the funds to pay for overpasses or underpasses to help people avoid traffic congestion at railroad crossings. We expect to see more tragic accidents at crossings as the oil-by-rail traffic increases.

Our economies will suffer as this dangerous rail traffic increases because no one would choose to put their lives at risk by living near high-traffic industrial corridors.

Because of the enormous risks to our communities and natural resources along the rail route to Grays Harbor, I urge you to deny these permits.

Sincerely,

Response to FL14-1

Refer to the Master Response for Purpose and Focus of the EIS. Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport in the extended study area qualitatively

Table 7-23. Unique Comments Associated with ICL Form Letter

Commenter Name	Comment
Barcklay, Roderick	For the last 3 years I have lived within one mile and this last year within 300 yards of the BNSF main line. There are at least 6 major at grade crossings in or very close to Sandpoint. For safety reasons the trains slow to 25 miles or less per hour, occasionally stopping while to wait to access the trestle crossing the lake or to merge with an other busy track. In these long waits commercial vehicles must wait for the slow or stalled trains to clear the road. The worst case scenarios are times when a fire truck, ambulance or law enforcement must wait.
Response: Refer to Final EIS Section 3.16, *Vehicle Traffic and Safety,* for a description of impacts that could result from the proposed action on vehicle traffic and safety at grade crossings.	
Butler, Judy	I live in North Idaho along the rail route. My community does not have the ability to respond to an oil spill or accident. It is also imperative to preserve the health of our waterways. The rail line crosses Lake Pend Oreille at Sandpoint and runs alongside the Lake for miles between Hope and Pack River. It crosses the Rathdrum Prairie Aquifer, a sole-source aquifer that provides drinking water for more than 500,000 people, including my grandchildren.
Response: Refer to the Master Responses for Geographic Scope of the EIS and Emergency Response and Planning Gaps Evaluation.	
Flint, Stephan	The reality is that these "industrial corridors" are much wider than they were considered in the past. The project is really putting our local natural resources at risk in the long-term for a short-term gain.
Response: Comment acknowledged.	
Knapp, Ellison C	Please allow permits for the Westway and Imperium Terminal proposals with the conditions that financial help for traffic issues and accountability for safety of our natural resources a condition of the permits. Our communities don't have the funds to pay for overpasses or underpasses to help people avoid traffic congestion at railroad crossings. Maybe the railroad could subsidize the costs for these. Our economies are dependent on oil, coal etc. There needs to be a compromise with the energy industries. Safety and traffic help should be a priority for the trains.
Response: Comment acknowledged.	
Knudtsen, Karen	I have long been opposed to megaloads of oil being transported across North Idaho's pristine environment.
Response: Comment acknowledged.	

Table 7-24. Names Associated with ICL Form Letter

barcklay, roderick	barcklay, roderick	Benner, Juliana	bistline, Susan	blair, w	Blake, Frank
Bockino, Alida	Bowron, Alice	Bowser, Sue	Bowser, Sue	Brown, Ramona	Butler, Judy
C, Ellison	Carter, Janet	Clark, Matt	D'Aoust, Brian	Davis, Todd	Deemer, Susan
Dudley, Mary & David	Dunbar, Jane	duquette, pam	Flint, Stephan	Forsythe, Karen	Fragoso, Deborah
Fritz, Ronald	fuller, vistoria	Gilman, Greta	Goodman, Betsy	Goyden, Kay	Graham, Bill
Gregory, Alan	Griswold, Robert	Guerricabeitia, Jason	Heath, Rachel	heep, dave	Hendrickson, Borg
Huntley, Kathleen	Kaufman, Bruce	kean, susan	Knudtsen, Karen	Kreider, Tawn	Krummert, Bob
Larenas, Veronica	Larson, Linda	Linarelli, Ranirelli	Lockwood, Stephen	LockwoodVickyL, Vicky	Lynn, Sheelagh

McCall, Kerrin	Meeker, Jeff	Mullane, patti	Munro, Chris	Neumann, David	O'Connor, John
Olin, Bonnie	Oliver, Richard	Olsen, Andrea	Patton, Tim	Railsback, Kathryn	Rice, Jima
Ringler, Diane	Roberts, Muriel	Role, Nathaniel	Schmidt, Nancy	Schmidt, Nancy	Schmidt, Nancy
Scofield, Joan	Stanley, Georgie	Tanaka, Kathleen & William	Venard, Will	Ventre, Bill	Walker, Erick
Warren, Richard	Winer, Kenneth	Yost Hove, Kelly			

FL15 No Crude Oil

Comment FL15-1

Dear Hoquiam City Countil, Mayor Jack Durney, and City Manager Brian Shay:

Don't allow crude oil in Grays Harbor!

Our community can't afford an oil spill or explosion. The recent accidents across North America – from West Virginia to Ontario – show how dangerous it is to transport crude oil through our communities and over our waterways. These accidents have impacted people's drinking water, homes, schools, jobs, and even lives, as seen with the deaths of 47 people in the tragic Lac Megantic accident.

The three terminals being proposed in Grays Harbor are located in an earthquake prone area and a tsunami zone and the trains would have to travel through neighborhoods and along vulnerable waterways. The risk is too big.

Please keep our community safe and ensure that the terminal proposals in Grays Harbor do not move forward.

Response to FL15-1

Refer to the Master Response for the Purpose and Focus of the EIS.

For information about the analysis of tsunami and earthquake risks, refer to the Master Responses for Seismic Risk and Design Requirements and Earthquake Probabilities.

Table 7-25. Names Associated with No Crude Oil in Grays Harbor form letter.

Alberts, Judith L	Anderson, Landen	Anderson, Linda	Anderson, Rex	Anderson, Shane	Anderson, Warren
Andrews, Stephanie	Andrews, Susan	Armente, Heidi	Arriola, Morgane	Arvanitas, Kree	Asheley, Nancy & Bill
Atkins, Shelly	Atkinson, Jennifer	Ayers, Patrick	Bachtell, Candice	Badaluco, Dina	Ballard, Amy
Balmer, JoAnn	Bar-El, Pamela	Barhburst, Ross P	Barnwell, Rahi T.	Bartt-Geller, Bryce	Batker, Rafael
Bayliss, Bob	Becker, Rosanne E.	Beckley, Diane	Benhert, Kate	Bent, Julia	Berganto, Kim
Berge, Stephen D.	Bernthal, Tim	Berolzheimer, Jean	Bexten, Mary	Billhimer, Amy	Bisher, Michael
Bito, John	Black, David	Black, Joyce	Blackbern, Feanett	Blake, Katy	Bland, Dale
Blomgren, Sarahleigh	Bloomfield, Virginia	Bock, Linda P.	Boft, Bene	Boland, Brice	Bolton, Elizabeth
Bossard, Pete	Boulare, Cecelia	Brandt, Adam	Brandt, Thea	Brandt-Kreutz, Rick	Branlidt, Jenifer
Bremson, Roberta	Bremson, Victor	Britney, Samantha	Broack, Angela	Brooks, Rachel	Brott, Alex
Brown, Bailey	Brown, Paul	Brueher, Robert M.	Brunsell, Madison	Brutar, E.M.	Bryam Mocs, Sharon
Buchanan, D. Jean	Bundt, Awin L	Bundt, Mary Jane	Burns, Dan & Lorene	Byrd, Sonya	Caldwell, Steven
Campbell, Ken	Carley, Ron	Carnes, Shonna	Carrier, Kelly	Carrier, Mackenzie	Carter, Albert A.
Cemebich, Anthony	Chamberlain, Skye	Chanduroy, Ashok	Chappell, Lisa	Charderson, Mary Ellen	Christensen, Lia
Clabots, Barbara	Clark, Michael	Clebend, Billy	Cleland, Billy	Clena, Kar	Clereinen, Amy L
Cohan, Carl	Cohan, Linda	Conler, Anita	Connally, Michelle	Cool, Debbie	Cooper, Cathy

Corbin, Lance	Cortese, Diane	Crane, Benton	Criswell, Sara	Crouch, Susanne	Cummings, BJ
Curtright, Nicholas	Darity, Merry	Darry, Mike	Darsie, Jean	Dass Adams, Gordon	Davenport, Barbara
Daverie, Theresa	Daveyhertz, John	Davis, Jean	Davis, Kelly	Day, Jim	Dernates, Sandra
DeRosy, Elizabeth	Devine, Gerald	DeZorhn, Bob	Dixon, Sylvia	Docherty, Sharlet	Doherty, Jim
Dowels, Mary J	Dreicer, Ariel	Dudley, Stephanie	Dunning, Bill	Durham, Kelly	Durr, Greg & Becky
Eales, Tracy	Ebersole, Laurence	Edminston, K.	Edwards, Bethany	Edwards, M.D., David E	Elder, Heather
Elder, Kathleen	Elliot, Carla	Ellis, Liz	Emery, Howard	Enquist, Ellen	Erickson, Larry
Erickson, Randy	Estalilla, Francis	Expert, Cynthia	Falland, William	Farnham, Carol	Farnsworth, Karen
Farra, Jacbie S	Farreck, Dirk	Farrett, Don	Faste, Steven	Fenbert, Jeff	Feng, Angela
Fenne, Mitchell	Fennin, Calvin	Fenwick, Kevin	Figlar-Barnes, Ron	FitzHugh, Lynn	Forbes, Dave
Forbes, Dee	Foreman, Sheri	Fostes, Michael	Freefill, Aimee	Fujuro, Holism M	Gabrel, Catherine
Gage, Dan S.	Gallagher, Erin K.	Ganz, Nona	Garrison, Bill	Gates, Gus	Gentle, Rosemary
George, Kayah	Germanis, Robert J.	Giace, Clark	Glover, Cayne	Gochel, Diana	Goheen, Erik
Goldman, Peter	Goverman, Joan	Graham, Franklin	Graham, William L.	Grand, Christine	Granlenel, Jessica
Grant, Darin	Grant, Gabriel	Grant, Kathlen	Green, A	Greener, Barbara	Greenwon, Linda
Gregory, Mary Lou	Greonwalt, Darlene A	Greuer, Penny	Grunder, Ed	Gunn, Brian	Guthrie, Lola
Guyer, G.P.	Gylland, Kathleen	Haeliadanrian, Araz	Hall, Illegible	Hamilton, Peggy J.	Hancock, Simona
Hanson, Marc	Hardy, Jewel	Harmer, D A	Harrington, Bridgette	Hartling, Connor	Harvey, Chris
Hatley, Dave	Hausladen, Mary	Hayes, Jerald M.	Heff, Cynthia	Hegs, Helen	Heikel, Jim
Hemf, Cathleen	Henderson, Carol	Henderson, Charlene	Herestein, Nemesia	Hesterberg, Tim	Heyn, April
Heyn, Eric	Hickey, William	Hierholzer, Stephen	Hierholzer, Stephen	Hierholzer, Suzanne	Hierholzer, Suzanne
Higgins Jr, Benjamin	Hightower, Mike	Hines, Eleanor	Hofept, Charles	Hoff, Linda & Jim	Hohyl, Karen
Holm, Emily	Holmberg, Delisa	Hoshiro, Tatiana	Houghtalino, Leonard	Howard, Michael	Howe, Rose
Hufes, Patricia A.	Hulbert, Ken	Illegible	Illegible	Illegible	Illegible
Illegible	Illegible	Illegible	Illegible	Illegible	Illegible
Illegible	Illegible	Illegible	Illegible	Illegible	Illegible
Illegible	Illegible	Illegible	Illegible	Illegible	Illegible
Illegible	Illegible	Illegible	Illegible	Illegible	Illegible
Illegible	Illegible	Illegible	Illegible	Illegible	Illegible
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Illegible	Illegible	Illegible	Illegible	Illegible	Illegible
Illegible	Illegible	Illegible	Illegible	Illegible	Illegible
Illegible	Illegible	Illegible	Illegible	Illegible	Illegible
Illegible	Illegible	Illegible	Illegible	Illegible	Illegible
Illegible	Illegible	Illegible	Illegible	Illegible	Illegible
Illegible, Caprice	Illegible, James	Illegible, JH	Illegible, Pat	Illegible, Patricia J	Illegible, Stefan
Innelli, James	Irwin, Wesley	Jacobson, Rachael	Janroz, Carol & Cindy	Jansen, Linda	Jeffers-Schroder, Robert
Johnson, Jim	Johnson, Mitch	Johnson, Raymond E	Johnson, Tanya	Johnson, Teyah	Jones, Betty L
Jones, Chanda	Jones, Ryan	Joshi, Zarna	Joyawordhan, Shweta	Jupitar, Robert J.	Jurok, Jennifer
Kaczmarczyk, Diane M	Kaiyala, Julie	Kandas-Nelson, Mara	Kaplan, Rm	Karl, Sadie	Karrington, Travis
Kelley, Judy	Kenny, Casey	Kinared, Judy	Kinared, Kala	King, Joyce	King, Samantha
Kinne, Aden	Kirch, Gabe	Kirshenboury, Ross	Ko, Karen	Koracs, Marlene	Kramer, William K.
Kristwalk, Elfriede	Kveaner, Michael G	Lafferty, Liz	Lambert, Ed	Lammer, Alan D	LaMont Shillinger, G.
Larson, Carrie F.	Larson, Kimberly	Lauzon, Katy	Lavelle, Janice	Lawrence, Mary	Lazerwitz, Jay
Leaves, Tevide	Leckrone, Charlene	Legaspi, Vicki	Leonard, Ann	Leone, Gina	Letsinger, Brandon
Lewandowski, Roberta	Lewis, Kirstie	Liedlich, Steven	Lines, Ray	Linn, David	Linn, Lety
Linsey, Mark	Lloyd, Marc & Joyce	Loftness, Kim	Lomax, Jeff	Lundahl, Erika	Lyand, Steve
Mace, Theodora M.	MacFarlane, Ross	MacIntyre Witt, Jill	MacMathias, Wm Cameron L	Makowski, Kaarina	Malkin, Marsha
Maloney, Colin	Manning, Darwin C.	Mansour, Cindus A.	Marcus, Lisa	Marshall, Carly	Marten, Kai
Martinez, Gustavo	Martynowych, Denis	Martzu, Anne F.	Masen, Phil	Mass, Joanne H.	Mathers, Luke
Mathes, Rosa A	Mayer, Miles	Mayer, Miles	McCabe, Marianne	McComb, Illegible	McCowan, Erin
McCoy, Michael	McDivitt, Kathryn	McDonnell, Ken	McDougle, Ledora	McElroy, Sarah	McKimmel, Jennifer
McKimmie, Bella	McKinnary, Roy	McLachlan, Pat	McMiller, Annette L	McMurry, Nan	McNeal, Mercedes
McRaleik, Carol D.	Mea, Johnny	Meadows, Stephanie	Mears, Kelly	Merrill, Sam	Michelson, Dennis

Miller, Bev	Miller, Illegible	Miller, Ruth	Montes-Hamm, April	Moore, Danika	Morabito, Joan
Morabito, Tommi	More, Bob	Moss, Larry	Mottunger, Paul	Murphy, Kyle	Murray, Deni
Myhre, Mary	Nagel, Justine F.	Nakajima, Carl	Namatame, Carol	Nelson, Lin	Nelson, Lyn
Neptune, Don & Carol	Nett, Susan	Nevue, Alice	Nichol, Randy	Nicholson, Kailyn	Niesgoda, Tiennelle
Norman, Nancy	Norris, Robert	Nygaand, Valerie	O Brien, Patrick	Odinger, Kelly	Olson, Jean
Olson, Robert	O'Neal, Kate	Orseitti, David	Osborn, Robert B.	Palmer, John	Papp, Mary
Pappalando, Vince	Parker, Calvin	Parker, Cedar George	Parker, Janet	Parker, Shelley	Parkes, Daniel
Paulson, Jeff	Pavinich, Gary	Pavinich, Ted	Paxme, W. Illegible	Pecorav, Jan	Pennant, Sandie
Penry, Marlene	Philbrick, Tina	Phillips, Karen	Poppe, Daniel	Powers, Jeannine	Praevet, Emilee
Pratt, Bill	Prelan, Donna	Presley Estans, Jack	Quinn, Charlotte	Quintero, Gabe	Rachel, Rudy
Radford, Rob	Ramer, Kristina Tova	Ramos, Ana	Raney, Brett	Ray, Grace E	Ray, Srace C
Raykas, Barbara	Raymond, Charles	Raymond, Genevieve	Reason, Pamela	Reed, Doris	Reeves, Rose
Reinutser, Sharie	Reiter, Thomas C.	Remmers, Linda	Renaud, Bay	Renner, Richard	Repp, John M.
Reppond, Preston	Ricci, Allison	Rice, Nina C.	Richmond, Steve	Riemann Sr, James M	Riiker, Jennifer
Riser, Melinda	Rivendell, Laura	Roberts, Janice L	Robinson, Gina	Rodrigues, David	Rodriguez, Alberto
Rogers, Linda	Ross, Elizabeth F.	Rowland, David	Russo, Karen	Ryan, Freeman	Sachker, Audrey R
Samoya, Michael	Sathie, Glenda	Sauer, Kathy	Sauer, Philip	Sawada, Steven	Saxburn, Mari Kai
Scattery, Aaron	Schefetz, Sam	Schmidt, Vicki	Scholon, Francis	Schritzer, M.D.	Schroeder, Michael K.
Schrupp, Lawrence	Schute, B.	Schutto, Connie	Schwager, Janet	Scoss, Illegible	Seaman, Carol
Seaton, Bill	Seaton, Lizabeth	Setni, Amarpreet	Shack, Eddie L	Shapiro, Alice	Sheek, Serina
Shepherd, Kyle	Sherdahl, Judy	Shields, Anne	Shortman, Grant	Shriner, J. Erika	Siegrist, Grethen
Silhers, Coreen	Simbe, Rachel	Simone, Roberta	Simpson, Stacy	Sinclaire, Morgan	Skinner, Cathy
Skinner, Wayne	Slattery, Brianna	Slover, Glenda	Smeller, Kathy	Smith, Al	Smith, Clayton
Smith, Richard	Smith, Susanna	Sparks, Ryan	Spatz, Vern	Springer, Raymond	Stamon, Mike
Stark, Christa	Starke, David	Stauffer, Pete	Steelquist, Peter	Steen, Larissa	Stein, Danielle
Steinharter, Logan	Steinke, Bryan	Stire, Jennifer	Stitchal, David	Stitzhal, Laurel	Stock, Sidney
Stoller, Elliot	Stone, Lorna	Stott, John	Stroming, Ahren	Stunks, Troy	Styhes, Mr & Mrs Donald
Summers, Karen	Summers, Louis	Sunde, Carol	Sunde, Carol	Svett, Karen	Swalley, Ralph
Swally, Linda	Swearinglen, William	Sweezy, Marcia M.	Sweidel, Kara	Swirlie, Heidi	Tangeman, Anne
Taylor, Mason	Thomassian, Eric	Thompson, Sherrie	Thureson, Anne	Tiedev, Doris	Timmons, Maria J
Tipton, W. John	Trampush, Aaron	Trujillo, Shanyese	Tsaniff, Marissa	Turner, Ben	Tyson, Judy
Vane, Floie M	Vargas, Ben	Varland, Dan	Venchek, Kade Riker	Villeonga, Paula	Vogel, Robert
Vogler, Marilyn	W., Jack	Wade, Rebecca R.	Wagenbach, Michael	Wallace, Sharon	Walsh, Rebecca
Warber, Jill	Ward, Illegible	Warsinski, Charles	Watkins, Erin	Webb, Marty	Webb, Michael
Weber, Judy	Weisenbach, Terrika	Wells, Nancy	Wesley, Sheryl	Wetel, Paul	Whidden, Jennifer
White, Debora C	White, Doug	Williams, Bill	Willows, C. Erin	Wills, Leann	Wilson, Bea
Wilson, Kate	Wilson, Terri	Wirsing, Paul	Wnhoff, Tip	Wolf, Laurel	Wong, Kendrick
Wood, Bill	Wood, Katie	Young, Torey	Youngson, Eric	Zimmerman, Maureen	

FL16 Oil Shipping Terminal

Comment FL16-1

TO: Department of Ecology and City of Hoquiam

RE: Westway and Imperium Oil Shipping Terminal Draft EISs

Dear Ecology and City of Hoquiam:

The recent crude oil train derailments and oil spills across North America underscore the high level of danger that oil transport brings to Northwest communities and waterways. These accidents impact people's lives, homes, schools, jobs, and drinking water, as seen with the deaths of 47 people in Lac-Mégantic, Quebec. Our communities can't afford an oil spill or explosion.

The DEISs for the Westway and Imperium proposals:

1. Find that the risks of oil spills during rail transport, at the terminal site, and during marine vessel transport through Grays Harbor cannot be fully mitigated and if a spill occurred, the environmental damage would be significant.

2. Determine that the projects' increased rail and marine vessel traffic would increase the risk of a derailment, collision, spill, fire, or explosion.

3. Conclude that the projects would cause increased air pollution, increased noise, would have harmful impacts on tribal resources, and increase vehicle delay at railroad crossings long enough to disrupt emergency vehicle response times, and that these impacts cannot be fully mitigated.

Ecology and the City of Hoquiam should use the analysis and findings in the DEISs to reject these oil terminal proposals.

Furthermore, [space for additional comments]

The verdict is in – we cannot allow oil and coal companies to ship their dangerous and dirty fossil fuels through our backyards; Washington and Governor Inslee should say no to more oil and coal and lead on safe, renewable clean energy solutions. Sincerely,

Response to FL16-1

Refer to the Master Response for the Purpose and Focus of the EIS.

Table 7-26. Unique Comments Associated with Oil Shipping Terminal Form Letter

Commenter Name	Comment
Adney, Kaile	as someone who lives in a vibrant community with a major rail line running through it, on a port, I opose the proposed oil terminal projects as their potential for risk and harm to the surrounding community outweighs any benefit.
Response: Comment acknowledged.	
Anderson, Kathryn	As we've seen again and again with oil spills, natural ecosystems, wildlife suffer while companies profit. In addition, local communities bear the brunt of the costs - with their health and to economies that depend on natural resources (e.g. fishing, tourism).
Response: Comment acknowledged.	
Black, Tamara	Natural resources and human health are both at great risk if these projects are implemented. Our region need a cleaner, more sustainable economic future with much reduced reliance on fossil fuels.
Response: Comment acknowledged.	
Branshaw, Jon	as a commercial fisherman I oppose ANY oil by rail transport thru Grays Harbor. I experianced 1st hand the 1989 Exxon oil spill. Grays Harbor would be no different than the destruction tht befell PWS.
Response: Comment acknowledged.	
Branshaw, Laron	We went through the Exxon Valdez oil spill & its impact to Cordova Alaska "water & oil don't mix" as we all know--not to mention damage to environment and human impact- economic, emotional, financial- long term??
Response: Comment acknowledged.	
Bruton, Elsa M. (Peggy)	How can we even be considering these dangerous and destructive projects, knowing as we do that 80% of known fossil fuel reserves must be left in the ground if human civilization is to survive? It is insulting to the citizens of our state & region.
Response: Comment acknowledged.	

Carson, Chris	Superstorms & earthquakes are wildcards that must be added to the risks taken with the movement of such items by rail & ship. The impacts & risks to people, the natural environment, the climate & the world economy & focus is rapidly changing. We must move towards a more positive future with renewable sustainable energy sources & not continue to lock ourselves to a past that will only bare danger & destruction!
Response: Comment acknowledged.	
Cochrane, Julia B.	I am from Port Townsend, and am greatly concerned by the risk of increase tanker and barge traffic on all of the Salish Sea & the Olympic Marine Sanctuary.
Response: Comment acknowledged.	
Crawford, Tom	My wife and I frequently drive through Aberdeen and Hoquiam to visit Ocean Shores. We also attended the Shorebird Festival. Going forward with proposed project would be disasterous for our region. It would also be disasterous for our climate.
Response: Comment acknowledged.	
Downs, Mary	I am concern and fearful of and for the animals & people who will be dramatically impacted by a derailment. I feel we need to really weigh the advantages & disadvantages of further oil train development and make a stand and continue to inform the public-very interesting information should be a variety of speakers.
Response: Comment acknowledged.	
Edwards, David L.	The survival of humans on this planet is at stake.
Response: Comment acknowledged.	
Fandrich, Barbara J	We must protect our environment and it would be completely irresponsible to increase (or even continue) rail traffic with coal & oil shipments.
Response: Comment acknowledged.	
Fandrich, Delwin D	It is obvious neither the producers nor the railroads are concerned with the safety of these trains. They cannot be made safe. It is long past time for our elected officials and regulatory agencies to start putting the health and welfare of the people ahead of the profits of a few.
Response: Comment acknowledged.	
Gasaway, Diane	The risks to every aspect of our lives, communities, health, environment & economy are not for sale.
Response: Comment acknowledged.	
Groves, David E.	We need to keep our water clean especially for fishing and shellfish and shorebird habitat. I am a fisherman and need healthy salmon and trout habitat and for future generations. Damages in an accident last for decades.
Response: Comment acknowledged.	
Gubber, Katie	The risk of one of these shipments derailing anywhere, let alone on/near a wildlife refuge that is a vital part of our community ecosystem, and furthermore right next to publice K-12 school grounds is not worth the gain that these corporations would be attaining. I will not stand to live in a community that puts corporate gain over wild and human life.
Response: Comment acknowledged.	
Hargrove, Bourtai	The oil from the facilities, when burned, would add enough CO2 to the cumulative CO2 n the atmosphere, to make the international goal of keeping global warming below 2 degrees C impossible. That fact alone, should insure that the proposals be denied. No mitigation is possible!
Response: Comment acknowledged.	
Hatley, Dave	I live in the blast zone in Central Park & fear for my life & my neighbors. I live on the Chehalis River & fish & bird watch--Blue Heron-Osprey-Bald Eagle (illegible) waterfowl & fish at risk if bomb trains come to Port of G.H. Stop the trains--they R dangerous to the air-water-wildlife & people of Grays Harbor. This is an insane idea.
Response: Comment acknowledged.	
Holm, Patricia A.	We shoud not burn any more fossil fuels because our planet will not be inhabitable for humans if we continue burning all the oil and coal we have in reserves. We must spend our treasure on renewables (sun and wind energy) to save our civilization. This cannot be mitigated.
Response: Comment acknowledged.	

Hunter, Rhonda	We need clean energy jobs in our state, not oil & coal pollution threatening us for fossil fuel company profits. We are a green state, not the export route state for worsening climate change, by exporting more fossil fuels.
Response: Comment acknowledged.	
Janowitz, Karen	As a Washington State citizen, I implore you to protect all citizens, and prevent coal & oil transport through our communities. The facts are obvious and well-founded. Thank you.
Response: Comment acknowledged.	
Johnson, Calvin	The increase rail traffic is a serious concern due to noise, air pollution and traffic congestion.
Response: Comment acknowledged.	
Johnson, Ella	The impact of a oil train derailment would directly effect the fishing community that my family needs as fisherman in the area of the Chehails river
Response: Comment acknowledged.	
Johnson, Heather	As an owner of a commercial fishing business I am very concerned about the proposed shipping terminals. Not only do they pose a serious risk to commercial fishing grunds, the vessel traffic is dangerous to the fishermen on the water. The potential cost to the livelihood of many verses he small increase in jobs is not worth the risk.
Response: Comment acknowledged.	
Levy, Cindy	It only takes one spill/derailment to create a major catastrophe. We can't afford that. Would you want a rail line transporting this next to your home? Furthermore, we must focus on developing clean, renewal energy sources. We cannot wait any longer to end our dependence on fossil fuels, with all the risk that entails.
Response: Comment acknowledged.	
Loughlin, Donald T.	I am installing 15.4 Kw (60) solar panels on my home-collecting water-making 60+ cu yds of soiil for growing food-inner city-double size log. Where is the development of solar on labor class homes?
Response: Comment acknowledged.	
McCabe-Gould, Shannon	The increased demand in America for oil is a symptom of oil company's stubborness to not accept that oil should be a thing of the past. They pay their way around the law in the form of fines & need to be penalized correctly & put out of business.
Response: Comment acknowledged.	
Newmann, MD, William E.	This preventive action opportunity is good for all of us! Let's take advantage of it, make it a model for the rest of the country.
Response: Comment acknowledged.	
Nogler, Tom	The climate crisis demands the advance beyond fossil fuels, development of alternate energy resources and the abolishment of corporate organization and the advance to a PLANNED ECONOMY.
Response: Comment acknowledged.	
Paynter, Mary L.	Oil spills such as Exxon Valdez and BP not only destroy health of the people living in the region--they also destroy jobs. The small number of jobs involved in construction and operation of terminals pales in comparison to traditional & sustainable livelihoods in fisheries, tourism, etc.
Response: Comment acknowledged.	
Peeler, David	We should not be approving new export facilities or additional oil trains due to safety and environmental concerns, including climate change, global warming and ocean acidification. Let's stop increasing fossil fuel use now!
Response: Comment acknowledged.	
Peeler, Maria Victoria	The potential impact to the nearby military facilities if a fiew gets out of control needs to be assessed as well. Thurston County and Pierce County often have fire alerts in dry season. Needless to say, this is important.
Response: Comment acknowledged.	
Pelly, Michael	Fossil fuels are on the way out. Don't let these bullies push their dirty outdated technology onto beautiful Grays Harbor County. Grays Harbor County has a lot going on and it does not need to become a toxic waste land.
Response: Comment acknowledged.	

Price, Nick	I know its not proffessional, but I swear if I see one of those trains in Washington, I will lie down on the tracks and dare them to run me over. NO MORE COAL AND OIL IN MY STATE
Response: Comment acknowledged.	
Rhodes, Dustry	The fossil fuel industry already has five times the amount fuel reserves in the ground that can be safely burned without exceeding the CO2 levels that will send climate spiraling out of control and condemning future generations to a living hell. We should be scaling down fossil fuel use NOT ramping it up.
Response: Comment acknowledged.	
Ruth, Maria	Allowing the Westway & Imperium projects is shortsighted, ill-concerned, and irresponsible. Our state should never allow oil, gas, & coal projects whos negative environmental impacts cannot be mitigated.
Response: Comment acknowledged.	
Sandwell, Susan	The health and well being of the citizens, and children, of Grays Harbor is at critical risk with this development and the oil/coal projects should be permanently denied. No crude by rail
Response: Comment acknowledged.	
Scavezze, Barbara J	Our region needs the transition to clean energy and leave fossil fuels in the ground, to avoid the worst effects of climate change.
Response: Comment acknowledged.	
Schaeffer, Kathleen	Locating the terminals in Grays Harbor will impact the safety and health of the residents of the communities along the railway and terminals.
Response: Comment acknowledged.	
Schleger, Laura	Our only chance to keep global temperatures from reaching a tipping point is to keep all fossil fuels in the ground-and their combustion products out of the air & water. I feel outraged that there even is any quesiton here. Dept of Ecology is paid by the taxpayers to protect our environment-no hearing are necessary for these projects. By definition they will create great environmental destruction in our state. Ecology's job is to NOT allow these projects to go forward! No DEIS hearings necessary to determine this!
Response: Comment acknowledged.	
Schneid, Pacé	Our community/nation needs to support only clean energy and fuel sources to ensure a sustainable future for our children and really, all life on earth.
Response: Comment acknowledged.	
Seaman, Carol J.	Thousands of people are in the affected in all communities with unprecendented volumes of crude volatile oil. This plan would be a disaster for the fishing and shellfish economy. With a 450% increase in vessel traffic - a displacement of numerous fish species would be eliminated.
Response: Comment acknowledged.	
Shea, Carolyn	The risks for the region's environment, wildlife, and marine life is unacceptably high, along with the risks for the region's economy and people's health and welfare.
Response: Comment acknowledged.	
Shineke, Noah Ransom	Please Help humanity and make the probability of us blowing up less.
Response: Comment acknowledged.	
Short, Jasmine H	Oil and coal companies hurt every aspect of our environment.
Response: Comment acknowledged.	
Simcich, Tina	The value of our health, environment and economy that is threatened by these projects far surpassed the value from these projects. Let's move towards a cleaner more propserous future!
Response: Comment acknowledged.	
Spalding, Shelley	We need to be building a sustainable energy infrastructure. Expanding the fossil fuel infrastructure in Aberdeen & Hoquiam poses substantial risks to people, wildlife & fish.
Response: Comment acknowledged.	

Steelquist, Peter	This plan de-prioritises the needs of our coastal communities and and jepardises the future of our economies our environment and our touism industry. Pleas respect the wishes of our moderate, reasonable citizens
Response: Comment acknowledged.	
Streiffert, Dan	Oil spills in Gray's Harbor would have devestating effects on wildlife, including migrating birds. Climate change is the most significant problem we have today, and we must get off of fossil fuels as quickly as possible.
Response: Comment acknowledged.	
Sullivan, Nancy	If we ruin our air, what will we breathe? We are shipping this oil to Asia and it is all going to blow back at us.
Response: Comment acknowledged.	
Tanowitz, Wendy	Oil storage tanks can explode, and can be destroyed by an earthquake/tsunami. It is a no-brainer to reject the proposed facilities for Hoquaim/Grays Harbor county. Our state is NOT a national sacrifice area-we all need air, water, soil for life. Do not sell our commons!
Response: Comment acknowledged.	
Tourtillott, Kayta	Putting the health of countless men, women, and children in Washington state is unthinkable. The added environmental impacts makes it completely unacceptables.
Response: Comment acknowledged.	
Visser, Harmen, P.	I am deeply concerned regarding the environmental impacts that may occur to natural areas in and around western Washington. The grace and beauty of Washington is the primary preason my family and I moved here, and we now feel this is threatened.
Response: Comment acknowledged.	
Yoos, Scott A.	...It is past-due time fror WA state (& the rest of the planet!) to move beyond our addiction to heavy Fossil Fuel reliance. It is NOT a sustainable solution to our energy needs, nor is it a safe one, transportation-wise.
Response: Comment acknowledged.	
Zita, Dr. E.J.	As a PhD scientist, I know that the risks of this project far outweigh the benefits. Thank you for protecting WA state's public health, safety, and natural resources by denying all permits for this project.
Response: Comment acknowledged.	

Table 7-27. Names Associated with Oil Shipping Terminal Form Letter

Adney, Kaile	Anderson, Kathryn	Black, Tamara	Branshaw, Jon	Branshaw, Laron	Bruton, Elsa M. (Peggy)
Carlson, Joel F	Carson, Chris	Cochrane, Julia B.	Crawford, Tom	Downs, Mary	Edwards, David L.
Fandrich, Barbara J	Fandrich, Delwin D	Gasaway, Diane	Groves, David E.	Gubber, Katie	Hargrove, Bourtai
Hatley, Dave	Holm, Patricia A.	Hunter, Rhonda	Janowitz, Karen	Johnson, Calvin	Johnson, Ella
Johnson, Heather	Johnson, Larry	Johnson, Rebecca	Levy, Cindy	Loughlin, Donald T.	McCabe-Gould, Shannon
Newmann, MD, William E.	Nogler, Tom	Paynter, Mary L.	Peeler, David	Peeler, Maria Victoria	Pelly, Michael
Price, Nick	Rhodes, Dustry	Rolf, Margo	Ruth, Maria	Sandwell, Susan	Scavezze, Barbara J
Schaeffer, Kathleen	Schleger, Laura	Schneid, Pacé	Seaman, Carol J.	Shea, Carolyn	Shineke, Noah Ransom
Short, Jasmine H	Simcich, Tina	Spalding, Shelley	Steelquist, Peter	Stockbridge, Hal	Streiffert, Dan
Sullivan, Nancy	Tanowitz, Wendy	Tourtillott, Kayta	Tvedt, Karen	Visser, Harmen, P.	Yoos, Scott A.
Zita, Dr. E.J.					

FL17 Oregon Interfaith Power and Light

Comment FL17-1

September 23, 2015

Dear Washington Department of Ecology and City of Hoquiam:

We are people of faith and good will gathered together in Portland Oregon on the eve of Pope Francis visit to Congress to pray for an interfaith Vigil for Creation. We are encouraged by Prop Francis's moral call to protect the climate and all of Creation.

Religious leaders and people of faith around the Northwest are opposed to oil-by-rail projects and fossil fuel terminals that are built on unstable land in populated areas, and that contribute to climate disruption. The Westway and Imperium oil terminal proposals for Gray's Harbor, Washington are not good stewardship of our communities, land, water, and climate. We know we can do better.

The recent crude oil train derailments and oil spills across North America underscore the high level of danger that oil transport brings to Northwest communities and waterways. These accidents impact people's lives, homes, schools, jobs, and drinking water, as seen with the deaths of 47 people in the tragic Lac-Mégantic, Quebec accident. Trains delivering oil to the Westway and Imperium proposed terminals would travel, in part, along the Columbia River-a great concern to both Oregon and Washington residents. Our communities on the train route can't afford an oil spill or explosion. The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if.

We the support protection of Grays Harbor and its people, and urge you to use the analysis and findings in the DEISs to reject these oil shipping terminals. Sincerely,

Response to FL17-1

Refer to the Master Response for the Purpose and Focus of the EIS.

Table 7-28. Names Associated with Oregon Interfaith Power and Light Form Letter

Allee, Pamela	Alvarado, Stephany	Badger-Cain, Roberta	Bates, Eloise	Bautista, Claudia	Boucher-Colbert, Priya
Bratcher, Andre	Chapman, Valerie	Christopherson, Rose	Cutty, Judy	Dean, Judith A.	Diaz, Roman
Garcia, Naomi	Gomez, Angela	Gomez, Maria	Haswarey, Asif	Hasweirley, Shanfene	Hernandez, Iris
Hernandez, Yvette	Heverly, Craig	Hites-Clabaugh, Lucinda	Holmes, Jenny	Hupp-Shine, Julia	Jasch, Rev. Katherine
Jones, Jane	Karwaki, Tom	Kenyon, Howard N.	Kersey-Brouec, Isaac	Lopez, Yoselin	MacGregor, Margaret
MacGregor, Margaret	Mathew, Karen	McCormick, Donna	Meinke, Brennan	Merrick, Don	Merrick, Donald L.
Moline, Heather	Moline, Heather	Nguyen, Randy	O'Hanley, Kelly	Okulam, Rev. Dr. Frodo	Phillips, Letty
Pitney, Rev. John	Prism, Mary	Rainwater, Rev Genko	Ramos, Eva	Reding Hoffart, Tess	Richards, Jenna
Roberts, Harriet Edity	Rodrigues, Robin	rodriguez, John M	Shaw, Stuart R.	Stookey, Jeff	Stretch, Francis
Suter, Alice	Truby, Aaron	Trulig, Thomas L.	Wagner, Tyler	Warren, Alison	Wohlstein, Harry
Yorba, Jacqueline	Zigrang, Tricia	Zuckerman, Jan			

FL18 Sierra Club-1

Comment FL18-1

Gordon White, Washington Department of Ecology

Brian Shay, City of Hoquiam

Re: Public comment on Westway and Imperium Expansion Projects DEIS

Dear Department of Ecology and City of Hoquiam,

I'm writing because I oppose the proposed Westway and Imperium bulk liquid storage terminal expansion projects located at the Port of Grays Harbor.

I believe that the risk posed by increased oil traffic, particularly by dangerous oil trains running through our communities, is unacceptable, and the Draft EIS doesn't go far enough to consider those and other risks. In particular:

The Draft EIS does not adequately address the impacts to the rail communities and waterbodies in the extended area. The DEIS inexplicably only studied the last 59 miles ------ less than 5% ------ of the route. The last few years have seen an enormous expansion in the amount of highly volatile crude oil shipped by rail, and there has been a corresponding spike in the number of derailments, fires and explosions. State and federal regulation of crude---by---rail transport doesn't go nearly far enough, so more oil train traffic through our communities increases the risk of loss of life, property damage, and pollution from oil spills. Turning Washington State into an oil export hub, through these proposals and others, will make it much more likely that the next oil disaster will happen here. This isn't just an issue for Grays Harbor, it's an issue for the entire state. These dangerous trains would travel right through heavily populated areas like Vancouver and Spokane.

The Draft EIS also failed to adequately consider a number of other important issues, including, but not limited to: the uniquely high combustibility of Bakken crude oil; the potential of even low---speed train car derailments, punctures, spills, fires and explosions; risks to endangered or listed species; risks to sole---source aquifers in Vancouver and Spokane; statewide traffic impacts; full statewide economic impacts of an oil train disaster; inadequate preparedness of first responders; quality of oil spill cleanup; adequacy of insurance; rail inspection failures; risks of fire spreading beyond one train car or oil storage tank in the event of a leak, fire, or explosion; risks posed by outdated and insufficient oil barge regulations; and how this proposal would increase Washington State's contribution to carbon pollution and climate change.

Please also do a full accounting of the flaring and fugitive emissions of greenhouse gases in the oil fields, in the gathering areas, in the loading areas, and from the tank cars during transit and unloading.

I urge you to ensure that the Final EIS makes a more comprehensive and rigorous analysis of all aspects of safety, environmental and economic risks posed by these proposed oil terminal expansions and the increased rail and barge traffic that they would enable. These proposals are guaranteed to produce significant and unavoidable adverse impacts to our communities, our state, or our environment. Because of this, the permits should be denied outright.

Thank you for your consideration.

Response to FL18-1

Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Chapter 5 acknowledges that the routine transport of crude oil in the extended study area related to the proposed action could increase impacts similar in nature to those described in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

Final EIS Chapter 5 reflects additional information characterizing potential risks related to rail transport in the extended study area under existing conditions, the no-action alternative, and the proposed action. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions. Although the proposed action could result in an increase in the likelihood of an incident involving the release of crude oil, individually and cumulatively, the potential consequences would be similar in nature and magnitude to those that could occur under existing conditions and the no-action alternative. Depending on the specific circumstances of the incident, there is the potential for significant impacts. The potential impacts described in Section 4.7, *Impacts on Resources,* would apply to the extended study area.

The approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill.

Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. Section 4.7 also acknowledges resources that could be adversely affected in the event of an oil spill, fire, or explosion in the study area. Nonetheless, mitigation would not completely eliminate the possibility of an incident. Depending on the specific circumstances, the environmental impacts could be significant.

For additional information about the analysis of risks associated with potential oil spills, fires, and explosions, refer to the Master Response for Environmental Health and Safety Analysis and the Master Response for Risk Assessment Methods.

Table 7-29. Unique Comments Associated with Sierra Club-1 Form Letter

Commenter Name	Comment
Bar-El, Pamela	I am a resident of Hoquiam in Grays Harbor County and I'm saying NO to big oil! I don't want mile long oil trains moving through this area. I don't want to breathe the pollutants emitted by crude oil refineries. I don't want to see the devastation to our wild life and scenic rivers and shoreline caused by oil spills. I don't want to see more families destroyed when the fishing industry succumbs to oil spills. I don't want to pay to clean up the mess and destruction of a derailment of a crude oil train. Big oil won't care and neither will China; do you? PLEASE SAY NO TO THE OIL TRAINS AND REFINERIES IN GRAY'S HARBOR.
Response: Comment acknowledged.	
Campbell, Linda	EIS doesn't go far enough to consider these and other risks.
Response: Comment acknowledged.	

Commenter Name	Comment
Caplow, Florence	I am a homeowner in Pacific County, a trained conservation biologist, a Unitarian Universalist minister and a concerned citizen. I believe that the risk posed by increased oil traffic, particularly by explosive oil trains running through our communities, is unacceptable, and the Draft EIS doesn't go far enough to consider those and other risks.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Chakraborty, Srijan	I stand with thousands of residents calling for investment in better environment, not more fossil fuel-centric development. Sierra Club and other environmental groups have pointed out many specific issues and I agree with them.
Response: Comment acknowledged.	
Chasse, Joe	Please, stop the bomb trains.
Response: Comment acknowledged.	
Cotrell, Katharine	We must prevent these disastrous terminals. Anybody with any sense and even a modicum of education on the issues of climate change and environmental degradation can plainly see that these terminals are not in the best interest of the residents of Grays Harbor, nor those of us who live along the railroad lines that would feed these monstrosities.
Response: Comment acknowledged.	
Durbin, Steve	STOP BIG OIL, NOW...!!!
Response: Comment acknowledged.	
Fox-Middleton, Steven	Let's leave our home, to the next generation, cleaner than we inherited it.
Response: Comment acknowledged.	
Genest, Karen	Grays harbor does not need to have yet more oil storage. I am against the proposed Westway and Imperium bulk liquid storage terminal expansion projects. There are so many risks involved in pilot transport, risks to our communities, our water sources. From what I understand, not all so them are thoroughly considered and impacts determined. The last few years have seen an enormous expansion in the amount of highly volatile crude oil shipped by rail, and there has been a corresponding spike in the number of derailments, fires and explosions. Expanding the facility and increasing train transport won't help. There are also the highly volatile crude oil itself, risks to endangered species...as well as the health of humans, pollution, climate impact plus who would pay for the clean up?
Response: Refer to the Master Response for Liability and Responsibility for Incidents.	
Hanlon, Linda	Too risky. Deny the permits outright.
Response: Comment acknowledged.	
Harney, Denis	I am concerned about the projected increase in the number of oil trains traveling through Washington State. The probable result of this increased rail traffic would be an uptick in derailments, fires, and explosions, putting the surrounding communities at risk. I hope you take these "externalities" into account in the Final EIS for these proposed projects.
Response: Refer to Master Response for Purpose and Focus of the EIS.	
Hendrickson, Terrill	A potential spill would jeopardize major fisheries and the lives of native peoples.
Response: See Response to FL1-1. Refer to Draft EIS Section 3.12, *Tribal Resources*, for potential impacts from the proposed action and Section 4.7.1.7, *Tribal Resources,* for potential impacts from an incident.	
Hiebert, Ricky	We have long passed the time in human history where this type of venture makes any kind of sense.
Response: Comment acknowledged.	
Hildreth, Patrick	WHEN DO WE SAY ENOUGH IS ENOUGH? AFTER A SPILL??
Response: Comment acknowledged.	
Jacky, S	Also, please do a full accounting of the flaring and fugitive emissions of greenhouse gases in the oil fields, in the gathering areas, in the loading areas, and from the tank cars during transit and unloading.

Commenter Name	Comment
Response: Refer to the Master Response for Crude Oil Extraction, Transport, and Combustion.	
Jacobs, Nancy	I think it is simply too risky.
Response: Comment acknowledged.	
Keefe, George	My wife and I life within the "BLAST ZONE."
Response: Comment acknowledged.	
Lawrence, George	There are multitudinous environmental dilemmas with proposed Westway and Imperium bulk liquid storage terminal expansion projects in Grays Harbor. These proposals would result in up to additional dangerous mile-long oil trains traveling from North Dakota and Montana with inarguable attendant risks of derailments, tank ruptures, oil spills, fires, explosions and other immediately obvious and emergent impacts. There would also be more subtle and chronic epidemiologic risks from noise, emissions, and obstruction of personal, commercial and emergency vehicles. I would like to focus on specific risks incumbent with the inadequate design of the crude oil tankers to be utilized. The workhorse of the fleet is the DOT-111, which has been primarily responsible for the derailment-associated containment failure and resultant fire and explosion seen in at least six episodes in North America in 2014 and 2015. The upgraded design known as the CPC-1232 has better protection of valves on the top and bottom of the tank car, but still suffers from the fact that the shell is still 7/16 steel instead of the 9/16 recommended by the National Transportation and Safety Board or NTSB. These newer CPC-1232 models have also been responsible for some of the explosive failures in recent months. The other basic defect of these cars is inadequately sized pressure relief devices for PRDs. These open at 35 psi above atmospheric pressure, but a car which is exposed to the heat of an adjacent fire is unable to vent rapidly enough to prevent an explosive conflagration. Contrariwise, in normal operation under elevated atmospheric temperature + direct sun some volatile components are regularly released, in contradistinction to safer pipeline transport. As explored in Charles B. Perrow's book Normal Accidents, the interactive complexity of high-risk technologies such oil-by-rail in the United States will result in a predictable rate of serious accidents, serious enough that careful evaluation must be made to determine what risks to rail and refinery workers, emergency response personnel, the general public, urban concentrations, waterways, shellfish and fishing areas are to be considered in the EIS process. Clearly requirements for better trackbed maintenance, slower train speed limits, and much better containment design of tank cars must be absolute requirements. I appreciate your detailed attention to these matters.
Response: Comment acknowledged.	
Lefevre, Neatha	Especially our beautiful Columbia River Gorge and to our fisheries. These dangerous trains would travel right through heavily populated areas like Vancouver and Spokane.
Response: Comment acknowledged.	
Lenzen, Patricia A	Let Washingtonn keep itself clean. Keep out oil terminals now PROPOSED.
Response: Comment acknowledged.	
Looney, William	OUR STATE, OUR EARTH, OUR CHOICE! William Looney
Response: Comment acknowledged.	
Mccoy, Louellen	HE WHO TRAMPLES ON THE EARTH, TRAMPLES ON HIMSELF!
Response: Comment acknowledged.	
Mccoy, Louellen & Miles	HE WHO TRAMPLES ON THE EARTH. TRAMPLES ON HIMSELF!
Response: Comment acknowledged.	
Meehan, Sonny	Dangerous oil trains running through our communities are unacceptable and the Draft EIS doesn't go far enough. I urge you to ensure that the Final EIS makes a more comprehensive and rigorous analysis of all aspects of safety, environmental and economic risks.
Response: Refer to the Master Responses for Environmental Health and Safety Approach and Emergency Response and Planning Gaps Evaluation.	

Commenter Name	Comment
Meshke, Beth	Please do not allow this project. Thank you.
Response: Comment acknowledged.	
Montgomery, Betty	I live just a couple miles from the tracks in Vancouver.
Response: Comment acknowledged.	
Nichols, Terry	The unilateral action by the Port of Vancouver to accept the oil terminal has endangered the entire community. We were not consulted in advance of the decision being made by a few people with motives different from ours. We all know the explosion potential of the oil trains since it has happened fairly regularly throughout the country and our own fire department has admitted they are totally unprepared to accommodate something like that if it happened here. So why do it? I live 1/4 mile away from the tracks that will carry the oil and I do not appreciate having to worry about a fireball taking out my house, my family and my neighbors just so some people I'll never meet will get rich. These contractors are foreign firms. Do you think they give a damn about us or the environmental damage they could do? I think not. Please help contain this lust for profit. We moved here because it's a nice community located in a beautiful site. Let's keep it that way.
Response: Comment acknowledged.	
Orme, Kevin	Not Another Galveston!
Response: Comment acknowledged.	
Overbey, Joel	Oh, one more thing. HELL NO I DON'T WANT TO BLOW! GET THIS RAIL BOMB OUT OF MY BACKYARD!
Response: Comment acknowledged.	
Owen, James	If they're going to build an oil shipment terminal at Grays Harbor, WA, I do hope you check it out carefully. It's important to me that proper preparation is made BEFORE environmental damage is made to limit its effects. It's only responsible.
Response: Refer to the Master Response for the Purpose and Focus of the EIS.	
Parker, Michael	It is certain there will be disasters of varying proportions if these projects are constructed. Common sense demands that these projects be abandoned.
Response: Comment acknowledged.	
Reynolds, Adele	Keep our communities & waterways clean.
Response: Comment acknowledged.	
Roberts, H	Oil hub? We need to protect Washington's coastline and communities from a dirty oil disaster! It is all risk and no reward for Washington. Look to the future -- a future of clean energy. Dirty oil is the past -- let's not make the pristine coastlines and oceanside communities of Washington a thing of the past, too. Thank you.
Response: Comment acknowledged.	
Sanford, Robert	Protect our communities from the ravages of corporate greed and planet raping.
Response: Comment acknowledged.	
Schwartz, Derek	I do not believe it is in the interest of our country to export oil pumped from our grounds in North America. If the refining capabilities of North America are insufficient to accommodate the amount oil being recovered from our lands, it makes more sense to secure our long term energy independence by recovering less oil and not contributing to other countries pollution through unnecessary transport and combustion. This reasoning, combined with the probable development of the PSR rail delivery system that will increase the volume of crude oil being transported through my community in Pasco, WA and my state motivates me to oppose the proposed Westway and Imperium bulk liquid terminal expansion projects. Thank you!
Response: Comment acknowledged.	
Sherman-Peterson, Deejah	My religious faith teaches respect for the interdependent web of all existence of which we are a part. Fossil fuel extraction, transport and burning contradict the needs of life on Earth. The risk posed by increased oil traffic, particularly by dangerous oil trains running through our communities, is unacceptable.

Commenter Name	Comment
Response: Comment acknowledged.	
Steeley, Howard	Don't allow the bomb trains of hazardous oil.
Response: Comment acknowledged.	
Steinke, Don	You need to include managerial negligence in your Draft EIS. When BNSF messes with workers schedules, the mental fatigue prevents workers from being alert. This guy resigned in protest: http://www.whitefishpilot.com/news/bnsf-engineer- walks-away-from-career-over-safety-concerns/article_fdf533c0-8e16-11e5-adfe- 83bc64009f58.html
Response: Comment acknowledged.	
Thompson, Robert	Time to move on to solar and wind power.
Response: Comment acknowledged.	
Umphred, Neal	JUST DO THE RIGHT THING!
Response: Comment acknowledged.	
Vandenberg, Nancy	The risk of a derailment endangers our water supply, and also increases the risk of a fire that could be devastating. Also, just as important, this will contribute to global warming, which has its own threats, and needs to be addressed by the EIS, though I believe that the permits should be denied on the basis of safety alone. I see no benefit to these projects--yes, there would be some job creation, but surely that would be offset by the danger to water and air quality, and the possibility of a devastating accident due to derailment. Why not create jobs instead by clean renewable projects?
Response: Comment acknowledged.	
Vaughn, Edward	There's more than enough oil sloshing around already without having more railed in.
Response: Comment acknowledged.	
Voss, Barbara	Do not do this. I believe that the risk posed by increased oil traffic, particularly by explosive oil trains running through our communities, is unacceptable, and the Draft EIS doesn't go far enough to consider those and other risks.
Response: Refer to the Master Responses for Environmental Health and Safety Approach and Emergency Response and Planning Gaps Evaluation.	
Wade, Bruce	The rail companies are well prepared for simple failures of track and simple spills of non-hazardous stuff like grain. The rail companies and communities they run through are not prepared for oil spills or fires, nor are they likely to have enough insurance coverage to remedy the problems such spills cause. Running more trains through Washington will add immense risks and costs to communities that the rail companies are unable to prevent or pay for, leaving US holding the bill on all counts. Oil trains are not in our interest and pose a serious risk to our way of life well beyond any economic benefit we may get from them.
Response: Comment acknowledged.	
Wahl, Mark	PLEASE NO OIL BOMBS THROUGH OUR POPULATION
Response: Comment acknowledged.	
Walker, Annie	There is NO WAY that increased oil train traffic and Bakken oil handling can be a wise investment for Grays Harbor or for this state. If Washingtonians want to invest in the energy industry, we are blessed with numerous non-dangerous, renewable resources which we can lead the nation in developing and producing. It is NOT a question of IF there will be disasters or spills -- but when and how bad. This has been proven in Canada and elsewhere in the US. There is no sane and sound reason to be bringing this material daily near Washington cities, along the Columbia Gorge and into Grays Harbor -- one of the finest estuarian areas on the entire west coast. I urge you to deny permitting or progress on these plans right away and here forward. I promise to vote AGAINST any legislator I'm able who supports these plans in whole or in part. This process needs to be halted outright.
Response: Comment acknowledged.	

Commenter Name	Comment
Walseth, Jim	I was born in Aberdeen WA and live to this day in the State of Washington. As my parents become NorthWesterners and raised their children including me, they came to embrace preservation of the natural world as a fundamental value. I honor them when I say that storage terminal projects located at the Port of Grays Harbor. From glaciers to shellfish to salmon the beautiful land we live in is threatened by the products shipped to and from these sites. Please do not approve. Best regards, Jim Walseth
Response: Comment acknowledged.	
Winnie, Stuart	There's too much chance of disaster and too little gurantee for our safety. I believe that the risk posed by increased oil traffic, particularly by explosive oil trains running through our communities, is unacceptable, and the Draft EIS doesn't go far enough to consider those and other risks.
Response: Refer to the Master Response for the Purpose and Focus of the EIS.	

Table 7-30. Names Associated with Sierra Club-1 Form Letter

Abel, Teresa	Abrams, Doreen	Acheson, Nichole	Acker, Michael	Ackerman, Laura	Adams, Deborah
Adams, Jennifer	Adams, Judith	Adams, Marsha	Adams, Marsha	Adams, Winnie	Adamson, Kristen
Adamson, Kristen	Aegerter, Bob	Agard, Lisa	Agee, Di	Aiello, Frank	Airoldi, Sara
Akeia, Randa	Akers, Michael	Akins, Judith	Albee, Matthew	Albert, Kathy Taylor	Albertson, John
Albrecht, Peter	Albright, Gary	Alcorn, Christopher	Aldecoa, Anastasia	Aldecoa, Anastasia	Alderton, Janet
Alexander, J.	Alexander, Judith	Alexander, Mike	Alexandra, K	Alexandria, Urquhart	Alford, Susan
Allan, Christopher	Allen, Cathy	Allen, James	Allen, James	Allen, Justin	Allen, Mackall
Allen, Marlene	Allen, Teresa	Allen, Veronica	Altenburg, Kim	Alva, Margaret	Alvey, R.
Amako, Marie	Amend, Tom	Amoroso, Amy	Anderson, Angela	Anderson, Becky	Anderson, Bruce
Anderson, Daniel	Anderson, David	Anderson, Erika	Anderson, Jude	Anderson, Luanne	Anderson, Matthew
Anderson, Molly	Anderson, Ray	Anderson, Ruth	Anderson, Scott	Anderson, Valerie	Anderson, Valerie
Anderson--Ketchmark, Corrine	Andeway, Kathy	Andolina, Lansing	Andrade, Christian and Lea	Andrews, Ellie	Andrews, Sharon
Androvich, Jack	Angelico, Mary	Aniballi, Brett	Anthes, Russell and Deb	Anthes, Russell Steve	Anton, Gloria
Antonio, Monica	Arakawa, Clarice	Arbess, Saul	Archambault, Chris	Archambault, Chris	Armann, Mary Bea
Armond, Christine	Arnold, Buzz	Arnold, Susan	Arntson, David	Arntson, Mark	Arrington, Ardith
Arthur, June Mac	Ashley, Margaret	Asmus, Sigrid	Aspland, Maggie	Astete, Sabina	Atkins, Ted
Atkinson, John	Atkinson, Martha	Attwood, Michele	Attwood, Michele	Auerbach, Peter	Auld, Jean
Ausems, Moira	Austerman, Darla	Austin, Bonny Jean	Avery, Jean	Avery, Jean M.	Avery, Jean M.
Avery, Judy	Avinger, Linda	Ayers, Randall	Ayers, Randall	B, Shary	B., Matt
Baca, K	Baggett, Allison	Bahnick, Michelle	Bahnsen, Patrice	Bailen, Susana	Bailey, Dori
Bailey, Dori	Bailey, Roger	Bailey, Stephen	Bailor, Ann	Bain, William And Gail	Bajwa, Ravinder
Baker, Norman	Baker, Rachel	Bakken, Joan	Baldwin, Rebekah	Balles, Katherin	Ballew, Louann
Ballhorn, Seth A	Ballo, Mark	Balogh, Virginia	Baltaxe, Peter	Bandura, Mary	Banghart, Robert
Bankson, Timothy	Bannerman, Lynne	Barber, Kristin	Barcott, Nick	Bar--El, Pamela	Barker, Keri
Barkovich, Shara	Barnes, Bob	Barnes, Sharon	Barnum, Bruce	Barnum, Robert	Baron, Glen
Barr, Jesse	Barrett, Rick	Barson, Kalanit	Bartelmes, Paul & Farley	Bartholomew, Gabriele	Bartleson, Elisabeth
Bartlett, Faye	Bartlett, Wendy	Barton, Marsha	Bassett, Bev	Bastow, Megan	Bauer, Peter
Baughn, Delinda	Bauman, Neil	Bauman, Neil	Bauman, Sarah	Bayer, John	Beach, Joyce
Beaven, Jane	Beavin, Kathleen	Bebbington, Philip	Becherer, Ann	Becht, Bill	Bechtholt, Susan
Beck, Jean	Beck, Patrice	Becker, Robert	Beckham, Ron	Bedirian, George	Belazi, Ahmed
Bell, Dottie	Bell, Stephanie	Belshaw, Mary	Beltra, Daniel	Bencivengo, Anthony	Bendix, Pamela
Bendixen--Park, Kitty	Benedict, Marc	Benham, Mary	Bennett, Gary	Benning, Barbara	Benoit, Elna
Benson, Michael	Benson, Paul	Bentham, Felicia	Bentzel, Jen	Bentzel, Jennifer	Bereczki, Patricia
Berentson, Anna	Berger, David	Bergman, Werner	Berlin, Meredith	Berlin, Sharon	Bernal, Luis
Bernstein, Sally	berres, Michael	Besmer, Wayne	Betz, Michael	Beven, Michele	Bicknell, Mary
Bieker, Christopher	Bierlein, John	Bigelow, Paul	Billetdeaux, Jamie	Billmaier, Michelle	Binns, K
Biondi, S	Bird, Karline	Bird, Stoney	Bishop, Aaron	Bishop, Scott	Blackburn, Cathleen

Blackstone, Randee	Blackwell, Kristi	Blackwell, Lynn	Blackwell, Toni	Blair, David	Blair, Frances
Blake, Anna	Blessing, Kate	Blue, Michael	Blue, Saphire	Blum, Nancy	Blumenthal, Robert
Blumer, Janet	Bobbitt, Van	Boger, Jerald	Bogie, Art	Boguske, Matthew	Bohn, Nina
Boland, Tim	Bolender, Mamie	Bollman, Ryan	Bond, Sandi	Bonfield, Barbara	Bonsignore, Antoinette
Bontecou, Leslie	Boone, Jeannine	Borba, Kathleen	Bordelon, Tika	Bornholdt, Anne	Borso, Pamela
Borst, Tom	Boss, Laura	Bost'N, Judae	Boteler, Diane	Bott, Amanda	Boudreau, Lucinda
Boulet, Lee And Carrie	Boury, Andrea	Bowdish, Caroline	Bowen, Patty	Bower, Janet	Bowers, Joan
Bowlby, Ed	Boyce, Bob	Boyer, Kristin	Braaten, Chrystyne	Bradley, Joyce	Bradley, Mark
Bradley, Simon	Bradshaw, Lael	BRAGSTAD, RICHARD	BRAGSTAD, RICHARD	Brant, Daniel	Braunwart, Tod
Bravender, David	Brayshaw, Julia	Brayton, Patricia	Breckenridge, F And N	Bremer, John	Brening, Kevin
Brennan, James	Brent, Patti	Brever, Susan	Bridwell, Betsy	Briggs, Julia	Bright, Teresa
Brinkhaus, Andrew	Brinkman, April	Britton, Craig	Bronson, Jeff	Brosman, Christina	Brostad, Erin`
Brouillette--Jobe, S	Brouillette--Jobe, Sandra	Brouillette--Jobe, Sandra	Brown, Alice	Brown, Denise	Brown, Edwin
Brown, Jennifer	Brown, Kelly	Brown, Marguerite	Brown, Nicole	Brown, Rebecca	Brown, Steven
Brownell, Basilia	Brumwell, Keith	Brush, Jaime	Bruun, Shari	Bryan, Mk	Bryant, Anita
Bubelis, Wally	Buch, Anthony	Buch, Tony	Buchanan, Brad	Buchanan, Carlin	Bucher, Mary
Buckley, Debra	Buczek, Judith	Budnik, Dave	Buer, Gro	Bukis, Karen	Bumford, Magdalene
Bunting, Diane	Burney--Jones, Sheba	Burns, John	Burns, Linda	Burns, Tim	Burnup, Debbie
Burr, Eric	Burrow, Jacob	Burwell, Carol	Burwell, Carol	Busch, Kristi	Bush, Randy
Bush, Sandra	Butcher, William	Butler, Elsamarie	Buys, Laura	Bye, Susan	Bykonen, Donald
Cabal, Heather	Caboose, Michael	Calhoun, Robin	Calkins, Cynthia	Calkins, Debra	Callaghan, Richard
Cameron, Cami	Campbell, Charles	Campbell, Frank	Campbell, Janet	Campbell, Julie	Campbell, Linda
Campbell, Liz	Campbell, Shannon	Caplow, Florence	Capwell, Deborah	Caren, Charlene	Carfagno, Michelle
Cargol, Amanda	Carlin, Marianne	Carlson, Joel	Caron, Catherine	Carpenter, Gerald	Carpenter, Sue Ellen
Carr, Mary	Carsey, Pamela	Carter, Bob	Carter, Dayle	Carter, Ed	Carter, Paulette
Carter, Stephanie	Caruzzi, Rick	Casey, Karen	Casey, Margaret	Caspers--Curl, Karen	Caspers--Curl, Karen
Castille, Pstrick	Castner, Rebecca	Chadwell--Gatz, Courtenay	Chambers, Terri	Chan, Guy	Chan, Kitshan
Chaney, David	Chant, Katherine	Chaplin, Carole	Chapman, Louann	Charters, Douglas	Chase, Gladys
Chasse, Joe	Chastain, Fred	Chauve, Ketsia	Chenault, Price	Chessman, Sarah	Chestney, Karen
Cheston, Mary	Chickman, Sue	Childs, Constance	Chinn, Shirley	Chiu, Kevin	Christina, Lillian
Christman, Matt	Christophers, Phil	Chung, Linda	Church, David	Cichlar, Gerald	Cieslak, Urszula
Ciske, Daniel & Sandra	Ciske, Sandra	Cito, Brian	Clancy, John	Clark, Christine E	Clark, Heinke
Clark, Howard	Clark, James	Clark, Julianne	Clark, Madisun	Clark, Roger	Clarson, Laura
Clay, Gretchen	Clemens, Roger	Clifford, Josephine	Coberley, Ken	Coffey, Patricia	Cohan, Linda
Coheh, Judith	Cohen, Judith	Cohen, Sidney	Cole, Cindy	Cole, Joan	Cole, Pat
Coleman, Timothy	Colley, Edward	Collins, Lauren	Collmer, Sarah	Colon, Jose	Colson, Lynn
Coman, Barbara	Condit, Stephen	Conlan, Mike	Conn, Patrick	Connell, Daryl	Conrad, Norm
Cook, Art	Cook, Jason	cook, klouise	Cooke, James & Jan	Coon, Edwin & Betty	Cooper, Trina
Cope, Wendy	Cope, Wendy	Cope, Wendy	Cordero, Ann	Corey, Barbara	Corkrum, Gordon
Cornell, Stephanie	Cornell, Wendy	Cotrell, Katharine	Cotta, Michael	Cottrell, Chris	Cottrell, Kanit
Countryman, Laurie	Coupez, Claire	Couture, Ray	Cover, Jane	Covert--Bowlds, Chris	Covert--Bowlds, Chris
Covington, Diana	Cowan, Keith	Cox, Bob	Cox, Lanie	Cox, Lorri	Cox, Margaret
Cox, Sharon	Cppk, K.	Crabtree, Lynn	Craft, Joelle	Craft, Joelle	Crafton, Laura
Craig, Laura	Craig, Laura	Crane, Arlin	Crawford, P.E.	Crawford, P.E.	Crawford, Tim
Crews, Mary Kay	Criddle, Jamie	Crimmins, Nancy	Cristofalo, Meg	Crocker, Layne	Crockett, Elizabeth
Crombie, Carolyn	Croshaw, Tracy	Cross, Cyndi	Crowder, Robert	Crowley, Marty	Croy, M August
Crozier, Van	Cruver, Edward	Csepreghy, Kinga	Culver, Marcia	Cundy, Don Singh	Cunliffe, Suzanne And Stephen
Cunningham, Elizabeth	Cunningham, Janette	Cunningham, Lynda	Cure, Cindy	Curry, Bill	Curry, Karen
Curry, Stephen	Curry, Stephen	Curtis, Colleen	Curtis, Hani	Curtis, Helen	Curtright, Shari
Cwinar, Julie	Cyr, Jean	Dahlberg, Nancy	Dahlberg, Nancy	Dahlgren, Shelley	Dale, Felicia
Dale, Garry	Daley, Suzann	Dalton, David	Damour, Kristi	Damron, Patricia	Dang, pearl
Danks, Lois	Dann, Janet	Dannenberg, Jennifer	Darcy, Kevin	Darden, Judy	Darden, Ruth
Darilek, Marilyn	Darst, Dolores	Dart, John	Daub, Elmer	Davidson, Bee	Davidson, Nora
Davies, Margaret	Davis, Ace	Davis, Allan	Davis, Edward	Davis, Heather	Davis, Jacqueline

Davis, Jerry	Davis, Jim	Davis, Larry	Davis, Linda Jean	Davis, Martin	Davis, Thomas
Davison, Donna	Davison, William	Dawning, Desdra	Dawson, Elizabeth	Dawson, Mark	Day, James
Dayton, Gary	de Balin, Mar_a--Teresa	De Gennaro, Ruth	de la Rosa, Marco	De La Tour, Shatoiya	De Rooy, Constance
De Weille, Karin	De Weille, Karin	Deal, Brandie	Deans, Ginny	Decktor, Shulamit	Declements, Mari
Defoe, Martha	DeGeorge, Rebecca	DeGrandchamp, Jan	deHart, Lyssa Danehy	Del Valle, Mercedita	DeLeon, Brian
Delmar, Roger	DeMartin, Renee	DeMers, Connie	Dempster, Michael	Denning, Asphodel	Deochoa, Malisa
Derleth, Penny	DeSantis, Megan	Detloff, Jude	Detmers, Jon And Linda	Dettlaff, Barbara	Deutsch, Eileen
Develle, Stephanie	Devincent, Jackie	Devine, Tom	Devlin, Felicity	Dick, Nicole	Dickerson, Brittany
Dickey, Kim	Dickey, Marilyn	Dicus, Laura	Dierdorff, Angie	Dieringer, Irini	Digiacomo, Ronald
DiLabio, Gena	DiLabio, Gena	Dilg, Patti	Dimmitt, Rafe	Dirks, Gary	Dishion, Diane
Dixon, Diane	Dixon, Keith	Dixson, Cynthia	Dobkevich, Judith	Dobson, kim	Doederlein, Susan
Dolan, Chuck	Dolan, Elaine	Dolin, Dorothy	Dolph, Claus & Phyllis	Donahue, Anita M	Donaldson, Jamie
Donaldson, Margaret	Doran, Edmund	Dorosz, Thomas	Doucette, Wayne	Douglas, Joan	Doulos, Peggy
Downing, Nancy	Dowson, Eleanor	Doyle, Patt	Dragoo, Judy	Drais, Sue	Drexler, Patricia
Druffel, Pauline	Druzianich, Dru	Du Gard, Dominique Coulet	Dubois, Barbara	Duey, Kurt	Dugaw, Mary Jo
Duke, Elizabeth	Duncan, Kate	Duncan, Scott	Dunn, David	Dunn, Sharon	Dunn, Sharon
Dunwoodie, Duane	durbin, stephen j	Durbin, Steve	Durga, Sharon	Durnell, Tim	Durovchic, Julie
Durr, Greg	Duskin--Smith, Martha	Duwors, Louise	Dyak, Miriam	Dye, Herbert	Dynega, Christopher
Earhart, John	Easterberg, Nancy	Eastman, Randy	Eaton, Denise	Eberly, Shelly	Eckels, Alison
Eckermann, Matthew	Eddington, Marianne	Eddy, John	Eddy, John	Eddy, John	Edison, John
Edwards, David	Edwards, David	Edwards, Dawn	Edwards, M.D., David L.	Edwards, M.D., David L.	Edwards, M.D., David L.
Edwards, Ola	Egan, Anne	eggers, j.	eggers, j.	eggers, k.	eggers, k.
Eichelberger, Stephen	Eisenfeld, Peter	Eister--Hargrave, Leah	Eklund, Laura	Ekstrand, Mary	Eldridge, Carol
Eley, Linda	Eliot, Scott	Elkins, Melissa	Ellenberger, Charles	Eller, Aisling	Eller, Gerald
Ellerby, Patricia	Elliott, Allen	Elliott, Valerie	Elliott, Valerie	Ellis, Kathryn	Ellison, Mike
Else, Carol	Ely, Don	Emerson, Charles	Emerson, Maria	Emerson, Richard	Emerson, Richard
Emineth, Tim	Emmons, Mary	Endsley, Byron	Enerson, Hal	Engler, Pamela	Erbs, Lori
Erdmann, Heidi	Erickson, Lynda	Erickson, Steve	Eschen, John	Espe, Gregory	Estes, Annemarie
Estes, Sue	Eul, L	Eulberg, Lois	Evans, Susan	Eventoff, Franklin	Everett, Robin
Everitt--Emery, Karen	Evich, Sammy	Fabano, Cecyl	Fagan, Melissa	Fahey, Barbara	Fahrenwald, Gill
Fain, Glenn	Fairburn, Dave	Faires, April And Joseph	Fairfax MD, George	Fairhurst, Richenda	Falcon, Ruth
Falcon, Ted	Faley, Geraldine	Falk, Diane	Fant, Suzan	Farhoud, Aisha	Faris, Leslie
Farrar, Susan	Farrell, Nancy Lee	Farrell, Phyllis	Feikema, Michele	Felber, Michael	Feldman, Andrew
Feleppa, Gregory	Feletar, Gary	Feletar, Linda	Felts, Terry	Fenwick, Steven	Ferandez--Llamazares, Heide
Ferkingstad, Don	Fernandez, Mary	Ferrier, Wendy	Feyk, Craig	Feyk, Craig	Feyk, Craig
Field, Roger	Fields--Lardie, Wendy	FIFE, KEVIN	File, Peggy	Filley, Jasmine	Finch, Carolyn
Finch, Suzann	Fink, Charles M.	Finley, Aliza	Finn, Andrea	Fischer, Brian	Fish, Marjorie
Fisher, Judith	Fisher, Karen	Fisher, Maylin	Fithian, Bruce	Flegel, Rick	Fleming, Leslie
Fletcher, Keith	Fletcher, Monica	Fletcher, Randall	Flothe, Greg	Floyd, Bryant	Flury, Lois
Fly, Peggy	Flynn, John	Flynn, Marcia	Flynn, Melissa	Foland, Marvin	Foley, Frances
Follett, Carol	Forbes, Micky	Forbush, Debby	Forsberg, Bruce	Forschler, Frederick	Fortner, Marty
Fosburgh, Eric	Foss, Jessine	Foster, John	Foster, Kelsey	Foster, Tim	Foster, Vince and Dianne
Foster, Vince and Dianne	Fought, Mary	Foutch, David	Fowler, Ashley	Fox, Larry	Fox, Larry
Fox, Raymond	Fox--Middleton, Steven	Fraik, Joan	Francis, Hailey	Francis, Hailey	Francis, Jeanann
Francisco, R	Frank, Dame	Franklin, Jennifer	Franklin, Luther & Martha	Franko, Glenn	Franks, Larry
Franzmann, Paul	Freeland, Frederick	Frei, Katie	French, James	Frey, Katie	Frey, Mark
Fritch, Alyce	Frith, Richard	Fritts, Heidi Mcbride	Froebe, Jillian	Frost, Scott	Frymire, Jack
Fuller, Deena	Fuller, George	Fulton, Janet	G, G	g, g	G, G

G, G	G, K	G., Nick	Gainer, C	Gallagher, Kevin	Gallery, Jillian
Galushko, Sergey	Gamblewood, Jolahna	Gammon, Julia	Gandolfo, Deborah	Gannett, Mark	Ganz, Nona
Garcia, Charlie	Garcia, Denise	Garcia, Eduardo	Garcia, Janette	Gardner, Alicia	Gardner, Peggy
Garg, Anu	Garland, Emily	Garner, Lynn	Gartner, Crystal	Gasparach, Fred	Gause, Jacqueline
Geiger, Joseph	Gelder, Donna	Genest, Karen	George, Coleen	George, Diane	Geraghty, Cassie
Gergen, Blake	Gerhard, Dan	Gersten, Ken	Geyman, Emily	Ghormley, James And Liane	Gibson, Mary Jane
Gibson, Nathan	Gieber, Jayna	Gil, Kendra	Gilbert, Lindsay	Gillmer, Marianne	Gillooly, Niele
Gilman, Daniel	Gilroy, Bryan	Gingerich, Rodney	Ginsburg, Joe	Girvin, Lila	Gish, Dennis
Gisi, Mikel	Gisi, Mikel	Gispanski, John	Githens, Micah	Glanzman, Kiwibob	Glaser, Patsy
Glasier, Linda	Glaskova, Lena	Glass, Gail	Glasser, Hannah	Gleason, Louise	Glode, Jack
Glover, John	Glover, Julia	Goad, Chris	Godzich, Mika	Goebel, John	Goertzel, John
Goglio, Remy	Goldberg, Laura	Goldberg, Marshall	Goldberg, Michael	Goldberg, R. David	Golde, Marcy
Goldthwait, Barbara & John	Golley, Linda	Gonzalez, Carol	Good, Linda	Goodpaster, Dustin	Goodwin, Nancy
Gorbanyoa, Yuliya	Gorbanyova, Yuliya	Gordon, Jan	Gordon, John	Gordon, Marianne	Gorton, David
Goss, Alice	Gossard, Chris	Gould, Marilyn	Gould, Tim	Goulden, Margie	Gowens, Nancy
Grafe, Steven	Graham, Justen	Graham, Lynn	Grannis, Christopher	Grant, Suzanne	Grassl, Richard
Graves, James	Gravette, Kristina	Graviette, Sandy	Gray, Alice	Gray, Judy	Gray, Todd
Grayland, Victoria	Greathouse, Dennis	Green, Elaine	Green, Harold J.	Green, Jack	Green, Jeffrey
Green, Joel	Green, Steve	Green, Steve	Green, Sue	Greenberg, Lawrence	Gregg, Carolyn
Gregg, David	Gregg, Henry F	Gregg, Loula	Gregory, Brian	Gregory, George	Grenfell, Patricia
Grieser, Kenneth	Grieser, Kenneth and Joan	Griffin, Kim	Griffith, John	Grimley, Daniel	Grimm, Robert
Grobelny, Julie	Groom, Gene	Gross, David	Grunkemeyer, Brian	Guard, Mary	Gudowski, Pat
Guenther, Mark	Guerrero, A Leon	Guerrero, Peter	Guerrero, Susan	Guillot, Doug	Gulden, Ingrid
Gunderson, Cathy	Gunderson, Paula	Gunn, Clarence	Gunn, Gerri	Guobis, Thomas	Guros, John
Gussin, Larry	Gustafson, Charles	Gustafson, Judith	Gustafson, Maureen	Guthrie, David	Gutsche, Christopher
Guy, Julianna	Guy, Tim	Guyll, Lisa Smithhart	Guyll, Lisa Smithhart	Gylland, Kathleen	Gyncild, Brie
Haas, James	Haas, Karen	Habel, Sarah	Hablewitz, David	Hackenberg, Karen	Hackman, James
Had, Marianne	Hadlock--King, Josephine	Hafer, Sarah	Hagan, Sena	Haggard, Margot	Haggin, Bart
Haggin, Charles	Haglund, James	Haglund, James	Hahn, Jonny	Hahn, Julie	Haley, Stacia
Hall, Heather	Hallett, Chad	Halley, Karin	Hallman, Holly	Hallonquist, Robyn	Halpern, David
Halpern, Lisa	Ham, Michele	Hamer, Suzanne	Hamill, Sarah	Hamilton, Cynthia	Hamilton, Lindsey
Hamilton, Shari	Hamlet, Richard	Hand, David	Handewith, Ruth	Hankins, David	Hanlon, Linda
Hann, Jason	Hanna, Shirley	Hannan, Margaret	Hansen, Jess	Hansen, Paul	Hanson, Donna
Hanson, Mary	Hanson, Sam	Hanson, Vickie	Happy, Emily	Harbert, Tanya	Hardee, Diane
Harlan, Rick	Harmon, Paul	Harney, Denis	Harper, Shannon	Harper, Wendy	Harr, Kendal
Harr, Susan	Harrington, Diane	Harris, Dianne	Harris, Helen	Harris, Holly	Harris, Pamela
Harris, Susan	Harrison, Randy	Harrison, Sally	Hart, Matthew	Harter, Nancy	Hartgraves, Pamela
Hartgraves, Pamela	Harty, Florence	Harvey, Brianna	Harvey, Jo	Hashmi, Margaret	Hathaway, Jerry
Hatten, Rick	Haugen, Iver	Hauser, Jane	Haverlock, Robert	Hawes, Robert	Hawk, Ronald
Hawkes, Bobbie	Hayes, Glenna	Hayes, Jenny	Hearne, Leonard	HEATH, Brian	Heath, Bryan
Heath, Laura	Heavyrunner, Mia	Hedahl, B J	Hedgepath, Janet	Hedgepath, Janet	Hedger, Lloyd
Heiler, Terri	Heiman, Wendy	Heimbigner, Connie	Heimsness, Daryl	Heller, Adam	Hembree, Christy
Henderson, Cj	Hendrickson, Terrill	Hennessey, Patricia Marion	Hentrich, Julie	Hepfer, Anne	Herberg, Raimund
Herfindahl, Anne	Herman, Patrick	Hermes, Gerald	Hernandez, Carrol	Hernandez, Shannon	Herndon, Sandra
Herner, Ed and Bonnie	Herr, Dorcas	Hersch, Steve	Hesterberg, Tim	Heyneman, Amy	Heywood, David
Heywood, J David	Heywood, Susan	Hickman, Jennifer	Hickner, Peter	Higgins, Andrea	Higgins, Tom
Hightower, Mike	Hildreth, Maureen	Hildreth, Maureen	Hildreth, Maureen	Hildreth, Patrick	Hilgenberg, Robert
Hill, Barbara	Hill, Belinda	Hill, Belinda	Hill, Jessica	Hill, Michael And Barbara	Hill, Pamela
Hill, Stephen	hines, judy	Hines, Nancy	Hinton, Colleen	Hirsch, Robin	Hirst, David
Hirst, Eric	Hitchcock, Eliza	Hittler, Betty	Hittler, Betty	Hittler, William	Hoban, Marilyn
Hoblitt, Marian	Hoesel, Walter	Hoffman, Danielle	Hoffman, Jessica	Hoffman, Marianne	Hofstrand, Lorene
Holcomb, Lorraine	Holcomb, Peter	Holder, Mary Ruth	Holkup, Janice	Holland, Mervin	Holland, Tanya

Holly, Corey	Holman, Robert	Holmberg, Daniel	Holt, Karen	Holtz, Eric	Holtzman, Julie
Holtzman, Robert	Holz, Lynne	Holz, Robbie	Hood, Carolina	Hooks, Dave	Hooks, Dave
Hooper, Ruth	Hoover, Karen	Hoover, Karolyn	Hoover, Kimberly	Hopkin, John	Hopkins, Katie
Hopkins, Paul	Horman, Nancy	Horn, Jane	Horton, Keith	Horwitt, A	Houghtaling, Leonard
Howald, William	Howard, Gwen	Howard, Gwen	Howard, Karen	Howard, Toni	Howe, Jared
Hoyopatubbi, Patti	Hsu, Ting Ting	Hubbard, Audrey	Hubenthal, Graham	Huddlestone, Laura	Hudon, Charlene
Hudson, Dorothy & Edward	Huelsberg, Carole	Huey, Marcia	Huey, Marcia	Hughes, Laurel	Hulbert, Susan
Hulick, Stephen & Kathleen	Hulick, Stephen & Kathleen	Hulick, Stephen and Kathleen	Hultman, Natalie	Humphrey, Kyra	Humphrey, Linda
Hunner, Walter	Hunt, Kathleen	Hunter, Krista	Hurd, Julia	Hurlburt, Richard	Hurst, Darcia
Hurst, Eli	Hutchinson, Barry	Hutchison, Cathy And Eric	Hutchison, Rev. Brian	Huxel, Kent	Hyde, Jim
Hyland, Kerby	Hylton, Barb	Ichikawa, Jeri	Igoe, Pauline	Ii, Lozz Venus Starseed	Iluna, Mana
Ilvonen, Tina	Imberton, Marie--France	Imes, Roger	Ionina, Kate	Ionina, Kate	Irish, Lura
Irle, Mikayla	Isenberg, Lorna	Izeppi, T	J, S	Jack, Jan	Jackels, Susan
Jacks, Antoinette	Jacks, Toni	Jackson, David	Jacky, S	Jacobs, Anthony	Jacobs, Georgene
Jacobs, Nancy	Jacobson, Carole	Jaeger, Michael	Jaehning, Jane	James, Julia	James, Wendy
James, Wendy	Jamison, Ian	Janer, Marta	Janes--Allen, Ruth	Jarrett, Lee	Jarrett, Lee Ann
Jasinski, Jenny	Jeffers, Lisa	Jeffers, Lisa	Jeffrey, Mary	Jennings, Peggy	Jensen, Catherine
Jensen, Craig	Jensen, Jack	Jobb, Eileen Christine	Joel, Taryn	Johns, Bryan	Johns, Veronica
Johnsen, Frank	Johnson, Daniel	Johnson, Gaillard Lee	Johnson, Gerald	Johnson, Jacob	Johnson, Joel
Johnson, Keith & Karen	Johnson, Lee	Johnson, Lorraine D.	Johnson, Matt	Johnson, Nicholas	Johnson, Nicholas
Johnson, Pamela	Johnson, Richard	Johnson, Stacey	Johnston, Beverly	Johnston, Dorothy	Johnston, Holly
Johnston, Karen	Johnston, Lloyd	Johnston, Lois	Johnston, Maureen	Jokela, Brian and Mary	Jokela, Brian and Mary
Jokela, Mary	Jolliffe, Share	Jones, Clayton	Jones, Danny	Jones, Debby	Jones, Jessica
Jones, Kathleen	Jordan, Theresa	Jorgensen, Edris	Joseph, Joann	Jowdy, Joe	Joy, Amber
Joyce, C J	Joyce, C J	Julien, James	Junkin, Duane	Junkin, vivian	Junkin, vivian
Junkin, Vivian	Jurries, Philip	Justis, Joy	Kaczmarczyk, Robert	Kaemke, Ernst	Kane, Pat
Kane, Saralee	Kangley, Blair	Karas, Lisa	Karlsda, Sylvie	Karlson, Fred	Kastner, Cheralynne
Kastner, Cheralynne	Kato, Josh	Katz, Aviva	Kaufman, Arthur	Kaufman, Ronald	Kaumans, Troy
Kavage, Sarah	Kay, Susan	Kaylen, Sharon	Kearney, Linda	Kearney, Linda	Keefe, George
Keefer, Kelly	Keegan, William	Keeley, James	Keeley, Jim	Keiser, K	Kelley, Sheila
Kellogg, Bill	Kellow, Betty	Kelly, Karen	Kelly, Kristin	kelly, shana	Kelman, Barry
Kempler, Andy	Ken, Kat	Kenbok, Joyce	Kendall, Gordon	Kendall, Joan	Kendall, John
Kennedy, Alys	Kenney, Sherri	Kenny, Patricia	Kepner, Jane	Kerslake, Bruce	Kessel, Gerald D
Kessel, Gerald D	Kessinger, Gerald	Kessinger, Jerry	Kessler, Harrie	Kestell, Kathy	Keyt, Barbara
Kichler, Staci	Kiewit, Jesse	Kildall, Bill	Kilgore, Nancy	Kilgore, Susan	Killian, Elaine
Kincaid, Deianira	King, Arline	King, Christopher	King, Christopher	King, Nancy	King, Noemia
King, Susan	King, SuZ	Kingery, Karissa	Kingery, Karissa	Kiniry, Ed	Kinnaman, Dave
Kinzie, Amber	Kirby, Craig	Kirishian, Jeanette	Kirk, S	Kitson, Jamie	Kiver, Eugene
Kjaerulff, Maria	Klein, Kathleen	Kliment, Wendy	Klinski, Jaz	Klosterman, Laura	Klotz, Nancy
Knechtle, Carol	Knickrehm, Kristy	Knight, Marsha	Knoll, Leonard	Knoll, Linda	Knopp, Jason
Knoth, Lorrie	Knudson, Dorothy	Knutsen, Steve	Kocer, Dianne	Koehnen, Mark	Koeller, Pam
Koester, Martha	Kohn, Teresa	Kolff, Helen & Kees	Kong, Diane	Kongs, Julie	Kongs, Steve
Konis, Peter	Koomjian, Cassie	Koomjian, Cassie	Kormendy, Marie	Korn, Meryle	Korn, Meryle A.
Korn, Meryle A.	Kors, Jeanette	Koski, Jessica	Kozlowski, Ted	Kr, Mu	Krafft, Alyssa
Kramer, Charles	Krause, Fayette	Krause, Patricia	Krieger, Karen	Kroger, Jane	Krueger, Suzanne
Kruger, Gary	Kruis, Diana	Kruse, Tom	Kuciej, Walter	Kuechmann, Mariha	Kuhns, James
Kuhns, Randall	Kulp, Angela	Kulp, Laurie	Kunkle, Aaron	Kuntz, Mike	Kus, John
Kus, John	Kuzma, Ken	L, Anna	La Piosnt, Don	LaBuda, Susan	Ladd, Marc
LaGasse, Jeffrey Paul	Lagerberg, Rose	Lagerloef, Marcia	Lagerquist, Melinda	Lahaye, Fran	Laidlaw, Julie
Laik, Jeff	Laik, Judith	Lair, Alyssa	Laise, Katherine	Lake, Keith	Lamar, Eileen
Lamb, Barbara	Lamb, Roger	LaMoure, Donald	Lamp, Terry	Landen, Susan	Landis, Cynthia
Lane, Michael	Langford, David	Langford, Lora	Langston, Kim	Lanie, Beth	Lansden, Marc

Lanskey, Marcus	LaPorte, Candace	Lapseritis, Kewaunee	Lardie, Wendy	Larkins--Strawn, Marianne	Larrick, Maggie
Larson, Gary	Larson, Keith	Larue, Erik	Lasalle, Susan	Lasseter, Joy	Last_Idaho, First_Idaho
Lattin, Stan	Lau, Barbara	Laursen, Laurie	Lavington, Laura	Lawler, Roxanne	Lawlor, Bonnie
Lawrence, George	Lawrence, George	Lawson, Michael	Lazaroff, Ann	Lazzarini, Howard	Lazzarini, Howard
L'Carttier, Avona	L'Carttier, Avona	Le Vee, Ilene	Leckenby, Patricia	lee, chris	Lee, Scott
Leeper, Kimberly	Lefevers, John	Lefevre, Neatha	Lefevre, Neatha	Lehner, Lora	Lehtinen, Jean Marie
Leigh, Tara	Leija, Phillip	Lemberger, Aviva	Lengel, Elizabeth	Lenhart, Jennifer	Lennartz, D.
Lenski, Francis	Lentz, Hugh	Lenzen, Patricia A	LeonJones, Miranda	Leptich, Dave	Lertzman, Sarah
Leuning, Eldon	Levalley, Lon	Levengood, Mark	Levey, Michelle	Levin, Brian	Levine, Sharon
Levine, Susan	Lew, Karen L.	Lewin, Larry	Lewis, Christy	Lewis, Evelyn	Lewis, Geary
Lewis, Joyce	Lewis, Nancy	Lewis, S.	Lewis, Sharon	Leyrer, Bill	Leyrer, Bill
Liesemer, Kirk & Kate	Likins, Jessica	Lincoln, Lynne	Lind, Laura	Lindberg, Rachel	Lindberg, Robert
Linden, Michael	Lindsay, Cathy	Lindsay, Doug	Lindsay, James	Lindsay, Linda	Lindsay, Paula
Lindsey, J J	Lindstrom, Karen	Link, Virgene	Linn, David	Lish, Jeannine	Lister, Dolly
Liszak, Jerry	Little, Robin	Lively, Mary	Livingstone, Amy	Locke, Jack	Lockhart, Jack
Lockwood, George	Loerch, Ronna	Loeschen, Doris	Lofquist, Erland	Lofton, Saab	Logan, Corina
Logan, Kerry	Logan, Morag	Logan, Robert	Logan, Teresa	Lohavanichbutr, Kamol & Pawadee	Lohavanuchbutr, Kamol
Lohmann, Robert	Lohrer, Marjorie	Long, Jerrold	Long, Kathryn	Long, Kelsy	Long, Linda
Loomis, Gregry	Looney, William	Lorenz, Lara	Lott, Alan	Lou, Ray	Loucks, Dan
Loughj, Dana	Love, Kristin	LovellFord, Peggy	Loveridge, Connie	Low, Grant	Low, Sammy
Lowe, Helen	Lowell, Daniel	Lowther, Larry	Loynd, Kylie	Lubiak, Stanley	Lucerne, Eve--Marie
Lucianna, Mark	Ludden, David	Ludlam, Travis	Luengo, Lisa	Lund, Taffy	Luscher, Jeremy
Luther, Sue	Luu, Jayson	Luxton, Larry	Luzik, Kay	Lyle, Kathy	Lyman, Michael
Lynch, Sandy	Lynn, Bethany	Lynn, Sherri	Lyon, Jerry	Lyons, Cynthia	Ma, Frederick
Maani, Michelle	Maas, Monique	MacArthur, June & Ronald	MacDonald, Jennifer	Macdougall, Mike	Maciejewski, Gail
Mackenzie, Charlene	Macko, Peggy	Maclean, Rebecca	Macleod, Dianna	Macleod, Keith	Macrae, Diann
Macrae, Duncan	MacRae, James	Macslarrow, Jack & Dorothy	Maeda, Angela	Magdalik, Gary	Maglietti, Brian
Magliola, Lawrence	Magner, Millie	Mahar, Mary Lee	Mahder, Debbie	Mahlis, Larry	Majeske, Stefan
Majour, Renee	Male, Dara	Males, Jerahmeel Rueben	Manetti, Christina	Mann, John	Manning, Mary
Mannix, Sharon	Manns, Timothy	Marceaux, Danielle	Marceron, Dennis	Marett, Susan	Margolis, Margo
Mariano, Carol	Marino, Nate	Marioni, Paul	Markle, Barry	Markley, Shannon	Marley, John
Marrs, Christopher	Marrs, Marie	Marshall, Carolyn	Marshall, Cassi	Marshall, Keela	Marshall, Keela
Marshall, Rick	Marshall, Rick	Martens, David	Martin, Andrew	Martin, Cheryl	Martin, David
Martin, Gerry	Martin, Greg	Martin, Jeff	Martin, Jr, Patrick	Martin, Ken	Martin, Liza
Martin, Melodie	Martin, Meryl	Martin, Millard	Martin, Nathalie	Martinez, Roberta	Martinson, Julie
Martinson, Julie	Marx, Janet	Marye--Baker, Taylor	Maseda--Gille, Sheila	Mason, Denise	Mason, Maryann
Massey, Linda	Mast, C	Masters, Mary	Mateer, Gayle	Matheson, Stacee	Mathews, Brian
Mathias, Mark	Matson, Kathleen	Matthews, David	Mattox, Linda	Maupin, Jorge	Maxfield, Bruce
May, M S	Mayer, Corey	Mayer, David	Mayer, Melody	Mazza, Valentina	Mc Guire, Tim
Mcaninch, Edward	Mcaninch, Edward	Mcbride, Robert	Mccandlish, Sheila	Mccann, Kris	Mccarthy, Elizabeth
Mcchesney, Evelyn	McClellan, Chris	McClellan, Christopher	McClintock, Gloria	Mccluskey, Sue	Mcclusky, Campbell
Mcconaghy, Michael	Mcconaughy, Jeff	McConaughy, Jeffery	Mccord, Craig	Mccormick, Helene	Mccormick, Mike
McCormmach, Lesley	Mccoy, Debbie	Mccoy, Louellen	Mccoy, Louellen & Miles	Mccrea, Thomas	Mccrea, Thomas
Mccrone, Charles & Malena	Mccune, Marla	Mccurry, Sally	Mccutcheon, Meghan	Mcdaniel, Cheryl	McDevitt, David
Mcdonald, Julia	Mcdonald, Kimberly	Mcdonough, Rebecca	Mcelroy, Cameron	Mcfarland, Charlene	Mcfarlane, Brent
Mcgarry, Carl	Mcgee, John	Mcgibney, Matthew	Mcglannan, Dorian	Mcgowan--smith, Lorna	Mcguire, Henry
Mcgunagle, William	Mchugh, Jamie	Mcinturff, David	McKee, Christianne	Mckim, Kitty	Mckinley, Stacey
Mckinney, Karyn	Mckinney, Kitty	Mckinney, Susan	Mckinstry, David	McLaughlin, Frances	Mclaughlin, Gary
McLaughlin, Susan	McLemore, Janice	Mcleod, Daniel	Mcmackin, Mary	McMahon, Kevin	Mcmannis, Daniel
McMurry, Nan	McNabb, Cindi	Mcnae, Marjorie	Mcneely, Camille	Mcneff, Catherine	Mcneil, Mona

McPherson, Roger	McPherson, William	Mcpherson, William	McSorley, E.	Mcweeny, Devon	Mcwillis, Sharon
Meacham, Michael	Meacham, Michael	Mead, Tamara	Meany, Phil	Meany, Phil	Medlin, Ryann
Meehan, Marcella	Meehan, Sonny	Mehemed, Sharleen	Melik, Ella	Mendoza, Jean	Mendoza, Laura
Mensher, John	Mercier, Lyssa	Meredith, Tracy D.	Merritt, Heather	Meshke, Beth	Messer, Christine
Messinger, Lisa	Metcalfe, Janel	Methven, Boone	Meton, Nancy	Meyer, Amanda	Meyer, Carol
Meyer, Daniel	Meyer, Edgar	Meyer, Emily	Meyer, Jacob	Meyer, Lenore	Meyer, Margaret
Meyer, Pamela	Meyer, Robert	Michaels, Brenda	Michaels, Desiree	Michaels, Lara	Michaelson, Raelyn
Michalove, Carla	Michelson, Barbara	Mick, Debbiee	Mickey, Susan	Middleton, Anne	Middleton, Herman
Miesel, Bruce	Miglino, William	Mike, Schutt	Miknaitis, Gajus	Milazzo, Todd	Miller, Anna
Miller, Bonnie	Miller, Jeanne	Miller, Jerry	Miller, Marilyn	Miller, Mary Ellen	Miller, Matthew
Miller, Sharon	Miller, Sharon	Miller, Sharon	Milligan, Don	Milligan, Keith	Mills, Edward
Milstein, Leslie	Milton, Beth	Misarti, Greg	Mitchell, Darius	Mitchell, Heather	mitchell, kathleen
Mobeck, Melissa	Mock, Alex	Moller, Richard	Monaghan, Dina	Monte, Gerard Del	montez, Heidi
Montgomery, Betty	Moon, Sue	Moore, Benita	Moore, Jeannette	Moore, Kerry	Moore, Larisa
Moore, Ron	Moore, Ron & Marci	Moore, Shirley	Morehead, Maria	Morehead, Maria	Moreland, Tom
Morgan, Chris	Morgan, J. Dean	Morgan, Katherine	Morkill, Barbara	Morris, Eleanor	Morris, Elizabeth
Morrow, France	Mortelmans, Hans	Morton, Doug	Moskowitz, Jacqueline	Mosniak, Amanda	Motteler, Catherine
Mower, Amy	Moyer, Ann	Muenster, Mark W.	Mueses, Margarita	Mulcare, James	Mulcare, James
Mulcare, James	Mulcare, James	Mulcare, James	Mulcare, James	Mullen, Kay	Munn, Donald
Murphy, Donna	Murphy, Peter	Murray, Elizabeth	Murray, Susanne	Musche, Ann N Alan	Musgrave, Lee
musgrove, aubrey	Mutal, Morris	Muzzey, Ann	Myers, Suzanne	Myhre, Becky	Myhre, Paul
Myklestad, Erik	Myles, Neil	Mynar, Jim	Nakamura, Alex & Pauline	Nash, Eleanor	Nash, Lisa Drost
Naught, Duane	Naylor, Brent	Neal, Becky	Neal, Keith	Neal, Ursula	Neevel, David
Nehring, Paul	Neill, Danne	Nelson, Bryan	Nelson, David	Nelson, John	Nelson, John
Nelson, Katherine	Nelson, Katherine	Nelson, Laura	Nelson, Nancy	Nelson, Richard	neu, kelly
Newbury, Mary	Newcomb, Tim	newland, max	Nicholls, Nance	Nichols, Jane	Nichols, Kate
Nichols, Laure	Nichols, Ronald	Nichols, Stephen	Nichols, Terry	Nicolai, Jane	Nielsen, Marilee
Niendorf, John	Niesen, Andreas	Nikolas, Virgil	Niles, Amanda	Nixon, Diane	Nizhnikov, Arne
Nizzardi, Alicia	Noll, Richard	Nordby, Pat	Norick, Robert	Norman, Dennis	North, Janette
North, Michelle	Novak, Kim	Novak, Vanita	Novick, Christine	Nuechterlein, Laura	Nydegger, Nancy
Oberlander, Jane	Obert, Leonard	O'Brien, Kate	Ochoa, Malisa	O'Connell, Mary--Margaret	O'Conner, Crista
O'Connor, Nicolette	Odegard, Thomas	O'Dell, Scott	O'Donnell, Ina	O'Donnell, Kristi	O'Donnell, Sue
Offutt, Lynn	Ofteness, Tore	Ogata, Constance	Ogden, Charles & Carol	Ogilvy, Heather	Ogle, Peg
O'Hara, Kathleen	O'Keefe, Dan	O'Keefe, Dan	Okeefe, Owen	Olivera, Guido	Olsen, Cynthia
Olson, Bryan	Olson, Dennis	Olson, Rita	Olson, Sandra Hoffelt	Olson, Wade	O'Neal, Mel
Oneill, Pat	Onufer, Mary	Oppenheimer, Lina	Oppfelt, Tina	Ordonia, Fel	O'Reilly, Forrest
Orife, Rebecca	Ormbrek, Beverly	Orme, Kevin	Oron, Assaf	O'Rourke, Andi	Orshansky, Herb
Ortiz, Javier	Orton, Douglas	Osborn, Marsha	Osbrn, Marsha	Ostrom, Karl	Otis, Anne
Otto, Alexxis	Otto, K	Otto, Tyler	Oulman, Lynne	Overbey, Joel	Overton, Marilyn
Overturf, Jeff	Oviatt, Robert	Owen, Bob	Owens, Melissa	Pacheco, Helen	Packard, Elaine
Page, Charles	Page, Nicholas	Paisley, Mary	Palka, John & Yvonne	Palmatier, Ronald	Palmer, Jane
Palmer, Michael	Palumbo, Julieann	Parcel, Randal	Parikh, Anand	Parker, Deborah	Parker, Ky
Parker, L	Parker, Michael	Parker, Stan	Parker, Torun	parks, anne	Parks, Don And Kristin
Parroitt, Maureen	Parsley, Patricia	Parsons, Perry	Partsch, Cornelius	Pascal, Jeanne	Patrie, Milton
Patten, Krista	Patterson, Eugenia	Patterson, Gerald And Phyllis	Patterson, Laura	Patterson, Patrick	Patton, Donald
Pauley, Jean	Pauley, Jean	Pavcovich, Michelle	Pawtowski, Yvonne	Paxson, M. C.	Payton, Fay
Peacey, David	Pearson, David	Pearson, David	Pearson, Rachel	Peck, Saskia	Peck, Saskia
Pederslie, Sharon	Pellegrino, Ron	Pellett, Steve	Pelotas, juan	Pena, Joann	Penchoen, Gregory
Penhallegon, David	Pennington, Sharyn	Penta, Albert	Perez, Aldora	Perez, Jasmine	Perkins, Anne
Perkins, Christie	Perkins, Johanna	Perkins, Sandra	Perkins, Sandra	Perret, Jennifer	Perrin, Mimi
Perron, P	Persky, William	Perstein, Angela	Peters, Thom	Peterson, Erwina	Peterson, Gayle
Peterson, Glen	Peterson, Joanne	Peterson, Kristina	Petrarca, Sandra	Petrie, Lynette	Pfeninger, Brianna
Pfister, Alice	Phariss, Victoria	Phillips, Amy DyAnne	Phillips, Dave	Phillips, Glenn	Phillips, Marilyn
Phillips, Suzanne	Phinney, Barbara	Phreaner, Robert	Pickering, Karen	Pierce, Betty	Pierini, Katherine

Pilger, Carrie	Pinson, Luan	Pion, Carolyne	Pittman, Jennifer	Plancich, Richard	Plitt, Kathryn
Ploger, Jim	Polley, Margo	Poncy, Michael	Ponta, David	Porch, David	Porrini, Karin
Posmantur, Amy	Post, Tina	Post, Tina	Potter, Amanda	Potter, Bethany	Potter, Karl & Antonia
Potts, Paul	Powell, Erin	Powell, Lance	Powers, Mary	Powter, Dorothy	Pratt, Debbi
Pratt, Ted	Prentice, Hanna	Prestage, Susan	Preston, Dr. Jenifer	Preszler, Keith	Price, Jack
Price, Jack	Price, Mara	Primrose, John	Primrose, William	Prior, Ellen	Procter, Kathy
Provost, Lin	Puffer, Deidre	Purdy, Liz	Queen, John	Quick, Jill	Quinlan, Vona
Rabenstein, Lynn	Raczkowski, Ron	Rader, Neil	Radovich, Gordon	Rahm, Don	Rain, Eden
Rains, Pamela	Ralston, Judith	Ramon, Laura	Ramos, Miguel	Rangel, Mary Anne	Rangel, Mary Anne
Rappaport, Ann	Rasmussen, Patricia	Rausch, Mary	Raven, Warren	Rawlings, Maureen	Rawlins, Mary
Ray, B	Rayniak, Bart	Read, Barbara	Read, Don	Read, Don	Read, Helen
Reading, Toniann	Reber, Jason	Rector, Julie	Redd, Ray	Redmond, Jeanette	Redmond, Mark
Reed, Jennifer	Reed, Lesley	Reeeves, Andrew	Reese, Timothy	Reeves, Valerie	Regan, Nora
Reid, Diane	Reid, Douglas	Reilly, Linda	Reitz, James	Remington, Margaret	Repeta, Lawrence
Repeta, Lawrence	Resnick, Karelina	Resnick, Mark	Ress, Richard	Reuter, Kalama	Rew, Robby
Reynolds, Adele	Reynolds, Elizabeth	Reynoldson, George	Rhoads, Mason	Rhyans, Hiawatha	Ricca, John
Ricciardi, Salvatore	Richard, Joanne	Richardson, Carol	Richardson, Lea	Richter, Laney	Rickman, Katherine
Rieger, Reingard	Riek, Bob	Riek, Marsha	Rietz, John And Marguerite	Rigano, Kimberly	Rigoulot, Elizabeth
Ring, Charles	Rintoul, Micheal	Risser, Susan & Mr. Peter	Rivas, Shirley	Rivera, Janice	Rizzo, Elizabeth
Robbins, Barbara	Roberg, Kathryn	Roberge, Marie	Roberson, Lynne	Roberts, Cal & Diana	Roberts, H
Roberts, Paul	Robertson, Don	Robertson, Nathan	Robinson, Anne	Robinson, Barbara	Robinson, Dave
Robinson, Sarah	Rocha, Madeleine S	Rochelle, Deborah	Rock, Kibby	Rodgers, Patricia	Rodgers, Sandra
Rodman, Constance	Roehm, Dave	Roesijadi, Marissa	Rogers, Bill	Rogers, Karen	Rohrer, Bonnie
Rohrer, Chuck	Rolf, Margo	Rolf, Margo	Rollis, Hope	Roloff, Tami	Roloff, Tami
Romberg, Harry	Romero, Joseph	Romero, Mj	Romoser, Mary	Romstad, Kris	Ronco, Philip
Rosato, Mickey	Rose, Doreen	Rosenberry, Rick	Rosenfeld, Daniel	Rosenkotter, Barbara	Rosenkotter, Barbara
Rosenkotter, Barbara	Rosenkotter, Barbara	Roskowyk, Patrick	Ross, Catherine	Ross, Ina	Ross, Keith
Roth, John	Rothenberg, Florie	Rouleau, Roger	Roundy, Suzanne	Rowe, Alice	Roxburgh, Janet
Royer, Carol	Rubcic, Daniele	Rudolph, Christine	Rudolph, Joyce	Ruggiero, Emma	Ruha, Catherine
Rullman, Linda	Rumiantseva, Elena	Rumley, Sharon	Rummerfield, Michael	Runkle, Vinse	Runnion, Venetia
Rushforth, Dennis	Rushing, Deb	Russell, Julia	Russo, Jay	Rutherford, Jim	Ryan, Terrance
Rylko, Teresa	S, M	Saalwaechter, Susie	Saarinen, Tamara	Saccomanno, Vienna	Saccomanno, Vienna
Sadek, Deena	Sagare, David	Sager, Robert	Sahm, Teri	Sailer, John	Salter, Sarah
Sanchez, Tatiana	Sandberg, Esther	Sands, Becky	Sandvig, Daniel	Sandwell, Susan	Sanford, Robert
Sargent, Jean	Sather, Steven	Saunders, Sharon	Saxe, Terry	Scaief, Margaret	Scarborough, Nelson
Scauzillo, Suzzanne	Scavezze, Barb	Scavezze, Barbara	Schaeffer, Kathleen	Schaetzel--Hill, K	Schalka, Julie
Scharbach, John	Schaufler, Paul	Scheer, David	Scheid, Keith	Schepman, Colleen	Schetzer, Kathryn
Schiefelbein, Lola	Schiesl, Dave	Schiller, Aaron	Schmidt, Barb	Schmidt, Kevin	Schmidt, Thomas
Schmitt, Dianne	Schmitz, Holly	Schnabel, Dan	Schneider, Dan	Schneider, Gina	Schneider, Wanda
Schoettler, Joanna	Scholten, John	Schopfer, Rebecca	Schreiber, Benjamin	Schroeder, Diane	Schroeder, Val
Schuelke, Douglas	Schule, Linda	Schulman, Milton	Schumacher, John	Schumacher, Margaret	Schumann, Leaf
Schuneman, Nancy	Schureman, Lisa	Schurman, Roger	Schuster, Mike	Schwab, Judith	Schwacke, Theresa
Schwartz, Phebe	Schwede, Bette	Schwinberg, Jean	Schwinger, Francis	Schwinn, Margie	Schwisow, Laurie
Scott, Jack	Scott, Mark	Scott, Nolan	Scott, Nolen	Scott, Patricia	Scott, Raeann
Scovill, Colleen	Scribner, Denee	Seaman, Carol	Seaman, Carol	Seavey, Arthur	Sebek, Mary
Sebring, Mary	Seeburger, John	Segretti, Fiona	Serafini, Robert	Sexton, Hailey	Shackelford, Mary
Shafransky, Paula	Shalackton, Diana	Shandler, Jalien	Sharbono, Melanie	Shaughnessy, Diane	Shaver, Dave
Shaw, Elizabeth	Shaw, Janice	Shaw, Nancy	Shea, Jillian	Shea, Tom	Shearer, Cornelia
Sheats, Melanie	Sheck, Sally	Sheffield, Mary	Sheldon, Diann	Shenk, Harmony	Shenpson, John
Sheridan, Sharon	Sherman--Peterson, Deejah	Sherwin, John	Sherwood, Lydia	Sherwood, Trina	Shikany, Mike
Shikany, Mike	Shikany, Mike	Shiozaki, Sheila	Shively, David	Shively, Kevin	Shoe, Ursula
Shoenbach, Ed	Shouse, Susan	Shreve, Michael	Shubert, Stephen	Shuler, Heidi	Shultz, Linda
Shumway, Bill	Shurgot, Michael	Sigman, Rhonda	Sikes, Lewis	Sikora, John	Silva, Will
Silvas, Clara	Silverman, Goldie	Simcox, Shelley	Simmons, Andrea	Simmons, Chad	Simonsen, Gary

Sin, Iris	Singh, Hansi	Sipher, Amanda	Sipple, William	Sivarajan, Deepa	Skantze, Vanessa
Skerlec, Ernetta	Skindziel, Dawn	Skinner, Will	Skouge, Gloria	Slabaugh, Sandy	Slaby, Sandia
Slater, Lindarose	Slayback, Donna	Slind, Twila	Sloan, Martin	Sloan, Susan	Slocum, Jean
Slosky, Ron	Smead, Christy	Smith, Andrew	Smith, Angela	Smith, Baker	Smith, Byron
Smith, Carol	Smith, Caryn	Smith, Chris	Smith, David	Smith, Dennis	Smith, Diane
Smith, Jacob	Smith, James	Smith, Jeanne	Smith, Jeffrey	Smith, John	Smith, Linda
Smith, Loretta	Smith, Lucia	smith, lucia	Smith, Mike	Smith, Robert	Smith, Sandra
Smolar, Darian	Smotherman, Sara	Snapp, Seth	Snook, Billy	Sobel, Lance	Soffes, Antoinette
Sokal, Izabela	Sola, Susan	Soltess, Robert	Sommer, Haze	Sondik, Sheila	Song, Rebecca Anshell
Sorgen, Jacqueline	Sosin, Madeleine	Sostrich, Eugenia And William	South, Dennis	Sovey, David	Sovola, Shelley
sowards, Patricia	Sparks, Wayne	Spaulding, Melissa	Speer, Cheryl	Speer, Thomas	Speers, Alice And Doug
Spellman, Linda	Spence, Michael	Spindel, Paul	Sprute, Mary	Spurling, Sherry	Spurling, Sherry
St Clair, Susannah	St Germain, Gene	Staley, Alicia	Staley, Evan	Stallings, Martin	Stangeland, Andrew
Stanley, Carol	Stansbery, Karen	Stansell, Katie	Stansfield, Jack	Star, Sam	Stark, Sally
Starr, Christi Lehman	Startin, Maureen	Starzman, Robin	Steele, Elizabeth	Stefano, Lori	Steijn, Alice
Stein, Kathryn	Steinach, Mona	Steinke, Don	Steinke, Don	Stella, Terry	Stephan, Donna
Stephan, Donna	Stepp, Michelle	Stevens, Carol	Stevens, James	Stevens, Julie	Stevens, Summer
Stevenson, Martha	Stewart, Erika	Stewart, Rachel	Stieber, Frank	Stigger, Treva	Stiglich, Lynn
Stiles, Joyce	Stinnett, Kenneth	Stith, Judith	Stlouis, Marsha	Stockton, Suzanne	Stoeckel, Suzanne
Stokes, Daniel	Stone, Jennifer	Stonebraker, Marilyn	Stonecipher, Donna	Stonington, Louise	Stout, Sherry
Strandwold, Tamera	Stratton, Julie	Strickland, Sara	Strong, Laura	Strong--Petersen, Randi	Stroud, Sally
Stuart, Barbara	Stuart, Holly	Stuart, Holly	Stuart, Susan	Stumpf, Melody	Sturgeon, Luke
Stuverude, Neil	Sucher, Marty	Sullivan, Brian	Sullivan, Diane	Sullivan, Theresa	Summa, Pam
Summer, Indigo	Summers, George	Sunde, Laren	Surbert, Brian	Surdi, Len	Surprenant, Delia
Sutherland, Charlotte	Sutherland, Loretta	Sutton, Ellyn	Sutton, Sheila	Swanson, Doug	Swanson, Glenn
Swanson, Susan	Swarbrick, Sandra	Sweet, Kirsten	Sweetin, Ellen	Swenson, Judith	Swenson, Monte
Swent, Cheryl	Swift, Kenneth A	Swindler, Darece	Swoffer, Thomas	Swofford, Holly	Swofford, Holly
Swofford, Holly	Swofford, Holly	Swoope, Karen	Sword, Carol	Sylvester, Zach	Szilagyi, David
Szumlas, Nick	Talbert, Paul	Tan, Shirlee	Tanner, Leah	Taplin, Heather	Tarico, David
Tarpley, Polly	Tascano, N	Tate, Undeen	Tauscheck, Steve	Taylor, Aileen	Taylor, Alanna
Taylor, Csjp, Beth	Taylor, Douglas	Taylor, Jody	Taylor, Julie	Taylor, Kirk	Taylor, Lloyd & Elizabeth
Taylor, Lynn	Taylor, Marlene	Taylor, Rick	Teach, Jean	Tebb, Thomas	Tebb, Tom
Teed, Cornelia	Tempel, Susan	Tenaglia, Brien	Tennis, Ellen	Terry, Judy	Terwilliger, Robert
Testa, Gregory	Teter, Albert	Thaler, Toby	Thiese, Alan	Thomas, Mark	Thompsen, Linda
Thompson, Jerry	Thompson, Kathy	Thompson, Lester	Thompson, Rob	Thompson, Robert	Thompson, Steve
Thompson, Sunny	Thompson, T J	Thomsen, Airdrie	Thomsen, Don	Thomsen, Don	Thomsen, Sheila
Thomson, Jean	Thorne, Eugene	Thornsbury, Jean	Thornton, George	Thornton, George	THORWARD, Minda
Thrush, J	Thuney, Matthew	Thuot, Chuck	Thweatt, Greg	Tilden, John	Tippel, Tammara
Tipton, Gerrie	Titilah, Jennifer	Tobias, Alice	Todd, Carolyn	Todd, Carolyn	Todd, Carolyn
Todd, Carolyn	Todnem, David	Toland, Phoebe	Tolmach, Faye	Tolotti, Christine	Tom, Jacob
Tomazic, Michael	torget, marie	Torget, Marie	Toussaint, Barbara	Townsend, Darlene	Tozzi, Lauren
Tozzi, Lauren	Travis, Teri	Travis, Teri	Treadway, Carolyn & Roy	Treat, Robert	Trescone, Thomas
Trimmell, Tara	Trusty, Jenifer	Tucker, Tobiatha	Tucker--Dolan, Patricia	Tufnell, Alexandra	Tull, Jack P
Tull, Jack P	Turksel, Judy	Turksel, Judy	Turner, Frank	Turner, Michael	Turpin, Joan
Ulrich, Joseph	Underland, Stephanie	Underwood, Dennis	Unger, Wanda	Unwin, Jim	Urias, Victoria
Urquhart, Judy	Uzuner, Selim	Vahsholtz, Joanne	Vail, Cameron	Valencour, Sandy	Valencour, Thomas
Valenti, Frank	Van Cleave, Berinda	Van Cleve, Margie	Van Diest, Renetta	Van Inwegen, Patrick	Van Ness, Mary
Van Petten, Aleeta	Van Zant, Peter & Alix	Vance, John	Vandegrift, Debra	Vandenberg, Nancy	Vandergoore, Timothy
Vandyke, Charlotte	Vane, Floie	Varanitsa, Oleg	Varner, Lisa	Vatne, Sharon	Vaughan, George
Vega, Manuel	Veirs, Scott	Veirs, Val And Leslie	Veler, Fred	Venable, Brian	Vennerholm, Susan
Verbeck, Elizabeth	VERRINDER, JAN	Veterane, Joyce	Viegas, Sheelagh	Vigilante, Patricia	Vignolo, Dominic
Vilgalys, Justas	Villeneuve, Phyllis	Vincent, Karen	Vincent, Renee	Vinciguerra, Kathryn	Vinson, Greg

Vinson, John	Vinson, Kathryn	Vital, Sybille	Vleugels, Dennis	Voget, Connie	Voliva, Steven
Volmut, Mark	Von Bargen, Donna	Von Borstel, Bruce	von Henkelmann, Jenny	Von Tobel, Robert	Voorhees, Tom
Voss, Barbara	Wachholz, Jan	Wade, Bruce	Wade, Bruce	Wagman, Abby	Wagner, Jena
Wagner, Ken	Wagner, Kendra	Wagner, Terry	Wahl, Mark	Wainstein, Leonard	Waldron, Kathleen
Walenta, John	Walker, Annie	Walker, Dorothy	Walker, Dorothy	Walker, Maggie	Wallace, Jon
Wallace, Matt	Wallace, Nadine	Wallesz, David & Barbara	Walseth, David	Walsh, Miranda	Walter, Bernard
Walter, Dixie	Walter, Jonathan	Walters, Bronwen	Wanderer, Ken	Wang, Arthur	Warburton, Kirk
Ward, Gabe	Ward, Jane	Ward, Suzanne	Ware, Molly	Waring, Traci	Waring, Traci
Warner--Rein, Angela	Warren, Emilie	Warren, Emilie	Warren, Emilie	Warrior, Painted Sky	Warter, Dan
Watson, Danny	Watson, Jeffrey	Watt, Don	WATT, MARY	Way, Annette	Way, Janet
Weaver, Judyth	Weaver, Julene	Webb, Dean And Marilyn	Weber, Ellie	Weber, Marty	Weedman, Janet
Weedman, Ruth	Weeks, Ken	Weeks, Wendy	Wehner, Michaela	Weinstein, Diane	Weinstein, Elyette
Weinstock, Jason	Weis, Marguerite	Weis, Marie	Weise, Sherry	Weishaupt, Greg	Weiss, Joseph
Weiss, Marjorie	Weiss, Paul	Weissman, Melissa	Welch, Leanne	Wells, Raymond	Welton, Tiffany
Welty, Leslie	Wenzel, Scott	Wenzl, Barbara	Wershow, Dan	Wesley, James	West, Alice
West, Lisette	West, Russel	West, Rusty	Westberg, Erica	Westland, Christine	Weston, Grace
Westre, Willard	Westre, Willard	Wettengel, Thomas	Weyer, Diane	Wheeler, Jerry	Whitaker, Mark
White, Elizabeth	White, Laura	White, Timothy	Whiteaker, Louis	Whitehurst, Carol	Whitman, Claudette
Whitson, Barbara	Whittle, Andrew	Whitworth, Maria	Whysong, Kelly	Wickwire, Mary	Wiederhold, Joe
Wiederhold, Terry	Wiegand, Beverly	Wieland, Richard	Wilbur, Robert	Wilcox, Gabe	Wilk, Samantha
Wilkie, Susan	Wilks, Andrew	Williams, Alan	Williams, Chris	Williams, Ellen	Williams, Ernie
Williams, Joseph & Diane	Williams, Joseph & Diane	Williams, Joseph & Diane	Williams, Kathleen	Williams, Morris	Williams, Raymond
Williams, Ted	Williamson, Michael	Williamson, Michelle	Willoughby, Emily	Willson, Loren	Wilmore, Thomas
Wilson, Bea	Wilson, Darryl	Wilson, Doris (Jody)	Wilson, Frances	Wilson, Jenny	Wilson, Kirk
Wilson, Patricia	Wilson, Sandra Fuller	Wilson, Sarah	Wilson, Sharon	Wilson, Steve	Wilson, Tom
Windelev, Alis	Wineman, Marian	Wingate, Jim	Winger, Michael	Wingert, Deborah	Winkel, David
Winkel, Marguerite	Winkes, Anne	Winnemuller, Lori	Winnie, Stuart	Winstanley, William	Winterowd, Dal
Witter, Janelle	Witter, Mary	Wohlsen, Adam	Wolf, Robert	Wolf, Torah	Wolfe, Ann
Wolfe, Kathleen	Wood, Darlene	Wood, JD	Wood, MD, Francis	Wood, MD, Francis	Wood, Sandy
Woodall, Linda	Woodbridge, Jennifer	Woolhiser, Karen	Woolley, Nancy	Woolpert, Steven	Wormser, Helen
Worthington, Robert	Wright, Carolyne	Wright, Dale & Pamela	Wright, Dale & Pamela	Wright, Joanne	Wright, Laura
Wright, Morgan	Wright, Olga	Wright, Olga	Wright, Robin	Wrightington, Nancy	Wulf, Virginia
Wungnema, Mia	Yallup, Marlene	Yaplee, Jeffry	Yeager, Elina	Yencich, Joseph A.	Yencich, Joseph A.
Yetter, Jill	York, Dennis	York, Dennis	Young, Loewyn	Young, Mary	Young, Robert
Young, Susan	Youngers, Otto	Yuriar, Dominic	Zaharias, Butch	Zanine, Mike	Zarter, Ellen
Zavareei, Hamid	Zerr, Laura	Zhang, Jiazhu	Ziebell, Kathrine	Zimdars, Barry	Zimmer, Cheryn
Zimmerman, Lloyd	Zontek, Ken	Zovanyi, Louise K	Zubalik, Yvonne	Zuni, Raynell	

FL19 Sierra Club-2

Comment FL19-1

TO: Department of Ecology and City of Hoquiam

RE: Westway and Imperium Oil Shipping Terminal Draft EISs

Dear Ecology and City of Hoquiam:

The recent crude oil train derailments and oil spills across North America underscore the high level of danger that oil transport brings to Northwest communities and waterways. These accidents impact people's lives, homes, schools, jobs, and drinking water, as seen with the deaths of 47 people in Lac-Mégantic, Quebec. Our communities can't afford an oil spill or explosion.

The DEISs for the Westway and Imperium proposals:

1. Find that the risks of oil spills during rail transport, at the terminal site, and during marine vessel transport through Grays Harbor cannot be fully mitigated and if a spill occurred, the environmental damage would be significant.
2. Determine that the projects' increased rail and marine vessel traffic would increase the risk of a derailment, collision, spill, fire, or explosion.
3. Conclude that the projects would cause increased air pollution, increased noise, would have harmful impacts on tribal resources, and increase vehicle delay at railroad crossings long enough to disrupt emergency vehicle response times, and that these impacts cannot be fully mitigated.

Ecology and the City of Hoquiam should use the analysis and findings in the DEISs to reject these oil terminal proposals.

Response to FL19-1

Refer to the Master Response for Purpose and Focus of the EIS.

Table 7-31. Unique Comments Associated with Sierra Club-2 Form Letter

Commenter Name	Comment
Adamson, Conner	Oil should not be transported through our neighborhoods. The transportation of oil is a threat to our health and environment. There are numerous threats that transportation of oil causes!!
Response: Comment acknowledged.	
Ambrose, Jesse	The risks asssociated with coal and oil extraction, shipping, and consumption are simply not worth it. The ocean is on the brink of large scale collapse and carbon emissions are through the roof. The publics safety is not gaurenteed, let alone the safety of critical wildlife habitat. Honor indigenous sovereighnty.
Response: Comment acknowledged.	
Castellanos, Roma	I strongly disagree with oil companies and coal mining companies. I would like to learn more about ways to resist both.
Response: Comment acknowledged.	
Charlotte	We are at a crossroads in human existance. We need to be de-investing in fossil fuels, not expanding their operation, while at the same time investing more into renewable energy. As a Washingtonian, I am proud to be at the forefront of environmental change, and I hope those reading this would agree.
Response: Comment acknowledged.	
Cochrane, Julia	I am from Port Townsend, and am greatly concerned by the risk of increase tanker and barge traffic on all of the Salish Sea & the Olympic Marine Sanctuary.
Response: Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Final EIS Chapter 5 further describes the potential risks associated with rail transport in this area.	
Johnson, Alexandria	I urge the city council of Aberdeen and Department of Ecology to deny permits to both Westway and Imperium. An oil spill in Grays Harbor would devestate the fishing industry, thereby threatening families. I am able to attend college because my father catches fish here. It is vital to give people these opportunities and protect the natrual resources in Grays Harbor.
Response: Comment acknowledged.	
Lawrence, Lynn	Evaluate health risks to children and vulnerable adults. Evaluate impact of combustion of oil and coal upon climate change.

Commenter Name	Comment
Response: Final EIS Chapter 4, Section 4.7, *Impacts on Resources,* has been revised to clarify the full range of human health impacts that could occur as the result of an oil spill, fire, or explosion. Refer to the Master Response for 2.5 Crude Oil Extraction, Transport, and Combustion.	
Lili	The rights of indigenous peoples ought never be violated. Their lives and often non-Indian lives, are dramatically threatened by this violance toward the land we all share. Please, stop the plunder!
Response: Comment acknowledged.	
Lyon, Madison	As a young person living close to these oil train tracks, I am very concerned about the future well-being of my planet. I am opposed to oil and coal and I am opposed to environmental destruction.
Response: Comment acknowledged.	
Moore, Megan	The fact that theres even a debate about this is ridiculous. We need to protect our environment. These companies cant even guarentee a proper clean up and that's a risk that I'm not willing to take.
Response: Comment acknowledged.	
Murray, H. Pat	I would like it documented that I am asking for an Environmental Review of the bank south of Edmonds designated as Olympic Park Reserve prior to expansion of.
Response: Refer to the Master Response for Geographic Scope of the EIS.	
Phillips, Suzanne	The Sarish Sea and all of its environment and a precious natural asset that needs to be preservered for the sustainability of our planet. It only takes one "accident" and millions of people and the environment as a whole will be tragically affected.
Response: Comment acknowledged.	
Poor, Joan	Grays Harbor & will port are essential stopovers on the Pacificy Flyway for shorebirds and for the tourism related dollars of wildlife enthusiasts. Please protect your shoreline from oil spills
Response: See Response to FL1-1.	
Turner-Ramsay, Vanlyn	Oil trains and associated risks and pollutions not only negatively affect our environment due to the devistating effects of fracking, but put many other communities at risk due to potential spills explosions. There is absolutley no reason as to why we are still dependant on this toxic fuel, except for conquest.
Response: Comment acknowledged.	
Van Hollebeke, Dick	The city of Edmonds is unique in its RR tracks cutting off access for safety to our buildings of Berchos. If there is a train running, stopping, or spilling its contents. We also have one of the busiest ferry terminals w/at grade crossing. We need to resolve this unique danger.
Response: Comment acknowledged.	
Van Hollebeke, Maureen	I feel we can do better. We have better technology available today. This is too dangerous for our communities and our planet. No more oil and coal trains!
Response: Comment acknowledged.	
Van Hollebeke, Monda	We must make a firm resolution in our environmentally beautiful Pacific NW, with many tribal sanctuaries and wildlife preserves, to stand against the increase of danger to our health, safety, and the future of sustainable energy in our seacoast areas.
Response: Comment acknowledged.	
Visser, Harmen P.	I am deeply concerned regarding the environmental impacts that may occur to natural areas in and around western Washington. The grace and beauty of Washington is the primary reason my family and I moved here, and we now feel this is threatened.
Response: Comment acknowledged.	
Williams, Tanner W.	Please stop the development of big oil. We must transition to a more sustainable lifestyle. I'm scared that a spill could make irreprable damage to our environment.
Response: Comment acknowledged.	

Table 7-32. Names Associated with Sierra Club-2 Form Letter

Adams, Illegible	Adamson, Conner	Alto, Christopher	Ambrose, Jesse	Andersen, Lucy

Arnold, Frances	Aylesworth, Bonnie	Balinala, Susan	Briggs, Gwyane Fowler	Canfield, Ona U.
Carlson, Joel F	Castellanos, Roma	Chen, George & Alice	Cutting & Mackery, Pat & Thelma	Diaz, Jennifer
Drake, Barb	Foster, Kelsey	Johnson, Alexandria	Johnson, Larry	Johnson, Rebecca
Keefe, George	Lawrence, Lynn	Laylin, Sarah Liberty	Lyon, Madison	Marquart, Lisa
Martinez, lili	Moore, Megan	Murray, H. Pat	Owen, Alice	Phillips, Suzanne
Poor, Joan	Richardson, Sheila	Rizzuto, Marcia	Rolf, Margo	Russell, Richard M
Sobol, Walter	Sohmeissee Eolpar	Stockbridge, Hal	Stormberg, Patrick	Swensen, Johnne
Turner-Ramsay, Vanlyn	Tvedt, Karen	Van Hollebeke, Dick	Van Hollebeke, Maureen	Van Hollebeke, Monda
Walton, Chris	Wilcox, Will and Kay	Williams, Tanner W	Wilson, Bea	

FL20 WCV

Comment FL20-1

Oct 13, 2015

Dept of Ecology & City of Hoquiam

Subject: Westway and Imperium crude oil-by-rail terminal EISs

Dear Dept of Ecolgy & City of Hoquiam,

The findings in the DEISs for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and the environmental damage could be significant.

There is simply too much risk and too little reward from these proposals: Grays Harbor communities would take on the risk and oil companies would reap the profits, while Grays Harbor would become a throughway for oil going elsewhere.

Much of what makes Grays Harbor special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters. The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risk, and traffic delays oil trains would bring to communities along the rail line from Aberdeen to Chehalis and all the way to the source of the oil in North Dakota and beyond.

There are better way to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming. Building more, big infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor. Washington state sould continue to lead on safe, renewable clean energy solutions and say no to more oil and coal. I urge you to do everything in your power to stop these dirty and dangerous projects.
I will also be copying Governor Inslee as this pertains to the future of Washington State.

I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.

Sincerely,

Response to FL20-1

Refer to the Master Response for Purpose and Focus of the EIS.

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport in the extended study area qualitatively. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Table 7-33. Unique Comments Associated with WCV Form Letter

Commenter Name	Comment
Bell, Merriann	Please stand up to the big boys and say no. Ruining any wild and beautiful place for the simple convenience of we humans is completely unacceptable. We do not need to transport and ship oil because we do not need oil. Yes, our "civilization" is set up based on it, but all of you in power MUST begin putting your foot down and changing direction to something cleaner and more sustainable. Discussion of fossil fuels should already be a thing of the past! Please say no to any further development in this direction.
Response: Comment acknowledged.	
Bishop, Martha	Please keep our state safe from dirty oil.
Response: Comment acknowledged.	
Connor, Sheri	Big Oil has a long and sordid history of causing ecological disasters then leaving taxpayers to clean up their mess. Even when they are given paltry fines they use those fines to increase their profits. If you must cave in and allow them to have Westway and Imperium Oil terminal in Grays Harbor then they must carry insurance to cover all damage (ecological, commercial and to individual citizens) they may cause. That would be the responsible thing to do.
Response: Refer to the Master Response for Liability and Responsibility for Incidents.	
Duncan, Brian	We must accelerate the transition to renewable energy, and minimize export of oil and coal. Expansion of import/export facilities for oil and coal would be moving backward, not forward. For both spill prevention, and minimization of global warming and precipitous climate change, we the people of Washington state must find better ways of economic development in Grays Harbor, Anacortes, Bellingham, and other areas than this.
Response: Comment acknowledged.	
Eddy, Mike	Stop cannibalizing Earth and start harvesting all the energy we could ever need from the sun.
Response: Comment acknowledged.	
Engelhardt, Elizabeth	Oil is the catastrophic problem: dangerous and toxic on a local scale and apocalyptic on the global scale. We need to keep it in the ground and turn all our resources to renewable energy.
Response: Comment acknowledged.	
Floyd, Linda	The people of Washington state recognize the imbalance of risk and reward in this proposal and oppose it for all reasons.
Response: Comment acknowledged.	
Hazen, Libby	I urge you to help keep our Sound and our communities safe and honor the treaties with Native People!
Response: Refer to the Master Response for Pupose and Focus of EIS.	
Holcombe, Peter	Now that the House of Representatives has passed legislation permittingcrude oil export we have to stop the runaway destruction of the humanworld. You who are charged with the EIS are trustees of the public assets and you may not diminish those assets nor allow others to diminish them. The largest and most important of the assets is the natural world. It must be allowed to function or the people are doomed. Any proposed activity which threatens the snowpack in the mountains threatens the salmon. So you must carefully weigh what increased carbon emissions will do to the weather, the snow season, and the mountain glaciers.
Response: Refer to the Master Response for Purpose and Focus of the EIS.	

Commenter Name	Comment
Hughes, Laurel	Conclusion? No rolling bombs in Washington State!
Response: Comment acknowledged.	
Lordi, Gail	Please support solar, wind and healthy energy. I know it works and it is better for the State of Washington.
Response: Comment acknowledged.	
Mckole, Lori	Money for oil is not in the benefit of anyone who is thinking not just for today but tomorrow as well. We do not have the money to clean up a spill. And human error is always present. Greed will eventually destroy us. Lets be smart and do things the right way no matter who it offends. It is time to look at the big picture and put nature first.
Response: Comment acknowledged.	
Morabito, Joan	An oil spill in the Pacific waters would devastate marine life and completely dry up the tourism that keeps the City of Ocean Shores alive. The risk is too great to gamble with. We do not need or want crude oil trains or any vessels carrying it on the land or waters. It is "our" back yards that are at risk of being destroyed. Westway and Imperium could care less about the consequences of spill or explosion. For them it would be business as usual. For us that live here it would destroy our way of life forever.
Response: Comment acknowledged.	
Morgan, Nancy	As an educator, parent, citizen and long-time Northwest resident, I am extremely concerned about these developments. I urge you to use irrefutable science and track record information on similar projects to change the course.
Response: Comment acknowledged.	
Norman, Seth	If Washingtonians were fully aware of the hundreds of rail accidents occurring in the last 20 years, this proposal would never have reached your desks. But you are aware, at the Dept. of Ecology, and despite the financial advantages promised, should measure and cut based on the your stewardship to land, water, and people who depend on your protection. Let me help put that in perspective. When a teenager lifted one of the seven-year-old burned in Belllingham's pipeline fire, the younger boy raised a face without lips, and somehow said, "Please don't tell my Mom, because she will be mad and so sad."
Response: Comment acknowledged.	
Pfeiler, Nancy	I am from Oregon. We look to your state for hopeful movements away from the incredible efforts to export fossil fuels. Please continue to do all you can to stop it.
Response: Comment acknowledged.	
Rangel-Guerrero, Mary Anne	Since no mitigation can be fully made for the bad effects of this terminal, it should not be built. I do not live in Gray Harbor but it is in "my back yard', being in Washington and it is a lovely area that should be protected. When I go there again, I do not want to see the destruction that the terminal would bring if built.
Response: Comment acknowledged.	
Rice, Karol	Now is the time to end our reliance on fossil fuels once and for all. The state of Washington has hosted not one, but two World Fairs, one in 1962 in Seattle, dedicated to science, and one in 1974 in Spokane dedicated to the environment. In 1974, warnings were given and predictions of climate changes and their effects were made. Sadly, we weren't ready to listen. Today those predictions and warnings are happening at great cost. We have seen almost half of eastern Washington burn in the past two years with huge wildfires, whose smoke didn't just effect weather and health in the region, but in the western US. We live in a region that not only supports clean, renewable energy, but could increase new job growth, help supplement local farmers, but allow the great state of Washington to again be a leader for the future. Let's take that bold step and pit an end to fossil fuel expansion, and invest in renewable energy, leading the way for our region, our state and our country. Remember the mantra of that World's Fair of 1974, "The Earth does not belong to man, man belongs to the Earth".
Response: Comment acknowledged.	
Steinke, Alona	The DEIS completely ignores Vancouver and the other cities and communities along the rail route. There also should be a separate and cummulative health impact study.

Commenter Name	Comment
Response: Draft EIS Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport—1.25 unit train trips per day on average—in the extended study area qualitatively for the reasons described in the Master Response for the Geographic Scope of the EIS. Final EIS Chapter 5 further describes the potential risks associated with rail transport in this area. The general approach to the risk analysis is to consider potential spill scenarios related to the proposed action. As noted in Draft EIS Chapter 4, *Environmental Health and Safety*, this is because a spill could occur at any location and at any time. Scenarios are based on assumptions about terminal, rail, and vessel operations and locations where spills could occur more frequently, based on expert opinion, or could result in a worst-case spill. Because the potential impacts of an incident would vary based on the material spilled, weather, water flows, location and other factors, Section 4.7, *Impacts on Resources*, describes the types of impacts that could be expected in general terms. This includes revisions to more fully describe potential human health impacts.	
Strang, Arnold	The hook is always jobs, jobs, jobs. The reality is that very few jobs are ever realized. These processes are so automated that very few people are involved in day to day operation. Certainly there will be people required, temporarily, during construction, however, very few will be local people. These are huge contractors that bring their own workers with them. For the more mercenary among us imagine the loss in property value with one of these facilities in your back yard.
Response: Comment acknowledged.	
Stuart, B	As the wife of a volunteer firefighter, I know a lot about the dangers of oil trains. The costs to the community are too high, as is the cost to global health.
Response: Comment acknowledged.	
Swan, Susan	I am counting on your leadership [Governor Inslee].
Response: Comment acknowledged.	
Swedeen, Paula	Please deny the approval of oil-by-rail terminals in Hoquiam.
Response: Comment acknowledged.	
Tenney, Sarah	Hoping you will take appropriate action.
Response: Comment acknowledged.	
Wallrabenstein, James	The climatic changes brought on by global warming are real and pose an existential threat to future generations of planet earth. The continued increasing use of fossil fuels must be curtailed. Coal, natural gas, and oil in the ground should stay there. It is immoral to export these dirty sources of fuel.
Response: Comment acknowledged.	
Wilkinson, Linda	No way does Washington want the risk involved in polluting the Columbia River/oil trains or Grays Harbor/terminal for the sole purpose of Big Oil profits! This is very transparent. Big Oil wins, Washington loses is the name of this game.
Response: Comment acknowledged.	
Wolfe, Barton	Please stop this dangerous and unneccesary project.
Response: Comment acknowledged.	

Table 7-34. Names Associated with WCV Form Letter

Abbott, Ms. G D	Acker, Mr. Mike	Acker, Mr. Mike	Ackerman, Mrs. Shelly	Adair, Mr. Denis	Adams, Mr. James
Adams, Ms. Marsha	Adams, Ms. Traci	Adelson, Dr. Kim	Affleck, Ms. Carol	Agard, Ms. Lisa	Akizuki, Mr. Gary
Alberts, Mrs. Jane	Alberts, Ms. Judith	Albrecht, Mr. Peter	Alexander, Ms. Judith	alexander, Ms. SHIRLEY	Allan, Ms. Inez
Allen, Mr. Dennis	Allen, Mr. James	Allen, Mr. Paul	Allen, Mrs. Susan	Allen, Mrs. Terri	Allyn, Mr. Jim
Alvey, Dr. Richard & mrs Donna	Amadon, Mr. Brian	Amadon, Mr. Brian	Amend, Mr. Tom	Ammann, Dr. Harriet	Ammann, Dr. Harriet
Andersen, Ms. Barb	Anderson Medau, Ms. Jennifer	Anderson, Mr. David	Anderson, Mr. Glen	Anderson, Mr. John	anderson, Mr. todd
Anderson, Mrs. Rosanne	Anderson, Ms. Angela	anderson, Ms. carrie	anderson, Ms. lynnette	Angell, Mrs. Kirsten	angell, Ms. j

Anglin, Mrs. Donna	Anshell Song, Mrs. Rebecca	Armijo, Mr. Francisco	Armitage, Ms. Amelia	Armond, Ms. Christine	Armstrong, Mr. Rep. Seth
Armstrong, Ms. Jude	Arnoldsen, Ms. Barbara	Ashe, Ms. Bobbi	Asher, Mr. Dave	Ashley, Mr. Mark	Aston, Mr. Bill
Aston, Mr. Bill	Aszman, Ms. Jan	Atkins, Ms. Darlene	Atkinson, Mr. John	Atwill, Mr. John	Austerman, Ms. Darla
Avery, Ms. Jean M.	AW, Mr. MALCOLM	AW, Mr. MALCOLM	Awasthi, Mrs. Jordan	b, Ms. kris	B., Mr. Matt
bach, Ms. jhana	Backhaus, Mrs. Cynthia	Backman, Mrs. Lara	Baggerly, Dr. Roy	Bahl, Mrs. Judith	bailey, Ms. annette
Bailey, Ms. Brenda	BAILEY, Ms. DORI	Baker, Dr. Norman	Baker, Mrs. Sonia	Baker, Ms. Judy	Ballew, Ms. LouAnn
Baltin, Mr. Brian	Bamburg, Ms. Paula	Bamburg, Ms. Paula	Banks, Mr. Wesley	Bankson, Mr. Timothy	Bardelson, Mrs. Susanne
Barich, Ms. Cathy	Barnes, Mr. Noel	Barondes, Ms. Lynda	Barrett, Mr. Rick	Barrett, Mrs. Carolyn	Barrett, Ms. Fiona
Barrie, Mr. Donald	Bartlett, Miss Wendy	Bartlett, Mr. Seth	Bartley, Mr. James	Basta, Ms. Angela	Bates, Mr. James
Bayer, Mr. John	Bayer, Mr. John A.	Beaird, Ms. Heather	Beaulieu, Dr. Thomas	Beavin, Mrs. Kathleen	Beavin, Mrs. Kathleen
Beebe, Ms. Dana	Beers, Dr. William	Beissel, Mr. Robert	Bell, Ms. Merriann	Bell, Ms. Sherri	Bellbrook, Mr. Dorje
Bendix, Mrs. Pamela	Bendix, Mrs. Pamela	Bendix, Mrs. Pamela	Benedict, Ms. Marc	Bennett, Mr. Bryan	Bennett, Mr. Ed
bennett, Mr. gary	Bennett, Mrs. Michelle	benoit, Mr. ken	Bereczki, Ms. Pat	Berge, Ms. Ruth	Bergin, Mr. Mary
bergin, Ms. Marypat	Bergquist, Mr. Jim	Beringer, Mr. Mark	Berlin, Dr. Sharon	Bernhardt, Mrs. Leslie	Berntsen, Ms. Karen
Berntsen, Ms. Karen	Betit, Mr. Christopher	Bhakti, Dr. Sara	Bicknell, Ms. Mary	Biggs, Mr. Robert	Bird, Mr. Mike
Bird, Ms. Janet	Birdsell, Dr. Dale	Birge, Mr. Steve	Bishop, Mrs. Martha	Black, Ms. Sylvia	Blair, Ms. Audrey
Blaisdell, Mrs. Jill	Blake, Ms. Eileen	Blake, Ms. Geneva	Blakely, Mr. Patrick	Blanchard, Mr. John	Blue, Mr. Michael
Blumenthal, Mr. Robert	Boatsman, Ms. Carolyn	Bobis, Mrs. Harolynne	Bogie, Mr. Arthur	Boguske, Mr. Matthew	Boguske, Mr. Matthew
Bolanos, Mr. Don	Bonfield, Ms. Barbara	Bonfield, Ms. Barbara	Bonifaci, Mr. Bruce	Bonstein, Mr. Ben	Borba, Ms. Kathleen
Borso, Ms. Pam	Bott, Mrs. Amanda	Bouma, Mrs. Alicia	Bourgea, Ms. Renee	Boutros, Ms. Audrey	Bowdish, Ms. Caroline
bowman, Ms. L	Bradham, Mr. Jonathan	Bradham, Mrs. Judith	Bradley, Mr. Ryan	Bradley, Ms. Cynthia	Bradley, Ms. Kathleen
Brandt, Mr. Robert	Brant, Mr. Daniel	Braunwart, Mr. Tod	Bravender, Mr. David	Brayshaw, Ms. Julia	Brazitis, Mr. Peter
Breckenridge, Ms. Nancy	Bremner, Mr. Bryan	Brennan, Mr. Rory	Briggs, Mr. Tony	Briggs, Mrs. Julia	Britton, Mr. Craig
Britton, Ms. Melissa	Brock, Mrs. Barbara	Brody, Mr. Samu	Brody, Mr. Samu	Bronsema, Mr. Lennon	Brooks, Mr. Gary
Brouillette-Jobe, Ms. Sandra	Brown, Mr. Nate	Brown, Mr. Robert	Brown, Mr. Scott	Brown, Mrs. Kelly	Brown, Ms. Katherine
Brown, Ms. Rebecca	Brown, Ms. Tina	Brown, Ms. Tina	Browne, Ms. Donna	Brueckner, Ms. Barbara	Brummet, Mrs. Carlinea
Brunton, Ms. Beth	Brunton, Ms. Beth	brush, Mr. tom	Brush, Ms. Dana	Bryan, Ms. MK	Bubelis, Mr. Wally
Buch, Mr. Anthony	Buchanan, Mr. Brad	buchanan, Ms. betty	Buckley, Ms. Maureen	Buerkle, Ms. Charla	Bundy, Miss Mary T
Burg, Mr. Max	Burgess, Mr. Corey	Burgess, Mrs. Dorothy	Burgwin, Ms. Barbara	Burk, Mr. Bill	Burke, Mr. Jack
Burke, Mrs. Heather	Burke, Ms. AnnieLaurie	Burnett, Ms. Susan P	Burns, Mr. Tim	Burns, Mr. Tom	Burres, Dr. Kenneth
Burrows, Mr. John	Bush, Ms. Sandra	Bushby, Ms. Faith	Bushur, Ms. Mary	Butcher, Mr. William	Butcher, Mr. William
Butler, Mrs. Dottie	Butler, Mrs. Dottie	Bye, Mrs. Susan	Byrnes, Mr. Coleman	C, Mr. Kristo	Cachola, Mr. Ben
Caldwell-Clark, Ms. Toni	Caldwell-Clark, Ms. Toni	CALKINS, Ms. CYNTHIA	Calkins, Ms. Debra	Campbell, Mr. Earl	canonica, Ms. charlene
Canright, Miss Rebecca	Canton, Dr. Rafael	Capperis, Ms. Paulette	Caraballo, Ms. Patricia	Carey, Mr. William	Carfagno, Miss Michelle
Carpenter, Ms. Dorothy	Carpentier, Ms. Ellen	carr, Dr. chris	Carter, Dr. Thomas	Carter, Mr. Al	Casey, Dr. Margaret
Casey, Ms. Tonnie	Caspers-Curl, Mrs. Karen	Caster, Ms. Cynthia	Caton, Ms. Elizabeth	Caton, Ms. Elizabeth	Cattadoris, Mrs. Kamori
Cawley, Mr. Brian	Chadwell, Ms. Maribeth	Challinor, Ms. Suzanne	Chasse`, Mr. Joe	Chesnut, Ms. Joanna	Chieffo, Mr. Carl
Childs, Ms. Connie Rena	Chimis, Dr. Robert	christ, Ms. m'lou	Chuka, Ms. Paula	Ciske, Mrs. Sandra	Clark, Dr. Kevin
Clark, Ms. Beverly	Clark, Ms. Maxine	Clarke, Mr. Seth	Clay, Mrs. Gretchen	Clifford, Ms. Margaret	Cloud, Ms. Nancy
cochenour, Mr. Eric	cohen, Ms. judith	Colangelo, Ms. Annapoorne	Cole, Dr. Pat	Cole, Ms. Jackie	Cole, Ms. Tracy
Coleman, Ms. Mary	Coleman, Ms. Mary	Colley, Mr. Edward	Collins, Mr. Lyle	Collins, Mr. Lyle	Collins, Mrs. Karen
Collinson, Ms. Katherine	Collmer, Mrs. Sarah	Colson, Ms. Lynn	Comella, Dr. John	Comsia, Mr. Aaron	Conn, Mr. Patrick
Connolly, Ms. Christine	Connor, Dr. Sheri	Connor, Mr. Robert	Conrad, Mr. Philip	Cook, Mr. John	Coontz, Ms. Sharron

Coontz, Ms. Sharron	Corkrum, Mr. Gordon	Cormier, Ms. Mary	Cornell, Mr. Jeff	Cosman, Dr. David	cousins-coleman, Ms. Betsy
cowdrey, Mrs. paula	Cox, Mr. Donald	cox, Mrs. linda	Cox, Ms. lanie	Cox, Ms. Maja	Crago, Mr. William
Crane, Ms. Kimberly	Craven, Mr. Richard	Crawford, Mr. P.E.	Criscuola, Mrs. Debra	Croft, Mrs. Laura	Cronin, Mr. James
Cross, Mr. Henry	Crouter, Mr. Norman	crow, Dr. michelle	Crozier, Mr. Van	Cruver, Mr. Jack	CUIC, Ms. NINA
Culbert, Ms. Laurette	Cummings, Dr. Sue	Cunliffe, Ms. Suzanne	Cunliffe, Ms. Suzanne	curci, Ms. marjorie	Curley, Mrs. June
Curran, Mrs. Barbara	Curry, Mrs. Martha	Curtis, Mr. Hani	Curtis, Mrs. JoAnn	Cwinar, Ms. Julie	Daffles, Mr. Wendell
Dahlgren, PhD, Dr. Mr. Shelley	Dahlgren, PhD, Dr. Mr. Shelley	Dalland, Mr. Inge	Damerell, Mr. Gina	Damerell, Mr. Gina	Damerell, Mr. Gina
Damour, Ms. Kristi	Danielson, Ms. Wendy	Danver, Ms. Sue	Darcy, Mr. Kevin	Darden, Mr. Roger	Darden, Ms. Ruth
D'Avanzo, Mr. Alan	DAvie, Ms. Sarah	Davies, Ms. Charlene	Davis, Mr. Don	davis, Mr. tod	davis, Mr. tod
DAVIS, Ms. ERIKA	Davis, Ms. Florence	Davis, Ms. Virginia	Dawson, Ms. Gail	Dawson, Ms. Susan	Dawson-Barker, Mrs. Joelle
de Balin, Ms. María-Teresa	De Camp, Mrs. Renee	de la Rosa, Mr. Raul	Debolt, Mr. Eric	Debolt, Mr. Eric	Deffenbacher, Dr. Kenneth
DeGeorge, Ms. Rebecca	DeJesus, Ms. Sara	DelGado, Mr. Michael	DelGiudice, Ms. Barbara	Delmonte, Mr. Richard	DeMarsh, Ms. Judith
DeNise, Mr. Max	Denning, Miss Asphodel	Derleth, Ms. Penny	derooy, Ms. beth	DeRooy, Ms. Constance	DeSantis, Dr. Amy
Dettlaff, Dr. Barbara	devinney, Ms. claudia	DeWees, Ms. Kathryn	Di Labio, Ms. G	Di Labio, Ms. Gena	Dick, Mrs. Ethel
Dierks, Mr. Dick	Dignan, Mr. George	DiMaria, Mr. Mark	Dimmitt, Mr. Rafe	Dimmitt, Mrs. Lydia	Dingle, Ms. Jennifer
Dirks, Mr. Gary	Dirks, Ms. Judy	Dixson, Ms. Cynthia	doaneDDS, Dr. Haven	Doney, Ms. Sandra	Donohoe, Mr. Robert
Dotson, Mr. Mike	Downes, Ms. Dorothy	Dowson, Mrs. Eleanor	Doyle, Ms. Patt	Doyle, Ms. Patt	Draper, Mrs. Viki
DuBois, Ms. Julia	Ducharme, Mr. Daryl	Dunbar, Mr. Mark	Duncan, Mr. Brian	Dunn Lee, Mrs. Judith	Dunning, Mr. Kenneth
Duran, Mr. Thomas	Durr, Mr. Greg	Durr, Ms. Rebecca	Dye, Mr. Herb	Easley, Ms. Judah Joy	Easterberg, Ms. Nancy
Edain, Ms. Marianne	Edain, Ms. Marianne	Eddy, Mr. John	eddy, Mr. mike	Edmonds-Rodgers, Ms. Joann	Edwards, Mr. William
Edwards, Mr. Willie	Egan, Ms. Anne	eggers, Mr. k.	Eisen, Ms. Pamela	Ekholm, Mr. Stephen	Elder, Mr. James T
Ellenberger, Mr. Charles	ellis, Mrs. sherry	Ellis-Brock, Ms. Shannon	Ellison, Mrs. Kay	Ellman, Mrs. Deborah	Ellsworth, Ms. Linda
Ely-Morrison, Ms. Lorraine	Engelhardt, Dr. Elizabeth	Engh, Ms. Mary Jane	Engle, Mr. Ray	Engler, Ms. Pam	Engler, Ms. Pam
Enns, Mr. Nels	Erbs, Ms. Lori	Ericson, Miss Hilarie	eschen, Mr. john	Ess, Ms. Margaret	Estep, Ms. Michelle
Etheridge,SMSgt,USAF, Ret., Mr. Richard	Etris, Mr. Caveman	Eul, Ms. Lois	Eul, Ms. Lois	Eul, Ms. Lois	Evans, Mr. Chad
Evans, Mr. Scott	Evans, Mr. Scott	Evans, Ms. Bronwen	evenson, Ms. marilyn	Faber, Ms. Megan	Fahrenwald, Mr. Gill
Fain, Mr. Glenn	Falk, Ms. Diane	Farley, Ms. Cynthia	Farrell, Mr. Bob	Fasnacht, Mrs. Sharon	Fast, Mrs. Wendy
federico, Mrs. kellie	Feiring, Ms. Janet	Felber, Ms. Laurel	Fenker, Mr. John	Fergeson, Ms. Cheryl	FERGUSON, Mr. Brian
Ferkingstad, Mr. Don	Fernando, Dr. Chris	Ferrell, Ms. Alissa	Fetter, Ms. Sharon	Finateri, Mr. Mario	Fink, Mr. Charles
fisher, Mrs. karen	Flannery, Ms. marcia	Fleming, Mrs. Linda	Fletcher, Mrs. Carolyn	Fletcher, Ms. Rebecca	Flieder, Mrs. Dee
Flint, Mr. William W	Floyd, Ms. Linda	FLURY, Ms. LOIS	Foley, Mr. Tom	Fontenot, Mrs. Maryjo	Foran, Mrs. Jane
Ford-Ortiz, Ms. Elizabeth	Ford-Ortiz, Ms. Elizabeth	Fort, Ms. Carolyn	Fosmark, Mrs. Tami	Foster, Mr. Michael	Foutch, Mr. David
Fowler, Ms. ML	Fox, Mr. Larry L	francis, Mr. k.	Francis, Ms. Kathleen	Frank, Mrs. A.	Freels, Mr. Jeff
Freese, Ms. Carol	French, Mr. James	French, Ms. Nina	French, Ms. Tamara	Friedman, Ms. Florence	friedrick, Dr. stephen
Friend Alexander, Ms. Francine	Fritch, Ms. Alyce	Fritz, Mr. Nathan	Froemsdorf, Mrs. Leah	From, Ms. Barbara	Fry, Mrs. Alexis
Fry, Ms. Mandee	Frymire, Mrs. Virginia	Frymoyer, Ms. Allison	Fuller, Mr. George	Fuller, Ms. Deena	furlong, Mr. john
Furness, Ms. Kathleen	g, Mr. g	g, Mr. g	g, Ms. c	g, Ms. k	Gabriel, Dr. Robert
Gadway, Mr. Charles	Gailfus, Ms. Janice	Gale, Ms. Maradel	gales, Dr. Larry	Gallagher, Ms. Patty	Gandolfo, Ms. Deborah
Gang, Mr. Glenn	Gannett, Mr. Mark	Gannon, Ms. Elinor	Garden, Ms. Jenny	Garlett, Ms. Pamela	Garrett, Ms. Lory
Garrison, Mrs. Sabrina	Gartin, Mrs. Courtney	Garvett, Ms. Esther	gaspar, Mr. lawrence	Gaspar, Mrs. Liz	Gaspar, Mrs. Liz
Gates, Dr. Rowena	Gazzoli, Mr. Steve	Gehman, Mr. Frank	Gendvil, Mr. Derek	Gerard, Mr. Joe	Gerber, Miss Jennifer
Gerhard, Ms. Delia	German, Mrs. Monica	Gibbs, Ms. jeanne	Gilbert, Mr. Bill	Gillespie, Dr. Bob	Gillett, Mr. Nick
Gillett, Mr. Nick	Gilroy, Mr. Bryan	Gipe, Mr. Robert	Girling, Mrs. Anna-Lisa	Glaser, Ms. Nancy	Glidden, Ms. Helen
Gmeiner, MD, Dr. Kjersten	Godbee, Ms. Allycia	godzich, Dr. Mika	Goff, Ms. Bobbi	Goffinet, Ms. Rachel	Gold, Mr. Richard
Goldberg, Mr. R. David	Golden, Mr. Jeffrey	Goldsby, Ms. Kim	Gonzales Jr., Mr. Frank	Gonzales-Corbin, Ms. Julie	Good, Ms. Ronda

Goodhope, Ms. Victoria	Goodnight, Ms. Jill	Gordon, Ms. Marianne	Gordon-Maclean, Mr. Andrew	Gortman, Mr. Maxim	Gottlieb, Ms. Olga S.
Graham, Ms. Gianina	Grajczyk, Mrs. Joyce	Grassi, Mr. Richard	Grassl, Mr. Richard	Grassl, Mr. Richard	Gravette, Mrs. Kristina
Greaves, Mrs. Lee Ann	Green, Mrs. Elaine	Green, Mrs. Elaine	Green, Ms. Nicole	greenburg, Mr. stuart	GREENLEE, Mr. ART
Greenlee, Mr. Graham	Greenwald, Dr. Beatrice	Gregg, Mrs. Carolyn	Gregory, Mr. Brian	Gregory, Mr. Steven	griffith, Mr. john
Griswold, Mr. Lyman	Groner, Mr. Matt	Grotzke, Mr. Mark	Gruer, Dr. Linda	Guard, Mrs. Mary	Gudz, Ms. Betsy
Gudz, Ms. Betsy	Guerrero, Mr. Peter	Guffey, Mr. Van	Gump, Mr. Gayland	guram, Dr. monjit	guros, Mr. john
Gutierrez, Mr. Rudy	Guy, Mr. Tim	Guyer, Mr. Alejandro	Guyll, Mrs. Lisa	Gyncild, Ms. Brie	H, Mr. Jens
Habib, Mr. David	Hadlock, Mrs. Amy	Hagan, Mrs. Sena	Hagan, Mrs. Sena	Haggin, Mr. Charles	Hait, Mr. Gordon
Hait, Mr. Gordon	hale, Ms. linda	Haley, Ms. Stacia	Halgren, Mrs. Melba	Hall, Mr. Ronald	Hall, Ms. Heather
Halpern, Mr. David	Hamblin, Mrs. Codi	Hamilton, Ms. Jill	hamlin, Mr. steve	Hammer, Ms. Jennifer	Hance, Ms. Judith
Hand, Mr. David	Hanes, Mrs. Susan	Hanke, Mrs. Susan	Hankins, Mr. David	Hanlin, Mrs. Sue	Hann, Mr. Jason
Hansen, Mr. John	Hanson, Mr. William	Hanson, Mr. William	Hare, Dr. Ed	Harlib, Ms. Amy	Harlow, Ms. Carol
Harp, Ms. Carol Lynn	Harper, Ms. Shirley	Harriman, Dr.	Harris, Mrs. Cathy	harris, Ms. jeri	Harris, Ms. Julie
harrison, Mr. brent	Harrison, Mr. Randy	Harrison, Ms. Deb	Harrison, Ms. Sally	Hartman, Mrs. Nancy	Hartness, Ms. Georgia
Harty, Ms. Florence	Harvey, Ms. Jo	Havens, Ms. Lorena	Haverkamp, Miss Jenny	Hawkins, Mr. David	Hayden, Mrs. Nancy
Hayes, Mr. Chad	Hayes, Mr. Scott	Hays, Mr. James	Hazen, Ms. Libby	heavyrunner, Mrs. mia	Hedgebeth, Mr. Randolph D.
Hedger, Mr. Lloyd	Hedwig Backman, Ms. Karen	Heffler, Mr. Les	Heffler, Mr. Les	heiman, Ms. marilyn	Heller, Ms. Margie
Henderson, Mrs. Ellen	Henderson, Ms. Annette	Henry, Mrs. Mayellen	Hepburn, Ms. Carol	Hernandez, Mr. Richard	Hernandez, Mr. Richard
Heron, Ms. Carrie	Herring, Ms. Lucinda	Hersch, Mr. Steve	Heyneman, Dr. Amy	Heytvelt, Mrs. Marlene	Heytvelt, Mrs. Marlene
Hidalgo, Ms. Cheryll	Higgins, Mr. James	Higgins, Ms. Andrea	Hill, Mr. Henry	Hill, Mr. Michael and Barbara	Hill, Mrs. Cheri
Hilleary, Ms. Patricia	Hinely, Mr. Bill	Hines, Mr. Norman	Hines, Ms. Linda	Hines, Ms. Nancy	Hines, Ms. Nancy
Hinton, Ms. Colleen	Hipp, Mr. James	Hirsch, Ms. Catherine	Hitchcock, Ms. Eliza	Hittler, Mr. William	Hoerler, Mrs. Megan
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Holkup, Ms. Janice	Holland, Mr. Mervin	Holmes, Ms. Katherine	Honaker, Ms. MB	Honcoop, Ms. Kassi	Hood, Ms. Margaret
Hoodwin, Ms. Marcia	Hook, Mr. Patrick	Hoover, Ms. Karen	Houghtaling, Mr. Leonard	Howard, Mrs. Toni	howard, Ms. karen
Howe, Mr. Jared	Hsia, Ms. Ching-Te	Hubbard, Ms. Elizabeth	Huddlestone, Ms. Laura	Hudson, Mr. Mike	Huelsberg, Ms. Carole
Huenke, Ms. A	Hughes, Ms. Laurel	Hughes, Ms. Laurel	Hughes, Ms. Laurel	Hulbert, Ms. Susi	Hulick, Mr. Stephen and Kathleen
Hulick, Mr. Stephen and Kathleen	Hull, Miss Connie	Humphrey, Mrs. Kyra	Hungerford, Mrs. Chasity	Hunt, Ms. Kathleen	Hurst, Mr. Eli
hurst, Ms. Darcia	husby, Mr. jason	Hustad, Mr. Jack	Hutton, Ms. Joan	Hutton, Ms. Joan	Hyde, Mr. Eric
Iluna, Ms. Mana	Iluna, Ms. Mana	Ingram, Mr. Fred	Ingram, Ms. Anna	Irby, Mr. Jim	Ireland, Ms. Jamie
israel, Ms. miriam	Iversen, Mrs. Haifa	Iverson, Mr. Gregory	Jacks, Ms. Antoinette	Jacky, Ms. S.	Jacobs, Ms. Angela
james, Dr. sibyl	James, Ms. L	James, Ms. L	Janusko, Dr. Robert And Donna	Jarrett, Mr. Michael	Jarrett, Ms. Lee Ann
Jarrett, Ms. Lee Ann	Jean, Ms. Gwyn	Jeffrey, Ms. Mary	Jehn, Mr. Robert	Jennings, Ms. Tasceaie	Jensen, Mrs. Judy
Jensen, Ms. christina	Jester, Mr. Harry	Jeter, Mr. Randal	JOEL, Ms. Taryn	JOEL, Ms. Taryn	Johnson, Dr. Burton & Mrs. Doris
Johnson, Dr. Richard	Johnson, Mr. Dale	Johnson, Mr. Dwight	Johnson, Mr. Joel	Johnson, Ms. Colleen	Johnson, Ms. Lorraine D.
Johnston, Mr. Lloyd	Johnston, Ms. Claire	Johnston, Ms. Claire	Jones, Mr. Jeff	Jones, Ms. Cheryl	Jordan, Ms. Catherine
Joseph, Miss Wendy	Joseph, Miss Wendy	Joseph, Miss Wendy	Kaczmarczyk, Mr. Robert	Kade, Ms. Rowen	Kagen, Ms. Davida
Kale, Mr. Alex	Kaltenbach, Mr. John	Kane, Ms. Susan	Karas, Mrs. LIsa	karlson, Mr. fred	Karns, Mr. Larry
Kato, Mr. Josh	Katz, Mrs. Marjorie	Katz, Ms. Nancy	Kaufman, Mr. Adam	Kaylen, Ms. Sharon	Keating, Mr. James
Keating, Ms. Michelle	Keefe, Mr. George	Keefer, Mr. Kelly	Keegan, Mrs. Cheryl	Keeler, Mr. Timothy	Kelly, Ms. Angela
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Kessinger, Mr. Jerry	Kessler, Ms. Harrie	Key, Mr. Christopher	Khatir, Mr. Surena	Khatir, Mr. Surena	Kilgore, Ms. Nancy
Kilgore, Ms. Susan	Kilgore, Ms. Susan	Kilpatrick, Ms. Erin	King, Mr. Kelly	Kingfisher, Mr. Erik	Kingsley, Mr. Christopher

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Klein, Ms. Christine	Kleyn, Ms. Jeanne	Kling, Dr. Ray	Klisuric, Mr. tomdog	Klump, Mr. Ted	Knecht, Ms. Patricia
Knecht, Ms. Patricia	Kneser, Ms. Christine	knight, Ms. Megan	Kocer, Ms. Dianne	Kolakosky, Mrs. Linda	Kolaks, Mrs. Chiou
Kolff, Ms. Helen	Kong, Ms. Diane	Koopman, Mr. William	Korn, Ms. Meryle A.	Korneliussen, Ms. Vivian	kostantino, Mrs. Kalli
Koterba, Mr. Frank	Kovalchik, Mr. Bernard	Krader, Ms. Kate	Kramer, Mrs. Helen	Kreher, Ms. Leslie	kreiner, Mr. dennis
Kriner, Ms. Kristine	Kruger, Mrs. Suzanne	Kruis, Ms. Diana Lynn	Krupp, Mr. Brian	Kuciej, Mr. Walter	Kukowski, Ms. Kathleen
Kuller, Mr. Gideon	Kutzschbach, Ms. Sharon	Kwon, Miss April	L, Mrs. T	Lab, Mr. Michael	Lady, Ms. Sandra
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Lane, Ms. Sandra	Langston, Miss Kimberly	Lantz, Mr. Paul	Lanz, Ms. Jean	Lapp, Ms. Faye	Large, Ms. Jeanne
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Laursen, Mr. Richard	Laurson, Mr. Edward & Gail	Lawrence, Mr. Christopher	Lawrence, Ms. Katherine	lawson, Mrs. esther	lawson, Mrs. Rita
Lazaroff, Ms. Ann	Lazzarini, Mr. Howard	Leavitt, Ms. Donna	Leavitt, Ms. Jane	Lee, Mr. Christopher	Lee, Ms. Kathleen
Leeper, Ms. Kimberly	Leggatt, Ms. Joyce	Lemberg, Mr. Eric	Lenchner, Mr. Nicholas	Lengel, Mr. Dennis	Lenihan, Ms. Colleen
Leptich, Mr. Dave	Lepzelter, Mr. Howard	Lester, Mrs. Anne	LeValley, Mr. Lon	Levengood, Mr. Mark	Levine, Mr. Adam
Lew, Ms. Karen L	Lewis, Dr. Wendy	Lewis, Mr. Brian	Lewis, Mr. Stefan	Lewis, Mrs. Sharon	Lewis, Ms. Joyce
Libby, Ms. Erin	Liddell, Mr. Ryan	liddle, Mr. bill	Lillie, Ms. Kathy	Lincoln, Ms. Deb	Lindberg, Mr. Robert
Lindquist, Ms. Linda K	Ling, Ms. Tracy	Link, Ms. Virgene	Linn, Mr. David	Linn, Mr. David	Linn, Mrs. Lety
Linzmeier, Mr. Robert	Lionz, Ms. Gloria	Lipkin, Ms. Ann	Lipkin, Ms. Ann	Lipsky, Mrs. Dorothy	Little, Mrs. Mallory
Livingston, Mr. John	Lofquist, Mr. Erland	Lofton, Mr. Saab	long, Mr. louie	Long, Mr. Rex W.	Longhom, Ms. Jill
Loper, Ms. Laura	lordi, Mrs. gail	Lorenz, Ms. Ruth	Louchard, Ms. O'Neill	Low, Mr. Sammy	Lowenthal, Mrs. Lorna
Lowney, Ms. Kathleen	Lowry, Miss Elizabeth	Lowry, Ms. Marsha	Luu, Mr. Jayson	Lyman, Mr. Michael	Lyman, Mr. Michael
Lyman, Mrs. Teresa	Lynch, Mr. Peter	Lynn, Ms. Pam	Lytle, Miss Denise	Lytton, Ms. Sabrina	Mabel, Mr. Joseph
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Macy, Mrs. Alicia	Madis, Mr. Eric	Madis, Mr. Eric	Maeda, Ms. Angela	Magana, Ms. Maria	Mager, Ms. Bonnie
maggied, Mr. michael	Magliola, Dr. Lawrence	Mainrender, Ms. Kerrick	Maki, Ms. Linda	Males, Mr. Jerahmeel Reuben	Mamoyac, Mrs. Joy
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marino, Mr. nate	Markley, Ms. Shannon	Marquis, Ms. Valerie	Marshall, Ms. Keela	Martin, Mr. Andrew	Martin, Mr. Arnie
Martin, Mr. Gerry	Martin, Mrs. Morgaine	Martin, Ms. Liza	martin, Ms. melodie	Martinson, Ms. Julie	Marye-Baker, Mrs. Taylor
Mason, Mrs. Judy	Mason, Ms. Maryann	Massey, Ms. Linda	Massey, Ms. Linda	Massie, Mr. David	Masters, Mrs. Mary H.
Mathews, Mr. Lou	Matsui, Ms. Vicky	Mauney, Mr. Ken	Maxfield, Ms. Tania	Maxwell, Mr. Patrick	Maxwell, Mr. Patrick
Maxwell, Ms. Lou Anne	May, Ms. Gyda	Mayer, Mr. David	Mayers, Dr. Marilyn	Mayers, Ms. Victoria	mayner, Mrs. s
mayner, Mrs. s	Mayo-Velasco, Ms. Judy	Maytum, Ms. Constance	Mc Cune, Mrs. Bonnie	McAdams, Ms. Shawnie	McAdams, Ms. Shawnie
McAninch, Dr. Edward	McCann, Mrs. Kathy	McCary, Ms. Kim	McCary, Ms. Kim	McClain, Mr. R S	McClain, Mr. R S
McCluskey, Mrs. Sue	McCluskey, Mrs. Sue	McCollough, Mr. Rayo	McCormick, Mrs. Ida	McCutcheon, Ms. Meghan	Mcdaniel, Mrs. Cheryl
McDonald, Mrs. Judy	McDonald, Mrs. Kim	McDonough, Ms. Rebecca	McDougal, Mr. Austin	McElhiney, Mrs. Becky	McGovern, Mr. John
mcgregor, Ms. denise	McGuffin, Ms. B.	mcguinness, Mr. steve	McGuire, Mr. Henry	McGuire, Mr. Matthew	mcgunagle, Mr. william
McInturff, Mr. David	McKay, Mrs. Amy	McKee, Ms. Barbara	McKenna, Mrs. Lori	McKenney, Mr. Todd	McKenney, Mr. Todd
McKim, Ms. Tina	Mckole, Ms. Lori	McLaughlin, Dr. Gary	McMannis, Mr. Daniel	McMannis, Mr. Daniel	McMannis, Mr. Daniel
McMullen, Mr. Dan	McNeil, Ms. Margaret	Meagher, Mr. Michael	Meekins, Mrs. Jodi	Meijer, Mrs. Kristin	Meinhardt, Ms. Lynnette
Melear, Mr. Erik	Melik, Mrs. Ella	Mello, Ms. Yara	Mellors, Mr. Mitchell	Melton, Mrs. Janet	Mendoza, Mr. Oscar
Mendrola, Dr. Jeannine	Mergler, Mr. Gerald	Mesrobian, Ms. Ann	Methven, Mr. Boone	Meyer, Dr. Edgar	Meyer, Mr. Greg
Meyer, Mr. Kent	Meyer, Mr. Robert	Meyer, Mr. Scott	Meyer, Ms. Carol	Meyer, Ms. Lenore	Meyer, Ms. Margaret

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Millar, Mr. Riff	Millard, Ms. Janet	Miller, Mr. Travis	Miller, Mrs. Diane	Miller, Mrs. Diane	Miller, Mrs. Oralia
Miller, Mrs. Patricia	Miller, Ms. Lynne	Miller, Ms. Mary Ellen	Miller, Ms. Robin	Milligan, Mr. Keith	Mills, Mr. Edward
Millward, Ms. Karen	Milroy, Ms. Marsha	Mink, Mr. Julius	Mitchell, Dr. Craig	Mitchell, Mr. David	Mitchell, Ms. Karen
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moore, Mrs. elizabeth	Moore, Mrs. Janet	Moore, Ms. Angela	Moore, Ms. Janine	Moore, Ms. Kerry	Morabito, Ms. Joan
Morgan, Mr. J. Dean	Morgan, Mr. James	Morgan, Ms. Katherine	Morgan, Ms. Nancy	Morris, Mrs. Elizabeth	Morris, Ms. Eleanor
Morris, Ms. Ellen	Morrison, Mr. Bob	Morse, Ms. Diana	Moser, Ms. Lynn	Moser, Ms. Lynn	Moses, Ms. Nancy
Moskowitz, Mrs. Audrey	Mower, Ms. Amy	MRKVICKA, Mr. EDWARD G.	Mulder, Ms. Linda	Munson, Ms. Kathryn	Murayama, Ms. Joanne
Murphy, Mrs. Margaret	Murphy, Ms. Michaela	murray, Mr. clayton	Murray, Mrs. Susanne	Myers, Mr. Jack	myers, Mrs. blayney
myers, Ms. mercy	Myka, Mr. David	Nagan, Mr. Joe	Nagan, Mr. Joe	Nakano, Ms. Gwen	Nakata, Ms. Kristi
Nakayama, Mr. Garry	Nash, Ms. Lisa	Nastri, Ms. Hope	Neal, Mr. Keith	Neary, Ms. Sally	Nedeff, Ms. Elizabeth
Neevel, Mr. David	Nelson, Dr. Bryan	Nelson, Miss Ingrid	Nelson, Miss Katherine	Nelson, Miss Katherine	Nelson, Ms. Barbara
Nelson, Ms. Jennifer	Neuwald Falcon, Ms. Ruth	Neuwald Falcon, Ms. Ruth	Nickelson, Ms. Andrea	Nicolai, Ms. Jane	Niemi, Mr. Ronald
Niendorf, Mr. John	Nigrath, Ms. Nigeala	Nihem, Ms. Diana	Nishiguchi, Mr. Alan	Norman, Mr. Seth	Norton, Mr. Robert
Nosbaum, Mr. Jeffrey	Notte, Ms. Lynette	Nowack, Mr. James	Nuara, Dr. Michael	Nuess, Mr. Mike	Obert, Mr. Leonard
Oborn, Mr. Roger	O'Brien, Ms. Catherine	O'Connor, Mrs. Kathleen	O'Donald, Mrs. Julie	Oellien, Ms. Sandra	Ofteness, Mr. Tore
Ogle, Ms. Madeline	O'Grady, Ms. Shawn	Ohren, Mr. Sanford	Okubo, Mrs. Heather	Olsen, Dr. Amber	OLSON, Mr. BRYAN
Olson, Mr. Dennis	Olson, Ms. Sandra	O'Neel, Mr. Tom	O'Neill, Mr. mark	Onufer, Mrs. Mary	Oppenhuizen, Ms. Kathy
O'Reilly, Mr. Forrest	Organ, Ms. Ann	Orgel, Ms. Linda	Osborn, Ms. Marsha	Osborne, Dr. Mark	Osborne, Mrs. Esther
Ostrow, Ms. Hillary	Otis, Ms. Anne	O'Toole, Ms. Christina	Ouellette, Dr. Tracy	Owen, Mr. Richard	Padgett, Mr. T
Padgett, Mr. Ted	Padmanabhan, Ms. Urmila	page, Mr. charles	Page, Mr. Nicholas	paget, Mr. peter	paget, Mr. peter
Palasz, Mr. John	Palmer, Mrs. Cheryl	Palmer, Mrs. Judy	Palmquist, Ms. Jennifer	Paolazzi, Ms. Diane	Parkison, Ms. Jerald
Parks, Ms. Carrie	Parr, Ms. Stacy	Parshall, Ms. Sharon	Parsley, Dr. Adina	Parsley, Dr. Patricia	Pasche-Lambert, Ms. Jean
Pate, Mr. david	Pates-Riches, Ms. Nancy	Patrick, Ms. Marlene	Patrie, Dr. Milton	Patterson, Mrs. Julie	Patterson, Ms. Eugenia A.
patterson, Ms. judy	Paul, Ms. K L	Pauley, Ms. Jean	Pauley, Ms. Marcia	Pawtowski, Mrs. Yvonne	Payton, Ms. Fay
Pearson, Ms. Tia	Pederslie, Ms. Sharon	Peha, Mr. David and Julie	Pellett, Mr. Howard	Penchoen, Mr. Gregory	Penchoen, Mr. Gregory
Peniston, Mr. Gary	Penningroth, Mr. Gerald and Jackie	Penry, Ms. Marlene	Perine, Mrs. Susan	Perkins, Mr. Sid	Perret, Mrs. Jennifer
Perry, Mr. Glenn	Perry, Mrs. Janet	Perry, Ms. Jacquie	Perry, Ms. Jane	Persephone, Ms. Bridgid	Person, Mrs. Katie
Peter, Ms. Joan	Peters, Mr. Thom	Petersen, Mr. Norman	Peterson, Mr. Chris	Petrie, Mrs. Lynette	Pettit, Ms. Linda
Pfeiler, Ms. Nancy	Phillips, Mr. Glenn	Phillips, Ms. Amy DyAnne	PHUONG LE, Miss HOANG	Pickard, Ms. Janice	Pierson, Mr. Gary
Piger, Mr. Gilbert	Pilger, Ms. Carrie	pilgram, Ms. maryanne	piper, Ms. janna	pipitone, Mr. jeryze	Pirk, Mr. Stephen
Playter, Ms. Michelle	Plimpton, Ms. Katherine	Ploger, Mr. Jim	Plucinski, Mrs. Wanda	polley, Mr. daniel	Ponta, Mr. David
Poor, Ms. Joan	popoff, Mr. dave	Porrini, Miss karin	Porter, Ms. Pat	Posel, Ms. Ellen	Powell, Mr. Lance
Pratt, Mr. Ted	preston, Dr. jenifer	preston, Dr. jenifer	Price, Mrs. Mara	Priestley, Mr. Eric	Priestley, Mr. Eric
Pritchard, Ms. Suzanne	Proebstel, Mr. David	Provost, Ms. Lin	Purcell, Dr. Jennifer	Putnam, Mrs. Alethea	R, Ms. D
RAHM, Mr. DON	Ramer, Ms. Kristina	Ramon, Mrs. Laura	Ramos, Mr. Miguel	Rangel, Mary Anne	Rangel-Guerrero, Mrs. Mary Anne
Ranhofer, Ms. Dolores	Rasmussen, Ms. Nancy	rauch, Ms. Joyce	Raven, Ms. Kerrye	Raymond, Mr. Bob	Rea, Mr. Dennis
Read, Mr. Donald	Read, Mr. Donald	read, Ms. helen	Reading, Ms. T	Reasons, Mrs. Jo	Redick, Ms. Mary
Reich, Dr. Arnold	Reid, Mr. Brian	Reidy, Mr. Thomas	Reiter, Mrs. Margaret	Remington, Ms. Margaret	Remington, Ms. Margaret

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Richman, Ms. Dorë	Richter, Ms. Karen	Riddle, Ms. Carolyn	Riek, Mr. Bob	Ring, Mrs. Susan	Riordan, Ms. Janet
Ripper, Ms. Barbara	Rise, Ms. Diane	Risser, Mrs. Susan & Mr. Peter	Rivera, Mr. Ed	Rivera, Mr. Robert	Robbins, Mrs. Teresa & Keith Brown
Roberts, Mr. James	Roberts, Ms. Jo	Roberts-Gassler, Dr. Vicki	Roehm, Mr. Dave	ROFF OPHEIM, Mrs. KIM	Rogers Decker, Mrs. Vivian
Rohr, Ms. Pamela	Rohrer, Mr. Chuck	Rokas, Mr. John	ROLSKY, Mr. BOB	Romito, Mr. Rick	Rose, Ms. Diane
Roseen-Czaplicki, Mrs. Jill	Rosen, Mr. Michael	Rosenkotter, Ms. Barbara	Rosenkotter, Ms. Barbara	rosenthal, Mrs. elizabeth	Ross, Mr. Keith
Ross, Ms. Catherine	Ross, Ms. E	Roth, Dr. Gregory	Roth, Ms. Arlene	Rothenberg, Dr. Florie	Rowe, Mrs. Alice
Rowland, Mrs. Donna	Roy, Mr. Joseph	Rudolph, Mrs. Joyce	Rudolph, Ms. Geralyne	Ruggiero, Ms. Emma	Rumiantseva, Ms. Elena
Rumiantseva, Ms. Elena	Rummerfield, Mr. Mike	Runkle, Ms. Linda	Rupert, Dr. Frank	Russ, Mr. Dale	Russo, Mr. Jay
Rust, Dr. Richard	Rzepecki, Ms. Ashley	Saarinen, Ms. Tamara	Sahm, Ms. Teri	Salter, Ms. Sarah	Salvati, Ms. Cheryl
Sampson, Ms. Linda Fay	Sanders, Mr. Ralph	Sandvig, Mr. Daniel	Sano, Mr. David T	Saunders, Ms. Sharon	Saupp, Mrs. Janet
Scaief, Mrs. Margaret	Scally, Ms. Jessie	Scalzo, Ms. Miranda	Scauzillo, Mrs. Suzzanne	Scauzillo, Mrs. Suzzanne	Scavezze, Mrs. Barb
sceeles, Ms. vicki	Schaefer, Mr. Jim	Schaeffer, Mr. Barry	Scherer, Ms. Taen	schier, Ms. anna	Schindler, Mr. Bill
Schmeisser, Mr. Frank	Schmidt, Ms. Cheryl	Schneider, Mr. Dan	Schneider, Mr. Matt	Schreibe, Ms. Anne	Schultz, Mr. Gary
Schurr, Mr. J. Michael	schuster, Mr. mike	Schutt, Mr. Mike	Schutt, Mr. Paul	Schwab, Mrs. Judith	Schwartz, Mr. Ira
Schwartz, Mrs. Ronlyn	Schwede, Ms. Bette Ann	Schwinge, Mr. Scott	Schwisow, Ms. Laurie	Schwisow, Ms. Laurie	Scilluffo, Mr. Joe
Scilluffo, Mr. Joe	Scilluffo, Mr. Joe	Scollon, Dr. Suzanne	scott, Mr. gordon	scott, Mr. john	Scott, Mr. Mark
Scott, Mr. Steven	Scott, Mrs. Raeann	Scott, Ms. Alyssa	Scott, Ms. Patricia	Scott, Ms. Susanne	Scribner, Ms. Denee
Seaman, Mr. Robert	Seki, Dr. Janet	Seltzer, Ms. Elizabeth	Sendler, Ms. Nancy	Sercombe, Ms. Sarah	Sextro, Ms. Ann
Shafransky, Ms. Paula	Shardo, Dr. Judith	Shaughnessy, Ms. Diane	Shaw, Mr. George	Shaw, Ms. Nancy	SHEA, Mr. JAMES
SHEA, Ms. JILLIAN	Sheaffer, Mr. Chuck	Shearer, Ms. Cornelia	Sheffield, Ms. Mary	Sherman, Ms. Sarah	Shilling, Mr. Bruce
Shippen, Ms. Sallie	Shore, Mrs. Patricia	shreffler, Ms. Alexandria	Shreve, Mr. Michael	shubert, Mr. stephen	Shuler, Ms. Heidi
Sibelman, Mr. Benjamin	Sieck, Ms. Joanne	Sigel, Ms. Liz	silvesan-valdes, Ms. nancy	Simcox, Ms. Shelley	Simmonds, Ms. Beatrice
Simmons, Ms. Crinn	Simpson, Mrs. Jill	simpson, Ms. penny	Singer, Dr. Donald	Singh Cundy, Dr. Don	Siniscal, Ms. Joyce
Skaar, Mr. Al	Skantze, Ms. Vanessa	Skartvedt, Mr. Noah	Skinner, Ms. Susan	Skinner, Ms. Susan	Slaby, Ms. Sandia
sledge, Mr. scott	Sloan, Ms. Hallie	Smith, Mr. Baker	Smith, Mr. Dance	Smith, Mr. Dennis	Smith, Mr. Greg
Smith, Mr. James	Smith, Mr. Michael	smith, Mr. richard	Smith, Mrs. Sandra	Smith, Ms. Angela	Smith, Ms. Angela
Smith, Ms. Angela	Smith, Ms. Candyce	Smith, Ms. Diane	SMITH, Ms. IRENE	Snapp, Mr. Seth	Snider, Mrs. Ronda
Snook, Mr. Richard	Soares, Mr. James	Sobel, Mr. Lance	Soffes, Mrs. Antoinette	Sohneronne, Ms. Jo	Sorenson, Ms. Marion
Southwick, Ms. Christine	spann, Miss christina	Spaulding, Ms. Loretta	Spear, Mrs. Vana	Species, Mr. Scott	Spence, Mr. Michael
Spencer, Mr. Jeremy	Spencer, Mrs. Martha	Spencer, Mrs. Martha	Sperline, Mr. George	Spike, Mrs. Wilma	sprayregen/sperber, Ms. ann/stan
Sprute, Ms. Mary	Staats, Ms. Karen	stabel, Mr. dan	Stafford, Ms. Lee	Staley, Mrs. Sheri	Stallings, Mr. RJ
Stalman, Dr. Sara	Stansfield, Mr. Jack	Stapp-Brigham, Mr. Sally & Dick	Startin, MACS, CZMT Certified, Mrs. Maureen	Stavis, Mr. Alex	Steen, Ms. Karen
Steichen, Mr. Luke	Steijn, Mrs. Alice	Steinke, Mrs. Alona	Stepp, Miss Michelle	Stevens, Mr. Bradley	Stevens, Mr. Gary
Stevenson, Mrs. Janet	stiffler, Ms. tonya	stiffler, Ms. tonya	Stiglich, Ms. Lynn	Still, Ms. Amber	Stober, Mr. Ty
Stocks, Mr. Lawrence	Stockton, Mr. Richard	Stoeckel, Mrs. Sue	Stoklosa, Mr. Greg	Stokrocki, Ms. Carol	Stoltenberg, Mr. John and Martha
Stoltenberg, Mr. John and Martha	Stoneback, Ms. Sharon	STONER, Mr. TOM	Stoudt, Mr. Matt & Michele	Strang, Mr. Arnold	Strang, Mr. Arnold
Stratton, Mrs. Angela	Stratton, Mrs. Angela	Strichartz, Mr. James	Strickland, Ms. Sara	Strickwerda, Mr. Chris	Stuart, Dr. B
Stucki, Ms. Elizabeth	Sturgeon, Mr. Luke	Sullivan, Ms. Diane	Summers, Mr. George	summers, Ms. aleeta	Sundquist, Mr. Stephen
Sutherland, Mrs. Charlotte	sutton, Mrs. sheila	Swan, Miss Susan	Swanson, Mr. Tim	Swedeen, Dr. Paula	Swensen, Mrs. Mara

Swoffer, Mr. Thomas	Swofford, Ms. Holly	Symonds, Ms. Michael	Synadinos, Mrs. Nicole	Szot, Dr. Patricia	Szumlas, Mr. Nick
Szumlas, Mr. Nick	Szumlas, Mr. Nick	Takush, Miss Kathie E	Tallman, Mr. Scott	Tambellini, Ms. Mindi	tamura, Mr. ernest
Tan, Dr. Shirlee	Tandoo, Mr. James	Tangi, Miss Anna	Tangi, Miss Anna	Tapfer, Mr. Christopher	Tarpley, Mrs. Polly
Tate, Ms. Susan	Tavener, Mrs. Jean	Taylor, Mr. Kirk	Taylor, Mr. Kirk	Taylor, Mrs. Elizabeth	Taylor, Ms. Julie
Taylor, Ms. Nancy	Teed, Mrs. Cornelia	Tegenfeldt, Dr. Ed and Margaret	Tempest, Ms. Lynne	Tenney, Ms. Sarah	Teschner, Mrs. Teresa
Teter, Mr. Albert	Thomas, Mr. Mark	Thomas, Ms. Elissa	Thomas, Ms. Kathleen	Thompsen, Ms. Linda	Thompson, Mr. Don
Thompson, Mr. Dwayne	Thompson, Mr. Gerald	Thompson, Mr. Rob	Thompson, Mr. Shawn	Thompson, Mr. Steve	Thomsen, Mr. Don
Thorne, Mr. Eugene	Thornsbury, Mrs. Jean	Tillman, Ms. Heather	Titus, Mrs. Jennifer	Tobias, Mrs. Alice	Tochterman, Mr. Eric
Tomazic, Mr. Mike	Tooley, Mrs. Ruth	Torrey, Mrs. Norma	Towner, Ms. Erline	Townsend, Ms. Barbara	Townsend, Ms. Wendy
Travers, Ms. Mary	Trevitts, Mrs. Sheila	Tringali, Mr. Al	Triplett, Ms. Janet	Troyer, Mr. Grant	Tsh, Mr. Frank
Tucker, Ms. Laura	Tufft, Ms. Margaret	Tuggle-Hake, Mrs. Vanessa	Turck, Dr. Nancy	Turck, Dr. Nancy	Turnbull, Ms. Edie
Turner, Ms. Diane	Udovich, Mr. Adam	Ulmer, Mrs. Opal	Underland, Ms. Stephanie	Underwood, Mr. Dennis	unger, Ms. wanda
Urias, Ms. Victoria	v., Mrs. linda	Valenti, Mr. Frank	Van Alyne, Mrs. Emily	van Bergen, Ms. Saskia	van doorninck, Mr. Wolter & Anneka
van Helvoort, Mrs. Heather	Van Horn, Mr. Thomas	van Ry, Dr. Meredith	Van Vorous, Mrs. Heather	Van Zant, Mr. Peter	Van zant, Mr. Peter
vanalstine, Ms. peyton	VanEnkevort, Mrs. Shari	Varanitsa, Mr. Oleg	Vaughan, Mr. Russell	Veiby, Ms. Gail	Veirs, Dr. Scott
Veith, Dr. Joachim	Vergillo, Mr. Anthony	VERRINDER, Ms. JAN	VEZIAN, Mr. Marc	Villanueva, Ms. Alana	Vincent, Mrs. Mary
Vincent, Ms. Renee	Vital, Ms. Sybille	Vlachopoulou, Ms. Maria	von Abele, Ms. Melitta	von Borstel, Mr. Bruce	von Borstel, Mrs. Carol
Von hoffman, Mr. Ronald	Voorhees, Mr. Tom	Vose, Mrs. Anngele	W, Dr. C	Wagner, Ms. Christina	Wagner, Ms. Susan
Walaters, Ms. Lynne	Walberg, Ms. Jeriene	Waldron, Ms. Kathleen	walker, Mr. hank	Walker, Mr. John	Walker, Mr. Mark
Walker, Mrs. Carol	Walker, Ms. Laura	Wallace, Ms. LIZ	Wallrabenstein, Mr. James M	Walseth, Mr. David	Walter, Mr. Jonathan
Walter, Ms. Rhoda	walters, Mrs. Donna	Ward, Mr. Gabe	Ward, Ms. Diane	Warden, Ms. Patricia	Washington, Mr. Martin
Washington, Ms. Chris	Watchie, Ms. Joanne	Waters, Ms. Kathleen	Watson, Mr. Jeffrey	Watson, Ms. Donna	Way, Ms. Jessamyn
weaver, Dr. judyth	Weaver, Ms. Julene	Webb, Dr. Dean	Webb, Dr. Dean	Weber, Ms. Cinda	Wechsler, Ms. Susan
Weczorek, Mrs. Katherine	Weczorek, Mrs. Katherine	Weed, Ms. Ardeth L.	Weedston, Ms. Lindsey	Wefers, Dr. Ilse	Weick, Mr. Mark
Weinstein, Ms. Diane	Weir, Ms. Joyce	Weis, Mrs. Marie	Weisel, Mrs. Jan	weissberg, Mr. eric	Wells, Ms. Deanna
Wenger, Mr. William	Werbner, Ms. Laurie	Werner, Ms. Wendy	Werry, Mr. Richard	Wesley, Ms. Sheryl	West, Mr. Rusty
West, Mrs. Janice	West, Ms. Alice	Westbrook, Mr. Alan	Weyer, Ms. Diane	wheaton, Mr. preston	Wheeler, Ms. Jamielyn
Wheeler, Ms. Kathleen	Whitaker, Mr. Mark	White, Dr. Edward	White, Mr. Tim	White, Mr. Tim	White, Mr. Wayne
White, Ms. Nancy	Whitehead, Mrs. Mary	Whitehurst, Ms. Carol	Whitesavage, Ms. Jean	Whitmore, Ms. Sandra	Whittaker, Dr. Kara
Whittaker, Dr. Kara	wickwire, Mrs. mary	Wiederhold, Mr. Joe	Wiederhold, Mr. Joe	Wight, Ms. Barbara	Wildman, Mr. Ben
Wiley, Dr. Kimberly	Wilhelm, Mr. George	Wilkie, Ms. Susan	Wilkinson, Ms. Linda	Wilks, Mr. Andrew	Williams, Mr. Morris
Williams, Ms. Cheryl	Williamson, Mrs. Michelle	Willoughby, Ms. Emily	Wilmes, Dr. Jeannine	wilson, Mrs. bea	Wilson, Mrs. Sharon
Wilson, Mrs. Susan	Windham, Mr. Dallas	Wingate, Mr. Jim	Winstanley, Mr. William	Witham, Mr. Barry	Witt, Ms. Joan
Witte, Ms. Amanda	Woersching, Mr. Marc	Wojciakowski, Mrs. Chelsa	Woldtvedt, Mr. Stan	Wolfe, Mr. Barton	Wolfe, Ms. Kathleen
wolverton, Mr. corey	Wood, Mrs. Sandy	Wood, Ms. Antonia	Wood, Ms. JD	Wood, Ms. R	Woodard, Ms. Merryl
woods, Mr. michael	Workman, Miss Pam	Worley, Mr. Robert	Wright, Ms. Janet	Wurl, Mr. John	Wynn, Mr. My-Tai
Yanchev, Mr. Georgi	Yarde, Mrs. Kathy	Yatchak, Mr. Christopher	Yencich, Mr. Joseph A.	York, Ms. Joan	Young, Mr. Frank
Young, Mr. Glen	Young, Mr. William	Yuldasheva, Ms. Barno	Zerr, Ms. Laura	ZHANG, Mr. JIAZHU	Zuanich, Mrs. Janet

FL21 WEC

Comment FL21-1

Dept of Ecology & City of Hoquiam

Dear Dept of Ecolgy & City of Hoquiam,

The findings in the DEISs for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings cannot be fully mitigated and the environmental damage could be significant.

There is simply too much risk and too little reward from these proposals: Grays Harbor communities would take on the risk and oil companies would reap the profits, while Grays Harbor would become a throughway for oil going elsewhere.

Much of what makes Grays Harbor special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters.

The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risk, and traffic delays oil trains would bring to communities along the rail line from Aberdeen to Chehalis and all the way to the source of the oil in North Dakota and beyond.

There are better way to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming. Building more, big infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor. Washington state sould continue to lead on safe, renewable clean energy solutions and say no to more oil and coal. I urge you to do everything in your power to stop these dirty and dangerous projects.

I will also be copying Governor Inslee as this pertains to the future of Washington State.

I support protection of Grays Harbor and its people and urge you to reject the proposed Westway and Imperium oil terminals.

Response to FL21-1

Refer to the Master Response for Purpose and Focus of the EIS.

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport in the extended study area qualitatively. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Table 7-35. Unique Comments Associated with WEC Form Letter

Commenter Name	Comment
a., nando	the ignorance of men is the enemy of mama nature. why is it that the most educated people commit the worst crimes against nature and humanity? men has turn earth into a painful place for all living

Commenter Name	Comment
	beings...when you do wrong nothing goes unpunished Stop the war against the environment by men I blame you for being cruel
Response: Comment acknowledged.	
Bellinger, Michael	We have to protect our coasts and waters at all costs. It's too great a risk.
Response: Comment acknowledged.	
Bereczki, Pat	Oil spills are an accident waiting to happen.
Response: Comment acknowledged.	
Black, Curt	We know the closer we are to the coast, the larger the ground accellerations will be from a subduction zone earthquake. Hoquiam is in the cross hairs of this event. Locating oil terminals here is just asking for the oiling of the extensive estuary around Hoquiam. I've greatly enjoyed visiting the area for the annual shorebird festival. Toxic petroleum slowly decaying in the extensive mudflats of the area would be a terible outcome. It is not worth loosing these valuable resources just to prolong the death of fossil fuels. We have no business digging up and transferring carbon from the earth to the atmosphere. We have no business taking our irreplacable fossil fuel bridge and shipping to offshore. It is insanity. Wrong fuel cycle, wrong location, wrong target for our irreplacable fuel. Just plain wrong. There must me a less seismically vunerable location in the event we choose to foolishly send our oil to other nations. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, and spectacular coastal waters teeming with shorebirds and aquatic life. This location is far too likely to be destroyed in the earthquake we know is overdue for our region.
Response: Comment acknowledged.	
Bremner, Bryan	My personal concern is primarily for the rail crossings and other problems in Eastern Washington where my children and grandchildren live. This oil is just too dangerous to travel anywhere without significant investments in safety infrastructure which must be made by any potential shippers as the State has no budget for these improvements.
Response: Comment acknowledged.	
Bubelis, Wally	It's time for us as citizens of this state, nation, and world, to use cleaner energy sources than oil. Our weather is already changing, and oil only makes it worse.
Response: Comment acknowledged.	
Burden, Lys	Grays Harbor communities would suffer impacts while oil companies would reap profits. Grays Harbor would become a thoroughfare for outbound oil. Grays Harbor is a special place that would be put at risk. A single oil spill could devastate the maritime economy, productive fisheries, tribal cultures and economies and spectacular coastal waters. The safety record of oil trains has been alarming and foretells an explosive oil train derailment, not if, but when. Equally bad are the air pollution, oil spill risk and traffic delays in all communities along the rail line from Aberdeen to Chehalis (and all the way to North Dakota and beyond). We have better ways to meet energy needs here and abroad. We want to use hydro, solar and wind energy and to respond to climate change. Building for yesterday's energy sources is the wrong path to meet the present and future energy needs.
Response: Comment acknowledged.	
Cole, Cindy	I support protecting Grays Harbor from oil trains. there is the alarming possibility of an oil train explosion.
Response: Comment acknowledged.	
Countryman, John	Furthermore this would do nothing to reduce our dependency on oil or even reduce oil product prices as all the oil on the trains will be shipped overseas. Everyone living within 1/2 mile of the rail line should be scared because of the explosive nature of this oil.
Response: Comment acknowledged.	
Dahlgren, PhD, Shelley	The fossil energy era is nearly over. Oil sales are down in the USA so oil companies what infrastructure to export their dirty product. Once the carbon dioxide is in the atmosphere, it does not matter where it came from, it is still bad for our climate change.
Response: Comment acknowledged.	

Commenter Name	Comment
Davidoff, Janet	I believe Hoquiam and Gray's Harbor will be a big loser here. People like me will also lose because I want to return to Washington to retire Iin Hoquiam. I would rather see Hoquiam become a retirement community which is more compatible with the beauty and wildlife in the area. Thank you for listening.
Response: Comment acknowledged.	
Dering, Gary	It seems extremely obvious and apparent to me and others that any area rich in shellfish and coastal marine life is not in any way a viable option for location of a petroleum handling or processing facility, and CERTAINLY NOT the Grays Harbor county area.
Response: Comment acknowledged.	
Dunlap, Samuel	To get to Grays Harbor the proposal is to haul this dirty oil right past my front door in exploding oil tankers. Before threatening Grays Harbor the beautiful Columbia River lies in harms way.
Response: Comment acknowledged.	
Eggers, K.	It is time to STOP catering to the oil behemoths, and their (our) money! They have had a hold over us for way too long, and newer technologies are now available to supersede their dirty, destructive fuels!!! Thank you for doing the RIGHT thing!
Response: Comment acknowledged.	
Freeman, Dan	It's way past time to turn away from the dirtiest fuels, fuels that are destroying the place we ALL live and the water we ALL drink, and start right now to transition to renewable fuels. Oil and coal and nuclear are not renewable, solar and wind are. We must stop allowing these dirty industries to poison the places where we all live.
Response: Comment acknowledged.	
Hanlon, Linda	Because I do not order a side of tar balls with fresh shellfish while dining at restaurants who purposefully serve safe, sustainable Pacific Northwest seafood. We have a rich shellfish and seafood industry here that has helped shape the state's economy for more than a century. The seafood industry cannot adapt to pollution or heavy industry that will come with an oil terminal anywhere on WA shorelines. I support protection of Grays Harbor, and all WA citizens who love our salmon, whales and seafood.
Response: Comment acknowledged.	
Hanson, Art	We MUST keep climate-changing fossil fuels in the ground!
Response: Comment acknowledged.	
Hanson, Natalie	We MUST keep climate-changing fossil fuels in the ground!
Response: Comment acknowledged.	
Hodgin, Richard	Oil trains in Hoquiam are on the wrong side of history.
Response: Comment acknowledged.	
Holmgren, Susan	My name is Susan R. Holmgren, and I have a B.A. in Business Economics from the University of California at Santa Barbara. Given the rising popularity of renewable energy sources, and decline of finite energy sources, it is a backwards movement economically to embark upon an expansion of oil transport & storage. It is a long-term investment in a project with long-term economic, social, & cultural effects, but which can only offer at most a minimal & very short term gain. In short, the benefit does not measure up to the cost. Social & cultural depletion can be measured economically, in the form of vacant homes, declining property values, increased cost of additional necessary law enforcement, and decrease in community groups which beautify & address concerns in their neighborhoods. Grays Harbor has been prey to drugs, crime, & geographic isolation for decades, and the only way out of this mire is for it to become a tourist destination. And that will never happen as long as our NATIONAL BIRD SANCTUARY ABUTS AN OIL STORAGE FACILITY and ongoing oil transport. This project is the most wrong-headed of any legislative bill I've seen introduced at any level of government in a very, very long time. Why, oh why, are we moving backwards, and against the current everyone else has recognized as the way of progress and safety for future generations? There are better way to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming.

Commenter Name	Comment
Response: Comment acknowledged.	
Jorgensen, Edie	When I lived in Cosmopolis I made good use of the many bodies of water in and around the entire harbor area and would hate to see it damaged by this proposed action.
Response: Comment acknowledged.	
Kilgore, Susan	Washington state and many other areas are being made dumping grounds for the profit of corporations who make money from fossil fuels taken at the high costs of pollution and environmental degradation. Stop these projects and explore renewable energy.
Response: Comment acknowledged.	
Korn, Meryle A.	Considering the history of the coal & oil industry's "profits first" philosophy, they cannot be trusted to consider the negative effects their transportation schemes can and have had on communities they blunder through.
Response: Comment acknowledged.	
Lee, John	As you may know, Grays Harbor is among the most important shorebird habitats on the west coast of North America. ... It is a location of continental importance, and has been so for thousands of years. This natural treasure would be put at risk for the transient benefit of accelerating the profits of the oil industry.
Response: See Response to FL1-1.	
Lewis, Evelyn	I listened to some of the public comment hearings for Westway and I Imperium oil terminal proposals. In particular, I would like to call your attention to the speaker who addressed inaccuracies of plans' risk assessment. In particular the rate in which water flows, and oil would be dispersed in the event of a spill. And there will be spills. There is always corruption and cutting back of safety measures where profits come first. In every disaster from the Deepwater Horizon spill, to GM deaths, to Toyota emissions fraud; one thing is clear. There will be a spill. Polluted water will destroy communities and cover-ups will be revealed.
Response: Refer to the Master Response for Risk Assessment Methods.	
Lynn, Richard	Gray's Harbor would be far too easy to destroy with oil ports there. It's a nearly closed shallow large body of water that would take hundreds of years to heal. There's also very active shell fish and fishing activities there. It's a very definite NO!
Response: Comment acknowledged.	
McClintock, Gloria	Privatizing the gains and socializing the costs of the risks is what the oil companies would be doing.
Response: Comment acknowledged.	
Morgan, Nancy	As a long-time resident of the Pacific Northwest - and a parent, an educator, and voter - I'm extremely dismayed by the possible terminals. While living in other states, I saw firsthand the damages that are detailed below. PLEASE show some spine and do not approve them.
Response: Comment acknowledged.	
Murphy, Cathern	Washington's rail lines have had countless accidents on their rail system, from land slides to accidents with cars, buses and people, Count people have lost their lives in these accidents. There have been many derailments tying up the rail lines for days, plus these system of tracks were installed along not only Puget Sound but countless waterways. Along the water front by Edmond's there is yearly slides as there is across Washington on other tracks. Now picture these events happening to a two mile long oil train that is going through,lets say Mount vernon, and a derailment happens because of a school bus on the tracks in a collision with a vehicle, the train tries to stop but it is to late and a derailment occurs. Spilling oil everywhere that is running into the skagit river and then there is an explosion in the down town area. This is just an example of the many dangers that lays hidden on these tracks. Look at the safety history and now you want to use Greys Harbor as another line, where traffic from logging trucks, tourist and transport choke the roads. But the real danger is the tracks along the the many Rivers and the Ocean. If an accident of a derailment happened here it would devastate the water ways, the Marine life and any other innocent life that happens in the area of the derailment. We know from the history of these lines that it will happen, but where we don't know and will it hit one of the many water ways or a city? will it explode or just send rivers of oil in the water ways or ecosystems? , destroying all life in its path. This unconscionable act of allowing these oil trains to intersect across Washington from the Canadian

Commenter Name	Comment
	border to the Oregon border is asking for a disaster of mega proportions.This hell on wheels is all done so crude oil can be shipped to China, China buys this oil with a clear conscience because death and destruction never happened there with these trains . Oh No! it happened here in Washington State because it doesn't matter to the oil and gas industry because they are a corporation with no conscience and no feelings . But its the people who live in Washington who has to live daily with who will die? what will be destroyed and just how horrific will it be? These trains are a ticking time bomb and I hope our Governor and the transportation dept and the dept of commerce are able to live with the death toll and the blood of innocents on their hands. This will all happen for a handful of dollars. Is that all each ecosystem destroyed and each life taken is worth to you?
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Murtfeldt, Linda	As our Department of Ecology for the State of Washington, it is your mandate to work toward the protection of our environment and our surroundings and all that lives within our boundary. .
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Nalder, Nan	The ecosystem at Grays Harbor would be put at risk. Studies by scientists at the University of Washington confirm that a single major oil spill could devastate the area's maritime economy, productive salmonid and shellfish fisheries, and adversely affect economically important coastal waters. Furthermore, a potential spill would cause economic damage to significant tribal lands and waters and damage cultural properties. The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if.
Response: Comment acknowledged.	
Nichols, Kate	Whoa ! Halt the terminal, save our environment for the future of our children, and grandchildren.
Response: Comment acknowledged.	
Orme, Kevin	We can't export our way to energy independence any more than we can build our way out of gridlock or spend our way to solvency. Please do NOT approve this terminal, all it does is enable oil company fatcats and windfall profits while risking oil spills via both train and at the harbor and our pristing NW environment. Don't be another Galveston, TX!
Response: Comment acknowledged.	
Rudisill, Amanda Sue	Recent history has shown that the concept of safe oil transportation is a myth. Once oil is spilled it never seems to go away. The environment never again is the same, in spite of the money and effort spent on cleaning up the mess. It is only a matter of time before another oil disaster occurs. The safest place for oil is that it remain where it was created, in its underground tomb.
Response: Comment acknowledged.	
Shearer, Cornelia	Grays Harbor communities would take on the risk and oil companies would reap the profits, while Grays Harbor would become a throughway for oil going. There still is no effort being made by the oil companies to research and develop effective means to clean up after themselves. This is a critical need and responsibility for being able to even think about all the transporting that is being done.
Response: Comment acknowledged.	
Shurgot, PhD, Michael	I would also ask you to remember that this oil comes from very dirty mining operations, and the trains wold cross native American land that is considered sacred. We must move toward clean energy futures, and denying this oil terminal would be a major step in that direction. Thank you, for our children and grand-children.
Response: Comment acknowledged.	
Simone, Dorethea	The horrible SMELL is a signal to STOP this. Registered Nurses want better before and after air quality studies. Asthma is epidemic in children and FISH are already too contaminated for CHILDREN or Pregnent women to eat!!! These harms to us must be included. Back to fish.....being poisoned: We must protect Grays Harbor and its people and Nurses urge you to reject the proposed terminal
Response: Comment acknowledged.	
Snow, Donna	I grew up in Hoquiam and value the natural areas that make it so very special. It is too much to risk for oil spills that would forever destroy this very special place.
Response: Comment acknowledged.	

Commenter Name	Comment
Soares, James	YET IT WOULD SOUND THAT BOTH EPA AND HOQUIAM ARE WILLING TO ALLOW THIS IF "THE PRICE IS RIGHT".
Response: Refer to the Master Response for Purpose and Focus of the EIS.	
Spence, Michael	At a time when we should be doing whatever we can to get off our addiction to fossil fuels, the extractive industries want to push us in the entirely wrong direction for the sake of their bottom lines. We need to tell them NO--we won't let you stomp the gas in your attempt to drive us all off the cliff.
Response: Comment acknowledged.	
Stanford, Mark	The proposed oil terminal projects are just plain wrong in so many ways.
Response: Comment acknowledged.	
Stelling, Meredith	There are better way to meet our energy needs. Washington State MUST move away from fossil fuels and towards clean, renewable sources to meet our energy needs and respond to global warming
Response: Comment acknowledged.	
Travena, John	P.S. I grew up down here in Pacific County so I know what a special place this is. The companies that build these places over promise and under deliver on the number of jobs they create. When something goes wrong - an oil spill or an explosion - they don't take responsibility. Look at the spill in the Gulf and how they've dragged their feet to pay those damages.. What would happen to the fishing industry should something go wrong? And the fishing and tourist industry is about all that Pacific and Grays Harbor Counties have going for them regarding commerce. Furthermore, the energy industry is changing: oil companies are running out of options - in this case of places where they can ship their oil from. If you choose to say No, this is a vote for your children's future. This is less oil that will be shipped to China and burnt there. Think about it.
Response: Refer to the Master Responses for Purpose and Focus of the EIS and Liability and Responsibility for Incidents.	
Troup, Brenda	Bad enough what happened at Lac Meganitique and elsewhere; we need no more of that at all.
Response: Comment acknowledged.	
Vandenberg, Nancy	Please do not approve this project. The risk of oil spills, air pollution, and most dangerous, train accidents, makes this project far more risky than beneficial. Why should our communities take on all of this risk to increase oil company profits? I see no long-term benefit for Washington residents, just a lower quality of life so that a few out-of-state entities can benefit. Please instead focus on clean renewable energy sources that will provide local jobs. That is what will help provide a better future for our communities, our state and our nation.
Response: Comment acknowledged.	
Voss, Barbara	This will affect you and your families. It is ridiculous to allow the destruction of more of the environment for a terminal. No No No! These are not responsible people.
Response: Comment acknowledged.	
Williams, Joseph and Diane	What we have is irreplaceable. Big oil doesn't care. They never have and never will. The Exxon Valdez spill has never been completely cleaned up, and how many years ago was that? Why should Grays Harbor and our Washington coast be sacrificed on the altar of big oil?
Response: Comment acknowledged. Potential impacts of a spill are described in 4.3 *Risk Considerations.*	
Worley, Robert	Hoquiam has a bright future for small businesses if they support eco tourism and the fantastic opportunity they have if Hoquiam says hell no to environmental degradation. Hoquiam has a choice.
Response: Comment acknowledged.	
Wright, Patti	There are better ways to meet our energy needs. Washington State is rapidly moving away from fossil fuels and towards CLEAN, RENEWABLE sources to meet our energy needs and respond to global warming. Building more, big infrastructure for yesterday's energy is the wrong path to meet TODAY'S energy needs and a big economic gamble for Grays Harbor. Thank you.
Response: Comment acknowledged.	

Table 7-36. Names Associated with WEC Form Letter

a., nando	Abbott, G D	Acker, Mike	Ackley, Blaine	Adams, Marsha	Adams, Marty
Adkins, Mabel	Aisling, Sky	Albright, Dan	Albright, Gary	Alderton, Janet	Alexandra, Kathryn
Allen, Dennis	Allen, James	Almskaar, S. P.	Alskog, Laura	Alter, Susan	Alvarez, Cecilia
Amend, Tom	Anderson, David	Anderson, Marie	angell, j	ankli, gene	archer, Patrick
Arena, Meredith	Arkley, Alfred	Armond, Christine	Armstrong (ret.), Rep. Seth	Aszman, Jan	Atmore, Wendy
Austin, Kristin	B, Shary	Bachman, Robert	Bahnsen, patrice	Bailey, Stephen	Ballard, John
Ballew, LouAnn	Baltin, Brian	Barnes, Noel	Barrett, Fiona	Bartolini, Jacob	Bayer, John
Beard, Spencer	Beavin, Kathleen	Beebe, Dana	Beene, Jerry	Bellbrook, Dorje	Bellinger, Michael
Benedict, Marc	Benson, Brian	Bereczki, Pat	Beringer, Mark	Bessler, Mike	Bessler, Mike
Betit, Chris	Bhakti, Sara	Bhakti, Sara	Biale, Cheryl	Bird, Mike	Birdsell, Dale
Black, Curt	black, rachael	Blaisdell, Jill	Blankenship, joyce	Boatsman, Carolyn	Bogie, Arthur
Bolanos, Don	Bonfield, Barbara	Borso, Pam	Boynton, Robin	Bradley, Ryan	Brant, Daniel
Braunwart, Tod	Bremner, Bryan	Bremner, Debbie	Brennan, Rory	Briggs, Julia	Brock, Barbara
Brown, Doug	Brown, Robert	Brown, Scott	Brown, Teresa Robbins & Keith	Brown, Tina	Brunton, Jim
Bryan, Teresa	Bubelis, Wally	Buch, Anthony	Burden, Lys	Burger, C L	Burgess, Sara
Burke, Jack	Bushur, Mary	Bykonen, Joan	Byrnes, c	C, Kristo	Caboose, Michael J.
CALKINS, CYNTHIA	Cameron, Cami	Campbell, Douglas	canonica, charlene	Canright, Rebecca	Canright, Rebecca
Carpenter, Dorothy	Carpenter, Lynn	Carter, Janet	Carter-Sorensen, Cynthia	Casey, Meg	chalupnik, janet
Chapin, Heather	Chichester, Scott	christ, m'lou	Christensen, Steven	Chuka, Paula	Clark, Howard
Clarke, Marcia	Claussen, standley	Clay, Gretchen	coffey, shirley	Cohen, Fritzi	Cole, Cindy
Cole, Tracy	Colley, Edward	Collins, Lyle	Collmer, Sarah	Conlan, Mike	Conniry, Susan
Connor, Robert	Conrad, Clare	Conrad, Norm	cooper, trina	Cottrell, Ricardo	Cottrell, Ricardo
Countryman, John	Covington, Diana	cowan, keith	Cox, Donald	Cox, Kim	Cox, Sandra
Croasdale, Kathlene	Cronin, James	Cross, Henry	Crouter, Norman	Crystal, Lakota	Culbert, Laurette
Culkin, Gabriel	Curry, Joyce	Curtis, JoAnn	Curtright, Shari	Cyr, Jean	Dahlgren, PhD, Mr.Shelley
dalton, timothy	Damour, Kristi	Darst, Dolores	Davidek-Waller, Carol	Davidoff, Janet	Davidson, Heather
Davidson, Nora	Davies, Charlene	Davis, Dorothy Jane	Davis, Gale	Davis, Kelly	Davis, Sherry
Davis, Virginia	Dean, Dezri	DeJesus, Sara	DeNise, Max	Denning, Asphodel	Dering, Gary
Derleth, Penny	derooy, beth	DeSantis, Amy	Devine, Julie	devinney, claudia	DiGiacomo, Ron
Dilg, George	Dimmitt, Rafe	Dobson, Bruce	Dollarhyde, Gina	Dotson, Mike	Douglass, Andronetta
Dowson, Eleanor	Dreier, Ted	Drummond, Jessica	Dunlap, Samuel	Dwinell, Danny	Dyeryabina, Svitlana
Eanes, Trina	Eanes, Trina	Easterberg, Nancy	Eddy, John	Edwards, M.D, David L.	Efron, Deborah
Efron, Deborah	eggers, k.	Egtvedt, Claire and Hilkka	Eiesland, Diane	Elkins, Anne	Ellingham, Nancy
El-Moslimany, Ann	elohim, shemayim	Else, Carol	Ericson, Hilarie	Erling, Bonnieclare	Evans, Alice
Evenson, Marilyn	F, Aisha	Fairfax MD, George	Farrington, David	Fenker, John	FERGUSON, Brian
Fiedler, Ed	Finateri, Mario	Finley, Joel	Firkins, Vicky	Fletcher, Carolyn	Fogarty, Dan
Follett, Thelma	Fouts, Shannon	Frank, Karin	FRANKO, GLENN	Freeman, Dan	French, James
friedrick, stephen	Froemsdorf, Leah	Fry, Alexis	Futterman, Sanja	g, g	g, k
Gacek, David	Gainer, Cj	Garner, Marilyn	Garrison, Sabrina	Garvett, Esther	garvey, lydia
Geraci, Judith	Gerhard, Dan	Giacchino, Lisa	gibbs, jeanne	Gilroy, Bry	Glandon, Greg
Glickman, Michael	Glidden, Hal	Glidden, Helen	Godshalk, Katrina	Goebel, John	Goforth, Michael
Gogic, Laurie	Gold, Richard	Goldberg, Laura	Goodhope, Victoria	gordon, jan	Gordon, John
Gorton, Elizabeth	Gottlieb, Olga S.	Goucher, Janice	Graham, Lynn	GRAY, LEONNA	Green, Elaine
Green, Elaine	Green, Nicole	Green, Nicole	Green, Stephen	griffith, john	Grout, Nancy
Gruen, Deric	Gruver, Kirstin	Guffey, Van	Gupta, Deepika	guros, john	Gustafson, Charles
Guthrie, Rand	Guy, Julianna	Guy, Tim	Hale, Nancy	Hale, Serin	Hall, Heather
hallett, karen	Hamblin, Codi	Hamilton, Donna	Hamilton, Shari	Hanauer, Vicki	Hand, David
Hankins, David	Hanlon, Linda	Hann, Jason	Hannan, Margaret	Hanson, Natalie	Harriman, John F.
Harrington, Diane	Harrison, Cheryl	Harrison, Howard	Harter, Patti	hartman, karen	Harty, Florence
Harvey, Jo	HASHMI, Margaret	Hausauer, Nancy	Hayduke Grenard, Mark	heavyrunner, mia	Heffler, Les

Heifetz, Elliot	hendrix, allan	Hennessey, Patricia	Herbert, Patricia	Hermosillo, Domingo	Hersch, Steve
Hesterberg, Tim	Heyneman, Amy	Higgins, Andrea	Hill, Cheri	Hills, Diane	Hines, Nancy
Hines, Norman	Hipp, James	Hirst, David R.	Hodgin, Richard	Hoehn, Albert and Betty	Hoffman, Marianne
Hofland, John	Hogan, Frances	Hogan, Kare Y	Holmgren, Susan	Hosford, Terry	Howard, Eugene
howard, karen	Howard, Toni	Howe, Jared	Howie, Linda	Hulbert, Susi	hurst, Darcia
husby, jason	Huseby, Brian	Iluna, Mana	Iluna, Mana	Innes, Gwen	Jacobson, Lawrence
Janes, Merle	Janssen, Stina	Jeffers, Lisa	Jeffers, Lisa	Jeffries Johnson, JaneAnne	Jensen, Catherine
Jensen, Louetta	Jeter, Randal	Johnsn, Joel	Johnson, Dwight	Johnson, Lorraine D.	Johnson, Richard
Johnston, Lloyd	Joos, Sandra	Jorgensen, Edie	Kade, Rowen	Kadro, Julia	Kagen, Davida
Karas, Lisa	Kay, Susan	Keegan, William	Keeler, Mary	Keller, JoAnn	Kelly, JoAnne
Kelly, Sandra	Kemper, Kathleen	Kenoyer, Melanie	Kerslake, Bruce	Kessel, Gerald	Kessinger, Jerry
kestell, kathy	Khaled, Gayle	Khaled, Gayle	Kilgore, Susan	King, George	Kiplinger, Susan
Kirkham, Dawn	Klefbeck, Randal	Klein, Alexis	Klein, Christine	Kleyn, Jeanne	Korn, Meryle A.
Koser, Carol	Kriner, Kristine	Krom, Kari	L, Anna	Lagerquist, Melinda	Landman, Charle
Lane, Debra	Lane, Sandra	Larkins-Strawn, Marianne	larson, gary	LaRue, Erik	Laurenzi, Adrian
Lauzon, Charlene	LaVonne, Nadine	LaVonne, Nadine	Lawrence, Katherine	Lawson, Gene	lawson, rita
Lazaroff, Ann	Lazzarini, Howard	LeCompte, Joyce	Lee, Derek	Leeper, Kimberly	Lefevre, Neatha
Lemberg, Eric	lenski, francis	Lenzen, Patricia A	Levey, Joel	Lewis, Evelyn	Lichtenstein, Joan
Lindberg, Robert	lindstrom, kim	Lipman, Deborah	Livingston, John	Lofton, Saab	Looney, William
Lowry, Elizabeth	lucianna, mark	Lundgren, Laura	Lyman, Teresa	Lynn, Richard	Lytle, Denise
M, P	Magliola, Lawrence	Maki, Linda	Mallahan, Joe	Malley, Kathleen	Manetti, Christina
Mannix, Sharon	Marble, Desiree	Marceaux, Danielle	Marceron, Dennis	Marett, Susan	Marie, Lorraine
Mars, Rebecca	Marshall, Carolyn	Marshall, Keela	Marshall, Peter	Marshall, Victoria G.	Marvin, Bill
Massey, Linda	Matera, Stephen	Maxwell, Barry	mayer, melody	Mayers, Marilyn	Maytum, Constance
Mazza, Ronald	Mc Cune, Bonnie	McCallum, Jon Martin	McClintock, Gloria	McClure, Kate	McDonald, Kim
McKee, Barbara	McKelvey III, Troy	McKenney, Todd	McKibben, Craig	McKim, Tina	McKinley, Ellen
McLaughlin, Julia	McWillis, Sharon	Mead, Ruth	Meijer, Kristin	Mellors, Mitchell	Metcalfe, Jane
Meyer, Greg	Miller, Robin	Miller, Sharon	Miller, Travis	Miller-Davis, Charm	Miner, Ralph
Mix, Leslie	mobus, scott	Montague, Dan & Pat	morberg, jan	Morgan, Nancy	Moritz, Dorothy
Mork, Stuart	morrow, steven	Mower, Amy	MUELLER, GREG	Mulcare, James	Mulder, Linda
Murawski, Heather	murphy, cathern	murphy, cathern	Murphy, James	Murphy, Mike	Murtfeldt, Linda
N, Diana	Nalder, Nan	Nearing, Sue	Neary, Sally	Neevel, David	Nichols, Kate
Nicholson, Heather	Nickerson, Donna J.	Niendorf, John	Nihem, Diana	OBrien, William	O'connor, Theresa
odell, brian	Ohanian, Laura M.	Ohren, Daniel	Onsel, Greg	O'Reilly, Forrest	orme, kevin
Ormsby, Laura	Ortiz, Javier	Ostrow, Hillary	O'Toole, Christina	Overton, Marilyn	Overton, Marilyn
Padmanabhan, Urmila	Page, Charles	Palumbo, Julieann	Pantier, Gina	Parker, Michael	Parker, Stan
Parrent, Mark	Parsley, Adina	Patterson, Eugenia A.	Patterson, Jane	Pauley, Jean	Payton, Fay
PEARSON, RAE	pearson, tia	Peha, David and Julie	Penchoen, Greg	Perron, P.	Peter, Joan
Peterson, Brian	Peterson, Kristina	petrie, lynette	Pew, Stephen	Pewzner, Randi	Pierson, Gary
Pinneo, Janet	piper, janna	Ploger, Jim	Poirier, Jeanne	polley, daniel	Ponta, David
Popoff, dave	Potter, Syd	potts, paul	Pratt, Aileen	Pratt, Ted	Prestage, Susan
Price, Mara	Pritchard, Suzanne	Prowell, Judith	Puppione, Greg	Quinn, Jim	Quinn, Jim
Radek, Kent	Ramon, Laura	Randall, Sandra	Rasmussen, Pat	ray, b	Rea, Dennis
Read, Lis	Read, Tammye	rechetnick, james	Redd, Ray	Reed, Lesley	Reinhardt, Kay
Rhoden, James	Rhyne, Jennifer	Ricca, John	Rice, Carrie	Rice, Karol	Rice, Robert
RIEPMA, GLORIA	Rimbos, Peter	Ring, Susan	Ringer, Darby	riordan, ruth	Risser, Mrs. Susan & Mr. Peter
Rivera, Robert	Robinson, Laurel	Rodgers, Sandra	Roehm, Dave	Rogers, James	Rohrer, Bonnie
Romo, Donna	Ropke, Melissa	Rossen, Christine	Roth, Arlene	Rubino, Janet	Rudisill, Amanda Sue
Ruggles, Derya	Rumiantseva, Elena	Rumsey, Shauna	Russell, Catherine	Russo, Jay	Savage, Carolyn
Scally, Jessie	Scauzillo, Suzzanne	Scheer, David	Scherer, Taen	Schlagenhauf, Ralph	Schreibe, Anne
Schroff, Mary	Schutt, Mike	Schutt, Mike	Schwartz, Ronlyn	Schwisow, Laurie	Schwisow, Laurie
Scribner, Denee	Seltzer, Elizabeth	Sextro, Ann	Shackel, Gail	Shackelford, Mary	Shearer, Cornelia
Sheck, Sally	Shimeall, Nancy	Shurgot, PhD, Michael	Sim, Barbara	simic, zoran	Simmons, Andrea
Simone, Dorethea	Siptroth, Michael	Slaby, Sandia	sledge, scott	Smith, Jeff	Smith, Ms Diane

Snow, Darcey	Snow, Donna	Soares, James	Solum, Mary	spear, Vana	Spence, Michael
Spickler, Dawn	Spike, Wilma	Sprague, Jennifer	Spurling, Sherry	Stallings, RJ	Stanford, Mark
Stathatos, Michael	Steenbergen, Jeff	Steenerson, Wendy	Steijn, Alice	Stelling, Meredith	Stepp, Michelle
Stepp, Michelle	Stevens, Carol	Stewart, Leslye	Stoeckel, Sue	Stoltenberg, John and Martha	Stoneback, Sharon
Strahm, Ernst R.	Strichartz, James	stumpf, melody	Sullivan, Diane	Summers, George	Sussman, Linda S
sutton, sheila	Swanson, Doug	Swoffer, Thomas	Synadinos, Nicole	Tan, Shirlee	Tank, Robert
Tarpley, Polly	Tashjian, Randy	Taylor, Elizabeth	Taylor, Mason	Teach, Jean	Tennant, Linda
Teske, John	Thoma, Mary	thomas, kat	Thomas, Lisa	Thomas, Mark	Thompson, Don
Thoms, Robert	thorn, debbie	Titilah, Jennifer	Townsend, Dr. Darlene	Travena, John	Treadway, Lissa
trent, bryan	Troup, Brenda	TRUE, Mary	TRUE, Thomas	Tsh, Frank	Tucker, Laura
Turnoy, David and Geri	Tylor, Ronaye	Underwood, Dennis	Urias, Victoria	Urias, Victoria	Vail, Cameron
Valdez/Gamble, Debra/Alan	Van Alyne, Emily	van Helvoort, Heather	Van Vorous, Heather	Van Wey, Charles	VanAusdle, Terri
Vandenberg, Nancy	VEZIAN, Marc	Vital, Sybille	Vocke, Janice	Voliva, Steve	von Abele, Melitta
Voss, Barbara	WACHTEL, SALLY	Walker, Carol	Wallace, Gail	walsh, jason	Washington, Chris
Watchie, Joanne	Watkins, Erin	Weathers, Mary	weaver, Judyth O.	Weaver, Julene	weber, judith
Wechsler, Susan	Wedlund, Rose	Weed, Ardeth L.	Weedston, Lindsey	Weick, Lynette	Wesley, Sheryl
West, Alice	west, Lisette	Westra, Jennifer	Wettengel, Thomas	Weyer, Ms Diane	Weyer, Ms Diane
White, Edward	White, Nancy	White, Tim	Whitefield, James R.	Wiederhold, Joe	Wiese, Cynthia
Wiley, Kimberly	Wilhite, Barbara	Wilkerson, Joyce	Wilkie, Susan	Williams, Joseph and Diane	Williams, Terrie
Willoughby, Emily	Wineman, Marian	Wingate, Jim	wisboro, judy	Witte, Amanda	Woersching, Marc
Wojciakowski, Chelsa	Wolfe, Barton	Wolfe, Kathleen	Wollheim, Charlotte	Wood, Barbara	Wood, Carolyn
Wood, MD, Francis	Wood, R	Woodard, Merryl	woods, michael	Woolett, L	Worley, Robert
Wright, Patti	Y., Nancy	Yake, Bill	Yencich, Joseph A.	Yetter, Jill	York, Joan

FL22 Unnamed

Comment FL22-1

Dear Washington Department of Ecology and City of Hoquiam: I urge you to protect Grays Harbor, the Columbia River Gorge and its communities by rejecting the proposed Westway and Imperium oil terminals. The findings in the DEISs for Westway and Imperium oil terminal proposals show that the risks of oil spills, train accidents, increased train and oil tanker traffic, ai pollution, noise, harmful impacts on tribal culture and resources, vehicle delay at railroad crossings, and negative impacts on the Columbia River Gorge National Scenic Area cannot be fully mitigated and the environmental damage could be significant. Much of what makes this region special would be put at risk. A single major oil spill could devastate the area's maritime economy, productive fisheries, tribal cultures and economies, spectacular coastal waters, sensitive habitats and protected lands and waters in the Columbia River Gorge. The alarming safety record of oil trains means an explosive oil train derailment is a question of when, not if. Less dramatic but equally concerning is the air pollution, spill risks, and traffic delays oil trains would bring to communities along the rail line from Aberdeen to Chehalis, through the Columbia River Gorge, and all the way to the source of the oil in North Dakota and elsewhere. There are better way to meet our energy demands. Washington State is rapidly moving away from fossil fuels and towards clean, renewable sources to meet our electricity needs and respond to global warming. Building more, large infrastructure for yesterday's energy is the wrong path to meet today's energy needs and a big economic gamble for Grays Harbor. Washington State should continue to lead on safe, renewable, clean energy solutions and say no to more oil and coal. I urge you to do everything in your power to stop these dirty and dangerous projects. Sincerely,

Response to FL22-1

Refer to the Master Response for Purpose and Focus of the EIS.

Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses potential impacts from rail and vessel transport in the extended study area qualitatively. Refer to the Master Response for Risk Assessment Methods for a discussion of the assumptions, data sources, and methods used in the analysis of risks.

Table 7-37. Unique Comments Associated with Unnamed Letter

Commenter Name	Comment
Johnson, Doris	We must keep our waters and shoreline clean and healthy. Oil and gas are not healthy additions to our waters. We cannot have a guarantee that there won't be a spill at some time. We also don't need all the oil trains coming across the country and along our pristine Columbia Gorge.
Response: Comment acknowledged.	
Cunningham, Lynda	While Grays Harbor might seem far from the Columbia Gorge, the potentially explosive Bakken crude-oil trains serviced by these terminals would travel through, and directly threaten, the Columbia River Gorge National Scenic Area. Why are we allowing these dangerous crude oil trains to go even close to such a national treasure as our beautiful Columbia Gorge. Please, let us move forward and out of the old days into cleaner, healthier energy choices. Thank you.
Response: Comment acknowledged.	
Dutton, Robert	A short-line pipeline commencing inland (perhaps near Chehalis) and away from tributaries and wetlands, and terminating at the Port of Grays Harbor would eliminate the traffic tie-up and safety risks of oil trains. The issues of transportation to/from the Port should be separated from that of storage and marine shipping.
Response: Comment acknowledged.	
Shaw, Harry (Mike)	If take the time to do the EIS study of which you are capable, you will come to this conclusion also. Thanks for your efforts and due diligence! Mike Shaw Edmonds, WA
Response: Comment acknowledged.	
Stiglich, Lynn	Dear Consultants, Ecology and City of Hoquiam, Your draft environmental impact statement for the proposed terminals in Grays Harbor is deeply flawed. It ignores or downplays so many credible risks. First, do the math: * How many non-yard miles have oil trains traveled in the past three years? * How many non-yard trains derailments have there been? * Of those non-yard derailments, how many involved a tank car puncture and oil spill? * Of those spills, how many were ignited? * Compute the rate and use it to forecast the likely number of non-yard derailment spills the project is likely to generate. Please address the following concerns in the draft EIS, so that the people of Washington will not see increased exposure todangerous oil tank cars: * How many derailment spills will the terminals generate in 30 years? * How manyof those will result in an explosive incident? * Describe the impacts of an oil train explosion on nearbypeople and properties. * Discuss the impacts of an oil train explosion on all potential communities, criticalhabitats and critical aquifers and maritime commerce on the Columbia River. * Discuss the economicimpacts of an oil train spill on residents. The potential for train accidents and oil spillage is non-trivial.Manpower and equipment will be inadequate to contain a spill or extinguish anexplosion. What is the budgeting process, going forward to provide funds for emergency response training and equipment. How are citizens educated and protected in the event of aderailment, explosion or other action? Are the tribes' rights and wishes being respected? The sad truth is there are no perfectly accident free scenarios. The truecosts are not borne by the oil companies, or the transportation companies and their executives. The economic, health and environmental costs are borne by people, property, animals and the environment.This is unacceptable. Conclusion: The projects proposed by Westway and Imperium will have unavoidableand significant adverse impacts in every county through which oil trains pass. Only logical, rational andethical action: Reject the oil terminal at Grays Harbor.
Response: Draft EIS Chapter 4, *Environmental Health and Safety*, presents the analysis of risk of oil spills, fires, and explosions related to the proposed action. The analysis considers the effectiveness of existing regulations and identifies	

Commenter Name	Comment
	additional mitigation measures that would reduce the likelihood of a spill reaching the environment and the potential impacts of an incident. As noted in Chapter 4, mitigation would not completely eliminate the possibility of an incident. Depending on the location, amount spilled, type of crude oil, and environmental conditions, such as the time of year, water flows, and weather conditions, environmental impacts could be significant. Section 4.7, *Impacts on Resources*, describes the types of impacts that could result from an oil spill, fire, or explosion in general terms. Refer to the Master Response for Geographic Scope of the EIS for an explanation of why Chapter 5, *Extended Rail and Vessel Transport*, addresses the potential for impacts from rail and vessel transport in the extended study area qualitatively. Final EIS Chapter 5 further describes the potential risks associated with rail and vessel transport in this area. Final EIS Chapter 6, *Cumulative Impacts*, reflects additional information about the potential risks under cumulative conditions.

Table 7-38. Names Associated with Unnamed Form Letter

Amon, Jack	Anderson, Barbara	Atkinson, Kim	Bancroft, Lois	Bancroft, Lois	Barmann, Matthew
Bauck, Steve	Birkmeyer, Arthur	Callaway, Phillip	Chapin, Heather	Cunningham, Lynda	Day, James
dickson, michele	Dutton, Robert	Foster, Steve	Gamble, Rev. Richard	Gerould, Stephen	Ghising, Lila
Gieber, People of the Heart, Rev. Jayna	Glidden, Helen	Grobelny, Julie	Harrison, Lois	Heath, Elizabeth	Henderson, Judy
Hill, Heather	Hittler, William	Johnson, Doris Audubon, Mountaineers, Sierra club,	Kruse, Mark	Krygier, Mary	Lief, Charles
MacLeod, Dianna	Matulich, Eric	McMonegal, Mary	McMonegal, Mary	Meacham, Michael	O'Hanley, Kelly Climate Action Coalition - Portland, OR,
Overton, Jim	Patriana, Zarah Earthjustice,	Peterson, Rita	Petrie, Stuart	Pickering, Karen	Pickering, Karen
Pruitt-Hamm, Bruce	Reuter, Kalama	Schumucher, Sandra	Shaw, Harry (Mike)	Smith, Alan	Snyder, Sue
Stiglich, Lynn	Strong, Janet	Thorngate, Brian	van der Horst, Kathryn	Walker, Jane	Warneke, L. F. & Carole
Warren, Eleanor					

FL23 Unnamed

Comment FL23-1

To the consultants writing the Draft EIS for the proposed Westway and Imperium oil terminals in Grays Harbor Dear Consultants, Ecology and City of Hoquiam. The people of the State of Washington have the right to decide which risks they are willing to accept and which they are not, and just because some dangerous projects were permitted, that doesn't mean we should approve of more of them. We urge you to reject the oil terminals proposed in Grays Harbor because they will create the following significant and adverse impacts which cannot be avoided or mitigated and are unacceptable. The tank cars cannot be made crashworthy. Non-yard oil train derailment spills are guaranteed to happen in the extended area several times per decade. An oil spill would have significant and adverse impacts that cannot be prevented or mitigated. At best only 14% of the oil is recovered in a spill. Crude oil contains benzene which cannot be recovered from the water. The oil vapor pressure cannot be lowered enough to prevent ignition. When tank cars are punctured during a derailment, gases rush out and find a spark. Non-yard derailment spills usually lead to fire. Oil train fires are likely to cause burns, deaths, and property damage. Burns, deaths, and property damage are significant adverse impacts that cannot be prevented or mitigated. Until all the tank cars have thermal jackets and high capacity pressure relief valves, tank cars sitting in a pool fire, are likely to explode. Firefighters cannot protect the public in those cases. Oil train explosions will be

impossible to prevent for nearly a decade. Oil trains block traffic. They interfere with commerce, emergency response and school buses. The adverse impacts will be significant. There is no practical way to mitigate for blocked traffic. On some days the oil terminal will stink, particularly if the vapor combustion units fail. The city of South Portland Maine has banned the trans-loading of crude oil into marine vessels for that reason. Hydrogen sulfide first deadens the sense of smell, and then it kills you. It gets trapped in low-lying pockets. False Prosperity. An oil terminal can only begin the slide toward altering the landscape, river, and quality of life here. There will be no other direction once it begins. The construction unions in Texas oil towns have been starved to death. And once they've got their foot in the door, big oil is as happy as any other corporation to break unions. The prosperity we're being offered is a poison pill. This cannot be mitigated or avoided. The proposed oil terminals will lead to a net increase of greenhouse gas emissions. If all the terminals in Washington and Oregon are approved, the net global oil production could increase 496,000 barrels per day. This is additive. This is not simply replacing one oil source for another. The increases must be mitigated. The data was provided by Oil change International which performed a similar study on the KXL pipeline for the EPA. http://www.sightline.org/research_item/tracking-emissions/ Lost property values More than reported in the Economic Impact Analysis Planning model used by ECONorthwest. That model doesn't distinguish between unit oil trains and other types of freight. These adverse impacts are significant and cannot be mitigated or avoided. The Cost of Emergency Preparedness in all rail communities. NTSB says emergency response planning along the rail routes is "practically nonexistent". Spill Cleanup delays. It took decades for the spill to be cleaned up in the town of Skykomish. Buildings had to be moved. The delays were significant and are unlikely to be avoided in the future.

Response to FL23-1

Refer to the Master Response for the Purpose and Focus of the EIS.

Table 7-39. Names Associated with Unnamed Form Letter

Foster, Steve	Gieber, Rev. Jayna	Hill, Heather	Hittler, William	Krygier, Mary	Meacham, Michael
Petrie, Stuart	Pruitt-Hamm, Bruce	Shaw, Harry (Mike)	Snyder, Sue	Upenicks, Roland	Walker, Jane

Chapter 8
Attachments

The following list identifies additional materials (e.g., studies, reports, news clippings, related communications) presented in support of comments. The list is organized by submission number. The complete documents are part of the administrative record.

Commenter Code	Commenter	Attachment
Regional and Local Agencies		
RLA-3	City of Ocean Shores, Crystal Dingler	• City of Ocean Shores. 2015. Resolution #745. November 23.
RLA-11	Skamania County Fire District #4, Timothy Young	• SFCD Bakken Resolution, Signed
Tribes		
T-1	Columbia River Inter-Tribal Fish Commission	• Hall, Brent H. Office of Legal Counsel. Confederated Tribes of the Umatilla Indian Reservation. And R. Joseph Sexton. WSAB. Galanda Broadman. June 5, 2015—letter to Anthony Foxx, U.S. Department of Transportation, and Timothy P. Butters, Pipeline and Hazardous Materials Safety Administration; Docket No. PHMSA 2012-0082 (HM-251), 80 Fed. Reg. 26,644 (May 8, 2015) (Hazardous Materials: Enhanced Tank Car Standards and Operational Controls for High-Hazard Flammable Trains): Appeal to the Secretary. • Penney, Zachary, PhD. Columbia River Inter-Tribal Fish Commission. 2015. *Report on Potential Effects of Crude Oil on Columbia River Fishes.* • Resolution No. [none], City of Portland • Resolution No. M-3821, Vancouver City Council
T-5	Quinault Indian Nation, Fawn R. Sharp	• Sharp, F. R. pers. comm. President. Quinault Indian Nation. May 20, 2015—Letter to Maia Bellon, Director, Washington State Department of Ecology. • U.S. Department of the Army, Corps of Engineers, Northwestern Division. 2014. *Record of Decision, Grays Harbor, Washington, Navigation Improvement Project.* August 29. • Climate Central. 2014. Sea Level Rise and Coastal Flood Risk: Summary for Grays Harbor County, WA. June 9. Available: http://ssrf.climatecentral.org.s3websiteuseast1.amazonaws.com/Buffer2/states/WA/downloads/pdf_reports/County/WA_Grays_Harbor_Countyreport.pdf • Atmospheric CO_2, October 1958 to October 2015 (Graph – no source provided) • Dalrymple, R.A. "Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future." Presentation for The National Academies, June 20, 2012. • Wild Fish Conservancy Northwest. *Lower Chehalis River and Surge Plain Fish Use Assessment.* May. Prepared for the Rose Foundation.

- Superior Court of the State of Washington for King County. 2015. *Offer Affirming Department of Ecology's Denial of Petition for Rule Making.* November 19.
- Geology.com. 2015. Bakken Formation: News, Map, Videos and Information Sources. Available: <http://geology.com/articles/bakken-formation.shtml>. Accessed: November 23, 2015.
- Washington Department of Ecology. 2013. *Grays Harbor Geographic Response Plan.* December. Available: <http://www.ecy.wa.gov/programs/spills/preparedness/GRP/GraysHarbor/GraysHarbor.html>.
- Loring, K. 2014. *Healthy Beaches for People and Fish: Protecting Shorelines from the Impacts of Armoring Today and Rising Seas Tomorrow.* February.
- Huppert, Daniel D., Amber Moore, and Karen Dyson. n.d. "Impacts of Climate Change onthe Coasts of Washington State." Seattle.
- Washington Department of Fish and Wildlife. 2015. "Johns River Wildlife Area Map." June.
- U.S. Fish and Wildlife Service. No Date. *Pacific Flyway.*
- Port of Grays Harbor. 2014. *The 2013 Economic Impact of the Port of Grays Harbor.* October 14. Aberdeen, WA. Prepared by Martin Associates, Lancaster, PA.
- U.S. Climate Resilience Toolkit. 2015. Quinault Indian Nation Plans for Village Relocation. Available: <https://toolkit.climate.gov/taking-action/quinault-indian-nation-plans-village-relocation>. Accessed: November 4, 2015.
- Resource Dimensions. 2015. *Economic Impacts of Crude Oil Transportation on the Quinault Indian Nation and the Local Economy.* April.
- Wild Fish Conservancy Northwest. 2013. *Climate Change in the Chehalis River and Grays Harbor Estuary.* February. Prepared for the Chehalis Basin Habitat Work Group.
- Wild Fish Conservancy Northwest. 2015. *Grays Harbor Estuary Salmonid Conservation and Restoration Plan.* May.
- *Shorebird Population Thresholds Table.* January 2015.
- Surfrider Foundation. n.d. *"Washington Coastal and Ocean Recreation Study."*
- Surfrider Foundation. n.d. *"Non-Conbsumptive Recreation Along the Washington Coast."*
- *The Daily World,* "Flooding, Landslides Hit the Harbors," January 5, 2015.
- The Daily World. 2014. "thedailyworld.com." Workshop offers look at Grays Harbor of the future. April 10. http://thedailyworld.com/news/local/workshop-offers-look-grays-harbor-future.
- U.S. Fish and Wildlife Service. 2013. *Grays Harbor National Wildlife Refuge and Black River Unit of Nisqually National Wildlife Refuge Planning Update.* May.
- U.S. Environmental Protection Agency. 2015. Carbon Dioxide Emissions. Available: <http://www3.epa.gov/climatechange/ghgemissions/gases/co2.html>. Accessed: November 23, 2015.

Commenter Code	Commenter	Attachment
		• NASA. 2015. *Warming Seas and Melting Ice Sheets.* Last updated: August 26. Available: <http://climate.nasa.gov/news/2328/>. Accessed: November 25, 2015. • Washington Department of Natural Resources. n.d. *Chehalis River Surge Plain Natural Area Preserve.* http://www.dnr.wa.gov/chehalis-river-surge-plain-natural-area-preserve • Washington State Department of Ecology. 2014. "Washington Greenhouse Gas Emission Reduction Limits." • Washington State Department of Ecology. 2014. n.d. *Washington's Coast: Hazards-Erosion: Westport.* http://www.ecy.wa.gov/programs/sea/coast/erosion/westport.html. • Washington State Blue Ribbon Panel on Ocean Acidification. 2012. *Ocean Acidification: From Knowledge to Action.* November. Washington Department of Ecology, Olympia, WA. Publication No. 12-01-015. • Washington Department of Ecology. 2010. Appendix A: Addressing Sea Level Rise in Shoreline Master Programs. *SMP Handbook.* July. Publication No. 11-06-010. • Washington Department of Ecology. 2015. Coastal Land Underwater with Sea Level Rising. Available: <http://www.ecy.wa.gov/climatechange/risingsealevel_more.htm>. Accessed: November 25, 2015. • The National Academy of Sciences. 2012. *Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future.* Report in Brief. Washington, DC. • Washington State Department of Natural Resources. 2012. Navagable Waters.
T-8	Quinault Indian Nation, Kristen Boyles (EarthJustice)	• Aas, E., T. Baussant, L. Balk, B. Liewenborg, and O.K. Andersen. 2000. PAH metabolites in bile, cytochrome P4501A and DNA adducts as environmental risk parameters for chronic oil exposure: a laboratory experiment with Atlantic Cod. *Aquatic Toxicology* 51 (2000): 241-258. • Abrams, L. 2013. Fracking chemicals may be making oil more dangerous. Last updated: August 13, 2013. Available: <http://www.salon.com/2013/08/13/fracking_chemicals_may_be_making_oil_more_dangerous/>. Accessed: December 11, 2013. • Armstrong, D. A., C. Rooper, and D. Gunderson. 2003. Estuarine Production of Juvenile Dungeness Crab (*Cancer magister*) and Contribution to the Oregon-Washington Coastal Fishery. *Estuaries* Vol. 26(48): 1174-1188. • Association of American Railroads. 2013. AAR Reports October and Weekly Rail Traffic Gains, 3Q Crude Oil Up Year Over Year. Last updated: November 7, 2013. Available: <https://www.aar.org/newsandevents/Freight-Rail-Traffic/Pages/2013-11-07-railtraffic.aspx>. Accessed: December 11, 2013. • Association of American Railroads. 2013. AAR Reports Record Second Quarter Crude-by-Rail Data; Decreased Weekly Rail Traffic. Last updated: August 29, 2013. Available: <https://www.aar.org/newsandevents/Freight-Rail-

Traffic/Pages/2013-08-29-railtraffic.aspx>. Accessed: December 11, 2013.

- Association of American Railroads. 2013. *Moving Crude Oil by Rail.* December.
- Association of American Railroads. 2015. *U.S. Rail Crude Oil Traffic.* June.
- Bash, J., C. Berman, and S. Bolton. 2001. *Effects of Turbidity and Suspended Solids on Salmonids.* November. Prepared for Washington State Transportation Commission.
- Black, A. 2005. Light induced seabird mortality on vessels operating in the Southern Ocean: incidents and mitigation measures. *Antarctic Science* 17(1): 67-68.
- BP West Coast Products. 2002. *Material Safety Data Sheet—Crude Oil* (MSDS No. RS296). May 13.
- Brenkman, S. J., S.C. Corbett, and E.C. Volk. 2007. Use of Otolith Chemistry and Radiotelemetry to Determine Age-Specific Migratory Patterns of Anadromous Bull Trout in the Hoh River, Washington. Transactions of the American Fisheries Society, 136(1)
- Briggs, K. T., W.B. Tyler, D.B. Lewis, P.R. Kelly, and D.A. Croll. 1983. Brown Pelicans in Central and Northern California. *Journal of Field Ornithology*, Vol. 54 (4): 353-373.
- British Columbia Ministry of Environment. 2015. *West Coast Spill Response Study, Volume 1: Assessment of British Columbia Marine Oil Spill Prevention & Response Regime.* March 28. Prepared by Nuka Research & Planning Group.
- Carnegie Endowment for International Peace. 2015. *Know Your Oil: Creating a Global Oil-Climate Index.*
- CB&I Environmental and Infrastructure, Inc. 2015. *Bakken Crude Oil Spills—Response Options and Environmental Impacts.* June. Prepared for Commonwealth of Massachusetts Department of Environmental Planning.
- City of Hoquiam. 2015a. *Findings of Fact, Conclusions of Law and Recommendation to City Council,* Re: Hoquiam City Council Resolution No. 2015-09, (TA #15-01). August 17.
- City of Hoquiam. 2015b. Amendments to City of Hoquiam Municipal Code, Section 10.03.116 and Section 10.09.030. September 14.
- City of Hoquiam. 2015c. Rescission of City of Hoquiam Moratorium Ordinance. September 14.
- Giles, Cynthia. U.S. Environmental Protection Agency, April 22, 2013—letter to Jose W. Fernandez and Dr. Kerri-Ann Jones, U.S. Department of State, regarding the DSEIS for the Keystone XL Project.
- Grays Harbor County. 2015. *Shoreline Restoration Plan for Shorelines in Grays Harbor County.* June. Prepared by The Watershed Company.
- Hansen, A. J. and R. Defries. 2007. Ecological Mechanisms Linking Protected Areas to Surrounding Lands, *Ecological Applications* Vol. 17(4): 974-988.
- Harris, Kamala D. Attorney General, State of California. October 2, 2014 —letter to Amy E. Million, Community Development Department, City of Benicia, regarding Attorney General's Comments on the Draft Environmental Impact Report for the Valero Benicia Crude-by-Rail Project.

- Heintz, R. A., S.D. Rice, A.C. Wertheimer, R.F. Bradshaw, F.P. Thrower, J.E. Joyce, and J.W. Short. 2000. Delayed effects on growth and marine survival of pink salmon *Oncorhynchus gorbuscha* after exposure to crude oil during embryonic development. *Marine Ecology Progress Series*, Vol. 208: 205-216, December 8.
- Herrmann, T.J. Acting Director, Office of Safety Assurance and Compliance. July29, 2013—letter to Jack Gerard, American Petroleum Institute, regarding review of potential safety issues related to the transportation of crude oil by rail.
- Heugens, E. H. W., A.J Hendriks, T. Dekker, N. van Straalen, and W. Admiraal. 2001. A Review of the Effects of Multiple Stressors on Aquatic Organisms and Analysis of Uncertainty Factors for Use in Risk Assessment, *Critical Reviews in Toxicology*, 31:3, 247-284.
- Ibrahim, A. M. and M. M. A. El-naggar. 2012. Ballast Water Review: Impacts, Treatments and Management, *Middle-East Journal of Scientific Research* 12(7): 976-984.
- Incardona, J. P., et al., 2015. Very low embryonic crude oil exposures cause lasting cardiac defects in salmon and herring. *Scientific* Reports. No. 5, 13499; doi: 10.1038/srep13499. September 8.
- Kennish, Michael J. 1994. Pollution in Estuaries and Coastal Marine Waters. *Journal of Coastal Research* Special Issue No. 12: Coastal Hazards.
- Mantua, N., I. Tohver, and A. Hamlet. 2009. Impacts of Climate Change on Key Aspects of Freshwater Salmon Habitat in Washington State, IN *The Washington Climate Change Impacts Assessment: Evaluating Washington's Future in a Changing Climate*. University of Washington, Seattle, Washington.
- Mastrangelo, G., E. Fadda, and V. Marzia. 1996. Polycyclic Aromatic Hydrocarbons and Cancer in Man. *Environmental Health Perspectives*, Vol. 104(11): 1166-1170.
- Millar, F. 2014. *Comments on the Draft Environmental Impact Report for the Valero Benicia Crude-by-Rail Project.* September 15.
- North Dakota Pipeline Authority. 2015. *Monthly Update: August 2015 Production & Transportation.* October 13.
- Oil Change International. 2013. *Analysis of the Potential Costs of Accidents/Spills Related to Crude by Rail.* November 8. Prepared by the Goodman Group.
- Oliveira, M. B., V.L. Oliveira, and J.A.P. Coutinho. 2009. Thermodynamic Modeling of the Aqueous Solubility of PAHs. *Industrial & Engineering Chemistry Research,* 2009(48): 5530-5536.
- Ort, M. P., S.E. Finger, J.R. Jones. 1995. Toxicity of Crude Oil to the Mayfly, *Hexagenia bilineata* (Ephemeroptera: Ephemeridae). *Environmental Pollution*, Vol. 90,(1): 105-110.
- Ramachandran, S. D. P.V. Hodson, C. W. Khan, and K. Lee. 2004. Oil dispersant increases PAH uptake by fish exposed to crude oil. *Ecotoxicology and Environmental Safety* 59(2004): 300-308.
- Resource Dimensions. 2015. *Resource Dimensions Professional Services Proposal for the Chehalis Basin: A Comparative Economic Valuation of Ecosystem Services and Contribution Changes.* August 21. Prepared for Quinault Indian Nation.
- San Juan County. 2015. *San Juan County Oil Spill Response Capacity Evaluation.* June 30. Prepared by Nuka Research & Planning Group.

- Schneising, O., J.P. Burrows, R.R. Dickerson, M. Buchwitz, M. Reuter, and H. Bovensmann. 2014. Remote sensing of fugitive methane emissions from oil and gas production in North American tight geologic formations, *AGU Publications* . September 4.
- Shorelines Hearings Board for the State of Washington. 2013a. Direct Testimony of James E. Jorgensen, *Quinault Indian Nation, et al. v. City of Hoquiam, et al.,* SHB No. 13-012c consolidated. September 5.
- Shorelines Hearings Board for the State of Washington. 2013b. Testimony of Ervin Joseph Schumacker, *Quinault Indian Nation, et al. v. City of Hoquiam, et al.,* SHB No. 13-012c consolidated. August 29.
- Shorelines Hearings Board for the State of Washington. 2013c. Testimony of Ervin Joseph Wartman, PH.D., *Quinault Indian Nation, et al. v. City of Hoquiam, et al.,* SHB No. 13-012c consolidated. August 29.
- Short, J. W. 2015. *Fate and Effect of Oil Spills from the Trans Mountain Expansion Project in Burrard Inlet and the Fraser River Estuary.* May 26.
- Sieminski, A. 2013. *Statement of Adam Sieminski, Administrator, Energy Information Administration, U.S. Department of Energy, before the Committee on Energy and Natural Resources, U.S. Senate.* July 16, 2013.
- Sightline Institute and Oil Change International. 2015. *Tracking Emissions: The Climate Impact of the Proposed Crude-by-Rail Terminals in the Pacific Northwest.* November.
- Skagit County Hearing Examiner. 2015. Direct Testimony of Dr. Frank James, *In the Matter of the Appeal of Re Sources for Sustainable Communities, et al. v. Equilon Enterprises LLC, et al.,* No. PL14-0396. January 28.
- Skagit County Hearing Examiner. 2015. Testimony of Fred Millar, *In the Matter of the Appeal of Re Sources for Sustainable Communities, et al. v. Equilon Enterprises LLC, et al.* No. PL14-0396 January 21.
- Stinson, D. W. 2015. *Draft Periodic Status Review for the Brown Pelican.* Prepared for Washington Department of Fish and Wildlife, Wildlife Management Program. February.
- *The Globe and Mail,* "How oil is transported from North Dakota's Williston Basin," December 2, 2013.
- U.S. Department of State, Bureau of Oceans and International Environmental and Scientific Affairs. 2014. *Final Supplemental Environmental Impact Statement for the Keystone Xl Project Appendix U, Lifecycle Greenhouse Gas Emissions of Petroleum Products from WCSB Oil Sands Crudes Compared with Reference Crudes.* January.
- U.S. Environmental Protection Agency. 2011. *Hazard Characterization Document, Screening-Level Hazard Characterization, Crude Oil Category, Sponsored Chemical, Crude Oil* (CASRN 8002-05-9). March.
- U.S. Environmental Protection Agency. 2015a. *EJSCREEN ACS Summary Report*. October 26.
- U.S. Environmental Protection Agency. 2015b. *EJSCREEN Blockgroup Data Combined.* October 26.
- U.S. Environmental Protection Agency. 2015c. *EJSCREEN Report for 1 mile Ring Centered at 46.967506,-123.853707, Washington, EPA Regionl 10.* October 26.

Commenter Code	Commenter	Attachment
		• Vinebrooke, R. D., K.L. Cottingham, J. Norberg, M. Scheffer, S.I. Dodson, S.C. Maberly, and U. Sommer. 2004. Impacts of multiple stressors on biodiversity and ecosystem functioning: the role of species cotolerance. *Oikos*, Vol. 104: 451-457. • Washington Department of Ecology. 2013. Chapter 6 – Resources at Risk, *Grays Harbor Geographic Response Plan.* December. Available: <http://www.ecy.wa.gov/programs/spills/preparedness/GRP/GraysHarbor/GraysHarbor.html>. • Washington Department of Ecology. 2015. *Washington State 2014 Marine and Rail Oil Transport Study.* (Pub. No. 15-08-010). March 1. • Washington Department of Health. 2013. *Comments on the Environmental Impact Statement (EIA) for the Proposed Tesoro Savage Vancouver Energy Distribution Terminal Docket #EF-131590.* December 17. • Washington Department of Transportation. 2008. *Washington State: Amtrak Cascades Mid-Range Plan.* December. • Washington Department of Transportation. 2014. *R 520 Pontoon Construction Design-Build Project, Fish Handling Monitoring Report, Cycle 4 Float-Out.* May 16. Prepared by Kiewit-General. • Washington Physicians for Social Responsibility and Oregon Physicians for Social Responsibility. 2015. *Position Statement on Crude Oil Transport and Storage to Governors of Washington and Oregon from Concerned Washington & Oregon Health Care Professionals*. February. • Washington State Transportation Commission. 2006. *Statewide Rail Capacity and System Needs Study.* Final. December. Prepared by Cambridge Systematics with Berk & Associates, Global Insight, HDR, Starboard Alliance Company, and Transit Safety Management. • Waterkeeper Alliance, Riverkeeper, and ForestEthics. 2015. *Deadly Crossing: Neglected Bridges & Exploding Oil Trains.* November. • Western Organization of Resource Councils. 2012. *Heavy Traffic Ahead: Rail Impacts of Powder River Basin Coal to Asia by Way of Pacific Northwest Terminals.* July. • Wild Fish Conservancy Northwest. 2013. *Climate Change in the Chehalis River and Grays Harbor Estuary.* February. Prepared for the Chehalis Basin Habitat Work Group. • Wild Fish Conservancy Northwest. 2013. *Grays Harbor Juvenile Fish Use Assessment: 2012 Annual Report*. February. Prepared for the Chehalis Basin Habitat Work Group.
Organizations		
O-11	Extreme Oil Campaign Director, Matt Krough	• Fox, P. 2014. Report on Bakersfield Crude Terminal Permits to Operate. Bakersfield, CA. • U.S. Environmental Protection Agency. 2015. EJ Screen Demographic Indicators.
O-12	Friends of Grays Harbor, Arthur Grunbaum	• Brooker, H. "Tsunami Impact on Fuel Storage Containers." NEES REU Program, Lehigh University, 2011. • Resource Dimensions. 2015. *Economic Impacts of Crude Oil Transport on the Grays Harbor Economy.* August.

Commenter Code	Commenter	Attachment
O-13	Friends of Grays Harbor, Arthur Grunbaum	• City of Aberdeen. 2015. An Ordinance Adopting a Six Month Moratorium Prohibiting the Licensing, Location, and Permitting of Facilities for the Wholesale Storage and Sales of Liquid, Solid, or Gasified Petroleum in the City of Aberdeen, State of Washington. July 22. • *The Daily World,* "Elma Coucil against oil trains," October 25, 2014. • City of Montesano. 2014. Resolution #904. April 29 to May 21.
O-14	Friends of Grays Harbor, Arthur Grunbaum	• City of Ocean Shores. 2014. A Resolution of the City Council of the City of Ocean Shores, Washington, in Opposition to the Transport, Storage, and Shipping of Crude Oil in and Near the Grays Harbor Estuary. October 27. • City of Hoquiam. 2015. Ordinance No. 2015. • City of Westport. 2014. Resolution #844. July 28.
O-15	Friends of Grays Harbor, Arthur Grunbaum	• Lee, K., M. Boufadel, B. Chen, J. Foght, P. Hodson, S. Swanson, and A. Venosa. 2015. *The Behaviour and Environmental Impacts of Crude Oil Released into Aqueous Environments.* November. Ottawa, ON. Prepared for the Royal Society of Canada.
O-17	Friends of the San Juans, Stephanie Buffum	• Hasselman, J. 2015. The Power to Say "No": SEPA's Substantive Authority and Controversial Fossil Fuel Projects. *Environmental & Land Use Law* Volume 41(2):26–33. • U.S. Coast Guard. 2014. "Risk Assessment of Transporting Canadian Oil Sands.". Report to Congress. May 29.
O-18	Friends of the San Juans, Stephanie Buffum	• Memorandum of Understanding Between the Washington State Department of Ecology and the British Columbia environmental Assessment Office.
O-35	Oregon Physicians for Social Responsibility, Regna Merrit	• WPSR and OPSR Position Statement on Crude Oil Transport and Storage.
O-36	Oregon Physicians for Social Responsibility, Regna Merrit	• OPSR Airborne Particulate Matter and Public Health
O-55	Twin Harbors Fish and Wildlife Advocacy	• *Los Angeles Times,* "Oil Train Crashes," October 7, 2015. • Mobrand and Jones & Stokes Associates. 2005. *All H Analyzer (AHA) User Guide.* Draft. June 7. • Quinault Indian Nation. 2015. "Chehalis River and Grays Harbor Areas 2A-1, 2A, 2D – Week 46 Closure." October 29. • Transportation Safety Board of Canada. 2015. *Railway Investigation R15H0021.* Available: <http://www.tsb.gc.ca/eng/enquetes-investigations/rail/2015/r15h0021/r15h0021.asp>. Accessed: October 18, 2015.

Commenter Code	Commenter	Attachment
O-63	Washington Physicians for Social Responsibility, Laura Skelton	• WPSR and OPSR Position Statement on Crude Oil Transport and Storage. • Washington Physicians for Social Responsibility Policy Position Opposing the Siting of Crude Oil Terminals within Population Centers.
General Public		
GP-2	Abramson, Mary	• Abramson, Mary. Letter to Govenor Inslee and Committee members
GP-98	Brake, William	• U.S. Environmental Protection Agency. 2015. *Greenhouse Gas Equivalencies Calculator*. Accessed November 25. Available: http://www2.epa.gov /sites/production/files/widgets/ghg_ calc/calculator.html
GP-99	Brake, William	• U.S. Environmental Protection Agency. The Energy Potential of Various NorthWest Energy Projects at Grays Harbor. Excel spreadsheet.
GP-110	Brown, Keith and Teresa Robbins	• Skamania County Fire District No. 4, Resolution No. 215-03, Bakken Oil Resolution
GP-243	Ford, Robert	• *The Daily World,* "After latest slide, is the bluff safe?," March 5, 2015.
GP-273	Gordon, Diana	• Harris Corp, Earthstar Geographics LLC. 2015. "Flood Insurance Rate Map." October 7.
GP-332	Hepp, Helen	• Earth Economics. No Date. Table 5: County Level Analysis of State Parks Lands IN *Economic Analysis of Outdoor Recreation at Washington's State Parks.*
GP-567	Perrotti, Edward	• Perrotti, E.D. 2009. "A Proposal to the US Energy Department for a New Composite Fabrication Plant to be Located in Grays Harbor County." July 11. • Edward Perrotti, Curriculum Vitae
GP-568	Perrotti, Edward	• Perrotti, E.D. 2009. "A Proposal to the US Energy Department for a New Composite Fabrication Plant to be Located in Grays Harbor County." July 11. • Edward Perrotti, Curriculum Vitae
GP-645	Seiler, Katherine and David	• *The Los Angeles Times*, 2014 Train Derailment. October 8, 2015.
GP-647	Dan Serres	• Washington Energy Facility Site Evaluation Council. 2015. *Tesoro Savage Vancouver Energy Distribution Terminal Facility Draft Environmental Impact Statement.* November. Olympia, WA. Pages from Chapter 1, Chapter 2, & Chapter 4.
GP-648	Dan Serres	• Washington Energy Facility Site Evaluation Council. 2015. Tesoro Savage Vancouver Energy Distribution Terminal Facility Draft Environmental Impact Statement. November. Olympia, WA. Pages from Chapter 5 and Appendix E, Rail Spill Risk Analysis.
GP-649	Dan Serres	• Washington Energy Facility Site Evaluation Council. 2015. Tesoro Savage Vancouver Energy Distribution Terminal Facility Draft Environmental Impact Statement. November. Olympia, WA. Pages from Chapter 3.
GP-667	Simone, Dorthea	• Action Proposal to the American Nurses Association 2012 House of Delegates
GP-706	Steinke, Don	• Resolution from the Columbia River Inter-Tribal Fish Commission

Commenter Code	Commenter	Attachment
GP-707	Steinke, Don	• CRGC Resolution of Columbia River Gorge Commission
GP-750	Sunshine, Susan	• de Place, Eric. 2015. *Grays Harbor oil trains would be severely under-insured.* The Northwest Pipeline on Rails. October 19. • Powell, Tarika and Eric de Place. 2015. Washington is (still) unprepared for a Grays Harbor oil spill and our beaches, birds, and pocketbooks would all pay the price. The Risk of Northwest Oil Spills. October 21.
GP-791	Tuyls, Gar	• Wursig, B., C.R. Greene, Jr., T.A. Jefferson. 2000. *Development of an air bubble curtain to reduce underwater noise of percussive piling*. Marine Environmental Research 49. 79-93.
GP-808	Walker, R.P.	• Spill Event Preparedness Checklist
GP-857	Zeigler. Bob	• U.S. Department of Transportation, Federal Railroad Administration. 2015. Accident Findings Report for Derailment of CSX Transportation, Inc.'s Unit Crude Oil Train K08014 Transporting Crude Oil for Plains All American Mount Carbon, West Virginia. October 9. Washington, DC.
GP-867	Zora, Craig	• Lee, K., M. Boufadel, B. Chen, J. Foght, P. Hodson, S. Swanson, and A. Venosa. 2015. *The Behaviour and Environmental Impacts of Crude Oil Released into Aqueous Environments.* November. Ottawa, ON. Prepared for the Royal Society of Canada.
GP-868	Zora, Craig	• Lee, K., M. Boufadel, B. Chen, J. Foght, P. Hodson, S. Swanson, and A. Venosa. 2015. *The Behaviour and Environmental Impacts of Crude Oil Released into Aqueous Environments.* November. Ottawa, ON. Prepared for the Royal Society of Canada.
GP-869	Zora, Craig	• Science Daily. 2015. Shedding Light on Oil Behaviors Before the Next Spill. Available: <http://www.sciencedaily.com/releases/2015/11/151125233112.htm>. Accessed: December 1, 2015.
GP-870	Anonymous	• Dirty and Dangerous Crude Oil Terminals Proposed in Grays Harbor Factsheet.
GP-871	Anonymous	• Oil terminals, for your consideration. From the Office of Senator Maria Cantwell (09/11/15) to her constituents.
GP-872	Anonymous	• Kilmer, Derek. U.S. Representative. Congress of the United States. Letter to Mr. Davis.
GP-874	Anonymous	• Ecotourism in Ocean Shores, Washington